

# Air ambulance speech

**Given by Richard Stephenson, Director of Communications at the CAA**

## **Introduction**

Thank you for the opportunity to be here today – you offer a unique and very important service to the UK and it's a privilege to be able to pay tribute to that.

You will have realised that I am not Andrew Haines but will have also have noticed that our own resilience plans at the CAA mean that I can be here in his place.

Andrew is very sorry not to be here and has asked me to extend his apologies to you all.

For us resilience means many things and I'll cover off a handful today.

I'll offer a brief introduction around what the CAA is and does and some of the range of issues we cover that have a resilience element – for example when we speak about resilience in the CAA one of the first things we think about, which is topical at the moment, is the resilience of London's airports and the demand for extra capacity.

I'll then talk about Europe and our relationship with the European regulator EASA and then some issues that affect the Helicopter Emergency Medical Services Sector.

## **The CAA**

Some of you may not be familiar with the UK CAA and how it works. So it is probably worth me giving you a little back story.

We have been around since 1972, we are an independent aviation regulator, over time our roles and duties have changed both as the European aviation landscape has changed, for instance with the introduction of EASA, and as we have gained new roles and responsibilities. Today we exist to ensure that:

- The aviation industry meets the highest safety standards
- Consumers have choice, value for money and are protected and treated fairly when they fly
- Security risks are managed effectively
- And we play a key role in the modernisation of a critical piece of national infrastructure - Airspace

Some other examples of what we do include:

- our own rescue service – the ATOL holiday protection scheme that repatriates and refunds people if their holiday tour operator fails
- Work to financially regulate any new runway capacity in the south east

Over the past few years we have been leading a programme of change at the CAA which has been seeking to make us more risk focused, more financially self-sufficient and more responsive to the needs of those we regulate. It remains a work in progress.

Our costs are met entirely by those we regulate and to those we provide a service; we are not publicly funded. The CAA has this in common with many of your organisations.

Most of our involvement with air ambulances comes via operational permissions or pilot regulation.

We like to take an inclusive and constructive approach to our work, through a robust but user-friendly regulatory framework that keeps safety as our collective priority.

We do not always get it right but we are ready to work with all of our stakeholders to continue that journey of improvement, and that is why we were delighted to take this opportunity to meet and speak to you.

## Europe

The resilience of our aviation safety system relies heavily on international and European arrangements.

Key to this within Europe is EASA – the European Aviation Safety Agency.

Depending on the outcome of the negotiations between the UK Government and the EU Commission and Member States, Brexit may have a wide range of implications for aviation and for how we all work.

The CAA has a role in providing analysis and insight to Government, as it considers its way forward. The eventual outcome is, of course, a matter for Government and they have been clear that they will not be providing a running commentary.

The Government is certainly conscious that Aviation is a critical sector and it is listening. Only this morning, Andrew Haines, attended a workshop with David Davis, Cabinet Secretary responsible for Brexit, with leading aviation players.

We believe 4 principles should guide the aviation agenda as part of the Brexit negotiations:

- 1) That UK aviation should continue to punch its weight – London is the single biggest destination for aviation consumers and the combined civil and military aerospace sector is second only to the US in terms of scale.
- 2) We must remain influential internationally if we are to preserve UK citizen safety and security as a huge proportion of UK citizens will involve international destinations and/or non UK airlines.
- 3) That consumers should benefit from greater competition.
- 4) The rights afforded to consumers in terms of environmental and consumer protection should be preserved.

## **Sector issues**

So, what does this all mean specifically for the air ambulance sector?

Sticking with the European theme – planned changes to European rules could affect the availability of helicopter crews – which is an obvious resilience issue.

EASA's rules which govern the maximum working time for pilots and other crew members are set to be amended in 2017 / 18 and will extend to technical crew. This comes into effect when a one pilot operation has the support of a doctor or medic acting as an assistant to the pilot.

They then come under the flight time regulations, which place strict limits on things like hours and minimum rest periods.

What makes this particularly complicated is that some of these “pilot assistants” - for example paramedics - may not be exclusively employed on the helicopter. They could be on ambulance duty on other days and find it very hard to fit Flight Time Limitations requirements.

We think that 50 to 70 per cent of technical crews on air ambulances will be affected.

As with most things in life – one size doesn’t fit all.

There will be some paramedics acting as technical assistants undertaking tasks like using night vision goggles, or operating winches. So potentially tiring work that should be covered by FTL requirements - but others who are not undertaking these tasks will be less fatigued and therefore there is less of an argument that they should be covered by FTL.

Along with other nations and representative organisations we are actively engaging with EASA.

As well as current crew there is a resilience factor in ensuring new pilots come into the sector.

With North Sea operations in decline, we are seeing pilots moving to police / HEMS.

But, even with that move, growth in the sector and a large number of pilots approaching 60 could mean a pilot shortage.

There is the possibility that EASA could extend single pilot operations to 65 years of age – and we are investigating what options we have nationally, here in the UK to do that.

The issue is one of medical fitness so there is a view that increased monitoring of individuals could result in an extension – as an equivalent level of safety could be reached.

European organisations will meet with EASA in late November to discuss this, but, for now, we maintain the rule requiring commercial pilots to retire at 60.

Other reasons for a shortage of pilots include the introduction of bigger aircraft, for example the EC145, that require two crew. An option here to alleviate the issue safely might possibly be lower requirements for commanders of multi pilot operations.

For example, a possible relaxation for onshore commercial operations for two Commercial Pilot License holders flying together but the captain not meeting the requirement of 1,000 hrs for an Airline Transport Pilots License.

If we don't address these issues sensibly we lose the safety gain of having two pilots.

You don't need me to tell you that the air ambulance sector is in a unique situation compared to other areas of aviation.

This presents some interesting questions and challenges for us (CAA).

Not least of these is the request regularly to carry TV cameramen – not something we normally get from other areas of aviation!

Our safety team has circled around on this issue a number of times.

Yorkshire air ambulance has been allowed to carry cameramen for the past 6 years. Now others are asking. We are currently investigating how this could happen.

There is a meeting planned at Gatwick Airport on 12 December for all HEMS operators. The aim is to listen to your concerns about the use of cameramen and facilitate an agreed standard of training to bring future camera operators up to a HEMS crew status.

We are entering an era where new helicopter designs are coming into service and operators are thinking about updating their fleets.

With new aircraft come new challenges, including more night flying and winch operations.

As this happens – some notes of caution:

**Firstly**, regulations currently state that a helicopter can land in sites more than twice the size of the radius of the helicopter blades but our experience is this space seems to be getting smaller and smaller!

We understand the desire is to help victims and get the job done – but pilots can't and shouldn't operate below minimum regulations to save one life as by doing so they may well be endangering many more on the ground.

While cautioning on this we also acknowledge HEMS expertise in the area over other helicopter operators.

This December we're hosting a CAA safety culture seminar on the back of the Vauxhall helicopter accident.

Landing site selection is one subject to be discussed. HEMS operators will be delivering presentations on this, amongst other issues. You are rightly seen as leaders and experts in this area as you have to do it all the time, especially at night, so we are looking at you to pass this expertise on to other commercial operators.

**Secondly**, fewer than 35% of operators are currently undertaking HEMS flights at night. With new aircraft and better cockpit instrumentation, this might increase. It is of course a very different, more demanding environment and so we would prefer to see two pilots in the cockpit if this is to happen.

The UK currently treats night operations differently from EASA, in that we require Night Vision Goggles (NVG) to be used, not just the helicopter's external light. Many other countries agree. But a significant number of pilots recruited from the military to enter HEMS may have never used NVG. So this is one to watch if you are thinking of moving into that area.

New helicopters have more complex autopilots - so we need to make sure that pilot training programmes keep pace with this rapid rate of change

We're actively encouraging operators to use simulators to help with that – and more advanced simulators are becoming available all the time.

While we're talking about pilots, I must mention the CAA's Shared Service Centre. This is our customer-focused 'one stop shop', providing a single point of contact for customers – pilots - requiring multiple services from us.

It's still a work-in-progress but I know that the newly formed management team at our Shared Service Centre has the momentum and desire to deliver.

What hasn't gone so well? Processes and controls are immature, embedding the right measures and behaviours takes time, so of course this can lead to some frustration for both office and field teams and have a negative impact on the levels of service we're delivering

Bear with us. The plan is that this Shared Service Centre will make things easier, faster and more efficient.

And it's the savings generated by the Shared Service Centre that has enabled us to invest in new technology to help deliver a better all round service.

## **Drones**

Before I conclude, it would be remiss of me not to mention drones.

Your safety can also be affected by elements beyond your control.

A recent episode of BBC's casualty, where a drone hit the tail rotor of a HEMS aircraft, vividly illustrated the potential risk that drones pose if flown unsafely.

It is important to recognise that drones are not automatically bad. Given the rate of innovation in recent years, it is not a huge stretch of the imagination to envisage a drone transferring a human transplant organ from hospital to hospital to save a patient that had been recovered by a HEMS operation.

If Amazon believes it can deliver your groceries this way, why not also explore opportunities to use this technology to support the emergency care of critically ill patients?

So we absolutely need to make sure all drones are flown safely now so as to not stifle any really good opportunities for the future.

We think this can happen via three strands of work:

- 1) Technology in drones such as geo-fencing that automatically stops drones entering certain areas of airspace
- 2) Key locations fitting ground based blocking systems – preventing drones from entering their area
- 3) Education of consumer drone users

We have input into all of these areas.

Education is something we've been particularly involved in recently as if we can get drone users to understand the risks and rules then we can prevent incidents in the first place.

Last year we launched the CAA's drone code which outlines how to operate a drone safely and responsibly.

As well as reaching those using drones, we're also involved in research projects to assess and quantify the real risks – particularly around collisions with aircraft – working closely with Government and others to influence future drone strategy for the UK.

Something we will continue to put significant resource into for the foreseeable future.

## **Conclusion**

So, in conclusion, I want to once again pay tribute, on behalf of everyone at the CAA, to the work that HEMS crews do every day across the UK. It is amazing that so much of this work is funded by charitable donations, and as a charity fundraiser myself, I know only too well the challenges of raising significant amounts of money. The nature of the work HEMS does means that risk is never far away and this makes safety rules and training even more important. We have much in the pipeline that means we will have continued contact in the weeks, months and years ahead and we look forward to working with you as these things progress.

Thank you.