



**Circulaire**

**CIR/FCL 3**

Date : 11/2008  
Datum : 11/2008

Edition : 4  
Uitgave : 4

**Objet : Approbation d'un TRTO.**

**Betreft : Goedkeuring van een TRTO.**

Réf. :

Arrêté royal du 4 mars 2008 réglementant les licences civiles de pilote d'avions. Art. 19.

Ref. :

Koninklijk besluit van 4 maart 2008 tot regeling van de burgerlijke vergunningen van bestuurder van vliegtuigen. Art. 19.

JAR-FCL 1.055(b)  
App 2 to JAR-FCL 1.055  
AMC-FCL 1.055  
IEM 1 to JAR-FCL 1.055

JAR-FCL 1.055(b)  
App 2 to JAR-FCL 1.055  
AMC-FCL 1.055  
IEM 1 to JAR-FCL 1.055

Le Directeur général a.i.,  
De Directeur-generaal a.i.,

L'édition 4 comprend  
De 4<sup>de</sup> uitgave bevat

Frank DURINCKX

20 pages datées : 11/2008  
blz. gedagtekend

## DEMANDE D'APPROBATION D'UN TRTO

### COMPOSITION DU DOSSIER

Les organismes désirant obtenir une approbation comme TRTO doivent introduire auprès de la Direction générale Transport aérien un dossier comportant tous les éléments nécessaires pour une approbation et qui démontre qu'ils répondent à toutes les conditions requises pour obtenir une approbation comme TRTO conformément aux dispositions de l'Appendice 2 au JAR-FCL 1.055 ci-après.

Le dossier comporte :

- a) un **fascicule administratif** comportant :
1. le formulaire de demande TRTO (annexe A) complété ainsi que les documents y mentionnés;
  2. le formulaire (annexe B) concernant les formations envisagées;
  3. les statuts du TRTO;
  4. une copie de l'inscription au registre de commerce;
  5. une liste complète du personnel du TRTO avec mention de la fonction;
  6. un organigramme du TRTO et éventuellement de l'organisation dont le TRTO fait partie;
  7. pour les instructeurs de cours théoriques: pour chaque cours mentionner le diplôme, l'expérience et les qualifications ainsi que les références pédagogiques;
  8. documents concernant les assurances;
  9. plan des locaux et description des utilisations;
  10. documentation concernant le système qualité du TRTO: politique générale, description des procédures/audits, un exemplaire du quality manual.
  11. documents financiers:
    - lors d'une première demande d'approbation du TRTO: une attestation délivrée par un bureau comptable/audit reconnu confirmant que l'organisme dispose d'un financement suffisant pour exercer les activités envisagées;
    - lors d'une demande de renouvellement de l'approbation: une attestation délivrée par un comptable reconnu après un

## AANVRAAG TOT ERKENNING VAN EEN TRTO

### SAMENSTELLING VAN HET DOSSIER

Instellingen die een erkenning als TRTO wensen aan te vragen, dienen bij het Directoraat-generaal Luchtvaart een dossier in te dienen dat alle gegevens bevat die voor een erkenning nodig zijn en waaruit blijkt dat zij voldoen aan alle voorwaarden die voor een erkenning als TRTO zijn vereist, overeenkomstig de bepalingen van Appendix2 JAR-FCL 1.055 hierna.

Het dossier is samengesteld uit:

- a) een **administratieve bundel** dat bevat :
1. het volledig ingevulde **aanvraagformulier TRTO (bijlage A)** en de daarop vermelde documenten;
  2. het **formulier (bijlage B)** betreffende de aard van de opleiding die zal worden verstrekt;
  3. de statuten van de TRTO;
  4. een kopie van de inschrijving in het handelsregister;
  5. een volledige lijst van het personeel van de TRTO met vermelding van de functie
  6. een organogram van de TRTO en eventueel van de organisatie waarvan de TRTO deel uitmaakt;
  7. voor de instructeurs theorieopleiding: voor iedere gegeven cursus: opgave van diploma, ervaring en kwalificaties evenals van de pedagogische referenties;
  8. documenten betreffende de verzekering;
  9. plan van de lokalen met aanduiding van hun gebruik;
  10. documentatie betreffende het kwaliteitssysteem van de TRTO: algemene richtlijnen, beschrijving van procedures/audits, een exemplaar van de quality manual.
  11. financiële documenten:
    - bij de eerste aanvraag tot erkenning van de TRTO: een attest uitgereikt door een erkend accountant/auditbureau waarin bevestigd wordt dat de instelling voldoende financiële draagkracht heeft om de geplande activiteiten uit te oefenen;
    - bij de aanvraag tot hernieuwing van de erkenning: een attest uitgereikt door een erkende accountant na een onderzoek

examen des bilans et des comptes de la période échue, certifiant que l'organisme dispose d'un financement suffisant pour continuer les activités.

van de balansen en de rekeningen van de voorbije periode, waarin bevestigd wordt dat de instelling voldoende financiële draagkracht heeft om de activiteiten verder te zetten.

b) un "**training manual**" comprenant :

- toutes les données requises au § 26 de l'App 2 au JAR-FCL 1.055;
- (voir également circulaire FCL 2 : FTO)
- la procédure de modification du manuel ;
- les programmes des formations mentionnées au formulaire de l'annexe B. Ces programmes constituent une entité autonome du manuel;
- Pour chacun de ces programmes seront joints:
  - a) les conditions d'admissions à la formation (voir e.a. JAR-FCL 1.250 pour qualification de type) ;
  - b) une description des procédures d'évaluation théorique et pratique ;
  - c) une description des exercices ;
  - d) une description des procédures des examens et repêchages.
- le dossier des élèves : dossier type, procédures de conservation des résultats des examens et des tests et d'archivage des dossiers.

c) un "**operations manual**" comprenant :

- toutes les données requises au § 27 de l'App 2 au JAR-FCL 1.055; (voir également circulaire FCL 2 : FTO)
- la procédure de modification du manuel;
- l'indication des renseignements de l'"operations manual" et des groupes particuliers de personnel auxquels ils seront communiqués (instructeurs de théorie et de vol, personnel opérations et de maintenance).

d) Toute modification d'une des données fournies lors de la première demande (modification du personnel, aéronefs, formations, etc.) sera communiquée immédiatement à la Direction générale Transport aérien par lettre recommandée ou par courriel.

b) een '**training manual**' waarin:

- alle gegevens zoals voorzien in § 26 van App 2 JAR-FCL 1.055; (zie ook circulaire FCL 2: FTO)
- de procedure volgens dewelke de manual wordt geamendeerd;
- de **programma's van de opleidingen** vermeld in het formulier in bijlage B. Deze worden als een zelfstandig onderdeel in de training manual opgenomen;
- Voor elk van deze programma's wordt bijgevoegd:
  - a) de toelatingsvoorwaarden tot de opleiding (zie o.m. JAR-FCL 1.250 voor typebevoegdverklaring);
  - b) een beschrijving van de theoretische en praktische evaluatieprocedures;
  - c) een beschrijving, van de vlieg oefeningen;
  - d) een beschrijving van de procedures van de examens/herkansingen.
- het **dossier van de leerlingen**: typedossier, procedures van bijhouden van de examens en testresultaten en van bewaring van de dossiers.

c) een '**operations manual**' met inbegrip van :

- alle gegevens zoals voorzien in § 27 van App 2 JAR-FCL 1.055; (zie ook circulaire FCL 2: FTO)
- de wijzigingsprocedure voor de manual;
- de aanduiding van welke onderdelen van de 'operations manual' aan welke personeelsgroepen worden medegedeeld (theorie- en vlieg instructeurs, personeel operaties en onderhoud).

d) Elke wijziging aan één van de gegevens zoals die bij de oorspronkelijke aanvraag werden verstrekt (wijziging van het personeel, luchtvaartuigen, opleidingen, enz.), moet onmiddellijk per aangetekend schrijven of per e-mail door de aanvrager aan het Directoraat-generaal Luchtvaart worden meegedeeld.

	RENSEIGNEMENTS	INFO SUPPLEMENTAIRE ET DOCUMENTS
1.	Nom de l'organisme / adresse / téléphone / fax / e-mail	Si le TRTO dispose de différents lieux d'activité, mentionner toutes les adresses.
2.	Formations envisagées par le TRTO	Type ratings / MCC Formation synthétique Autre
3.	Nom du responsable pédagogique ( HT )	Type et numéro de la licence Full/part time Curriculum vitae
4.	Type rating instructors ( TRI )	Type et numéro de la licence Full/part time Curriculum vitae
5.	Synthetic flight instructors ( SFI )	Type et numéro de la licence (évt) Full/part time Curriculum vitae
6.	Flight instructors ( FI )	Type et numéro de la licence Full/part time Curriculum vitae
7.	Instructeurs sol	Qualifications Curriculum vitae Full/part time
8.	Installations pour l'instruction théorique	Emplacement / nombre / taille nombre d'élèves prévu par local.
9.	Flight simulator ( FS )	Emplacement / exploitant Nombre / type / constructeur Numéro et date d'approbation
10.	FTD – FNPT I / II-OTD	Emplacement / exploitant Nombre / type / constructeur Numéro et date d'approbation
11.	Aéronefs	Type Exploitant Aéroport
12.	Documents et manuels à joindre à la demande	a) programmes de formation b) dossiers de formation c) opérations manual d) training manual
13.	Renseignements concernant le système qualité	Nom du quality manager

Le soussigné ..... ( nom du responsable pédagogique),  
agissant au nom de ..... (nom du TRTO) atteste que toutes les informations figurant  
ci-dessus et figurant dans les dossiers et manuels joints sont complètes et correctes. Toute  
modification de ces données sera communiquée immédiatement à la Direction générale Transport  
aérien par lettre recommandée ou par courriel.

DATE

SIGNATURE

	<b>GEGEVENS</b>	<b>BIJKOMENDE INFO EN DOCUMENTEN</b>
1.	Naam van de instelling / adres / telefoon / fax / e-mail	Indien de TRTO gebruik maakt van meerdere locaties alle adressen vermelden.
2.	Opleidingen die de TRTO wenst te geven	Type ratings / MCC Synthetische opleiding andere
3.	Naam van het Hoofd van de opleiding ( HT )	Type en nummer vergunning Full/part time Curriculum vitae
4.	Type rating instructors ( TRI )	Type en nummer vergunning Full/part time Curriculum vitae
5.	Synthetic flight instructors ( SFI )	Type en nummer vergunning (evt) Full/part time Curriculum vitae
6.	Flight instructors ( FI )	Type en nummer vergunning Full/part time Curriculum vitae
7.	Theorie-instructeurs	Kwalificaties Curriculum vitae Full/part time
8.	Lokalen gebruikt voor de theoretische opleiding	Plaats /aantal/ afmetingen aantal leerlingen per lokaal
9.	Flight simulator ( FS )	Lokatie / exploitant Aantal / type / constructeur Erkenningsnummer en –datum
10.	FTD – FNPT I / II - OTD	Lokatie / exploitant Aantal / type / constructeur Erkenningsnummer en –datum
11.	Luchtvaartuigen	Type Exploitant Luchthaven
12.	Documenten en manuals te voegen bij de aanvraag	a) opleidingsprogramma's b) opleidingsdossiers c) operations manual d) training manual
13.	Gegevens betreffende het kwaliteitssysteem	Naam van de quality manager

Ondergetekende ..... (naam van het hoofd van de opleiding), handelend namens ..... (naam TRTO) verklaart dat alle gegevens zoals hierboven vermeld en zoals voorkomend in de bijgevoegde dossiers en manuals, volledig en juist zijn. Iedere wijziging van deze gegevens zal onmiddellijk per aangetekend schrijven of per e-mail aan het Directoraat-generaal Luchtvaart worden medegedeeld.

DATUM

HANDTEKENING

**ANNEXE B FORMULAIRE DE DEMANDE D'APPROBATION DE PROGRAMME DE FORMATION**

**A. RENSEIGNEMENTS CONCERNANT L'ORGANISME DEMANDEUR**

Nom de l'organisme	
Nature de l'organisme (1) rayer les mentions inutiles	TRTO / TRTO / EXPLOITANT / CONSTRUCTEUR OSFT / INSTRUCTEUR (1)
Adresse Téléphone/ Fax / e-mail	
Si le demandeur est instructeur mentionner licence et qualifications	
Numéro de l'approbation de l'organisme	Approuvé sous le numéro .....

**B. RENSEIGNEMENTS CONCERNANT LES FORMATIONS**

Nature des formations	
Conditions d'admission à la formation	
Contenu des formations	FORMATION AU SOL: .....heures. TEST/CONTROLE: ...heures Lieu: ..... Organisme ou instructeur responsable: .....  FORMATION SYNTHETIQUE: .....heures. TEST/CONTROLE: ...heures Lieu: ..... Organisme ou instructeur responsable: .....  FORMATION EN VOL: .....heures TEST/CONTROLE: ...heures Aéroport: ..... Organisme ou instructeur responsable: .....
STD/ FS	Type : ..... Constructeur: ..... Exploitant: ..... Numéro d'approbation: ..... Date de la dernière approbation: .....
Locaux (s'ils ne sont pas mentionnés dans l'annexe A)	
Aéronefs	Type ..... Nombre: ..... Immatriculation ..... Exploitant: .....

Le soussigné ..... ( responsable pédagogique ) atteste que les formations mentionnées ci-dessus seront effectuées sous ma responsabilité conformément aux dispositions contenues dans le programme de formation ci-joint. Toute modification de ces données sera communiquée immédiatement à la Direction générale Transport aérien par lettre recommandée ou par courriel.

DATE

SIGNATURE

**C. CERTIFICAT D'APPROBATION**

Le programme de formation à ..... spécifié ci-dessus a été approuvé pour être effectué sous la responsabilité de.....		
Observations: .....		
Date et numéro de l'approbation: .....		
Date et numéro de la prorogation:.....		
DATE	SIGNATURE	SCEAU DE L'AUTORITE

**BIJLAGE B AANVRAAGFORMULIER VOOR GOEDKEURING VAN EEN  
OPLEIDINGSPROGRAMMA**

**A. GEGEVENS BETREFFENDE DE AANVRAGENDE INSTELLING**

Naam van de instelling	
Aard van de instelling (1) schrappen wat niet past	TRTO / TRTO / EXPLOITANT / CONSTRUCTEUR IGTO / INSTRUCTEUR (1)
Adres Telefoon / Fax / e-mail	
Indien de aanvrager een instructeur is: vergunning en bevoegdverklaringen	
Nummer van erkenning van de instelling	Erkend onder nummer .....

**B. GEGEVENS BETREFFENDE DE OPLEIDINGEN**

Aard van de opleiding(en)	
Voorwaarden voor toelating tot de opleiding	
Inhoud van de opleiding	GRONDINSTRUCTIE: .....uren. TEST/CONTROLE: .....uren Plaats: ..... Instelling of verantwoordelijk instructeur: .....  SYNTHETISCHE OPLEIDING: .....uren. TEST/CONTROLE: .....uren Plaats: ..... Instelling of verantwoordelijk instructeur: .....  VLIEGOPLEIDING: .....uren TEST/CONTROLE: .....uren Luchthaven: ..... Instelling of verantwoordelijk instructeur: .....
STD/ FS	Type : ..... Constructeur: ..... Exploitant: ..... Erkend onder nummer: ..... Datum van de laatste goedkeuring: .....
Lokalen (indien verschillend van de lokalen in bijlage A)	Plaats / aantal / afmetingen / beschrijving van de infrastructuur Voorzien aantal leerlingen per lokaal
Luchtvaartuigen	Type: ..... Aantal: ..... Inschrijvingskenmerken: ..... Exploitant: .....

Ondergetekende.....(hoofd van de opleiding) verklaar dat de hierboven vermelde opleiding onder mijn verantwoordelijkheid zal worden verstrekt overeenkomstig de bepalingen vervat in het programma van de opleiding zoals bijgevoegd. Iedere wijziging van deze gegevens zal onmiddellijk per aangetekend schrijven of per e-mail aan het Directoraat-generaal Luchtvaart worden meegedeeld.

DATUM

HANDTEKENING

**C. ATTEST VAN GOEDKEURING**

Het programma van de opleiding voor .....zoals hierboven vermeld werd goedgekeurd om te worden verstrekt onder de verantwoordelijkheid van .....		
Opmerkingen: .....		
Datum en nummer van de goedkeuring: .....		
Datum en nummer van de hernieuwing: .....		
DATUM	HANDTEKENING	ZEGEL VAN DE OVERHEID

## **Appendix 2 to JAR–FCL 1.055**

### **Type Rating Training Organisations for the issue of type ratings only to pilot licence holders**

(See JAR–FCL 1.055)

(See also JAR–FCL 1.261(c) & (d) for approval of courses)

(See IEM No. 1 to JAR–FCL 1.055)

(See IEM No. 2 to JAR–FCL 1.055)

(See IEM No. 3 to JAR–FCL 1.055)

(See AMC FCL 1.261(c)(2))

#### **INTRODUCTION**

1 A Type Rating Training Organisation (TRTO) is an organisation staffed, equipped and operated in a suitable environment offering type rating training, and/or MCC-training, and/or synthetic flight instruction and, if applicable, theoretical instruction for specific training programmes.

2 A TRTO wishing to offer approved training to meet JAR–FCL requirements shall obtain the approval of the Authority of a JAA Member State. No such approval will be granted by the Authority of the Member State unless:

(a) the Authority can enforce the JAR–FCL requirements;

(b) the TRTO meets all requirements of JAR–FCL.

This Appendix gives the requirements for the issue, revalidation and variation of the approval of a TRTO.

#### **OBTAINING APPROVAL**

3 A TRTO seeking approval shall provide to the Authority operations and training manuals, including quality systems, and descriptions of its training schemes as required by paragraph 17 and 25 through 27. After consideration of the application, the TRTO will be inspected to ensure that it meets the requirements set out in this Appendix. Subject to satisfactory inspection, approval of the TRTO will initially be granted for a period of one year, revalidation of the approval may be granted for further periods of up to three years (see AMC FCL 1.055 and IEM FCL No. 1 to JAR–FCL 1.055). No Authority is obliged to grant an approval for a TRTO outside the JAA Member States if the personnel resources are not available or the cost of processing the application for approval and inspections puts undue burden on the Authority.

4 All training courses shall be approved (see IEM FCL 1.055 to be developed).

5 Approval will be varied, suspended or revoked by the Authority if any of the approval requirements or standards cease to be maintained to the minimum approved level.

6 If a TRTO wishes to make changes to an approved course or to its operations or training manual the approval of the Authority shall be obtained before the changes are implemented. TRTOs need not advise the Authority of minor changes in day-to-day operations. Where any doubt exists as to whether a proposed change is minor, the Authority shall be consulted.

A TRTO may make training arrangements with other training organisations or make use of alternative base aerodromes as part of its overall training organisation, subject to the approval of the Authority.

#### **FINANCIAL RESOURCES**

8 (a) A TRTO shall satisfy the Authority that sufficient funding is available to conduct training to the approved standards (see IEM No. 2 to JAR–FCL 1.055).

(b) A TRTO shall nominate a person acceptable to the Authority who shall satisfy the Authority that sufficient funding is available to conduct training to the approved standard. Such person shall be known as the accountable manager.

#### **INSPECTION**

9 In addition to the initial inspection, the Authority will make certain inspections to determine the TRTO's compliance with JARs and the approval.

10 During such visits, access shall be given by the TRTO to training records, authorisation sheets, technical logs, lectures, study notes and briefings and any other relevant material. A copy of any report on a visit to a TRTO will be made available to that TRTO.

#### MANAGEMENT AND STAFFING

11 The management structure shall ensure supervision of all grades of staff by persons having the experience and qualities necessary to ensure the maintenance of high standards. Details of the management structure, indicating individual responsibilities, shall be included in the TRTO's Operations Manual.

12 A Head of Training (HT) acceptable to the Authority shall be nominated. The HT's responsibilities shall include ensuring that the TRTO is in compliance with JAR-FCL requirements. This person is ultimately directly responsible to the Authority.

13 The TRTO shall have adequate personnel necessary to accomplish the training objectives. The duties of each instructor shall be identified and documented.

#### TYPE RATING INSTRUCTOR

14 Type Rating Instructors (TRI) shall hold:

- (a) a professional pilot licence and rating(s) related to the flying training courses they are appointed to conduct;
- (b) a type rating instructor rating for the aeroplanes used on the course(s); or
- (c) an authorisation from the Authority to conduct specific training in a TRTO (see JAR-FCL 1.300).

#### INSTRUCTORS FOR SYNTHETIC FLIGHT TRAINING

15 For flight training duties on a FTD, instructors shall have instructional experience appropriate to the training courses they are appointed to conduct and hold or have held 3 years prior to the first appointment, a professional pilot licence, except for instructors having an authorisation according to item 3 and/or 4 of Appendix 1 to JAR-FCL 1.005. For multi-pilot type rating and/or MCC flight training on a flight simulator and/or FTD and/or FNPT II, instructors shall hold a TRI rating or a SFI authorisation.

#### THEORETICAL KNOWLEDGE INSTRUCTION

16 The theoretical knowledge instruction shall be conducted by an authorised instructor holding the appropriate type/class rating or any instructor having appropriate experience in aviation and knowledge of the aircraft concerned, e.g. flight engineer, maintenance engineer, flight operations officer.

#### TRAINING STANDARDS

17 The TRTO shall establish a system to ensure that the training centre operations and training are run efficiently and effectively. The quality system shall determine the effectiveness of TRTO policies, procedures, and training.

## RECORDS

18 A TRTO shall maintain the following records and retain for a period of at least 5 years, using appropriate administrative staff:

- (a) pilot trainee's assessments before and during the course;
- (b) details of theoretical knowledge, flying, and simulated flight training given to individual trainees; and
- (c) personal information, (expiry dates of medical certificates, ratings, etc.) related to TRTO's personnel.

19 The format of the trainee's training records shall be specified in the Training Manual.

20 The TRTO shall submit training records and reports as required by the Authority.

## TRAINING PROGRAMME

21 A training programme shall be developed for each type of course offered. This programme shall include a breakdown of flying and ground training in either a week-by-week or phase presentation, a list of standard exercises and a syllabus summary. In particular, synthetic flight training and theoretical knowledge instruction shall be phased in such a manner as to ensure that trainees shall be able to apply to flying exercises the knowledge gained on the ground. Arrangements should be made so that problems encountered in instruction can be resolved during subsequent flight training.

## TRAINING AEROPLANES

22 Each aeroplane must be equipped as required in the training specifications concerning the approved course in which it is used.

## FACILITIES

23 Suitable training facilities shall be provided.

## REQUIREMENTS FOR ENTRY TO TRAINING

24 The TRTOs shall be responsible for ensuring that trainees meet at least the pre-requisite conditions for type rating training as set out in JAR-FCL 1.250.

## TRAINING MANUAL AND OPERATIONS MANUAL

25 A TRTO shall provide and maintain a Training Manual and an Operations Manual containing information and instructions to enable staff to perform their duties and to give guidance to trainees on how to comply with course requirements. A TRTO shall make available to staff and, where appropriate, to trainees the information contained in the Training Manual, the Operations Manual and the TRTO's approval documentation. The amendment procedure shall be stated and amendments properly controlled.

26 The Training Manual shall state the standards, objectives and training goal for each phase of training that the trainees are required to comply with, including stating the entry requirements for each course, as applicable. It shall include the following:

Part 1 – The Training Plan

Part 2 – Briefing and Air Exercises

Part 3 – Synthetic Flight Training

Part 4 – Theoretical Knowledge Instruction

For further guidance see IEM No. 3 to JAR-FCL 1.055.

27 The Operations Manual shall provide relevant information to particular groups of staff, e.g. TRIs, synthetic flight instructors, ground instructors, operations and maintenance staff, etc. and shall contain the following:

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

For further guidance see IEM No. 3 to JAR-FCL 1.055.

**AMC FCL 1.055**

**Quality system for FTOs/TRTOs**

**See Appendix 1a and 2 to JAR–FCL 1.055**

**See IEM No. 1 to JAR–FCL 1.055**

1 In accordance with Appendix 1a and 2 to JAR–FCL 1.055, a FTO and a TRTO shall, as a condition for approval, establish and maintain a quality system. This AMC establishes the objectives of such a system, and offers a means of compliance as to which elements should be included and how the system can be integrated in the organisations.

2 The rationale for the requirements of quality systems is the need to establish a distinct assignment of roles between Authority and training organisations by creating an evident division between the regulatory and surveillance responsibility on the one hand, and responsibility of the training activities in itself on the other. Therefore the training organisations must establish a system whereby they can monitor their activities, be able to detect deviations from set rules and standards, take the necessary corrective actions and thus ensure compliance with Authority regulations and own requirements. A well established and functioning quality system will make it possible for the supervising Authority to perform inspections and surveillance efficiently and with a reasonable amount of resources.

3 It is obvious and well recognised that the scope and complexity of a quality system should reflect the size and complexity of the training organisation and its training activities. The objectives and the same principles apply, however, to any training organisation, irrespective of size and complexity. Thus, in small and relatively small training organisations, the quality system may be quite simple and integrated in the basic organisation, whereas larger organisations with more complex training activities will need to establish separate and independent quality organisations within the overall organisational set-up.

4 In determining size and complexity in this context the following guidelines apply:

training organisations with 5 or less instructors employed are considered very small;

training organisations employing between 6 and 20 instructors are considered small.

In determining complexity, factors such as number of aircraft types used for training, range of training courses offered, geographical spread of training activities (e.g. the use of satellites), range of training arrangements with other training organisations, etc. will be considered.

5 In a quality system of any FTO or TRTO the following five elements should be clearly identifiable:

- a. determination of the organisation's training policy and training and flight safety standards;
- b. determination and establishment of assignment of responsibility, resources, organisation and operational processes, which will make allowance for policy and training and flight safety standards;
- c. follow up system to ensure that policy, training and flight safety standards are complied with;
- d. registration and documentation of deviations from policy, training and flight safety standards together with necessary analysis, evaluations and correction of such deviations;
- e. evaluation of experiences and trends concerning policy, training and flight safety standards.

6 IEM No. 1 to JAR-FCL 1.055 describes in more detail objectives, the different elements of a quality system and offers guidance as to the set-up of quality systems in larger and/or more complex training organisations. For very small and small organisations paragraph 23 of IEM No. 1 to JAR-FCL 1.055 applies.

7 The Quality System required in JAR–FCL and in other JARs may be integrated.

**IEM No. 1 to JAR-FCL 1.055**  
**Quality system for FTOs/TRTOs**  
**See AMC FCL 1.055**

**INTRODUCTION**

A basis for quality should be established by every FTO/TRTO and problem-solving techniques to run processes should be applied. Knowledge in how to measure, establish and ultimately achieve quality in training and education is considered to be essential.

The purpose of this IEM is to provide information and guidance to the training organisations on how to establish a Quality System that enables compliance with Appendix 1a to JAR-FCL 1.055, item 3 and Appendix 2 to JAR-FCL 1.055, item 3 (Quality Systems).

In order to show compliance with Appendix 1a to JAR-FCL 1.055, item 3 and Appendix 2 to JAR-FCL 1.055, item 3, an FTO/TRTO should establish its Quality System in accordance with the instructions and information contained in the succeeding paragraphs.

**THE QUALITY SYSTEM OF THE FTO/TRTO**

**1 Terminology**

*Accountable Manager*

A person acceptable to the Authority who has authority for ensuring that all training activities can be financed and carried out to the standards required by the Authority, and additional requirements defined by the FTO/TRTO.

*Quality*

The totality of features and characteristics of a product or service that bear on its ability to satisfy stated or implied needs.

*Quality Assurance*

All those planned and systematic actions necessary to provide adequate confidence that all training activities satisfy given requirements, including the ones specified by the FTO/TRTO in relevant manuals.

*Quality Manager*

The manager, acceptable to the Authority, responsible for the management of the Quality System, monitoring function and requesting corrective actions.

*Quality Manual*

The document containing the relevant information pertaining to the operator's quality system and quality assurance programme.

*Quality Audit*

A systematic and independent examination to determine whether quality activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.

**2 Quality Policy and Strategy**

It is of vital importance that the FTO/TRTO describes how the organisation formulates, deploys, reviews its policy and strategy and turns it into plans and actions. A formal written Quality Policy Statement should be established that is a commitment by the Head of Training as to what the Quality System is intended to achieve. The Quality Policy should reflect the achievement and continued compliance with relevant parts of JAR-FCL together with any additional standards specified by the FTO/TRTO.

The Accountable Manager will have overall responsibility for the Quality System including the frequency, format and structure of the internal management evaluation activities.

**3 Purpose of a Quality System**

The implementation and employment of a Quality System will enable the FTO/TRTO to monitor compliance with relevant parts of JAR-FCL, the Operations Manual, the Training Manual, and any other standards as established by that FTO/TRTO, or the Authority, to ensure safe and efficient training.

**4 Quality Manager**

- 4.1 The primary role of the Quality Manager is to verify, by monitoring activities in the field of training, that the standards required by the Authority, and any additional requirements as established by the FTO/TRTO, are being carried out properly under the supervision of the Head of Training, the Chief Flying Instructor and the Chief Ground Instructor.
- 4.2 The Quality Manager should be responsible for ensuring that the Quality Assurance Programme is properly implemented, maintained and continuously reviewed and improved. The Quality Manager should:
- have direct access to the Head of Training;
  - have access to all parts of the FTO/TRTO's organisation.
- 4.3 In the case of small or very small FTO/TRTOs, the posts of the Head of Training and the Quality Manager may be combined. However, in this event, quality audits should be conducted by independent personnel. In the case of a training organisation offering integrated training the Quality Manager should not hold the position of Head of Training, Chief Flying Instructor and Chief Ground Instructor.

## 5 **Quality System**

- 5.1 The Quality System of the FTO/TRTO should ensure compliance with and adequacy of training activities requirements, standards and procedures.
- 5.2 The FTO/TRTO should specify the basic structure of the Quality System applicable to all training activities conducted.
- 5.3 The Quality System should be structured according to the size of the FTO/TRTO and the complexity of the training to be monitored.

## 6 **Scope**

A Quality System should address the following:

- 6.1 Leadership
- 6.2 Policy and Strategy
- 6.3 Processes
- 6.4 The provisions of JAR–FCL
- 6.5 Additional standards and training procedures as stated by the FTO/TRTO
- 6.6 The organisational structure of the FTO/TRTO
- 6.7 Responsibility for the development, establishment and management of the Quality System
- 6.8 Documentation, including manuals, reports and records
- 6.9 Quality Assurance Programme
- 6.10 The required financial, material, and human resources
- 6.11 Training requirements
- 6.12 Customer satisfaction

## 7 **Feedback System**

The quality system should include a feedback system to ensure that corrective actions are both identified and promptly addressed. The feedback system should also specify who is required to rectify discrepancies and non-compliance in each particular case, and the procedure to be followed if corrective action is not completed within an appropriate timescale.

## 8 **Documentation**

Relevant documentation includes the relevant part(s) of the Training and Operations Manual, which may be included in a separate Quality Manual.

8.1 In addition relevant documentation should also include the following:

Quality Policy;  
Terminology;  
Specified training standards;  
A description of the organisation;  
The allocation of duties and responsibilities;  
Training procedures to ensure regulatory compliance.

8.2 The Quality Assurance Programme, reflecting:

Schedule of the monitoring process;  
Audit procedures;  
Reporting procedures;  
Follow-up and corrective action procedures;  
Recording system;  
The training syllabus; and  
Document control.

## 9 **Quality Assurance Programme**

The Quality Assurance Programme should include all planned and systematic actions necessary to provide confidence that all training are conducted in accordance with all applicable requirements, standards and procedures.

## 10 **Quality Inspection**

The primary purpose of a quality inspection is to observe a particular event/action/document etc., in order to verify whether established training procedures and requirements are followed during the accomplishment of that event and whether the required standard is achieved.

Typical subject areas for quality inspections are:

Actual flight and ground training;  
Maintenance;  
Technical Standards; and  
Training Standards.

11 **Audit**

An audit is a systematic, and independent comparison of the way in which a training is being conducted against the way in which the published training procedures say it should be conducted.

Audits should include at least the following quality procedures and processes:

An explanation of the scope of the audit;  
Planning and preparation;  
Gathering and recording evidence; and  
Analysis of the evidence.

The various techniques that make up an effective audit are:

Interviews or discussions with personnel;  
A review of published documents;  
The examination of an adequate sample of records;  
The witnessing of the activities which make up the training; and  
The preservation of documents and the recording of observations.

12 **Auditors**

The FTO/TRTO should decide, depending on the complexity of the training, whether to make use of a dedicated audit team or a single auditor. In any event, the auditor or audit team should have relevant training and/or operational experience.

The responsibilities of the auditors should be clearly defined in the relevant documentation.

13 **Auditor's Independence**

Auditors should not have any day-to-day involvement in the area of the operation or maintenance activity which is to be audited. An FTO/TRTO may, in addition to using the services of full-time dedicated personnel belonging to a separate quality department, undertake the monitoring of specific areas or activities by the use of part-time auditors.

An FTO/TRTO whose structure and size does not justify the establishment of full-time auditors, may undertake the audit function by the use of part-time personnel from within his own organisation or from an external source under the terms of an agreement acceptable to the Authority.

In all cases the FTO/TRTO should develop suitable procedures to ensure that persons directly responsible for the activities to be audited are not selected as part of the auditing team. Where external auditors are used, it is essential that any external specialist is familiar with the type of training conducted by the FTO/TRTO.

The Quality Assurance Programme of the FTO/TRTO should identify the persons within the company who have the experience, responsibility and authority to:

- Perform quality inspections and audits as part of ongoing Quality Assurance;
- Identify and record any concerns or findings, and the evidence necessary to substantiate such concerns or findings;
- Initiate or recommend solutions to concerns or findings through designated reporting channels;
- Verify the implementation of solutions within specific timescales;
- Report directly to the Quality Manager.

#### 14 **Audit Scope**

FTO/TRTOs are required to monitor compliance with the training and Operations Manuals they have designed to ensure safe and efficient training. In doing so they should as a minimum, and where appropriate, monitor:

- (a) Organisation;
- (b) Plans and objectives;
- (c) Training Procedures;
- (d) Flight Safety;
- (e) Manuals, Logs, and Records;
- (f) Flight and Duty Time Limitations,
- (g) Rest Requirements, and Scheduling;
- (h) Aircraft Maintenance/Operations interface;
- (i) Maintenance Programmes and Continued Airworthiness;
- (j) Airworthiness Directives management;
- (k) Maintenance Accomplishment.

#### 15 **Audit Scheduling**

A Quality Assurance Programme should include a defined audit schedule and a periodic review cycle. The schedule should be flexible, and allow unscheduled audits when trends are identified. Follow-up audits should be scheduled when necessary to verify that corrective action was carried out and that it was effective.

An FTO/TRTO should establish a schedule of audits to be completed during a specific calendar period. All aspects of the training should be reviewed within a period of 12 months in accordance with the programme unless an extension to the audit period is accepted as explained below.

An FTO/TRTO may increase the frequency of their audits at their discretion but should not decrease the frequency without the acceptance of the Authority. It is considered unlikely that a period of greater than 24 months would be acceptable for any audit topic.

When an FTO/TRTO defines the audit schedule, significant changes to the management, organisation, training, or technologies should be considered, as well as changes to the regulatory requirements.

#### 16 **Monitoring and Corrective Action**

The aim of monitoring within the Quality System is primarily to investigate and judge its effectiveness and thereby to ensure that defined policy, training standards are continuously complied with. Monitoring activity is based upon quality inspections, audits, corrective action and follow-up. The FTO/TRTO should establish and publish a quality procedure to monitor regulatory compliance on a continuing basis. This monitoring activity should be aimed at eliminating the causes of unsatisfactory performance.

Any non-compliance identified should be communicated to the manager responsible for taking corrective action or, if appropriate, the Accountable Manager. Such non-compliance should be recorded, for the purpose of further investigation, in order to determine the cause and to enable the recommendation of appropriate corrective action.

The Quality Assurance Programme should include procedures to ensure that corrective actions are developed in response to findings. These quality procedures should monitor such actions to verify their effectiveness and that they have been completed. Organisational responsibility and accountability for the implementation of corrective action resides with the department cited in the report identifying the finding. The Accountable Manager will have the ultimate responsibility for ensuring, through the Quality Manager(s), that corrective action has re-established compliance with the standard required by the Authority and any additional requirements established by the FTO/TRTO.

## 17 **Corrective action**

Subsequent to the quality inspection/audit, the FTO/TRTO should establish:

- (a) The seriousness of any findings and any need for immediate corrective action;
- (b) The origin of the finding;
- (c) What corrective actions are required to ensure that the non-compliance does not recur;
- (d) A schedule for corrective action;
- (e) The identification of individuals or departments responsible for implementing corrective action;
- (f) Allocation of resources by the Accountable Manager where appropriate.

### 17.1 The Quality Manager should:

- 17.1.1 Verify that corrective action is taken by the manager responsible in response to any finding of non-compliance;
- 17.1.2 Verify that corrective action includes the elements outlined in paragraph 16 above;
- 17.1.3 Monitor the implementation and completion of corrective action;
- 17.1.4 Provide management with an independent assessment of corrective action, implementation and completion;
- 17.1.5 Evaluate the effectiveness of corrective action through the follow-up process.

## 18 **Management Evaluation**

A management evaluation is a comprehensive, systematic documented review by the management of the quality system, training policies, and procedures, and should consider:

The results of quality inspections, audits and any other indicators; as well as the overall effectiveness of the management organisation in achieving stated objectives. A management evaluation should identify and correct trends, and prevent, where possible, future non-conformities. Conclusions and recommendations made as a result of an evaluation should be submitted in writing to the responsible manager for action. The responsible manager should be an individual who has the authority to resolve issues and take action. The Accountable Manager should decide upon the frequency, format, and structure of internal management evaluation activities.

## 19 **Recording**

Accurate, complete, and readily accessible records documenting the results of the Quality Assurance Programme should be maintained by the FTO/TRTO. Records are essential data to enable an FTO/TRTO to analyse and determine the root causes of non-conformity, so that areas of non-compliance can be identified and subsequently addressed.

The following records should be retained for a period of 5 years:

- Audit Schedules;
- Quality inspection and Audit reports;
- Responses to findings;
- Corrective action reports;
- Follow-up and closure reports;
- Management Evaluation reports.

## 20 **Quality Assurance Responsibility for Sub-Contractors**

An FTO/TRTO may decide to sub-contract out certain activities to external organisations subject to the approval of the Authority.

The ultimate responsibility for the training provided by the subcontractor always remains with the FTO/TRTO. A written agreement should exist between the FTO/TRTO and the sub-contractor clearly defining the safety related services and quality to be provided. The sub-contractor's safety related activities relevant to the agreement should be included in the FTO/TRTO's Quality Assurance Programme.

The FTO/TRTO should ensure that the sub-contractor has the necessary authorisation/approval when required, and commands the resources and competence to undertake the task. If the FTO/TRTO requires the sub-contractor to conduct activity which exceeds the sub-contractor's authorisation/approval, the FTO/TRTO is responsible for ensuring that the sub-contractor's quality assurance takes account of such additional requirements.

## 21 **Quality System Training**

Correct and thorough training is essential to optimise quality in every organisation. In order to achieve significant outcomes of such training the FTO/TRTO should ensure that all staff understand the objectives as laid down in the Quality Manual.

Those responsible for managing the Quality System should receive training covering:

- An introduction to the concept of Quality System;
- Quality management;
- Concept of Quality Assurance;
- Quality manuals;
- Audit techniques;
- Reporting and recording; and
- The way in which the Quality System will function in the FTO/TRTO.

Time should be provided to train every individual involved in quality management and for briefing the remainder of the employees. The allocation of time and resources should be governed by the size and complexity of the operation concerned.

## 22 **Sources of Training**

Quality management courses are available from the various National or International Standards Institutions, and an FTO/TRTO should consider whether to offer such courses to those likely to be involved in the management of Quality Systems. Organisations with sufficient appropriately qualified staff should consider whether to carry out in-house training.

23 **Quality Systems for small/very small Organisations**

The requirement to establish and document a Quality System, and to employ a Quality Manager applies to all FTO/TRTOs.

Complex quality systems could be inappropriate for small or very small FTO/TRTOs and the clerical effort required to draw up manuals and quality procedures for a complex system may stretch their resources. It is therefore accepted that such FTO/TRTOs should tailor their quality systems to suit the size and complexity of their training and allocate resources accordingly.

For small and very small FTO/TRTOs it may be appropriate to develop a Quality Assurance Programme that employs a checklist. The checklist should have a supporting schedule that requires completion of all checklist items within a specified timescale, together with a statement acknowledging completion of a periodic review by top management. An occasional independent overview of the checklist content and achievement of the Quality Assurance should be undertaken.

The small FTO/TRTO may decide to use internal or external auditors or a combination of the two. In these circumstances it would be acceptable for external specialists and or qualified organisations to perform the quality audits on behalf of the Quality Manager.

If the independent quality audit function is being conducted by external auditors, the audit schedule should be shown in the relevant documentation.

Whatever arrangements are made, the FTO/TRTO retains the ultimate responsibility for the quality system and especially the completion and follow-up of corrective actions.