**Non-complex Approved Training Organisation**

**Guidance for Compliance Monitoring Audits, Findings**

**and Audit Scheduling**

The attached information has been written with the purpose of being complementary to the CAA ATO Template Manual. They provide an example of a Compliance Monitoring checklist / audit report that could be utilised by a small ‘non-complex’ ATO offering training for the LAPL, PPL and associated ratings. Also included is a sample Findings form which also enables corrective and preventative actions to be tracked and, finally, a sample audit schedule.

It should be noted that the audit checklist / report has been designed around the regulatory requirements laid down in Part ORA and the content of the CAA ATO Template Manual. Whilst ATOs may adopt the checklist in part or as a whole it is the Organisations responsibility to ensure that all content is appropriate for their own purposes. Furthermore, it is envisaged that the individual items and audit questions should be enhanced and further developed over time to adapt the audit more specifically to the activity of the ATO in question. If the ATO employs any Flight Synthetic Training Devices during it’s training courses, the checklist / report should be enhanced to include items on such devices. The Authority can provide further guidance if required.

The Audit finding form has been designed to provide not only a notification of any issues found during the audit, but also the agreed action to correct the issue and prevent a re-occurence. It also enables the ATO to show that the effectiveness of corrective / preventative actions has been verified. The categories of findings on this form should be based upon the EASA standard definitions as per Part ARA, as follows:-

A level 1 finding shall be issued by the competent authority when any significant non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation’s procedures and manuals or with the terms of an approval or certificate which lowers safety or seriously hazards flight safety.

The level 1 findings shall include:

(1) failure to give the competent authority access to the organisation’s facilities as defined in ORA.GEN.140 during normal operating hours and after two written requests;

(2) obtaining or maintaining the validity of the organisation certificate by falsification of submitted documentary evidence;

(3) evidence of malpractice or fraudulent use of the organisation certificate; and

(4) the lack of an accountable manager.

A level 2 finding shall be issued by the competent authority when any non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation’s procedures and manuals or with the terms of an approval or certificate which could lower safety or hazard flight safety.

The sample Compliance Monitoring program schedule gives an example of how the different elements of the audit may be split over the calendar year. However, it is entirely acceptable for all elements to be conducted in a single audit. It is recommended that a single audit in conducted well in advance of the Authority conducting ATO Oversight visits as it will enable the ATO to deal with any internal findings, thus proving the effectiveness of their own system.

**COMPLIANCE MONITIORING AUDIT CHECKLISTS –**

**MANAGEMENT & ADMINISTRATION**

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| **#** | **SUBJECT** | ** / X** | **REMARKS** |
|  | **MANAGEMENT AND ADMINISTRATION** |  |  |
| 1 | Does the management structure accord with the ATO Operations Manual?  *(insert OM reference here)* |  |  |
| 2 | Is the Head of Training suitably approved by the Authority?  *AMC 2 ORA.ATO.210 (a)* |  |  |
| 3 | Is the Chief Flying Instructor properly qualified?  *AMC 2 ORA.ATO.210 (b)* |  |  |
| 4 | Does the Accountable Manager have overall responsibility for the ATO, is he qualified and approved.?  *ORA.GEN.200 (a)* |  |  |
| 5 | Is the Safety Manager qualified / trained and approved.?  *AMC 1 ORA.GEN.200 (c) Management system* |  |  |
| 6 | Are sufficient Flight and Ground Instructors employed to maintain satisfactory student instructor ratios? |  |  |
| 7 | Is the Safety Management System promoted among the staff?  *AMC 1 ORA.GEN.200 (a) (2) (3) Management system* |  |  |
| 8 | Are the Flight Instructors properly qualified and current? |  |  |
| 9 | Have the senior management and staff received SMS training?  *AMC1 ORA.GEN.200 (a) (4) Management system*  *SMS Manual reference?* |  |  |
| 10 | Are the safety management meetings documented in accordance with the SMS manual?.  *SMS Manual reference?* |  |  |
| 12 | Are the Training Manuals up to date, pertinent and in the correct format?  *AMC1 ORA.ATO 230 (a) Training manual.* |  |  |
| 13 | Is the training programme to the correct format and freely available to staff and trainees?  *AMC1 ORA.ATO.125* |  |  |
| 14 | Is the Operations Manual up to date and pertinent to the ATO operation?  *AMC1 ORA.ATO 230 (b) Training manual.* |  |  |

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| 16 | Is there an effective system for checking that students fulfil all requirements before entering training?  *AMC1 ORA.ATO.145 Pre-requisites for training* |  |  |
| 17 | Is there an effective Management System within the ATO?  AMC1 ORA.GEN.200 (a) (4) Management system |  |  |
| 18 | Are the instructors duty and training hours in accordance with the operations manual?  *Operations manual reference?* |  |  |
| 19 | Are the trainee duty and training hours in accordance with the operations manual?  *Operations manual reference?* |  |  |
| 20 | Are the Operations and Training Manuals made available to all staff and trainees and is there a system to ensure that both groups are familiar with the contents?  *Management System 1.2.12* |  |  |
|  | **FACILITIES AND ACCOMODATION** |  |  |
| 1 | Is there adequate and properly equipped Flight Operations accommodation?  *AMC” ORA.GEN.215 (a) Facility requirements* |  |  |
| 2 | Are there adequate numbers of briefing and lecture facilities available for the number of students?  *AMC” ORA.GEN.215 (a) (2)* |  |  |
| 3 | Do trainees have free access to flight planning information. (AIP, AICs, NOTAMS, Weather, etc.)  *AMC” ORA.GEN.215 (a) Facility requirements.* |  |  |
| 4 | Do trainees have free access to ATO publications (Operations Manual and Training Manuals)?  *AMC” ORA.GEN.215 (a) Facility requirements* |  |  |
| 5 | Are all operations, training and planning documents up to date and pertinent to the courses provided?  *AMC” ORA.GEN.215 (a) Facility requirements.* |  |  |
| 6 | Does the aerodrome meet the published requirements and is suitable to accommodate flight training?  *AMC1 ORA ATO140* |  |  |
|  | **AIRCRAFT AND EQUIPMENT** |  |  |
| 1 | Are the aircraft used for training equipped and maintained to a suitable standard (Record registration of those aircraft which were checked)?  *AMC1 ORA.ATO.135 Training aircraft.* |  |  |
| 2 | Are the aircraft documents correctly maintained and available to the PIC for inspection?  *Operations manual reference* |  |  |
| 3 | Are aircraft defects recorded and in accordance with the operations manual?  *Operations Manual reference?* |  |  |
| 4 | Are there suitable RT training and testing facilities within the ATO?  *AMC1 ORA.GEN.215 Facilities* |  |  |
| 5 | Does a process exist whereby the Head of Training ensures that new training aircraft are suitable for the intended training course? |  |  |
| 6 | Does the process ensure that the CAA are notified of new training aircraft? |  |  |
| 7 | Are Tech Logs / Flight Authorisation sheets completed fully and accurately?  *Operations Manual Reference?* |  |  |
| 8 | Do all aircraft contain the relevant documentation  *Operations Manual 1.10.2* |  |  |
|  | **FLIGHT AND THEORY TRAINING** |  |  |
| 1 | Was the published training programme followed both as to total hours and order of exercises? (Record names of those trainees whose records were checked)  *AMC ORA.ATO.120 (a) (b)* |  |  |
| 2 | Were training records correctly and fully completed? (Record names of those trainees whose records were checked)  *AMC1 ORA.GEN 220 (b) Record keeping.* |  |  |
| 3 | Are the training records retained for the required duration?  *AMC1 ORA.ATO.120 (a) (b)* |  |  |
| 4 | Were skill tests conducted by a qualified examiner not connected with the candidates training? |  |  |
| 5 | Were all trainees invited to complete a customer feedback form/course critique?  *Your reference?* |  |  |
| 6 | Are the ground school hours recorded for the LAPL/PPL?  *AMC ORA.ATO.120 (a) (b)* |  |  |
| 7 | Do all trainees records show evidence of classroom instruction for the theory training?  *AMC1 FCL115; FCL120 LAPL*  *AltMoC1 FCL210; FCL215 PPL*  *Training Manual reference?* |  |  |
| 8 | Do the training records comply with the format specified in the Training Manual appendices? |  |  |
| 9 | Are all trainees formally assessed as having sufficient knowledge of the relevant syllabus prior to entry to the Theoretical Knowledge Examinations?  *Training Manual reference?* |  |  |
| 10 | Were minimum flight training hours achieved for all trainees?  *FCL110A or FCL210A* |  |  |
| 11 | Where trainees were identified as requiring further training was the procedure followed as per the manual?  *Training Manual reference?* |  |  |
| 12 | Were all training flights authorised in accordance with the company procedure?  *Operations Manual 1.5* |  |  |
| 13 | Is there evidence that emergency drill and essential safety exercises are being taught in accordance with the training plan?  *Training Manual Para 1.7* |  |  |
| 14 | Did the student meet all specified requirement before:-   1. First solo 2. First solo cross-country   *Training Manual Paras 1.7.4 / 1.7.5* |  |  |
| 15 | Was SRG Form 2128 completed, recommending the trainee for the licence skills test, prior to the event?  *FCL.030b and Training Manual 1.8.3* |  |  |
|  | **INSTRUCTOR STANDARDISATION** |  |  |
| 1 | Is there an effective method of assessing and maintaining instructional standards?  *Operations manual Section 4* |  |  |
| 2 | Is there an effective standardisation and staff training program in accordance with the Operations manual?  *Operations manual Section 4.* |  |  |
| 3 | Are the instructors logbooks kept up to date and in accordance with the Operations manual?  *AMC1 FCL 050 (a)*  *Operations manual reference?* |  |  |
| 4 | Does the ATO submit to the CAA and maintain a list of Examiners for the conduct of the skill tests?  *Training Manuals* *reference?* |  |  |
| 5 | Is instructor initial, refresher and standardisation training conducted in accordance with the published procedures?  *Operations Manual Part 4* |  |  |
|  | **COMPLIANCE MONITORING SYSTEM** |  |  |
| 1 | Are audits being completed in accordance with the program specified in the Compliance Monitoring System?  *CMS reference?* |  |  |
| 2 | Is the auditor independent of the area(s) which are being audited?  *AMC1 ORA GEN 200(a)(6) Para c6* |  |  |
| 3 | Do the audits completed cover all aspects of the ATO, specifically the Regulatory requirements and internal procedures?  *AMC1 ORA GEN 200(a)(6) Para b* |  |  |
| 4 | Where previous audits identified non-conformances, have these been resolved in a timely manner? |  |  |
| 5 | Where corrective or preventative action was identified on previous findings, has this subsequently been checked and found to be effective? |  |  |
| 6 | Where any changes requiring prior approval of the Authority have been identified, was approval sought?  *Organisation Manual, Para 1.2.6* |  |  |
| 7 | Is there an effective system for document control in place?  *AMC1 ORA.GEN.200 (b) (5)* |  |  |
| 8 | Are document / version control procedures being followed when manual revisions are made? |  |  |
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| --- | --- |
| Audit conducted by (print name) | Position held |
| Signature | Date |

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Audit Ref:  Insert reference for the audit | | | Non-Conformance / finding No.(unique # for this finding) | | | | | | | | Date:  (date audit took place) | | | |
| Non-Conformance / finding Ref (EASA /OM / TM / MS.): (what is it a finding against?) | | | | | | | | | | | | | | |
| Nature of Non-Conformance / finding  (describe what was founf and why it is a non-conformance) | | | | | | | | | | | | | | |
| Category of non-conformance/ finding | | | | One | | |  | | Two |  | | Suggestion for improvement | |  |
| Area of non-conformance / finding | | | | | | | | | | | | | | |
| Aircraft | | | | |  | Publications | | | | | | |  | |
| Accommodation | | | | |  | Synthetic Training Devices | | | | | | |  | |
| Course Material | | | | |  | Training Programmes | | | | | | |  | |
| Compliance Monitoring System | | | | |  | Training Record | | | | | | |  | |
| Document Control | | | | |  |  | | | | | | |  | |
| Signed: | | (signature of person raising the finding)  Auditor | | | | | Accepted: (HT should sign to agree / acknowledge finding)  Head of Training | | | | | | | |
| Agreed Corrective Action  (What is intended to be done to fix the problem and prevent a re-occurence) | | | | | | | | | | | | | | |
| Agreed Completion Date: (when by) | | | | | | | | Person responsible: (who will do it?) | | | | | | |
| Corrective Action Verified as effective  (ideally the person who raised the finding should go back oafter the completion date and re-audit to see if the problem has been fixed (the action was effective) and whether it has re-occured subsequently. This means the auditor cannot have the issue assigned to him/her to actually fix the problem) | | | | | | | | | | | | | | |
| Date: (date re-auditted) | | | | | | | | CMM / Auditor: (by auditor) | | | | | | |
| Signed: | Head of Training | | | | | | | | | | | | | |

**SAMPLE COMPLIANCE MONITORING PROGRAM SCHEDULE**

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|  | JAN | FEB | MAR | APR | MAY | JUN | JUL | AUG | SEP | OCT | NOV | DEC |
| Management and Administration | **X** |  |  |  |  |  |  |  |  |  |  |  |
| Aircraft / Equipment |  |  | **X** |  |  |  |  |  |  |  |  |  |
| Facilities (classrooms / airfield etc) |  |  | **X** |  |  |  |  |  |  |  |  |  |
| Training Programs and records |  |  |  |  |  |  |  |  |  | **X** |  |  |
| Instructor Standardisation |  |  |  |  | **X** |  |  |  |  |  |  |  |
| Compliance Monitoring System |  |  |  |  |  |  | **X** |  |  |  |  |  |

The above is an example of how audits may be split across a calendar year. If the Organisation is very simple, with few employees, aircraft and facilities it is acceptable to conduct the audit once annually, with all aspects of the operation checked on the same audit. If the organisation uses the services of 5+ instructors, has a number of aircraft, classrooms and has a high throughput of students it may be more appropriate to spread the various facets of the audit schedule over several events per year.

However the audits are conducted it is *recommended* that it would be good practice to conduct audits several months before the Authority conducts oversight audits. By doing so, the Organisation will have time to undertake corrective actions on any findings raised internally and re-audit to ensure no re-occurence.