Hellenic Civil Aviation Authority Flight Standards Division Licensing Section

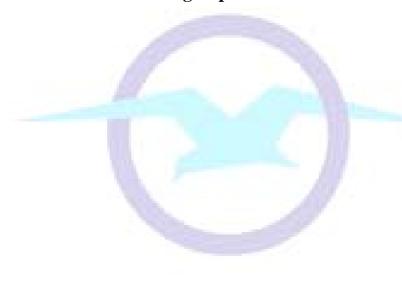


## **ATO Approval Procedures**

Standard Document, Version 1



Present documentation is subject to revision as information is disseminated by the European Aviation Safety Agency and departments within the HCAA Licensing Department.



0	PART 1 - GENERAL	7
1	INTRODUCTION	7
1.1	CURRENT LEGISLATION AND STATUS	7
1.2	TRANSITION PERIOD AND GRANDFATHER RIGHTS	8
1.3	PURPOSE OF THIS PROCEDURE	8
1.4	NATIONAL LICENSE OR TYPE RATING COURSES	8
1.5	ORGANIZATIONS GENERAL	9
2	BLICENSING INSPECTORC APPROVAL / ACCRED. PROCESS FOR ALL APPLICANTS	
2.1	PRIOR TO APPLICATION	10
2.2	APPROVAL OF FLT TRAINING. ORGAN. IN A NON-EASA STATE	10
2.3	OVERSEAS TRAINING	10
3	PREP. FOR INITIAL APPVL. OR VARIAT. TO AN EXISTING APPRVL	
3.1	TIMESCALES AND SCHEME OF CHARGES	.10
3.2	LANGUAGE	10
3.3	ITEMS REQUIRED FOR SUBMISSION FOR INITIAL APPLIC.	11
3.4	ADDITIONAL ITEMS IN SUPPORT OF INITIAL APPLICATION	
3.5	CONTRACTED ACTIVITIES	
4	PROGRESS OF AN APPLICATION	12
4.1	ALLOCATION OF AN AVIATION SAFETY INSPECTOR (LICENSING)	
4.2	INCOMPLETE APPLICATIONS	12
4.3	REVIEW OF MANUALS, EXAMINATIONS AND SUPP. DOCUMENT	13
4.4	INSPECTION OF FACILITIES	13
4.5	PURPOSE OF THE INSPECTION	
4.6	CONDUCT OF THE INITIAL INSPECTION	13
4.7	POST-INSPECTION	14
4.8	FOLLOW-UP ACTIONS	14
4.9	FINAL ATO APPROVAL	14
4.10	APPROVALS CERTIFICATE	.15
5	CONTINUED OVERSIGHT	15
5.1	OVERSIGHT PLANNING CYCLE	15
5.2	CONTINUED OVERSIGHT INSPECTIONS	15
5.3	DESK-TOP AUDITS	16
5.4	TEST & EXAMINATION SUCCESS-RATE MONITORING	16



5.5	SAMPLING OF TRAINING	16
5.6	PERSONNEL CHANGES	16
5.7	KEY PERSONNEL	16
5.8	OTHER CHANGES TO THE ORGANIZATION	17
5.9	CORRESPONDENCE WITH THE HCAA	17
6.	REVOCATION/ SUSPENSION / VARIATION / LIMITATION	17
6.1	NON-COMPLIANCE	17
7	CONTINUATION OF APPROVAL	18
7.1	APPROVAL CERTIFICATE	18
8	PART 2: SPECIFIC AREAS OF GUIDANCE OR REFERENCE	18
8.1	HEAD OF TRAINING	19
8.2	CHIEF FLIGHT INSTRUCTOR	19
8.3	CHIEF THEORETICAL KNOWLEDGE INSTRUCTOR	19
8.4	COMPLIANCE MONITORING MANAGER	19
9	STUDENT: FLIGHT INSTRUCTOR RATIO	19
10	FLIGHT INSTRUCTORS	19
10.1	INSTRUCTORS COURSE	19
10.2	FLIGHT INSTRUCTORS REQUIREMENTS & PREREQUISITE	20
10.3	INSTRUCTOR – RESTRICTED PRIVILEGES	20
10.4	FLIGHT INSTRUCTORS HOLDING NON EASA QUALIFICATIONS	20
11	THEORETICAL KNOWLEDGE INSTRUCTORS	21
12	TRAINING STANDARDS	21
13	FLIGHT TIME LIMITATIONS	21
14	RECORDS	21
14.1	CONTENT OF RECORDS	21
15	COURSE COMPLETION CERTIFICATES	23
16	TRANSFER OF STUDENT RECORDS	23
17	PERSONAL FLYING LOG	24
17.1	CONTENT AND CERTIFICATION	24
17.2	INSTRUCTORS LOGBOOKS	24
18	TRAINING PROGRAM (S)	24
18.1	CRITERIA AND DETAIL FOR TRAINING MANUAL	24
18.2	CRITERIA DETAIL FOR OPER/NS MANUAL	24

TEL LIVING DE COELLA (C. COLTENIA)
TRAINING PROGRAM (S) CONTINUED
SUMMARY TABLE OF REFERENCES
FLIGHT AND SYNTHETIC FLIGHT TRAINING
SKILL TEST
CREDITS29
FLIGHT INSTRUCTION ON A IRI (H) COURSE
THEORETICAL KNOWLEDGE INSTRUCTION29
SYLLABUS29
REFERENCE LIBRARY AND DEMONSTRATION EQUIPMENT29
STUDENT NOTES AND LEARNING OBJECTIVES29
COMPUTER BASED TRAINING30
EXAMINATIONS30
CLASS AND TYPE RATING EXAMINATIONS
TRAINING PROGRAM30
PROVISION OF MEP CLASS AND TYPE RATING THEORETICAL
KNOWLEDGE EXAMS
THEORETICAL KNOWLEDGE INSTRUCTION – GENERAL
QUESTION PAPER
ANSWER SHEET
FRAMING OF QUESTIONS
MCC TRAINING
MCC INSTRUCTORS
MCC THEORETICAL KNOWLEDGE
MCC PRACTICAL TRAINING
TRAINING AIRCRAFT
INTERNAL PROCEDURE FOR APPROVAL OF AIRCRAFT35
DOCUMENTS AND MANUALS
CRITERIA FOR AIRCRAFT36
TECHNICAL LOGS AND AUTHORIZATION OF FLIGHTS36
CHANGES TO THE FLEET
FLIGHT SIMULATION TRAINING DEVICES
DEVICE QUALIFICATION AND USER APPROVAL37
TRAINING SYLLABUS
AERODROMES AND OPERATING SITES



25.1	UNLICENSED AERODROMES	38
25.2	AIR TRAFFIC CONTROL DURING FLIGHT TRAINING	39
25.3	USE OF NON-APPROVED AERODROMES	39
25.4	USE OF OVERSEAS AERODROMES	39
26	FACILITIES FOR FLIGHT OPERATIONS AND THEORETICAL KNOWLEDGE INSTRUCTION	
27	OPERATIONAL PUBLICATIONS	40
27.1	REQUIRED PUBLICATIONS	40
27.2	OTHER PUBLICATIONS	40
27.3	GUIDANCE MATERIAL	40
27.4	ELECTRONIC DOCUMENTATION	40
28	TRAINING MANUAL AND OPERATIONS MANUAL	41
28.1	TRAINING MANUAL	41
28.2	OPERATIONS MANUAL	42
29	SAFETY MANAGEMENT SYSTEM	42
29.1	SMS EVALUATION	43
29.2	SMS OVERSIGHT	44
29.3	COMPLIANCE & MONITORING	44
30	REQUIREMENTS FOR ENTRY TO TRAINING	44
30.1	MEDICAL	44
30.2	INTEGRATED COURSES	45
30.3	MODULAR COURSE	45
APPE	NDIX A : SUBMISSION OF ATO MANUALS	46
V DDE.	NDIV B · SAMDLE OF TRAINING CERTIFICATE FOR ATO'S	10

#### 0 PART 1 - GENERAL

The purpose of this Chapter is to provide in D2/B Management, Inspectors and Administrative Personnel guidance for ATO's or persons seeking to apply for Approval as an Approved Training Organization whose principal place of business and registered office are located in the Hellenic Territory.

The procedure describes the sequence of the different steps leading to the initial issue of a ATO Approval Certificate and steps for continue Oversight.

It also offer guidance and information for the benefit of Licensing Inspectors to ensure that an application made for an Approval will satisfy the HCAA D2/B Management that the relevant requirements and standards have been met and thereafter will continue to be met;

Where organizations are not located in Hellas (Greece), and therefore their principal place of business is not in Hellas (Greece), Organizations should apply to either the Competent Authority for the EU State in which they are based or, if they are located outside of an EASA State, the European Aviation Safety Agency.

#### 1 INTRODUCTION

#### 1.1 CURRENT LEGISLATION AND STATUS

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

HCAA expects organizations seeking Approval to be in possession of the latest version of the relevant PART-FCL document (s) and for the Organization's representatives to be familiar with the content of PART- ORA.

The requirements that must be satisfied for Approval to be granted are contained, in broad terms, in the appendices to PART - FCL. Details of course pre-requisites, course content, written examinations and flight tests can be found in other Parts of current Licensing Legislation. Additional information concerning courses is also to be found in PART - FCL in material called Acceptable Means of Compliance (AMC) and Interpretative and Explanatory Material (IEM).

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

On the 8 April 2012 EASA became the Competent authority for Organizations previously approved by Hellas (Greece) HCAA whose principal place of business is located outside of the EU.

Requirements for approval of Approved Training Organizations (ATO) are laid down in the Aircrew Regulation Part ORA and the AMCs to Part ORA. Information regarding the training to be completed for the issue of a License, Rating, Certificate or Authorization is laid down in Part FCL and the AMCs to Part FCL.

The HCAA D2/B have the experience that, considerable resources and effort are required to prepare an initial application for Approval to conduct courses of training, particularly in relation to the development of the required documentation. Equally, the review of such material is both demanding of staff effort within the Personnel Licensing Section and must take its place beside other work undertaken - it is not given special priority against other tasks. Therefore, Organizations should make realistic assumptions from the outset as to how long it



will take to obtain Approval and are strongly recommended to inform the HCAA D2/B of their intentions at an early stage of planning.

It is strongly recommended that Organizations intending to make application for Approval, arrange in the first instance, a personal meeting with Personnel Licensing Section to discuss the detail of the Approval process.

ATO's that were previously Registered Training Facilities (RFs) before 17 September 2012 shall be deemed to hold a Certificate issued in accordance with the Regulations. An RF seeking to change the scope of their certificate or terms of approval must follow the procedure listed at Commission Regulation (EU) No 290/2012 article 10a.

#### 1.2 TRANSITION PERIOD AND GRANDFATHER RIGHTS

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

#### 1.3 PURPOSE OF THIS PROCEDURE

This procedure is intended to serve the following purposes:

- assist new Organization to ensure that an application made for an initial approval will satisfy EASA Part-ORA requirements;
- assist current JAR-FCL organizations ensure that applications to vary their approval will satisfy EASA Aircrew Regulations;
- explain administrative arrangements and legal matters particular to Hellas (Greece);
- ensure the process and procedures are understood by the organizations the HCAA regulates, and to ensure continued compliance and approval as and when there are any appropriate or necessary changes to the organizations; and
- assist RFs seeking to become ATOs gain approval

#### 1.4 NATIONAL LICENSE OR TYPE RATING COURSES

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

Training for National licenses, will continue unaffected by EU Regulations but will be kept under review by the Authority and the Organization sponsoring the training.

#### 1.5 ORGANIZATIONS GENERAL

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

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

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

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

# 2 LICENSING INSPECTOR APPROVAL / ACCREDITATION PROCESS FOR ALL APPLICANTS

#### 2.1 PRIOR TO APPLICATION

The following information should be considered prior to application:

- An ATO is considered to be a single organization staffed, equipped and operated in a suitable environment offering flight training, synthetic flight instruction and/or theoretical knowledge instruction.
- An ATO may be approved to conduct more than one kind of approved training course. However, HCAA will require that arrangements put in place to conduct a combination of courses are satisfactory.
- An ATO contracting activities must meet the requirements of ORA.GEN.205, AMC1 ORA.GEN.205 and GM1 ORA.GEN.205.
- Where training is conducted at multiple locations, all sites will be subject to approval and Oversight.

## 2.2 APPROVAL OF FLT TRAINING ORGANIZATION IN A NON-EASA STATE

A training Organization operating in a non-EASA Member State seeking to become an EASA approved ATO shall make an application in accordance with ORA.GEN.115 and



ORA.ATO.105 using application form "Application for a Part- ORA ATO Approval". This Application form must be sent direct to EASA [Regulation (EC) 216/2008 Article 21(1) (b)] by surface mail, fax or e-mail, (via the email box indicated on the EASA website). The Agency will elect to either carry out the approval activity itself or will allocate the task to the NAA of an EASA Member State which may or may not be Hellenic CAA.

#### 2.3 OVERSEAS TRAINING

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

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

## 3 PREPARATION FOR INITIAL APPROVAL OR VARIATION TO AN EXISTING APPROVAL

#### 3.1 TIMESCALES AND SCHEME OF CHARGES

When making an application for an initial approval, or to vary an existing approval, an ATO should ensure that any documents provided are both complete and accurate. The application material should also clearly demonstrate full compliance with all relevant Part-FCL and Part-ORA requirements.

Applications for courses of type rating training must also demonstrate Compliance with any training requirements identified in the OEB / OSD report for aircraft type concerned. Applications are processed in order of receipt, any omissions or errors in submitted material will delay the approval process.

#### 3.2 LANGUAGE

The HCAA will approve courses prepared and delivered in Hellenic and English language. All course material, including any documentation or records required, shall be in English and / Hellenic.

Training Organizations shall ensure that students, for whom English is a second language, have a comprehensive understanding of spoken and written English before admitting them onto a course.

Where the course is conducted in a non-English speaking State, the HT shall ensure, before the commencement of the course, which students are capable of understanding and interpreting Aeronautical and other information promulgated by or on behalf of that State, concerning Flight Safety or related to the conduct of the course.

## 3.3 ITEMS REQUIRED FOR SUBMISSION FOR INITIAL APPLICATION

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

- Confirmation of Legal Entity of the applicant Organization e.g. a copy of the Company registration document for limited and public limited Companies.
- Relevant and signed application form
- Relevant application fee (if and where applicable) will be detailed in the HCAA site
- Key Nominated Personnel forms with CVs detailing relevant experience
- HCAA checklist for Operations Manual
- HCAA checklist for Training Manual
- Proof of availability of aircraft, FSTD, facilities and staff for the approved courses to be conducted. Where these are not permanently available to the ATO, copies of Hire Agreements, contractual arrangements etc. must be provided.

#### Evidence of sufficient funding comprising of

- Current balance sheet
- > Signed statement from company accountants
- ➤ 3 year business plan, with month by month breakdown of projected income and expenditure
- Copies of FSTD qualification certificates
- Theoretical Knowledge Instructor/ Subject allocation (primary and secondary subjects)
- All manuals should have an effectual means of document control and a list of effective pages

It is important that ATO's provide a single email address to be used for all communication between the Authority and the organization.

# 3.4 ADDITIONAL ITEMS IN SUPPORT OF INITIAL APPLICATION

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

- A detailed Management structure. ORA.GEN.200
- Personnel requirements. ORA.GEN.210 and ORA.ATO.110.
- A description of the accommodation; a floor plan with dimensions and purpose of individual rooms is usually appropriate. AMC1-2 0RA.GEN.215
- Description of the training program which must comply with the requirements of Part-FCL and, in the case of flight test training, the relevant requirements of Part-21. ORA.ATO.125, AMC1 ORA.ATO.125, AMC2 ORA.ATO.125, AMC3 ORA.ATO.125.
- The means of conducting PPL and LAPL Theoretical Knowledge Examination
- Samples of documentation relating to proposed courses and the training and checking forms detailed in the Training Manual, with evidence of an updating system are to be provided. The person responsible for maintaining and checking records, licenses and log books should be named and the frequency of record checks is to be stated. It should be

demonstrated that arrangements have been made for the security of records and documents and evidence of standardization of entries in training records is to be shown.

Training effectiveness acc.to AMC1 ORA.ATO.230 (a) (10).

#### 3.5 CONTRACTED ACTIVITIES

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

- Contract the activity to an organization that is itself certified (i.e. under an EASA Implementing Rule) to carry out the activity; or
- If an organization is not certified to carry out the activity, it must work under the contracting organizations approval i.e. under the approval of the organization that is certified and which is contracting out the relevant activity.

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

### 4 PROGRESS OF AN APPLICATION

# 4.1 ALLOCATION OF AN AVIATION SAFETY INSPECTOR (LICENSING)

When a complete application has been received from Licensing D2/B Department, with relevant application form, fees if applicable, manuals and all other associated documentation, an Licensing Inspector will be assigned from D2/B Head of Department to oversee the application process and review the relevant documentation. An Approval coordinator may also be assigned from D2/B who will be the point of contact for any items submitted in respect of the application; the coordinator will record any items submitted and ensure these are tasked to the relevant Inspector.

#### 4.2 INCOMPLETE APPLICATIONS

Where incorrect or incomplete information is supplied, the Licensing Dept. shall notify the applicant as soon as reasonably practicable by letter or email detailing the error or omission.

# 4.3 REVIEW OF MANUALS, EXAMINATIONS AND SUPPORTING DOCUMENTATION

Before submitting manuals, organizations should complete the appropriate Manual Checklist and submit to the Authority as part of the application.

A manual report will be raised following a review of documentation by the Licensing Inspector to be forwarded for reference and relevant action to the applicant Organization.

Manuals put forward for initial approval should submitted in paper copy. Once approved an electronic version in a single PDF or DOC (word) file should be submitted for entry into the Licensing hard-copy & electronic document library of the Inspector.

#### 4.4 INSPECTION OF FACILITIES

Prior to the initial Inspection being carried out, an Audit of the entire training Organization shall be performed through the applicant's internal Compliance & Monitoring system to ascertain Compliance with all applicable requirements related to the requested scope of the approval. When the internal Compliance Audit has been completed and all findings and issues addressed, a statement of Compliance signed by the Organization's Accountable Manager shall be provided before the Technical Inspection takes place. The statement of Compliance shall confirm that the documents, procedures, facilities, equipment and personnel comprising the application have been reviewed and Audited and that the findings have been properly addressed so that the whole Organization demonstrates full Compliance with all applicable requirements.

#### 4.5 PURPOSE OF THE INSPECTION

The purpose of the visit is to meet the Nominated Personnel, confirm the suitability of the facilities to be used for training, including any aircraft and FSTDs, and confirm the suitability of the applicant's Management System (incorporating a Compliance- Monitoring system and Safety Management System) to ensure continued Compliance with the regulations in Part-FCL and Part-ORA.

#### 4.6 CONDUCT OF THE INITIAL INSPECTION

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

- An Opening Meeting with the Nominated Personnel and the Accountable Manager. This allows the Inspector to meet the key Management Personnel in the proposed ATO, discuss the application, and explain the scope of the visit. The visit schedule will also be explained.
- The Audit of the proposed ATO including:
  - ➤ A tour of the proposed ATO facilities, including any aircraft and FSTDs.
  - ➤ Interviews with Nominated Personnel and key Management personnel (including Head of Training and Compliance Monitoring Manager) and, if present, the Accountable Manager.
  - ➤ Examination of the proposed ATO's detailed Management structure, including names and qualifications of personnel (as required by ORA.GEN.210) and the adequacy of the Organization and Management structure.



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

HELLENIC CIVIL AVIATION AUTHORITY ΥΠΗΡΕΣΙΑ ΠΟΛΙΤΙΚΗΣ ΑΕΡΟΠΟΡΙΑΣ

- Examination of the proposed ATO's Training & Administrative Staff qualifications, Licenses, Certificates and Ratings.
- Examination of the proposed ATO's processes for Safety Risk Management and Compliance Monitoring, including full documentation of internal Audits (ORA.GEN.200 & associated AMC & GM).
- A Closing Meeting, again with the Nominated Personnel, and the Accountable Manager, during which the Licensing Inspector will discuss the Audit, including any areas which do not conform to the Regulatory Requirements. Any required remedial action by the proposed ATO can be discussed with the LICENSING INSPECTOR at this stage.

A suitable room should be allocated for the Inspector to conduct his/her Audit, and the required documentation should be prepared in advance and made available to the LICENSING INSPECTOR in this location on commencement of the Inspection.

#### 4.7 POST-INSPECTION

The Inspector will record the findings of the Initial Inspection on a standard ATO Approval Certification form and record the time of expiration for ATO's rectification action. A re-evaluation of the areas corrected will be inspected in sight of the Organization except where documentation proof of rectification was applied at offices of D2/B.

#### 4.8 FOLLOW-UP ACTIONS

Where the outcome of the Initial Inspection is deemed unsatisfactory, and the proposed ATO has been found to be non-Compliant with the Regulatory Requirements in any area, then the ATO will be instructed of the sectors to be reconstructed and reevaluated .The HCAA will point the area (s) concerned, the associated Part-ORA reference, the Level of Finding (see ARA.GEN.350), and the Corrective Action required by the proposed ATO. Proposed ATOs will be required to submit a Corrective Action Plan, acceptable to the LICENSING INSPECTOR, to correct any non-Compliant areas before the LICENSING INSPECTOR can recommend Approval.

#### 4.9 FINAL ATO APPROVAL

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

Once final approval has been given, the ATO Approval Certificate will be issued by HCAA Licensing Section.

#### 4.10 APPROVALS CERTIFICATE

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

#### 5 CONTINUED OVERSIGHT

Once an ATO has been issued with initial Approval it is subject to continued Oversight by D2/B (ARA.GEN.300, ARA.GEN.305 and ARA.ATO.105). This Oversight includes Audits and Inspections, including ramp and unannounced Inspections as appropriate, and meetings between the Accountable Manager and the Competent Authority to ensure both remain informed of significant issues.

#### 5.1 OVERSIGHT PLANNING CYCLE

The interval between Oversight Inspections (Oversight planning cycle) is established by the HCAA D2/B using risk-based criteria, including change volume and range of activity, ATO size and complexity, and the effectiveness of the ATOs Management system. The Oversight planning cycle will not normally exceed 24 months; for new ATOs this timescale runs from the date of initial Approval. However, new ATOs may be subjected to a first Oversight Inspection at a much shorter interval to enable the D2/B to check the effectiveness of the Management system (including internal Audits) and to observe training taking place. The D2/B is able to extend the Oversight planning cycle where it deems appropriate, but only under the conditions listed in Part-ARA (ARA.GEN.305).

#### 5.2 CONTINUED OVERSIGHT INSPECTIONS

Continued Oversight Inspections follow a similar pattern to the initial Inspection listed at 4.6. However, the ATO will be expected to have extensive records of all internal Audits available, particularly those subsequent to Approval, as well as comprehensive student training, staff training and standardization records. During Oversight Inspections, significant emphasis of Licensing Inspector (s) will be placed on the effectiveness of the ATO's Management system, including internal Audits, Safety Management and Compliance Monitoring; it is therefore essential that key Management system personnel, e.g. Compliance Monitoring Manager, are available during the Inspection.

#### 5.3 DESK-TOP AUDITS

At any stage of the Oversight planning cycle, and in accordance with ORA.GEN.140 (Access) the allocated Licensing Inspector may request that copies of internal Audits and other records relevant to its activities be forwarded to D2/B. The allocated Licensing Inspector will then use this data as a base data for a desk-top Audit at D2/B forming part of the continuous Oversight of the ATO, including a risk-based assessment of the next due date for Inspection of the ATO (see 5.1).



#### 5.4 TEST & EXAMINATION SUCCESS-RATE MONITORING

Following initial approval of an ATO, the HCAA D2/B will monitor the results of tests and examinations forming part of the approved course. The success-rate of course graduates obtaining first-time passes in the CPL and IR Skill Tests will also be monitored.

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

#### 5.5 SAMPLING OF TRAINING

The Licensing Inspector will sample training at various stages of the Oversight planning cycle. During Inspections, ATO's can expect the Licensing Inspector to observe actual Theoretical Knowledge Instruction and aircraft or simulated flight training, including preflight and post-flight briefings. The Licensing Inspector will aim not to disrupt or cause distraction during any observation of training. Observation of training may also be carried out by HCAA Flight Examiners and Flight Crew Standards Inspectors on behalf of D2/B Department.

Training records of students / Training / Administrative Personnel and standardization records will also be sampled during an ATO Inspection, and must be made available to the Licensing Inspector under ORA.GEN.140.

#### 5.6 PERSONNEL CHANGES

The Organization must at all times ensure that they have sufficient qualified Personnel for the planned tasks and activities to be performed in accordance with the applicable requirements. Where there is any change to numbers and availability of Training and Administrative Personnel, this should be discussed with the allocated Licensing Inspector, to ensure continued Approval for training and /or Compliance with the regulations, Part-ORA.GEN.210, Part-ORA.ATO.110.

#### 5.7 KEY PERSONNEL

It will be a condition of the Approval that whenever an approved Nominated Personnel or Manager (Accountable Manager, HT, CFI or CTKI) leaves an ATO the Organization will contact D2/B to suspend their approval until the position has been filled or under an alternative arrangement approved by the D2/B.

If a key Nominated Person at an ATO providing Modular, Type Rating or Theoretical Knowledge Training leaves the Organization, an alternative Nominated Person may, on Approval of Licensing Inspector, be able to assume both positions. However, this will only be approved if the existing Nominated Person is qualified to hold the other position as well. The position of HT, CFI and CTKI may be combined and filled by one or two persons with extensive experience in the training conducted by the ATO, full or part-time, depending on the scope of training offered.

Prior Approval of key Nominated Personnel must be sought from the HCAA before appointment in order to enable the D2/B to determine continued Compliance.

All nominations for Nominated Personnel should be made using form HCAA PART-FCL FORM.142 for Part-ORA Approved Organizations. It is recommended these Nominations must be made at least 10 days before the date of the proposed change of position (AMC 1 ORA.GEN.130).

#### 5.8 OTHER CHANGES TO THE ORGANIZATION

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

For other changes, please refer to Parts ORA.GEN.130 and ARA.GEN310(c) which give details of the mechanism by which the D2/B may allow an ATO to make certain changes without prior approval. All amendments to Approved Manuals with changes shown, must be submitted to the D2/B for hard-copy and electronic storage and further approval.

#### 5.9 CORRESPONDENCE WITH THE HCAA

Following the grant of Initial Approval the HCAA's D2/B stated method of communication with Organizations is by email, however other way where proof of communication exists may be accepted. It is therefore important that a single email address be provided which is suitable for this purpose and that any changes are promptly sent to Licensing Dept. It will be assumed that the e-mail address provided on the latest application form to the HCAA is the current e-mail address to be used.

#### 6. REVOCATION/SUSPENSION/VARIATION/LIMITATION

#### 6.1 NON-COMPLIANCE

In cases of any significant non-Compliance with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the Organization's procedures or Manuals, or with the terms of an Approval or Certificate, which reduces Safety or seriously hazards Flight Safety (refer to ARA.GEN.350(b) and/or ARA.GEN.330(b)) the D2/B Department will raise a Level one (1) finding. Under ARA.GEN.350 (d) (1), and following a Level 1 finding, the HCAA D2/B can take immediate and appropriate action to prohibit, limit or suspend activities of an Organization which Approved under the EASA Aircrew Regulation. When any non-Compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the Organization's procedures and Manuals, or with the terms of an Approval or Certificate which could reduce Safety or hazard Flight Safety, as indicated in ARA.GEN.350 (c), D2/B will raise a Level 2 finding.

A National Approval issued by the HCAA D2/B may be revoked, suspended or varied where the requirements cease to be met in part or in whole, or where the standards on which the Approval was granted are not maintained. Should there be a failure to meet the requirements or standards, the Organization will be formally notified of the non-Conformity (s) and remedial action will be identified and agreed to be taken within a specified time. Should the



Organization fail to meet the standards in the specified time, revocation, suspension or variation of the Approval will be considered and, if appropriate, the approval will be revoked, suspended or varied.

The Organization has a right of review in respect of a proposed decision to revoke, suspend or vary a National Approval.

The HCAA may, subject to article 14 (1) of the Regulation (EC) 216/2008, provisionally suspend an EASA ATO approval, pending inquiry into or consideration of the case.

#### 7 CONTINUATION OF APPROVAL

#### 7.1 APPROVAL CERTIFICATE

Under EASA Aircrew Regulations an Approval Certificate issued to a training Organization is non-expiring and will remain current provided the privileges and scope of the activities that the Organization is approved to conduct does not change.

For continued Oversight of an Organization, the HCAA D2/B will follow the procedure detailed at Part-ARA.GEN.305.

#### 8 PART 2: SPECIFIC AREAS OF GUIDANCE OR REFERENCE

#### **Management and Nominated Personnel**

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

All Key Personnel Nominated from the Organization must be accepted and may be interviewed from the HCAA D2/B by submitting the relevant form and be formally agreed by the HCAA before the Nomination is made substantive. Current key Nominated Personnel who do not meet the EASA requirements may continue in post, however, any key Person who moves to another ATO, or new applicants in an Organization must meet all of the EASA requirements.

#### 8.1 HEAD OF TRAINING

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

#### 8.2 CHIEF FLIGHT INSTRUCTOR

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

#### 8.3 CHIEF THEORETICAL KNOWLEDGE INSTRUCTOR

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

#### 8.4 COMPLIANCE MONITORING MANAGER

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

#### 9 STUDENT: FLIGHT INSTRUCTOR RATIO

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

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

#### 10 FLIGHT INSTRUCTORS

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

#### 10.1 INSTRUCTORS COURSE

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

# 10.2 FLIGHT INSTRUCTORS REQUIREMENTS & PREREQUISITE

References for the requirements and prerequisites for Flight Instructors can be found where table below directs to:

Instructor	Reference
FI certificate requirements	Part-FCL.900



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

#### 10.3 INSTRUCTOR – RESTRICTED PRIVILEGES

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

# 10.4 FLIGHT INSTRUCTORS HOLDING NON EASA QUALIFICATIONS

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

The training of non EASA instructors may be conducted within an ATO provided the ATO holds an FI approval, by an EASA qualified FI within the privileges to conduct FI Courses. On completion of the training the candidate shall pass an assessment of competence with either a FIE or a HCAA Aviation Safety Inspector (licensing).

#### 11 THEORETICAL KNOWLEDGE INSTRUCTORS

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

As it concerns class size: AMC1 ORA.ATO.210 (f).

Theoretical Knowledge Instructors must be employed to ensure the proper continuity of Theoretical Knowledge Instruction for all students attending the courses.

### 12 TRAINING STANDARDS

CFI is responsible for the supervision of flight and flight simulator training instructors and for their standardization.

The Operations Manual shall describe the process and procedure to be used to achieve these requirements. See ORA.ATO.230.

#### 13 FLIGHT TIME LIMITATIONS

ATO Operations Manual shall detail flying duty periods and flight time limitations for instructors.

See also AMC1 ORA.ATO.230 (b) Training Manual and Operations Manual.

Instructor's logbooks have to include a monthly summary of all flying.

#### 14 RECORDS

Accordingly to the size & scope of the operation, Administrative Personnel should be provided by Organization Management to accomplish the routine administration of courses. (ORA.GEN.220 and AMC1 ORA.GEN.220 (b): details of record keeping).

The Head of Training or the Nominated person shall be responsible for ensuring adequate records -acceptable to the HCAA- are maintained in respect of the flight, theoretical knowledge and synthetic flight training undertaken.

#### 14.1 CONTENT OF RECORDS

The form and content of student training records are specified in the Training Manual in a way that will be acceptable to the HCAA and appropriate to the courses conducted.

#### The records are to include:

- Personal details of each student, including name, address, telephone contact number (s), HCAA reference number, next of kin details, previous experience and evidence of all preentry requirements (for example copies of license/rating pages, theoretical knowledge exams passed, course completion certificates, copies of Skill Test form, medical certificates), and qualifications including a summary of any credit to which the student may be entitled and an assessment of his/her suitability to undertake the course;
- A cumulative record of theoretical knowledge lessons attended by subject;
- Regular reports by subject with the instructor's name and written comments by the instructor on the student's performance and progress and other factors such as attitude and manner during individual lessons and during the course as a whole. Students should be invited to sign each report acknowledging its contents;



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

#### Students are required to sign each report acknowledging the debrief

- A summary of flying exercises completed with the date on which each exercise was carried out in the air or in a FSTD;
- Relating to the student's progress, summary reports and the result of progress / phase tests, skill tests and Theoretical Knowledge Examinations including arrangements for remedial training after failed tests/examinations;
- Training in aircraft Emergency Procedures, to be recorded separately and displayed prominently.
- All records shall indicate the date training commenced and the date of completion. Where students do not complete the course the record shall indicate the circumstances under which training ceased. The students overall performance and attitude to training should be summarized on completion or termination of the course.
- It is advisable that for all integrated courses, or any course requiring solo flying, a medical certificate must be obtained before the commencement of training.
- Training records are to be made available to examiners prior to test in accordance with Part-FCL.030 (b).

Record-keeping system: AMC1 ORA.GEN.220 (b) & AMC1 ORA.ATO.120 (a);(b).

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

#### 15 COURSE COMPLETION CERTIFICATES

On satisfactory completion of a course of instruction, the trainee is to be awarded a Certificate of Course Completion [such as Student's Personal details, ground course duration, flight hours training (with specification for IR, solo, PIC, etc), MCC course dates and durations, FSTD hours, and in general every aspect relating to the specific course followed as described in EC 1178/2011 and according to the administration procedures to be

followed described in EC 290/2012] signed by the HT, CTKI, or nominated deputy. An example of the certificate is to be included in the Training Manual.

Persons within an ATO who are Authorized by the ATO to sign Course Completion Certificates should be named in the Operations Manual. The ATO should also document in the Operations Manual the method, including any questions, experience or training deemed necessary, it will use in order to authorize persons to carry out this task.

#### 16 TRANSFER OF STUDENT RECORDS

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

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

- The new ATO must have a copy of all relevant training records, or other acceptable information certifying the training and experience completed so far.
- Credit shall be given in full for all adequately documented solo, dual instruction or Pilot in Command (PIC) flight time completed as part of an approved course for the license, rating or certificate.
- The HT of the new ATO shall assess the student and determine the balance of training and experience required to complete the course and any additional training necessary to cover the transition from the previous partly completed course. The HT will then make a recommendation to HCAA Licensing & Training Standards and obtain confirmation of agreement.
- The applicant shall complete the balance of all training, examinations, flight time and shall complete any additional training necessary as specified in the determination by the HT of the new ATO that has been agreed with the HCAA.

#### **NOTE:**

It is the student's responsibility to request the transfer of a copy of their records to the new ATO. The copies must be certified as correct by the originating ATO and should be forwarded directly to the HT of the new ATO, with notification being sent to the HCAA Licensing Section.

#### 17 PERSONAL FLYING LOG

#### 17.1 CONTENT AND CERTIFICATION

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



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

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

### 17.2 INSTRUCTORS LOGBOOKS

The logbooks of instructors who conduct flight instruction on an approved course, including non-EASA instructors, must be maintained in accordance with the current legislation, and include a monthly summary of all flight time which clearly distinguishes approved course instructional flying from other flying.

#### 18 TRAINING PROGRAM (S)

A separate training program / syllabus is required to be submitted and approved for each proposed course and for each variation of a specific course acc.to AMC1 ORA.AT0.125

#### 18.1 CRITERIA AND DETAIL FOR TRAINING MANUAL

See AMC1-ORA.ATO.230 (a)

#### 18.2 CRITERIA AND DETAIL FOR OPERATIONS MANUAL

See AMC1-ORA.ATO.230 (b)

#### 18.3 TRAINING PROGRAM (S) CONTINUED

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

The references don't include revalidation / renewal requirements or guidance.

#### 18.4 SUMMARY TABLE OF REFERENCES

**LAPL** 

LAPL (General)	Aeroplanes	Helicopters	Sailplanes	Balloons
FCL.100				

FCL.105	FCI.105.A	FCL.105.H	FCL.105.S	FCL.105.B
FCL.110	FCL.110.A	FCL.110H	FCL.110.S	FCL.110.B
FCL.115				
FCL.120				
FCL.125				
			FCL.130.S	FCL.130.B
	FCL.135.A	FCL.135.H	FCL.135.S	FCL.135.B
	FCL.140.A	FCL.140.H	FCL.140.S	FCL.140.B

## **PPL**

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

## **CPL**

CPL (General)	Aeroplanes
FCL.300	
FCL.310	
FCL.315	



FCL.320	
	FCL.325.A

## **MPL**

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

## **ATPL**

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

## <u>IR</u>

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

## **CLASS & TYPE RATINGS**

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

## **ADDITIONAL RATINGS**

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

## **INSTRUCTORS**

Instructor Certificate (General)					
		FCL.900			
		FCL.915			
		FCL.920			
		FCL.925			
	FCL.930				
	FCL.935				
	FCL.940				
FI	FI TRI CRI IRI SFI				
FCL.905.FI	L.905.FI FCL.905.TRI FCL.905.CRI FCL.905.IRI FCL.905.SF				
FCL.910.FI	FCL.910.FI FCL910.TRI FCL.910.SFI				



FCL.915.FI	FCL.915.TRI	FCL.915.CRI	FCL.915.IRI	FCL.915.SFI
FCL.930.FI	FCL.930.TRI	FCL.930.TRI	FCL.930.IRI	FCL.930.SFI
	FCL.935.TRI			
FCL.940.FI	FCL.940.TRI	FCL.940.TRI	FCL.940.IRI	FCL.940.SFI

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

#### 19 FLIGHT AND SYNTHETIC FLIGHT TRAINING

#### 19.1 SKILL TEST

An applicant for any skill test shall be recommended for the test by the Organization or person responsible for the training, once the training is complete. FCL1005 (a) (2) states that the person may not conduct the test if they have made the recommendation for the student to take the skill test in accordance with FCL.030. Each applicant for the skill test is required to provide written evidence to the examiner that they have been recommended for the test in accordance with FCL.030 using the approved company procedure at their ATO. This approval must be signed by the person making the recommendation, with the name and the date of the authorizing signatory.

#### 19.2 CREDITS

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

#### 19.3 FLIGHT INSTRUCTION ON IRI (H) COURSE

Although some flight instruction on the IRI (H) course may be conducted on a suitably qualified and approved FSTD, the Skill Test for the IRI(H) will invariably be conducted on a multi-engine helicopter Certified for flight under IFR. Sufficient instruction (an approved IRI course should comprise of at least 10 hours of flight instruction, of which a maximum of 8 hours may be in a FSTD) must be given on the helicopter type to be used for the test to ensure that the candidate has adequate familiarity with it.

#### 20 THEORETICAL KNOWLEDGE INSTRUCTION

#### 20.1 SYLLABUS

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

# 20.2 REFERENCE LIBRARY AND DEMONSTRATION EQUIPMENT

A reference library (which may be either electronic or hard copy) containing publications giving coverage of the syllabus shall be immediately available to Training Personnel and students when in attendance at the ATO and, where applicable, kept current by amendments, see AMC1 ORA.ORA.GEN.215 Facility requirements. Suitable demonstration equipment to support the theoretical knowledge instruction shall be provided.

#### 20.3 STUDENT NOTES AND LEARNING OBJECTIVES

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

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

#### 20.4 COMPUTER BASED TRAINING

Computer Based Training (CBT) may form a part of the Theoretical Knowledge instruction; however, CBT must not exceed 33% of the total Theoretical Knowledge course length without special justification and approval from the HCAA for integrated pilot license courses

Distance learning (study by correspondence) will not be approved as part of an integrated course of training.

#### 20.5 EXAMINATIONS

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

Students sitting Theoretical Knowledge Examination for the issue of an aeroplane class or type rating must satisfy the requirements of Part-FCL Subpart H, Section 2, FCL.725.A and AMC1 FCL.725 (a).

Students sitting Theoretical Knowledge Instruction and Examination for the issue of a Helicopter class or type rating must satisfy the requirements of Subpart H FCL.720.H.

#### 20.6 CLASS AND TYPE RATING EXAMINATIONS

The Theoretical Knowledge syllabus to be followed for a SE and ME Aeroplanes and Helicopters class or type rating can be found at AMC1 FCL.725 (a). The number and type of questions required for different class and type ratings can be found at FCL.725.

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

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

#### 20.7 TRAINING PROGRAM

The integration of Theoretical Knowledge Instruction with the flying and synthetic flight training must be acceptable to the HCAA.

Separate training programs shall be prepared for students entitled to credits in Theoretical Knowledge in accordance with Part-FCL.035.

Satisfactory completion of Theoretical Knowledge Instruction must be recorded.

## 21 PROVISION OF MEP CLASS AND TYPE RATING THEORETICAL KNOWLEDGE EXAMS

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

#### 21.1 THEORETICAL KNOWLEDGE INSTRUCTION –GENERAL

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

#### 21.2 FORMAT OF EXAMINATION PAPERS

Each examination paper should comprise:

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

## 21.3 QUESTION PAPER

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

#### 21.4 ANSWER SHEET

The answer sheet should contain the following:

- Identification of the examination paper to which it relates
- The candidate's name and reference number
- The date of the examination
- A method of recording the candidate's answer to each question
- The mark obtained by the candidate (In each Subject if appropriate)
- The name and signature of the invigilator

#### 21.5 FRAMING OF QUESTIONS



When preparing Theoretical Knowledge Examinations for Part-FCL type ratings, the Examiner should keep in mind that the Examination candidate may not have English as a first language. It is, therefore, important that each question is clearly framed, uses correct English grammar and syntax, and is completely unambiguous.

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

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

The following basic rules should be observed:

- Properly structured and correct English must be used throughout the questions and options. When a statement poses a direct question it should end with a question mark.
- Where the question is framed as a partial statement to be completed by one of the optional answers, the stem should terminate in a semi-colon.
- All four optional answers, when read in conjunction with the question stem, must follow on logically and be grammatically correct.
- The construction of more complex questions should identify the subject, set the scene or conditions or describe the technical situation, prior to the final crucial part of the question.
- When setting questions requiring the use of data tables needing interpolation or graphs with fine scales to calculate the correct answer, ensure that the correct answer is well separated from any of the other answers. Other plausible, but incorrect, answers can be derived, for example, by using an incorrect graph or table which does not match the parameters of the question. Alternatively, following an incorrect sequence, such as diagonals instead of verticals, to obtain dubious results in certain performance graphs would produce a 'credible' answer. Also consider omitting to incorporate some relevant correction factor to derive a false alternative answer.
- Units should always be included in optional answers, where appropriate. They are often a critical element of the correct answer.
- Subject matter that has previously been examined in licensing examinations or that applies to multiple aircraft types should not be included in type rating theoretical knowledge examinations. In particular, questions in Sections 3 and 4 of the examination should, wherever possible, relate to loading and performance calculations using data specific to the relevant aircraft type.

The following must be avoided:

- Answer options that cannot be grammatically and logically linked to the question.
- Questions where more than one answer is completely correct.
- Options such as 'All of the above' or 'None of the above' or example a & c are correct

- Question/Options structure that allows elimination of possible answers on purely logical or numerical grounds, requiring no technical knowledge.
- Abrupt question stems, sometimes of only three words followed by a question mark are unacceptable.
- Mixing the format of optional answers.
- Non-challenging questions, such as 'Q. How many blades on the main rotor?' Answers: a) 1, b) 2, c) 3, d) 4.
- Two of the optional answers being effectively the same.

#### 22 MCC TRAINING

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

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

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

#### 22.1 MCC INSTRUCTORS

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

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

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

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

#### 22.2 MCC THEORETICAL KNOWLEDGE

The MCC Theoretical Knowledge course must comply with the requirements of AMC1 FCL.735.A and AMC1 FCL.735.H and is to be included in the Training Manual. The main emphasis of the theoretical knowledge training should be on the practicalities of working as part of a team and should provide a sound footing on which subsequent CRM training may be



built. Technically orientated material and that covering the specific operation of the aircraft type must be kept to an absolute minimum, particularly on modular courses.

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

#### 22.3 MCC PRACTICAL TRAINING

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

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

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

#### 23 TRAINING AIRCRAFT

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

In determining fleet size the ATO must ensure that a sufficient number of aircraft, suitably equipped and appropriate to the course on offer, are provided to achieve continuity of flying training for the number of students attending the courses. The requirements for routine maintenance and use of aircraft for other purposes must be taken into account when determining fleet size acc. to Part - ORA.GEN.130 (c), AMC1-ORA.ATO.135.

# 23.1 INTERNAL PROCEDURE FOR APPROVAL OF AIRCRAFT

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

#### 23.2 DOCUMENTS AND MANUALS

Aircraft must be maintained in accordance with the appropriate maintenance schedule and the following documentation must be available for Inspection by the HCAA Inspectors:

- Aircraft, engine and component log books as appropriate
- Certificates of Airworthiness and Registration
- Mass and Balance Schedules
- Certificates of Maintenance Review (except where exempt) and Release to Service
- Aircraft Radio Licenses and Radio Installation Approvals
- Flight Manuals or Pilot's Operating Handbooks.
- Certificates of Insurance
- Checklists
- Noise Certificate (if required)

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

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

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

#### 23.3 CRITERIA FOR AIRCRAFT

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

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

Each aircraft must be equipped with a VHF Transceiver with at least 760 channels, controllable from both the student and instructor stations. A two-way intercom must be fitted which permits both pilots to monitor radio communication made by either pilot. All in-flight communications must be carried out using headsets.

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

Hand-held Fire Extinguishers should be carried in accordance with HCAA relevant Guidance instructions and relevant legislation.



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

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

- Have a valid EASA Certificate of Airworthiness and Airworthiness Review Certificate if an EASA aircraft, and meet airworthiness requirements regarding 'life' items; or
- Have a valid Hellenic Certificate of Airworthiness and a Certificate of Maintenance Review in accordance if a non- EASA aircraft.

Aircraft operator (third party liability) insurance must be compliant with EC Regulation [EC] No 785/2004 - Insurance Requirements for Air Carriers and Aircraft Operators. Cover must also include HCAA staff when they are carrying out Inspections or testing on the aircraft.

#### 23.4 TECHNICAL LOGS AND AUTHORIZATION OF FLIGHTS

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

- The date
- The aircraft registration
- The times when the aircraft took-off and landed
- Particulars of any defect known to the commander that might affect the airworthiness or safe operation of the aircraft, or if no such defect is known an entry to that effect
- Fuel and oil states
- Intended duration of flight

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

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

Where an aircraft is hired for use on an approved course of training, or where an aircraft used for approved training ceases to be used by the ATO, a copy of all Technical Logs relating to the approved training shall be retained by the ATO for a period of 5 years.

#### 23.5 CHANGES TO THE FLEET

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

#### 24 FLIGHT SIMULATION TRAINING DEVICES

The paragraph complies with ORA.ATO.135 and ORA.FSTD.

### 24.1 DEVICE QUALIFICATION AND USER APPROVAL

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

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

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

The mechanism and format of the User Approval is changing. This has been brought about by the changes to the regulatory requirement documents themselves. Previously JAR-FSTD H & EU-OPS (but not JAR-OPS 3) specifically stated the requirement for a User Approval. Neither

Part-FCL, Part-ARA, Part-ORA nor Part- ORO contain any reference to a User Approval.

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

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

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

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

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

In summary, a FSTD qualification certificate will be issued by the HCAA (FSTD Standards) where a device satisfies the mandatory regulatory requirements.



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

#### 24.2 TRAINING SYLLABUS

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

#### 25 AERODROMES AND OPERATING SITES

This paragraph complies with AMC1 ORA.ATO.140

#### 25.1 UNLICENSED AERODROMES

Flying training may be conducted by an ATO from unlicensed aerodromes using fixed wing aircraft up to 2730 kg MTOW, and helicopters or gyroplanes up to 3175 kg MTOW, provided that the HT, aerodrome operator and the pilot in command of the aircraft are satisfied on reasonable grounds that the aerodrome is suitable for the purpose. Use of an unlicensed aerodrome as an ATO's base aerodrome or alternative base aerodrome is subject to the approval of the Authority.

It is recommended that adequate risk assessments are made and documented before flying training takes place. A Safety Management System (SMS) provides a framework for the identification and Management of risk, and is required for ATO approval by the implementation date.

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

#### 25.2 AIR TRAFFIC CONTROL DURING FLIGHT TRAINING

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

#### 25.3 USE OF NON-APPROVED AERODROMES

Flight training by an ATO as part of an approved course must take place from either the approved base aerodrome or any approved alternative base aerodrome. However, such flights may land at a non-approved aerodrome during the course of training. Subsequent training exercises may then commence from that non-approved aerodrome provided that the intention is to land back at either the approved base aerodrome or an approved alternative base aerodrome. Pre-flight briefings must, however, have been carried out at either the approved base aerodrome or an approved alternative base aerodrome. Approved training courses may not commence or finish at non-approved aerodromes except special permission is granted and

only for special occasions (weather restrictions, NOTAMS, etc) and only for a limited duration.

#### 25.4 USE OF OVERSEAS AERODROMES

Use of an overseas aerodrome as an ATO's base aerodrome or alternative base aerodrome will not be approved by the Authority unless it can be demonstrated that the aerodrome can at meet the national requirements. Use of unlicensed overseas aerodromes for flying training on approved courses is subject to the restrictions. The use of unlicensed aerodromes will be considered by the HCAA upon receipt of an application.

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

# 26 FACILITIES FOR FLIGHT OPERATIONS AND THEORETICAL KNOWLEDGE INSTRUCTION

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

#### 27 OPERATIONAL PUBLICATIONS

# 27.1 REQUIRED PUBLICATIONS

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

- EASA Part-FCL
- EASA Part-ORA
- OEB/OSD reports
- Hellenic Aeronautical Information Publication including Danger Area and Area of Intensive Aerial Activity (AIAA) Charts and Notam Class II supplements. (CD- Rom versions of the AIP will be acceptable or icon linked versions held on a computer provided that it can be shown that students have unrestricted and immediate access to them).
- Aeronautical Information Circulars



- Flight Manuals for the aircraft used on the course(s) and Standard meteorology reports and forecasts (in document or computer based formats)
- Flight planning documents
- NOTAMs
- Where applicable SID/STAR charts and aerodrome Instrument Approach Charts. These may be proprietary flight guides acceptable to the HCAA, e.g. AERAD, Jeppesen
- HCAA Information Notices

#### 27.2 OTHER PUBLICATIONS

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

**ATO Operations Manual** 

ATO Training Manual(s)

ATO Safety Management System & Compliance Monitoring Manuals

#### 27.3 GUIDANCE MATERIAL

To assist ATOs in the production of OM, TM and OMM a "User Guide for ATO Manuals" and other information bulletins when produced will be uploaded at the HCAA web site: <a href="http://www.hcaa.gr/content/index.asp?tid=21">http://www.hcaa.gr/content/index.asp?tid=21</a>

#### 27.4 ELECTRONIC DOCUMENTATION

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

#### 28 TRAINING MANUAL AND OPERATIONS MANUAL

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

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

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

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

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

Document control shall be identified as one of the Management system key processes addressed by ORA.GEN.200 (a) (5).

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

#### 28.1 TRAINING MANUAL

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

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

- Part 1 The Training Plan
- Part 2 Briefing and Air Exercises
- Part 3 Flight training in an FSTD, if applicable
- Part 4 Theoretical Knowledge Instruction

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

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

A TM should not include flight exercise briefing material. Its primary purpose is to advise the student WHAT they will be doing and WHEN; rather than HOW. There should be a clearly defined aim for each exercise directed at the student not the instructor; "to teach" is an instructor aim, whereas "to learn" or "to be able to" are student aims. The purpose of the Skill



Test is to determine if the aim has been achieved; the test should not form part of the aim. Exercise content should list the specific skill items that will be taught/practiced during an exercise. Each exercise brief should have a concise statement of what standard the student is expected to achieve on completion of the exercise. This should be a measurable quantity against which the student may be judged.

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

#### 28.2 OPERATIONS MANUAL

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

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

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

#### 29 SAFETY MANAGEMENT SYSTEM

ORA.GEN.200 requires that all Management system key processes be documented. Guidance has been developed to help Organizations in their understanding of the SMS concept and of the development of Management policies and processes to implement and maintain an SMS that will comply with the EASA Aircrew Regulation. It is the responsibility of the Organization to identify the document to be used. The information may be contained in any of the Organizations manuals (e.g. Organizations Management Manual, Operations Manual or Training Manual), which may also be combined. If the Organizations Management Manual (OMM) is partly or totally incorporated in other documents of the Organization, it is the responsibility of that Organization to provide a cross reference table clearly identifying all the various elements of the Management system.

#### **Safety Management System**

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

The HCAA website provides SMS guidance on the requirements for small non-complex organizations (generally less than 20 employees but there are other discriminators) and separate guidance for large complex organizations. The SMS guidance entitled "SMS Evaluation Framework/Gap Analysis" can be found at the following link: http://www.hcaa.gr/content/index.asp?tid=21&lang=2.

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

There are two options for ATOs:

- Demonstrate a fully established SMS; or
- An effective SMS implementation by 8 April 2014.

Completion and submission of the relevant self-assessment checklist, found in the aforementioned guidance material, will suffice for the second option. Where questions are answered with a "no" or "partial" then proposed actions to achieve compliance should be specified and the time scale stated for implementation. "Partial" or "yes" answers should bear the reference to where the requirement is captured or partially captured in the SMS documentation. Progress towards compliance will be monitored by the HCAA.

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

See in this Manual Chapter "Safety Management".

#### 29.1 SMS EVALUATION

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

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

#### 29.2 SMS OVERSIGHT

SMS Oversight uses two different evaluation forms that are available on the HCAA website.

Phase 1 SMS assessment determines whether the key elements of an SMS are in place (present and suitable).

Phase 2 assesses whether the SMS is operating and effective and looks for best practice and signs of excellence. Both are intended to be completed by the organization but in some cases this may be done during an assessment by HCAA Oversight personnel. The assessment consists of:

• Phase 1 Evaluation framework as an initial assessment



- For a new applicant;
- For an existing approved organization implementing SMS as part of EASA transition arrangements.
- Phase 2 Evaluation tool to assess SMS effectiveness
- For a new applicant within 1 year of the approval being issued;
- For an existing approved organization implementing SMS as part of EASA transitional arrangement and has achieved at least 80% of Phase 1;
- For continued Oversight of an organization's SMS.

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

#### 29.3 COMPLIANCE & MONITORING

AMC1 ORA.GEN.200 (a) (6) describes the requirements and procedures an organization must adopt to monitor Compliance with the relevant stipulations of Part- ORA and other applicable Parts.

The Accountable Manager should designate a Compliance Monitoring Manager to ensure that the activities of the Organization are Monitored for Compliance with the applicable Regulatory Requirements, and any additional requirements established by the Organization, and that these activities are being carried out properly under supervision of the relevant head of functional area. The Organizational set-up of the Compliance Monitoring function should reflect the size of the Organization and the nature and complexity of its activity.

## 30 REQUIREMENTS FOR ENTRY TO TRAINING

#### 30.1 MEDICAL

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

#### 30.2 INTEGRATED COURSES

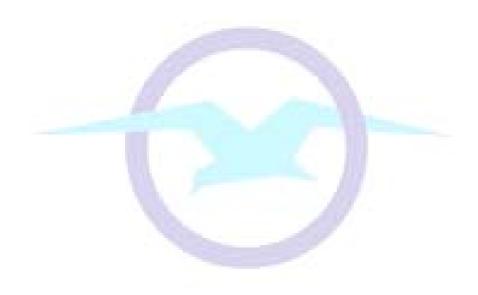
On integrated courses it is recommended that Theoretical Knowledge should be integrated throughout the flying training syllabus.

ATO's are to ensure students have attained a suitable educational standard in mathematics, physics and English so that realistically, they may successfully follow and complete the course. It is therefore in the student's interest that he/she has an educational background

sufficient to enable him/her to keep pace with the theoretical knowledge training program without undue difficulty.

#### 30.3 MODULAR COURSE

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



#### **APPENDIX A**

#### SUBMISSION OF ATO MANUALS

The initial issue of a proposed new Manual, regardless of whether it is in relation to an application for ATO Approval or by an ATO holding Approval, should be in a paper copy format.

Once approved an electronic copy should be submitted in a single PDF file for inclusion in the electronic document library.

Subsequent amended submissions should be forwarded by submission of the complete Manual in a single file with the changes identified. The procedures for submission of an amended Manual are as follows:

For the assessment of:



- Manuals that were returned to the ATO by the D2/B with instructions for amendment and therefore require further review prior to initial Acceptance.
- Manuals that now include information previously stated on the ATO Approval Certificate.
- Manuals which incorporate a change (or changes) where the publications were previously accepted by D2/B.

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

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

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

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

## **MANUAL AMENDMENT NOTIFICATION**

Organisation Name:
Manual Title:
Amendment/Version/Issue Number:
Date of Issuance:

**Check as Required** 

Manual(s) returned by the Authority and requires prior initial Acceptance	
Manual now includes information previously stated on the ATO Approval Certificate	
Manual incorporates a change (or changes) where the previous publication was accepted by the D2/B	
Manual now includes an accepted change	

General	Ov	erview	$\mathbf{of}$	<b>1</b> men	dm	ents
Ctener ai	ししりり	ei view	VI F	7IIIGII	um	ents.

# HCAA Use

<b>Manual Revision received</b>	and accepted/ not accepted (delete as
appropriate).	



# INTENTIONALLY LEFT BLANK

