

Advisory Pamphlet

ATO Quality System

AP 1.5.018A



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1. Purpose

- 1.1. The objective of a quality assurance system is to ensure the achievement of results that conform to the standards set out in the ATO's manuals and in requirements and documents issued by the Licensing Authority, thus promoting continual improvement in the quality of training provided

2. Reference Material

2.1. Regulatory Requirements

2.1.1. ANR.ATO

2.2. Reference Material

2.2.1. Annex 1 – Appendix 2

3. Guidance and Procedures

3.1. QUALITY POLICY AND STRATEGY

3.1.1. The ATO shall describe how the organization formulates, deploys and reviews its policy and strategy and turns it into plans and actions applicable to all levels of the organization. A formal written quality policy statement should be prepared, establishing a commitment by the head of the training organization as to the goals of the quality assurance system. The quality policy should reflect the achievement and continued compliance with relevant parts of Appendix 2 to Annex 1, together with any additional standards specified by the ATO.

3.1.2. The accountable manager of the training organization will have the overall responsibility for the quality assurance system including the frequency, format and structure of the internal management review and analysis activities and may delegate the responsibility for the tasks defined under paragraph 2 of this Appendix to a quality manager. Depending on the size and scope of the organization and the requirements of the Licensing Authority, the accountable manager and quality manager may

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interact in different ways as illustrated in the organizational charts in Appendix C.

3.2. QUALITY MANAGER

3.2.1. The primary role of the quality manager is to verify, by monitoring activities in the field of training, that the standards as established by the ATO and any additional requirements of the Licensing Authority are being carried out properly.

3.2.2. The quality manager should be responsible for ensuring that the quality assurance system is properly implemented, maintained and continuously reviewed and improved.

3.2.3. The quality manager should:

- have direct access to the accountable manager; and
- have access to all parts of the ATO.

3.2.4. The quality manager should be responsible for ensuring that personnel training relating to the quality assurance system is conducted.

3.3. QUALITY ASSURANCE SYSTEM

3.3.1. The quality assurance system of the ATO should ensure compliance with requirements, conformity with standards and adequacy of the training activities conducted.

3.3.2. Every process that assists the ATO to achieve its results should be identified and the activities and procedures documented.

3.3.3. The ATO should specify the basic structure of the quality assurance system applicable to all training activities conducted.

3.4. FEEDBACK SYSTEM

3.4.1. The quality assurance 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-conformity in each particular case and the procedure to be followed if corrective

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action is not completed within an appropriate timescale.

3.5. DOCUMENTATION

3.5.1. Relevant documentation includes the part(s) of the Training and Procedures Manual which may be included in a separate quality manual.

3.5.2. In addition, relevant documentation should also include the following:

- 3.5.2.1. quality policy;
- 3.5.2.2. terminology;
- 3.5.2.3. specified training standards;
- 3.5.2.4. a description of the organization;
- 3.5.2.5. the allocation of duties and responsibilities; and
- 3.5.2.6. training procedures to ensure regulatory compliance.

3.5.3. The quality assurance audit programme documentation should reflect:

- 3.5.3.1. the schedule of the monitoring process;
- 3.5.3.2. audit procedures;
- 3.5.3.3. reporting procedures;
- 3.5.3.4. follow-up and corrective action procedures;
- 3.5.3.5. the recording system; and
- 3.5.3.6. document control.

3.6. QUALITY ASSURANCE AUDIT PROGRAMME

3.6.1. The quality assurance audit programme should include all planned and systematic actions necessary to provide confidence that all training is conducted in accordance with all applicable requirements, standards and procedures.

3.7. QUALITY INSPECTION

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3.7.1. 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.

3.7.2. Typical subject areas for quality inspections could be:

3.7.2.1. actual flight and ground training;

3.7.2.2. maintenance;

3.7.2.3. technical standards; and

3.7.2.4. training standards.

3.8. AUDIT

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

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

3.8.2.1. an explanation of the scope of the audit;

3.8.2.2. planning and preparation;

3.8.2.3. gathering and recording evidence; and

3.8.2.4. analysis of the evidence.

3.8.3. The various techniques that make up an effective audit are:

3.8.3.1. interviews or discussions with personnel;

3.8.3.2. a review of published documents;

3.8.3.3. the examination of an adequate sample of records;

3.8.3.4. the witnessing of the activities which make up the training; and

3.8.3.5. the preservation of documents and the recording of observations.

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3.9. AUDITORS

- 3.9.1. The ATO 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.
- 3.9.2. The responsibilities of the auditors should be clearly defined in the relevant documentation.

3.10. AUDITOR'S INDEPENDENCE

- 3.10.1. Auditors should not have any day-to-day involvement in the area of the operation or maintenance activity that is to be audited. An ATO 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 through the use of part-time auditors.
- 3.10.2. An ATO 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 its own organization or from an external source under the terms of an agreement acceptable to the Licensing Authority.
- 3.10.3. In all cases the ATO 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 be familiar with the type of training conducted by the ATO.
- 3.10.4. The quality assurance audit programme of the ATO should identify the persons within the organization who have the experience, responsibility and authority to:
- 3.10.4.1. perform quality inspections and audits as part of ongoing quality assurance;
 - 3.10.4.2. identify and record any concerns or findings, and the evidence necessary to substantiate such concerns or findings;

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3.10.4.3. initiate or recommend solutions to concerns or findings through designated reporting channels;

3.10.4.4. verify the implementation of solutions within specific timescales; and

3.10.4.5. report directly to the quality manager.

3.11. AUDIT SCHEDULING

3.11.1. A quality assurance audit programme should include a defined audit schedule and a periodic review cycle. The schedule should be flexible and allow unscheduled audits when negative trends are identified. The quality manager should schedule follow-up audits when necessary to verify that corrective action was carried out and that it was effective.

3.11.2. An ATO 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 twelve months in accordance with the programme.

3.11.3. When an ATO defines the audit schedule, it should take into account significant changes to the management, organization, training or technologies, as well as changes to the standards and requirements.

3.12. MONITORING AND CORRECTIVE ACTION

3.12.1. The aim of monitoring within the quality system is primarily to investigate and judge its effectiveness and thereby ensure that defined policy and training standards are continuously complied with. Monitoring and corrective action functions fall under the responsibilities of the quality manager. Monitoring activity is based upon quality inspections, audits, corrective action and follow-up. The ATO should establish and publish a quality procedure to monitor compliance with requirements and conformity with standards on a continuing basis. This monitoring activity should be aimed at eliminating the causes of unsatisfactory performance.

3.12.2. Any non-conformity identified as a result of monitoring should be communicated by the quality



manager to the manager responsible for taking corrective action or, if appropriate, the head of the training organization (i.e. accountable manager). Such non-conformity should be recorded, for the purpose of further investigation, in order to determine the cause and to enable the recommendation of appropriate corrective and preventive action.

3.12.3. The quality assurance audit programme should include procedures to ensure that corrective and preventive actions are developed in response to findings. Personnel implementing these procedures should monitor such actions to verify their effectiveness and ensure that they have been completed.

Organizational responsibility and accountability for the implementation of corrective action resides with the department where the finding was identified. The head of the training organization (accountable manager) will have the ultimate responsibility for ensuring, through the quality manager(s), that corrective action has re-established conformity with the standard required by the ATO and any additional requirements established by the Licensing Authority or the ATO.

3.12.4. The ATO should identify internal and external customers and monitor their satisfaction by measurement and analysis of feedback.

3.13. MANAGEMENT REVIEW AND ANALYSIS

3.13.1. Management should accomplish a comprehensive, systematic documented review and analysis of the quality assurance system, training policies and procedures, and should consider:

3.13.1.1. the results of quality inspections, audits and any other indicators

3.13.1.2. the overall effectiveness of the management organization in achieving stated objectives; and

3.13.1.3. the correction of trends, and prevention, where applicable, of future non-conformities.

3.13.2. Conclusions and recommendations made as a result of the review and analysis should be submitted in writing to the responsible manager for action. The

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responsible manager should be an individual who has the authority to resolve issues and take action. The head of the training organization should decide upon the frequency, format and structure of internal review and critical analysis meetings.

3.14. RECORDING

3.14.1. Accurate, complete and readily accessible records documenting the result of the quality assurance audit programme should be maintained by the ATO. Records are essential data to enable an ATO to analyse and determine the root causes of non-conformity so that areas of non-compliance can be identified and subsequently addressed.

3.14.2. Records should be retained at least for the period that may be mandated by national requirements. In the absence of such requirements, a period of three years is recommended. The relevant records include:

- 3.14.2.1. audit schedules;
- 3.14.2.2. quality inspection and audit reports;
- 3.14.2.3. responses to findings;
- 3.14.2.4. corrective and preventive action reports;
- 3.14.2.5. follow-up and closure reports; and
- 3.14.2.6. management review and analysis reports.

3.15. QUALITY ASSURANCE RESPONSIBILITY FOR SATELLITE ATOS

3.15.1. An ATO may decide to subcontract certain activities to external organizations subject to the approval of the Licensing Authority.

3.15.2. The ultimate responsibility for the training provided by the satellite ATO always remains with the ATO. A written agreement should exist between the ATO and the satellite ATO clearly defining the safety-related services to be provided and the level of quality to be assured. The satellite ATO's safety-related activities relevant to the agreement should be included in the ATO's quality assurance audit programme.

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3.15.3. The ATO should ensure that the satellite ATO has the necessary authorization/approval when required and commands the resources and competence to undertake the task. If the ATO requires the satellite ATO to conduct activity that exceeds the satellite ATO's authorization/approval, the ATO is responsible for ensuring that the satellite ATO's quality assurance takes account of such additional requirements.

3.16. QUALITY ASSURANCE SYSTEM TRAINING

3.16.1. Correct and thorough training is essential to optimize quality in every organization. In order to achieve significant outcomes of such training, the ATO should ensure that all staff understand the objectives as laid out in the quality manual.

3.16.2. Those responsible for managing the quality assurance system should receive training covering:

- 3.16.2.1. concept of quality assurance and associated systems;
- 3.16.2.2. quality management;
- 3.16.2.3. quality manuals;
- 3.16.2.4. audit techniques; and
- 3.16.2.5. reporting and recording.

3.17. THE FUNCTIONING OF THE QUALITY SYSTEM IN THE ATO

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

3.18. SOURCES OF PERSONNEL TRAINING

3.18.1. Quality assurance courses are available from the various national or international standards institutions, and an ATO should consider whether to offer such courses to those likely to be involved in the management of the quality assurance system. Organizations with sufficient appropriately qualified

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staff should consider the possibility of carrying out in-house training.