**ORGANISATION MANAGEMENT MANUAL (OMM) Guidance**

|  |  |
| --- | --- |
| **Scope** | **Operations Management Manual (OMM) published as a template in Word format, based on ORA.ATO.200.** |
| **Who is concerned** | **Training organisations wishing to establish a manual system in order to become an Approved Training Organisation (ATO).** |
| **Valid from** | **08.09.2023** |
| **Purpose** | **The purpose of this template is to assist an Approved Training Organisation (ATO) with guidance/information to compile their manual system. It covers the major aspects of the required structure and content of an Organisation Management Manual (OMM) and has been developed on the basis of the CAAT.** |

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| --- | --- |
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| **Registration No** |  |
| **Prepared by** | **PEL/TO** |
| **Released by** | **PEL Manager** |
| **Distribution**  | **Internal/External**  |

**Completion guidance**

**The information provided solely represent a possible means of how to provide the required information. An organisation must add further information or adapt the template to their specific needs.**

**The first page of this Word template is to be deleted by the organisation when adapting this template.**

**Text shown in *blue* *italic* indicates where the organisation needs to provide its own specific information or data.**

**In addition, all references to manuals, chapters and sub-chapters are shown in blue and are to be verified to ensure compliance with the ATO specific and own documentation.**

*Cover Page*

ATO’S LOGO

**ATO’S NAME**

**ORGANISATION MANAGEMENTMANUAL (OMM)**

**ISSUE NO. XX/REVISION NO. XX**

**APPROVED BY**

 *CAAT’S STAMP*

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**(NAME OF CAAT-DG)**

**DATE of APPROVAL**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Volume no….**

***Second page***

ATO’S LOGO

**ATO’S NAME**

**ORGANISATION MANAGEMENT MANAUL**

ISSUE NO. XX/REVISION NO. XX

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| **Prepared by** | Compliance Officer | *Original Signature* | DD MMM YYYY |
| **Reviewed by** | CMM | *Original Signature* |  |
| **Accepted by** | Accountable Manager | *Original Signature* |  |

**LIST OF EFFECTIVE PAGES**

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| **Page** | **Rev.** | **Issue Date** | **Page** | **Rev.** |
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CAAT’s Stamp

**DISTRIBUTION LIST**

|  |  |  |  |
| --- | --- | --- | --- |
| **Volume** | **Holder** | **Type** | **Location** |
| 01 | CAAT | Hard CopyElectronic File | PEL Office |
| 02 | Accountable Manager |  |  |
| 09 | Library |  | Library |

This document should be made available to all personnel involved in the Approved Training Organisation. This does not mean that all personnel have to be in receipt of a manual but key personnel should have reasonable access to one. The following is a typical list of those who require access to the documents and is for *guidance only.*

*01 – CAAT*

*02 – Accountable Manager*

*03 – CMM*

*04 – Safety Manager*

*05 – Head of Training*

*06 – Chief Flight Instructor (if any)*

*07 – Chief Theoretical Knowledge Instructor (if any)*

*08 – Maintenance Manager*

*09 – Administration*

*10 – Library*

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# List of Abbreviations

**The following abbreviations are used within this manual:**

| Abbreviation | Definition |
| --- | --- |
| (A) | Aeroplane |
| ACM | Accountable Manager |
| AFM | Aircraft Flight Manual |
| AIP | Aeronautical Information Publication |
| ALARP | As Low As Reasonably Achievable |
| AMoC | Alternative Means of Compliance |
| AMC | Acceptable Means of Compliance |
| ANS | Air Navigation Services |
| APP | Appendices |
| ATM | Air Traffic Management |
| ATO | Approved Training Organisation |
| ATT | Attachment |
| CAAT | The Civil Aviation Authority of Thailand |
| CAM | Continuing Airworthiness Manager |
| CAME | Continuing Airworthiness Management Exposition |
| CMM | Compliance Monitoring Manager |
| CV | Curriculum Vitae |
| e.g. | for example, |
| EDP | Electronic Data Processing |
| ERP | Emergency Response Plan |
| etc. | Etcetera |
| FCL | Flight Crew Licence |
| GEN | General |
| GM | Guidance Material |
| HT | Head of Training |
| ICAO | International Civil Aviation Organisation |
| i.e. | id est |
| IT | Information Technology |
| MS | Management System |
| NMR | Notification of Manual Revision |
| No. | Number |
| OM | Operations Manual |
| OMM | Organisation’s Management Manual |
| ORA | Organisation Requirements Air Crew |
| P x S = R | Risk-**P**robability x Risk-**S**everity = **R**isk-Score |
| PART M | Part Maintenance |
| POH | Pilot’s Operating Handbook |
| PRA | Proposed Revision Amendment |
| REV | Revision |
| SM | Safety Manager |
| TBD | To Be Defined |
| TM | Training Manual |
| VFR | Visual Flight Rules |
| X-check | Cross Check |
|  |  |
|  |  |
|  |  |
|  |  |

# The Organisation and Scope of Activity

## Safety Policy

* be endorsed by the accountable manager;
* be communicated, with visible endorsement, throughout the organisation; and
* reflect organisational commitments regarding safety and its proactive and systematic management;
* include safety reporting principles.
* should include the Just Culture principles and encourage people to report safety issues and concerns. This should explain the line between acceptable and unacceptable behaviours of staff and how they will be treated fairly when involved in occurrences or when reporting safety issues and concerns.
* To reflect the organization’s commitment to safety, the safety policy should include a commitment to:

a) continuously improve the level of safety performance;

b) promote and maintain a positive safety culture within the organization;

c) comply with all applicable regulatory requirements;

d) provide the necessary resources to deliver a safe product or service;

e) ensure safety is a primary responsibility of all managers; and

f) ensure it is understood, implemented and maintained at all levels.

* …..

## The Organisation – Vision, Mission, Values and Strategy

* we provide a wide frame of aviation training courses which include the initial assessments of professional aviation personnel;
* we strive for highest standards in aviation training; and
* focus on professional, honest and friendly relationship with customers and ensure confidentiality at all times.
* …

## Introduction

This Approved Training Organisation Management Manual (ATO-OMM) for *ATO Name* takes into account all aspects of the organisation, such as philosophies, policies, processes, guidelines and responsibilities and includes Safety and Compliance Management.

It has been developed with considerations to the CAAT Regulation and relevant Acceptable Means of Compliance (AMC) and Guidance Material (GM). Refer to OMM, Chapter 1.6 «Relevant Standards and Requirements».

## Scope of Activity – ATO Certificate

Refer to Training Manual (TM), List of Appendices, Subchapter «List of effective syllabi» for the list of training courses provided.

*The training provided can be made available to the general public or be limited to trainees only.*

## Statement of Complexity

The *ATO Name* is to be considered as *non-complex* or *complex* organisation.

## Relevant Standards and Requirements

The ATO ensures compliance with the following legal requirements (including their amendments):

* Thailand Air Navigation Act, B.E. 2497;
* Regulation of the Civil Aviation Board No.89;
* Cover Regulation to TCAR PEL;
* Thailand Civil Aviation Regulation (TCAR) PEL Part FCL, Part ORA,;
* Relevant part of TCAR OPS;
* The Civil Aviation Authority of Thailand Requirement No.22/2562;
* The Civil Aviation Authority of Thailand Requirement No.32/2562;
* *…*

## Compliance Statement

The undersigned declares:

* that our organisation’s documentation (Management System) has been established and will be maintained in full compliance with the provisions of the legal requirements as stated in OMM Chapter 1.6 «Relevant Standards and Requirements» and that it complies with the terms and conditions of the company’s Approval(s) and Certificate(s);
* to be responsible for the content of the Management System and confirms, that besides the requirements stated in OMM Chapter 1.6 «Relevant Standards and Requirements» all relevant national rules and regulations as well as ICAO standards and procedures are reflected in the different chapters;
* to be familiar with and to understand the content and meaning of the Management System and that all duties will be performed in full accordance with it;
* that the detailed knowledge of the relevant content is mandatory to all personnel concerned and that we commit to make sure that they comply with the instructions given in the Management System; and
* to be aware of the fact, that CAAT does not approve/accept the organisation’s documentation as such, but only specific elements thereof, as indicated on the respective compliance list. The responsibility for the completeness and the correctness of the organisation’s documentation remains therefore solely with the organisation.

## Alternative Means of Compliance

Instead of Acceptable Means of Compliance (AMC), Alternative Means of Compliance (AMoC) may be established to ensure compliance with the Implementing Rules, provided the same level of safety is ensured. If the organisation intends to use Alternative Means of Compliance, the following provisions apply:

* The equivalent level of safety as the one established by the Acceptable Means of Compliance (AMC) adopted by the CAAT must be reached;
* The organisation must not implement Alternative Means of Compliance without having received the formal approval;
* CAAT may stipulate conditions under which the organisation may process the work during the implementation of an Alternative Means of Compliance;
* Formal approval will be granted on specific documentation issued by CAAT and become effective only after the organisation has received the respective documentation; and
* The submission to CAAT must include:
1. A written application;
2. A full description of the Alternative Means of Compliance;
3. The proposed revision/amendment of the manual system reflecting the application of the Alternative Means of Compliance; and
4. A documented assessment, demonstrating that Regulation and its Implementing Rules are met. In order to demonstrate that the Implementing Rules are met, the assessment shall include a documented risk-assessment. The result of this risk-assessment should demonstrate that an equivalent level of safety as the one established by the Acceptable Means of Compliance (AMC) adopted by the CAAT is reached.

### List of approved Alternative Means of Compliance

The organisation uses the following approved Alternative Means of Compliances:

|  |  |  |  |
| --- | --- | --- | --- |
| Legal Reference | Short Description | Date of Approval | Reference |
| … |  |  |  |

## Location, Facilities and Infrastructure

|  |  |  |  |
| --- | --- | --- | --- |
| Address | … | 🕿 | +66 … |
| 🖷 | +66 … |
| 🖳 | email@ATO.com |

The following facilities and infrastructure are available at ATO Name:

Describe the facilities provided to support activities in compliance with TCARs.

## Access and Power of Authorities

* For the purpose of determining compliance with the relevant requirements of CAAT and its Implementing Rules, the organisation shall grant access to any facility, aircraft, document, records, data, procedures or any other material relevant to its activity subject to certification, whether it is contracted or not, to any person authorised by the Civil Aviation Authority of Thailand (CAAT).
* Any person authorised by the Civil Aviation Authority of Thailand (CAAT) is permitted to board and fly in any aeroplane operated in accordance with the ATO at any time, and to enter and remain on the flight deck.

# Organisation Documentation, System of Amendment and Revision

## Overview of the Organisation Documentation

|  |  |  |
| --- | --- | --- |
| OMM | Organisation Management Manual | The Approved Training Organisation’s Management Manual includes the Safety Management and the Compliance Management, and documents for all superior aspects of the organisation such as philosophies, policies, processes, guidelines and responsibilities. |
| OM | Operations Manual | These manuals provide relevant information to particular groups of individuals, such as flight instructors, ground instructors, students and include general, technical, route and staff training information. |
| TM | Training Manual | These manuals state the standards, objectives and training goals for each phase of training that the students are required to comply with and address the following subjects:- training plan- theoretical knowledge training- flight instruction- simulator instruction (if applicable) |

### Common Language

Management System related documentation and manuals are issued in English. In addition, any Non- Approved Training Organisation Certificate or CAAT related documents, manuals, working tools and forms may be issued in, or translated into, another language if and when required. The first choice of language for all verbal communication is *English/Thai.* An alternative choice of language may be used, provided all parties are in agreement.

## System of Amendment and Revision

### Responsibility Matrix

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Document | Owner | Content | Format | Content Owner |
| ACM | CMM | SM | HT |  |
| ATO-OMM | ACM | Safety Management | EDP/ Text –Paper |  |  | X |  |  |
| Safety Policy and Vision | EDP/ Text –Paper | X |  |  |  |  |
| Compliance Monitoring | EDP/ Text –Paper |  | X |  |  |  |
| Occurrence Reporting | EDP/ Text –Paper |  |  |  | X |  |
| Management System Training | EDP/ Text –Paper |  |  | X |  |  |
|  |  | Security Training |  |  |  | X |  |  |
|  |  | … |  |  |  |  |  |  |
| ATO-OM | *HT* | General | EDP/ Text –Paper | X |  |  |  |  |
|  |  | Technical | EDP/ Text –Paper |  |  |  | X |  |
|  |  | Standard Operating Procedures | EDP/ Text –Paper |  | X |  |  |  |
|  |  | Route and Aerodrome | EDP/ Text –Paper |  |  |  | X |  |
|  |  | Instructor Training | EDP/ Text –Paper |  |  |  | X |  |
|  |  | … |  |  |  |  |  |  |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| ATO-TM | *HT* | Syllabi | EDP/ Text –Paper |  |  |  | X |  |
| … |  |  |  |  |  |  |  |  |

### Revision / Amendment Process

| Step | Remarks | Tool | Responsibility |
| --- | --- | --- | --- |
| Monitoring and Change Identification | * Collection of suggestions and discrepancies
* Findings, corrective and preventive actions
* Changes in relevant standards and Requirements
* Change Management
 | * Rules and regulations
* Audit and Inspection Schedule, Checklist and Report
* Analysis/Report Form
 | Document Owner |
| Identification of elements **requiring** prior approval or **not requiring** approval | * Identify elements requiring prior approval/acceptance
* Select administrative requirements for submission accordingly
* Ensure Compliance Check prior to CAAT submission
 | * List of Acceptances and Approvals or Compliance List
 | Document Owner |
| Change Initialisation | * Identify/define type of change: revision or new issue?
 |  | Document Owner |
| Elements requiring prior approval | * Identify elements requiring prior approval
* Verify administrative requirements
 | * List of Elements requiring prior Approval, OMM Chapter 2.4.1 «List of Elements requiring prior Approval»
 | Document Owner |
| Establish draft of revision/amendment | * Edit and establish change
* Mark any changes to previous version by a vertical line on the border of the page
* Eliminate change indicators from the previous revision of that page
 | * ATO-OMM
 | Document Owner |
| Compliance check | * Verify compliance, compatibility and completeness with standards, requirements and regulations, harmonisation with other documents, viability & appropriateness
* Conduct assessment of risks, if required
* Verify the requirement of a detailed audit
* Ensure traceability of changes
* Check completeness
 | * Relevant Requirements and Standards
* Risk Assessment in case of Flexibility Provisions or Alternative Means of Compliance (AMoC)
 | CMMDocument Owner  |
| CAAT Submission with elements **requiring** prior approval | * Prepare submission in accordance with the administrative requirement
* changes requiring prior approval/acceptance:

submit revised pages as draft at least 30 days before the date of the intended changes* in case of planned change of a nominated person: inform CAAT at least 10 days before the date of the proposed change
* in case of unforeseen changes: inform CAAT at the earliest opportunity
 | * CAAT administrative requirements:

Compliance ListProposed revision/ amendment/manual/document* For nominated persons:

Form * In Case of flexibility provisions/alternative means of compliance:

ApplicationFull description proposed revision amendment including documented assessment demonstrating compliance | Nominated Person of the department/Division |
| CAAT Submission **without** any element requiring prior approval | * Prepare submission in accordance with the administrative requirements
* Confirm that no elements requiring prior approval are included
* submit revised pages at least 30 days before the date of the intended changes
* in case of unforeseen changes: inform CAAT at the earliest opportunity
 | * CAAT administrative requirements:
* Compliance List
* revised/amended/ manual/document/pages

… | Nominated Person of the department/Division |
| Document Evaluation | * Apply corrective actions
* Agree implementation or conditions with CAAT
* Implement CAAT prescribed conditions under which the organisation may process work during the implementation
* Agree effective date with CAAT
 | * Document Evaluation Report
* Emails
* Phone
 | Document OwnerCAAT |
| Distribution | * If approval or acceptance by CAAT required, initiate distribution and implementation only after formal approval or approval/acceptance is received by CAAT
* Add effective date
* Complete list of highlights of revision
* Whenever possible update list of alternative means of compliance/flexibility provisions
* distribute new edition/revision/amendment (including CAAT)
* instruct/inform employees
 | * Distribution list, OMM Chapter 2.2 «System and Form of Distribution»”
 | ACM |
| Update document/manual | enter revision/amendment correctly | Revision/Amendment | Document user |

## Changes/Elements requiring Approval

* Any revision/amendment must be submitted to CAAT before any implementation of a change takes place;
* The amendment/revision process includes the identification of elements requiring approval. Changes requiring prior approval may only be implemented by the organisation upon receipt of formal approval by the competent authority;
* The application for the amendment of a certificate should be submitted at least 30 days before the date of the intended changes; and
* In the case of a planned change of a nominated person, the organisation should inform CAAT at least 10 days before the date of the proposed change.

### List of Elements requiring prior Approval

For a list of elements requiring prior approval, refer to «ATO Compliance List».

## Control of External/Foreign Documents

|  |  |
| --- | --- |
| Step | Remarks |
| 1 | Identification | Identify new issues and changes in external documents External documents are established and amended by third parties (e.g. law, international standards, etc.). They have an impact on the organisation’s activities. The amendment process shall ensure that new issues and revisions of foreign documents are identified. |
| 2 | Analysis | Verify the impact on the organisation processes |
| 3 | Amendment | Trigger the amendment of the organisation processes and documentation |
| 4 | Archive | Ensure that old versions of documents are stored to ensure traceability |

| Reference  | Subject | Responsible |
| --- | --- | --- |
| Basic Regulation | Common rules in the field of civil aviation authority. | ACM |
| Commission Regulations | Technical requirements and administrative procedures related to regulation aircrew and air operations including Acceptable Means of Compliance (AMC) and Guidance Material (GM) | HT |
| Civil Aviation Authority of Thailand | Work instructions, terms of reference | HT |
| AIP (VFR) | Information for safe aviation operations | HT |
| Aircraft Flight Manual (AFM)/Pilot’s Operating Handbook (POH) |  |  |
| Aeroplane operational description | HT |
| … | … | … |

# Organisational Structure, Duties, Responsibilities and Accountabilities

## Organisational Structure

Insert the graphical presentation of the structure of the Approved Training Organisation. The organisation’s subordination and reporting lines shall clearly show the relationship between divisions, departments and functions defined and shall represent the organisation as a whole. To ease revision processes complete details of management personnel should be noted in a table as shown under 3.2

## Management Personnel – Name and Contacts

| Function | Name of Function Holder  | Contact details |
| --- | --- | --- |
| Accountable Manager | … | AddressCityPhone:Email: |
| Compliance Monitoring Manager  |  |  |
| Safety Manager |  |  |
| Head of Training |  |  |
|  |  |  |
| … |  |  |

## Duties, Responsibilities and Accountabilities

### Accountable Manager (ACM)

The accountability, responsibilities and duties of the Accountable Manager are:

* The duty to endorse the safety policy;
* The responsibility of establishing and maintaining an effective Management System;
* The authority to ensure that all activities can be financed and carried out in accordance with the applicable requirements;
* The authority to designate the Compliance Monitoring Manager;
* The duty to grant direct access to nominated persons and the Compliance Monitoring Manager;
* The duty to ensure that sufficient resources are allocated, taking into account the size of the organisation and the nature and complexity of its activities.
* Ensuring that the personnel continually promotes the Safety Policy and demonstrates their commitment to it;

### Safety Manager (SM)

* The Safety Manager acts as the CAAT point and is responsible for the development, administration and maintenance of an effective Safety Management System.
* The functions of the Safety Manager are:
* facilitating hazard identification, risk analysis and management;
* monitoring the implementation of actions taken to mitigate risks, as listed in the safety action plan;
* providing periodic reports on safety performance;
* ensuring maintenance of safety management documentation;
* ensuring that there is safety management training available and that it meets acceptable standards;
* providing advice on safety matters; and
* ensuring initiation and follow-up of internal occurrence/accident investigations;

### Compliance Monitoring Manager (CMM)

* The responsibilities, duties and competences of the Compliance Monitoring Manager include:
* ensuring that the activities of the organisation are monitored for compliance with the applicable regulatory requirements and standards, as well as any additional requirements as established by the organisation;
* ensuring that these activities are being carried out properly under the supervision of the relevant head of the respective functional area;
* responsibility to ensure that the Compliance Monitoring Programme is properly implemented, maintained, continually reviewed and improved;
* performing of audits and inspections, provided the corresponding competence in the area of audits/inspections to be conducted are existent. One or more auditors may be appointed by choosing persons having the appropriate competences either from within or outside the organisation, assuring their independence.
* direct accessibility to the Accountable Manager;
* ability to demonstrate relevant knowledge, background and appropriate experience related to the activities of the organisation, including knowledge and experience in compliance monitoring; and
* accessibility to all parts of the organisation, and if necessary, any contracted organisation.

### Head of Training (HT)

* manages and supervises the progress and completion of training within the organisation;
* is subordinated to and reports to the Accountable Manager; and
* the accountability, duties and responsibilities shall include that the Head of Training:
* ensures that the training is in compliance with the appropriate requirements, mainly Part-FCL, Part-NCO, Part-NCC and internal requirements;
* ensures satisfactory integration of flight training in an aircraft, training in a flight simulation training device (FSTD) and the theoretical knowledge instruction;
* develops, implements and improves the training programme, syllabi and session plans, including training publications, documents and records;
* ensures the correct and adequate content of the organisation’s documentation in the area of responsibility;
* supervises the student’s overall progress and completion of training;
* assures the appropriate use of infrastructure, training facilities, equipment and tools;
* is responsible for the processing, storing and filling of all documents and records according to the provisions of the management system;
* records and analyses any occurrences and deviations from the standards and ensures corrective and preventive action within the organisation;
* promotes corporate culture of safety and compliance;
* represents the ATO and liaises with CAAT regarding administration and coordination; and
* manages and plans continuous education and career development of subordinates.
* executes power and authority:
* selects and nominates subordinates;
* defines action to be taken if subordinates do not achieve or maintain the required standards of performance and/or associated behaviour;
* defines disciplinary actions in case of student’s inadmissible behaviour,
* has the authority to implement corrective action within the designated department.

# Safety Management

## Safety Policy

Refer to OMM Chapter 1.1 «Safety Policy»

## Hazard Identification and Risk Management

The hazard identification process is the formal means of collecting, evaluating and recording hazards, evaluate the associated risk and define related mitigation measures.

Definition of hazard and risk:

Hazard: Condition or object with the potential of causing injuries to people, damage to equipment or structures, loss of material, or reduction of ability to perform a stipulated function.

Risk: The assessment, expressed in terms of predicted probability and severity, of the consequence(s) of a hazard, taking as reference the worst foreseeable situation.

Starting with the Hazard Identification Process and the associated tables, the hazard identification and the associated risk assessment can be performed.

### Hazard Identification Process

|  |  |  |
| --- | --- | --- |
| Step | Tool | Responsibility |
| Identify hazard |  | All personnel |
| Inform Safety Manager | Hazard reporting FormVerbally during weekly Briefing | All personnel |
| Evaluate associated risk | Table for probability, severity, tolerability Matrix and Risk Assessment Checklist | SM |
| Define mitigation action | Risk Assessment Checklist | SM |
| Filing |  | SM |
| Inform Head of ATO | Written report | SM |
| Set duties on task list | Task list | ACM |
| Controlling | Internal Audit | CMM |

**Sources for hazard identification**

**There are a variety of sources for hazard identification, internal or external to the organization. Some internal sources include:**

**a) Normal operations monitoring; this uses observational techniques to monitor the day-to-day operations and activities such as line operations safety audit (LOSA).**

1. **Automated monitoring systems; this uses automated recording systems to monitor parameters that can be analysed such as flight data monitoring (FDM).**

**c) Voluntary and mandatory safety reporting systems; this provides everyone, including staff from external organizations, with opportunities to report hazards and other safety issues to the organization.**

**d) Audits; these can be used to identify hazards in the task or process being audited. These should also** **be coordinated with organizational changes to identify hazards related to the implementation of the change.**

**e) Feedback from training; training that is interactive (two way) can facilitate identification of new hazards from participants.**

**f) Service provider safety investigations; hazards identified in internal safety investigation and follow-up reports on accidents/incidents**

**Examples of external sources for hazard identification include:**

**a) Aviation accident reports; reviewing accident reports; this may be related to accidents in the same State or to a similar aircraft type, region or operational environment.**

**b) State mandatory and voluntary safety reporting systems; some States provide summaries of the safety reports received from service providers.**

**c) State oversight audits and third-party audits; external audits can sometimes identify hazards. These may be documented as an unidentified hazard or captured less obviously within an audit finding.**

**d) Trade associations and information exchange systems; many trade associations and industry groups are able to share safety data that may include identified hazards.**

### Hazard Reporting Form

Individuals can make a report on any safety related issues, accidents or incidents.

* Refer to feedback and reporting system OMM Chapter 7.2.3 «Reporting Form»; or
* Refer to Attachment ATT6A «Reporting-Analysis Form».

**4.2.2.1 Non-Punitive reporting Policy (Just Culture)**

Safe flight operations are the ATO’s most important commitment. To ensure that this commitment is met, it is imperative to have uninhibited reporting of all incidents and occurrences that might compromise safety. Whilst negligence or deliberate violation of the rules is unacceptable, it is recognised that people make mistakes, and therefore systems must be designed to allow for error tolerances.

### Probability Table

The probability of an individual risk will be determined by taking into account any mitigation measures that may already be in place. Determination of probability is not an exact science but relies on a logical, common-sense analysis of the risk, in order to arrive at a reasonable answer.

Risk probability is to be defined in accordance with the following table:

|  |  |  |
| --- | --- | --- |
| ProbabilityClassification | Definition | Probability per year |
| Frequent5 | * An event will almost certainly occur.
 | > 75% |
| Probable4 | * An event is likely to happen.
 | > 50% |
| Occasional3 | * An event will probably occur sometime.
 | < 50% |
| Remote2 | * An event is unlikely to occur, but is possible.
 | ~ 25% |
| Improbable1 | * An event is highly unlikely to occur.
 | < 5% |

### Severity Classification Table

The severity of risk will be determined by taking into account any mitigation measures that may already be in place. Severity should be assessed in terms of the worst possible realistic scenario.

Risk severity should be defined in accordance with the following table.

|  |  |
| --- | --- |
| Severity Classification | Severity Indicators |
| Level of damage | Level of injury | Safety Barriers(e.g. Emergency procedures, technical systems) | Operational/Human Factors |
| Catastrophic5 | * Loss of Aircraft
* Equipment destroyed
 | * Multiple fatalities
 | * No safety barriers remaining
 | * Complete reduction of operational capability
* Complete loss of control
* Outcome is not under control
* Operator is unable to avoid accident
 |
| Hazardous4 | * Substantial aircraft or equipment damage
 | * Fatal or serious injuries to a number of people
 | * None or very few safety barriers remaining
 | * Large reduction of operational capability
* Physical distress
* Excessive workload such that operators cannot be
* relied upon to perform required tasks accurately or completely
 |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Major3 | * Minor damage to aircraft or equipment
 | * Individual serious injuries but no fatalities
 | * Several safety barriers remaining
 | * A significant reduction in the capability of the
* operators to cope with adverse operating condition
* Significant increase in operator workload, and
* significant concern over the consequences of failure
* Conditions impairing operator efficiency or creating
* Significant discomfort
* Physical distress to passengers and operators
 |
| Minor2 | * Insignificant damage to aircraft or equipment
 | * Individual minor injuries
 | * Multiple safety barriers remaining alternate/emergency procedures are able to compensate for functional loss/nuisance
 | * Actions required by operators are well within their capabilities but cause slightly increased
* workload/operation limitations/loss of efficiency
* some physical discomfort to passengers (not to operators)
* Nuisance
 |
| No Significant Safety Effect 1 | * No damage to aircraft or equipment
 | * No injury
 | * Existing safety barriers come into play to avoid the event turning into a minor incident
 | * Nuisance/Failure can be eliminated by routine action, or
* does not require action at all
 |

### Tolerability Matrix

When severity and probability have been defined, the tolerability of the risk can be determined. Tolerability is defined as either acceptable, to be reviewed or unacceptable, allowing a suitable risk mitigation strategy to be developed if required.

Definitions of tolerability levels are as follows:

|  |  |
| --- | --- |
| Classification | Definition |
| Unacceptable | A risk falling into this category is regarded as unacceptable whatever the level of benefits associated with the activity. Any activity or practice-giving rise to risks falling into this category would, as a matter of principle, be ruled out, unless the activity or practice can be modified to reduce the degree of risk, so that it falls into one of the classifications mentioned below, or there are exceptional reasons for the activity or practice to be retained. |
| Tolerable | Risks in this category are typical of the risks from activities that people are prepared to tolerate in order to secure benefits, in the expectation that:* the nature and level of the risks are accurately assessed and the results used properly to determine control measures. The assessment of the risks needs to be based on the best available scientific evidence and, where evidence is lacking, on the best available scientific advice;
* the residual risks are not unduly high and are kept as low as reasonably practicable (the ALARP principle); and
* the risks are periodically reviewed to ensure that they still meet the ALARP criteria, for example, by ascertaining whether further or new control measures need to be introduced to take into account changes over time, such as new knowledge about the risk or the availability of new techniques in order to reduce or eliminate risks.
 |
| Broadly acceptable  | Risks falling into this category are generally regarded as insignificant and adequately controlled. The levels of risk characterising this category are comparable to those that people regard as insignificant or trivial in their daily lives. They are typical of the risk from activities that are inherently not very hazardous or from hazardous activities that can be, and are, readily controlled to produce very low risks.  |

### Risk Tolerability Matrix

The tolerability of an individual risk is determined by use of the following risk tolerability matrix:

|  |  |
| --- | --- |
| *Risk probability*  | *Risk Severity*  |
| *Catastrophic* | *Hazardous* | *Major* | *Minor* | *No Significant Safety Effect* |
| *5* | *4* | *3* | *2* | *1* |
| *Frequent*  | *5* | *25* | *20* | *15* | *10* | *05* |
| *Occasional* | *4* | *20* | *16* | *12* | *08* | *04* |
| *Remote* | *3* | *15* | *12* | *09* | *06* | *03* |
| *Improbable* | *2* | *10* | *08* | *06* | *04* | *02* |
| *Extremely Improbable* | *1* | *05* | *04* | *03* | *02* | *01* |

### Risk-Assessment Checklist

**Organisational Risks**

1. P = Probability, S = Severity, R = Risk Probability

| Ref | Area | Hazards may stem from  | Risk AssessmentP x S = R | Mitigation Action  | Risk post mitigation  |
| --- | --- | --- | --- | --- | --- |
| P | S | R |  | P | S | R |
| 1 | Organisation – Management | * rapid growth
 | … | … | … | * …
 | … | … | … |
| * recession or financial distress
 |  |  |  |  |  |  |  |
| * limited or lack of management commitment
 |  |  |  |  |  |  |  |
| * the management does not demonstrate support for the activity
 |  |  |  |  |  |  |  |
| * limited or lack of resource availability or planning, including staffing
 |  |  |  |  |  |  |  |
| * lack of or ineffective reporting policy (just culture)
 |  |  |  |  |  |  |  |
| * high ratio of students to FIs
 |  |  |  |  |  |  |  |
| * extensive use of part-time or freelance instructors
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 2 | Contracted activities  | * contractual arrangements not clearly specified
 | … | … | … | * …
 | … | … | … |
| * contracted party not approved
 |  |  |  |  |  |  |  |
| * unforeseen change in provider
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 3 | Personnel requirements  | * unclear reporting lines
 | … | … | … | * …
 | … | … | … |
| * absence of arrangements for deputising in case of planned/unplanned absence
 |  |  |  |  |  |  |  |
| * incorrect or incomplete or lack of training and knowledge transfer
 |  |  |  |  |  |  |  |
| * absence of recurrent training programme
 |  |  |  |  |  |  |  |
| * high rate of turnover
 |  |  |  |  |  |  |  |
| * change of instructor during ongoing training
 |  |  |  |  |  |  |  |
| * lack of or incomplete

duty description |  |  |  |  |  |  |  |
| * lack of, incorrect or incomplete control of necessary certificates of staff (licences, ratings, medical certificates).
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 4 | Facility requirements & equipment  | * facilities shared between different organisations
 | … | … | … | * …
 | … | … | … |
| * facilities exposed to high level of noise, distraction, etc.
 |  |  |  |  |  |  |  |
| * same facilities being used for flight planning and theoretical instruction
 |  |  |  |  |  |  |  |
| * changes, upgrades or new equipment
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 5 | Record keeping  | * unauthorised access
 | … | … | … | * …
 | … | … | … |
| * hardware or software changes
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 6 | Processes & procedures  | * lack of incorrect, incomplete manuals or operating procedures
 | … | … | … | * …
 | … | … | … |
| * lack of incorrect, incomplete or complicated document update
 |  |  |  |  |  |  |  |
| * existence of informal procedures
 |  |  |  |  |  |  |  |
| * language barriers
 |  |  |  |  |  |  |  |
| * difficulties to access procedures
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 7 | Terms of approval and training courses  | * frequent changes
 | … | … | … | * …
 | … | … | … |
| * wide range of different approved training courses
 |  |  |  |  |  |  |  |
| * inadequate supervision of distance learning
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 8 | Human factors  | * combination of positions (workload and stress)
 | … | … | … | * …
 | … | … | … |
| * instructor fatigue
 |  |  |  |  |  |  |  |
| * alcohol and substance abuse
 |  |  |  |  |  |  |  |
| * medications
 |  |  |  |  |  |  |  |
| * complacency
 |  |  |  |  |  |  |  |
| * psycho-social stresses (financial, birth of child, divorce, bereavement, etc.)
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |

**Operational risks**

| Ref | Area | Hazards my stem from  | Risk AssessmentPxS=R | Mitigation Action  | Risk post mitigation  |
| --- | --- | --- | --- | --- | --- |
| P | S | R |  | P | S | R |
| 1 | Pre-flight preparation  | * lack of or poor airworthiness verification
 | … | … | … | * …
 | … | … | … |
| * lack or poor verification of equipment and instruments necessary for a particular training flight
 |  |  |  |  |  |  |  |
| * lack of incorrect or incomplete aircraft performance limitations verification
 |  |  |  |  |  |  |  |
| * lack of incorrect or incomplete flight planning
 |  |  |  |  |  |  |  |
| * poor fuelling processes
 |  |  |  |  |  |  |  |
| * lack of or poor aircraft dispatch or release
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 2 | Aircraft loading  | * improper stowage of carry-on baggage
 | … | … | … | * …
 | … | … | … |
| * improper weight and balance calculations
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 3 | Flight operations  | * use of obsolete documents
 | … | … | … | * …
 | … | … | … |
| * absence of or incorrect flight manuals or charts on board
 |  |  |  |  |  |  |  |
| * improper execution of procedures in all flight phases due to instruction (e.g. stall and spin recovery), including taxiing and parking
 |  |  |  |  |  |  |  |
| * inadequate or complicated procedures
 |  |  |  |  |  |  |  |
| * equipment and instruments necessary for a particular flight or operation not available or malfunctioning
 |  |  |  |  |  |  |  |
| * lack of or poor communication (ATC, dispatch etc.)
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 4 | Special flight operations  | * use of aircraft not equipped/not approved for the particular training flight (e.g. IFR).
 | … | … | … | * …
 | … | … | … |
| * …
 |  |  |  |  |  |  |  |
| 5 | Aerodromes and operating sites  | * use of aerodromes or operating sites with high traffic volumes
 | … | … | … | * …
 | … | … | … |
| * use of uncontrolled aerodromes or operating sites
 |  |  |  |  |  |  |  |
| * taxiway and runway system complexity
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 6 | Refuelling  | * poor refuelling procedures
 | … | … | … | * …
 | … | … | … |
| * improper fuel
 |  |  |  |  |  |  |  |
| * …
 |  |  |  |  |  |  |  |
| 7 | Parking  | * lack of, limited or incorrect type of aircraft parking and tie down procedures
 | … | … | … | * …
 | … | … | … |
| * ..
 |  |  |  |  |  |  |  |

## Change Management

Change Management is a process to manage safety risk related to a change. The related hazards are listed in the table «Hazards Related to Changes» and are rated in the «Risk Assessment Checklist»

Changes that could have a negative impact on safety could stem from:

* implementation of new, or modification of processes/procedures and technology ;
* contracting new providers;
* implementation of new or modification of tools;
* evaluation of new external offices;
* the expansion or contraction of the operation;
* changes in aircraft or equipment;
* economic changes;
* organisational restructuring;
* external regulatory changes; and

any kind of projects with safety relevance.

### Change Management Process

|  |  |  |
| --- | --- | --- |
| Task | Note | Responsible |
| Identify scope of change |  | Responsible Manager(Project Manager) |
| Perform initial impact assessment(refer to table «hazards related to change») | Work-instructionsInfrastructureEquipmentPersonnel | Project Manager with Safety Manager |
| Perform Safety Risk Analyses  | Identify Hazards (refer to Risk Assessment Checklist) add new hazards to the Risk-Assessment Checklist | Project Manager with Safety Manager |
| Define mitigation actions | Preventive barriers  | Safety Manager |
| Identify key personnel  | Key personnel who assist the implementation of the change | Project Manager  |
| Define implementation plan | Timelines  | Project Manager |
| Assess related financial costs | Budgeting | Project Manger |
| Controlling | Check that everything is functioning | Safety Manager |

### Hazard Related to Changes

| Area | Sub-Area | Hazard |
| --- | --- | --- |
|
| Change of Location | Transport  | * Damaging equipment
* Losing important archive files
 |
|  |
| Implementation an introduction of new training aircraft/FSTD | Procedure | * Procedures and checklist not compliant to AFM/POH.
 |
| Training | * Training programme leading to inadequate experience of the aircraft
 |
| Implementation of new training course | Communication | * Insufficient information to the instructors
 |
| Implementation or modification of procedures | Communication | * Insufficient information to the instructors
 |
| Training | * Inadequate training of the instructors
 |
| Quality | * Incorrect application of new procedures
 |
| Contracting of new maintenance provider | Quality | * Erroneous application of applicable standards
 |
| Procedures | * Mix-up of important data
 |
| Change of personnel | Qualification | * Missing review of the experience
* Expired ratings and certificates
* Mix-up of personal data
 |
| Introduction | * Wrong application due to missing and/or incorrect initial training
 |

* For the assessment of the hazards, refer to the «Risk-Assessment Checklist».

### Continuous Improvement

ATO Name will continuously seek to improve its safety performance. Continuous improvement of safety performance will be achieved by:

* proactive and reactive evaluations of facilities, equipment, documentation and procedures through safety audits and inspections;
* proactive evaluation of each individuals performance to verify the fulfilment of their safety responsibilities; and
* through a reactive evaluation in order to verify the effectiveness of the system for control and mitigation of risk.

ATO Name will also continuously seek to improve its safety management processes.

## Safety Promotion

Safety Promotion is a process aimed to promoting a culture of safety by ensuring that, all personnel in an organisation are aware that, at their level and in their day-to-day activity, they are key players in safety and that everyone, therefore, contributes to an effective safety management.

Managers are an important driving force of effective safety management. It is the responsibility of each manager to demonstrate full commitment to safety, to promote safety in everyday activities and to lead by example.

Regular briefings and distribution of specific literature ensures that all personnel are aware of:

* Safety management related activities;
* The conveyance of safety critical information and the reporting of hazards; and
* The importance of procedures.

### List of Safety Communication Tools

|  |  |  |  |
| --- | --- | --- | --- |
| **Tool** | **Information** | **Frequency/Year** | **Responsibility** |
| Instructors’ meeting | New developments | 1/year | HT |
| newsletters, safety bulletins, and notices | safety information | 4/year | SM |
| … |  |  |  |

# Compliance Management

Compliance Management ensures the conformity of the organisation with all relevant requirements and standards, including those of the Safety Management. The verification of the compliance is mainly conducted through audit and inspection processes.

## Compliance Monitoring Programme

The Compliance Monitoring Programme of the organisation comprises:

|  |  |
| --- | --- |
| Audit and inspection procedures including related documents | Refer to OMM Chapter 5.2 «Audit and Inspections» |
| Scope and area of audit and inspection, including related checklist | Audit/Inspection Schedule, Checklist and Report |
| The schedule for the programme | Refer to OMM Chapter 5.1.1 «Programme Schedule» |
| Follow-up and corrective action procedures | Refer to OMM Chapter 5.4 «Findings, Corrective and Preventive Actions» |
| Feedback to the Accountable Manager | Refer to OMM Chapter 5.2 «Audit and Inspections» |
| Record and archiving system | Refer to OMM Chapter 10 «Record Keeping» |
| Compliance Monitoring Training | Refer to OMM Chapter 9 «Management System Training» |

### Programme Schedule

To ensure that all aspects of the organisation are reviewed periodically, the scope and area of the Compliance Monitoring Programme is divided in 4 parts and scheduled in a specified 24-month cycle:

|  |  |  |  |
| --- | --- | --- | --- |
| Part | Scope | Refer to(Attachment) | Schedule |
| A | Scope of approved activities | ATT5 | March  |
| B | Training standards | September  |
| C | Manuals, documents and records | January  |
| D | Management system procedures including safety and compliance management | May |

## Audit and Inspections

* ‘Audit’ means a systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.
* ‘Inspection’ means an independent documented conformity evaluation by observation and judgement, accompanied, as appropriate by measurement and testing, in order to verify compliance with applicable requirements.

| Step | Remarks | Tool | Responsibility |
| --- | --- | --- | --- |
| Planning  | Audit:Establish audit/inspection agenda according to a yearly programme scheduleTake into consideration:* former Audit/Inspection Schedule, Checklist and Report
* changes in the organisation
* changes in regulatory requirement
* changes in activities
* Findings and recommendations
* trends

Follow-up audits when necessaryAll aspects at least once within 24 monthsAssign Auditor(s): consider independence and qualification | Compliance Monitoring Programme Schedule, OMM Chapter 5.1 «Compliance Monitoring Programme» | CMM |
| Inspection:Spot-Check planning Review the inspection plan and performed inspections  | Compliance Monitoring Programme Schedule, OMM Chapter 5.1 «Compliance Monitoring Programme»Audit/Inspection Schedule, Checklist and Report | CMM |
| Preparation | Study relevant documentation, manuals and proceduresConsider Feedback & Reporting system, former audit/inspection reports, former actions and changesConsider CAAT Standardisation Audits and Inspections including Recommendations | Organisation’s DocumentationList of pending itemsAudit/Inspection Schedule, Checklist and Report | AuditorInspector |
| Execution | Audit:Apply different techniques:* Interviews
* witnessing of activities
* Examination of evidences, records and review of documents
 | Audit/Inspection Schedule, Checklist and Report | AuditorInspector |
| Inspection:Observe, Monitor, Witness the activityAnalyse the completion, results, product;Compare with defined philosophies, policies, procedures; Interview. | Audit/Inspection Schedule, Checklist and Report | AuditorInspector |
| Reporting | Establish Report Store ReportGive over to CMM | Audit/Inspection Schedule, Checklist and Report | AuditorInspector |
| Feedback to the ACM | Provide the ACM with the Report, data, circumstances and results | Audit/Inspection Schedule, Checklist and Report | CMM |
| ⇨ Continue with the Corrective and Preventive Action Process |

## Auditors and Inspectors

* Inspections and audits should be carried out by personnel not responsible for the function, procedures or products being audited;
* The Compliance Monitoring Manager may perform all audits and inspections or may appoint one or more auditors by choosing persons having the appropriate competence either from within or outside the organisation;
* If external persons are used to perform compliance audits or inspections:
* any such audits or inspections are performed under the responsibility of the Compliance Monitoring Manager; and
* the organisation remains responsible to ensure that the external persons have relevant knowledge, background and experience as appropriate to the activities being audited or inspected; including knowledge and experience in compliance monitoring.
* the organisation retains the ultimate responsibility for the effectiveness of the compliance monitoring function in particular for the effective implementation and follow-up of all corrective actions.

### Qualification

Auditors and inspectors should have and demonstrate relevant knowledge, background and experience as appropriate to the activities being audited or inspected; including knowledge and experience in compliance monitoring;

### Authority, Duties and Responsibilities

The authority, duties and responsibilities of an auditor are:

* conducting audits and inspections in accordance with the defined processes;
* evaluating safety management issues and procedures;
* evaluating the compliance of the organisation in accordance with the Compliance Monitoring Programme;
* supporting the establishment of audit and/or inspection checklist;
* establishing the audit and/or inspection report, as applicable;
* reporting of findings/deficiencies/concerns identified directly to the CMM/SM or as applicable, in accordance with the audit/inspection processes and providing recommendations for improving the organisation's operations, in terms of both efficient and effective performance;
* refusing an audit/inspection if:
* not trained and qualified as auditor;
* not in the position to demonstrate relevant knowledge, background and experience as appropriate to the activities being audited or inspected; and

if being responsible for the function, procedure or product being audited (audit only).

### List of Auditors and Inspectors

Refer to Attachment ATT7A «Auditors and Inspectors List».

## Findings, Corrective and Preventive Actions

* Correction is the action to eliminate a detected non-compliance.
* Corrective action is the action to eliminate or mitigate the root cause(s) and prevent reoccurrence of an existing detected non-compliance or other undesirable condition or situation. Proper determination of the root cause is crucial for defining effective corrective actions to prevent reoccurrence.
* Preventive action is the action to eliminate the cause of a potential non-compliance or other undesirable potential situation.

### Classification of Findings

|  |  |  |
| --- | --- | --- |
| Level | Corresponds | Description |
| 1 | unacceptable | red zone | any significant non-compliance is detected with the applicable requirements, with the organisation’s procedures and manuals or with the terms of an approval, or certificate which lowers safety or seriously endangers flight safety. |
| 2 | tolerable | yellow zone | any non-compliance is detected with the applicable requirement, with the organisation’s procedures and manuals or with the terms of an approval, or certificate which could lower safety or seriously hazards flight safety |
| OBS | Observation | green zone | opportunity for improvement which is minor gap, mostly documented and implemented. The management system that may be weak, cumbersome, redundant, overly complex, or in some other manner, may, in the opinion of the auditor, offer an opportunity for an organization to improve its current status. An observation is not subject to any corrective actions unless it is accepted by auditee for improvement. |

Level 1 Findings must be reported to CAAT.

### Corrective and Preventive Action Process

|  |  |  |  |
| --- | --- | --- | --- |
| Step | Remarks | Tool | Responsibility |
| Analysis | Analysis of action/measurement requiredPerform Risk AssessmentIdentification of the root cause and human factorsDefinition of mitigation/preventive actionEstablish corrective action plan | CAAT Document/Audit/ or Inspection Report;Third Party Safety/measures information (e.g. EASA);Audit/Schedule, Checklist and Report Occurrence ReportRisk Assessment Checklist | CMM with the management function of the area concerned |
| Initiation of actions and measures | Initiate corrective action and preventive action (Who does what, when and due date):* correction to eliminate problem
* corrective action to eliminate root cause
* preventive action to eliminate potential root cause
* define measurement criteria to evaluate effectiveness
 | List of pending itemsAudit/Inspection Schedule, Checklist and Report | Responsible management function of the area concerned |
| Monitoring of Effectiveness | Verify implementation of measures and the effectiveness | Follow-up audit or inspection | CMM |
| Feedback to the ACM | Inform the ACM with data, facts and results | Audit/ Schedule, Checklist and Report | CMM |

# Feedback and Reporting System

## Reporting and Feedback System

The reporting scheme is an essential part of the overall monitoring function with the aim to improve aviation safety. And moreover, to increase product quality, efficiency, job satisfaction and adding value to the organisation’s efficiency. The overall purpose of a reporting scheme is to use reported information to improve the level of safety performance of the Approved Training Organisation and not to attribute blame. It is complementary to the normal day-to-day procedures and ‘control’ systems and is not intended to duplicate or supersede any of them. The procedures are there to ensure that knowledge of relevant occurrences is disseminated, so that other persons and organisations may learn from them.

All persons involved in civil aviation must report any occurrence endangering or potentially endangering safety.

## Occurrence Reporting

The occurrence reporting documentation consists of specific procedures to report occurrences as laid out in the OM Part A, Chapter A.20.10 «Occurrence Reporting» and the follow-up process for the handling of occurrence reports as defined in Chapter 6.2.2 «Follow-up process for handling occurrence reports».

The reporting procedures in OM Part A, Chapter A.20.10 «Occurrence Reporting» include the following guidance to the reporter:

* responsibility;
* party to be notified/reported;
* dispatch time/time frames;
* address;
* means to be used.

### Reportable occurrences

For a list of mandatory reports refer to OM Part A, Chapter A.22.10.2 «Occurrences to be reported».

### Follow-up process for handling occurrence reports

| Step | Remarks | Tool | Responsibility |
| --- | --- | --- | --- |
| Report | Verify type of notification:* verbally; or
* complete «Reporting/Analysis Form»

Describe circumstance, issues, situation, occurrence rectification suggestionWithin 24h assign report to:* HT
 | Daily briefing; orReporting/Analysis Form | Author/Sender |
| Initial Analysis | Evaluate the severity and the necessity of immediate corrective(mitigation)/preventive actionOpen issue on the Pending Item listVerify the requirement to report to CAAT | Verbal Information/DataReporting/Analysis FormRisk Assessment ChecklistPending Item List | HT/SM |
| Notification | Notify CAAT not later than 72 hours after becoming aware of the occurrence | Report by the most practicable means of communication | HT |
| Mitigation | Define corrective action and preventive measures | Risk Assessment Checklist | HT/SM |
| Notification | If applicable notify CAAT regarding corrective/mitigation action and preventive measures | Communication means | HT/SM |
| Feedback | Provide the sender with a feedback | Reporting/Analysis Form; or verbally | HT/SM |
| Information | Notification of internal and external parties involved and/or interested | Reporting schemes of external parties and/ormeans as adequate to the case including investigation documentation or parts thereof | HT/SM |
| Implementation | Implement corrective/mitigation action and preventive measures |  | HT |
|  |  |  |  |

### Reporting Form

Refer to Attachment ATT6A «Reporting-Analysis Form».

# Emergency Response Plan

## Objectives and Scope

* **ERP Scope:**
* The ERP Concept has been designed in order to systematically assist the organisation in handling an Aviation Emergency, Accident or Serious Incident or any other event requiring activation of the Emergency Response Team.
* The Plan provides processes and guidelines to personnel performing essential tasks to ensure continuous operation, emergency handling and full recovery of the organisation, addressing both legal and moral responsibilities.
* **ERP Objectives:** The ERP Concept has been designed in order to fulfil the following objectives:
* Ensuring an orderly and safe transition from normal to emergency operations and return to normal operations;
* Outlining a communication and notification plan, including communication and notification to the authorities and the emergency response team;
* Defining composition, role and contact details of the emergency response team;
* Providing guidelines and initial response procedures for the emergency response team members so that the initial tasks may be performed correctly;
* Ensuring the welfare of employees, crew and passengers in a crisis situation.

## Concept and Planning

Recognising that the Approved Training Organisation utilises the facilities of *ATO Name*, the respective emergency plan applies.

* Refer to *Emergency Response Plan*

Describe the emergency response plan in compliance with CAAT Regulation No.22

# Management System Training

The basic training is provided to all employees when joining the Approved Training Organisation. It is based on the ATO’s management system documentation.

## Management System Basic Training

The basic training consists of:

| Training Subject | Level of Training | Standard of Performance | Instructor |
| --- | --- | --- | --- |
| The Approved Training Organisation and its Scope of Activity | overviewinstruction including facility walk-through | Knows the organisation, its facility and infrastructure and its fleetNames the scope of activity | HT |
| Organisation’s Strategic Planning and Safety Policy | in-depthcollaborative instruction | Understands the safety standard of aviation medicine including objectives and is able to actively apply the elements thereofNames the organisation’s vision and strategy | ACM |
| Organisation’s Documentation and System of Revision and Amendment | in-depthinstruction, self-study of content | Names the Approved Training Organisation’s documentation including manual system and knows the relevant documents, manuals and/or parts as required by the function | HT |
| Organisational Structure, Duties, Responsibilities and Accountabilities | in-depthcollaborative instruction, self-study | Is able to find the defined organisational structures management personnel including contacts and understands the role and function of the management personnelUnderstands and knows the duties and responsibility as defined for the function and is proficient to perform the respective duty | HT |
| Safety Management | overviewinstruction, explanation | Understands and is able to explain the basic principles of the safety management Understands and knows the own role within the safety management | SM |
| Compliance Management | overviewinstruction, explanation | Understands and is able to explain the basic principles of the compliance managementUnderstands and knows the own role within the compliance management | CMM |
| Occurrence Reporting | in-depthcollaborative instruction, case studies | Understands the different types of reporting and is able to report according to the defined reporting proceduresUnderstands and knows the own role within the occurrence reporting system | HT |
| Emergency Management Plan | overviewinstruction, self-study | Is able to find the EMP relevant documentation Names the priority and is able to act accordingly | HT |

## Management System Advanced Training

The advanced management system training shall ensure that the management personnel are able and skilled to establish, implement and maintain an effective management system. Additionally, all management functions, auditors and inspectors involved, shall have detailed and comprehensive knowledge of the Approved Training Organisation’s structure, vision, safety standard, scope of activity and procedures. Consequently, the content of the basic management system training shall be the prerequisite for advanced management system training.

Advanced Management System Training, as required by Management Function:

| Training Subject | Provider | Accountable Manager | Safety Manager | Compliance Monitoring Manager | Head of Trainings | Auditor | Inspector | Standard of Performance |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Advanced Management System Training | Internal | X | X | X | X | X | X | Gets expertise and comprehensive knowledge of the organisation’s management system and associated procedures. Is competent to maintain an effective management system within the organisation. Is skilled to actively promote safety standards of aviation medicine, to analyse and evaluate data for the purpose to identify trends and systematic weaknesses within the organisation, and to maintain continuous improvement |
| Safety Management Training | External |  | X |  |  |  |  | Is qualified and skilled to implement and maintain an effective Safety Management  |
| Compliance Monitoring Management | External |  |  | X |  |  |  | Is qualified and skilled to implement and maintain an effective Compliance Monitoring Management |
| Audit and Inspection Techniques | External |  |  |  |  | X | X | Is qualified and skilled to conduct, evaluate and document audits and inspections. Is competent to initiate measures and to monitor its effectiveness  |
| Relevant Standards and Requirements | External |  | X | X | X |  |  | Gets expertise and comprehensive knowledge of the relevant standards and requirements. Names the structure and content, and is able to find relevant paragraphs. Is skilled to interpret legal paragraphs to ensure legal compliance |

Basedon the organisation’s management system, the advanced management system training consists of:

| Training Subject | Standard of Performance | Instructor |
| --- | --- | --- |
| The Organisation and Scope of Activity | * Safety standard and vision of the organisation
* Scope of Activity
* Statement of Complexity
* Relevant Standards and Requirements
* Compliance Statement
* Exemption and Derogation
* Alternative Means of Compliance
* Locations, Facilities and Infrastructure
* Power of Authority
 | The participant shall practically show the ability to create the safety standard and the organisation’s vision as well as the scope of activities.Additionally, the participant shall be able to define and/or fully understand the complexity, relevant standards requirements, compliance statements, exemption and derogation, alternative means of compliance, locations, facilities and infrastructure, and the power of the Authority. | ACM |
| Organisation Documentation, System of Amendment and Revision | * Overview of the Organisation Documentation
* System and Form of Distribution
* System of Amendment and Revision
* Changes/Elements requiring prior Approval
* Changes/Elements not requiring prior Approval
* Control of External/Foreign Documents
 | The participant shall fully understand the requirement for the Approved Training Organisation’s documentation and its structures (including overview), distribution forms, and the control of external/foreign documents.Additionally, the system of amendment shall be explained together with the documentation «change management», also identifying items to be or not to be approved prior to the document’s publication.The participant shall be able to support and/or lead the organisation’s documentation needs and respective processes and document definitions, including changes. | HT |
| Organisational Structure, Duties, Responsibilities and Accountabilities | * Organisational Structure
* Management Personnel – Name and Contacts
* Duties, Responsibilities and Accountabilities
* Accountable Manager
* Safety Manager
* Compliance Monitoring Manager
 | The participant shall know the required/applied organisational structure of the company in detail and shall be able to explain/define duties, responsibilities and accountabilities for the different management functions/posts. | HT |
| Safety Management | * Hazard Identification and Risk Management
* Hazard Identification Process
* Reporting/Analysing Form (Hazard Reporting Form)
* Severity Classification
* Tolerability Matrix
* Risk Assessment Checklist
* Change Management
 | The participant shall fully support and enable the safety standard of aviation training and shall be able to define respective changes and policies to international standards.The participant shall furthermore practice hazard identification and risk management and shall enable or lead the processes for change management. | SM |
| Compliance Management | * Compliance Monitoring Programme
* Audit and Inspections
* Audit/Inspection Schedule, Checklist and Report
* Auditors and Inspectors
* Findings, Corrective and Preventive Actions
* Classification of Findings
 | The participant shall actively lead the Compliance Monitoring Programme/processes and shall fully understand respective audit/systems, checklists, finding classifications and resulting corrective and preventive actions.The participant shall be able to systematically communicate with auditors and inspectors, and, if within the activity’s scope, shall be able to lead these persons and to enable their important role within the company. | CMM |
| Feedback and Reporting System | * Reporting and Feedback System
* Occurrence Reporting
 | The participant is able to establish a reporting and feedback system including occurrence reporting and can explain data storage and evaluation, including the ways/consequences/influences to the management. | HT |
| Emergency Management Plan | * Relevant documentation
* Objectives and Scope
 | The participant fully understands the requirements, objectives and scope of an emergency management plan and knows the relevant content of the applicable documentation. | HT |
| Management System Training | * Basic Training
* Advanced Training
* Continuous Training
 | The participant explains the concepts for basic and advanced management system training, is able to define objectives of a general or actuality-based kind, or, according to the managerial role, and practices both types of such training. | HT |
| Record Keeping | * Record Keeping and Archiving
 | The participant designs a system for record keeping and archiving, respecting all requirements (i.e. storage periods, etc.) and is able to run it smoothly. | HT |
| Contracting | * Contracting
 | The participant fully understands the concept of contracting and the processes required. | ACM |

## Management System Continuous Training

The purpose of continuous management system training is:

* to exchange data, information, knowledge and skills based on the organisation’s practical experience, expertise;
* to ensure that knowledge of occurrences and their root causes are communicated;
* the continuous learning, improving of skills and changing of behaviour;
* to facilitate changes in Approved Training Organisation’s management, practices and procedures.

The HT ensures that any elements of systematic analysis of factual data and results of:

* Hazard identification and Risk Management;
* Audit and Inspections, especially Findings, Corrective and Preventive Actions;
* Reporting and Feedback System;
* Changes in relevant standards and requirements; and
* Studies of aviation literature

are addressed adequately and promptly throughout the year during the ATO’s *monthly* management meeting and during instructor refresher trainings.

# Record Keeping

## Record Keeping and Archiving

The Approved Training Organisation’s system of record keeping allows the storage and reliable traceability of all its activities and related data. The record keeping system ensures that the records are always accessible and traceable throughout the required retention period and protection from damage, alteration and theft are ensured.

### Document Management Lifecycle

### Student related Records

| Document | Responsibility | Type of Storage | Place of Storage | Storage period | Follow-up |
| --- | --- | --- | --- | --- | --- |
| Syllabus and related documentation  | HT | File Folder | Office XY | 5 years | Scan and destroy paper dossier |
| … |  |  |  |  |  |

### Management System related Records

| Document | Responsibility | Type of Storage | Place of Storage | Storage Period | Follow-up |
| --- | --- | --- | --- | --- | --- |
| Reporting and analysing form | SM | EDP | P://…/Reporting | 5 years | Archive  |
| Audit/Inspection Schedule, Checklist and Reports | CMM | Paper | File-folder Office CMM | 5 years | Scan and destroy paper-dossier |
| Risk Assessment Checklist | SM | EDP | File-folder Office SM | 5 years | Scan and destroy paper-dossier |
| Revisions of the ATO-OMM  | ACM | Paper | File-folder Office ACM | 5 years | Scan and destroy paper-dossier |
| … |  |  |  |  |  |

### ATO Personnel related Records

| Document | Responsibility | Type of Storage | Place of Storage | Storage period | Follow-up |
| --- | --- | --- | --- | --- | --- |
| Approved Training Organisation’s introduction programme | ACM | File Folder | Office XY | until last day of employment | destroy |
| … |  |  |  |  |  |

### IT Backup-System

Describe Organisation’s IT backup procedure.

# Contracting and Leasing

## Contracting and Monitoring of Contractors

Third party activities are within ATO Name scope of approval when they are performed by another provider or company working under the ATO’s terms of approval. The ultimate responsibility for the contracted service provided remains with the Approved Training Organisation.

|  |  |  |
| --- | --- | --- |
| Product/Service | Third Party | Agreement |
| Maintenance | Maintenance FacilityAddress | contract |
| Simulators | Simulator Operator | contract |
| ... |  |  |

When contracting, the following process applies:

|  |  |  |  |
| --- | --- | --- | --- |
| Step | Remarks | Tool | Responsibility |
| Definition of Requirements and Needs | * Define the product, service, activity or task to be contracted
* Specify the criteria for safety of aviation standards and quality
* Establish budget and cap on costs
 | Office applications | ACM |
| Offer | * Request firm offer including evidences of certificates, diplomas, government permissions, authorisations and approvals as applicable
 | Offer documentation | ACM |
| Release | * Release and approval of offer, conditions, budget and cap on costs
 | Office applications | ACM |
| Evaluation | * Verify that the contractor holds the required certificates, diplomas, government permissions, authorisations and approvals as applicable
* Verify the adequacy of the facilities and equipment as well as the availability of resources
 | Offer documentationPersonal visit of facilities | ACM |
| Safety Impact | * Decide whether risk assessment is necessary
 | Risk Assessment Checklist | SM |
| Compliance Check | * Decide whether a detailed audit is required
* Establish audit checklist especially for the contractor case concerned
 | Audit/inspection schedule, checklist and report | CMM |
| Decision and Closing | * Decide upon suitability, adequacy and acceptability
 | Audit/inspection schedule, checklist and report | ACM |
| Compile Contract | * Issue of contract
 | Contract | Contractor |
| Contract Review | * Evaluate contract, verify that the contracted activity, product or service is clearly defined
* Verify costs
 | Contract | ACM |
| Sign Contract | * Signing of contracts
 | Contract | ACM |

### Continuous Monitoring

When delegating tasks to third parties, the organisation ensures that necessary qualifications exist, are upheld and that resources and competences are affirmed.

| Service/Product/Activity | Monitoring | Frequency | Responsibility |
| --- | --- | --- | --- |
| Continuous education and Training | * Ensuring the validity of necessary certificates, authorisations and syllabus approvals
 | According to the individual education and training needs | HT |
| * Analysis of trainee's feedback
 | Each training | HT  |
| Examiner | * Ensuring that the examiner is qualified and holds the relevant certificate
* Refer to examiner list
 | Each exam | HT |
| … | … | … | … |