Future Safety

Review of CAA policy on the training, qualification and licensing of Flight Information Service Officers

CAP 1669

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Published by the Civil Aviation Authority, 2018

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First published 2018

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Abbreviations

A

ABES	Abnormal and emergency situations
ACC	Area control centre
AFI	Aerodrome flight information – Instrument rating
AFISO	Aerodrome flight information service officer
AFIS	Aerodrome flight information service
AFV	Aerodrome flight information – Visual rating
AGCS	Air ground communication service
ALARP	As low as reasonably practicable
AMS	Apron management service
ANS	Air navigation service
ANSP	Air navigation service provider
APC	Assessment of previous competence
ATC	Air traffic control
ATCO	Air traffic controller
ATM	Air traffic management
ATS	Air traffic services

C

CAA	Civil Aviation Authority
CAP	Civil aviation publication
CFIT	Controlled flight into terrain

D

DfT	Department for Transport

E

EASA	European Aviation Safety Agency

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EU	European Union

F

FAS	Future Airspace Strategy
FIS	Flight information service
FIS	FIR Flight Information Service rating
FISO	Flight information service officer

G

GA	General aviation

H

HF	Human factors

I

IAP	Instrument approach procedure
ICAO	International Civil Aviation Organisation
IFISA	International Flight Information Service Association
IFR	Instrument flight rules

N

NPA	Notice of proposed amendment

O

OJT	On the job training
OJTI	On the job training instructor

P

PANS-ATM	Procedures for air navigation services – air traffic management (ICAO Doc 4444)
PBR	Performance based regulation
PPR	Prior permission required

R

RAF	Royal Air Force

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RMT	Rulemaking task
RMZ	Radio mandatory zone
RN	Royal Navy
ROCC	Radio operator's certificate of competence

S

SARG	Safety and Airspace Regulation Group (of the CAA)
SARPS	Standards and recommended practices
SERA	Standardised European Rules of the Air
SSC	Shared Services Centre
STDI	Synthetic training device instructor
SUR	Surveillance rating endorsement

T

TMZ	Transponder mandatory zone

U

UCS	Unit competence scheme
UTP	Unit training plan

V

VFR	Visual flight rules

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Executive Summary

Fundamentally, CAA policy on the training, qualification and licensing of flight information service officers (FISOs) has changed little since around 1979. Yet, by contrast, the arrangements for air traffic controllers (ATCOs) have been subject to continued evolution; seeing them adopt new technologies and ways of working in parallel with advances in the wider aviation industry they serve. This evolution in aviation is particularly evident in General Aviation (GA) – the primary user of air traffic services provided by FISOs – where major advances have been made in aircraft design, systems and products for the use of GA pilots.

Driven by a number of factors, not least requests from industry for change and the growing demand for widespread airspace modernisation, the CAA has undertaken a review of its FISO licensing arrangements. The primary objective of this 'FISO Review' has been to scrutinise CAA policy and, if necessary, to develop concepts for the future which we could consult upon with industry. The purpose of any future change would be to ensure that FISO licensing arrangements can adapt to the future needs of the UK's ATM system and facilitate UK airspace modernisation.

In this document, we make the argument for change and propose concepts that we believe could form the basis of future CAA policy. We believe that the potential benefits which would be afforded by adopting the concepts proposed herein reach far beyond the nature of the operational and administrative changes themselves. These concepts also need to be seen in the wider context of the opportunities and overall system benefits posed by airspace modernisation activity in the UK.

It is important to stress that, through this consultation, we are gathering information and opinions from our stakeholders that we will use in the next stage of policy development. These are not yet firm policy proposals and we are not yet committed to the kind of wholesale change that adoption of all the concepts described herein would represent.

Nor are these proposals about 'forcing' a wholesale change of processes and procedures on industry. The concepts that we propose in this document are there because we believe that they're appropriate, pragmatic and the right thing to do to achieve our objectives. The most important of these being to ensure that FISO licensing arrangements can adapt to the future needs of the UK's ATM system and facilitate UK airspace modernisation.

As such, we seek the views of our stakeholders in order to shape the future of FISO licensing policy in the UK and to determine our next steps in the development of that policy.

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Chapter 1 - Introduction

Background

1. The CAA first issued policy on the licensing of flight information service officers (FISOs) in 1979 through CAP 427. Whilst CAA policy has been amended since 1979 – seeing CAP 427 replaced in May 2013 by CAP 1032 – the fundamental training, qualification and licensing criteria, systems, processes and procedures appear to have changed little over this time.

2. By contrast, the arrangements for air traffic controllers (ATCOs) have been subject to continued evolution; seeing them adopt new technologies and ways of working in parallel with advances in the wider aviation industry they serve. Adoption of new technology is equally evident in General Aviation (GA) – the primary user of air traffic services (ATS) provided by FISOs – where major advances have been made in aircraft design, systems and products for the use of GA pilots[1]. In a move reflected internationally, we have also seen a growth in ATS provision by FISOs in the UK, particularly at aerodromes. However, as stated, the training, qualification and licensing criteria, systems, processes and procedures which underpin this ATS provision have changed little since 1979.

3. The Government is clear about the importance of ensuring a long-term strategic vision for the GA sector that helps it to realise its full economic potential[2] and published its strategic rationale for the UK's plan to modernise its airspace[3]. In support of these, we need to ensure that those who provide ATS, particularly to the GA sector, need to have the right knowledge, skills and supporting processes and procedures to back this vision.

4. In early 2016, the Association of UK FISOs submitted their analysis[4] of CAA FISO licensing policy to the CAA. This provided the initial impetus for the CAA to undertake a more formal review of its policy relating to the training, qualification

[1] *UK GA Sector in crisis*, L Price FRAes, Royal Aeronautical Society, September 2017.

[2] *Beyond the horizon, the future of UK aviation, next steps towards an Aviation Strategy*, HMG, April 2018.

[3] *Upgrading UK airspace, strategic rationale, moving Britain ahead,* HMG, February 2017.

[4] The Association of UK FISOs conducted an in-depth review of CAP 1032 Aerodrome FISO Licensing in summer 2015, making a series of requests for change to the CAA including the standardisation, where practicable, of ATS licensing arrangements; the introduction of licence endorsements for language proficiency, assessors and on-the-job training instructors; the introduction of a requirement for a unit training plan and unit competence scheme; the provision of training and guidance material for instructors and assessors; the development of fatigue risk management policy applicable to FISOs; and, the introduction of training in human factors and abnormal and emergency situations.

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and licensing of FISOs; with a number of other 'drivers for change' becoming evident.

Drivers for change

5. Demand for air travel has grown strongly in recent decades, and the Government expects that demand will continue to rise significantly between now and 2050[5]. Growth in demand for air travel means increasing pressure on our airspace which, in turn, is driving a need to undertake wide-ranging modernisation activity. We need to ensure that FISOs, air navigation service providers (ANSPs) and users of these services can operate within a modern air traffic management (ATM) system and exploit the opportunities posed by modernisation.

6. As the availability of new technology has improved and the associated costs reduced, demand for instrument approach procedures (IAPs) at aerodromes with non-instrument runways has increased. We need to ensure that FISOs are equipped with the knowledge and skills required to facilitate the conduct of such approach procedures.

7. European rulemaking activity on Implementing Regulation (EU) No 2017/373 (ATM/ANS Common Requirements Regulation) Annex IV 'Part-ATS' includes organisational and technical requirements on aerodrome FIS (AFIS) and has highlighted areas where UK airspace and ATS provision in Class G airspace has developed in a bespoke manner that differs from many parts of the world, including the rest of Europe. As such, implementation of 'Part-ATS', and the ICAO Standards and Recommended Practices on which it is based, presents significant implications for ATS provision and the application of the airspace classification system within the UK.

8. There is an international shortage of ATCOs and an emerging risk of a shortage of FISOs in the UK. As a career choice, ATC has limited visibility within the employment market[6] and, in the UK, a FISO much less so; NATS have identified that 85% of 16 to 25 year olds have never considered a career in aviation[7]. There is limited career progression available for FISOs due to the nature of the licensing structure and there being no recognition of their training and experience in the attainment of an ATCO's licence. FISOs will continue to play important roles in the future of the UK's ATM system and thus it is critical that ANSPs can attract and retain the right people with the right skills.

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[5] *Beyond the horizon, the future of UK aviation, next steps towards an Aviation Strategy*, HMG, April 2018.

[6] *Marc Baumgartner, President and CEO International Federation of Air Traffic Controllers' Association (IFATCA)*, International Airport Review, June 2005.

[7] https://twitter.com/i/web/status/1025480184647036930

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9. The training and qualification of FISOs employed at the UK's area control centres (ACCs) – so called 'Area' FISOs – is managed and overseen by the CAA through the respective unit's training plan and competence schemes. Whilst the CAA issues licences to these FISOs based on evidence provided by the ANSP, criteria have not been established on which such licensing decisions are made; this is incorporated within the respective unit's management system. The CAA believes that this should be addressed.

10. There is significant complexity in the systems, processes and procedures in use within the CAA's Shared Services Centre (SSC) for the licensing of FISOs. This leads to confusion for FISOs, FIS ANSPs and CAA staff; can cause delays in the processing of licence applications; and make it difficult to search through the CAA's records of licence holders. FISOs, like ATCOs, provide ATS and it is reasonable to argue that the licensing arrangements for such personnel should be the same, except where a difference can be justified by a difference in their role. This mirrors the principle adopted elsewhere in the world, particularly in the rest of Europe and North America.

11. Other international activity is being undertaken that, to a greater and lesser extent, will affect FISOs in the UK. ICAO are in the final stages of developing a new Manual of AFIS which will see the withdrawal of the outdated[8] Circular 211 and will include guidance on training and competency requirements for FISOs. The European Aviation Safety Agency (EASA) has acknowledged a need to standardise adequate competence and training requirements for FISOs and that rulemaking on FISO licensing is likely in the future. Finally, the International Flight Information Service Association (IFISA) has stated that one of its objectives is to gain recognition of FISOs within ICAO Annex 1 Personnel Licensing, and has recently initiated a working group to facilitate this.

Objectives of the FISO Review

12. The objective of the CAA's review was to scrutinise policy on the training, assessment and licensing of FISOs and, if necessary, to develop concepts for the future direction of CAA policy on which we could consult with industry. The purpose of any future change to CAA policy should be to:

- contribute to the development of a fundamentally safer system, and/or maintain current levels of safety in order to deliver benefits in other areas;

[8] Circular 211-AN/128 was published in 1988 following the consideration by the Air Navigation Commission of a study undertaken by the Secretariat. This study had identified that AFIS was being provided "on a growing scale" and that "there was a definite need for a service between aerodrome control service and no service at all".

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- ensure that FISO licensing arrangements facilitate UK airspace modernisation and can adapt to the future needs of the UK's ATM system; and,
- anticipate any future European rule making activity or development of ICAO Annex 1 'Personnel Licensing' with regards to FISO licensing.

Scope of the FISO Review

13. The scope of the CAA's review was all aspects of the training, qualification and licensing of FISOs and their regulatory oversight by the CAA. In addition, the following aspects have been considered:

- The limitations currently placed on the privileges associated with a FISO licence in the UK; specifically, that FISOs are limited to the provision of FIS in uncontrolled airspace alone and that the use of an ATS surveillance system to supplement the FIS is not permitted.
- In their review of CAA FISO licensing policy, the Association of UK FISOs requested that the CAA consider the development of fatigue risk management (FRM) policy for FISOs.
- Acknowledging that any potential changes to the FISO licensing structure would result in changes to the types of licence applications made, this would necessitate an amendment to the wording of the CAA Scheme of Charges to ensure that they are aligned.
    - It is our intention to propose the types of licence applications that may be established in the future, which would thus inform the wording of the scheme of charges, and to seek the views of industry on them. These views, alongside information gathered from focussed consultation questions, will be used to inform the next phase of policy development. In the future, we may also need to propose and consult upon corresponding changes to charges to ensure that full cost recovery is achieved in line with the requirements for the CAA under the Civil Aviation Act; however, this will be achieved through our routine consultative mechanism on statutory charges.

Why are we consulting?

14. Having undertaken its review of FISO licensing policy, the CAA has developed concepts which we believe address both the drivers for change and the issues identified in the review. These are not yet firm policy proposals – they should be seen more as a 'roadmap' or 'green paper' – and we are not yet committed to the kind of wholesale change that adoption of all the concepts described herein will represent. We now seek information and opinions from our stakeholders that we will use to inform the next stage of policy development.

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Next steps

15. Subject to the outcome of this initial consultation, the project plan for the FISO Review anticipates a four-phase approach:

- Initial development – May 2017 to December 2018. Consists of stakeholder identification, literature review, concept development and discussion and consultation with industry on these future concepts for CAA policy.
- Detailed development – January 2019 to February 2020. Develop CAA consultation response document. Develop CAA policy options and supporting documentation to initiate formal consultation on the proposals.
- Implementation – March 2020 to January 2022. Development and publication of the consultation response document and CAA decision; finalisation and publication of policy documents; publication of revised Scheme of Charges; development and finalisation of any software support tools and licensing processes. A phased implementation is considered likely, with some elements extending beyond January 2022.
- Post-implementation review.

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Chapter 2 - The FISO Review

Review of 'good practice'

16. The first stage of the review was to identify and analyse 'good practice' from around the world which related, either directly or indirectly, to the licensing of FISOs. Relevant provisions from ICAO, EUROCONTROL, the EU and a number of European states were examined. Whilst many of these provisions relate directly to the licensing of aerodrome FISOs, significant parallels also exist with the licensing of 'area' FISOs.

17. The next stage was to undertake a comparative analysis between these provisions and existing UK FISO licensing requirements. This analysis identified that UK licensing policy for aerodrome FISOs differs from ICAO and EUROCONTROL guidance in that the UK does not currently require:

- Applicants for a FISO licence to successfully complete an approved training course;
- The CAA to approve a formal course of training for aerodrome FISOs;
- 'On the job training' (OJT) at an AFIS unit to be based upon a unit training plan approved by the CAA;
- An ICAO Language Proficiency assessment for aerodrome FISOs, nor specify that Level 4 (Operational) is the minimum proficiency required;
- OJT to be conducted by a nominated OJT instructor (OJTI) who holds an OJTI licence endorsement;
- OJTIs to successfully complete an approved OJTI course; and
- a minimum level of operational experience of the OJTI at the unit where they will exercise the privilege of the OJTI qualification.

18. In undertaking this comparative analysis, it became apparent that whilst the CAA issues licences to FISOs employed at the ACCs based on evidence provided by the ANSP, criteria on which such licensing decisions are made has not been established; these arrangements are detailed within the respective unit's management system and approved by the CAA through its oversight of the ATS unit.

19. Whilst FISOs are outside the scope of ICAO Annex 1, the Standards and Recommended Practices (SARPs) therein represent 'good practice' in terms of personnel licensing. It states that the Licensing Authority, in this case the CAA, should specify the licensing criteria and other requirements for the issue of a

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licence[9]. Therefore, the CAA should specify the criteria against which a licence is issued to 'area' FISOs. Moreover, the CAA sees benefits in prescribing licensing requirements and a licensing structure that is common to all FISOs which would provide clarity, parity across the 'specialisation' and, potentially, opportunities for movement within the employment market. As such, this has become one of the 'drivers for change' within the project.

20. The final stage in reviewing existing 'good practice' was a comparison of the licensing arrangements for UK ATS personnel (FISOs and ATCOs). This identified that significant differences exist between the processes associated with the two which are not justified by the differences between the role of a FISO and an ATCO. Key areas of difference are:

- **Licence format and terminology.** ATCO licences contain licence endorsements, ratings, rating endorsements and unit endorsements. FISO licences are issued to authorise the provision of FIS at either an aerodrome or an ACC – which is akin to a rating - and is then validated at a unit – akin to a unit endorsement. Given the different terminology, the format of the FISO licence differs significantly from that of the ATCO's licence. The use of different terminology and the different licence format causes confusion for Inspectors ATS and SSC personnel.

- **CAA licensing process.** Currently, the processes and systems used by the SSC to process and store FISO licence applications and ongoing licence 'maintenance' activity differ from that used to process ATCO licence applications. The system used to process and record FISO licence applications and ongoing 'validation' activity is considered by SSC staff to be onerous and confusing.

- **Validation Assessment and ongoing competence.**
  - The licence validation and arrangements for the ongoing assessment of competence of FISOs employed at the ACCs is addressed solely through the respective unit's competency schemes (UCS).

[9] ICAO Annex 1 paragraph 4.1.1 states that "before being issued with any licence or rating…[applicants other than flight crew members] shall meet such requirements in respect of age, knowledge, experience and where appropriate, medical fitness and skill, as are specified for that licence" and that "an applicant…shall demonstrate, in a manner determined by the Licensing Authority, such requirements of knowledge and skill as are specified for that licence or rating".

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- The arrangements for the licence validation of aerodrome FISOs are detailed within CAP 1032, with initial validation assessments being undertaken by CAA Inspectors (ATS) and the biennial re-validation assessment being undertaken by local AFIS Assessors (where appointed) or by CAA Inspectors (ATS). However, currently, the CAA provides no guidance on the conduct of such assessments. AFIS Assessors are approved by the CAA subject to certain conditions specified in CAP 1032 Appendix C. There are similarities in these conditions to those specified for ATC assessors; however, there are fundamental differences. There is no requirement for AFIS Assessors to have successfully completed an approved assessor course, nor to hold an Assessor licence endorsement.

- **Availability of guidance material.** A significant volume of material[10] is published by the CAA relating to ATCO training but this is not the case for FISOs. CAP 1032 Aerodrome FISO Licensing includes a syllabus for the licensing examinations and validation assessment but does not stipulate performance criteria. CAP 653 Standards for FISOs Part A provides performance criteria for FISOs employed at ACCs; however, whilst listed as current on the CAA website[11], it has not been amended since its initial issue in September 1995 and is not considered up to date by industry.

- **Composition of Training.** ATCO licensing regulations contain requirements for the provision of 'continuation training' which is designed to maintain the validity of the endorsements of the licence[12] and consists of:

  - Refresher training which is designed to review, reinforce or enhance the existing knowledge and skills of the ATCO; and,

  - Conversion training which is designed to provide knowledge and skills appropriate to a change in the operational environment, when the safety assessment of the change concludes the need for such training.

  At all stages of ATCO training, there is a requirement to deliver training in abnormal and emergency situations (ABES) and human factors (HF). The purpose of ABES training is to prepare ATCOs to recognise specific emergency and abnormal situations and to react appropriately and manage their impact on the overall operation. The purpose of HF training is to

[10] CAP 1251 Air Traffic Controllers – Licensing; CAP 584 Air Traffic Controllers – Training; the CAP 624 series Air Traffic Controllers – Performance Objectives and CAP 794 Air Traffic Controllers – Initial Performance Objectives; CAP 745 Aircraft Emergencies: Considerations for Air Traffic Controllers.

[11] http://publicapps.caa.co.uk/modalapplication.aspx?appid=11&mode=detail&id=172

[12] Reg (EU) No 2015/340 Annex I Section 1 ATCO.D.005(a)(3).

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develop the awareness and skills of the ATCO in relation to team resource management, fatigue management and stress management.

At present, there are no provisions requiring FISOs to undertake 'continuation training', or training in ABES and HF. The CAA considers that it would be appropriate to provide these types of training to FISOs.

- **Assessment of previous competence.** The CAA often receives licensing enquiries from holders of FISO licences who have not exercised the privileges of that licence for many years and are seeking advice on how they might re-validate that licence. CAA staff are then required to undertake an ad-hoc assessment of the individual's case to determine what requirements must be fulfilled. This issue is addressed in ATCO licensing through the conduct of an assessment of previous competence (APC)[13] which determines whether the holder of the licence continues to satisfy the requirements relevant to the rating/s held on that licence.

Comparison of existing FIS related operational provisions

21. The final stage of the FISO Review was to examine existing FIS related operational provisions in light of the concepts being developed as part of UK airspace modernisation activity.

UK limitations on the privileges associated with a FISO licence

22. From an ICAO perspective, an ATCO is an individual licensed and rated to provide an ATC service, alongside a FIS and an Alerting Service. Whilst the licensing of FISOs is outwith the scope of ICAO Annex 1, it follows that a FISO is an individual who provides a FIS and may be licensed to do so. Currently, UK FISOs are not permitted to provide a FIS in Class E airspace, nor to utilise an ATS Surveillance System to supplement the provision of FIS[14]. However, ICAO Doc 4444 PANS-ATM 8.11.1[15] states that the information presented on a situation display may be used to provide specific types of information to identified aircraft that are in receipt of a FIS.

23. It is anticipated that the implementation of Regulation (EU) No 2017/373 and other work to modernise UK airspace will prompt changes in airspace design and

[13] ATCO.B.001(d), ATCO.B.005(e) and ATCO.B.010(b) and associated AMC refer.

[14] Flight Information Displays (FIDs) are used by FISOs at the London and Scottish ACCs to assist in the reduction and prevention of airspace infringements and as an additional resource tool for carrying out the FISOs task at these units. The use of FIDs is subject to CAA approval and locally derived procedures but is not used as an ATS surveillance system in its 'traditional' sense.

[15] It is anticipated that PANS-ATM 8.11.1 will be transposed into European Law through Annex IV 'Part-ATS' to the ATM/ANS Common Requirements Regulation on a date which is yet to be determined but is proposed as 27 January 2022.

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classification and ATS provision within the UK, such that ATC service is provided only within controlled airspace and that greater use may be made of Class E airspace. This presents opportunities for FISOs to be utilised in the provision of FIS to a greater extent than today. In this document, we will present a concept of how the CAA considers that this may be achieved and we seek the views of our stakeholders in order to inform the next stage of policy development.

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Chapter 3 - Approach to concept development

Introduction

24. The case for change is made earlier in this document and the requirements of airspace modernisation and harmonisation with international requirements are foremost amongst these. However, having conducted the review of 'good practice' and existing FIS related operational provisions, we needed to determine whether it would be appropriate or proportionate to develop proposals to address the issues identified.

25. The CAA determined that 2 courses of action were open to us in order to address the issues identified by the review; we could:

- Develop concepts which would seek to address only those requirements resulting from our international obligations, i.e. 'the essentials'; or,
- Develop concepts that would address all the drivers for change and those issues identified in the review of 'good practice' and existing FIS related operational provisions.

'The essentials'

26. The aviation industry is usually the bearer of costs when implementing change and thus change has a direct effect on business. Through its Better Regulation principles[16], the CAA is required to ensure that our policy proposals are prepared to take account of the value, costs and benefits of alternative options for all stakeholders. Moreover, the CAA is committed to developing policy proposals which do not exceed the requirements of our international obligations[17]. On that basis, the CAA could focus its attention on only 'the essentials' which stem from those international obligations.

27. In reality however, given that the licensing of FISOs is, currently, subject to national arrangements, this could mean that we make no change as there is no obligation that compels us to adopt the 'good practice' published by ICAO and EUROCONTROL. The CAA do not believe that this would be an appropriate course of action for the following reasons:

[16] CAA website Better-Regulation principles.

[17] *CAA response to the GA Red Tape Challenge CAP 1123*, CAA, November 2013.

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- We need to ensure that FISOs and FIS providers are able to exploit the opportunities presented by a modernised air traffic management (ATM) system and the anticipated 'system wide' benefits which may be accrued through more fundamental change;
- The review has identified a significant number of differences between CAA FISO licensing policy and the 'good practice' recommended by ICAO and EUROCONTROL;
- There is a growing gap between the requirements of the users of the service provided by FISOs and the knowledge/skill requirements set by the CAA for UK FISOs; for example, in relation to IAPs. This contrast is also evident when we compare these requirements and the way in which UK FISOs are utilised with the licensing arrangements and utilisation of FISOs elsewhere in the world, particularly in the rest of Europe; and,
- importantly, the FISO industry is itself pressing for change to their licensing arrangements.

28. Change within FISO licensing arrangements provides a real opportunity to enable fundamental improvements to the way in which ATS are delivered within the UK in the future. The CAA seeks the views of its stakeholders on this course of action but it is not our preferred option.

The CAA's preferred option

29. The CAA's preferred option is to develop concepts which we can propose for the consideration of our stakeholders and that would address the drivers for change, and those issues identified in the review of 'good practice' and existing FIS related operational provisions. The rationale is clear. We wish to ensure that FISO licensing arrangements facilitate UK airspace modernisation, can better adapt to the future needs of the UK's ATM system and provide an infrastructure that supports industry, not least GA[18] and particularly recreational aviation as the prime customer of ATS from FIS providers.

In Chapter 4, we describe the concepts that the CAA has developed and, through the online consultation tool, we invite our stakeholders to comment on these. It is important to stress that, through this consultation, we are gathering information and opinions from our stakeholders that we will use in the next stage of project development. These are not yet firm policy proposals and we are not yet committed to the kind of wholesale change that adoption of all the concepts described in Chapter 4 will represent. That said, a number of the concepts are closely linked with each other and thus could not be implemented in isolation; for example, the concept of a form of 'credit' towards the attainment of an ATCOs

[18] *General Aviation Strategy*, HMG March 2015.

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licence cannot be achieved without the introduction of a formal, approved course of initial training[19].

[19] Initial training comprises basic training and rating training.

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Chapter 4 – Future concepts

Introduction

30. As stated in Chapter 3, the CAA's preferred option was to develop concepts which we could propose for the consideration of our stakeholders that would address the drivers for change, alongside those issues identified in the review of 'good practice' and existing FIS related operational provisions in Chapter 2.

31. The concepts proposed by the CAA are described below.

Training, qualification and licensing proposals

32. Based on the principle that the licensing arrangements for ATS personnel should be the same, except where a difference can be justified by a difference in their role, the CAA aspires to base its future FISO licensing policy on the processes and procedures relating to the training, qualification and licensing of ATCOs[20]. The concepts which support this aspiration are detailed within Annex A and include proposals to:

- adapt the structure of licence, ratings and endorsements and the format of licence used in ATCO licensing and apply these to FISOs;
- introduce a language proficiency requirement in order to meet the intent of ICAO requirements;
- bring the licensing of FISOs employed at the ACCs into the scope of CAA policy;
- introduce a requirement for ab-initio FISOs to successfully complete an approved course of initial training at a training organisation which satisfies the CAA's requirements, prior to undertaking on-the-job training (OJT) at a unit;
- introduce a requirement for FIS units to operate an approved unit training plan (UTP) and that OJT is provided by instructors (OJTIs) who have themselves successfully completed an approved training course;
- introduce a requirement for FIS units to operate an approved unit competence scheme (UCS) and that the assessment of competence is undertaken by individuals (Assessors) who have successfully completed an approved training course;

[20] As detailed within Implementing Regulation (EU) No 2015/340 the 'ATCO-IR' and 'Air Traffic Controllers – Licensing' CAP 1251.

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- introduce requirements for FISOs to undertake 'continuation training' and to receive training in abnormal and emergency situations (ABES) and human factors (HF);
- develop provisions which introduce the concept of an assessment of previous competence (APC) into FISO licensing.

33. Increased parity between the training, qualification and licensing provisions for all ATS personnel provides an opportunity to develop a clear path for career progression both as a FISO and between the roles of FISO and ATCO, with FISOs being able to demonstrate the attainment of prior competence in key areas of basic ATCO training. This will increase the visibility of the role of FISOs in the employment market, encouraging individuals to enter the industry and may serve to address, in part, emerging issues regarding shortages of both ATCOs and FISOs.

34. Furthermore, by basing future FISO licensing policy on the processes and procedures relating to the training, qualification and licensing of ATCOs, the CAA could achieve efficiencies in the licensing administration process by removing complexity associated with the use of different terms, processes and systems.

Expansion of FISO licence privileges

35. Currently, FISOs in the UK are not permitted to provide an ATS to VFR flights in Class E airspace, nor to use the information from an ATS surveillance system to supplement FIS. However, these limitations of the FISO licence are as much a function of the way in which FISOs are currently trained as they are about the balance of roles between ATS personnel in the UK and the way in which they're currently utilised.

36. Annex B provides greater details on the CAA's concepts for an expansion of FISO licence privileges to permit FISOs to:

- provide an ATS to VFR flights in Class E airspace; and
- utilise the information from ATS surveillance systems to support the provision of FIS.

The latter is dependent upon and supported by the development of appropriate materials for inclusion within initial courses of training.

37. As indicated in Chapter 2, the CAA anticipates that the implementation of Reg (EU) 2017/373 and other work to modernise UK airspace may present opportunities for FISOs to be utilised in the provision of FIS to a greater extent than today. The concepts described in Annex B could see UK FISOs utilised in similar ways to their counterparts in Denmark and Germany and elsewhere in Europe who provide surveillance based FIS to VFR flights in Class E airspace.

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