

Unite the Union at easyJet

EASA

Guide

2022

The information in this guide is not exhaustive and is only a snapshot of some of the Flight Time Limitations (FTL) and Fatigue Risk Management System (FRMS) procedures and rules.

Full details can be found on Docunet in:

- Section 7 – OMA – Flight Time Limitations

- Fatigue Risk Management System Procedures Manual – UK & Austrian AOC

It is important that you understand and adhere to the EASA regulations, otherwise you are at risk of fault. Our rosters are busier than they have ever been and having a good understanding of the limits we can work as crew will ensure that you can challenge duties, where necessary.

In this guide we have provided a high-level overview of the FTL/FRMS rules/procedures and have highlighted some of the more common issues/queries for your ease.

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I Fatigue Risk Management Principles

(4.5.1)

easyJet's guidance will not be exhaustive or definitive but will facilitate review of manual and optimised rosters around fatigue risk criteria, as well as assisting crew to identify elements of their roster which may require additional personal mitigation strategies.

Is my duty legal?

The below are guidelines ONLY and therefore CAN be legally rostered

- Elongated duties, (>10 hours in length) *should* be avoided on day 1 early due to short-term acute sleep loss over the prior 24-hour period.
- Elongated duties (>10 hours in length) *should* be avoided at the end of a roster block containing more than 4 duty periods due to cumulative sleep loss as the result of operating a series of consecutive duties.
- Assigning more than three consecutive four sector FDPs *should* be avoided where practical alternatives exist.
- The scheduling of rest periods *should* be considered with reference to the nature of the working block i.e., high workload elongated night flights may require more than minimum rest.
- Transitions *should* be avoided wherever possible.
- Backwards rotational shift changes, including late to early duties, *should not* be planned.
- Transitions *should not* exceed more than one per duty block, irrespective of the number of duties it contains, as operating more than one transition can lead to significant circadian disruption.
- Where a night duty is planned, this *should* be preceded by a prior late duty preferably terminating post 2300 hrs local in order to enable the crew member to adjust to the change in sleep cycle.
- Night duties *should not* be planned within the same duty block as early start reports.
- Single days off *should* be avoided wherever possible as they offer only a limited recovery opportunity.
- Where single days off are unavoidable maximum hours free from duty *should* be provided. (i.e., early duty prior to day off and late duty following).
- To avoid fatigue risk while commuting home the offer of hotel accommodation at home base is recommended following the completion of a duty period in excess of 14 hours.

II Assessing Fitness to Fly

The ability to predict future state of fitness becomes more difficult the further away an individual is from the critical point in time.

It is for this reason crew are expected to discharge their personal responsibilities and ensure that they have attempted to gain adequate rest before assessing whether they are in a fit state to operate.

Fatigue should not be claimed for more than one duty day in advance, and it should be noted that the use of FTGD or UNFT, including in combination, for two or more consecutive days is subject to automatic referral.

III Reporting Fatigued

The prime purpose of FRMS investigating a fatigue report form is to determine the probable cause of the fatigue occurrence so that lessons can be learnt which may help to reduce the risk of fatigue arising from any aspect of roster planning and implementation.

The FRMS focus is consequently on those fatigue elements that the company can reasonably be expected to control taking into account a crew member's personal responsibility to manage their rest periods appropriately.

However, where other elements outside the company's control are identified the FRF policy establishes the process by which crew members can be given the support and knowledge necessary for them to effectively assume their personal responsibility for management of fatigue.

To further encourage observance of this shared responsibility an FRF may still be submitted pre or post duty where a crew member has not claimed fatigue but has identified precursors that they wish to bring to the attention of FRMS.

Reporting Fatigued - Prior to Report

Should a crew member feel their alertness is impaired to a level which could compromise the safety of any subsequent flight, they have a responsibility, irrespective of the causal factors, to report as such to the Crewing department.

Crewing staff should not query or challenge the crew member's decision to claim fatigue or otherwise be unfit to operate

The crewing officer should annotate the crew members' roster as:

- **FTGD** – when the crew member cites fatigue due to roster related factors
- **UNFT** – when the crew member is unfit to fly due to fatigue and cites non-roster related factors
- Any other absence related code – as appropriate

The crewing officer should remind the crew member that they are required to submit a fatigue report form within 72 hours of absence.

Reporting Fatigued - After Report

A crew member can be offloaded if they or the captain of the flight consider their current performance indicates they may compromise the safe operation of the flight.

- If a crew member is offloaded due to roster related fatigue, crewing should annotate the roster with the code **FTGO**
- If a crew member is offloaded due to non-roster related fatigue, crewing should annotate the roster with the code **UNFO**
- the code **OFLD** code is used if a crew member is unable to continue operating due to a stressful event.

Reporting Fatigued - Post Duty

A crew member may still complete a fatigue report form if they feel a duty they have performed may potentially be fatiguing.

Where a crew member claims a fatigue related absence it is expected that they will use the subsequent period free from duty in order to rest and recover.

IV Fatigue Report Form Assessment

(1.6)

Fatigue reports are investigated and graded (between 0 and 5) for roster related fatigue potential by FRMS based on evidence accumulated from the report, fatigue metrics obtained from the operated or published roster and any other relevant information available to the investigator.

It is important that a crew member provides as much relevant detail as possible on the fatigue report form.

The grade represents an assessment of the roster construction characteristics that may be considered as precursors to fatigue, and which are visible on the roster. It is not intended to quantify that fatigue. It cannot reflect individual differences nor the efforts of crew members to manage their fatigue risk.

FRMS are able to refer a fatigue report form to your local base management team if they feel that the absence is not roster related fatigue or if they have any welfare concerns.

Repeated zero or low related fatigue potential findings associated with a fatigued absence are subject to possible referral.

A low roster related fatigue potential assessment within the first three months of a crew member performing operational duties will automatically be referred to your local base management.

Repeated medium and low roster related potential findings associated with a fatigued absence are subject to possible referral.

Findings of significance from an individual or operational perspective may require a telephone interview to discuss the contributory factors in more detail and, if appropriate, specialist medical assessment for long term fatigue risk.

V Days Off

Days off shall be pre-allocated at roster publication.

A single day off shall include a minimum of 36 hours including two local nights

Two consecutive days off shall include a minimum of three local nights

- a local night is a period of eight hours falling between 2200 – 0800 (L)

- a local day is a period of 24 hours commencing at 0000 (L)

A maximum of five flying duty periods in a duty block shall be planned (which may extend across 6 local days)

A minimum of two consecutive Days Off within any ten consecutive days shall be planned

A minimum of 24 Days Off shall be delivered in any 12 consecutive weeks

Working into a Day Off

easyJet's *expectation* is that a crew member should agree to work up to 0130, including debrief time.

However, you are not obliged to work into your day off.

VI Duties

easyJet Early Start Duty

a duty starting in the period 0200 to 0659 (L)

easyJet Late Finish Duty

a duty that finished in the period 0100 to 0159 (L)

easyJet Night Finish Duty

a duty that finishes in the period 0200 to 0459 (L)

*Night finish duties are limited to a maximum of **three** consecutive duties and are subject to further conditions.*

easyJet Disruptive Duties

a duty period that occurs in any part of the period 0100 to 0659 (L)

*Not more than **three** easyJet Disruptive Duties can be undertaken and neither will there be more than **four** such duties in any **seven** day period.*

Morning Duty

a duty period starting in the period 0000 to 0929 and finishing at or before 1759 (L)

Evening Duty

a duty period starting at or after 0930 (L) and finishing at or after 1800 (L)

Dual Duty

a duty period starting in the period 0000 to 0929 (L) and finishing at or after 1800 (L)

Neutral Duty

a duty period starting at or after 0930 (L) and finishing at or before 1759 (L)

VII Transitions

The change from a Morning Duty to an Evening Duty, or vice versa over consecutive Duty Periods is known as a 'Transition'.

There must be **no more than one transition** within a duty block containing 5 or more duty days

In a Morning to Evening Transition, the crew member must be off duty by 0200 (L)

A Dual Duty is a transition and may be preceded and/or followed by a Morning Duty, Neutral Duty, or an Evening Duty without it being considered as a second transition.

Disruption leading to delays on the day of operation will not constitute a violation but that change in timing must be accounted for when assessing further roster changes.

VIII Standby

The standby procedures are designed to ensure that the combination of standby and the FDP **do not lead to more than 18 hours awake time.**

The maximum amount of time spent on standby is 16 hours.
However, easyJet limits the maximum duration of Home Standby to 8 hours.

On the day of operation, it may be extended beyond 8 hours if the standby results in a call out for duty that reports after the planned end time of the standby – this is permitted.

Crew must be ready to report to the back of the security queue within 90 minutes of a standby call out.

I've been called from an early standby to do a late duty, is this allowed?

Yes, if you are contacted **after 0700** and provided you are off duty within **18 hours** it is permissible.

If you are contacted before 0700, the 18 hours starts counting from your standby start time. This may still allow for a late finish.

IX How many hours can I work?

The total **duty** hours (the bottom line on your roster) that you can be rostered cannot add up to more than:

60 duty hours in any 7 consecutive days

110 duty hours in any 14 consecutive days

190 duty hours in any 28 consecutive days

2000 duty hours during the period of 12 months expiring at the end of the month before the month in question.

Post-flight duty counts towards duty hours (30 minutes after landing and any extended off duty times)

The total **flight** hours that can be rostered is as follows:

100 flying hours in any 28 days

900 flying hours in any calendar year

1000 flying hours in any 12 consecutive calendar months

UK Civil Aviation Working Time Regulations 2004 limit this to 900 hours expiring at the end of the month in question.

For UK based cabin crew, we are currently working to a more restrictive table than EASA which forms part of the CAA approved transition plan.

Start of FDP	1 & 2	3	4	5	6	7	8	9	10
	Sectors								
0600-0759	13:00	12:30	11:45	11:00	10:30	10:00	10:00	09:30	09:00
0800-1259	13:00	12:30	12:00	11:30	11:00	10:30	10:00	09:30	09:00
1300-1329	13:00	12:30	11:45	11:00	10:30	10:00	10:00	09:30	09:00
1330-1359	12:45	12:15	11:45	11:00	10:30	10:00	09:45	09:15	09:00
1400-1429	12:30	12:00	11:30	11:00	10:30	10:00	09:30	09:00	09:00
1430-1459	12:15	11:45	11:15	10:45	10:15	09:45	09:15	09:00	09:00
1500-1529	12:00	11:30	11:00	10:30	10:00	09:30	09:00	09:00	09:00
1530-1559	11:45	11:15	10:45	10:15	09:45	09:15	09:00	09:00	09:00
1600-1629	11:30	11:00	10:30	10:00	09:30	09:00	09:00	09:00	09:00
1630-1659	11:15	10:45	10:15	09:45	09:15	09:00	09:00	09:00	09:00
1700-2159	11:00	10:30	10:00	09:30	09:00	09:00	09:00	09:00	09:00
2200-0459	11:00	10:30	10:00	09:30	09:00	09:00	09:00	09:00	09:00
0500-0559	11:15	10:30	10:00	10:00	10:00	09:30	09:00	09:00	09:00

(Appendix I – Table I.1)

X Extended Duty Periods

For some extra-long duties, the company are allowed to extend our *planned* FDP by up to **one** hour.

(Appendix J – Table J.1)

When this has been rostered, you will have a memo on your roster to make you aware of this ('e').

This is for planned duties only and cannot be used on the day of operation if you are delayed, for example.

This cannot be done more than **twice** in any 7 consecutive days.

When this is rostered your rest before and after the duty will be extended by 2 hours; or the post-flight rest will be extended by 4 hours.

You **can** be called from standby or changed on report to operate an extended FDP provided that the required rest periods have been met.

XI Rest Periods

(7.1.11)

The minimum Rest Period provided before undertaking an FDP **starting at home base** shall be **at least as long as the preceding duty period, or 12 hours, whichever is greater.**

The minimum Rest period provided before undertaking an FDP **starting away from home base** shall be **at least as long as the preceding duty period, or 10 hours, whichever is greater.**

This period shall include an 8-hour sleep opportunity in addition to the time for travelling and physiological needs.

The time allowed for physiological needs should be 1 hour.

If the travelling time to suitable accommodation is more than 30 minutes, then easyJet will increase the rest period by twice the amount of difference of travelling time above 30 minutes.

If you are called from a standby to operate a duty, your rest period is calculated from your standby start time, and not from the report time.

XII Reduced Rest

(Appendix G)

Reduced rest may only be used prior to the day of operation.

Rest may be reduced to a minimum of 12 hours at home base and 10 hours away from home base.

XIII Commander's Discretion

In the event of *unforeseen* circumstances in flight operations, which start at or after the reporting time, the commander may use commander's discretion to modify the limits on flight duty, duty, and rest periods.

The maximum daily FDP may not be increased by more than **2 hours**.

If, on the final sector within an FDP the allowed increase is exceeded because of unforeseen circumstances after take-off, the flight may continue to the planned destination or alternate aerodrome.

In the case of unforeseen circumstances which could lead to severe fatigue, the commander may reduce the actual Flight Duty Period and/or increase the rest period in order to eliminate any detrimental effect on flight safety.

The commander shall consult all crew members on their alertness levels before deciding the modification.

Can we depart going into discretion?

This is somewhat a grey area, as the answer is neither yes or no.

There are a number of variables which will influence the ultimate decision. These could include ATC slots (coming forward or going back), planned block times (overly generous/not generous enough), short cuts on route, preferential runways, taxiing time, weather conditions and re-routing, airborne holding (this list is not exhaustive).

Therefore, at times It may appear you are departing going into discretion, the above variables may mean that you do not exceed the planned maximum FDP. Whereas on other occasions you may exceed the planned maximum FDP. This will be the decision for the commander on the duty day.

The fact that there is the potential to work into discretion does not mean that you will not or cannot operate a duty.

Can I refuse to work into discretion?

(See 'Can I refuse a duty?')

Working into discretion is at the discretion of the commander. However, in a situation where working into discretion becomes applicable the commander must assess your alertness level and this must be *taken into account* in making the decision to operate into discretion.

In assessing the cabin crew's level of alertness, your ability to safely operate the aircraft is the commander's concern.

There is a difference between feeling tired and being unable to safely undertake safety procedures.

If you feel that you are unfit to operate safely then you should not rely on the commander not to exercise their discretion, but should stand yourself down, offload yourself or fatigue offload yourself.

This will be a decision for you to make – not for the commander to make.

You have a personal responsibility to ensure that you are fit to operate.

XIV Delayed Reporting

(Appendix D)

In the event of unforeseen circumstances crew members can have their report time delayed at their place of rest.

Crewing will contact and delay crew at home where possible for any delays of 45 minutes or more.

In order to be notified of a delayed report, cabin crew will be contacted **at or under 120 minutes before scheduled report time.**

Delayed reporting must be notified before the crew member leaves their place of rest.

Do I have to answer to call from crewing prior to my report time?

You are not obliged to answer the phone should crewing call you **before** your duty start time.

XV Changes on Report

It is permissible for easyJet to change you on report.
(see 'Can I Refuse a Duty?')

Should a change on your report result in a finish time of less/more than 2 hours difference to your original finish time, you are able to claim a Roster Disruption Payment
(See RDP Guide on base pages)

XVI Can I refuse a duty?

We are often asked 'Can I refuse this duty?'

Any crew member can refuse any duty and/or offload themselves at any time for any reason, including fatigue (see Reporting Fatigued – After Report).

However, to 'refuse' a duty or part of a duty at easyJet is considered to be a failure to operate when contractually obliged. It is normally followed by a managerial investigation which may lead to conduct management.

Please ensure that you protect yourselves by familiarising yourself with the contents of this guide and the applicable company policies and procedures and please ensure that you follow the correct processes when removing yourself from roster for any reason.