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Pandemic Protocols – COVID-19

Introduction

Under S.I. 460 of 2009 and Regulation EU 996/2010, the AAIU is obliged to investigate all aircraft accidents and serious incidents that occur within the Irish state, or involve an Irish aircraft in international waters, or where the AAIU provide Accredited Representation to other states investigating accidents or serious incidents involving Irish registered aircraft or Irish citizens. This is an obligation which must be upheld during the COVID-19 pandemic. The International Civil Aviation Organisation (ICAO) has prepared some guidance¹ on how to meet this obligation whilst taking due consideration of the current exceptional circumstances. The Government of Ireland, as part of its COVID-19 response, prepared a ‘Return to work safely’ protocol² for employers and employees which provides guidance on how to reduce the risk of COVID-19 transmission in the workplace. The HSE website³ also provides information on the symptoms of COVID-19, how it is spread and precautionary measures which can be taken to reduce the risk of contracting the virus. All of these guidance documents have been consulted in the preparation of this document which details the measures put in place by the AAIU to reduce the risk of contracting or transmitting COVID-19 during the course of its normal operations.

On 15 September 2020 the Government of Ireland issued, a guidance document, ‘Resilience and Recovery 2020-2021: Plan for Living with COVID-19’. The AAIU COVID-19 protocols are written with due regard to this Government guidance.

Leeson Lane Office

The Leeson Lane offices of the AAIU are part of the Department of Transport (DoT) main building, and in general, the protocols put in place for working in the office will be determined by the DoT Management Board, through its Facilities Management Unit. All AAIU staff members are required to follow these protocols and to guide visitors to the Units’ offices through these protocols. Detailed guidance is provided on the AAIU Notice Board. For contact tracing purposes, all staff members are required to

¹ <https://www.icao.int/safety/COVID-19OPS/Pages/aig.aspx>

² <https://www.gov.ie/en/publication/22829a-return-to-work-safely-protocol/>

³ <https://www2.hse.ie/coronavirus/?source=banner-www2>

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notify the Facilities Management Unit (FMhelpdesk@dtas.gov.ie) prior to attending the Leeson Lane office and to maintain their own close contact log⁴ as required by DoT HR.

In addition, two thermometers have been purchased for the AAIU offices and are located at the two entrances to the Unit. It is requested that staff members and visitors to the AAIU take their temperature when they arrive at the office and clean the thermometer with disinfectant wipes after use. If a staff member or visitor has a temperature above 38°C they should isolate immediately in a suitable room within the AAIU and arrangements should be made to transport them home. In cases where the person appears seriously ill, medical advice/assistance should be sought.

Meeting / Training Course Attendance

Where AAIU staff members are required to attend or host face-to-face meetings or training courses, the following protocols should be followed:

- Social distancing must be assured at all times (when attending external i.e. non-AAIU meetings, the AAIU staff member should contact the meeting host in advance to check that social distancing arrangements are in place).
- The details of all external meetings attended by AAIU staff members should be recorded in the AAIU calendar, for contact tracing purposes.
- The details of all internal meetings hosted by AAIU staff members should also be recorded in the AAIU calendar, and for contact tracing purposes, the meeting organiser should record the contact details of all attendees at the meeting, and should brief attendees on the reason for recording this data.
- All contact details that are recorded only for contact tracing purposes should be deleted 14 days after the meeting. This is to ensure compliance with GDPR.

Gormanston Wreckage Facility

The Gormanston wreckage facility is an aircraft hangar used for the detailed examination and testing of aircraft wreckage. It is located within the Gormanston Army Camp and only AAIU personnel have access to the hangar itself. There are occasional visitors to the hangar to carry out mandatory maintenance on lifting equipment or to assist in investigations, but these are few in number. In order to minimise the risk of COVID-19 transmission in the hangar, the following protocols are in place:

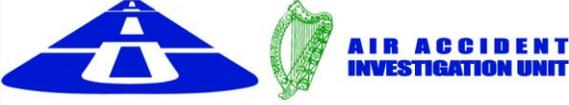
⁴ <http://thehub.department.irl/Lists/News/DispForm.aspx?ID=7412>

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- AAIU vehicles carry thermometers. It is requested that all staff members or visitors to the hangar take their own temperature before starting work and clean the thermometer with disinfectant wipes after use. If a staff member or visitor has a temperature above 38°C they should isolate immediately and arrangements should be made to transport them home. In cases where the person appears seriously ill, medical advice/assistance should be sought.
- Hand sanitation stations are located at the front and the back of the hangar. These shall be used by all personnel on arrival, and regularly during the working period. Bins, for the disposal of contaminated items are located next to both hand sanitation stations.
- Hangar door handles and lock should be cleaned with disinfectant wipes prior to leaving the hangar.
- Where possible all personnel should maintain appropriate social distance whilst working in the hangar.
- If there is a requirement to work more closely than the recommended social distance, personnel should wear face coverings for the duration of the task.
- Gloves should be worn at all times. Single-use gloves should be disposed of after one use, other gloves should be quarantined for 72 hours⁵, or washed after each use.
- Tools used should be cleaned with disinfectant wipes before and after each use by a new user.
- Bio-hazard suits or personal boiler suits should be worn whilst working on any wreckage.
- On arrival at the hangar, visitors should be briefed on this protocol and informed that they are also required to adhere to it. Appropriate PPE should be used, and provided to visitors if required. AAIU Inspectors should be mindful that visitors may not have bio-hazard training.

NOTE: Particular care should be taken with wreckage that has been in the hangar for less than 72 hours due to the risk of COVID-19 being present on aircraft surfaces in addition to standard bio-hazard precautions.

⁵ <https://www2.hse.ie/conditions/coronavirus/how-coronavirus-is-spread.html>

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AAIU Vehicles

The Government of Ireland 'Return to work safely' protocol states that:

'For necessary work-related trips, the use of the same vehicle by multiple workers is not encouraged. The number of workers who share a vehicle – simultaneously or consecutively should be kept to a minimum as far as is reasonably practicable, for example by assigning a vehicle to a fixed team.'

AAIU vehicles are assigned to a small, fixed team of 10 staff members. Due to the operational requirements of the Unit (i.e. one Inspector on call with support from other available staff as required), it is not possible to assign each vehicle to a smaller group. However, in order to minimise the risk associated with sharing vehicles, the following measure have been put in place:

- Where possible, the on-call vehicle is alternated each week.
- A maximum of two people should travel in each vehicle.
- Social distancing is not possible in AAIU vehicles. However, occupants ~~people~~ should sit as far apart as possible, and both driver and passengers should consider wearing face masks for the duration of the journey. If at any stage during the journey the wearing of a face mask causes significant discomfort or distraction to the driver, they should stop as soon as safely possible for a break or to hand over driving responsibility to the passenger
- Staff members should travel to and from a site in the same vehicle.
- Any staff members who have particular vulnerabilities should be facilitated in travelling alone if they wish (either by use of an extra AAIU vehicle or by travelling in their own vehicle).
- Vehicle surfaces that are frequently touched (e.g. door handles, steering wheel, gearstick, dashboard buttons, mileage book, etc.) should be cleaned with disinfectant wipes prior to use by a new driver and at the start of each new journey. Inspectors should use their own pens and notebooks.
- Thermometers are available in each equipped vehicle and staff members should ensure they do not have a fever (higher than 38°C) prior to each journey. The thermometer should be cleaned with disinfectant wipes after each use. Any person with a temperature higher than 38°C should not travel and immediate arrangements should be made to transport them home or seek medical assistance for them, as appropriate.

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Accident Sites

AAIU Inspectors of Air Accidents receive training in hazard awareness at accident sites. This is refreshed every two years and includes awareness of risks associated with airborne pathogens. The following measures are in addition to standard on-site hazard protocols.

- The number of personnel on site should be kept to a minimum which shall be determined by the Investigator-in-Charge (IIC).
- For contact tracing purposes, the IIC shall ensure that there is a record of all personnel on site. Where an agency (e.g. the fire service) deploys a team to the site, the IIC only need record the contact details of the lead agent (e.g. the Chief Fire Officer), as they will be able to contact trace their own team.
- All AAIU Inspectors on site shall maintain their own close contact log as required by DoT HR.
- Wherever possible, the government recommended social distance should be maintained at all times.
- If social distancing cannot be assured, light masks should be worn.
- However, when higher risk tasks, (such as moving wreckage) are being undertaken, communication may need to be prioritised during the lift itself. If wearing masks⁶ compromises the communication between those involved in the task, then the participants should consider removing their masks and replacing them as soon as the task is complete. The IIC should ensure that all participants in the lift are briefed at a safe social distance prior to the lift so that the duration of the lift is minimised.
- Gloves should be worn at all times.
- Single-use gloves should be disposed of immediately (using bio-hazard bags).
- Other gloves should be stored in bio-hazard bags before being washed or quarantined for 72 hours as appropriate.
- Bio-hazard suits should be worn if working in an enclosed space.
- Hand sanitiser is available in each vehicle and should be used before removing any item from the vehicle and before getting back in to the vehicle.

⁶ Note that this refers only to masks that are worn to reduce the spread of COVID-19. Masks that are worn for other reasons e.g. due to dust, carbon fibres, post-fire fumes must be risk-assessed separately.

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- Tools used should be cleaned with disinfectant wipes before and after each use by a new user. Evidence (aircraft parts, flight recorders etc.) should be bagged before being placed into AAIU vehicles.

ACCREP Role (Foreign Investigations)

Under normal circumstances, Investigations initiated by foreign states which involve Irish registered aircraft, or involve a significant number of Irish citizens may require an AAIU Inspector to travel to the foreign state and participate in the Investigation as an accredited representative. Due to the extra risk caused by the COVID-19 pandemic, the ACCREP role should be carried out remotely wherever possible (i.e. non-travelling), making full use of tele and video-conferencing services. The decision on whether or not it is appropriate for an Inspector to travel will be taken by the Chief Inspector of Air Accidents, in consultation with the Inspector involved, and, if deemed necessary, with advice from the Department of Foreign Affairs and the Department of Health.

Before an Inspector travels to a foreign state, they should be briefed on the COVID-19 restrictions in place in that state. They should also carry with them all PPE that will be required for the duration of their visit, or make arrangements to have this provided by the host agency.

ACCREP Role (National Investigations)

When an accident or serious incident occurs within Ireland, the AAIU Inspector-on-Call should communicate the details of the accident or serious incident to the foreign agencies involved (determined by ICAO Annex 13 protocols) as expeditiously as possible so that the foreign agency can decide if it is appropriate for their Inspector to travel and participate in the Investigation. Where a non-travelling ACCREP is assigned, the AAIU will ensure that regular communications (video or tele conferences) are held with the ACCREP to apprise them of progress on the Investigation.

Where a travelling ACCREP is assigned to the Investigation, the AAIU Investigator-in-Charge will ensure that:

- The travelling ACCREP is briefed on the AAIU protocols associated with the COVID-19 pandemic and understands what will be required of him / her when working in the AAIU offices, at Gormonston, on an accident site and whilst travelling with AAIU staff members.
- Provide appropriate PPE for the ACCREP if they do not have their own.

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Management of Flight Data Recorders

Leeson Lane Recorder Room

When working in the Leeson Lane recorder room, the following protocols should be observed:

- Wherever possible, a maximum of two people should be present in the recorder room and should maintain an appropriate social distance.
- If more than two people are required to be in the recorder room (e.g. to witness a recorder download), then face coverings should be worn by everyone present in the room.
- Gloves should be worn when downloading recorders unless the recorder has been quarantined for more than 72 hours.
- Shared computers, download equipment, download cables, etc. should be cleaned with disinfectant wipes before and after use by a new user.

Download of Flight Data Recorders by Foreign Agencies

In some circumstances, particularly where a flight recorder is damaged, it may be necessary to transport the recorder to a foreign state for download. Due to legislation regarding the protection of flight data recorders, the recorder must be personally transported by an Inspector of Air Accidents.

In these instances, there are two possible courses of action:

- An AAIU Inspector may carry the recorder to the foreign state and hand it to a representative of the Safety Investigation Authority of the foreign state in the airport, before immediately returning to Ireland.
- An AAIU Inspector may travel with the recorder to the Safety Investigation Authority of the foreign state and witness the recorder download before returning to Ireland.

It is important to first determine the availability of the foreign state recorder facility and what specific COVID-19 restrictions and/or protocols are in place in the particular state.

In addition, it should be noted that the AAIU maintains a Service Level Agreement with the Defence Forces for movement of Inspectors and equipment at short notice in support of the Air Accident Investigation process. The AAIU will seek to use this SLA with the Defence Forces as the primary method of moving recorders and inspectors in order to minimise potential exposure to COVID-19.

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The Chief Inspector of Air Accidents, in consultation with the relevant Inspector, and, if deemed necessary, with advice from the Department of Foreign Affairs and the Department of Health, will determine the most appropriate course of action. The decision will take into consideration the COVID-19 risk in the destination state, any quarantining requirements in the destination state and when returning to Ireland, and any medical vulnerabilities of the Inspector involved.

The Inspector charged with transporting the recorder will ensure that he/she observes any COVID-19 requirements which are in place in the destination state.

Witness Interviews

During the course of an Investigation it is usually necessary for Inspectors to interview those who were involved in, or witnessed an accident or incident. For interviews conducted on-site, or close to the scene of an accident, where social distancing cannot be assured, inspectors should wear face coverings and should brief the witness on this AAIU protocol prior to the interview. Follow-up interviews or interviews conducted at a later date should be carried out by web or tele-conference wherever possible. However, certain interviews that are of a sensitive nature (e.g. with the relatives of fatalities, with Pilots of aircraft in serious incidents or accidents) may still need to be carried out in person. In these cases, the following guidelines should be applied:

- Social distancing must be possible and achieved throughout the interview.
- If the interview is to be held at the AAIU offices, the conference room should be used and attendees must be given allocated (appropriately spaced) seats.
- Attendees should be asked to use hand sanitiser and take a temperature measurement on arrival.
- When carrying out interviews in an off-site location, an appropriately sized room, which can accommodate the required social distancing shall be used.

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Useful Contacts

HSE Live Advisory Service	1850 24 1850
Emergency Medical Assistance	112
Department of Health	www.gov.ie/health
Department of Foreign Affairs General Travel Advice	https://www.dfa.ie/travel/travel-advice/
Department of Foreign Affairs Emergency Queries	00353 1 4082000