

# Project Palamon: Progress Update - August 2024

23 August 2024

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***NATS***

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## Context

In response to the CAA's Final Decision on Project Palamon (CAP2100)<sup>1</sup>, and as recommended by the CAA, we committed to provide six-monthly updates on the actions being progressed to address the seven recommendations set out in the Final Decision. This is the sixth update to the CAA.

## Summary of Progress

In its response to the recommendations of the CAA's Palamon investigation (August 2021), NATS (En Route) PLC (NERL) committed to increase staffing resilience of services within the London Terminal Manoeuvring Area (TMA), by increasing both the headcount and number of validations held by controllers and to identify ways to deploy them in a more flexible manner and to train them more efficiently. This update sets out the good progress that has been made in these areas.

Our training programme has delivered an increase in controllers and validations, specifically a 14% increase in validations and 11% increase in controllers since summer 2019. Aligning the training evaluation process has delivered improvements in training efficiencies by allowing students to progress more quickly through the phases of live training. Additionally, standardising procedures for operating the Approach functions has simplified training for controllers extending on to additional sectors.

We have agreed with the CAA additional reporting in the quarterly Condition 11 report as part of the Service Standards Statement Consultation for 2024 onwards. This new delay coding proposal is now part of our regular Service Standard Statement reporting. The details of the new air traffic control delay coding are reported in Section 4 of this document.

<sup>1</sup> CAA (2021), Investigation under s.34 of the Transport Act 2000: Project Palamon – Final Decision, CAP 2100

# Update on the Recommendations

## 1 Staffing Resilience

### Summary

Our training programme continues to deliver both new controllers and additional validations into Terminal Control (TC) Approach. At the end of July 2024, the number of validations supporting the approach control functions of the London airports [compared to summer 2019] were: Heathrow 42 [43], Gatwick 35 [30], Stansted 36 [26], Luton 32 [24] and London City 31 [31]. These validations are held across 126 valid controllers. Together this amounts to a 14% increase in validations and 11% increase in controllers since summer 2019.

These data are based on the month end snapshot before submission of the Palamon progress report and are slightly lower than those reported in the February progress report of +16% validations and +13% controllers compared to summer 2019. The supply trend for 2024 remains positive though, and we are forecasting a net increase in the second half of 2024 in both TC validations and ATCOs.

In addition to increasing headcount and validations, we have continued to enhance resilience by developing initiatives under the themes of training efficiency and flexible deployment of resource.

Please see below further detail on our progress since February 2024.

### Training efficiency

3 Stansted and 2 Luton students are due to commence live training in August 2024. This is in addition to 3 students already working towards initial validations and 3 ATCOs currently extending to gain additional Approach validations. A more efficient evaluation process is being rolled out to reduce extension training durations.

Alongside our training programme, NERL continues to consult with the DfT and CAA on implementing regulation to enable recognition of non-UK based licences as a further route to increase ATCO supply. Work also continues liaising with the CAA and MoD on recognising Military ATCO training for credit towards civil ATCO training. In addition to this NATS is supporting the military as they investigate the potential of developing a civil UK Basic Course as part of their future training.

### Flexible Deployment of Resource: Standardisation of Procedures

Work has continued to standardise and simplify the procedures for operating the Approach functions. These procedures are beneficial for enabling controllers to train for additional sector validations more easily. Our procedures team have continued to engage with the Airport towers to drive the final pieces of alignment work that remained, and we can now confirm that all identified opportunities to align have been completed.

In the 3 months to May the last of the instructions for the updates to the MATS Part 2 Approach sections were issued, including Heathrow and London City alignments, as well as the permanent introduction of the VFR crossing procedures for Stansted which became effective on 10 April 2024. There have been several other minor alignment updates made to the Stansted Approach section with those instructions issued in April.

An assessment was made with the support of TC Approach subject matter experts (SMEs) of a proposal to move the common parts of the approach function from each Approach section to a separate, generic Approach section in the MATS Part 2. The feedback was consistent from the SMEs that there would be no benefit in doing so for learning first validations, nor would having it separate impact cross-training and learning subsequent sectors. As such this proposal will not be progressed.

#### Flexible Deployment of Resource: Operational staff deployment

We noted in our February 2024 update that we had reached agreement with the Prospect trade union around the provision of additional attendances and flexibility from the current ATCO workforce. This will apply for the summer periods throughout the rest of the NR23 period and began in May 2024. As a result, at the end of July, there were approximately 400 additional attendances confirmed in the May to August 2024 ATCO rosters across NERL than had been achieved for the same months in 2023. NATS and Prospect will review the effectiveness of the agreement for additional attendances and flexibility at the conclusion of each summer season, in order that refinements be made where required.

Improvements continues to be prioritised across the business to provide further mitigation for both supply and demand risk in the coming years across NERL operations. We continue to explore:

- > changing the way we deploy operational staff both into the operation and to service non-operational activities, to make our supply more agile to meet fluctuations in both sources of demand
- > further transformation of the ATCO training process designed to deliver new ATCOs into the operation with improved success rates.

Several of these mitigations will require detailed engagement with the Prospect trade union and this is underway. Benefits realised for staffing resilience will be shared via these updates.

## 2. **Airspace Change**

Closed in Update 3 – February 2023.

## 3. **Engagement with Stakeholders**

Closed in Update 3 – February 2023.

## 4. **Coding of Air Traffic Control Delay**

NERL has continued to engage with Eurocontrol Network Manager and industry stakeholders regarding the proposed delay codes.

Following the NM NETOPS rejection of the "K" code and proposed clearer definition required to the "J" code, the Network Manager set up a working group to discuss possible alternatives. A meeting was held on 12 June 2024 with participants from several European ANSPs, the Eurocontrol Performance Review Commission and IATA. A summary of the main discussion points is below:

- > ATFCM delay codes proposal: The group discussed the PRC proposal to introduce two new codes (J and K) to improve transparency and granularity of delay reasons related to staffing and weather. The group noted the NETOPS decision that rejected the use of the K code and for the Operational Development Sub-Group (ODSG) to clarify the definition of the J code.

- > The group discussed and agreed that the root causes in most cases related to staffing and particularly long term or structural staffing. Furthermore, the group raised different perspectives on how to record staffing issues based on planned or actual sector configurations.
- > Staffing delay guidelines: The group agreed that the current guideline for ATC staffing delay is too restrictive and does not reflect the structural or long-term staffing issues that some ANSPs face. The group suggested to either redefine or split the staffing code into two categories, one for short-term or unplanned staffing issues and one for structural or planned staffing issues. The group also discussed the possible reference points for defining staffing issues, such as the NOP, the D-1 Network Plan, or the relevance to define staffing issues in tactical phase.

The follow up tasks from the meeting on this topic are summarised below:

- > Draft a proposal for redefining or splitting the staffing code and share it with the group for feedback (Eurocontrol).
- > Review the current guidelines and definitions for weather and staffing codes and identify any gaps or inconsistencies (All participants)
- > Schedule a follow up meeting in early September (Eurocontrol).

Further to the tasks above, a draft proposal has been produced for discussion at the next meeting on 11 September.

#### Post-operational delay reporting

In the NR23 Provisional Decision, the CAA recommended the use of delay codes proposed by the Eurocontrol Performance Review Commission (PRC), however, these codes have not yet been adopted by the Network Manager and are not available for selection on application of regulations.

To accommodate the CAA's request and provide further transparency on the capacity delay (CE) and weather delay (WE), we have included modifications in the Condition 11 Statement.

#### **5. Sector information to Eurocontrol**

NERL continues to meet the objective of this recommendation. NERL provides the information required by Eurocontrol Network Manager (NM) in the format it requests, and on a timely basis, to support NM activities.

We have established a high-level Business to Business (B2B) connection with Eurocontrol to receive data from the Network Manager. This is the first step towards being able to exchange data with NM and provide dynamic sector opening information in line with the iNM digital transformation programme over the coming years.

No further progress on this recommendation since the previous update.

#### **6. Performance Data**

Closed in Update 2 – August 2022.

## 7. Reporting on Resilience Planning

This sixth issue of our six-monthly reports meets part of the CAA's recommendation 7, to report on progress in maintaining a resilient service through adequate supply of operational staff across our network, as well as on steps to enhance airspace capacity and to engage more effectively with airline customers and airports on operational performance. We meet other parts of the recommendation in the updated staffing resilience plan, updated annually, with next issue aligned with the February 2025 submission of this report. In addition to this reporting, we engaged closely with airline customers and airports during 2021 in developing and consulting on our business plan for the NR23 regulatory period 2023-27, and subsequently on our evolving investment portfolio via the six-monthly Service and Investment Plan (SIP) consultation, with progress reports in the intervening quarters. This includes presenting evidence on the projected range of demand for en route service, versus the projected range of supply, as well as implications of traffic levels and the scale and pace of capital investment for service outcomes (in terms of delay and flight path efficiency).

The list below shows, in chronological order, where we have shared and discussed our staffing plans with customers since the issue of the Palamon Decision in February 2021:

- i. Palamon Decision Response (August 2021)
- ii. NR23 business plan prospectus and consultation (Autumn 2021)
- iii. Staff Resilience Plan Issue 1 (January 2022)
- iv. Palamon Update #1 (February 2022)
- v. NR23 Business plan submission (February 2022)
- vi. Palamon Update #2 (August 2022)
- vii. NERL response to CAA's Initial Proposals for NR23 (December 2022)
- viii. Staff Resilience Plan Issue 2 (end January 2023)
- ix. Palamon update #3 (February 2023)
- x. NERL Condition 5 Certificate 2R 2023 (June 2023).
- xi. Palamon update #4 (August 2023)
- xii. Staff Resilience Plan Issue 3 (end January 2024)
- xiii. Service and Investment Plan (SIP) consultation (January 2024)
- xiv. Palamon update #5 (February 2024)
- xv. Service and Investment Plan (SIP) consultation (June 2024)

Over the last two years, much of the consultation on staffing has been through the NR23 review process, and as that process concluded in November 2023, we envisage that for the remainder of this project most of our customer engagements on this topic will be via our regular SIP consultation and these Palamon updates.