Approved Training Organization Certification Guide
- Flight Training -

Version 4

07 April 2015

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Foreword

This certification guide contains information that is relevant to gaining and maintaining certification as an approved training organization (ATO) under Part 3 of the BAG Generic Regulations.

Just as important, this document provides guidance for establishing robust and consistent governance practices to assist training institutions in safely navigating within a performance-based regulatory environment. The expectations are that approved training organizations will continuously refine their policies and procedures to ensure that their quality system is resilient to change and remains focused on achieving excellence.

Director General,
Civil Aviation Authority.

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1.0   REVISION HISTORY

(1)   Changes to this document will be made as necessary and no specific revision cycle exists. All changes will be indicated by the appearance of a black bar in the left margin with major changes also summarized in the "Change Summary" section below. When changes are made, the document will be re-issued in its entirety using a new version number and issue date.

(2)   Amendment suggestions or comments should be sent to:

> BAGASOO SECRETARIAT,
> FIRST FLOOR, NCAA BUILDING
> ABUJA AIRPORT, NIGERIA

2.0   CHANGE SUMMARY

(1)   The following is a summary of major changes from Version 2:

   (a) "Revision History" and "Change Summary" sections were inserted (page 6)

   (b) "Glossary of Terms" section was inserted (page 7)

   (c) "Attestation of Certification" was inserted (page 31)

   (d) Term "compliance audit" has been replaced by "compliance validation inspection"

3.0 GLOSSARY OF ABBREVIATIONS

1.0   The following abbreviations are used in this document:

(a)   **ATO**: Approved Training Organization;

(b)   **ATO-C**: Approved Training Organization - Certificate;

(c)   **ATO-OC**: Approved Training Organization - Operator Certificate;

(d)   **CAR**: Civil Aviation Regulation;

(e)   **CEO**: Chief Executive Officer;

(f)   **CPL**: Commercial Pilot Licence;

(g)   **EASA**: European Aviation Safety Agency;

(h)   **FTUOC**: Flight Training Unit Operators Certificate;

(i)   **FSTD**: Flight Simulation Training Device;

(j)   **ISO**: International Standards Organization;

(k)   **MPL**: Multi-crew Pilot Licence;

(l)   **NAA**: National Aviation Authority;

(m)   **NACIS**: National Aviation Company Information System;

(n)   **PDCA**: Plan, Do, Check, Act;

(o)   **PPL**: Private Pilot Licence;

(p)   **POI**: Primary Operations Inspector;

(q)   **QA**: Quality Assurance;

(r)   **QMS**: Quality Management System;

(s)   **QS**: Quality System;

(t)   **SMS**: Safety Management System;

(u)   **TCM**: Training Control Manual;

(v)   **TSA**: Training Services Agreement; and

(w)   **TRTO**: Type Rating Training Organization.

4.0   INTRODUCTION

(1)   This guide is intended for use by applicants seeking [BAG STATE] certification as an Approved Training Organization (ATO), pursuant to *Part 3* of the *Civil Aviation Regulations* (CARs).   It outlines the processes, policies, and procedures by which companies can obtain and maintain a certificate in good standing.

(2)   Future revisions will be designed to improve the depth and the clarity of the information presented. Certificate holders are, therefore, encouraged to include this guide in their company's documentation control procedures.

5.0   IS AN ATO CERTIFICATE RIGHT FOR YOU?

(1)   The three training activities that obligate your company to hold such a certificate are:

(a)   Training towards the issuance of a type rating on either:

(i)   A transport category aeroplane that is certificated to be operated by two or more pilots, or

(ii)   A turbo-jet powered aeroplane;

(b)   Recurrent training for the purposes of maintaining currency on those aeroplanes specified in (a); or

(c)   Training leading towards the issuance of a Multi-crew Pilot Licence (MPL).

(2)   The [BAG STATE] regulatory requirement to become an ATO is only mandated for training providers that are conducting those flight training activities described in paragraph (1), when the training occurs;

(a)   Within [BAG STATE]; or,

(b)   Outside [BAG STATE], when the training is intended to satisfy [BAG STATE] pilot licensing requirements (whether it be initial or recurrent training activity).

(3)   Notwithstanding paragraph (1), an applicant for a certificate is not compelled to provide any of the aforementioned training. An ATO can be authorized to provide any form of flight training service providing it meets the regulatory requirements specific to the intended activity.

(4)   Some of the benefits of operating as an ATO are:

(a)   *Subpart 407* is a performance-based regulatory environment;

(b)   Since the regulations are less prescriptive, more efficient practices and methodologies in reaching required objectives can be introduced;

(c)   An ATO has greater freedom to expand their scope of services as market forces change; and

(d)   By operating within a quality system, an ATO can apply for an "alternative means of compliance" approval from the *Minister* and thereby take advantage of the benefits provided by improvements in technology and methodologies. This concept is explained in greater detail later in the guide.

(5)   Current [BAG STATE] Flight Training Unit Operator Certificate (FTUOC) holders may find it advantageous to operate as an ATO. If that training unit is successful in becoming certified as an ATO, then all of that company's previous authorities could simply be transferred onto their new Approved Training Organization Operator Certificate (ATO- OC). At that point, the company could elect to either surrender their FTUOC or keep it and conduct specific types of training activity under each separate certificate. The decision to operate under two certificates could therefore be determined by whether the

additional overhead necessary to conduct a segment of their business within the construct of a quality system is cost effective or not.

(6)   Since an approved training organization may be operating only flight simulation training devices (FSTD), there are two different types of certificates for an ATO, which are:

(a)   An Approved Training Organization Certificate (ATO-C), if that organization's activities does not directly involve the operation of aircraft; and

(b)   An approved training organization operator certificate (ATO-OC), if that organization's activities directly involve the operation of aircraft.

(7)   The use of the phrase "directly involve" in paragraph (6) is necessary since an ATO could have a training services agreement, pursuant to CAR Part 3, whereby another party, which holds their own operator certificate, operates the aircraft on behalf of the ATO. In such a case, the ATO would only require an ATO-C.

6.0   CERTIFICATION PROCESS – GENERAL

(1)   There are two distinct phases in receiving certification as an approved training organization. Those are identified as the pre-certification and the final certification phases (See Fig 1).

(2)   The pre-certification phase could extend over a year or more in duration depending upon a number of factors, such as:

(a)   The scope and complexity of the company's business model;

(b)   The developmental maturity of the applicant's business;

(c)   The effectiveness of the applicant in meeting all the regulatory compliance requirements; and

(d)   The ability of the applicant to prepare their company to meet the challenges of a "system" assessment(s), which is focused on evaluating processes and outcomes.

(3)   Organizations that already hold a training centre certificate issued under FAR 142 or possess an European Aviation Safety Agency (EASA) Type Rating Training Organization (TRTO) designation may already have some of the attributes and functionalities required for certification as a [BAG STATE] ATO. Regardless, you may find there are some significant gaps that need to be addressed. The correspondence matrix described in the pre-certification phase will be instrumental in determining where those gaps may lie.

(4)   The final certification phase involves the successful completion of a quality system assessment and, when an applicant is seeking an ATO-OC, a Safety Management System (SMS) assessment.

7.0   PRE-CERTIFICATION PHASE

(1)   The first step in the application process is to advise [BAG STATE] of your company's intention to operate as an approved training organization. This initial notification should include an overview of the type of flight training services your company intends to provide, the desired start date, and contact details of those individuals that you require [BAG STATE] to communicate with during the certification process. This should be accomplished through the submission of written notification, via electronic means or otherwise, which allows your submission to be retained for record keeping purposes.

(2)   [BAG STATE] will then open up a file in the National Aviation Company Information System (NACIS) and forward you guidance information, which will include the latest version of this document to assist you in expediting the certification process.

(3)   The next step in the process is to develop and document your company's *risk profile*. The importance of accurately identifying all the risks attached to your primary and secondary business activities cannot be overstated. The risk profile, once completed, will represent a key component of your "quality system". To that end, it will serve as the underpinning roadmap in developing your organization's quality control mechanisms and quality assurance policies and procedures. Its thoroughness, accuracy, and continued relevancy are paramount. The regulator will also use it in establishing oversight "trigger" points to determine which important events or circumstances (risk indicators) may warrant a regulatory review. (See Chapter 4 –Risk Profile).

(4)   Once the risk profile has been completed, the final development of your organization's policies and procedures that deal specifically with the quality system and, when applicable, the safety management system requirements are put into place.

(5)   When a high level of confidence exists that the objectives of *CAR Part 3* are met, you can then develop your company's "correspondence matrix", sometimes referred to as a "coherence matrix". This tabulated document lists all the regulatory provisions that apply to your organization and all their associated standards. Beside each item you need to indicate how you are able to demonstrate your company's compliance. A snap shot of what a segment of it might look like is provided in *Appendix D*. The purpose of the matrix is two-fold: it serves as an invaluable roadmap in driving your organization's compliance efforts, and; it provides the regulator with a high level of confidence that you exercise due diligence in your business processes. What's noteworthy is that [BAG STATE]'s inspectors often use the same approach during compliance inspections. By providing [BAG STATE] with a copy of your matrix when submitting your formal application for certification, the assigned inspection team is more apt to render a favourable determination by following an accurate roadmap that you have designed.

(6)   Once you're convinced that you've got all the necessary components in place, it is then time to make a formal application for certification. The details of that application are specified in the *CAR Part 3* and can be submitted by using the form attached in *Appendix A* of this document.

(7)   Following review of an accurately completed application, [BAG STATE] will inform your company of its intent to conduct a pre-certification compliance validation inspection. Once the inspection deems that the applicant is fully compliant with the applicable regulations and standards, [BAG STATE] will conduct a review of the proposed training programs. Only then will <u>provisional</u> approval to operate as an ATO, for a period of not greater than one year, be granted. The use of the term "provisional" is deliberate, in that there will be conditions and restrictions that will be attached to your authority to commence operations.

8.0   FINAL CERTIFICATION PHASE

(1)   Once you've gained provisional approval to operate as an ATO, you have now entered the final certification phase. It is at this point that you should begin to fine tune your organization's policies, processes, and procedures in preparation for [BAG STATE]'s final assessment(s) of your quality system and, when applicable, safety management system.

(2)   Do not allow yourself to be unnecessarily rushed into requesting that these assessments be conducted. A poor result in either assessment could have far reaching consequences for the company and its business plans. Take the time to test your organization's ability to deal with challenges and make refinements to your policies, processes, and procedures. This type of activity is at the very core of any good quality assurance

program. It's also during this timeframe when a developing business can work towards creating a corporate culture that strives towards continuous improvement. (See 10.0 - Quality System (QS)).
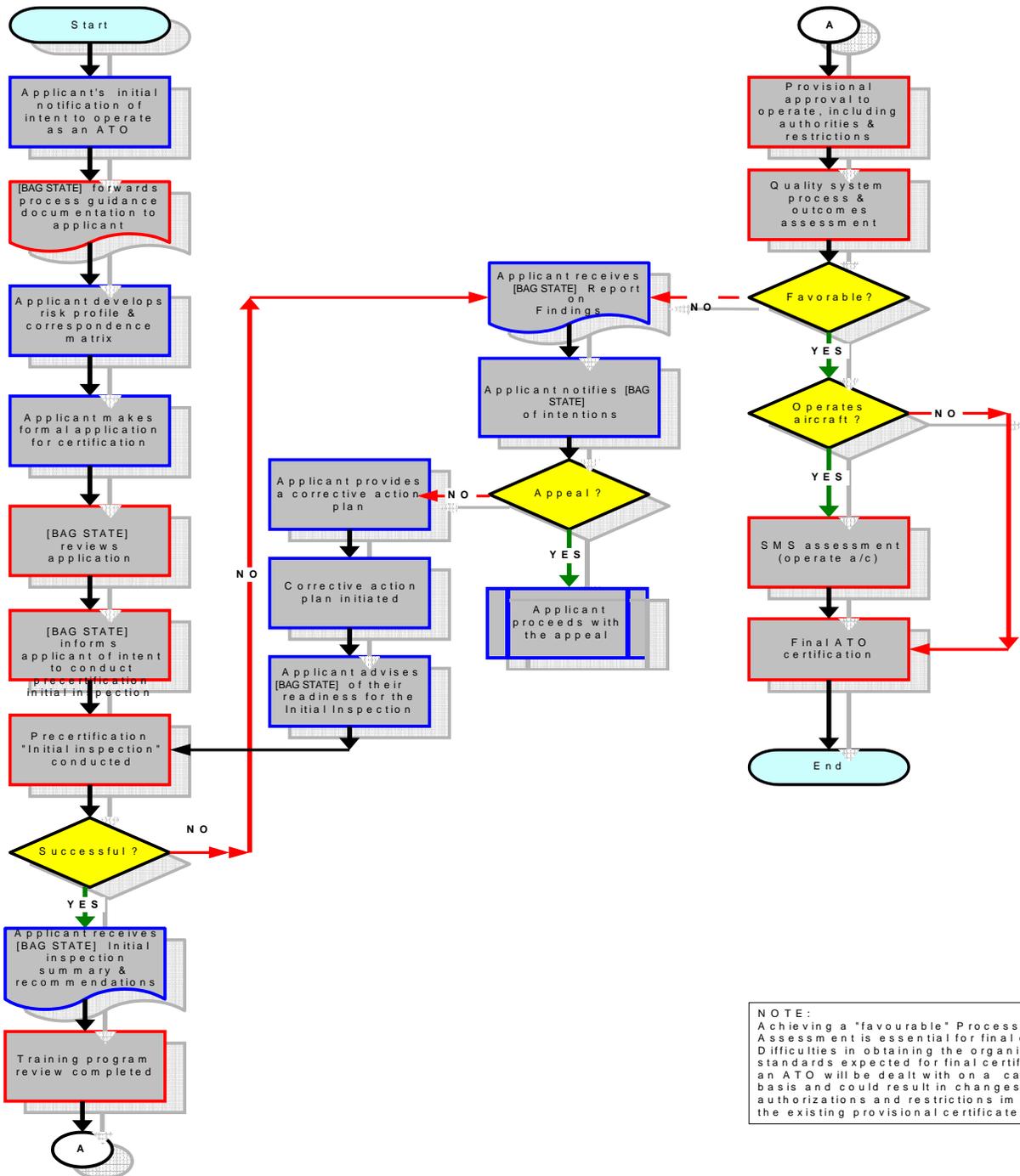
(3)   Having previously undergone a compliance validation inspection, the quality system assessment is quite different. The original inspection was confirming that your company had all the necessary components/elements that were required by regulation. This time the focus will be on evaluating your organization's processes and outcomes. In other words, do the prescribed components, elements, and attributes actually function effectively in achieving the desired outcomes? For those that have some difficulty understanding how this is actually accomplished, they should consider contacting a reputable Quality Management System (QMS) consultant. Keep in mind that an assessment is a comprehensive and systematic review of an organization's activities and results, referenced against its management system. In your case, this assessment will involve:

(a)   Interviewing key process owners and participants;

(b)   Observing activities; and

(c)   Reviewing documentation (including records, policies and procedures documents)

(4)   The QS assessment report that you'll receive will provide an overall view of your organization's performance and the degree of maturity of your management system. It will also identify areas requiring improvement and help you to determine priorities. Most importantly from [BAG STATE]'s perspective, it will also set the degree of reliance that can be placed upon your organization's review processes, which includes: management review; internal audits; and, quality assurance processes. And finally, the report will inform you of [BAG STATE]'s determination of your organization's success in achieving final certification as an approved training organization.

9.0   ATTESTATION OF CERTIFICATION

(1)   *CAR Part 3* requires the holder to prominently display their certificate in a place readily accessible to the public. This is not intended to suggest that the full printout of the currently valid certificate be placed out for public viewing. Rather, [BAG STATE] will award an official embossed Attestation of Certification, following the successful completion of the final certification process.

(2)   The display of this document will be powerful evidence of [BAG STATE]'s recognition of your organization's demonstrated commitment to excellence in flight training. In time it is hoped that it will serve as a significant discriminator between yourself and those that have chosen not to pursue such a distinction.

FIGURE 1 – CERTIFICATION PROCESS MAP

INITIAL ATO CERTIFICATION PROCESS MAP

```
Start

Applicant's initial
notification of
intent to operate
as an ATO

[BAG STATE] forwards
process guidance
documentation to
applicant

Applicant develops
risk profile &
correspondence
matrix

Applicant makes
formal application
for certification

[BAG STATE]
reviews
application

[BAG STATE]
informs
applicant of intent
to conduct
precertification
initial inspection

Precertification
"Initial inspection"
conducted

Successful ?   ── NO ──>

YES

Applicant receives
[BAG STATE] Initial
inspection
summary &
recommendations

Training program
review completed

A
```

```
Applicant receives
[BAG STATE] Report
on Findings

Applicant notifies [BAG
STATE]
of intentions

Appeal ?   ── NO ──>  Applicant provides
                        a corrective action
                        plan

YES

Applicant proceeds
with the appeal

Corrective action
plan initiated

Applicant advises
[BAG STATE] of their
readiness for the
Initial Inspection
```

```
A

Provisional
approval to
operate, including
authorities &
restrictions

Quality system
process &
outcomes
assessment

Favorable ?   ── NO ──>

YES

Operates
aircraft ?   ── NO ──>

YES

SMS assessment
(operate a/c)

Final ATO
certification

End
```

NOTE:
Achieving a "favourable" Process/Outcomes
Assessment is essential for final certification.
Difficulties in obtaining the organizational
standards expected for final certificaiton as
an ATO will be dealt with on a case-by-case
basis and could result in changes to
authorizations and restrictions imposed on
the existing provisional certificate.

10.0   QUALITY SYSTEM – GENERAL

(1)   The obligation for an ATO to possess and operate within a quality system is specified in *Part 3* of the CARs. The objective is for the ATO to have relevant well- developed policies and procedures, which ensure the existence of effective quality assurance and proactive continuous improvement processes.

(2)   Although the Director of Training is ultimately responsible for establishing and maintaining an effective quality system, it is the Manager, Quality Assurance, who is the day-to-day custodian of the system and the company's risk management program. It stands to reason that anyone appointed to such a position requires a solid understanding of quality assurance and improvement processes, as it is in this area that good organizational governance resides. Successful application on a continuous basis of well thought QS policies and procedures are instrumental to achieving the highest standards of training excellence and the continued prosperity of the business. By virtue of its very presence, the quality system provides the approved training organization with a very powerful business edge: the ability to seek the *Minister's* approval for an "alternative means of compliance" from certain traditionally prescriptive regulatory requirements. On the other hand, the consequence of having ineffective QS practices is diminished levels of performance, reduced customer satisfaction, and ultimately, the revocation of the certificate.

(3)   For the purposes of approved training organizations that provide flight training, there are two instances that obligate such an entity to possess a risk profile. Firstly, CAR Part 3, "*Approved Training Organizations*", requires all ATOs to institute best practices by operating within a quality system (QS), which is focused on achieving training excellence. Recognizing that the majority of the activities undertaken by an ATO might not pose significant levels of safety risk, a risk profile to meet quality system requirements looks at areas that could expose the business to adverse consequences. Suffice it to say, the risk profile that your ATO is obligated to adopt is specifically designed to address the "quality" needs of your business model. Of additional significance is that, if it is properly developed and documented, the risk profile will provide the regulator with a better appreciation of the organizational and operational strengths of your company in its determination of your suitability to operate within a performance-based regulatory environment. Secondly, those ATOs that engage in activity that directly involves the operation of aircraft are further required to implement and maintain a SMS. One of the key features of a safety management system is its ability to identify hazards and effectively manage those elements that pose a safety risk. It requires holders of any operator certificate to analyze, assess, control and monitor those risks through a pro-active risk management process. Information on implementing a safety management system, *Advisory Circular AC 01-004 - Guidance on Safety Management Systems,* is available on the [BAG STATE] website.

(4)   The requirement for holders of an ATO-OC, issued pursuant to *CAR Part 3*, to operate within both "systems" should not pose a conflict. The two systems should not be considered mutually exclusive, but rather complementary. For instance, both require risk management, quality control, and quality assurance policies and procedures. Their designs are similar and the only distinct difference between the two systems is in their overarching areas of focus, training quality excellence, or, safety management excellence. Therefore, approved training organizations that are directly engaged in the operation of aircraft should look at integrating the two regulatory requirements within a single risk management plan. Providing it is clear that the requirements of both SMS and

QS are met, there is no need to have replication in your organization's governance model.

(5)   Some key components of a QS are:

(a)   An organizational risk profile;

(b)   A risk management plan;

(c)   Quality assurance policies and procedures;

(d)   An organizational training plan;

(e)   Documentation management policies and procedures;

(f)   Communication policies and procedures; and

(g)   Strategic review policies and procedures

11.0   QUALITY SYSTEM – RISK PROFILES (GENERAL)

(1)   A risk profile is a list of known hazards that are tied to activities within your organization, which eventually are used to determine the controlling measures necessary to minimize the threats they pose to the well being of the business.

(2)   There are several reasons why companies would establish a well-developed organizational risk profile. For instance, some businesses find it useful for strategic planning purposes, instituting occupational safety measures, or even in establishing manufacturing design and production criteria. The approved training organization's risk profile is one of the most important documents in its arsenal of management tools. Once fully developed, it should be used in determining the monitoring and measurement activity that the company undertakes in its on-going governance processes.

12.0   QUALITY SYSTEM – ORGANIZATIONAL RISK PROFILE

(1)   There are a number of methodologies that can be adopted when developing an organizational risk profile. One common approach is to begin by developing a "high-level" list of activities that must be undertaken to keep the organization functioning smoothly and permit it to effectively deliver a great product: in the ATO's instance, a thoroughly well trained pilot. In order to accomplish this, it would probably be best if employees that possess some expertise in carrying out those activities developed the list. This would permit the list to be more easily broken down into subcomponents of each activity. A simplified example of such an exercise would perhaps yield the following activities:

(a)   **Administrative Activities -** Record Keeping – Training Files – Students – Secure Storage – Controlled Access & Availability.

(b)   **Operational Activities –** Aircraft Training – Operational Control - Flight Dispatch [BAG STATE]– Weather Information Analyzing & Dissemination.

(c)   **Regulatory Activities –** Authorized Training Programs – Multi-crew Pilot Licence – Program Requirements – Aviation English Language Proficiency Training & Testing.

(2)   The follow-on step could involve the determination of the hazards, threats, or perils that are associated with those activities. These should then be categorized as to their relative severity and the frequency of exposure of the organization to these risk contributors.

(3)   Keep in mind, that from [BAG STATE]'s perspective, a risk profile needs to be a   concise management-planning tool focused on accurately identifying the organization's exposure to all risks that are likely to adversely affect quality and safety. It needs to be constantly

updated, easily accessible, and understood by all employees. It serves as the underpinning document to the approved training organization's on-going risk management program. Once the risk profile has been developed, it's time to construct the organization's risk management program within the context of a quality system.

13.0   QUALITY SYSTEM – RISK MANAGEMENT PLAN

(1)   Stemming from the organizational risk profile completed earlier, the applicant must then develop a plan for the management of risks within their operational environment.

(2)   With a view towards establishing a final priority list, the next step should be to identify day-to-day controlling measures. These are measures that, by themselves, may not eliminate the identified threats. Rather, they provide the organization with a modicum of comfort in knowing that they have marginalized the threat under normal working conditions.

(3)   With that caveat in mind, organizations should also establish a means of "sounding a proactive alarm" by identifying special instances/circumstances that may warrant a higher level of vigilance beyond what is provided by the day-to-day controlling measures. This could be perhaps accomplished by the determination of "risk indicators": the types of extraordinary activities/events that would likely elevate the level of threat or, perhaps, even change the hazards.

(4)   An example of an extraordinary activity could be the introduction of new record keeping software. In this case, the traditional controlling measure of daily auto-saving may not provide adequate protection from the possibility of data corruption during the changeover period. With all the controlling measures in place, the depth and frequency of planned on-going quality assurance-related activity can be scoped out.

14.0   QUALITY SYSTEM – QUALITY ASSURANCE ACTIVITIES

(1)   A documented quality assurance plan defines and establishes an organization's quality policy and objectives. It also allows an organization to document and implement the procedures needed to attain these goals. Properly implemented, it ensures that procedures are carried out consistently, that problems can be identified and resolved, and that the organization can continuously review and improve its procedures, products and services. It is a mechanism for maintaining and improving the quality of products and services so that, according to the requirements of [BAG STATE], they consistently meet or exceed the organization's implied or stated needs and fulfill their quality objectives

(2)   Effective quality assurance activities should encompass well designed and documented procedures for:

   (a)   Product and process control

   (b)   Inspection and testing methods

   (c)   Monitoring of equipment including calibration and measurement

   (d)   Internal and external audits

   (e)   Monitoring of corrective and preventive action(s), and

   (f)   The use of appropriate statistical analysis, when required

(3)   Most modern management systems follow the Plan, Do, Check, and Act (PDCA) cycle of continuous improvement. In this model, all of the individual processes in an organization are planned (PLAN), performed as planned (DO), reviewed to ensure use and

(4)   The performance of the organization's quality assurance activities will, in the end, be determined by the quality of the personnel who do the work. You will want to ensure that personnel have the knowledge, experience, and personal suitability to undertake Quality Assurance (QA) tasks. It's also expected that key process owners would have undergone some form of specialized International Standards Organization (ISO) audit training.

(5)   There are many existing quality assurance standards. The most appropriate system for your organization will depend upon the size and complexity of your operation. It should be tailored to meet your specific requirements. As with all components of the SMS, it can be as simple or complex as you want and should be monitored to ensure it remains appropriate.

(6)   The objective of your company's quality assurance activities can be summarized as follows:

   (a)   Identifies the processes that personnel are expected to follow for a given activity;

   (b)   Verifies that personnel are following the required processes;

   (c)   Validates the processes by ensuring that the desired outcomes are achieved;

   (d)   Identifies undocumented processes and processes that are ineffective and/or inefficient;

   (e)   Follows-up on processes that have been changed (corrective/preventative actions) to ensure that they are being used and are effective; and

   (f)   Provides senior management with the documentary evidence of the above activities.

15.0   QUALITY SYSTEM – ORGANIZATIONAL TRAINING PLAN

(1)   *Part 3* of the CARs obligates all levels of management to ensure that approved training organization employees receive the highest calibre of training in order to achieve the best qualifications and the necessary individual competencies to perform their jobs. But just as important, is the need for all ATO personnel to receive excellent training that ties the employee to the ATOs organizational needs.

(2)   This need to develop and maintain an integrated organizational training plan is identified through regulation for SMS as described in *1.6.1.2 of the CARs*. The organizational training requirements to support a quality system (QS) approach are identified in a less prescriptive manner, and more through inference, throughout *Part 3.*

(3)   The maintenance of any effective systems-based approach requires a pervasive organizational culture focused on achieving targeted objectives. It, therefore, stands to reason that achieving such lofty performance standards can only be realized when each employee understands and consistently adheres to company-established "best practices". Clearly, the QS and SMS training needs of each area of work, and its respective employee positions need to be identified and then well documented training policies and procedures established before a company can aspire to operating to its full potential.

(4)   Some of the areas of study, which could be considered in the development of an organizational training plan for employees include:

   (a)   Corporate ethos, objectives, and relationships;

(b)   Basic human factor issues that can impact human performance and lead to errors;

(c)   Communication protocol and techniques;

(d)   Audit principles;

(e)   System assessment and corrective action analysis;

(f)   Hazard identification and risk analysis; and

(g)   Emergency response preparedness

16.0   QUALITY SYSTEM – DOCUMENTATION MANAGEMENT

(1)   One of the most common finding in audits of training institutions results from systemic documentation control weaknesses. A shortcoming in this area is a sure-fire guarantee to poor standardization in the delivery of training programs, frequent deficiencies in overall student performance, erroneous or erratic record keeping practices, and eventually, lasting damage to a company's reputation. In the case of an approved training organization, such a condition will most certainly lead to a suspension and, perhaps, even the permanent cancellation of the certificate.

(2)   *Subsection 9.2.2.11 of the CARs* continuously speaks to the need for strong documentation control processes, which ensure the availability of only the most recently promulgated information. The close management of such critical documents and information is designed to accomplish several key objectives, including:

      (a)   Create a central repository for the issuance and maintenance of an ATO's documentation;

      (b)   Develop enduring policies and procedures for ensuring the continued high content standard of "controlling" documents", such as the:

            (i)   Maintenance Control Manual

            (ii)   Flight Training Operations Manual

            (iii)   Training Control Manual, and

            (iv)   Instructor Guide

      (c)   Establish organizational policies and procedures governing the amendment practices of key documents and records, including the purging and archiving procedures of outdated copies of information; and

      (d)   Protect against unauthorized access, entries, and removal of information from files or documents, including guards against data corruption.

17.0   QUALITY SYSTEM – COMMUNICATION POLICIES AND PROCEDURES

(1)   Whether it is the safety policy statement issued pursuant to *Subpart 3.2 of the CARs*, or the corporate mission statement so often associated with a company's "branding", effective communication is a critical attribute of any successful undertaking. Not only is the construct of the message important, the delivery frequently proves to be the real determinant in the effectiveness of any communication effort. It's therefore incumbent upon every organization, particularly a service oriented one such as an ATO, to establish and maintain effective communication policies and procedures.

(2)   Communication policies and procedures should be developed for both external and internal purposes recognizing the need for respecting client privacy, protecting intellectual property rights, and meeting regulatory oversight requirements. Issues that could be addressed in an ATO's communication policies, processes and procedures are:

   (a)   Review and promulgation of organizational objectives and strategic plans;

   (b)   Publication and distribution of senior management's policy statements regarding the institutionalization of a commitment to quality system and safety management system practices;

   (c)   Traditional lines of reporting and correspondence protocols

   (d)   Processes for initiating and reporting changes to documentation, methodologies, organizational structure, or personnel;

   (e)   Initiation, production, and dissemination of quality assurance and, when applicable, safety management system activities and reports;

   (f)   Dissemination of regulatory information/directives;

   (g)   Distribution of and response to client or regulatory feedback; and

   (h)   Application of a non-punitive reporting culture

18.0   QUALITY SYSTEM – STRATEGIC REVIEW POLICIES AND PROCEDURES

(1)   A quality system approach requires management to regularly review the results of:

   (a)   Internal audits;

   (b)   Corrective and preventive actions;

   (c)   Performance against objectives

   (d)   Changes to the system; and

   (e)   Recommendations for improvement

(2)   Quality assurance, as stated earlier, requires a commitment to continuous improvement practices. In most instances, these improvements represent corrective action resulting from the company achieving less than desired results during an audit or assessment. The danger with sole reliance upon this approach is that once the company is able to continuously achieve the desired outcomes then the continuous improvement process could morph into a continuous inertia process. In this situation, a company is lulled into a false sense of security while their actual performance standard suffers a diminished level of return. Given today's rapidly changing operating environment, a flight training organization responding only to corrective action needs will eventually be providing services that are designed towards addressing yesterday's requirements rather than preparing to tackle tomorrow's.

(3)   A true "quality system" approach invokes the need to establish policies and procedures for accomplishing periodic strategic reviews. This review should delve into the organization's assumptions, objectives, and its business activities. It should attempt to apply a relevancy test to the current beliefs and practices that guide the organization towards offering the best product/services possible. Then the organization should look at them in response to growing trends in the industry, which may offer some good insight into identifying future needs.

(4)   Whatever continuous improvement practices an organization adopts, the need exists that they not only be reactive, but pro-active as well. It is therefore important that these pro-active (strategic) practices be incorporated into the ATO's governance policy and management review activities.

19.0   DESIGNATED MANAGERIAL POSITIONS

(1)   *Subsection* 3.2.1.14 of the *CARs* obligates ATOs to appoint qualified and competent people to specific *designated* managerial positions. This is based upon the need for the company to possess a managerial construct that is based upon best quality assurance practices, which provide for distinct areas of responsibility and unfettered lines of communication to the organization's responsible executive. In other words, the Manager, Quality Assurance reports directly to the boss and is unencumbered by operational constraints. The Manager, Instructional Services enjoys a similar reporting arrangement to ensure operational realities can be properly addressed.

(2)   Despite the fact that these positions are identified by a specific title, it is not [BAG STATE]'s intention to dictate the actual organizational makeup or nomenclature of your company. What is important, though, is the need for the roles and responsibilities of these positions to be fulfilled by capable individuals who understand their significance to the organization and its continued certification, as required by the *Civil Aviation Regulations.* It is also important that your company understand the need that the names of those currently appointed individuals to those designated positions and their contact details are made known to [BAG STATE].

(3)   At the risk of over-simplification, perhaps the designated managerial positions of an ATO can best be summed up as:

(a)   The Director of Training is the responsible executive who is expected to exercise overall authority over the organization's activities, policies, practices, and procedures, and the continued well-being of its certificate;

(b)   The Manager, Quality Assurance is responsible for the day-to-day regulatory compliance of the ATOs activities and the effective consistent application of best quality assurance practices;

(c)   The Manager, Instructional Services is responsible for the day-to-day provision of authorized training activity, which is consistent with expected organizational and regulatory standards of excellence; and

(d)   The Maintenance Manager, when applicable, is responsible for the day-to-day provision of aircraft maintenance activities, which meet the regulatory requirements of the CARs and organizational expectations.

20.0   TRAINING ACTIVITIES – AUTHORIZED TRAINING PROGRAMS

(1)   Approved training organizations must have their intended training programs reviewed by [BAG STATE] prior to commencing the proposed course. Once it has been established that the

program meets all regulatory requirements, authority to conduct the training will be forthcoming and will be indicated on an amended certificate. It is noteworthy that, unlike an air operator's training program, [BAG STATE] will not "approve" an ATO's proposed training programs. [BAG STATE] will only determine whether the program is compliant or not …its effectiveness and the overall acceptance of the program itself will be guaranteed by the training provider's quality systems approach to doing business.

(2) It should be pointed out that Subsection1.3.3 of the CARs makes it an offence for an ATO to conduct any training course that does not appear on their certificate and is subject to a fine of up to $25,000 for a first time offence. Caution should be exercised, therefore, to provide [BAG STATE] with sufficient lead-time to review the program for regulatory compliance prior to the intended start date of the training.

(3) With respect to obtaining authority to conduct Multi-crew Pilot Licence (MPL) training, applicants need to thoroughly review the most current edition of the *Multi-crew Pilot Licence Training Program Guide*. The authorization requirements of this new competency-based approach towards preparing ab-initio pilots for a professional aviation career in the airlines are substantial. Furthermore, the guidance documentation and supporting departmental instructions will be under constant refinement for some time to come, until [BAG STATE]'s MPL regulatory environment reaches full maturation.

(4) ATOs requesting authority to conduct a new training program must provide a completed application form for a certificate amendment by using the form attached in Appendix B of this document, along with a copy of their proposed syllabus to [BAG STATE]. These can be submitted either electronically or through the use of traditional mail services.

21.0   TRAINING ACTIVITIES – FLIGHT SIMULATION TRAINING DEVICES

(1) Flight Simulation Training Devices (FSTD) includes full flight simulators and non-motion flight training devices. Many ATOs will use FSTDs in support of their training programs. When seeking authorization for a training program using FSTDs, you should consider the following points:

   (a) In all cases it will be beneficial and is recommended to discuss FSTD suitability for a specific training program with [BAG STATE] prior to seeking training program authorization;

   (b) In accordance with CAR 606.03 Synthetic Flight Training Equipment, any FSTD used in training, testing, or checking towards any [BAG STATE] pilot licence or rating must have a valid simulator or flight training device certificate, issued by the *Minister* or by a foreign authority with which an agreement with respect to that equipment is in place. [BAG STATE] FSTD qualifications are conducted under the authority of the Manager, National Simulator Program who is also responsible for the acceptance of foreign FSTD qualifications. An FSTD certificate is restricted to the technical qualification of the device and does not infer that the device has been authorized for any specific training program at the ATO;

   (c) The device level generally determines the suitability of the device for a specific type rating training program. Level C and D full flight simulators and supporting appropriate flight training devices will be considered for zero flight time training programs under certain conditions. Others may be authorized where aeroplane flight training is included in the training program;

   (d) Devices used in Phases 1-4 of an MPL program must be suitable in meeting the competency requirements of the individual phase, as proposed by the ATO. Additional information can be found in the *MPL Training Program Guidance* document.

(e)   Equipment used in support of an "alternative means of compliance" program, as discussed in Paragraph 6.2, will be evaluated on a case-by-case basis, depending on the required ou[BAG STATE]ome of the program.   It is imperative to include the proposed use of FSTDs when fulfilling the alternative means of compliance application requirements especially if flight-training credit for the use of FSTDs is desired.

(f)   Where an ATO is offering a traditional Part IV training program (Private Pilot Licence (PPL), Commercial Pilot Licence (CPL), Instrument Rating, e[BAG STATE]., excluding training towards a type rating) the use of approved FSTDs and associated flight credits shall be equivalent to the experience requirements of the applicable licence or rating.

22.0   TRAINING ACTIVITIES – ALTERNATIVE MEANS OF COMPLIANCE

(1)   As stated earlier, a quality systems approach to doing business affords approved training organizations the ability to seek the *Minister's* authority to deviate from certain prescribed regulatory requirements. The successful application to obtain such an authority is dependant upon the ATO undergoing a thorough "proof of concept" trial, which is able to <u>consistently</u> demonstrate that the proposal meets the following objectives:

(a)   Results in improvements in efficiencies or existing outcomes;

(b)   Maintains an equivalent or reduced exposure to risk; and,

(c)   Continues to meet the original intent of the applicable regulations and their associated standards.

(2)   Prior to making application for obtaining an "alternative means of compliance" authority, an ATO will need to be able to establish a number of things, such as:

(a)   Identify the end state objectives of the proposal;

(b)   Quantify the improvement(s) in efficiencies/outcomes being sought;

(c)   Determine the current regulatory impediments to achieving those desired improvements;

(d)   Identify the overriding hazards of their intended proposal and conduct a thorough risk assessment;

(e)   Define the risk controlling measures that must accompany the proof-of concept trial;

(f)   Establish data collection and analysis procedures for the trial;

(g)   Determine if their proposed change(s) still satisfy the perceived intent of the applicable regulations and standards: and

(h)   Draft a plan for a "proof-of-concept" trial that will, in your organization's estimate, demonstrate to the regulator that the proposal consistently meets those requirements listed in the *CARs*.

(3)   Using the form provided in *Appendix C*, the ATO can then make application once they have addressed those issues identified in Paragraph (2). The Commercial Flight Standards Division – Flight Training Group, located at [BAG STATE]'s headquarters in Ottawa, will then review the applicant's proposal. Once it has been established that the submission justifies the dedication of resources to oversee a "proof-of-concept" trial, a meeting will be scheduled to map out the scope and conditions of the trial.

(4)   Since a proof-of-concept trial will be dependent upon the nature of the proposed change and most likely will be different from one submission to the next, the details specific to such an undertaking are not addressed in this guide.

23.0   TRAINING ACTIVITIES – TRAINING SERVICES AGREEMENTS

(1)   It is well understood that certain circumstances may make it attractive for an ATO to enter into a training services agreement with a third party to provide equipment, facilities, and/or personnel in support of authorized training activities. CAR 3.2.1.21 stipulates the conditions under which an ATO can enter into such an agreement with another party.

(2)   There are some key issues that you need to keep in the forefront when you are composing your request-for-proposal (RFP) documentation or negotiating the provision of those services with potential bidders. Some of those involve the need to:

   (a)   Finalize a written contractual commitment on the conditions and expectations regarding levels of service, deliverables (outputs), and desired outcomes;

   (b)   Include the training services agreement related-activities within your quality system processes and procedures; and,

   (c)   Ensure that your organization retains overall control over the integrity of your authorized training programs and your regulatory compliance requirements.

(3)   Subparagraph (2)(c) may pose some very interesting contractual challenges. Consider this example: a foreign-based company providing contracted ground-school instructional support for Phase IV of your authorized MPL training program at their location. How are you going to capture all of your QS obligations? Furthermore, since the foreign-based company may not fall under the jurisdiction of [BAG STATE], how are you going to guarantee to the regulator unfettered access for compliancy oversight duties?

24.0   [BAG STATE] – OVERSIGHT

(1)   Once full certification has been achieved, [BAG STATE] will have a high degree of confidence that the approved training organization's quality system will ensure the continued regulatory compliance of all authorized training activity. Notwithstanding, [BAG STATE] will be alert to organizational behavioural or environmental changes that may present an unanticipated challenge that could tax your current system's design. Should an ATO feel that such a condition has arisen, it would be prudent for them to consult their [BAG STATE] principal operating inspector (POI).

(2)   It should be pointed out that Subsection 3.2.1.11(A)(4)) obligates an ATO's Director of Training to notify [BAG STATE] of any temporary or permanent revocation, or suspension action taken by any other National Aviation Authority (NAA) which impacts the organization's ability to provide previously authorized training services. Not to do so within five working days will likely result in fines being imposed.

(3)   For those ATOs located in [BAG STATE], it should be expected that an inspector Principal Operations Inspector (POI) from the local [BAG STATE] regional office would be assigned for the on-going regulatory oversight program.

APPENDIX A – APPLICATION FOR AN ATO CERTIFICATE

[BAG STATE] File N°

Application for a Certificate for an Approved Training Organization

Legal Name of Company -	**Trade Name -**	**Date** (yyyy/mm/dd)

Location of Business Office	**Mailing address (if different from location business office)**

Location of Main Training Facility:

Location of Sub-bases:

Third-party training service agreements: **Yes** ☐ **No** ☐   If **Yes**, please indicate in Training Provider column below.

Name of Director of Training:	**Name of Accountable Executive** (if applicable):
Contact number:	Contact number:
Name of Manager, Instructional Services:	**Name of Manager, Maintenance:** (Applicable only for an ATO-OC)
Contact number:	Contact number:
Name of Manager, Quality Assurance:	
Contact number:	

Type of Training	**Date of Commencement of Training** (yyyy/mm/dd)	**Name of Training Provider** (If contracted out)	**Equipment List**	
			Aircraft Type Utilized	**Device Type Utilized**
☐ Type Rating Training				
☐ MPL Phase I				
☐ MPL Phase II				
☐ MPL Phase III				
☐ MPL Phase IV				
☐ ATPL (A) Integrated				
☐ CPL (A)/IR				
☐ Other:				

Risk profile attached: Yes   No

Risk management plan completed: Yes   No

Quality assurance policies and procedures established: Yes   No

Organizational training plan established: Yes   No

Documentation management
policies and procedures established: Yes   No

APPENDIX B – APPLICATION FOR AN AMENDMENT TO A CERTIFICATE

	Transport Transports Canada Canada	**Existing Certificate N°**

Application for an AMENDMENT to a Certificate for an Approved Training Organization

Legal Name of Company -	**Trade Name -**	**Date** (yyyy/mm/dd)
Location of Business Office -	**Mailing address (if different from location business office) -**	

*NOTE : PLEASE FILL IN ONLY THOSE AREAS AFFECTED BY CHANGE.

Location of the main training facility:……

Location of Sub-bases:……….

Third-party training service agreements   Yes ☐   No ☐   If **Yes**, please indicate in Training Provider column below.

Name of Director of Training : Contact number :	**Name of Accountable Executive** (if applicable)**:** Contact number :
Name of Manager, Instructional Services: Contact number:	**Name of Manager, Maintenance:** (Applicable only for an ATO-OC) Contact number:
Name of Manager, Quality Assurance: Contact number :	

Changes to Types of Training	**Removed or cancelled training**	**Additional training**	**Date of commencement**	**Name of New Training Provider** (If contracted out)	**Changes to Equipment List**		**New Syllabus submitted**
					Aircraft Type Utilized	**Device Type Utilized**	√
☐ Type Rating Training							
☐ MPL Phase I							
☐ MPL Phase II							
☐ MPL Phase III							
☐ MPL Phase IV							
☐ ATPL (A) Integrated							
☐ CPL (A)/IR							
☐ Other Courses:							

APPENDIX C – APPLICATION FOR AN ALTERNATIVE MEANS OF COMPLIANCE

Certificate N°

Approved Training Organization's Application for an Alternative Means of Compliance

Legal Name of Company -

Describe proposal :

Identify the impediment of the current regulation/standard:

Quantify expected improved results :

Risk assessment complete: Yes ☐ **No** ☐

Identify the overriding hazards:

Define risk controlling measure(s) :

Briefly describe proof of concept trial :

APPENDIX D – EXAMPLE OF AN ATO CORRESPONDENCE MATRIX

Regulatory Requirement	Objectives	Applicable Standards	Conformity Process	Office of Primary Interest	Comments on Conformity
Quality System	- Identify and mitigate risk - QC, QA, & continuous improvement practices - Continuous compliance with [BAG STATE] standards and other regulations applying to clients - Record retention safeguards from premature data removal (2 Years from last entry)	-Initial post- certificated audit within 12 months -Targeted periodic audits -Audit communication protocols - Assessment practices of corrective action	- Published CEO policy statement on commitment to QS - QS Procedures Manual – Chapter 3, Internal Audits & Organizational Risk Profile, Revision 12 - QS Procedures Manual – Chapter 4, Audit Reports - QS Procedures Manual – Chapter 5, Corrective Action	Manager, Quality Assurance	- Conducted organizational post-certificated audit, 12 April 2011, attached as Appendix A - First targeted audit scheduled Jul 2011 - Organizational Risk Profile updated following
Training Agreements	& agreed upon deliverables -Regulatory compliance responsibility not transferred - Agreement does not contract out checking and testing responsibilities	- Represents a clear, concise, legal written transaction detailed in TCM -ATO remains responsible for program integrity and regulatory compliance	- Training services agreement (TSA) vetted by ATO regulatory compliance department - Agreement detailed in Training Control Manual (TCM) - QS Procedures Manual - Chapter 8,	Director of Training	- Risk Profile updated - Targeted performance and compliance audits randomly conducted on contract instructors

Intentionally left blank.

Intentionally left blank.