Safety and Airspace Regulation Group

Licensing & Training Standards Approvals

Standards Document 55, Version 2

European Aviation Safety Agency Flight Crew Licensing

Guidance Criteria for the Approval of Training Organisations Offering Courses of Training for Pilots Licences, Ratings and Certificates

Contents

Appendices

Foreword

The purpose of this document is to provide guidance for organisations or persons seeking to apply for Approval as an Approved Training Organisation [ATO] to conduct courses of training for pilot licences, ratings or certificates, whose principal place of business and registered office are located in the United Kingdom.

Where organisations are not located in the United Kingdom, and therefore their principal place of business is not in the UK, organisations should apply to either the competent authority for the EU State in which they are based or, if they are located outside of an EASA State, the European Aviation Safety Agency at the following address;

European Aviation Safety Agency
Flight Crew Licensing Organisation Approvals
Postfach 10 12 53
D-50452 Köln,
Germany

E mail: fcloa@easa.europa.eu
Website: www.easa.europa.eu

This document and other CAA Standards Documents are available on the CAA website at www.caa.co.uk/fclstandards and can be downloaded without charge.

It should be noted that this document is subject to change as information is disseminated from the European Aviation Safety Agency or from other National Regulation.

If, after reading this document, you still have queries please contact Licensing & Training Standards Approvals Support at the Civil Aviation Authority:

Licensing & Training Standards
Approvals Support
Aviation House
Gatwick Airport South
West Sussex RH6 0YR

Tel No: +44 (0)1293 573585
Fax No: +44 (0)1293 573996

Email: ltsapprovals@caa.co.uk

Glossary of Abbreviations and Terms

AMC	Acceptable Means of Compliance
ANO	Air Navigation Order
AoC	Assessment of Competence
ARA	Authority Requirements for Aircrew
ATO	Approved Training Organisation
ATC	Air Traffic Control
ATPL	Airline Transport Pilot Licence
CAA	Civil Aviation Authority (UK)
CFI	Chief Flying Instructor
CTKI	Chief Theoretical Knowledge Instructor
FSTD	Flight Simulation Training Device
FI(R)	Flying Instructor Restricted
IR	Instrument Rating
LAPL	Light Aircraft Pilot Licence
LSI	Licensing Standards Inspector
L&TS	Licensing and Training Standards
HT	Head of Training
JAR	Joint Aviation Requirements
MTOW	Maximum Take-off Weight
MCC	Multi Crew Co-operation
MCCI	Multi Crew Co-operation Instructor
MPA	Multi Pilot Aircraft
MPH	Multi Pilot Helicopter
MEP	Multi Engine Piston
MPL	Multi-crew Pilot Licence
NAA	National Aviation Authority
OEB	Operational Evaluation Board
OM	Operations Manual
OMM	Organisations Management Manual
ORA	Organisation Requirements for Aircrew
OSD	Operational Suitability Data
PPL	Private Pilot Licence
RTF	Registered Training Facility
TM	Training Manual
TRTO	Type Rating Training Organisation
TRI	Type Rating Instructor

SMS	Safety Management System
STI	Synthetic Training instructor

Part 1:

1. Introduction

1.1 Current Legislation and Status

1.1.1 The EASA Aircrew Regulation, Commission Regulation (EU) No 1178/2011 of 3 November 2011 lays down the technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council. This was amended as of 30 March 2012 by Commission Regulation (EU) No 290/2012 to include Parts Organisation Requirements for Aircrew [ORA] and Authority Requirements for Aircrew [ARA].

1.1.2 The Aircrew Regulation came into force on 8 April 2012 with an implementation date in the UK of 17 September 2012.

1.1.3 On the 8 April 2012 EASA became the competent authority for organisations previously approved by the UK CAA whose principal place of business is located outside of the EU.

1.1.4 Requirements for approval of Approved Training Organisations (ATO) are laid down in the Aircrew Regulation Part ORA and the AMCs to Part ORA. Information regarding the training to be completed for the issue of a licence, rating, certificate or authorisation is laid down in Part FCL and the AMCs to Part FCL. Further information is published by the UK CAA in CAP 804.

1.1.5 ATOs that were previously Registered Training Facilities (RTFs) before 17 September 2012 shall be deemed to hold a certificate issued in accordance with the Regulations. A RTF seeking to change the scope of their certificate or terms of approval must follow the procedure listed at Commission Regulation (EU) No 290/2012 article 10a.

1.2 Transition Period and Grandfather Rights

1.2.1 Organisations already approved for flight or type rating training under JAR-FCL regulations or registered with the UK CAA for PPL training before 17 September 2012, have until 8 April 2014 for Approved Training Organisations and 8 April 2015 for RTFs to comply with the requirements of the EASA Aircrew Regulation.

1.3 Purpose of this Document

1.3.1 This document is intended to serve the following purposes:

- help new organisations ensure that an application made for an initial approval will satisfy EASA Part-ORA requirements;

- assist current JAR-FCL organisations ensure that applications to vary their approval will satisfy EASA Aircrew Regulations;

- explain administrative arrangements and legal matters particular to the United Kingdom;

- ensure the process and procedures are understood by the organisations the CAA regulates, and to ensure continued compliance and approval as and when there are any appropriate or necessary changes to the organisations; and

- help RTFs seeking to become ATOs gain approval.

1.4   National Licence or Type Rating Courses

1.4.1   Organisations applying for the approval of a National licence or type rating course for Annex II aircraft under article 77 of the Air Navigation Order 2009, must meet the same requirements as for an equivalent Part-ORA approved course and therefore the same requirements referred to below will apply to the applicant for a national approval.

1.4.2   Training for National licences, such as NPPL, will continue unaffected by EU Regulations but will be kept under review by the Authority and the organisation sponsoring the training.

1.5   General

1.5.1   All organisations offering courses to which information in this document relates must be approved as an ATO.

1.5.2   Organisations seeking approval are to be in possession of the latest version of EASA Aircrew Regulation Part-FCL, Part-ARA, Part-ORA and CAP 804.

1.5.3   This document must be read in conjunction with the relevant provisions of EASA Aircrew Regulation Part-FCL, Part-ARA and Part-ORA and CAP 804. Part-ORA provides for a National Aviation Authority (NAA) to approve an organisation that satisfies the requirements. Part-ARA designates the NAA as the competent authority (the CAA is the designated competent authority in the UK) to approve an organisation.

1.5.4   Nothing in this document is intended to conflict with the EASA Aircrew Regulation or UK statute law where applicable. Whilst every effort is made to ensure that all information is correct at time of publication, the CAA reserves the right to amend this document as required to accommodate changes to the primary authority documents, to correct errors and omissions or to reflect changes in national policy and best practice.

2.   Basic Approval / Accreditation Process for All Applicants

2.1   Prior to Application

2.1.1   The following information should be considered prior to application**:**

- An ATO is considered to be a single organisation staffed, equipped and operated in a suitable environment offering flight training, synthetic flight instruction and/or theoretical knowledge instruction.

- An ATO may be approved to conduct more than one kind of approved training course. However, the CAA will require that arrangements put in place to conduct a combination of courses are satisfactory.

- An ATO contracting activities must meet the requirements of ORA.GEN.205, AMC1 ORA.GEN.205 and GM1 ORA.GEN.205.

- Where training is conducted at multiple locations, all sites will be subject to approval and oversight.

2.2   Approval of Flying Training Organisation in a Non-EASA State

2.2.1   A training organisation operating in a non-EASA Member State seeking to become an EASA approved ATO shall make an application in accordance with ORA.GEN.115 and ORA.ATO.105 using application form "Application for a Part-ORA ATO Approval" (FO.FCTOA.00010). This Application form must be sent direct to EASA [Regulation (EC) 216/2008 Article 21(1)(b)] by surface mail, fax or e-mail, (via the email box indicated on the EASA website). The Agency will elect to either carry out the approval activity itself or will allocate the task to the NAA of an EASA Member State which may or may not be the UK CAA.

2.3   Overseas Training

2.3.1   An application from an ATO whose principal place of business is in the UK, for approval of additional sites based outside the UK must be made in accordance with ORA.ATO.105.

2.3.2   All costs associated with the approval of overseas bases will be recovered by the UK CAA, upon invoice request.

3.   Preparation for Initial Approval or Variation to an Existing Approval

3.1   Timescales and Fees

3.1.1   When making an application for an initial approval, or to vary an existing approval, an ATO should ensure that any documents provided are both complete and accurate. The application material should also clearly demonstrate full compliance with all relevant Part-FCL and Part-ORA requirements. Applications for courses of type rating training must also demonstrate compliance with any training requirements identified in the OEB/OSD report for aircraft type concerned. Applications are processed in order of receipt, any omissions or errors in submitted material will delay the approval process.

3.1.2   The fees payable on application are published in the Personnel Licensing Scheme of Charges which can be found on the CAA website at www.caa.co.uk/ors5. These cover a minimum number of hours spent by CAA staff on assessing the application including the conduct of an audit where required. Hours in excess of these, will be invoiced monthly in arrears to the applicant ATO.

3.1.3   Fees in relation to the continuation of an existing approval will be invoiced on 1st April of each year, and any courses or FSTD or bases added during the duration of any given year will be included in the next charge levied.

3.1.4   Fees paid in relation to an application which is subsequently cancelled, either by the applicant or by the CAA in cases where no action is taken by the applicant for a period of 12 months or more, may be refund in part in accordance with the CAA policy on refunds which is available on the CAA website.

3.2   Language

3.2.1   The CAA will only approve courses prepared and delivered in the English language. All course material, including any documentation or records required, shall be in English. Training Organisations shall ensure that students, for whom English is a second language, have a comprehensive understanding of spoken and written English before admitting them onto a course.

3.2.2   Where the course is conducted in a non-English speaking State, the HT shall ensure, before the commencement of the course, that students are capable of understanding and interpreting aeronautical and other information promulgated by

or on behalf of that State, concerning flight safety or related to the conduct of the course.

3.3   Items Required for Submission for Initial Application

3.3.1   In addition to the requirements listed in ORA.ATO.105 Application and its AMC the additional following items must be submitted:

- Confirmation of Legal Entity of the applicant organisation e.g. a copy of the company registration document for limited and public limited companies (see Appendix C)

- Relevant and signed application form

- Relevant application fee as detailed in the Personnel Licensing Scheme of Charges (www.caa.co.uk/ors5)

- Key Post-holder Nomination forms with CVs detailing relevant experience

- CAA checklist for Operations Manual (Appendix D)

- CAA checklist for Training Manual (Appendix E)

- Proof of availability of aircraft, FSTD, facilities and staff for the approved courses to be conducted. Where these are not permanently available to the ATO, copies of Hire Agreements, contractual arrangements etc must be provided

- Evidence of sufficient funding comprising of

  o Current balance sheet
  o Signed statement from company accountants stating 'Going Concern' and no reason not to meet forecast in the business plan
  o 3 year business plan, with month by month breakdown of projected income and expenditure

- Copies of FSTD qualification certificates

- Theoretical Knowledge Instructor/ Subject allocation (primary and secondary subjects)

- All manuals should have an effectual means of document control and a list of effective pages (Appendix G)

3.3.2   It is important that ATOs provide a single email address to be used for all communication between the Authority and the organisation.

3.4   Additional Items in support of Initial Application

3.4.1   The following information is to be included either on the relevant application form or in the Operations or Training Manual as appropriate and directed by the manual checklists. Where it is not contained on the application form however, these items should be submitted with the items previously listed:

- A detailed management structure. ORA.GEN.200

- Personnel requirements. ORA.GEN.210 and ORA.ATO.110.

- A description of the accommodation; a floor plan with dimensions and purpose of individual rooms is usually appropriate. AMC1-2 0RA.GEN.215

- Description of the training programme which must comply with the requirements of Part-FCL and, in the case of flight test training, the relevant requirements of Part-21. ORA.ATO.125, AMC1 ORA.ATO.125, AMC2 ORA.ATO.125, AMC3 ORA.ATO.125.

- The means of conducting PPL and LAPL theoretical knowledge examinations (Standards Document 11)

- Samples of documentation relating to proposed courses and the training and checking forms detailed in the Training Manual, with evidence of an updating system are to be provided. The person responsible for maintaining and checking records, licences and log books should be named and the frequency of record checks is to be stated. It should be demonstrated that arrangements have been made for the security of records and documents and evidence of standardisation of entries in training records is to be shown.

- Training effectiveness. AMC1 ORA.ATO.230(a)(10).

3.5   Contracted Activities

Where an ATO intends to contract an activity within the scope of its approval to another organisation they can either:

- Contract the activity to an organisation that is itself certified (i.e. under an EASA Implementing Rule) to carry out the activity; or

- If an organisation is not certified to carry out the activity, it must work under the contracting organisations approval i.e. under the approval of the organisation that is certified and which is contracting out the relevant activity.

In either case the approved organisation will need to detail the procedures to support any contracted activities and apply their quality oversight. Further information can be found at ORA.GEN.205, AMC1 ORA.GEN.205 and GM1 ORA.GEN.205.

4.   Progress of an Application

4.1   Allocation of a Licensing Standards Inspector

4.1.1   When a complete application has been received, with relevant application form, fees, manuals and all other associated documentation, a Licensing Standards Inspector will be assigned to oversee the application process and review the relevant documentation. An Approvals Co-ordinator will also be assigned who will be the point of contact for any items submitted in respect of the application; the co-ordinator will record any items submitted and ensure these are tasked to the relevant inspector.

4.2   Incomplete Applications

4.2.1   Where incorrect or incomplete information is supplied, the Approvals Support team shall notify the applicant as soon as reasonably practicable by letter or email detailing the error or omission.

4.3   Review of Manuals, Examinations and Supporting Documentation

4.3.1   Before submitting manuals, organisations should complete the appropriate Manual Checklist at Appendix D & E and submit to the Authority as part of the application.

4.3.2   A manual report will be raised following a review of documentation by the LSI to be forwarded for reference and relevant action to the applicant organisation.

4.3.3   Manuals put forward for initial approval should submitted in paper copy. Once approved an electronic version in a single pfd or word file should be submitted for entry into the LTS electronic document library. All paper copies previously submitted will be destroyed (see Appendix G for further information on submission of manuals).

4.4 Inspection of Facilities

4.4.1 Prior to the initial inspection being carried out, an audit of the entire training organisation shall be performed through the applicant's internal compliance monitoring system to ascertain compliance with all applicable requirements related to the requested scope of the approval. When the internal compliance audit has been completed and all findings and issues addressed, a statement of compliance signed by the Organisation's Accountable Manager shall be provided before the technical inspection takes place. The statement of compliance shall confirm that the documents, procedures, facilities, equipment and personnel comprising the application have been reviewed and audited and that the findings have been properly addressed so that the whole organisation demonstrates full compliance with all applicable requirements.

4.5 Purpose of the Inspection

4.5.1 The purpose of the visit is to meet the post-holders, confirm the suitability of the facilities to be used for training, including any aircraft and FSTDs, and confirm the suitability of the applicant's Management System (incorporating a compliance-monitoring system and safety management system) to ensure continued compliance with the regulations in Part-FCL and Part-ORA.

4.6 Conduct of the Initial Inspection

4.6.1 The allocated LSI will arrange with the applicant a mutually convenient time to visit the location of the proposed ATO. The visit should follow the pattern of a typical audit and include the following:

- An Opening Meeting with the post-holders and the Accountable Manager. This allows the LSI to meet the key management personnel in the proposed ATO, discuss the application, and explain the scope of the visit. The visit schedule will also be explained.

- The audit of the proposed ATO including:

  o A tour of the proposed ATO facilities, including any aircraft and FSTDs.

  o Interviews with post-holders and key management personnel (including Head of Training and Compliance Monitoring Manager) and, if present, the Accountable Manager.

  o Examination of the proposed ATO's detailed management structure, including names and qualifications of personnel (as required by ORA.GEN.210) and the adequacy of the organisation and management structure.

  o Examination of the proposed ATO's documentation as required in Part-ORA, including the Operations Manual and Training Manual (AMC1 ORA.ATO.210).

  o Examination of the proposed ATO's staff qualifications, licenses, certificates and ratings.

  o Examination of the proposed ATO's processes for safety risk management and compliance monitoring, including full documentation of internal audits (ORA.GEN.200 & associated AMC & GM).

- A Closing Meeting, again with the post-holders, and the Accountable Manager, during which the LSI will discuss the audit, including any areas which do not conform to the regulatory requirements. Any required remedial action by the proposed ATO can be discussed with the LSI at this stage.

4.6.2   A suitable private room should be allocated for the LSI to conduct his/her audit, and the required documentation should be prepared in advance and made available to the LSI in this location on commencement of the inspection.

4.7   Post-Inspection

4.7.1   The LSI will record the findings of the Initial Inspection on a standard ATO Approval Recommendation Report form.   A copy of this form will be forwarded to the proposed ATO.

4.8   Follow-Up Actions

4.8.1   Where the outcome of the Initial Inspection is deemed unsatisfactory, and the proposed ATO has been found to be non-compliant with the regulatory requirements in any area, then the ATO Approval Recommendation Report will show the area(s) concerned, the associated Part-ORA reference, the Level of Finding *(*see ARA.GEN.350), and the Corrective Action required by the proposed ATO.   Proposed ATOs will be required to submit a Corrective Action Plan, acceptable to the LSI, to correct any non-compliant areas before the LSI can recommend approval.

4.9   Final ATO Approval

4.9.1   Once the outcome of the Initial Inspection is deemed satisfactory, and the proposed ATO has been found to be fully compliant with the regulatory requirements, then the LSI will recommend that the proposed ATO be approved.   Please note that this recommendation is subject to internal checking and subsequent final approval; further action may still be requested from the proposed ATO at this stage.

4.9.2   Once final approval has been given, the ATO Approval Certificate will be issued by L&TS Approvals Support.

4.10   Approvals Certificate

4.10.1   The ATO should thoroughly check any newly-issued certificate for accuracy. Please note that Approval Certificates issued under EASA will not have an expiry date or contain details of post-holders. However, the approved courses and FSTDs will be listed on the certificate.   Any queries concerning the accuracy of new certificates should be addressed to L&TS Approvals Support as soon as possible.

5   Continued Oversight

Once an ATO has been issued with initial approval it is subject to continued oversight by the competent authority (ARA.GEN.300, ARA.GEN.305 and ARA.ATO.105). This oversight includes audits and inspections, including ramp and unannounced inspections as appropriate, and meetings between the Accountable Manager and the competent authority to ensure both remain informed of significant issues.

5.1   Oversight Planning Cycle

5.1.2   The interval between oversight inspections (oversight planning cycle) is established by the competent authority using risk-based criteria, including change volume and range of activity, ATO size and complexity, and the effectiveness of the ATOs management system.   The oversight planning cycle will not normally exceed 24 months; for new ATOs this timescale runs from the date of initial approval. However, new ATOs may be subjected to a first oversight inspection at a much shorter interval to enable the competent authority to check the effectiveness of the management system (including internal audits) and to observe training taking place. The competent authority is able to extend the oversight planning cycle where it

deems appropriate, but only under the conditions listed in Part-ARA (ARA.GEN.305).

5.2 Continued Oversight Inspections

5.2.1 Continued oversight inspections follow a similar pattern to the initial inspection listed at 4.6. However, the ATO will be expected to have extensive records of all internal audits available, particularly those subsequent to approval, as well as comprehensive student training, staff training and standardisation records. During oversight inspections, significant emphasis will be placed on the effectiveness of the ATO's management system, including internal audits, safety management and compliance monitoring; it is therefore essential that key management system personnel, e.g. Compliance Monitoring Manager, are available during the inspection.

5.3 Desk-Top Audits

5.3.1 At any stage of the oversight planning cycle, and in accordance with ORA.GEN.140 (Access) the allocated LSI may request that copies of internal audits and other records relevant to its activities be forwarded to L&TS. The allocated LSI will then use this data as a basis for a desk-top audit forming part of the continuous oversight of the ATO, including a risk-based assessment of the next due date for inspection of the ATO (see 5.1).

5.4 Test & Examination Success-Rate Monitoring

5.4.1 Following initial approval of an ATO, the CAA will monitor the results of tests and examinations forming part of the approved course. The success-rate of course graduates obtaining first-time passes in the CPL and IR Skill Tests will also be monitored.

5.4.2 An ATO should also monitor the test and examination results of its students. Procedures for such monitoring should be included in the ATO's Training Manual under the heading of 'Training Effectiveness', and include procedures for review and remedial action should the rates drop below a defined level.

5.5 Sampling of Training

5.5.1 The allocated LSI will sample training at various stages of the oversight planning cycle. During inspections, ATO's can expect the LSI to observe actual TK instruction and aircraft or simulated flight training, including pre-flight and post-flight briefings. The LSI will aim not to disrupt or cause distraction during any observation of training. Observation of training may also be carried out by CAA Flight Examiners and Flight Crew Standards Inspectors on behalf of L&TS.

Training records of students and staff, and standardisation records will also be sampled during an ATO inspection, and must be made available to the LSI under ORA.GEN.140.

5.6 Personnel Changes including Key Post Holders

5.6.1 The organisation must at all times ensure that they have sufficient qualified personnel for the planned tasks and activities to be performed in accordance with the applicable requirements. Where there is any change to numbers and availability of staff, this should be discussed with the allocated LSI, to ensure continued approval for training and /or compliance with the regulations.
Part-ORA.GEN.210, Part-ORA.ATO.110

5.7 Key Post Holders
5.7.1 It will be a condition of the approval that whenever an approved post holder (Accountable Manager, HT, CFI or CTKI) leaves an ATO the organisation will

contact the Authority to suspend their approval until the position has been filled or under an alternative arrangement approved by the competent authority.

5.7.2   If a key post holder at an ATO providing modular, type rating or theoretical knowledge training leaves the organisation, an alternative post holder may, on occasion, be able to assume both positions. However, this will only be approved if the existing post holder is qualified to hold the other position. The position of HT, CFI and CTKI may be combined and filled by one or two persons with extensive experience in the training conducted by the ATO, full or part-time, depending on the scope of training offered.

5.7.3   Prior approval of key post holders must be sought from the CAA before appointment in order to enable the competent authority to determine continued compliance.

5.7.4   All nominations for key staff should be made using form SRG2115 for Part-ORA approved organisations. It is recommended these nominations must be made at least 10 days before the date of the proposed change of post-holder (AMC 1 ORA.GEN.130).

5.8   Other Changes to the Organisation

5.8.1   Where the change is in respect of the organisation's scope of the certificate or its terms of approval i.e. additional locations or facilities, the organisation will need to apply formally for such a change on the relevant application form.

5.8.2   For other changes, please refer to Parts ORA.GEN.130 and ARA.GEN310(c) which give details of the mechanism by which the Authority may allow an ATO to make certain changes without prior approval. An associated fee may be charged.

5.8.3   All amendments to approved manuals must be submitted to the Authority for electronic storage or further approval (see Appendix G for further information on submission of manuals).

5.9   Correspondence with the CAA

5.9.1   Following the grant of Initial Approval the CAA's stated method of communication with organisations is by email. It is therefore important that a single email address be provided which is suitable for this purpose and that any changes are promptly sent to L&TS Approvals Support. It will be assumed that the e-mail address provided on the latest application form to the CAA is the current e-mail address to be used.

6.   Revocation, Suspension or Variation / Limitation of an Approval

6.1   Non-Compliance

6.1.1   In cases of any significant non-compliance with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures or manuals, or with the terms of an approval or certificate, which reduces safety or seriously hazards flight safety (refer to ARA.GEN.350(b) and/or ARA.GEN.330(b)) the competent authority will raise a Level 1 finding. Under ARA.GEN.350 (d)(1), and following a Level 1 finding, the CAA can take immediate and appropriate action to prohibit, limit or suspend activities of an organisation it approves under the EASA Aircrew Regulation. 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** reduce safety or hazard flight safety,

as indicated in ARA.GEN.350(c), the competent authority will raise a Level 2 finding.

6.1.2 In accordance with the ANO, a National approval issued by the CAA under the ANO may be revoked, suspended or varied where the requirements cease to be met in part or in whole, or where the standards on which the approval was granted are not maintained. Should there be a failure to meet the requirements or standards, the organisation will be formally notified of the non-conformance(s) and remedial action will be identified and agreed to be taken within a specified time. Should the organisation fail to meet the standards in the specified time, revocation, suspension or variation of the approval will be considered and, if appropriate, the approval will be revoked, suspended or varied.

6.1.3 The organisation has a right of review under Regulation 6 of the Civil Aviation Authority Regulations 1991 in respect of a proposed decision to revoke, suspend or vary a national approval. Whilst there is no formal right to have a decision to revoke, vary or suspend an EASA ATO approval, in practice the CAA will offer the same opportunity to an ATO to have the proposed decision reviewed by a CAA Board member in accordance with its policy and procedure for such reviews, as published in CAP 1048, a copy of which is available at this website: http://www.caa.co.uk/application.aspx?catid=33&pagetype=65&appid=11&mode=detail&id=5616

6.1.4 The CAA may, subject to article 14(1) of the Regulation (EC) 216/2008, provisionally suspend an EASA ATO approval, pending inquiry into or consideration of the case, under article 229(1) ANO. This decision is not subject to a right of review under the Regulation 6 of the Civil Aviation Authority Regulation 1991.

6.2 Fees

6.2.1 It should be noted that continuation fees (fees in respect of continuation of the approval) are payable throughout the full period of ATO suspension.

6.2.2 Where an organisation approval has been revoked, no further fees are payable; however, any outstanding invoices will remain payable.

7 Continuation of Approval

7.1 Approval Certificate

7.1.1 Under EASA Aircrew Regulations or the ANO an approval certificate issued to a training organisation is non-expiring and will remain current provided the privileges and scope of the activities that the organisation is approved to conduct does not change.

7.1.2 For continued oversight of an organisation, the Authority will follow the procedure detailed at Part-ARA.GEN.305

PART 2: Specific Areas of Guidance or Reference

8. Management and Staffing

The management and personnel requirements for ATOs can be found at Part-ORA.GEN.200, Part-ORA.GEN.210, ORA.ATO.110, ORA.ATO.210, AMC1-ORA.ATO.210, and AMC2-ORA.ATO.210

All Key post holders must be nominated to the CAA on form SRG2115 (SRG1180 for Nationally Approved Organisations) and be formally agreed by the CAA before the appointment is made substantive. Current key post holders who do not meet the EASA requirements may continue in post, however, any key post holder who moves to another ATO or new applicants must meet all of the EASA requirements.

8.1 Head of Training

8.1.1 The requirements and qualifications for the Head of Training can be found at Part-ORA.ATO.210(a), and associated AMC & GM material.

8.2 Chief Flight Instructor

8.2.1 The requirements and qualifications for the Chief Flight Instructor can be found at Part-ORA.ATO.210 (b), and associated AMC & GM material.

8.3 Chief Theoretical Knowledge Instructor

8.3.1 The requirements and qualifications for the Chief Theoretical Knowledge Instructor can be found at Part-FCL ORA.ATO.210(c).

8.4 Compliance Monitoring Manager

8.4.1 The requirements and qualification for the Compliance Monitoring Manager can be found at AMC1 ORA.GEN.200(a)(6)(c)(3)(iii).

9. Student: Flight Instructor Ratio

The ratio of all students to flight instructors is stated at AMC1-ORA.ATO.210(e) and should not be more than 6:1 (excluding the HT).

A student shall be included in the ratio calculation from the time at which his flight training commences until the course is completed (except in the case of ATPL (A)/(H) integrated courses where if the course is so arranged that the multi crew co-operation training is conducted on a synthetic training device as the last phase of the course, then the student may cease to be included in the ratio calculation at the conclusion of the preceding phase of the course).

10. Flight Instructors

Sufficient instructors must be employed to ensure the proper continuity of training for all students attending the courses.

10.1 Instructors Course

10.1.1 Under Part-FCL 930(b)(1) the 25 hours of "teaching and learning" for FI, TRI, CRI, IRI, SFI, MCCI and FTI must be part of a course for the grant of an instructor certificate. The previous arrangement of approving stand alone Core Courses, type specific courses or courses for the IRI or CRI without the 25 hours of "teaching and learning" will no longer be allowed. Course instructors must be qualified in accordance with the relevant Part-FCL.

10.2 Flight Instructors general requirements and prerequisite

10.2.1 References for the requirements and prerequisites for Flight Instructors can be found at:

Instructor	Reference
FI certificate requirements	Part-FCL.900
FI prerequisite and general requirements	Part-FCL.915
MPL Instructor additional requirements	Part-FCL.925 AMC1 & GM1 FCL.925
FI specific requirements	Part-FCL.905.FI FCL.910.FL
FI revalidation and renewal	Part-FCL.940
TRI specific requirements	Part-FCL.905.TRI; FCL.910.TRI
TRI revalidation and renewal	Part-FCL.940.TRI
CRI specific requirements	Part-FCL.905.CRI
CRI revalidation and renewal	Part-FCL.940.CRI
IRI specific requirements	Part-FCL.905.IRI
IRI revalidation and renewal	Part-FCL.940.IRI
SFI specific requirements	Part-FCL.905.SFI; FCL.910.SFI; FCL.915.FSI
SFI revalidation and renewal	Part-FCL.940.SFI
MCCI specific requirements	Part-FCL.905.MCCI
MCCI revalidation and renewal	Part-FCL.940.MCCI
STI specific requirements	Part-FCL.905.STI; FCL.910.STI
STI revalidation and renewal	Part-FCL.940.STI
MI specific requirements	Part.FCL.905.MI
MI validity	Part-FCL.940.MI
FTI specific requirements	Part-FTI.905FTI
FTI revalidation and renewal	Part-FCL.940FTI

10.3 Instructor – Restricted Privileges

10.3.1 For the circumstances where the privileges of an instructor to conduct flight instruction are limited to conducting flight instruction under supervision, and the requirements for the supervising FI, refer to FCL.910.FI.

10.4 Flight Instructors holding Non EASA Qualifications

10.4.1 ATO's approved to conduct training outside a Member State may employ flight instructors holding a national licence in accordance with Part-FCL.900(c).

10.4.2 The training of non EASA instructors may be conducted within an ATO provided the ATO holds an FIC approval, by an EASA qualified FI within the privileges to conduct FI Courses. On completion of the training the candidate shall pass an assessment of competence with either a FIE or a CAA Staff Examiner.

11. Theoretical Knowledge Instructors

Refer to ORA.ATO.210(c) for the requirements for CTKI and for Theoretical Knowledge Instructors refer to AMC1 ORA.ATO.210(g)(h) and AMC1 ORA.ATO.110(c).

For details of class size, refer to AMC1 ORA.ATO.210 (f).

Sufficient Theoretical Knowledge Instructors must be employed to ensure the proper continuity of theoretical knowledge instruction for all students attending the courses.

12.   Training Standards

The CFI shall be responsible for the supervision of flight and flight simulator training instructors and for their standardisation. The Operations Manual shall describe the process and procedure to be used to achieve these requirements.   See ORA.ATO.230.

13.   Flight Time Limitations

The ATO Operations Manual shall detail flying duty periods and flight time limitations for instructors.   These requirements are to be compliant with limits imposed by the UK Air Navigation Order, as appropriate, and should be acceptable to the Authority. See also AMC1 ORA.ATO.230(b) Training Manual and Operations Manual.

Instructor's logbooks are to include a monthly summary of all flying, separating approved course instruction from other flying.

14.   Records

Proportionate to the size and scope of the operation, administrative staff should be provided to accomplish the routine administration of courses.

Refer to ORA.GEN.220 and AMC1 ORA.GEN.220(b) for details of record keeping.

The HT or the nominated person shall be responsible for ensuring that adequate records acceptable to the CAA are maintained in respect of the flight, theoretical knowledge and synthetic flight training undertaken.

14.1   Content of Records

14.1.1   The form and content of student training records is to be specified in the Training Manual and be acceptable to the CAA and appropriate to the courses conducted.

14.1.2   The records are to include:

- The personal details of each student, including name, address, telephone contact number(s), CAA reference number, next of kin details, previous experience and evidence of all pre-entry requirements (for example copies of licence/rating pages, theoretical knowledge exams passed, course completion certificates, copies of Skill Test form, medical certificates), and qualifications including a summary of any credit to which the student may be entitled and an assessment of his/her suitability to undertake the course;

- A cumulative record of theoretical knowledge lessons attended by subject;

- Regular reports by subject with the instructor's name and written comments by the instructor on the student's performance and progress and other factors such as attitude and manner during individual lessons and during the course as a whole. Students should be invited to sign each report acknowledging its contents;

- Cumulative flying training achieved, and where applicable synthetic flight training achieved;

- For each training flight or synthetic flight training detail, the date, the aircraft registration or FSTD identification, the flight time, the instructor's name in full, the syllabus exercise number and written comments by the instructor on the students performance, progress and other factors such as attitude and manner during the detail and during the course as a whole. The record shall indicate the standard achieved in relation to the laid down performance

standard and any deviations from the syllabus including incomplete items. Students are required to sign each report acknowledging the debrief;

- A summary of flying exercises completed with the date on which each exercise was carried out in the air or in a FSTD ;

- Relating to the student's progress, summary reports and the result of progress/phase tests, skill tests and theoretical knowledge examinations including arrangements for remedial training after failed tests/examinations;

- Training in aircraft emergency procedures, to be recorded separately and displayed prominently.

- All records shall indicate the date training commenced and the date of completion. Where students do not complete the course the record shall indicate the circumstances under which training ceased. The students overall performance and attitude to training should be summarised on completion or termination of the course.

- It is advisable that for all integrated courses, or any course requiring solo flying, a medical certificate is obtained before the commencement of training.

- Training records are to be made available to examiners prior to test in accordance with Part-FCL.030(b).

14.1.3 For record-keeping system see AMC1 ORA.GEN.220(b) and AMC1 ORA.ATO.120(a);(b).

14.1.4 All records should be kept for a minimum period of 3 years. Refer ORA.ATO.120.

15. Course Completion Certificates

On satisfactory completion of a course of instruction, the trainee is to be given a Certificate of Course Completion (Appendix B) signed by the HT, CTKI, or nominated deputy. An example of the certificate is to be included in the Training Manual. Persons within an ATO who are authorized by the ATO to sign Course Completion Certificates should be named in the Operations Manual. The ATO should also document in the Operations Manual the method, including any questions, experience or training deemed necessary, it will use in order to authorize persons to carry out this task.

16. Transfer of Student Records

Appendix 3 to Part-FCL states the requirements for different types of training courses for the issue of CPL and ATPL and the transfer of training between ATO's. It is the responsibility of the student to request the transfer of a copy of their records between ATO's.

The CAA will accept an applicant transferring from one ATO to another when partway through a course in accordance with the following:

- The new ATO must have a copy of all relevant training records, or other acceptable information certifying the training and experience completed so far.

- Credit shall be given in full for all adequately documented solo, dual instruction or Pilot in Command (PIC) flight time completed as part of an approved course for the licence, rating or certificate.

- The HT of the new ATO shall assess the student and determine the balance of training and experience required to complete the course and any additional

training necessary to cover the transition from the previous partly completed course. The HT will then make a recommendation to CAA Licensing & Training Standards and obtain confirmation of agreement.

- The applicant shall complete the balance of all training, examinations, flight time and shall complete any additional training necessary as specified in the determination by the HT of the new ATO that has been agreed with the CAA.

Note: Under the Data Protection Act it is the student's responsibility to request the transfer of a copy of their records to the new ATO. The copies must be certified as correct by the originating ATO and should be forwarded directly to the HT of the new ATO, with notification being sent to the CAA Approvals Support.

17   Personal Flying Log

17.1   Content and Certification

17.1.1   Student and instructor pilot logbooks must be kept in accordance with the provisions of Article 79 of the United Kingdom Air Navigation Order and FCL.050 and AMC1 FCL.050, as appropriate. All approved course flying and synthetic flight training is to be clearly identified as such and include details of the exercises carried out.

17.1.2   In addition to the legal requirement student logbooks are to include details of the exercise number using the approved syllabus designator. Qualifying cross-country flights should be entered as individual flights showing the points of departure and arrival. Stall and spin awareness training, instrument training and asymmetric training shall be recorded in the remarks column.

17.1.3   Students' logbooks are to be certified as being correct at the end of each course by the HT or nominated deputy.

17.2   Instructors Logbook

17.2.1   The logbooks of instructors who conduct flight instruction on an approved course, including non-JAA instructors, must be maintained in accordance with Article 79 of the Air Navigation Order, and include a monthly summary of all flight time which clearly distinguishes approved course instructional flying from other flying.

18.   Training Programme(s)

A separate training programme/syllabus is required to be submitted and approved for each proposed course and for each variation of a specific course e.g. SE CPL and ME CPL courses.

AMC1 ORA.AT0.125

18.1   Criteria and Detail for Training Manual:

18.1.1   AMC1-ORA.ATO.230(a)

18.2   Criteria and Detail for Operations Manual (excepting Flight Test Organisations):

18.2.1   AMC1-ORA.ATO.230(b)

18.3   Training Programme(s) continued:

18.3.1   The References Table at 18.4 is to assist with specific courses and is correct at time of publication, but cannot be assumed to be correct where the EASA Aircrew

Regulation has changed. The references do <u>not</u> include revalidation / renewal requirements or guidance.

18.4   Summary Table of References

18.4.1   LAPL

LAPL (General)	Aeroplanes	Helicopters	Sailplanes	Balloons
FCL.100				
FCL.105	FCl.105.A	FCL.105.H	FCL.105.S	FCL.105.B
FCL.110	FCL.110.A	FCL.110H	FCL.110.S	FCL.110.B
FCL.115				
FCL.120				
FCL.125				
			FCL.130.S	FCL.130.B
	FCL.135.A	FCL.135.H	FCL.135.S	FCL.135.B
	FCL.140.A	FCL.140.H	FCL.140.S	FCL.140.B

18.4.2   PPL

PPL (General)	Aeroplanes	Helicopters	Airships	Sailplanes	Balloons
FCL.200					
FCL.205	FCL.205.A	FCL.205.H	FCL.205.As	FCL.205.S	FCL.205.B
FCL.210	FCL.210.A	FCL.210.H	FCL.2190.As	FCL.205.S	FCL.210.B
FCL.215					
				FCL.220.S	FCL.220.B
					FCL.225.B
				FCL.230.S	FCL.230.B
FCL.235					

18.4.3 CPL

CPL (General)	Aeroplanes
FCL.300	
FCL.310	
FCL.315	
FCL.320	
	FCL.325.A

18.4.4 MPL

MPL (A)
FCL.400.A
FCL.405.A
FCL.410.A
FCL.415.A

18.4.5 ATPL

ATPL (General)	Aeroplanes	Helicopters
FCL.500		
FCL.505	**FCL.505.A**	
	FCL.510.A	**FCL.510.H**
FCL.515		
	FCL.520.A	**FCL.520.H**

18.4.6 IR

IR (General)	Aeroplanes	Helicopters	Airships
FCL.600			
FCL.605			
FCL.610			
FCL.615			
FCL.620			
FCL.625	**FCL.625.A**	**FCL.625.H**	**FCL.625.As**
		FCL.630.H	

18.4.7 Class and Type Ratings

Class and Type Ratings (General)	Aeroplanes	Helicopters	Powered Lift Aircraft	Airships
FCL.700				
FCL.705				
FCL.710				
	FCL.720.A	FCL.720.H	FCL.720.PL	FCL.720.As
FCL.725	FCL.725.A		FCL.725.PL	
	FCL.730.A			
	FCL.735.A	FCL.735.H		FCL.735.As
FCL.740	FCL.740.A	FCL.740.H	FCL.740.PL	FCL.740.As

18.4.8 Additional Ratings

Aerobatics	Sailplane Towing and Banner Towing	Night	Mountain	Flight Test
FCL.800	FCL.805	FCL.810	FCL.815	FCL.820

18.4.9 Instructors

Instructor Certificate (General)
FCL.900
FCL.915
FCL.920
FCL.925
FCL.930
FCL.935
FCL.940

FI	TRI	CRI	IRI	SFI
FCL.905.FI	**FCL.905.TRI**	**FCL.905.CRI**	**FCL.905.IRI**	**FCL.905.SFI**
FCL.910.FI	**FCL910.TRI**			**FCL.910.SFI**
FCL.915.FI	**FCL.915.TRI**	**FCL.915.CRI**	**FCL.915.IRI**	**FCL.915.SFI**
FCL.930.FI	**FCL.930.TRI**	**FCL.930.TRI**	**FCL.930.IRI**	**FCL.930.SFI**
	FCL.935.TRI			
FCL.940.FI	**FCL.940.TRI**	**FCL.940.TRI**	**FCL.940.IRI**	**FCL.940.SFI**

MCCI	STI	MI	FTI
FCL.905.MCCI	**FCL.905.STI**	**FCL.905.MI**	**FCL.905.FTI**
FCL.910.MCCI	**FCL.910.STI**		
FCL.915.MCCI	**FCL.915.STI**	**FCL.915.MI**	**FCL.915.FTI**
FCL.930.MCCI	**FCL.930.STI**	**FCL.930.MI**	**FCL.930.FTI**
FCL.940.MCCI	**FCL.940.STI**	**FCL.940.MI**	**FCL.940.FTI**

19.   Flight and Synthetic Flight Training

19.1   Skill Test

19.1.1   An applicant for any skill test shall be recommended for the test by the organisation or person responsible for the training, once the training is complete. FCL.1005(a)(2) states that the person may not conduct the test if they have made the recommendation for the student to take the skill test in accordance with FCL.030. Each applicant for the skill test is required to provide written evidence to the examiner that they have been recommended for the test in accordance with FCL.030 using the approved company procedure at their ATO. This approval must be signed by the person making the recommendation, with the name and the date of the authorising signatory.

19.2   Credits

19.2.1   Where credits are claimed against the approved course hours, by virtue of meeting the issue requirements for a licence or rating specified in Part-FCL, the applicant shall not be entitled to the credit unless they meet all of the requirements for the issue of that licence or rating prior to course commencement.

19.3   Flight Instruction on a IRI (H) Course

19.3.1   Although some flight instruction on the IRI(H) course may be conducted on a suitably qualified and approved FSTD, the Skill Test for the IRI(H) will invariably be conducted on a multi-engine helicopter certified for flight under IFR. Sufficient instruction (an approved IRI course should comprise of at least 10 hours of flight instruction, of which a maximum of 8 hours may be in a FSTD) must be given on

the helicopter type to be used for the test to ensure that the candidate has adequate familiarity with it.

20. Theoretical Knowledge Instruction

20.1 Syllabus

20.1.1 A detailed table containing the theoretical knowledge syllabus for ATPL, CPL and IR for aeroplane and helicopter can be found at Part-FCL Subpart D - G, AMC FCL.310, FCL.515(b), FCL.615(b) and for PPL(A) & (H) at AMC1 FCL.210; FCL.215 .

20.2 Reference Library and Demonstration Equipment

20.2.1 A reference library (which may be either electronic or hard copy) containing publications giving coverage of the syllabus shall be immediately available to staff and students when in attendance at the ATO and, where applicable, kept current by amendments. AMC1 ORA.ORA.GEN.215 Facility requirements.

20.2.2 Suitable demonstration equipment to support the theoretical knowledge instruction shall be provided.

20.3 Student Notes and Learning Objectives

20.3.1 Student study notes should be prepared specifically to meet the needs of the student pilot. Definitions and abbreviations used should conform to those used by the European Aviation Safety Agency.

20.3.2 Learning objectives for the theoretical knowledge syllabuses are published by the JAA to assist ATOs prepare courses for approval and may be found on the JAA website at http://www.jaa.nl/licensing/jar-fcl.html

20.4 Computer Based Training

20.4.1 Computer Based Training (CBT) may form a part of the Theoretical Knowledge instruction; however, CBT must not exceed 33% of the total Theoretical Knowledge course length without special justification and approval from the CAA for integrated pilot licence courses. Distance learning (study by correspondence) will **not** be approved as part of an integrated course of training.

20.5 Examinations

20.5.1 Students will be required to sit professional pilot examinations for ATPL, CPL and IR at Examination Centre's notified for the purpose by the CAA. Refer to Aeronautical Information Circular (AIC) and/or the CAA website for details and dates.

20.5.2 Students sitting theoretical knowledge examination for the issue of an aeroplane class or type rating must satisfy the requirements of Part-FCL Subpart H, Section 2, FCL.725.A and AMC1 FCL.725(a). Students sitting theoretical knowledge instruction and examination for the issue of a helicopter class or type rating must satisfy the requirements of Subpart H FCL.720.H.

20.6 Class and Type Rating Examinations

20.6.1 The theoretical knowledge syllabus to be followed for a SE and ME aeroplanes and helicopters class or type rating can be found at AMC1 FCL.725(a). The number and type of questions required for different class and type ratings can be found at FCL.725.

20.6.2 In accordance with FCL.725(b)(4), a written examination based on the syllabus in the AMC1 FCL.720A(b)(2)(i) is required to qualify for the grant of a single pilot high performance aeroplane class or type rating or meet the requirements stated at FCL.720A(b) for non-complex aeroplanes or FCL.720A(c) for complex aeroplanes.

20.6.3 ATOs are responsible for the preparation and conduct of the examinations required by FCL.725(b). The Training Manual is to include the arrangements for conducting the examinations and maintaining the confidentiality of examination papers; the procedure for examination paper preparation including types of question to be asked and notification of results; the procedure for question analysis and review and the raising of replacement papers and re-sit procedures. Copies of examination papers are to be approved and deposited with the CAA.

20.7 Training Programme

20.7.1 The integration of theoretical knowledge instruction with the flying and synthetic flight training must be acceptable to the CAA.

20.7.2 Separate training programmes shall be prepared for students entitled to credits in theoretical knowledge in accordance with Part-FCL.035.

20.7.3 Satisfactory completion of theoretical knowledge instruction must be recorded.

21. Provision of MEP Class and Type Rating Theoretical Knowledge Exams

Where an integrated course results in the candidate taking a licence skill test on an aircraft type or class that requires a specific written examination, the ATO shall set and administer the examination for that Class or Type rating. Details of the examination shall be provided in the relevant Training Manual. The CAA shall approve examination papers, and a minimum of 2 papers are required per aircraft type or class rating.

21.1 General

21.1.1 Theoretical knowledge instruction requirements, including examination requirements are contained in AMC FCL.725(a) for aeroplanes and helicopters. The following paragraphs provide more detailed information concerning both the design of theoretical knowledge question papers and the framing of questions.

21.2 Format of Examination Papers

21.2.1 Each examination paper should comprise:

- The question paper.
- A separate answer sheet.
- Cover Sheet. The cover sheet should state the following information:
    - The examination to which it relates
    - The time allowed
    - The number of questions
    - The pass mark
    - Detailed instructions to candidates concerning:
    - Papers and any reference material permitted during the examination
    - How the answer paper should be completed
    - How to indicate a change of answer
- Completion of papers and surrender of all paperwork to the invigilator on completion of the examination

21.3   Question Paper.

21.3.1   The number of questions appropriate to the aircraft type and complexity, as detailed above, should be arranged into the main subject areas. Each question should be provided with four alternative answers.

21.4   Answer Sheet.

21.4.1   The answer sheet should contain the following:

- Identification of the examination paper to which it relates

- The candidate's name and reference number

- The date of the examination

- A method of recording the candidate's answer to each question

- The mark obtained by the candidate (In each Subject if appropriate)

- The name and signature of the invigilator

21.5   Framing of Questions

21.5.1   When preparing theoretical knowledge examinations for Part-FCL type ratings, the examiner should keep in mind that the examination candidate may not have English as a first language. It is, therefore, important that each question is clearly framed, uses correct English grammar and syntax, and is completely unambiguous.

21.5.2   Use of the second person should be avoided, for example "What action would you take if……" is unsatisfactory and should be framed as "What is the correct action to take if…."

21.5.3   All questions must consist of a question stem followed by four optional answers. One answer is to be completely correct. If possible and appropriate, it should also be in the same verbatim form as to be found in a relevant technical text.   The remaining answers should appear logical and plausible as far as possible, but must require a thorough knowledge of the subject matter to be discarded as wrong.

21.5.4   The following basic rules should be observed:

- Properly structured and correct English must be used throughout the questions and options. When a statement poses a direct question it should end with a question mark.

- Where the question is framed as a partial statement to be completed by one of the optional answers, the stem should terminate in a semi-colon.

- All four optional answers, when read in conjunction with the question stem, must follow on logically and be grammatically correct.

- The construction of more complex questions should identify the subject, set the scene or conditions or describe the technical situation, prior to the final crucial part of the question.

- When setting questions requiring the use of data tables needing interpolation or graphs with fine scales to calculate the correct answer, ensure that the correct answer is well separated from any of the other answers. Other plausible, but incorrect, answers can be derived, for example, by using an incorrect graph or table which does not match the parameters of the question. Alternatively, following an incorrect sequence, such as diagonals instead of verticals, to obtain dubious results in certain performance graphs would produce a 'credible' answer. Also consider omitting to incorporate some relevant correction factor to derive a false alternative answer.

- Units should always be included in optional answers, where appropriate. They are often a critical element of the correct answer.

- Subject matter that has previously been examined in licensing examinations or that applies to multiple aircraft types should not be included in type rating theoretical knowledge examinations. In particular, questions in Sections 3 and 4 of the examination should, wherever possible, relate to loading and performance calculations using data specific to the relevant aircraft type.

21.5.4   The following must be avoided:

- Answer options that cannot be grammatically and logically linked to the question.

- Questions where more than one answer is completely correct.

- Options such as 'All of the above' or 'None of the above' or example a & c are correct

- Question/Options structure that allows elimination of possible answers on purely logical or numerical grounds, requiring no technical knowledge.

- Abrupt question stems, sometimes of only three words followed by a question mark are unacceptable.

- Mixing the format of optional answers.

- Non-challenging questions, such as 'Q. How many blades on the main rotor?' Answers: a) 1, b) 2, c) 3, d) 4.

- Two of the optional answers being effectively the same.

22   MCC Training

The requirements of a MCC training course can be found at Part-FCL.735.A, Part-FCL.735.H, Part-FCL.720.PL, Part-FCL.735.As, AMC1 FCL.735.A, FCL.735.H, and FCL.735.As.

FCL.720.A, FCL.720.H, FCL.720.PL and FCL.720.As state that a certificate of satisfactory completion of a course of Multi-Crew Co-operation training must have been completed by an applicant prior to the issue of a first Multi-Pilot Type Rating. MCC training may be conducted as part of an integrated course such as ATPL integrated or MPL integrated courses, or combined with type rating training or as a standalone module where neither of the aforementioned is possible. Wherever possible, MCC training should be combined with the initial type rating training for maximum benefit to the student.

Graduates of an integrated ATPL or MPL course will have completed MCC training as part of that course.   PPL/IR or CPL/IR holders who have not graduated from an integrated course and who wish to add a first multi-pilot aircraft type rating to their licence will need to undertake such training.

22.1   MCC Instructors

22.1.1   Practical instruction in multi-crew co-operation, when combined with type rating training, shall be given by appropriately qualified Type Rating Instructors or Synthetic Flight Instructors.

22.1.2   In the case of modular MCC courses, or courses conducted as part of an integrated ATPL course, practical instruction shall be given by suitably qualified MCC instructors or TRIs who meet the requirements of FCL.905.TRI.

22.1.3 Additional privileges and condition of an MCCI can be found at FCL.900, FCL.905.FI(j), FCL.905.TRI, FCL.905.SFI, FCL.905.MCCI, FCL.910.MCCI, FCL.915.MCCI, FCL.930.MCCI and FCL.940.MCCI.

22.1.4 MCCI instruction may be carried out under the supervision of a TRI, SFI, or MCCI nominated by the ATO and listed in the Operations Manual.

22.2 MCC Theoretical Knowledge

22.2.1 The MCC theoretical knowledge course must comply with the requirements of AMC1 FCL.735.A and AMC1 FCL.735.H and is to be included in the Training Manual. The main emphasis of the theoretical knowledge training should be on the practicalities of working as part of a team and should provide a sound footing on which subsequent CRM training may be built. Technically orientated material, and that covering the specific operation of the aircraft type must be kept to an absolute minimum, particularly on modular courses.

22.2.2 Reference material for the trainee shall be produced. This material should cover the minimal technical and performance knowledge requirements and standard operating procedures needed to successfully operate the FSTD and accomplish the required exercises.

22.3 MCC Practical Training

22.3.1 For a list of training devices to be used for MCC practical training refer to FCL.735.A(2) for aeroplanes and FCL.735.H(2)(b) for helicopters.

22.3.2 Practical training sessions are to be of suitable length to meet the objectives of the course, but no more than a 4 hour session in the FSTD used for the training. Each session should comprise of 2 hours pilot flying (PF) and 2 hours pilot not flying (PNF), and should be completed during a single working day. Appropriate provision for pre session briefing and post session de-briefing is to be included in the training programme.

22.3.3 Where MCC training is combined with initial type rating training the practical MCC training may be reduced to no less than 10 hours if the same FFS is used for both the MCC and type rating training. The 10 hours of MCC training must be identified within the type rating flight training. For students attending a MCC standalone course, the practical training must be 20 hours, or 15 hours in the case of students attending an ATPL integrated course.

23 Training Aircraft

The EASA requirement for training aircraft is detailed at AMC1 ORA.ATO.135. Specifically they must have duplicated primary flight controls (swing-over controls are not acceptable). The HT is responsible for ensuring the fleet of aircraft is suitable for the scope of training being conducted.

In determining fleet size the ATO must ensure that a sufficient number of aircraft, suitably equipped and appropriate to the course on offer, are provided to achieve continuity of flying training for the number of students attending the courses. The requirements for routine maintenance and use of aircraft for other purposes must be taken into account when determining fleet size.

Part-ORA.GEN.130(c), AMC1-ORA.ATO.135, and ANO, article 28(6) and (7), 37(2) and 39(2) and Schedules 4 and 5.

23.1 Internal Procedure for Approval of Aircraft

23.1.1 The Operations Manual should include the means by which the training impact of any deficiency is monitored and managed. A procedure listing the checks carried out by the HT or Nominated Deputies to qualify an aircraft is to be published in the Operations Manual. Changes to the training fleet no longer need to have CAA approval, however, any additions to or removals from the fleet should be reflected in the Operations Manual and the CAA notified in accordance with the approved procedure.

23.2 Documents and Manuals

23.2.2 Aircraft must be maintained in accordance with the appropriate maintenance schedule and the following documentation must be available for inspection by the CAA Inspectors:

- Aircraft, engine and component log books as appropriate

- Certificates of Airworthiness and Registration

- Mass and Balance Schedules

- Certificates of Maintenance Review (except where exempt) and Release to Service

- Aircraft Radio Licences and Radio Installation Approvals

- Flight Manuals or Pilot's Operating Handbooks.

- Certificates of Insurance

- Checklists

- Noise Certificate (if required)

23.2.3 In addition to the items listed above, the record of hours and days remaining to the next maintenance check and the record of rectification or deferring of previously reported defects must be readily available for scrutiny by pilots before each flight.

23.2.4 Each aircraft must be fitted with duplicated primary flying controls, for use by the instructor and the student. Robinson helicopter cyclic controls are not considered swing-over controls for this purpose.

23.2.5 ATOs conducting training for the FI(A) rating shall have available an aeroplane suitable for developed spinning.

Criteria for Aircraft

23.3.1 Flight, primary engine and associated ancillary instruments, as required by the ANO must be fitted and appropriate airworthiness requirements must be met. These instruments must be readily visible to both the instructor and the student when sitting normally in their customary seats with seat belts and diagonal shoulder straps or safety harness fastened.

23.3.2 Trim controls, ancillary engine controls, fuel controls, steering, brakes, wheel brakes, and undercarriage controls where appropriate and the cabin fire extinguisher must be either duplicated or positioned so that they are accessible to both the instructor and student when sitting normally in their customary seats with seat belts and diagonal shoulder strap or safety harness fastened. Single engine aeroplanes with fuel controls fitted on the left hand side (not accessible by the instructor) may be acceptable.

23.3.3 Each aircraft must be equipped with a VHF Transceiver with at least 760 channels, controllable from both the student and instructor stations. A two-way intercom must

be fitted which permits both pilots to monitor radio communication made by either pilot.   All in-flight communications must be carried out using headsets.

23.3.4   In addition to meeting the provisions of the appropriate airworthiness requirements, each aircraft must be equipped in accordance with ANO Schedules 4 and 5.

23.3.5   Hand-held Fire Extinguishers should be carried in accordance with the Air Navigation Order 2009 as amended.

23.3.6   A sample of aircraft will be inspected for condition and compliance with the regulations prior to initial approval and periodically in respect of continuation of approval. Where an aircraft or its associated documentation is found to be non-compliant, the aircraft should be removed from training until such items are rectified.

23.3.7   Furthermore, all nominated aircraft must meet the relevant airworthiness requirements for remunerated training and testing laid down under Part 3 of the ANO 2009 as amended unless the application for registration specifically states that no remunerated training or testing will be carried out. If remunerated training or testing is to be carried out, aircraft must (unless covered by exemptions relating to individually or group owned aircraft):

- o   Have a valid EASA Certificate of Airworthiness and Airworthiness Review Certificate if an EASA aircraft, and meet airworthiness requirements regarding 'life' items; or

- o   Have a valid UK Certificate of Airworthiness and a Certificate of Maintenance Review in accordance with Article 26 of the ANO 2009 as amended if a non-EASA aircraft.

23.3.7   Aircraft operator (third party liability) insurance must be compliant with EC Regulation [EC] No 785/2004 - Insurance Requirements for Air Carriers and Aircraft Operators; as detailed in AIC 46/2005 (Yellow 170) dated 26 May 2005. Cover must also include CAA staff when they are carrying out inspections or testing on the aircraft.

23.3.8   Where an aircraft is operated by an ATO which is not the owner of the aircraft, a letter of operational transfer or lease agreement should be in place to support the validity of the insurance.

23.4   Technical Logs and Authorisation of Flights

23.4.1   For all training flights, Aircraft Technical Logs or an approved Authorisation Sheet must be used to record flight details. The Technical Log ⁄ Authorisation Sheet must include at least:

- The date

- The aircraft registration

- The times when the aircraft took-off and landed

- Particulars of any defect known to the commander that might affect the airworthiness or safe operation of the aircraft, or if no such defect is known an entry to that effect

- Fuel and oil states

- Intended duration of flight

23.4.2   The Technical Log or Authorisation Sheet should be left at the initial point of departure.

23.4.3   Flight authorisation for all training flights shall be confined to instructors employed by the ATO to give instruction on the approved courses.

23.4.4 Where an aircraft is hired for use on an approved course of training, or where an aircraft used for approved training ceases to be used by the ATO, a copy of all Technical Logs relating to the approved training shall be retained by the ATO for a period of 5 years. All Technical Logs shall be maintained in accordance with the ANO 2009 as amended.

23.5 Changes to the fleet

23.5.1 Changes to the fleet of training aircraft shall be notified to the Authority by the ATO using the procedure approved for the purpose in accordance with ORA.GEN.130(c).

24. Flight Simulation Training Devices

ORA.ATO.135 and ORA.FSTD

24.1 Device qualification and User Approval

24.1.1 All Flight Simulation Training Devices (FSTD) when substituting for an aircraft, are to be "qualified" and "approved" for use.

24.1.2 The basic distinction between "Device Qualification" and "User Approval" is that Qualification is a measure of the device's capabilities against a set of technical specifications whereas the "User Approval" relates to the extent to which a device may be used, in lieu of the aircraft for licensing and/or operational training, testing or checking. This also takes into account where appropriate, the aircraft to device differences and the operating and training ability of the ATO. The "User Approval" effectively links the use of a "qualified device" to a particular course of training by giving credits against "flight time" or more specifically allowing a given device to be used, in lieu of the aircraft, to satisfy various licensing and operational requirements i.e. skill test or proficiency check.

24.1.3 Organisations should refer to Part-ARA.FSTD.110 for more information relating to the issue of a FSTD Qualification certificate.

24.1.4 For additional information relating to the qualification of Flight Navigation Procedure Trainers (FNPTs) and Basic Instrument Training Devices (BITDs) refer to Standards Document 18.

24.1.5 The mechanism and format of the User Approval is changing. This has been brought about by the changes to the regulatory requirement documents themselves. Previously JAR-FSTD H & EU-OPS (but not JAR-OPS 3) specifically stated the requirement for a User Approval. Neither Part-FCL, Part-ARA, Part-ORA nor Part-ORO contain any reference to a User Approval.

24.1.6 The CAA understands that it is EASA's intention (ORA.FSTD.100) that Licensing 'credits' should be shown on the ATO Certificate and Operations 'credits' shown in Part D of the Aircraft Operator's training manual. The training manual would also include details of how any differences between FSTD and the User's aircraft are addressed.

24.1.7 Part-ORO is not being implemented by the CAA until October 2014 and therefore EU-OPS remains applicable for fixed wing aircraft Operators until then.

24.1.8 As EU-OPS is not pertinent to helicopter operators, the CAA published a letter in late 2012 to all Helicopter FSTD Users to encourage them to migrate to the 'new' standard (described in 24.1.6 above).

24.1.9 For fixed wing FSTD users, a User Approval is still needed unless only type conversion is being sought. Course(s) such as the aircraft type conversion, including Zero Flight Time Training approval (if applicable), and the aircraft type variant differences are now shown on the ATO certificate. However, the

continuation (recurrent) licensing credits and the Operations credits, where applicable, are only shown in the User Approval.

24.1.10 The CAA anticipates that fixed wing FSTD users will need to 'migrate' to the 'new' standard by October 2014 at the latest.

24.1.11 In summary, a FSTD qualification certificate will be issued by the CAA (FSTD Standards) where a device satisfies the mandatory regulatory requirements. The ATO approval certificate will be annotated to reflect which device(s) are acceptable for which course(s). It is therefore essential that Organisations keep the CAA informed, giving as much notice as possible, where new devices are proposed for use to ensure that approved training can be conducted without interruption to the associated training course. A User Approval is required for a fixed wing 'user' who seeks to use a FSTD for continuation (recurrent) licensing credits and / or Operations credits.

24.2 Training Syllabus

24.2.1 The syllabi contained in the ATO's Training Manual(s) should identify the device and reflect the number of hour's credit for each device and each course. These will be reviewed and agreed by the Authority; any changes need to be notified. Any changes should be submitted to the Authority for approval prior to implementation

25. Aerodromes and Operating Sites

25.1.1 AMC1 ORA.ATO.140

25.1 Unlicensed Aerodromes

25.1.1 In accordance with Article 208A of the ANO as amended, flying training may be conducted by an ATO from unlicensed aerodromes using fixed wing aircraft up to 2730 kg MTOW, and helicopters or gyroplanes up to 3175 kg MTOW, provided that the HT, aerodrome operator and the pilot in command of the aircraft are satisfied on reasonable grounds that the aerodrome is suitable for the purpose, ATC is not required as part of the course and should meet the requirements of CAP 793. Use of an unlicensed aerodrome as an ATO's base aerodrome or alternative base aerodrome is subject to the approval of the Authority.

25.1.2 CAP 793, Safe Operating Practices at Unlicensed Aerodromes, includes guidance on how to assess whether an aerodrome is suitable for training; where flying training is taking place additional safety margins should be considered. It is recommended that adequate risk assessments are made and documented before flying training takes place. A Safety Management System (SMS) provides a framework for the identification and management of risk, and is required for ATO approval by the implementation date.

25.1.3 Refer to AMC1 ORA.ATO.140 for the specific requirements of a base aerodrome, and any alternative base aerodrome.

25.2 Air Traffic Control during Flight Training

25.2.1 A minimum of an Air/Ground Communication Service must be provided at the aerodrome and alternative aerodrome(s) whilst flying training is in progress.

25.3 Use of Non-Approved Aerodromes

25.3.1 Flight training by an ATO as part of an approved course must take place from either the approved base aerodrome or any approved alternative base aerodrome. However, such flights may land at a non-approved aerodrome during the course of training provided that that aerodrome meets the requirements of the ANO article 211 and either CAP 168 (Licensing of Aerodromes) or CAP 793 (Safe Operating Practices at Unlicensed Aerodromes). Subsequent training exercises may then commence from that non-approved aerodrome provided that the intention is to land

back at either the approved base aerodrome or an approved alternative base aerodrome. Pre-flight briefings must, however, have been carried out at either the approved base aerodrome or an approved alternative base aerodrome.

25.3.2 Approved training courses may not commence or finish at non-approved aerodromes.

25.4 Use of Overseas Aerodromes

25.4.1 Use of an overseas aerodrome as an ATO's base aerodrome or alternative base aerodrome will not be approved by the Authority unless it can be demonstrated that the aerodrome can at least meet the requirements of CAP 168 (for aerodromes licensed by the relevant state's National Aviation Authority) or CAP 793 (for unlicensed aerodromes). Use of unlicensed overseas aerodromes for flying training on approved courses is subject to the restrictions at Para 25.1. The use of unlicensed aerodromes will be considered by the CAA upon receipt of an application.

25.4.2 Applications submitted in relation to a location outside of the UK must be accompanied by a letter from the NAA of the State concerned to the ATO agreeing to the proposed scope of operation at the base in question. It should be noted that where alternative bases are located in another EASA member state the NAA of the state may play a part in the oversight of the activity at that base.

26. Facilities for Flight Operations and Theoretical Knowledge Instruction

Facility requirements for ATOs providing training for the CPL, MPL and ATPL and the associated ratings and certificates can be found at AMC1 ORA.GEN.215. For ATO's providing training for the LAPL, PPL, SPL, or BPL and the associated ratings and certificates refer to AMC 2 ORA.GEN.215.

27. Operational Publications

27.1 Required publications

27.1.1 The following operational publications shall be immediately available to students and staff and, where applicable, kept current by amendments.

- CAP 393 - Air Navigation: The Order and the Regulations
- CAP 804
- EASA Part-FCL
- EASA Part-ORA
- OEB/OSD reports
- UK Aeronautical Information Publication including Danger Area and Area of Intensive Aerial Activity (AIAA) Charts and Notam Class II supplements. (CD-Rom versions of the AIP will be acceptable or icon linked versions held on a computer provided that it can be shown that students have unrestricted and immediate access to them)
- Aeronautical Information Circulars
- Flight Manuals for the aircraft used on the course(s) and Standard meteorology reports and forecasts (in document or computer based formats)
- Flight planning documents
- NOTAMs

- Where applicable SID/STAR charts and aerodrome Instrument Approach Charts. These may be proprietary flight guides acceptable to the CAA, e.g. AERAD, Jeppesen

- CAA Information Notices

27.2 Other Publications

27.2.1 The following additional publications shall be immediately available to students and staff and, where applicable, kept current by amendments:

- ATO Operations Manual

- ATO Training Manual(s)

- ATO Safety Management System and Compliance Monitoring Manuals

- Standards Documents 1(A), 1(H), 3(A), 3(H) 11 and 55.

www.caa.co.uk\fclstandards

27.3 Guidance Material

27.3.1 To assist ATOs in the production of OM, TM and OMM a "User Guide for ATO Manuals" has been produce at Appendix F.

27.4 Electronic Documentation

27.4.1 Where documents are maintained in electronic format they shall be provided on one or more computers dedicated for this purpose. The number of computers shall reflect the number of students. They shall be located in such a manner that students have access without having to enter staff offices. A form of electronic document control shall be employed that identifies the documents held in electronic format and the current amendment state of each document. Web-based documentation will not be acceptable.

28. Training Manual and Operations Manual

Under Part-ORA.ATO.130 an ATO is required to prepare and maintain a TM and OM containing information and instructions to enable staff to perform their duties and to give guidance to students on how to comply with the course.

The Manual format detailed in AMC1 ORA.ATO.230(a)(b) shall be used by an ATO providing CPL, MPL, and ATPL and associated ratings and certificates.

Where an ATO has made arrangements for a component of an approved course to be provided by another organisation (e.g. MCC element of an ATPL integrated course), the HT of the ATO holding the approval must ensure that the other organisation is provided with and maintains up to date copies of the required Training Manual and Operations Manual and, if appropriate, approved aircraft check lists.

ATO content checklists to assist in the preparation of the Training and Operations Manual are at Annexes D and E respectively.

All manuals submitted for approval should be accompanied with this completed checklist certifying that the manual complies with the relevant requirements. Failure to do so could lead to additional time needed to approve the manual incurring additional cost to the organisation.

When resubmitting a manual following any amendment, this being a requirement under Part-ORA, the procedure at Appendix F must be followed and the completed "Manual Amendment Notification" form submitted to Approvals Support.

Document control shall be identified as one of the management system key processes addressed by ORA.GEN.200(a)(5). A Generic Quality Manual is provided at Appendix G for guidance.

It should be noted that from 17 September 2012, any manuals or applications submitted for approval by the CAA which requires approval work exceeding the basic threshold hours, as applicable to the individual course basic fee under the CAA Scheme of Charges, will incur hourly rate charges in addition to the basic fee as set out in the Scheme. These will be applied on a monthly basis retrospectively.

28.1 Training Manual

28.1.1 ATOs offering training courses for both aeroplanes and helicopters shall produce separate Training Manuals for each course. ATOs offering modular training courses are recommended to produce separate Training Manuals for each modular course, so that candidates are not presented with material that does not relate to their course of training.

28.1.2 The Training Manual shall state for each course the Aim, the Entry Requirements for that course, the objectives and training goals for each phase of training and the standards required at the end of each exercise, so that students are in no doubt about what is required of them at any stage. The Training Manual shall include the following parts:

- Part 1 The Training Plan

- Part 2 Briefing and Air Exercises

- Part 3 Flight training in an FSTD, if applicable

- Part 4 Theoretical Knowledge Instruction

28.1.3 Details of the contents of these parts are provided in ORA.ATO.230 and AMC1 ORA.ATO.230(a) for ATOs providing training for CPL, MPL and ATPL and associated ratings and certificates.

28.1.4 Customers that sponsor students (e.g. airlines) sometimes specify training requirements additional to the minimum course requirements found in Part-FCL. A full statement of these additional requirements is also to be included in the Training Manual.

28.1.5 A TM should not include flight exercise briefing material. Its primary purpose is to advise the student WHAT they will be doing and WHEN; rather than HOW. There should be a clearly defined aim for each exercise directed at the student not the instructor; "to teach" is an instructor aim, where as "to learn" or "to be able to" are student aims. The purpose of the Skill Test is to determine if the aim has been achieved; the test should not form part of the aim. Exercise content should list the specific skill items that will be taught/practiced during an exercise. Each exercise brief should have a concise statement of what standard the student is expected to achieve on completion of the exercise. This should be a measurable quantity against which the student may be judged.

28.1.6 The format and content of an ATO TM providing training for class and type ratings is not compatible with the format of an airlines Operations Manual Part D required by EU OPS. It is therefore required that a separate ATO Training Manual be produced which addresses type rating training only. Not all areas that are covered in the OM Part D should be included in the ATO TM.

28.2 Operations Manual

28.2.1 The Operations Manual shall provide relevant information to particular groups, e.g. instructors, students and operations staff;

    a) General
    b) Technical
    c) Route
    d) Staff Training

28.2.2 ATOs established within an organization that holds an AOC will have an Operations Manual approved under EU OPS. However, a separate Operations Manual is required specifically covering ATO training courses in accordance with Part-FCL requirements. Guidance on the content of an ATO Operations Manual can be found at AMC1 ORA.ATO.230(b).

29. Management System

ORA.GEN.115; ORA.GEN.200

29.1 Management System Documentation

29.1.1 ORA.GEN.115 requires ATOs to provide the competent authority with documentation demonstrating how they will comply with the requirements established in Regulation (EC) No 216/2008 and its implementing rules. ORA.GEN.200 requires that all management system key processes be documented. Guidance has been developed to help organisations in their understanding of the SMS concept and of the development of management policies and processes to implement and maintain an SMS that will comply with the EASA Aircrew Regulation. It is the responsibility of the organisation to identify the document to be used. The information may be contained in any of the organisations manuals (e.g. Organisations Management Manual, Operations Manual or Training Manual), which may also be combined. If the Organisations Management Manual (OMM) is partly or totally incorporated in other documents of the organisation, it is the responsibility of that organisation to provide a cross reference table clearly identifying all the various elements of the management system.

29.2 Safety Management System

29.2.1 The EASA Aircrew Regulation includes in Annex VII (Part-ORA) a requirement for an ATO to have a Safety Management System (SMS).

29.2.2 The CAA website provides SMS guidance on the requirements for small non-complex organisations (generally less than 20 employees but there are other discriminators) and separate guidance for large complex organisations. The SMS guidance entitled "SMS Evaluation Framework/Gap Analysis" can be found at the following link: www.caa.co.uk/sms

29.2.3 It is recommended that all applicants read the guidance notes contained in the "Small non-complex organisations" section as these give more comprehensive guidance than in the "Complex organisations" notes.

29.2.4 There are two options for ATOs:

- Demonstrate a fully established SMS; or

- An effective SMS implementation plan by 8 April 2013 including milestones for achieving an effective SMS by 8 April 2014.

29.2.5 Completion and submission of the relevant self-assessment checklist, found in the aforementioned guidance material, will suffice for the second option. Where questions are answered with a "no" or "partial" then proposed actions to achieve

compliance should be specified and the time scale stated for implementation. "Partial" or "yes" answers should bear the reference to where the requirement is captured or partially captured in the SMS documentation. Progress towards compliance will be monitored by the CAA.

29.2.6 For RTFs the compliance date is the 8 April 2015, by which time Registered Facilities must be approved as an ATO compliant with Part-ORA.

29.3 SMS Evaluation

29.3.1 The SMS evaluation is designed to assess the compliance and performance of an organisation's SMS. The organisation must be able to demonstrate that the necessary structures, accountabilities, policies and procedures are in place and it is managing its risks effectively. The scope of the evaluation will take into account the size, nature and complexity of the approved organisation.

29.3.2 When looking at an organisation's SMS, it is important to consider the risks faced by the organisation that sit outside its direct control i.e. third party contracted organisations and how these risks are being managed and controlled by those external organisations.

29.4 SMS Oversight

29.4.1 SMS oversight uses two different evaluation forms that are available on the CAA website. The Phase 1 SMS assessment determines whether the key elements of an SMS are in place (present and suitable). Phase 2 assesses whether the SMS is operating and effective and looks for best practice and signs of excellence. Both are intended to be completed by the organization but in some cases this may be done during an assessment by CAA oversight personnel. The assessment consists of:

- Phase 1 Evaluation framework as an initial assessment

  i) For a new applicant;

  ii) For an existing approved organisation implementing SMS as part of EASA transition arrangements.

- Phase 2 Evaluation tool to assess SMS effectiveness

  i) For a new applicant within 1 year of the approval being issued;

  ii) For an existing approved organisation implementing SMS as part of EASA transitional arrangement and has achieved at least 80% of Phase 1;

  iii) For continued oversight of an organisation's SMS.

Failure to achieve this requirement will result in the suspension of the approval

29.5 Compliance Monitoring

29.5.1 AMC1 ORA.GEN.200(a)(6) describes the requirements and procedures an organisation must adopt to monitor compliance with the relevant stipulations of Part-ORA and other applicable Parts. The Accountable Manager should designate a Compliance Monitoring Manager to ensure that the activities of the organisation are monitored for compliance with the applicable regulatory requirements, and any additional requirements established by the organisation, and that these activities are being carried out properly under supervision of the relevant head of functional area. The organisational set-up of the compliance monitoring function should reflect the size of the organisation and the nature and complexity of its activity.

30   Requirements for Entry to Training

For details of the prerequisites for entry onto a course of training refer to CAP 804 Part 1, Section 4.

30.1   Medical

30.1.1   A student enrolled for training must possess the relevant and mandatory Class of Medical Certificate for the course of training being undertaken issued in accordance with Part-MED.A.030.

30.2   Integrated Courses

30.2.1   On integrated courses it is recommended that theoretical knowledge should be integrated throughout the flying training syllabus.

30.2.2   ATO's are to ensure students have attained a suitable educational standard in mathematics, physics and English so that realistically, they may successfully follow and complete the course. It is therefore in the student's interest that he/she has an educational background sufficient to enable him/her to keep pace with the theoretical knowledge training programme without undue difficulty.

30.3   Modular Courses

30.3.1   On modular courses the principal theoretical knowledge instruction is completed as a separate module to the flight training. It is designed to cover the syllabus and prepare the student for the ground examinations. Part-FCL.030(a) specifies that before a candidate may take a skill test for the issue of a licence or rating, the applicant shall have passed the associated theoretical knowledge examinations.

Appendix A: Links for Application forms: Part-FCL Courses

Personnel:	Nomination of Key personnel		www.caa.co.uk/srg2115
Approved Training Organisations	Aeroplane courses Helicopter courses Seaplane courses	• MPL • ATPL • CPL • IR • MCC • SP ME • PPL • LAPL • TRTO • Assessor Aviation English • Instructor Courses • Examiner Courses • Flight Test Courses	www.caa.co.uk/srg2116
Approved Training Organisations:	Sailplane Courses Airship Courses Balloon Courses Powered Lift Courses	• CPL • IR • LAPL • PPL • SPL • BPL • MCC • Instructor Courses • Examiner Courses	www.caa.co.uk/srg2118
Accredited Organisations:	Language Proficiency	• Assessor Aviation English	www.caa.co.uk/srg2119
Approved Training Organisations:	Instructor Seminars	• FI • IRI • CRI	www.caa.co.uk/srg1196

Approved Training Organisations:	Examiner Seminars	• FE PPL • FE CPL • FIE etc	www.caa.co.uk/srg2136
Approved Training Organisations:	Examiner Standardisation Course	• FE PPL • FE CPL • FIE • TRE etc	www.caa.co.uk/srg2125

Links for Guidance material:

CAP804	www.caa.co.uk/CAP804
Standards documents	www.caa.co.uk/fclstandards

Appendix B

Certificate Of Course Completion

Type of course:

i.e. Single-Pilot Multi-Engine Class Rating /

Robinson 44 Type Rating /

Multi-Crew Co-operation Course etc)

Name: ………………………………………………………………………………….

Employed by: …………………………………………………………………………..

Licence number: ……………………….. **Course Number:** …………………………

This is to certify that the above named Pilot successfully completed a JAA / CAA Approved Single-Pilot Multi-Engine Class Rating / Type Rating Course / MCC in respect of the ……………………..(type) between ………………..(date) and   ………………..(date). Application is now made for the grant of the Aircraft Rating.

 *MCC REQUIREMENT SATISFIED BY   •   **COMBINED MCC/ TYPE RATING COURSE**

Where relevant)   **.** **MODULAR COURSE**

                                                                        • **INTEGRATED WITH ATP COURSE**

                                                                  • **MCC EXEMPT DUE PREVIOUS MULTI-PILOT A/C EXPERIENCE**

(***** delete those not applicable)

COURSE DETAILS

Ground Training: Course of Ground Training completed on: …………………………….

                                         Mark Awarded in the final exam: …………………………………………………

Fixed Base SIM: Course of: …… hrs …….. mins training completed on: ……………………..

or other Training

Device: ………………………………………………………………………………………….

Full Flight SIM: Course of …… hrs ……. mins training completed on ……………………………

Flight Simulation Training Device Approval Number: ……………………………..

Aircraft Training/   …….. hrs ...……. mins of training / testing completed on an aircraft

Test: completed on …………………. and included ……….. landings

Aircraft Registration: …………………………………………

Appendix C

Guidance: Legal Entity of the Applicant Organisation

Introduction

The CAA routinely receives applications for legal documents (e.g. Certificates, Licences, Permissions, Approvals, and Exemptions etc.). Before granting issue of these documents, it is important that the legal status of the applicant is established and the correct name of the entity is used. The CAA will only grant such documents to legal entities once these have been fully established or clarified as CAA wishes to ensure all parties are protected whether these are the applicant organisation, the students it trains or CAA itself in both legal matters and business matters.

Definition of a 'Legal Entity'

Legal entities take one of two forms:

● A natural person, or
● A body corporate

Natural Persons

A natural person is an individual such as 'John Smith'. All natural persons have rights and duties under the law and can be held accountable in the Courts. Natural persons are able to hold various legal documents granted by the CAA. In some instances, the CAA may ask for corroborating identification, such as a passport or birth certificate, before granting a document to a natural person. Natural persons carrying on a business are sometimes referred to as 'sole traders'.

Natural Persons and Trading Names

Natural persons may adopt one or more trading names under which to conduct business, e.g. Smith Aviation. The application form therefore should show John Smith as the Applicant and Smith Aviation as the Trading Name, for example.

Partnerships

Several individuals may join together to form a partnership under the Partnership Act (defined as the relation which subsists between persons carrying on business together with a view of profit). The partnership may adopt a name, e.g. the John Smith Partnership.

However, except in Scotland where, under the Partnership Act, a partnership has its own distinct personality, and unless it is a Limited Liability Partnership (LLP) which is a form of incorporated partnership, a partnership has no legal identity of its own and must be treated as a trading name.

All documents granted to a partnership should therefore show all the names of the individual partners, e.g. John Smith, Jane Smith, David Brown and Dianne Brown trading as the John Smith Partnership.

Clubs

Distinct from a partnership, several individuals may also join together to form a club as an unincorporated association through their agreeing to abide by common rules and members may leave and join the club via the same way. An unincorporated club has no distinct legal identity and club property is generally held by trustees on behalf of the club members, sometimes the chairman and club secretary.

Where therefore a certificate or other document is to be issued to an unincorporated club, it will be necessary to determine in whose names the certificate is to be held in accordance with the club's rules.

If the club is incorporated, as for example if it is a limited liability company, the document will be issued in the name of that company.

Bodies Corporate – Great Britain

There are many different forms of GB body corporate, but the most common are:

- Limited Liability Companies,
- Companies limited by guarantee; and
- Limited Liability Partnerships.

Whatever form it takes, everybody corporate will be able to produce documentary evidence of its incorporation, usually an official copy of the certificate of registration issued by the Companies Registrar.

GB Limited Companies

In Great Britain, companies can either be private limited companies (e.g. Smith Aviation Ltd), public limited companies (e.g. Smith Aviation PLC) or companies that are limited by guarantee. In all cases they will have been registered at Companies House.

Documents granted must show the complete and accurate name of the company, including punctuation such as spaces, full stops and brackets, (e.g. Smith Aviation (2001) Ltd). Apart from the use of Ltd (which is short form for Limited) and Plc (which is short form for public limited company) no abbreviations should be used unless they are actually used within the company's name. Any application forms should therefore have the legally accurate name of the company, including spaces, punctuation etc as registered with Companies House.

Each company has additionally a unique registration number that is allotted to it on its incorporation and which cannot be changed or transferred, even when a company changes its name. This number should be entered on any application form where requested by UK CAA.

GB Limited Liability Partnerships (LLP)

LLPs will have been registered at Companies House and should be treated in the same way as limited companies.

Non-GB Limited Companies

Companies based outside Great Britain will have been subject to a registration process in the country of registration. This process will have resulted in the generation of documentary evidence, such as Certificates of Incorporation. CAA policy requires sight of copies of such evidence before granting documents to non-GB limited

companies (**note:** If the certificates etc. are in a foreign language these will be required to be submitted in the original language with a translated version submitted also.

Bodies Corporate and Trading Names

Bodies corporate may, like natural persons, adopt trading names. For guidance, see 'Trading Names' section below.

Trading Names

Natural persons and bodies corporate may adopt one or more trading names. The trading name is not the name of the legal entity – indeed, several different legal entities could, in theory, adopt the same trading name. The CAA has therefore undertaken to issue all documents in the legal name of the Body Corporate or Natural Person.

Where the applicant has informed the CAA that they wish to adopt a trading name , e.g. on the application form, this will additionally be shown on the document in addition to, but not instead of, the legal name, e.g. John Smith trading as Smith Aviation, or Smith Aviation Ltd trading as Smithair.

However, there are two circumstances in which CAA may wish to query or refuse a request:

- Firstly, where the trading name does not seem to be properly reflected in the documentation produced by the company. The organisation will make clear that there is no confusion in-house as to what procedures, manuals or other forms and records they should be utilising. There must be consistency in the way the organisation is described in its own documentation and material. The CAA will query the position with the applicant where this is not the case.

- Secondly, and of less importance – because the CAA is not responsible for regulating the use of trading names – where the trading name seems potentially confusing the CAA may query it with the applicant, e.g. Bloggs Air Limited trading as British Airways.

Legal Entity Identification

In order to regulate effectively, the CAA needs to be clear about the identity of the organisations with which it is dealing. The CAA will therefore insist that all correspondence, manuals and other documents submitted in support of applications, or in the course of routine regulatory oversight, clearly identify the appropriate legal entity.

It should be noted that whilst a company can change its name one or more times over its lifetime and that two different companies can have the same name albeit not at the same time (this is not uncommon in group reorganisations and in company liquidations where the liquidators of the company may sell the name to another company, sometimes to its former management) each company has a unique registration number that is allotted to it on its incorporation and which cannot be changed or transferred. It is therefore recommended that an incorporated company has this number included in its documentation and correspondence.

Changes to the Organisation (Change of name, Re-Organisation etc)

Any application for the amendment of an organisation certificate should be submitted at least 30 days, before the date of intended changes. Unforeseen changes should be notified at the earliest possible opportunity, in order to enable the CAA to determine continued compliance with the EASA Aircrew Regulation.

Change of Name only:

Where an organisation changes its name only but retains the same company number with Companies House, a copy of the Companies House certificate verifying the change should be submitted with a covering letter, a completed application form and the appropriate CAA administration charge. Amendment pages will additionally need to be issued for the company's approved manuals held by CAA. Subject to all submissions being satisfactory, the ATO approval certificate will be re-issued in the new company name.

Re-organisations, Mergers etc.

It should be noted however that an approval once issued is <u>NOT</u> transferable. Therefore, an application must be made for a new approval to be issued if there is going to be a substantial change in the organisation circumstances, for example, where a ATO changes its name and ownership or enters into an arrangement to 'move / merge' an approval to/with another ATO**.**

L&TS Approvals Support should be notified at the earliest possible opportunity if such a change is going to take place, in order that advice can be given on what needs to be done to facilitate the issue of a new approval as expeditiously as possible.

Appendix D

OPERATIONS MANUAL CONTENT CHECKLIST

This checklist is designed as an aid to ensuring that an Operations Manual submitted for approval contains all the relevant entries but should only contain those paragraphs that are relevant to the course(s) applied for.

Although not mandatory, please note that failure to submit the checklist with the application documentation could result in a protracted delay to the Manual approval procedure and additional costs for the grant of the approval.

This Operations Manual has been compiled with the requirements of Part FCL AMC1-OR.ATO.230(d)

Part 1 General Section

Checklist Item	Company Manual Reference	CAA Notes
• A list of effective pages and version number, a list and description of all volumes in the Operation manual plus all other requirements as detailed in the CAA document control guide.		
• Administration (function and management)		
• Responsibilities (all management and administrative staff) to include latest definitions as per ORA.GEN.210		

Checklist Item	Company Manual Reference	CAA Notes
• List of all Training Sites and the approved courses conducted at each.		
• List of Approved signatories to include scope of authority, e.g. course completion certificates etc. This should include the criteria by which these people are considered appropriately qualified and a sample of their signature.		
• Alternative means of compliance as detailed in ORA.GEN.120. Does the school have any agreed AMCs and what procedure is used to assess and demonstrate compliance with the regulation?		
• Procedure by which OEM manual, checklist and documentation changes are tracked and implemented in the course and any examination papers		
• Student discipline and disciplinary action		
• Approval/ Authorisation of flights		
• Preparation of flying programme (including weather restrictions)		
• Command of aircraft		
• Responsibilities of pilot-in-command		

• Carriage of Passengers		
Checklist Item	**Company Manual Reference**	**CAA Notes**
• Aircraft documentation		
• Retention of documents		
• Flight crew qualification records (licences and ratings.)		
• Revalidation (medical certificates and ratings)		
• Flying duty period and flight time limitations (flying instructors)		
• Rest periods (flying instructors)		
• Rest periods (students)		
• Pilots logbooks		
• Flight Planning (General.)		
• Safety (General) - equipment, radio listening watch, hazards, accidents and incidents (including reports), safety pilots etc.		
• Occurrence reporting as per ORA.GEN.160.		

Part 2 Technical Section

Checklist Item	Company Manual Reference	CAA Notes
• Aircraft descriptive notes		
• FSTD descriptive notes if applicable		
• Aircraft handling (including checklists, limitations, aircraft maintenance and technical logs, in accordance with relevant requirements etc.)		
• Emergency procedures		
• Radio and radio navigation aids		
• Allowable deficiencies (based on MMEL if available.) • This should include the means by which the training impact of any deficiency is monitored and managed.		

Part 3 Route Section

Checklist Item	Company Manual Reference	CAA Notes
• Performance (legislation, take-off, route, landing)		
• Flight Planning (fuel, oil, minimum safe altitude, navigation equipment)		
• Loading (load sheets, mass and balance, limitations)		
• Weather minima (Flight instructors)		
• Weather minima (students at various stages of training)		
• Training routes/areas including airfield details applicable to the type of proposed training.		

Part 4 Personnel Training

Checklist Item	Company Manual Reference	CAA Notes
• Appointment of persons responsible for standards/competence of flying staff including persons nominated by ATO for Revalidation and Renewal of MCCI certificate iaw FCL.930(a)(3) if applicable.		
• Initial training		This should include instructor IOS and emergency training if FSTDs are used.
• Refresher training		
• Standardisation training		
• Proficiency checks		
• Upgrading training		
• ATO personnel standards evaluation		

To be completed by an Independent (Company) Representative

I confirm that the content of the Operations Manual complies with the Part-FCL requirements currently applied.

Signed…………………………………….   Name………………………..……   Position Held……….…………….……   Date………….…...

Appendix E

TRAINING MANUAL CONTENT CHECKLIST

This checklist is designed as an aid to ensuring that a Training Manual submitted for approval contains all the relevant entries but should only contain those paragraphs that are relevant to the course(s) applied for. For example Part 3, Synthetic Flight Training, should be listed as 'Not Applicable' if no synthetic training device (STD) is to be used.

Although not mandatory, please note that failure to submit the checklist with the application documentation could result in a protracted delay to the Manual approval procedure.

This Training Manual has been compiled with the requirements of Part FCL AMC1-OR.ATO.230(c) The Training Manual includes the following parts:

Part 1	The Training Plan				
Sub-part	1 Title	Content	Our Manual Ref.	N/A or Remarks	For CAA Use Only
1.1	**The aim of the course**	A statement of what the student is expected to do as a result: (i) of the training, (ii) the level of performance, (iii) and the training constraints to be observed.			
1.2	**Pre-entry requirements**	(i) Minimum age (ii) Educational requirements (inc language) (iii) medical requirements (iv) any individual member state requirements			
1.3	**Credits from previous experience**	Obtained from the competent Authority before training begins.			
1.4	**Training Syllabi**	(i) The flying syllabus (single-engine) (ii) The flying syllabus (multi-engine) (iii) The synthetic flight training syllabus			

		(iv) The theoretical knowledge training syllabus			
1.5	**The time scale and scale, in weeks, for each syllabus**	Arrangements of the course and the integration of syllabi time.			
1.6	**Training Programme**	(i) A general arrangements of daily and weekly programmes for flying, ground and synthetic flight training. (ii) Bad weather constraints; i.e. if the weather precludes flying. (iii) Programme constraints in terms of maximum student training times, (flying, theoretical knowledge, synthetic) e.g. per day/week/month. (iv) Restrictions in respect of duty periods for students. (v) Duration of dual and solo flights at various stages. (vi) Maximum student flying hours in any day/night; maximum number of training flights in any day/night. (vii) Minimum student rest period between duty periods.			
1.7	**Training records**	(i) Rules for security of records and documents (ii) Attendance records (iii) The form of training records to be kept. (iv) Persons responsible for checking records and students' log books. (v) The nature and frequency of record checks. (vi) Standardisation of entries in training records. (vii) Rules concerning log book entries			
1.8	**Safety training**	(i) Individual responsibilities (ii) Essential exercises (iii) Emergency drills (frequency) (iv) Dual checks (frequency at various stages) (v) Requirement before first solo day / night / navigation etc.			

1.9	**Tests and Examinations**	(i) Flying
		        (a) Progress checks
		        (b) Skill tests
		(ii) Theoretical Knowledge
		        (a) Progress tests			

		(b) Theoretical knowledge examinations (iii) Authorisation for test. (iv) Rules concerning refresher training before retest. (v) Test reports and records. (vi) Procedures for examination paper preparation, type of question and assessment, standard required for 'Pass'. (vii) Procedure for question analysis and review and for raising replacement papers. (viii) Examination re-sits procedures.			
1.10	**Training effectiveness**	(i) Individual responsibilities. (ii) General assessment. (iii) Liaison between departments. (iv) Identification of unsatisfactory progress (individual students). (v) Actions to correct unsatisfactory progress. (vi) Procedure for changing instructors. (vii) Maximum number of instructor changes per student. (viii) Internal feedback system for detecting training deficiencies. (ix) Procedure for suspending a student from training. (x) Discipline. (xi) Reporting and documentation			
1.11	**Standards and Level of performance at various stages**	(i) Individual responsibilities. (ii) Standardisation. (iii) Standardisation requirements and procedures. (iv) Application of test criteria.			

Part 2	**Briefing and Air Exercises**

Sub-part	1 Title	Content	Our Manual Ref.	N/A or Remarks	For CAA Use Only
2.1	**Air Exercises**	A detailed statement of the content specification of all the air exercises to be taught, arranged in the sequence to be flown with main and sub-titles.			
2.2	**Air exercise reference list**	An abbreviated list of the above exercises giving only main and sub-titles for quick reference, and preferably in flip-card form to facilitate daily use by flight instructors			
2.3	**Course structure – phase of training**	(i) A statement of how the course will be divided into phases, indication of how the above air exercises will be divided between the phases and how they will be arranged to ensure that they are completed in the most suitable learning sequence and that essential (emergency) exercises are repeated at the correct frequency. (ii) Also, the syllabus hours for each phase and for groups of exercises within each phase shall be stated and when progress tests are to be conducted, etc.			
2.4	**Course structure integration of syllabi**	The manner in which theoretical knowledge, synthetic flight training and flying training will be integrated so that as the flying training exercises are carried out students will be able to apply the knowledge gained from the associated theoretical knowledge instruction and synthetic flight training.			
2.5	**Student progress**	(i) The requirement for student progress and include a brief but specific statement of what a student is expected to be able to do and the standard of proficiency he must achieve before progressing from one phase of air exercise training to the next. (ii) Include minimum experience requirements in terms of hours, satisfactory exercise completion, etc. as necessary before significant exercises, e.g. night flying.			
2.6	**Instructional methods**	The ATO requirements, particularly in respect of pre- and post-flying briefing, adherence to syllabi and training specifications, authorisation of solo flights, etc.			
2.7	**Progress tests**	The instructions given to examining staff in respect of the conduct and documentation of all progress tests.			
2.8	**Glossary of terms**	Definition of significant terms as necessary.			

2.9	**Appendices**	(i) Progress test report forms (ii) Skill test report forms (iii) ATO certificates of experience, competence, etc. as required.			
Part 3	**Synthetic Flight Training**				
Sub-part	**2 Title**	**Content**	**Our Manual Ref.**	**N/A or Remarks**	For CAA Use Only
3.1	**Air Exercises**	A detailed statement of the content specification of all the air exercises to be taught, arranged in the sequence to be flown with main and sub-titles.			
3.2	**Air exercise reference list**	An abbreviated list of the above exercises giving only main and sub-titles for quick reference, and preferably in flip-card form to facilitate daily use by flight instructors			
3.3	**Course structure – phase of training**	(i) A statement of how the course will be divided into phases, indication of how the above air exercises will be divided between the phases and how they will be arranged to ensure that they are completed in the most suitable learning sequence and that essential (emergency) exercises are repeated at the correct frequency. (ii) Also, the syllabus hours for each phase and for groups of exercises within each phase shall be stated and when progress tests are to be conducted, etc.			
3.4	**Course structure integration of syllabi**	The manner in which theoretical knowledge, synthetic flight training and flying training will be integrated so that as the flying training exercises are carried out students will be able to apply the knowledge gained from the associated theoretical knowledge instruction and synthetic flight training.			
3.5	**Student progress**	(i) The requirement for student progress and include a brief but specific statement of what a student is expected to be able to do and the standard of proficiency he must achieve before progressing from one phase of air exercise training to the next. (ii) Include minimum experience requirements in terms of hours, satisfactory exercise completion, etc. as necessary before significant exercises, e.g. night flying.			

3.6	**Instructional methods**	The ATO requirements, particularly in respect of pre- and post-flying briefing, adherence to syllabi and training specifications, authorisation of solo flights, etc.			
3.7	**Progress tests**	The instructions given to examining staff in respect of the conduct and documentation of all progress tests.			
3.8	**Glossary of terms**	Definition of significant terms as necessary.			
3.9	**Appendices**	(i) Progress test report forms (ii) Skill test report forms (iii) ATO certificates of experience, competence, etc. as required.			

Part 4	Theoretical knowledge instructions				
Sub-part	**3 Title**	**Content**	**Our Manual Ref.**	**N/A or Remarks**	For CAA Use Only
4.1	**Structure of the theoretical knowledge course**	(i) A statement of the structure of the course, (ii) including the general sequence of the topics to be taught in each subject, (iii) the time allocated to each topic, the breakdown per subject and (iv) an example of a course schedule. (v) Distance learning courses should include instructions of the material to be studied for individual elements of the course.			
4.2	**Lesson Plans**	(i) A description of each lesson or group of lessons (ii) including teaching materials (iii) training aids (iv) progress test organisation and (v) inter-connection of topics with other subjects			
4.3	**Teaching materials**	Specification of training aids to be used (e.g. study materials, course manual references, exercises, self-study materials, demonstration equipment).			
4.4	**Student progress**	The requirement for student progress, including a brief but specific statement of the standard that must be achieved and the mechanism for achieving this, before application			

		for theoretical knowledge examinations.			
4.5	**Progress testing**	The organisation of progress testing in each subject, including topics covered, evaluation methods and documentation.			
4.6	**Review procedure**	The procedure to be followed if the standard required at any stage of the course is not achieved, including an agreed action plan with remedial training if required.			

To be completed by an Independent (Company) Representative

I confirm that the content of the Training Manual complies with the Part FCL requirements currently applied.

Signed…………………………………. Name……………………..…… Position Held………………..…… Date…………..…..

Appendix F
User Guide for ATO Manuals

The suggested distribution below maybe used to prepare and produce an ATO Part-ORA documentation system.

This table may be used by a Part-ATO to cross reference the content and the organisation of its manuals with those Part-ORA requirements applicable to its scope of approval as appropriate to its size and complexity. To assist the Authority in the Approval of new or amended manuals, it is recommended that the ATO submits a completed copy of this "User Guide" together with the manual content checklist. The "**For use by ATO"** column should be used to identify the necessary requirements.

Item	Part ORA ref	For use by ATO	Suggested distribution			Note
ID			OMM	OM	TM	
1.	ORA.GEN.115 (b)		x			Documentation demonstrating how the ATO will comply with the requirements established in Regulation (EC) No 216/2008 and its Implementing Rules: Cross reference table to demonstrate that all applicable requirements are covered in one way or another by the proposed documents. Procedure describing how changes not requiring prior approval will be managed and notified to the competent authority: Formal description of the procedure and related process. (see also ORA.GEN.130 (c))
2.	ORA.GEN.120 (a)		x			Cross reference table referred to in the note of item 1 related to ORA.GEN.115 (b) shall include all applicable AMCs and GM implemented by ATO.
3.	ORA.GEN.120 (b)		x			Description of related process/procedures to meet the requirement
4.	ORA.GEN.125		x			In case the organisation is approved under multiple regulation systems (Own National Regulation, EU Part-ORA, other Third Country National Regulations ...) the ATO shall have a process described and implemented to ensure that activities under the scope of Part-ORA approval are clearly identified and distinguished from other activities conducted under other approval systems. The manual shall indicate how these activities are related to different independent processes. Any potential uncertainty between activities conducted under different approvals shall be identified

			x			and addressed so that the approved training remains continuously within the scope and privileges defined in the terms of approval attached to the organisation's Part-ORA certificate. Example: Delivering a **Part FCL course completion certificate** related to a course for a licence, rating, certificate, authorisation and/or qualification **out of the scope of the organisation's EASA Part-ORA approval** (Such as a course for a licence not compliant with Part FCL regulation) shall be **efficiently prevented.**
5.	ORA.GEN.130 (a)(1)		x			A process for making personnel aware of this part of the requirement shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e).
6.	ORA.GEN.130 (a)(2)		x			A process for making personnel aware of this part of the requirement shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e).
7.	ORA.GEN.130 (b)		x			Description of related process/procedures to meet the requirement.
8.	ORA.GEN.130 (c)		x			Description of related process/procedures to meet the requirement.
9.	ORA.GEN.135 (a)(3)		x			Description of related process/procedures to meet the requirement.
10.	ORA.GEN.135 (b)		x			Description of related process/procedures to meet the requirement.
11.	ORA.GEN.140 (a)		x			A process for making personnel aware of this part of the requirement shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e). Confirmation that there is no restricted access resulting from special national or local regulation(s). If special procedures are needed to access restricted areas, the process to grant access in compliance with ORA.GEN.140 shall be described and implemented. Failure to give the Agency (or the entity conducting the technical investigation) access to the organisation's facilities as defined in ORA.GEN.140 during normal operating hours and after two written requests may result in a level 1 finding as provided by ARA.GEN.350 (b)(1).
12.	ORA.GEN.140 (b)		x			When applicable, the ATO will be informed to enable the organisation to address this requirement as indicated in ORA.GEN.140 (a).

13.	ORA.GEN.155 (a)		x			Shall be part of the compliance monitoring required by ORA.GEN.200 (a)(6) Shall be included in cross reference table referred to in the note of item 1 related to ORA.GEN.115 (b)
14.	ORA.GEN.155 (b)		x			Shall be part of the compliance monitoring required by ORA.GEN.200 (a)(6) Shall be included in the cross reference table referred to in the note of item 1 related to ORA.GEN.115 (b)
15.	ORA.GEN.160 (a)		x			Description of related process/procedures to meet the requirement A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)
16.	ORA.GEN.160 (b)		x			Description of related process/procedures to meet the requirement A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)
17.	ORA.GEN.160 (c)		x			Description of related process/procedures to meet the requirement A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)
18.	ORA.GEN.160 (d)		x			Description of related process/procedures to meet the requirement A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)
19.	ORA.GEN.160 (e)		x			Description of related process/procedures to meet the requirement A process for making personnel aware of their roles and responsibilities shall be described and implemented in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e)
20.	ORA.GEN.200 (a)(1)		x			
21.	ORA.GEN.200 (a)(2)		x			

22.	ORA.GEN.200 (a)(3)		x			
23.	ORA.GEN.200 (a)(4)		x			
24.	ORA.GEN.200 (a)(5)		x			Management system key processes shall be clearly identified and listed in cross reference table referred to in the note of item 1 related to ORA.GEN.115 (b)
25.	ORA.GEN.200 (a)(6)		x			
26.	ORA.GEN.200 (a)(7)		x			The ATO shall consider relevant AMCs and GM related to the evidence of sufficient funding as an additional requirement
27.	ORA.GEN.200 (b)		x			Taking into account the hazards and associated risks inherent in these activities: Shall be demonstrated according to ORA.GEN.200 (a)(3)
28.	ORA.GEN.205 (a)		x			Description of related process/procedures to meet the requirement.
29.	ORA.GEN.205 (b)		x			Description of related process/procedures to meet the requirement.
30.	ORA.GEN.210 (a)		x			
31.	ORA.GEN.210 (b)		x			The compliance monitoring system shall be described including the list, the role and the responsibilities of each individual, be it one single person or a group
32.	ORA.GEN.210 (c)		x			Description of related process/procedures to meet the requirement.
33.	ORA.GEN.210 (d)		x			
34.	ORA.GEN.210 (e)		x			This requirement shall be part of the document control process as described in Part 2 para 28.
35.	ORA.GEN.215		x/p	x/p	x/p	Description of related process/procedures to meet the requirement List of such facilities with related characteristics and scope of use (to be included in OM or TM as appropriate).

36.	ORA.GEN.220 (a)		x			
37.	ORA.GEN.220 (b)		x			
38.	ORA.GEN.220 (c)		x			Applicable data protection legislation shall be stated and personnel made aware of their roles and responsibilities in accordance with ORA.GEN.200 (a)(4), ORA.GEN.200 (a)(5) and ORA.GEN.210 (e) A process to inform trainees shall be described and implemented.
39.	ORA.ATO.105 (a)(1)(i)		x			Should match the information provided in the Application From.
40.	ORA.ATO.105 (a)(1)(ii)		x			Should match the information provided in the Application From.
41.	ORA.ATO.105 (a)(1)(iii)		x/p	x/p	x/p	Should match the information provided in the Application From Nominated post holders, qualifications requirements, training requirements and administrative roles can be described in the OMM. Functions, roles and responsibilities related to operations and training can be described in OM and TRM respectively See for example: ORA.ATO.110 (a), ORA.ATO.110 (b)(1), ORA.ATO.110 (b)(2), ORA.ATO.110 (b)(3), ORA.ATO.110 (c)(1), ORA.ATO.110 (c)(2) below
42.	ORA.ATO.105 (a)(1)(iv)		x/or	x/or	x/or	Should match the information provided in the Application From. When providing flight training on aircraft or balloons, an ATO shall have continuous use of an airport and a pilot briefing area. This can be demonstrated by the school having a written agreement showing that it has continuous use of those facilities for at least the time needed to complete the training courses covered by the approval at the time of certification or renewal of certificate.
43.	ORA.ATO.105 (a)(1)(v)		x/or	x/or	x/or	Should match the information provided in the Application From. If a training aircraft is not own by the ATO, details of the contracts or arrangements related to its use for training and all related processes and procedures shall be documented
44.	ORA.ATO.105 (a)(1)(vi)		x/or	x/or	x/or	Should match the information provided in the Application From. If FSTDs are not owned by the ATO, details of the contracts or arrangements related to its use for training and all related processes and

						procedures shall be documented

45	ORA.ATO.105 (a)(1)(vii)					x	Courses to be provided under the scope of the EASA Part-ORA approval sought, shall be indicated so that:
							
							• The course name or identifier is unique for each course but also unique for each different version of the same course (if any). Similar courses with different syllabuses or entry levels, different breakdown or sequencing of the theoretical/flight/simulator sessions, are to be considered different.
							
							• The course FCL type indicated refers to a Part-FCL course as identified by the relevant requirement in Aircrew Regulation 1178/2011 as amended
							
							Examples:
							
							• Course name or ref. PPL-08V001b;
							  for a course according to .... PPL(A) FCL.210.A(b)
							  indicating a PPL (A) course for .... trainees holding a LAPL(A)
							• Course name or ref. PPL-09V002;
							  for a course according to .... PPL(A) FCL.210.A(c)
							  indicating a PPL (A) course for .... trainees holding a LAPL(S) + TMG
							• Course name or ref. ATPL-A1/05;
							  for a course according to ....ATPL(A) Part-FCL Annex I §3.1
							  indicating an ATPL theoretical .... bridge course from (H) to (A)
							• Course name or ref. ATPL-H2/01;
							• for a course according to .... ATPL (H) Part-FCL Annex I §3.1
							• indicating an ATPL theoretical .... bridge course from (A) to (H)
							
							ATOs under Grandfathering shall refer to Part-FCL requirements that best reflect the JAR FCL approved course to be grandfathered as indicated above as much as possible. This list of courses must match the information provided in the Application Form

46	ORA.ATO.105 (a)(2)				x	x	Manuals to be provided for initial approval and reviewed for approval continuation. These manuals shall be submitted to the document control process described in Part 2 para 28

47	ORA.ATO.105 (b)(1)		x/or	x/or	x/or	See note related to item 42 for ORA.ATO.105 (a)(1)(iv)
48	ORA.ATO.105 (b)(2)		x/or	x/or	x/or	
49	ORA.ATO.105 (c)		x/or	x/or	x/or	The related document(s) shall be updated accordingly
50	ORA.ATO.110 (a)		x			See note related to item 41 for ORA.ATO.105 (a)(1)(iii)
51	ORA.ATO.110 (b)(1)				x	See note related to item 41 for ORA.ATO.105 (a)(1)(iii)
52	ORA.ATO.110 (b)(2)				x	See note related to item 41 for ORA.ATO.105 (a)(1)(iii)
53	ORA.ATO.110 (b)(3)				x	See note related to item 41 for ORA.ATO.105 (a)(1)(iii)
54	ORA.ATO.110 (c)(1)		x			See note related to item 41 for ORA.ATO.105 (a)(1)(iii) For each instructor the documents provided shall indicate which option of ORA.ATO.110 (c) applies
55	ORA.ATO.110 (c)(2)		x			See note related to item 41 for ORA.ATO.105 (a)(1)(iii) For each instructor the documents provided shall indicate which option of ORA.ATO.110 (c) applies
56	ORA.ATO.110 (d)		x			Description of related process/procedures to meet the requirement
57	ORA.ATO.120 (a)				x	Description of related process/procedures to meet the requirement
58	ORA.ATO.120 (b)				x	Description of related process/procedures to meet the requirement
59	ORA.ATO.120 (c)			x		Description of related process/procedures to meet the requirement
60	ORA.ATO.125 (a)				x	The organisation is expected to describe and implement a course design process to demonstrate its capacity to develop a training programme for each course offered. The organisation should be able to address following aspects (as applicable): • Course type (initial training / recurrent training / refresher training / specific training, …) • Course objectives

						• Entry level criteria / Students' prior abilities, competence, knowledge & skill / determination / assessment • Identification of training needs of all potential trainees / group of profiles … • Instructional strategies / Training methodology / Course Structure / Syllabus / Sequencing / Timing • Objective breakdown/ Module specification / design • Training material specification / design / production / procurement • Planning / calendar / course pace • Training standards • Training delivery / Resources / Equipment / Facilities • Instructors / Subject Matter Experts / Examiners / Assessors / Tutors / Human resources • Knowledge progress assessment / Attitude / Skill / evaluation / criteria • Hazard Identification / analysis / negative learning / undetected shortages in training provided / Human factors / Fatigue management / … • Risk mitigation and management / flight safety / … • Course validation / control • Course updating (new methods / changes in regulation) • Continued performance monitoring and improvement …
61	ORA.ATO.125 (b)				x	The cross reference table referred to in the note of item 1 related to ORA.GEN.115 (b) shall include all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO. A separate cross reference table including all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO is acceptable if it is clearly identified as part of the organisation's documentation system
62	ORA.ATO.130 (a)		x/p	x/p	x/p	The OMM shall contain a description of related management process/procedures to meet the requirement. This requirement shall be part of the document control process as described in Part 2 para 28. The OM and the TRM shall comply with the format, the identification, the validation, the distribution and any additional requirements established in the OMM for each manual.
63	ORA.ATO.130 (b)		x/p	x/p	x/p	The OMM shall contain a description of related management process/procedures to meet the requirement. This requirement shall be part of the document control process as

						described in Part 2 para 28. The OM and the TRM shall comply with the format, the identification, the validation, the distribution and any additional requirements established in the OMM for each manual.
64	ORA.ATO.130 (c)				x		The cross reference table referred to in the note of item 1 related to ORA.GEN.115 (b) shall include all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO. A separate cross reference table including all applicable Part-FCL/Part-21 and related AMC/GM relevant to the scope of approval of the ATO is acceptable if it is clearly identified as part of the organisation's documentation system
65	ORA.ATO.130 (d)				x		Description of related process/procedures to meet the requirement Note: Before entry into force of Part ORO, Regulation (EC) No 859/2008 of 20 August 2008 applies (particularly subpart Q) An ATO is expected to develop procedures and implement processes related to fatigue management based on the principles of safety management so that the risks associated with fatigue of trainees and/or instructors do not negatively impact flight safety during training or result in training deficiencies creating latent conditions with the potential to breach aviation system defences (well after the pilot has finished his training). ICAO Doc 9966 provides guidance for the implementation of Fatigue Risk Management Systems and may be used to adapt the system to the size and complexity of the ATO.
66	ORA.ATO.135 (a)			x/or	x/or	x/or	See note for ORA.ATO.105 (a)(1)(v) The process ensuring and maintaining adequacy shall be described, implemented and monitored
67	ORA.ATO.135 (b)(1)					x	
68	ORA.ATO.135 (b)(2)					x	See note for ORA.ATO.125 (b)
69	ORA.ATO.135 (b)(3)			x/or	x/or	x/or	See note for ORA.ATO.105 (a)(1)(vi) The process ensuring and maintaining adequacy shall be described, implemented and monitored
70	ORA.ATO.135 (b)(4)			x/or	x/or	x/or	See note for ORA.ATO.105 (a)(1)(vi)

						The process ensuring and maintaining adequacy shall be described, implemented and monitored
71	ORA.ATO.135 (c)				x	Description of related process/procedures to meet the requirement
72	ORA.ATO.135 (d)				x	Description of related process/procedures to meet the requirement
73	ORA.ATO.140		x/p	x/p		See note for ORA.ATO.105 (a)(1)(iv) The operational information and procedure shall be described in the OM The process ensuring and maintaining adequacy shall be described in the OMM, implemented and monitored
74	ORA.ATO.145 (a)				x	See note for ORA.ATO.125 (b) The process ensuring and maintaining compliance with the requirement shall be described, implemented and monitored
75	ORA.ATO.145 (b)				x	See note for ORA.ATO.125 (b) The process ensuring and maintaining compliance with the requirement shall be described, implemented and monitored
76	ORA.ATO.150 (a)				x	See note for ORA.ATO.125 (a)
77	ORA.ATO.150 (b)				x	this information shall also be provided to trainees
78	ORA.ATO.210 (a)		x			See note for ORA.ATO.105 (a)(1)(iii)
79	ORA.ATO.210 (b)		x/p		x/p	See note for ORA.ATO.105 (a)(1)(iii)
80	ORA.ATO.210 (c)		x/p		x/p	See note for ORA.ATO.105 (a)(1)(iii)
81	ORA.ATO.225 (a)				x	See note for ORA.ATO.125 (a)
82	ORA.ATO.225 (b)				x	See note for ORA.ATO.125 (a)

83	ORA.ATO.230 (a)				x	See note for ORA.ATO.125 (a)
84	ORA.ATO.230 (b)			x		See note for ORA.ATO.130 (b)
85	ORA.ATO.300 (a)				x	
86	ORA.ATO.300 (b)				x	
87	ORA.ATO.300 (c)				x	
88	ORA.ATO.305 (a)				x	
89	ORA.ATO.305 (b)				x	
90	ORA.ATO.305 (c)				x	
91	ORA.ATO.310			x		
92	ORA.ATO.330 (a)				x	Commercial air transport operators shall hold an AOC
93	ORA.ATO.330 (b)				x	
94	ORA.ATO.330 (c)				x	
95	ORA.ATO.335 (a)			x		
96	ORA.ATO.335 (b)			x		
97	ORA.ATO.350				x	Commercial air transport operators shall hold an AOC
98	ORA.ATO.355 (a)(1)				x	See note or ORA.ATO.125 (b)
99	ORA.ATO.355 (a)(2)				x	
100	ORA.ATO.355 (b)				x	

x:

x/p:

x/or:

Appendix G

Submission of ATO Manuals

The initial issue of a proposed new Manual, regardless of whether it is in relation to an application for ATO approval or by an ATO holding approval, should, wherever possible, be in a paper copy format. Once approved an electronic copy should be submitted in a single pdf Microsoft Word file for inclusion in the electronic document library. Subsequent amended submissions should be forwarded by submission of the complete manual in a single file with the changes identified. The procedures for submission of an amended manual are as follows:

For the assessment of:

- Manuals that were returned to the ATO by the Authority for amendment and therefore require further review prior to initial Acceptance.
- Manuals that now include information previously stated on the FTO/TRTO Approval Certificate.
- Manuals which incorporate a change (or changes) where the publications were previously accepted by the Authority.

The Manual must be submitted in a format that allows easy identification as to the changes and, therefore, the benefit of an expeditious turnaround time for the ATO.

There is a mandatory requirement for the amended Manual to contain a 'List of Effective Pages' (LOEP). This should identify the page number plus the relevant implementation date. Therefore, the date of a page will change each time that particular page is amended. This is then referenced additionally in the LOEP to ensure robust and effective document control.

It is also accepted as best practice that a vertical line is added adjacent to the actual amendment(s).

All submissions should be accompanied by notification of the reason for submission the following template should be used for that purpose. Following review of the manual the template will be returned to the ATO as a record of the acceptance of the submission; a report detailing required corrective action will be sent in the case of rejected manuals.

MANUAL AMENDMENT NOTIFICATION

Organisation Name: …………………………………………………………...

Manual Title: ………………………………………………………………

Amendment/Version/Issue Number: ……………………………

Issue Date : ………………………….

Tick as Required

Manual returned by the Authority and requires prior initial Acceptance	
Manual now includes information previously stated on the FTO/TRTO Approval Certificate.	
Manual incorporates a change (or changes) where the previous publication was accepted by the Authority.	
Manual now includes an accepted change	

General Overview of Amendments:

CAA Use

Manual Revision received and accepted/ not accepted *(delete as appropriate).*

Name: …………………………………………

Signature: …………………………………….

Date: ……………………………………………..

Return by fax or e mail to ATO

Appendix H

①

CAA Document Control
Generic Quality Manual ②

Copy No 1 of 4 ③

Contents ④

Record of Amendments ⑤

Amendment No	Section affected	Brief detail of change	Date issued	Incorporated by (signature)	Date

Proposal for Amendment ⑥

Amendment proposed (section affected)	Reason for Amendment	Proposed by (Name & Initials)	Date

Distribution List ⑦

COPY NUMBER	HOLDER
1 Hard copy/CD	Accountable Manager
2 Hard Copy/CD	Quality Manager
3 Hard Copy/CD	Head of Training/CFI
4 Electronic/CD	Civil Aviation Authority

List of Effective Pages ⑧

Page	Date	Initials
Page 2	19.4.2011	SL
Page 3	20.8.2011	SL
Page 4	20.8.2011	SL
Page 5	20.8.2011	SL
Page 6	20.8.2011	SL
Page 7	20.8.2011	SL
Page 9	20.8.2011	SL
Page 10	20.8.2011	SL
Page 11	20.8.2011	SL
Page 13	20.8.2011	SL
Page 14	20.7.2011	SL
Page 15	20.8.2011	SL
Page 16	20.8.2011	SL
Page 17	20.8.2011	SL
Page 18	20.8.2011	SL
Page 19	19.4.2011	SL
Page 20	20.8.2011	SL
Page 21	20.8.2011	SL
Page 22	20.8.2011	SL
Page 23	20.8.2011	SL

⑨

Key to the Document Control Guide

1. As a header (or footer) the ATO name, title of manual, version (and possibly amendment number) and date. This may differ from page to page as amendments are added but must correspond with the relevant page in the List of Effective Pages.

2. Main Title of manual (in this case Quality Manual) – usually the legal entity of the organisation is given here too (in this case, CAA).

3. Copy (which controlled copy) of however many controlled copies are in the Distribution List. *As an example, in this case Copy no 1 is held by the CAA.*

4. Contents index *(in this case, all the contents that one would wish to see as part of a quality manual are shown).* NB This is not the same as a List of Effective Pages as no dates or signatures are involved.

5. Record of Amendments – it is vital to accurately record all amendments added to a manual.

6. Proposal for Amendment – this form is extremely useful if an anomaly is spotted, or legislation has changed and part (or parts) of the manual needs to change with it, and there is not enough time to make changes there and then.

7. The Distribution List – this gives the precise number of controlled copies that must be kept track of and periodically updated; and who 'owns' them. It is the responsibility of the ATO to ensure that major updates are notified to the CAA and approved before they go into circulation and use.

8. List of Effective Pages – here, each page is listed individually with the date and initials of whosoever is responsible for the updating of the manual. The more amendments there are, the more dates change *(in this case see how pages 2, 14 and 19 are from earlier versions).*

9. The page numbers *must* tally with both the Contents index and the List of Effective Pages.