Part-ORA

Subparts GEN and ATO

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ORA.GEN contains the general provisions that are applicable to all approved organisations

- Section I: GENERAL
- Section II: MANAGEMENT

These are complemented with following ATO specific provisions

Part-ORA Subpart ATO

ORA.ATO Specific requirements related to Approved Training Organisations

- Section I: GENERAL
- Section II: Additional requirements for ATOs providing training for CPL, MPL, ATPL & associated ratings and certificates
- Section III: Additional requirements for ATOs providing specific types of training

Part-ORA Subpart GEN Section I

Paragraph	Title
ORA.GEN.105	Competent authority
ORA.GEN.115	Application for an organisation certificate
ORA.GEN.120	Means of compliance
ORA.GEN.125	Terms of approval and privileges of an organisation
ORA.GEN.130	Changes to organisations
ORA.GEN.135	Continued validity
ORA.GEN.140	Access
ORA.GEN.150	Findings
ORA.GEN.155	Immediate reaction to a safety problem
ORA.GEN.160	Occurrence Reporting

ORA.GEN.105 Competent authority

- organisations in Member States

-> authority designated by the Member State

- organisations in third countries

-> the Agency

General ORs for ATOs - HIGHLIGHTS

ORA.GEN.120

Alternative means of compliance: need to demonstrate to competent authority how the safety objective will be met

AMC1-ORA.GEN.120(e)

- risk assessment should be completed

- should demonstrate that an equivalent level of safety is reached

ORA.GEN.115

Application for organisation certificate

- competent authority develops the procedures

- the organisation shall provide documentation including procedure how changes **not requiring prior approval** will be managed and notified

ORA.GEN.130 Changes

Changes requiring prior approval :

- changes to the scope of certificate

- changes to the terms of approval (list of training courses and FSTDs used)

- changes in the organisation's management: lines of responsibility and accountability

- changes in the safety policy

- additional changes as agreed upon initial certification (procedure)

Continued validity and granting access

- no expiry date in the certificate

- organisation needs to remain in compliance with the relevant regulation

- authority having access to determine the continued compliance

  - any facility, aircraft, document, records, data, procedures, other relevant material

- organisation shall identify the root cause of possible finding, define action plan and demonstrate corrective action

ORA.GEN.155 Immediate reaction to a safety problem

The organisation shall implement:

- any safety measures mandated by the competent authority (ARA.GEN.135)
- mandatory safety information issued by the Agency (ADs and OSD related directives)

ORA.GEN.160 Occurrence reporting

- in a form and manner established by the competent authority
- as soon as practicable, but in any case within 72 hours (unless exceptional circumstances prevent it)

Part-ORA Subpart GEN Section II

Paragraph	Title
ORA.GEN.200	Management system
ORA.GEN.205	Contracted activities
ORA.GEN.210	Personnel requirements
ORA.GEN.215	Facility requirements
ORA.GEN.220	Record-keeping

Safety Management System

ICAO Definitions

- **SMS:** A systematic approach to managing safety, including the necessary organizational structures, accountabilities, policies and procedures.

- **Safety.** The state in which risks associated with aviation activities are reduced and controlled to an acceptable level.

- **Safety risk.** The predicted likelihood and severity of the consequences or outcomes of a hazard.

- **Hazard.** A condition or an object with the potential to cause death, injuries to personnel, damage to equipment or structures, loss of material, or reduction of ability to perform a prescribed function.

Safety Management System

In other words

- a safety management system is a series of defined, organisation-wide processes that provide for **effective risk-based decision-making** related to the organisation's daily business

- globally speaking, SMS focuses on **maximizing opportunities to continuously improve the overall safety of the aviation system**

Why do we need one?

- *the complexity of the aviation system requires systematic, proactive, performance based management of safety that should be fully integrated with operations*

- *compliance with regulations alone does not ensure safety*

- *organisations need management systems that allow them to identify random causes of potential accidents & incidents (regulations cannot capture these)*

- **ORs do not explicitly refer to SMS. Section II of Part-ORA Subpart GEN deals with "management system"**

- **ORA.GEN.200 and related AMCs/GM set out what is needed in terms of management system. These, together with the relevant provisions of the Basic Regulation, provide for compliance with the relevant ICAO SARPS on SMS**

Integrated approach

SMS should not be implemented through an additional management system requirement superimposed onto the existing rules, but be fully integrated in the organisation's existing management system.
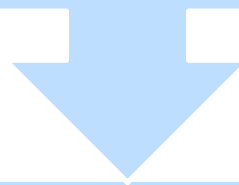
Safety management should include every facet of management that may impact aviation safety

(financial, operational, health and safety, etc…).

Safety, as well as compliance with rules, should be a concern for all personnel and for all activities of an organisation.

Management system in a nutshell

- clearly defined lines of **responsibility and accountability**

- **safety policy**

- **identification** of aviation **safety hazards**, their **evaluation** and the **management of associated risks**, actions to **mitigate the risk** and **verify their effectiveness**

- maintaining **personnel** trained and competent

- **documentation** of all management system key processes

- function to monitor **compliance** of the organisation, including a **feedback system**

Proportionality

The management system shall correspond to the size of the organisation and the complexity of its activities, taking into account the hazards and associated risks inherent in these activities.

(see also ICAO Annex 6 Appendix 7)
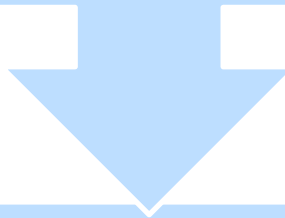
How is this achieved?

different sets of AMCs for "complex" and "non-complex" organisations	details of SMS implementation are contained as AMC

Definition of organisational complexity - three criteria (AMC1 ORA.GEN.200(b))

- size, in terms of staffing (>20 FTEs)

- complexity of the activities
  - number of operating sites,
  - number and type of contractors, ..

- risks involved
  - type of operations, e.g. specialised operations (helicopter hoist)
  - different types of aircraft
  - operating environment (mountainous areas, offshore, ..)

Organisations may use means alternative to those established in the AMC issued by the Agency:

"alternative means of compliance"

➢ organisations need to apply to their competent authority and demonstrate that an equivalent level of safety can be reached

➢ they may use alternative means of compliance only after approved by the competent authority

NOTE: authorities will notify the Agency of the alternative means they have approved

Non-complex organisations

Management system in short:

- hazard checklist
- safety risks related to change
- safety manager (can be also AC)
- responsibilities in relation to hazard identification, risk assessment and mitigation
- safety policy
- emergency response plan (ERP)

Organisation and accountabilities

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                    ┌─────────────────────────┐
                    │   Organisational        │
                    │   structure for SMS     │
                    └─────────────────────────┘
             ┌─────────────┴─────────────┐
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Safety Manager	Safety Review Board - **Accountable Manager** - Heads of functional areas

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                                 ┌───────┴────────────┐
                                 │  Safety Action Group │
                                 └─────────────────────┘
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Accountable Manager
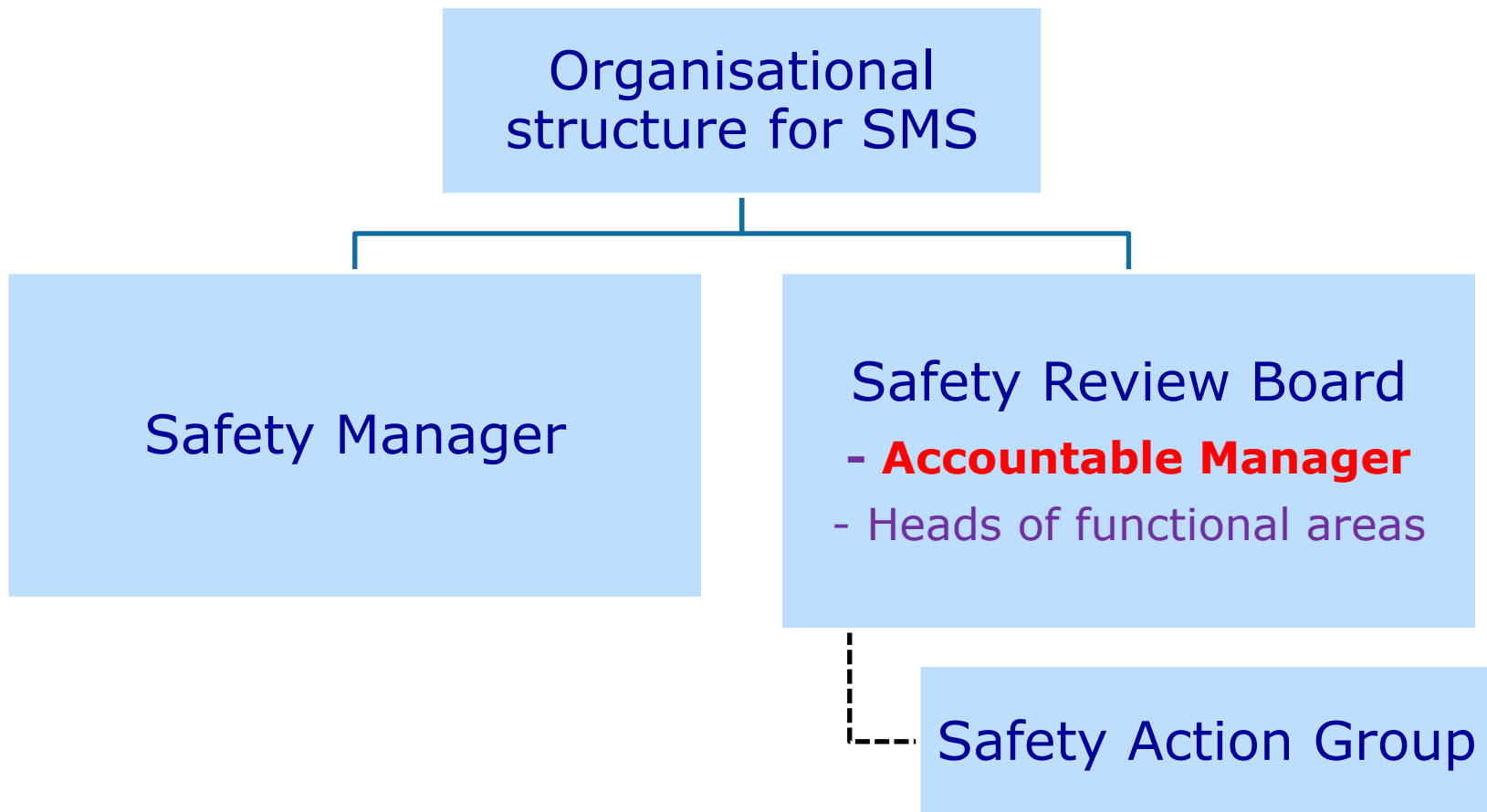
Responsibilities:

- actions can be financed
- actions can be carried out in accordance with the regulations
- effective management system is established and maintained

Safety Manager

Functions of the safety manager:

1. facilitate hazard identification, risk analysis and management;

2. monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan;

3. provide periodic reports on safety performance;

4. ensure maintenance of safety management documentation;

5. ensure that there is safety management training available and that it meets acceptable standards;

6. provide advice on safety matters; and

7. initiate and participate in internal occurrence / accident investigations.

Safety Review Board (SRB)

- high level committee – considers matters of strategic safety & ensure appropriate resources are allocated to achieve safety objectives

- monitors:
  - safety performance
  - safety actions
  - safety management processes remains effective

Safety Action Group

Optional

- may be established as a standing group or as an ad-hoc group to assist or act on behalf of the SRB.

- more than one safety action group may be established depending on the scope of the task and specific expertise required.

- a safety action group should report to and take strategic direction from the safety review board and should be comprised of managers, supervisors and personnel from operational areas.

e.g. to assess impact on safety of operational changes

SAFETY POLICY

The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident as far as is reasonably practicable.

starting point to ensure efficacy and efficiency of the organisation's SMS

SAFETY RISK MANAGEMENT (1/2)

- Hazard identification processes
  - reactive and proactive

- Risk assessment and mitigation processes
  - analysis, assessment and control of risks

- Internal safety investigation following occurrences

- Safety performance monitoring and measurement
  - combination of safety reporting, safety studies, safety reviews, safety audits, safety surveys

SAFETY RISK MANAGEMENT (2/2)

- Management of change
  - identify, assess and manage

- Continuous improvement
  - reactive and proactive evaluation (audits and surveys)
  - also individual's performance and effectiveness of the system

- Emergency Response Plan
  - actions to be taken in case of an emergency
  - co-ordination with ERPs of other organisations where appropriate

INTERNAL OCCURRENCE REPORTING SCHEME

- one element of the hazard identification process

- to identify instances where routine procedures have failed
    - assessment of safety implications to determine need for action
    - dissemination of information regarding relevant incidents and accidents
    - reactive evaluation of effectiveness of risk controls
    - all reports to be retained, as significance may only become obvious at a later stage

- improved the safety performance without attributing blame

SAFETY MANAGEMENT MANUAL

Key instrument for communicating the approach to safety for the whole of the organisation, to document all aspects of safety management:

1. *scope of the safety management system;*
2. *safety policy and objectives;*
3. *safety accountability of the accountable manager;*
4. *safety responsibilities of key safety personnel;*
5. *hazard identification and risk management schemes;*
6. *safety action planning;*
7. *safety performance monitoring;*
8. *incident investigation and reporting;*
9. *emergency response planning;*
10. *management of change*
11. *safety promotion.*

ORGANISATION MANAGEMENT SYSTEM DOCUMENTATION

The information may be contained in any of the organisation manuals

- safety management manual
- operations manual
- training manual

These manuals may also be combined.

> It is not required to duplicate information in several manuals, however the organisation must be able to demonstrate that all items are covered

COMPLIANCE MONITORING FUNCTION

Accountable manager to designate a compliance monitoring manager (CMM)

Functions of the CMM:

- verify that all applicable standards are complied with
- verify that the organisation's own requirements (policies and procedures) are complied with
- ensure that a compliance monitoring programme is implemented and continually reviewed & improved

The same person may act as CMM and SMM

Non-complex ATOs: AM can be the CMM

COMPLIANCE MONITORING PROGRAMME

➤ Typical subject areas for compliance monitoring inspections for ATOs should be:

  ➤ facilities;

  ➤ actual flight and ground training;

  ➤ technical standards.

➤ ATOs should monitor compliance with the training and operations manuals they have designed to ensure safe and efficient training.

➤ No provisions on audit planning cycles

➤ CM according to size of the organisation and its complexity
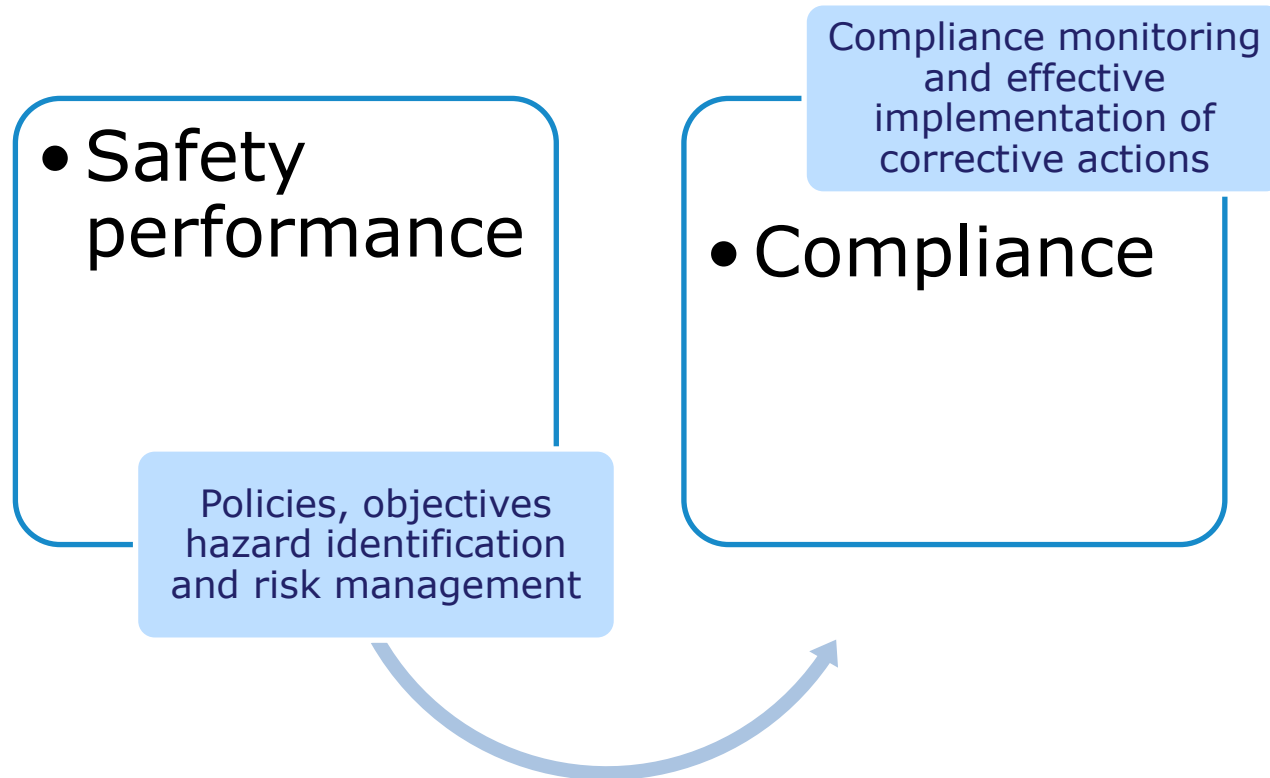
➤ dynamic planning (performance based)

COMPLIANCE MONITORING RESPONSIBILITY WHEN CONTRACTING ACTIVITIES

➤ contracted safety related activities should be included in the organisation's compliance monitoring programme

➤ organisation to ensure that the contracted organisation has the necessary authorisation or approval when required, and commands the resources and competence to undertake the task

(same as in IEM No. 1 to JAR-FCL 1.055)

Compliance monitoring versus quality system

ORA.GEN.200 requires a management system with two core components. These are compatible with quality management systems, such as ISO 9001.

- Safety performance

- Compliance

Compliance monitoring and effective implementation of corrective actions

Policies, objectives hazard identification and risk management

ORA.ATO Section I

ORA.ATO.100 Scope

ORA.ATO.105 Application

ORA.ATO.110 Personnel requirements

ORA.ATO.120 Record keeping

ORA.ATO.125 Training Programme

ORA.ATO.130 Training Manual & Operations Manual

ORA.ATO.135 Training aircraft & FSTDs

ORA.ATO.140 Aerodromes & Operating Sites

ORA.ATO.145 Pre-requisites for training

ORA.ATO.150 Training in Third Countries

Specific ORs for ATOs – HIGHLIGHTS

ORA.ATO.105 Application

- Information / documents to be provided to the competent authority
- Relevant information in the case of a change to the certificate
- Application form in the AMC

Specific ORs for ATOs – HIGHLIGHTS

ORA.ATO.110 Personnel requirements

- HT nomination & responsibilities

- Requirements for instructors

ORA.ATO.120 Record keeping

- Records shall be kept for 3 years after completion of the training

- flight training, progress reports, information on licences and medical certificates

Specific ORs for ATOs – HIGHLIGHTS

ORA.ATO.125 Training Programme

- Shall be developed for each type of course offered

ORA.ATO.130 Training and operations manual

- shall be established and maintained

- Flight time limitation schemes for instructors in accordance with Part-ORO

Specific ORs for ATOs – HIGHLIGHTS

ORA.ATO.135 Training aircraft & FSTDs

- Adequate fleet of aircraft or FSTDs

- FSTDs adequate to training

ORA.ATO.140 Aerodromes and operating sites manual

- Appropriate characteristics and facilities

ORA.ATO.150 Training in third countries

- IR training provided in third countries a familiarisation flight has to be carried out IR skill test has to be taken in one MS

ORA.ATO Section II

ATOs providing training for licences and ratings other than LAPL, PPL, SPL or BPL

ORA.ATO.210 Personnel requirements

ORA.ATO.225 Training Programme

ORA.ATO.230 Training Manual & Operations Manual

Specific ORs for ATOs – HIGHLIGHTS

ORA.ATO.210 Personnel requirements

- Head of Training (HT)
- Chief Flight Instructor (CFI) and
- Chief Theoretical Knowledge Instructor specified (CTKI)

- experience and licence requirements
- responsibilities

ORA.ATO.225 Training Programme

- shall include a breakdown of flight and TK instruction

Training manual and Operations manual

- training manual shall state the standards, objectives and training goals

  - see also AMC1 ORA.ATO.230(a)

- operations manual shall include relevant information to personnel and staff training

  - see also AMC1 ORA.ATO.230(b)

- manuals can be combined

-> cross-reference table between the regulations and the manuals

Additional requirements for ATOs providing specific types of training

Chapter 1 Distance learning course

Chapter 2 Zero flight-time training

Chapter 3 Multi-crew pilot licence courses

Chapter 4 Flight test training

- ATO may provide **distance learning** courses for
  - Modular courses
  - HPA courses
  - Pre-entry course for ME helicopter

- At least 10 % classroom instruction

Zero flight time training - ZFTT

- only for ATOs that have also CAT privileges or
- ATOs who have specific arrangement with CAT operator

- 90 days operational experience on type (some exemptions)
- FFS fully serviceable

ORA.ATO.350 MPL courses

- ATO having privileges to conduct CAT or specific arrangement

Thank you for your attention.

Any Questions?