

COVID 19 — Effects on Aviation Safety?

Issue No: 02/20

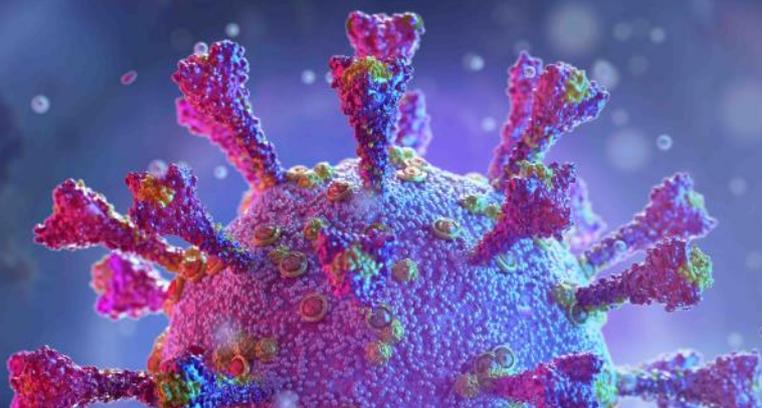
COVID-19 and the associated public health restrictions have generated significant impact on the global aviation community and created substantial operational disruptions and additional pressures.

In such challenging times it is essential that the business and corporate aviation community continue to pay particular attention to and manage these consequential aviation safety risks.

The aim of this Safety Matters is to provide guidance to all persons involved in the operation of aircraft registered in the Isle of Man on the potential aviation safety risks resulting from COVID-19 and possible strategies for their mitigation. The content has taken account of and summarises selected advice issued by other aviation safety and regulatory organisations and these are credited and listed for direct reference at the end of the document.

We recognise that it is not possible for us to tailor this Safety Matters to the unique circumstances of your own operation. There is significant diversity in the size, scale, complexity and geographical operation of operators of Isle of Man registered aircraft; therefore, this guidance instead attempts to highlight salient safety points so that you can consider "what does this mean for me and my operation?"

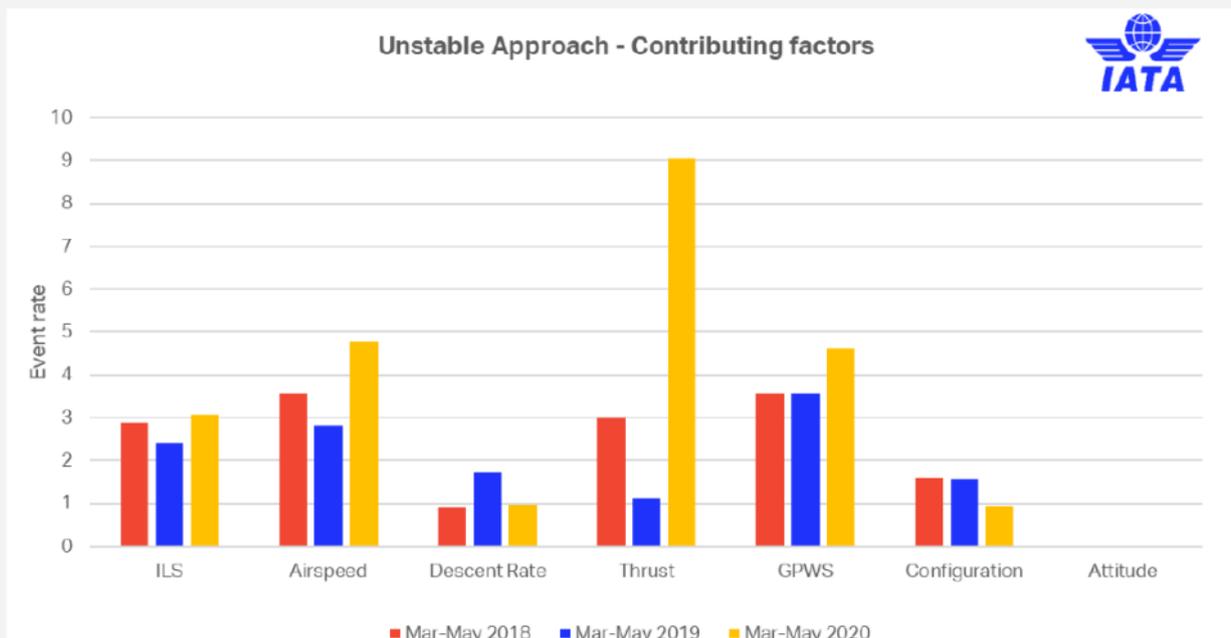
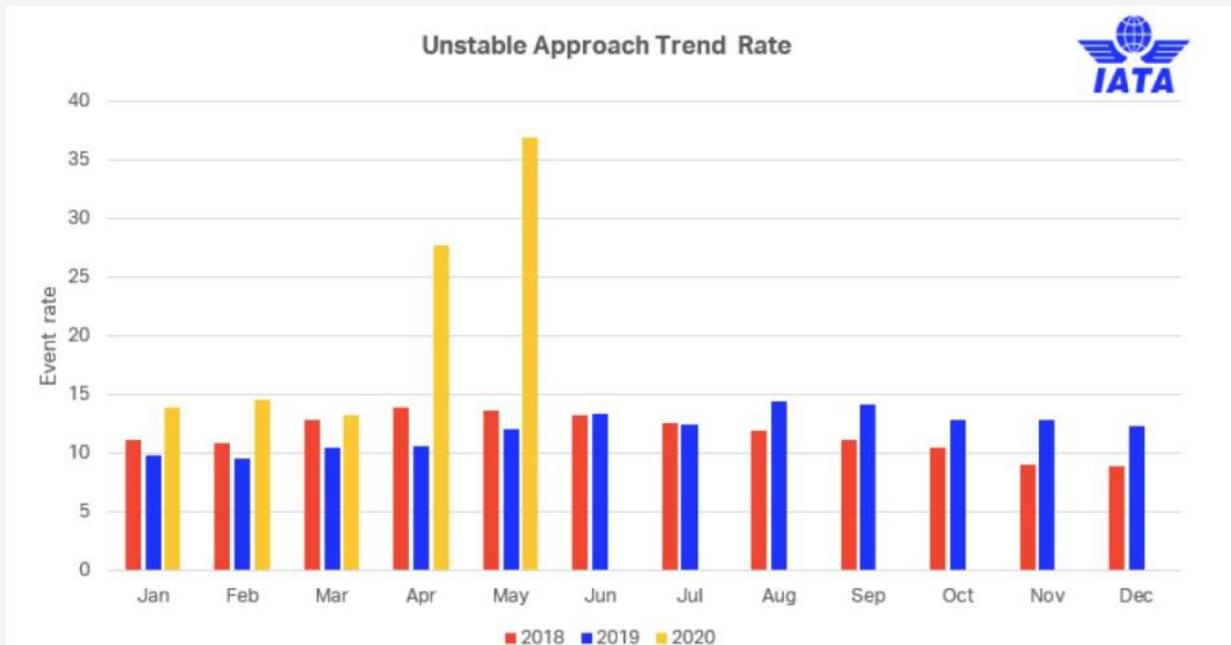
Some operators may establish that there has been limited immediate effect on the activities that they directly control and manage. For other operators the effects could be significant due to their operational and local circumstances. However, in all cases we recommend considering the potential for adverse effects in the aviation sectors outside your direct control on which you rely or whose activities could impact on your own safety performance. For example: ground handling; aerodrome operation; ATC; etc.



EMERGING GLOBAL AVIATION SAFETY EVENTS

It is not possible to correlate with any certainty that there have been global aviation safety events as a direct result of the COVID-19 situation. However, in recent months it is evident from aviation media that there have been a number of ground collisions between commercial aircraft on aprons/taxiways. Additionally, and of particular concern, is recent data issued in an [IATA Operations Notice](#) regarding unstable approaches. The IATA database has shown a significant increase in unstable approaches per 1000 operations over the first half of 2020 when compared to the previous two years.

According to [IBAC's 2013 Business Aviation Safety Brief](#) most business aviation accidents occur in the landing phase. Therefore, whilst the recent IATA data is sourced from commercial air transport operations, we feel that it should also be highlighted to all corporate/business aviation operators for their immediate further consideration.



If you have set a stable approach criteria, is it appropriate and is it being complied with?

If you have not set a stable approach criteria then we recommend that you consider the potential to adopt such best practices from commercial air transport.

Further guidance is available from: [Skybrary – Stabilised Approach](#)

HUMAN FACTORS

The effects of public health restrictions and the high number of social changes that have been imposed by these measures generates a number of aviation safety human factors related effects including: uncertainty, distraction, stress and fatigue.

Many staff will return to duty with a certain level of psychological stress, and operators should evaluate the need to provide targeted support in specific cases. Front-line staff may not feel “fit” for the duties but be willing to “go the extra mile” in order to support their organisation.



Aircraft operators should openly and actively acknowledge these social effects and take steps to mitigate the consequential aviation safety risks.

Fundamentally, it is important for managers to support their personnel and empower people to slow down or stop the operation if needed.

The Flight Safety Foundation have published [An Aviation Professional's Guide to Wellbeing](#) to help staff members or any other person to improve / maintain their wellbeing. It describes the idea of wellbeing and offers simple tools which are easy to use.

The Human Factors Considerations During Covid-19 Restart Activities [published by the UK CAA](#) are highly recommended for your consideration. The UK CAA's infographic from this guidance is reproduced overleaf.

Ask the people who do the work

If processes, tasks and environments need to change as a result of new COVID

requirements, consult with the people who usually do these things to help you find the best way to change them. Use a people-centred design approach.



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Be Transparent



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People dislike uncertainty, make sure any changes are communicated clearly and quickly, and change-management resources put in place to help people adjust.

Help with memory

There will be new things that we need to remember to do post-COVID. We should expect memory for new items to need support because we are busy. Help can be provided with lists, aide-memoires, training and more time.



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Beware Skill-Fade

It may be some time since people have completed their working roles, they might need some time, a refresher, or extra memory aides to help get back into usual work. For some complex roles we will have to work back towards the new normal using a range of tools.



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Allow people to say 'STOP'

With all the changes there may be new or revised processes that do not work quite the way we expect. Ensure there is a way for people to raise and record any new safety concerns, and to 'call stop' if they are concerned.



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Be Considerate

We have all experienced different pressures and stressors during this time. Avoid assuming that you know what someone needs; ask them instead. Make sure wellbeing resources available to your people are easy to access.



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Manage Fatigue

Fatigue issues may be more likely or more severe and need to be actively managed. New and potentially distracting factors may increase workload, exacerbating fatigue levels.



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Take extra time

This is true for tasks or processes that you have not done in a while, and new processes that have been put in place post-COVID. Mistakes can happen when we are feeling pressured and rushing, so take extra time, and longer than you think you need.



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SAFETY MANAGEMENT SYSTEM

The proactive use of safety management principles to identify and mitigate aviation safety hazards stemming from COVID-19 is particularly important in such challenging times.

The 'recovery' or 'return to normal' phase may require changes to pre COVID-19 norms. Therefore, operators need to be aware of the potential for new risks, and to put in place effective mitigation measures. This does not necessarily require complex risk assessment methodologies, but primarily requires a "safety management mind-set".

Flight crew and front-line personnel may have to implement new or modified procedures under significant pressure, therefore potentially working out of their comfort zone. Aircraft operators should therefore take time to consider the risks associated with operating in such a new and uncertain environment.



However, this is complicated as operators have never faced such extensive disruption to their aviation activities and therefore cannot entirely rely on previous experiences when analysing the possible scenarios and solutions. Furthermore, they may be subjected to emerging hazards outside their direct control. Proactive measures to identify hazards may therefore be needed in rapidly changing operating circumstances, since occurrence data will take time to build up.

Aircraft operators may benefit from considering the contents of the following documents:

[Review of Aviation Safety Issues Arising from the COVID-19 Pandemic - EASA](#)

[Pandemic Non-Medical Operational Safety Aspects Supplemental Materials](#) – Flight Safety Foundation

The operator's senior management should communicate to all staff the importance of safety in the context of recovery, in order to minimise the likelihood that front-line personnel may feel entitled, or even obliged, to "cut corners" or deviate from the approved SOPs in order to cope with the situation.

Aircraft operators should pay attention to any signal hinting to a reduction in the safety margins. Effective decision-making relies upon the collection of safety data and information that indicates whether operations are being conducted an acceptable level of safety. Therefore, appropriate feedback needs to reach the operator's senior management. Key to achieving this aim is **open and proactive safety communication across all elements of the organisation.**

LICENCES, MEDICALS AND CURRENCY

States have published various exemptions and allowances from the normal regulations on personal licences, medical certificates and currency.

Some of these are complex and have varying conditions and/or constraints. Whilst it is the responsibility of the licence holder to exercise their licence privileges in accordance with the requirements and conditions imposed by their State of Licence Issuance (the "Licensing Authority"), it is also important for the aircraft operator to also be assured that their licence holders are not just legal but also safe to operate.

For holders of flight crew or aircraft maintenance engineer licences that have been validated by the Isle of Man Aircraft Registry (IOMAR), our policy is as follows:

- Unless notified otherwise, the IOMAR accepts the licensing/medical certificate variations/exemptions issued by the Licensing Authority. However, the Isle of Man Certificate of Validation is conditional on the licence holder complying with the requirements of their Licensing Authority.
- Any restrictions or conditions imposed by the Licensing Authority as part of their variation/exemption must also be complied with by the licence holder when operating an aircraft registered in the Isle of Man.



Please note the text on our certificate of validation which states: "This validation and all attached privileges is contingent upon the continued validity of the said licence of the issuing State".

Any noncompliance by the licence holder with the Licensing Authority variations/exemptions whilst operating an aircraft registered in the Isle of Man would in our view invalidate the licence and therefore invalidate the Isle of Man Certificate of Validation.

ADDITIONAL FLIGHT PREPARATION CONSIDERATIONS

The additional activities needed to plan flights around differing public health restrictions in individual States is a significant and time consuming task which places additional pressure and potential for distraction on flight crew.

It is essential that appropriate time and support is provided to ensure this can be completed and to minimise the fatigue effects and additional stress from such activities. It is imperative to ensure that the crew are not distracted during the flight by considerations about public health restrictions on arrival.



ISLE OF MAN AIRCRAFT REGISTRY ARRANGEMENTS

We would like to thank our customers for your understanding and patience whilst the team worked remotely in response to the COVID-19 situation. Our staff continue to work tirelessly in support of you in a bid to minimise any interruption to service during this unprecedented time.

The current situation on the Isle of Man has improved to the extent that staff have been able to return to the main office, although the circumstances may change thus forcing a return to remote working.

However, whilst the team are able to be in the office, we are pleased to advise clients of the reinstatement of our telephone line +44(0)1624 682 358 should you need to speak to us. You can of course continue to contact us via our email aircraft@gov.im if you prefer. Either way, you can be assured of our best efforts in support of your needs.

We acknowledge and empathise with the ongoing challenges presented by COVID-19 to industry and will continue to closely monitor international developments, whilst adapting appropriately to maintain the highest levels of Safety with Service.

Kind regards

All of the team at the Isle of Man Aircraft Registry

REFERENCE MATERIAL:

[An Aviation Professional's Guide to Wellbeing](#) - Flight Safety Foundation

[Operations Notice Number: 002/2020 - Unstable Approaches during Reduced Operations](#) - IATA

[Pandemic Non-Medical Operational Safety Aspects Supplemental Materials](#) – Flight Safety Foundation

[Review of Aviation Safety Issues Arising from the COVID-19 Pandemic](#) – EASA

[Safety Notice 2020/0011](#) - UK Civil Aviation Authority