Annex to ED Decision 2015/011/R

Proposed amendments

The text of the amendment is arranged to show deleted text, new or amended text as shown below:

(a)   deleted text is marked with ~~strike through~~;

(b)   new or amended text is highlighted in grey;

(c)   an ellipsis (…) indicates that the remaining text is unchanged in front of or following the reflected amendment.

The Annex to ED Decision 2012/007/R (AMC/GM to Part-ORA) is amended as follows:

1.   The following new AMC1 ORA.GEN.200(c) is inserted:

AMC1 ORA.GEN.200(c)   Management system
ATOs PROVIDING TRAINING ONLY FOR THE LAPL, PPL, SPL AND BPL AND THE ASSOCIATED RATINGS OR CERTIFICATES — ORGANISATIONAL REVIEW

(a)   The primary objective of the organisational review is to enable the organisation to ensure that its management system remains effective by verifying that it:

  (1)   has continually identified its aviation safety hazards;

  (2)   has effectively mitigated the associated risks; and

  (3)   monitors compliance with the applicable requirements.

(b)   Safety risk management should:

  (1)   be performed using internal safety or occurrence reports, hazard checklists, risk registers or similar risk management tools or processes, integrated into the activities of the organisation;

  (2)   in particular address safety risks related to a change; making use of the existing hazard identification, risk assessment and mitigation tools or processes; and

  (3)   include provisions for emergency response or a formal Emergency Response Plan (ERP).

(c)   As part of the management system documentation required by ORA.GEN.200(a)(5), the organisation should describe the organisational review programme and related responsibilities. Persons responsible for the organisational review should have a thorough knowledge of the applicable requirements and of the organisation's procedures.

(d)   The status of all corrective and risk mitigation actions should be monitored by the person responsible for the organisational review programme and implemented within a specified time frame. Action closure should be recorded by the person responsible for the organisational review programme, along with a summary of the action taken.

(e)   The results of the organisational review, including all non-compliance findings and new risks identified during the review, should be presented to the accountable manager and

the person or group of persons nominated in accordance with ORA.GEN.210(b) prior to notification to the competent authority. All level 1 findings in the sense of ARA.GEN.350 should be immediately notified to the competent authority and all necessary actions immediately taken.

(f)   Based on the results of the organisational review, the accountable manager should determine the need for and initiate, as appropriate, further actions to address deficiencies in or further improve the organisation's management system.

2.   The following new GM1 ORA.GEN.200(c) is inserted:

GM1 ORA.GEN.200(c)   Management system
ATOs PROVIDING TRAINING ONLY FOR THE LAPL, PPL, SPL OR BPL AND THE ASSOCIATED RATINGS OR CERTIFICATES — ORGANISATIONAL REVIEW PROGRAMME

(a)   The organisational review programme may consist of:

(1)   checklist(s) covering all items necessary to be addressed in order to ensure that the organisation identified its aviation safety hazards, effectively mitigates the associated risks and ensures effective compliance with the applicable requirements. These should address all procedures described in the management system documentation and training manual; and

(2)   a schedule for the accomplishment of the different checklist items, with each item being checked at least once within any 12-month period. The organisation may choose to conduct one full review annually or to conduct several partial reviews.

(b)   Performance of organisational reviews:

Each review item may be addressed using an appropriate combination of:

(1)   review of training records, training documentation;

(2)   review of internal safety reports (e.g. notified difficulties in using current procedures and training material, etc.);

(3)   review of the risk register and hazard checklists, as applicable;

(4)   sample check of training courses;

(5)   witnessing of examinations, as appropriate;

(6)   interview of the personnel involved; and

(7)   review of the feedback provided by students and customers.

(c)   It is recommended that internal safety reports and occurrence reports be reviewed on a continual basis with the aim of identifying possible corrective and risk mitigation actions.

3.   The following new GM2 ORA.GEN.200(c) is inserted:

GM2 ORA.GEN.200(c)   Management system
ATOs PROVIDING TRAINING ONLY FOR THE LAPL, PPL, SPL OR BPL AND THE ASSOCIATED RATINGS OR CERTIFICATES — ORGANISATIONAL REVIEW ITEMS

The following provides a list of typical items for an organisational review checklist, to be adapted as necessary to cover all relevant procedures described in the management system documentation and training manual:

(a)   Terms of approval

Check that:

(1)   no training has been performed outside the terms of approval;

(2)   changes not requiring prior approval have been properly managed.

(b)   Training syllabi and course material

Check that:

(1)   training syllabi and course materials are in compliance with the applicable requirements, as last amended;

(2)   training practices are in compliance with the documentation; and

(3)   instructor training practices are standardised.

(c)   Training equipment and tools

Check that all equipment and tools other than aircraft and FSTDs are present and meet the criteria defined in the training manual.

(d)   Facilities

Check that the facilities meet the criteria defined in the training manual.

(e)   Training aircraft and FSTDs

Check that the training aircraft and FSTDs meet the criteria defined in the training manual.

(f)   Personnel

Check that:

(1)   the current accountable manager and other nominated persons are correctly identified;

(2)   the organisation chart accurately indicates lines of responsibility and accountability throughout the organisation;

(3)   the organisation remains in compliance with the applicable requirements, in case the number of personnel has decreased or if the activity has increased;

(4)   the qualification of all new personnel (or personnel with new functions) has been appropriately assessed;

(5)   staff involved in any safety management-related processes and tasks has been properly trained; and

(6)   staff has been trained, as necessary, to cover changes in regulations, in competent authority publications, in the organisation, its management system documentation and in associated procedures, etc.

(g)   Contracted activities (In case the organisation has contracted activities):

(1)   Check that new providers have been assessed prior to the establishment of any contract;

(2)   For existing providers approved for such activities: check the authorisation and approval status of the contracted organisation; and

(3)   For existing providers not approved for such activities: check that the service provided conforms to the applicable requirements of this Part.

(h)   Training and communication on safety

Check that:

(1)   all personnel are aware of safety management policies, processes and tasks;

(2)   safety-related documentations and publications are available; and

(3)   safety-critical information derived from internal safety or occurrence reporting and hazard identification have been timely communicated to all staff concerned.

(i)   Management system documentation

Check that:

(1)   the documentation is adequate and updated;

(2)   staff are aware of the safety policy; and

(3)   staff can easily access such documentation when needed.

(j)   Record-keeping

Check that:

(1)   the records cover all the training activities and management system processes; and

(2)   minimum record-keeping periods (random checks) are complied with.

(k)   Emergency response provisions or ERP

Check that:

(1)   emergency response information is up to date and readily available; and

(2)   all staff are aware of emergency response information or the ERP, as applicable (random checks).

(l)   Internal safety or occurrence reporting procedures

    (1)   Check the number of reports received since the last review;

    (2)   Check that:

        (i)   internal reporting and external occurrence reporting are performed in accordance with reporting procedures;

        (ii)   the safety or occurrence reports are analysed; and

        (iii)   feedback is provided to reporters.

(m)   Other risk management tools or processes implemented

    (1)   As applicable, check that:

        (i)   records of hazards and risks are assessed; in particular following analysis of safety or occurrence reports and when significant changes occur (regulations, personnel, training aircraft, training courses, etc.);

        (ii)   the risks are assessed and the risk mitigation actions followed-up and recorded;

        (iii)   any risk that has been found acceptable is duly justified; and

        (iv)   the assumptions made for the risk assessment remain valid;

    (2)   Verify the effectiveness of all risk mitigation actions initiated since the last organisational review.