



**Regional Safety Oversight
Cooperation System**

**Guidance booklet for the safety risk
analysis and management applicable to
the extension of validity of the
ATC rating during COVID-19**

Air traffic controllers

**Approved by the General Coordinator of the
SRVSOP and published under his responsibility**

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1. Purpose

This booklet provides information on safety risk analysis and management applicable to the extension of recent air traffic controller (ATCO) experience requirements during the period of COVID-19 pandemic measures, affecting the validity of ratings.

2. Scope

2.1. This booklet is intended for civil aviation authorities (CAA) who shall issue exemptions to the validity of air traffic controller (ATCOs) rating during the period covered by the COVID-19 contingency, until the date that the CAA may carry out the corresponding inspections according to the requirements established in its regulations.

2.2. In addition, this document provides guidance to States on the postponement of inspections by which the CAA, according with its oversight obligations, would determine the validity of the requirements of the ratings granted.

3. Rules, regulations and related documents

This guidance material is applied to cover the requirements established in:

- a) Annex 1, para. 4.5.3.4 -- Validity of ratings;
- b) LAR 65, Section 65.250 (a) and (b) -- Validity of ratings; and
- c) Doc 10056 - Manual on Air Traffic Controller Competency-based Training and Assessment.

4. Background

4.1. Due to restrictions on physical distancing, workplace closing and other preventive measures imposed by States to prevent or reduce the spread of Coronavirus, the International Civil Aviation Organization (ICAO), with a view to facilitating operations under appropriate safety conditions during the COVID-19 pandemic, encouraged States, through Letter AN 11/55-20/50 of 3 April 2020, to be flexible with their positions, while observing their obligations under the Convention on International Civil Aviation (Doc 7300, Chicago Convention).

4.2. Following ICAO guidelines, States have taken various measures for service providers and aeronautical personnel to keep valid their certificates, licences and other approvals during the COVID-19 pandemic. These measures, that may include temporary extensions to the requirements of national regulations, also known as extensions, waivers or flexibilizations, and which are necessary to maintain aviation operations during the COVID-19 pandemic, constitute temporary exemptions or exceptions and must, therefore, be notified as differences under Article 38 of the Chicago Convention. Refer to ICAO Doc 10050, paragraph 1.2.5, on temporary or short-term differences.

4.3. As part of the risk management process of the State Safety Programme (SSP) and in accordance with Document 9859, Section 8.5.6, *States should evaluate and manage the consequences of changes in their aviation systems*. In this regard, States should proactively identify the safety-related dangers and consequences of any changes necessary to introduce in the aeronautical system resulting from the public health emergency that the world is experiencing, before they are implemented, in order to enable risk management, planning, implementation of actions, and mediate mitigation measures that alleviate the heavy social, political and economic cost that the aviation industry lives due to COVID-19.

4.4. In this sense, the framework of the Safety Management System (SMS), Element 3.2 – Management change of Component 3 – Safety assurance, explains the factors that change the experience of service providers, such as changes to the organization's operational environment, as well as external regulatory changes, economical changes, and emerging risks.

4.5. Changes may affect the effectiveness of existing safety risk controls. In addition, new hazards and associated safety risks can be inadvertently introduced into an operation when changes occur. Hazards should be identified, and associated safety risks assessed and controlled, as defined in the risk identification or safety risk management (SRM) procedures in the organization.

5. Analysis

5.1. ICAO SARPs contained in Annex 1 regarding validity of ratings, provide a minimum overall safety standard that is harmonised by Member States in order to ensure recognition of their certificates.

5.2. Annex 1, para. 4.5.3.4, referring to validity of ratings, establishes that *“A rating shall become invalid when an air traffic controller has ceased to exercise the privileges of the rating for a period determined by the Licensing Authority. That period shall not exceed six months. A rating shall remain invalid until the controller’s ability to exercise the privileges of the rating has been re-established.”*

5.3. Consequently, the regulations developed by the SRVSOP for its member States in LAR 65, Section 65.250, items (a) and (b) establish that:

“(a) the rating loses its validity when the air traffic controller has ceased to exercise the responsibilities conferred on it for a period not exceed by six (6) months, and

(b) the rating remains invalid as long as the aeronautical authority has not proved again the controller’s psychophysical aptitude and practical experience, through the corresponding tests to exercise the powers corresponding to the rating”.

5.4. Taking into account States’ restrictions under COVID 19, which particularly affect aeronautical operations and may impact on the application of existing regulations, where the use of a qualified instructor for on-the-job training (OJT) is not possible, the CAA may adopt flexibilization or exemption measures on the 6-month recent experience requirement, to ensure continuity in the provision of the service when, for example:

- a) as a result of COVID-19-related health issues, some ATCOs may exceed the 6-month recent experience requirement, without having exercised the privileges of a rating or ratings, or
- b) ATCOs return from a leave unrelated to COVID-19; or
- c) the ATS provider may find it necessary to utilize previously rated air traffic controllers to ensure continuity in the provision of the service, due to staff sickness, etc.

5.5. These contingency actions are intended to establish measures for the ATCOs to keep the validity of the ratings granted by the CAA during the COVID-19 pandemic, whose renewal process has been affected by the sanitary restrictions decreed by the governments, that prevent the on-the-job training (OJT) for the renewal of expired ratings in relation to the 6-month recent experience requirement and, thus, be able to comply with oversight obligations.

6. Procedure for the implementation of safety risk management and the granting of exemptions

6.1. The procedure to be applied should enable the identification of hazards and the risk assessment of potential hazard-related consequences, considering the worst foreseeable condition. The results could enable the CAAs to make their requirements more flexible, and grant exemptions regarding validity of ratings for air traffic controllers. The granting of extensions shall be conditional upon compliance with the possible mitigations and to the considerations described for the period of the extension. The following is a simple procedure model that could support in the safety risk and exemption management:

1. Clearly establish the exemption requested with respect to the current requirements that could temporarily extend the period of validity of an ATC rating, allowing the validity extension to continue exercising the prerogatives granted by the corresponding ATC rating;

2. Identify the emerging hazards around the proposed extension;
3. Analyze the possible consequences of an identified hazard;
4. Measure the risk level of the consequences; and
5. Propose strategies for risk mitigation and control.

7. Safety risk management

7.1. The validity of an ATC rating for an ATCO for a certain period of time is based on satisfactory evidence of its performance during the arranged training, which will be in accordance with the regulations established by the CAA that granted the rating.

7.2. Implementing these safety principles in the midst of a pandemic such as COVID-19 is of particular relevance because of the risks involved in adopting flexible measures to facilitate the operation of the aeronautical system in the face of this serious global crisis. It is, therefore, of particular interest to make a thorough analysis of operational risks related to certain SARPs when the application of temporary exemptions is necessary, as well as the need to establish mitigation measures and essential considerations in the decision-making process.

7.3. To facilitate the understanding of the above, it is necessary to analyse different scenarios of flexibility for the expiration term of the rating, the identification of the hazard that may arise, the level of the risk, the risk mitigation actions, as well as three (3) approaches on operational considerations regarding the scenarios that could be presented, in order to serve as a guide for States in decision-making.

7.4. [Appendix A](#) of this document presents the matrix for risk management and extensions of ATC ratings for air traffic controllers, and [Appendix B](#) provides examples of probability and severity tables and risk management matrices that can be used to evaluate the identified risks.

Appendix A

Risk management matrix for the granting and management of the extension of the validity of an ATC rating granted to an ATCO

ICAO: Annex 1, para. 4.5.3.4 - Validity of ratings, and SRVSOP: LAR 65, Section 65.250 (a) and (b) - Validity of ratings

Exemption	Affected population	Hazard identification	Possible consequences	Risk index	Possible mitigations	Operational considerations during the contingency period	Considerations before returning to normal service	Operational considerations during the first few months of return to normal service
Extension of the rating validity period of an ATC with respect to the recent 6-month experience requirement during COVID 19 mitigation period ending no later than 31 March 2021.	Air traffic control units staff that require an ATC rating for the control area, or zone where they carry out their tasks.	Extension of the validity period of the ATC rating due to COVID-19 pandemic.	Decrease in the air traffic controllers staff, causing impact on the operational capacity of the units.	Moderate 3D Remote: 3 Major: C	<ol style="list-style-type: none"> 1. Establish that, at least one of the ATCOs in the executive or peer planning role, meets the requirements of recent experience. 2. Increase performance monitoring or assessment (including if necessary, by remote means). 3. Perform periodic reviews of voice recordings. 4. Conduct oral tests on job knowledge. 5. Perform written tests on job knowledge. 6. Active monitoring of traffic complexity and volume by ATC supervisors to ensure ATCO workload is kept at an appropriate level. 7. Use, whenever possible, of an ATC simulator introducing pre-pandemic recordings with normal traffic situations in order to mitigate the lack of training with adequate amounts of traffic. 	<ol style="list-style-type: none"> 1. Request the presentation of all documentation justifying the extension, within the specifications in para. 5.4, items (a), (b) and (c). 2. Follow-up so that all the sanitary protection measures ordered by the health authority and the CAA are established and complied with by the ATSP. 3. Establish that any deviation not approved by the CAA in reference to the fulfilment of the functions and operational capabilities, will lead to the suspension of the exemption granted. 4. Arrange for the ATSP to report any situation that jeopardizes safety in relation to the exemption granted. 5. Follow-up to ensure that the ATSP schedules work shifts that ensure staff rest and rotation, according to the contingency. 6. Ensure that the procedures for extending the validity of the ATC rating, lifting the extension, and returning to the procedures for granting it according to the normal validity period, are implemented. 7. Implement a mechanism for recording and monitoring reports and trends. 	<ol style="list-style-type: none"> 1. The CAA shall work and coordinate with the ATSP on the recovery plan to return to normal oversight activities in an orderly manner after this crisis. 2. Coordinate with the ATSP a new training schedule for the 6-month recent experience requirement to renew the validity of ratings. 3. Coordinate with the ATSP to carry out the verifications and inspections deemed necessary after the respective training. 4. After the satisfactory completion of the inspections, the CAA may renew the validity of the ATC ratings. 	<ol style="list-style-type: none"> 1. Reactivate the State's safety oversight plan in order to verify application of the requirements to meet the requirement regarding 6-month recent experience for the validity of ATC ratings.

Appendix B

Examples of probability and severity tables and risk assessment matrices

Figure 1: Safety risk probability table

Likelihood	Meaning	Value
Frequent	Likely that the loss of validity of the ATC granting will occur many times	5
Occasional	Likely that the loss of validity of the ATC granting will occur sometimes	4
Remote	Unlikely that to the loss of validity of the ATC granting will occur, but possible	3
Improbable	Very unlikely that the loss of validity of the ATC granting will occur	2
Extremely improbable	Almost inconceivable that the loss of validity of the ATC granting will occur	1

Figure 2: Severity table

Severity	Meaning	Value
Catastrophic	Flexibility in the expiration of the validity of an ATC rating could generate problems or limitations to the operational capacity of the ATC unit under normal and extreme operating conditions. Even incidents.	A
Hazardous	Flexibility in the expiration of the validity of an ATC rating could result in problems or limitations to the operational capacity of the ATC unit under normal and extreme operating conditions.	B
Major	Flexibility in the expiration of the validity of an ATC rating could generate few consequences that do not affect safety.	C
Minor	Flexibility in the expiration of the validity of an ATC rating does not create any type of problems or limitations to the operational capacity in normal and extreme operating conditions.	D
Negligible	Flexibility in the expiration of the validity of an ATC rating does not have the risk of affecting people or causing damage to the equipment to be operated, subject to the extension.	E

Figure 3: Safety risk matrix

Risk probability	Risk severity				
	Catastrophic A	Hazardous B	Major C	Minor D	Negligible E
Frequent 5	5 A	5 B	5 C	5 D	5 E
Occasional 4	4 A	4 B	4 C	4 D	4 E
Remote 3	3 A	3 B	3 C	3 D	3 E
Improbable 2	2 A	2 B	2 C	2 D	2 E
Extremely improbable 1	1 A	1 B	1 C	1 D	1 E

Risk Index Range	Description	Recommended Action
5 A, 5 B, 5 C, 4 A, 4 B, 3 A	High risk	There is no flexibility in the expiration of the validity of the ATC rating in reference to the requirement of recent experience
5 D, 5 E, 4 C, 4 D, 4 E, 3 B, 3 C, 3 D, 2 A, 2 B, 2 C, 1 A	Moderate risk	Provide risk mitigation: restrictions, conditions and recommendations to make the expiration of the validity of the ATC rating more flexible with reference to the requirement of recent experience, permanent oversight and permanent monitoring of the ATSP to report events in a timely manner.
3 E, 2 D, 2 E, 1 B, 1 C, 1 D, 1 E	Low risk	Acceptable as is. No further safety risk mitigation required.
