

CERTIFICATION OF AN APPROVED TRAINING ORGANISATION

1.0 PURPOSE

1.1 This Advisory Circular (AC) describes the application and certification process for obtaining an Approved Training Organisation Certificate to conduct aviation training under the Civil Aviation (Approved Training Organisation) Regulations (ATO Regulations). This AC provides basic information applicable to the certification process.

1.2 Applicants will be briefed in as much detail as necessary regarding the preparation of the Training Procedures Manual and other documents during meetings with the Authority personnel. The information in this AC and the material referenced therein will assist the applicant in completing the process with minimal delays and complications.

1.3 Cancellation; This AC cancels CAA-AC-ATO001C, November 2017

2.0 REFERENCES

2.1 The Civil Aviation Act

2.1 The Civil Aviation (Approved Training Organisations) Regulations.

2.2 The Civil Aviation (Airworthiness) Regulations.

2.3 The Civil Aviation (Safety Management Systems) Regulations.

2.4 The Civil Aviation (Personnel Licensing) Regulations.

2.5 The Civil Aviation (Operation of Aircraft for Commercial Air Transport) Regulations.

3.0 BACKGROUND

3.1 The certification process is designed to ensure that a prospective holder of an Approved Training Organisation Certificate understands the requirements and is capable of meeting them. When satisfactorily completed, the certification process would ensure that the applicant is able to comply with the applicable requirements of ATO Regulations and the international standards applicable to the operation of an Approved Training Organisation (ATO).

3.2 The certification comprises of 5 phases. A phase separates the process into related sequential activities supporting a specific function. Each phase is described in sufficient detail to provide a general understanding of the entire certification process. The five (5) phases are:

- 3.2.1 Pre-application;
- 3.2.2 Formal Application;
- 3.2.3 Document Evaluation;
- 3.2.4 Demonstration and Inspection; and
- 3.2.5 Certification.

3.3 It is important to note that regardless of the type or complexity of the courses and training specifications applied for, the certification process will always follow the 5-phase processes. In some cases, the guidance and suggested sequence of events in this AC may not be entirely appropriate, for example rigid application of the processes in recertification of an existing ATO under the new Regulations. In such situations, the Authority and the applicant would proceed in a manner that considers existing conditions and circumstances. The applicant, however, should not expect to be certified until the Authority is assured that the Civil Aviation Act and pertinent Civil Aviation Regulations will be complied with in an appropriate and continuing manner.

4.0 PRE-APPLICATION PHASE

4.1 Prospective ATO Pre- Assessment Statement (PATOPS)

4.1.1 As far in advance as possible of the anticipated start of aviation training, a prospective ATO certificate applicant should contact the Authority office and inform the Authority of his intention to apply for an ATO certificate. The prospective certificate applicant will be invited to meet briefly with the Authority personnel. During this initial meeting, only basic information and general certification requirements will be discussed. If the prospective certificate holder intends to proceed with the certification application,

4.1.2 The Prospective ATO Pre-Assessment Statement (PATOPS) will be provided to him/her. A sample PATOPS Form is at Appendix A. The PATOPS should be completed, signed by the prospective ATO Certificate applicant, and returned to the Authority Offices. The form must be signed by the Accountable Manager.

4.1.3 The Authority personnel will review the PATOPS. If the information is incomplete or erroneous, the PATOPS will be returned to the prospective ATO certificate applicant with the reasons for its return. If the information is complete and acceptable, the Authority will determine the team who will be assigned to the certification project and schedule a pre-application meeting with the applicant and the selected Authority certification team members.

4.1.4 The Director responsible for Safety will designate one certification team member as the Certificate Project Manager (CPM).

4.1.5 The purpose of the pre-application meeting is to confirm the information on the PATOPS and to provide critical certification information to the applicant. It is recommended that the applicant's proposed key management staff attends the pre-application meeting and be prepared to discuss in general terms the plans and specific aspects of the proposed operation. Many problems can be avoided by discussing all aspects of the proposed operation and the specific requirements, which must be met to be certified as an ATO. Besides verifying the PATOPS information at the meeting, the Authority team would -

- a) Ensure that the applicant is aware of what is expected during the certification and all CARs that are applicable to the proposed training;
- b) Provide an overview of the certification process and the formal application;
- c) Answer any questions raised by the applicant;
- d) Evaluate the results of the meeting and take appropriate action;
- e) Provide the applicant with an ATO application information package.

The Authority considers it important to establish good working relationships and clear understanding between it, the aviation industry and persons who have an interest in aviation and aviation safety and security. The Authority recognises that a wide range of capabilities and expertise in aviation exists in Kenya. Therefore, background experience of an applicant will be considered by the Authority and adjusted to during these initial meetings.

4.1.6 To help promote a clear understanding throughout the certification process, the application information package includes the following:

- a) The applicable certification checklist which will be used by the Authority inspectors during the certification project;
- b) A schedule of events (SOE) template which must be completed by the applicant and submitted with the formal application;
- c) Other publications, documents and references the Authority thinks would be useful.

4.1.7 During the pre-application meeting, participating inspectors will assist the applicant in identifying all elements that accurately describe the applicant's intended operation. This information will be submitted as a part of his formal application package. The Authority certification team will guide the applicant on the application requirements. The applicant must be advised that correspondences made to the Authority in form of letters, forms, etc. must be signed by the Accountable Manager unless the Accountable Manager delegates the Authority in writing and submits it to the Authority.

4.1.8 If at any time during the certification phase the applicant formally terminates all efforts toward certification, or a period of 90 days has elapsed without any perceived activity by the applicant, or the Authority otherwise determines that the applicant will not proceed with the certification process, the PATOPS will be returned to the applicant. The Authority will notify the applicant in writing that this action terminates the pre-application process and that the applicant would have to submit a new PATOPS in order to re-initiate the certification process. Should the applicant again request to apply, a new pre-certification number will be assigned and the process shall begin from Phase I.

4.2 Application Requirements

4.2.1 ATO Regulations specifies that an applicant for an ATO certificate shall apply to the Authority in the prescribed form. It is important that the applicant familiarizes himself with the relevant Parts of ATO Regulations and this AC to determine the minimum documentation necessary to be considered acceptable for a formal application. The Authority team will also give him guidance at the pre-application meeting. The Civil Aviation (Approved Training Organisations) Regulations and other procedures developed by the Authority requires that certain documents accompany the application. The required documents are as follows but not limited to:

a) **Training and Procedures Manual**

The purpose of the Training and Procedures Manual (TPM) is to set forth the procedures and methods for the use and guidance of personnel concerned. Two copies of the Training and Procedures Manual (TPM) must accompany the application. The TPM may be considered as comprising two manuals for use by the ATO personnel – a Training Manual and a Procedures Manual. The TPM may be issued as a single document or in separate parts. The ATO must have a system in place to ensure that the TPM is amended as necessary to keep the information contained therein up to date. The system must ensure that copies of all amendments to the TPM are furnished promptly to all organisations or persons to whom the manual has been distributed. For ATO's providing more than one course shall develop a training manual for each course being sought.

The content of a training and procedures manual is outlined in the civil aviation (Approved Training Organization) Regulations as amended.

b) **List of Training Functions to be Performed by the ATO**

The required list of training functions would be included in the TPM. This item is identified here separately to emphasize the training specifications that accompany an ATO certificate. The list should also indicate details on the type of course, the equipment used for training and which courses would result in recommendation for the issue of an airman licence under Civil Aviation (Personnel Licensing) Regulations. Since this attachment will be used for the drafting of Training Specifications it should contain sufficient detail to allow the Authority to accurately describe the applicant's intended training courses, authorizations, limitations, provisions and privileges specific to the organisation. Training specifications will contain details of the following:

- i. The type of training authorized, including approved courses;
- ii. The ATO Name, Number and Expiry date
- iii. The category, class, and type of aircraft that may be used for training, testing, and checking where applicable;
- iv. For each flight simulator and flight training device subject to qualification evaluation by the Authority, the identification number assigned to that equipment after successfully completing the five phase approval process;

- v. The name and address(location) of each satellite ATO and the approved courses offered at each location;
- vi. Names and titles of the approved management personnel.

c) ATO certification checklist or Schedule of Events

The Schedule of Events is a key document that lists activities, programmes, required flight training equipment, description of the applicant's training facilities, equipment, qualifications of personnel to be used, proposed evaluation plans, tool acquisitions and other requirements that must be accomplished or made ready for the Authority's inspection before certification. An SOE template is provided as part of the application package. The applicant will enter the estimated date and timelines in consultation with his management team and the Authority. The estimated dates in the SOE must be logical in terms of sequence. Reasonable time for the Authority to review, inspect and approve each item or event should also be provided when approval is required before beginning a subsequent event or item. Failure to accomplish an item or event in a satisfactory manner or in accordance with the SOE could delay the certification. If at any time during the certification process the applicant finds it necessary to revise the SOE, the Authority should be notified as soon as possible. There will be a process of negotiation between the Authority and the applicant to agree certain items in the SOE with respect to certification timelines.

d) Statement of Compliance

This attachment is a document showing how the applicant intends to comply with the relevant Civil Aviation Regulations applicable to the proposed training operations. Pertinent regulations, sub regulations, and each relevant section of any schedules should be identified and accompanied by a brief description, or preferably a specific reference, in the applicant's manuals or other documents. The brief description or reference must describe the method of compliance for each regulation or schedule listed. If the precise method of compliance has not been developed at the time of formal application, an indication of the date that this information will be provided will be satisfactory at this point, if the date provided is reasonable and acceptable to the Authority. Appendix B is one example of how relevant sections of the Regulations may be presented in a Statement of Compliance.

e) Documents of Purchase, Leases, Contracts, or Letters of Intent Attachments

These attachments should provide evidence that the applicant is in the process of actively procuring facilities, equipment and tools, aircraft, and equipment manuals and services appropriate to training functions to be performed and the training specifications requested. If formal contracts are not completed, letters or other documents showing preliminary agreements or intent will suffice until such date as determined by the Authority when the final valid documents must be presented for the certification process to proceed. The facilities, equipment, tools and other support items must be of such type that support the training specifications requested. These documents may be attachments to the Training Procedures Manual (TPM).

For ATO's that are providing Flight Operations Officers training copies of Memorandum of Understanding with AOC's shall be provided.

f) Completed Biographical Data forms for Management Personnel and Instructors.

Appendix E is a sample biographical data form which would accompany the resumes of key management personnel and instructors. The forms contain information on the names, addresses, telephone numbers, name of employer, position held at the ATO and work experience held by the Applicant. The Biographical data forms must accompany with current Curriculum Vitae's, Current Licences and relevant documentation pertaining to the Position to be held.

5.0 FORMAL APPLICATION PHASE

5.1 The formal application must be submitted at least 90 days before training is planned to begin or as far in advance of the proposed start-up date as possible. The formal application for certification should be a letter with attachments containing the information comprising of a formal application package. The formal application letter must comprise of the following information:

- a) The full and official name of the applicant.
- b) the physical location address
- c) the applicant's intended primary operating location
- d) mailing address shall be included in the formal application letter if different from that shown on its letterhead
- e) the identity of key management personnel such as the Accountable Manager, Quality manager, Chief Ground Instructor, Chief Flight Instructor, Head of Training, Safety Manager as applicable

5.2 The attachments that need to accompany the formal application are:

- a) the schedule of events in the certification process with appropriate events addressed and target dates;
- b) an initial statement of compliance or detailed description of how the applicant intends to show compliance with each provision of applicable regulations;
- c) management biographical data forms with relevant CV's and certificates;
- d) Fully filled biographical data forms for all the instructors for the organization;
- e) a list of aircraft to be operated (attach all copies of those aircraft documents);
- f) Training manual for each course being taught
- g) Procedures manual
- h) Safety Management Systems Manual(If Applicable);
- i) Maintenance Control Manual;
- j) Aircraft Maintenance Program per aircraft type;
- k) Quality Manual;
- l) AFM/Pilot Operating Handbook (POH) per aircraft type;
- m) Any other Manuals specific to the training organization;
- n) documents of purchase, leases, contracts or letters of intent;
- o) maintenance agreements with copies of their AMO certificates and SOP's
- p) The status of the assessment of financial, economic and legal matters by the appropriate KCAA department (ASL).

5.3 Attachments to the Formal Application

5.3.1 *Schedule of events.* The schedule of events is a key document that lists items, activities, programmes, aircraft and facility acquisitions that will be made ready for inspection by the ATO before certification. The schedule should include:

- a) When the facilities will be ready for inspection;
- b) when each of the required manuals will be ready for evaluation;
- c) when aircraft will be ready for inspection;
- d) when the management personnel can be interviewed;
- e) If and when trainings can be observed.

5.3.2 *Initial statement of compliance.* The initial statement of compliance should be a complete list of all CAA regulations applicable to the proposed operation. Each regulation, or sub-part, should be accompanied by a brief description or a reference to a manual or other document. The description or reference should describe the method of compliance in each case. The method of compliance may not be finalized at the time of the formal application, in which case it shall be finalised before closure of Phase III. The purpose of the statement of compliance is to ensure that the applicant has addressed all regulatory requirements. It aids the CAA certification team to assess where the regulatory requirements have been addressed in the applicant's manuals, programmes and procedures.

5.3.3 *Management personnel and instructors.* The Civil Aviation regulations and procedures have establish basic management and instructor positions and the qualifications for these positions, with some variation in the requirement dependent upon the complexity of the proposed operation. The list should include the management positions, the names of the individuals involved and their qualifications and relevant management experience and, where appropriate, their licences, ratings and aviation experience.

5.3.4 *Safety Management Systems.* The details of the applicant's SMS including the safety policy, safety organization, safety assessments, occurrence reporting, hazard identification, risk assessment and risk management, event investigation and analysis, performance monitoring, safety promotion and safety assurance.

5.3.5 *Aircraft to be operated.* A list of the aircraft to be operated should be provided, with the make, model, series and the nationality and registration marks for each aircraft and details of the origin and source for each aircraft, if these details are known (copies Certificate of Registration). Other aircraft documents shall also be attached at this stage such as certificate of airworthiness, radio licence, and certificate of insurance, certificate of release to service.

5.3.6 *Documents of purchase, leases, contracts or Memorandum of understanding* Documents of purchase, leases, contracts or letters of intent should provide evidence that the applicant is actively procuring aircraft, facilities and services appropriate to the operation proposed. If formal contracts are not completed, letters or other documents showing preliminary agreements or intent should be provided. These documents should relate to aircraft, location facilities and services, weather reporting, maintenance, aeronautical charts and publications.

A memorandum of Understanding shall also be provided between the training organization and the AOC where the training organization intends to train Flight Operations Officers Course. The AOC to be utilized must be having operations that require dispatch services according to the training organizations training programme.

5.3.7 Training manual. The training manual, which may be provided in separate parts, should set out the applicant's training policies, the duties and responsibilities of personnel, training information for a particular course, instructors approved to train, course content, lesson plans, course handouts, examination procedures for that particular course, and the instructions and information necessary to train a particular course. The size, as well as the number of volumes, of the training manual will depend upon the size and complexity of the proposed training operations.

5.3.8 Procedures manual. The procedures manual, should set out the applicant's general procedures and policies, the duties and responsibilities of personnel, training policy and procedures, the capability lists, quality system for training, list of all instructors and all sample documents that the ATO intends to use in the organizations such as sample certificates, progress reports, etc.

5.3.9 Maintenance Control Manual (MCM). The MCM should describe the administrative arrangements between the applicant and the AMO and should define the procedures to use, the duties and responsibilities of operations and maintenance personnel and the instructions and information to permit maintenance and operational personnel involved to perform their duties with a high degree of safety.

5.3.10 Aircraft Maintenance programme. The maintenance programme, including a maintenance schedule, will detail the maintenance requirements for individual aircraft.

5.3.11 Quality Manual. Quality manual is a document that states the relevant information pertaining to an approved training organization's quality system and quality assurance programme;

5.3.12 Assessment of financial, economic and legal matters. The status of the assessment of financial, economic and legal matters should be clearly identified in the formal application package (ASL)

5.4 The Authority will review the application to determine that it contains the required information and attachments. If there are major omissions or errors, the formal application and all attachments will be returned with a letter outlining the reasons for its return. If the applicant has a good understanding of the requirements, the formal application should be of sufficient quality to allow any omission or open question to be resolved during the formal application meeting.

5.5 The formal application meeting would reinforce open communication and working relationships. The applicant's key management personnel would be expected to attend the formal application meeting. The purpose of this meeting is to discuss the formal application and resolve omissions, deficiencies and open questions. Date conflicts on the

SOE would also be resolved here. Subsequent phases of the certification process will be fully discussed. The applicant should seek clarification of any item or event that is not clearly understood. The Authority would respond to any questions the applicant may have and reinforce the certification process. Based upon the results of the meeting, the Authority certification team will determine the acceptability of the application package, but the PM will not formally accept the application during the meeting. This delay allows the prospective certificate holder time to resolve any omissions or any discrepancies discussed during the meeting.

5.6 The applicant will be notified by letter stating whether the formal application is accepted or denied. The Authority acceptance of a formal application does not constitute approval or acceptance of individual attachments. These documents will be evaluated thoroughly during subsequent phases of the certification process. If the formal application is not acceptable, it will be returned with all attachments and a written explanation of the reasons for its return.

6.0 DOCUMENT EVALUATION PHASE

6.1 After the formal application has been accepted, inspectors will begin a thorough evaluation of –

- a) The qualifications of management and instructors personnel;
- b) Training and procedures manual;
- c) MCM and AMP;
- d) Aircraft lease contracts where applicable;
- e) Final compliance statement.
- f) All the manuals and documents that have been submitted to the Authority in support of the application.

6.2 The Authority will endeavour to complete these evaluations in accordance with the timelines determined by the Authority. If a manual or document is incomplete or deficient, or if non-compliance with the regulations or safe operating practices is detected, the manual or document will be returned for corrective action. If the manual or document is satisfactory, it will be approved or accepted, as required by the regulations or procedures as prescribed by the Authority. Approvals will be indicated by letter. Acceptance of information that does not require formal approval will be indicated by letter or by lack of the Authority's objection to the information.

6.3 The initial Statement of Compliance which was submitted with the formal application should have progressed to a final Statement of Compliance by the end of the document evaluation phase. The fully completed final Statement of Compliance ensures that each applicable regulatory requirement has been adequately addressed in the appropriate manual, programmes and procedures.

6.4 The Applicant will be informed in writing of the closure of Phase III and requested to submit a Demonstration and Inspection Plan with dates 14 days before the start of the training.

7.0 DEMONSTRATION AND INSPECTION PHASE

7.1 An applicant will need to demonstrate his ability to comply fully with the regulations before beginning operations. These demonstrations include actual performance of activities and/or operations while being observed by Authority Inspectors. This includes on-site evaluations of at least the following:

- a) Aircraft proposed for conduct of training as applicable;
- b) Flight simulator and training devices as applicable;
- c) Training facilities and training equipment;
- d) Demonstrate procedures as per approved manuals;
- e) Training in progress;
- f) Testing and examinations;
- g) Record keeping system;
- h) Quality Control system.
- i) Safety Management Systems
- j) Management Personnel Interviews

7.2 During these demonstrations and inspections, the Authority evaluates the effectiveness of the policies, methods, procedures, and instructions as described in the applicant's manual and other documents. Emphasis is placed on the applicant's management of systems, quality control and overall management and training effectiveness during this phase. Discrepancies will be brought to the attention of the applicant and corrective action must be taken before a provisional ATO certificate and its associated training specification are issued.

8.0 CERTIFICATION PHASE

8.1 After the document evaluation and demonstration and inspection phases have been completed satisfactorily, the Authority will prepare the provisional ATO Certificate and approve the Training Specifications. The Training Specifications contain the courses, authorizations, limitations, and provisions specific to the certificate holder's operation.

9.0 REQUIREMENTS FOR AN UNRESTRICTED ATO CERTIFICATE

9.1 The Authority may issue an unrestricted ATO certificate with the appropriate training specifications within the 12 calendar months before the expiry date application is made, provided the applicant:

- Completes the PATOPS from as prescribed by KCAA;

- Has held a provisional ATO Certificate;
- all proposed courses have been observed by an Inspector within the preceding 12 months
- A Renewal inspection has been conducted and any deficiencies/findings raised have been satisfactorily closed.

10.0 VALIDITY OF AN APPROVED TRAINING ORGANIZATION

10.1 An ATO is valid for a period twelve months from the date of issue, or as stated on the ATO. The ATO shall cease to be valid if:

- a) the Authority amends, suspends, revokes or otherwise terminates the ATO
- b) the ATO holder surrenders the certificate to the Authority
- c) the Authority establishes that an approved training organisation has suspended provision of the approved courses for more than 90 continuous days; or
- d) The ATO holder notifies the Authority of the suspension of approved courses.

11.0 RENEWAL OF AN APPROVED TRAINING ORGANIZATION CERTIFICATE

11.1 Unless the ATO is suspended or revoked, the ATO will be renewed provided the ATO holder demonstrates continuous compliance with the applicable regulations and procedures described by the Authority. The Authority is responsible for conducting periodic inspections of the certificate holder's operation to ensure continued compliance with the Regulations and safe operating practices.

11.2 The application for the renewal of an ATO must be submitted to the Authority at least 60 days, or as otherwise agreed, before the end of the existing period of validity. This application for renewal of ATO should contain the following:

- a) A letter of request for renewal of the ATO
- b) Duly filled out PATOPS form
- c) Applicable attachments that are called by the PATOPS form
- d) Proof of payment of the ATO renewal fee

12.0 AMENDMENTS TO THE ATO CERTIFICATE AND TRAINING SPECIFICATIONS

12.1 An ATO certificate and Training specifications can be amended as a result of the ATO's request or because the Authority determines that safety and the public interest requires the amendment.

12.2 Amendment involving addition of courses, aircrafts and satellite bases will require the applicant to undergo a process following the 5 phase certification process described in this circular prior to approval/authorization. However some of the phases may be combined or eliminated depending on the specific application. This shall be further discussed in detail during the pre-application phase.

12.3 The application for the amendment must be submitted at least 90 days before the date of intended operation.

12.4 The ATO should submit a letter highlighting the proposed amendment to the ATO Training Specification with a duly filled out Prospective ATO Pre-Assessment Statement (PATOPS) form and all supporting information including applicable attachments that are called by the PATOPS Form such as copy of ASL and any other applicable documents.

12.5 The Authority may initiate an amendment to the training specifications if it determines the amendment is necessary for safety in aviation and in the interest of the public or when the ATO suspends provisions of the approved courses for more than 90 continuous days. The Authority shall notify the ATO certificate holder in writing, and the amendment shall become effective the date the ATO certificate holder receives notice of the amendment.

13.0 SURVEILLANCE

13.1 After certification of an ATO, the Authority is responsible for conducting periodic inspections of its operations to ensure continued compliance with the Regulations, the provisions of the ATO certificate and training specifications and safe operating practices. The Authority may also carry out spot checks of the operations of an ATO to determine whether it continues to comply with the Regulations.

14.0 SATELLITE ATO

14.1 If an ATO certificate holder proposes to conduct training at a facility other than his main base of operations, the Authority must be notified in writing at least 90 days prior to the proposed commencement of operations at the proposed satellite location. The facilities, equipment, personnel and course content of the ATO must meet the applicable requirements for the issue of training specifications to conduct specific training at that satellite location.

15.0 MANAGEMENT PERSONNEL OF A TRAINING ORGANIZATION

15.1 The Authority requires that an adequate number of qualified, competent staff are to be employed and that the management structure ensures supervision of all staff by persons having the necessary experience and qualities. All management personnel and training staff must be acceptable to and approved by the Authority. The Qualification of the management personnel are outlined in the Civil Aviation (Approved Training Organization) regulations as amended; However where the regulations calls out for relevant experience for a particular position this will be taken to mean that the applicant must have 3 years' experience in the training to be conducted.

15.2 The following positions shall be filled by persons who are qualified in accordance with relevant civil aviation regulations:

- a) Accountable Manager (AM)
- b) Head of Training (HOT)
- c) Quality Manager (QM)
- d) Chief Flying Instructor (CFI), and

e) Chief Instructor/ Chief Ground Instructor (CGI)

15.3 A person shall not hold two or more of the above named posts simultaneously unless specifically approved to do so. In general, at ATOs employing less than five instructors, the positions of;

- HOT and CFI or
- CFI and CGI or
- HOT and QM may be combined.

15.4 Where posts are combined, the post holder shall meet the qualification requirements for each of the posts held. At least one of the nominated post holders shall be employed full time.

15.5 In addition for ATO's engaged in flight crew training must have a safety manager and a maintenance Liaison officer accepted by the Authority. The accepted qualifications and responsibilities of the positions are:

15.5.1 Safety Manager

The Safety Manager shall have the primary role to verify, by monitoring activities in the field of safety, that the standards required by the Authority, and any additional requirements as established by an approved training organization are being carried out properly; be responsible for ensuring that the Safety Assurance programme is properly implemented, maintained and continuously reviewed and improved;

The Safety Manager should also be technically qualified in one of the field of training to be conducted, have at least 3 years' experience in the field of aviation operations and must have successfully completed a training in safety management systems.

15.5.2 Maintenance Liaison Officer

Maintenance Liaison Officer is responsible to the accountable manager for the overall maintenance activities and works related to the training aircraft used by the flight training organization. He is responsible for the co-ordination of the selection of aircraft and aircraft equipment, spare parts and technical standards related to new aircraft. He is also responsible for communicating with the contracted maintenance organizations to ensure all maintenance is carried out in accordance with the approved maintenance schedule or programme on behalf of the training organization. He shall ensure compliance of a Quality System in coordination with quality Manager that promotes the highest standards of airworthiness and effectiveness of the overall maintenance program.

The minimum qualification for the Maintenance Liaison Officer shall be as follows—

- a) Degree or Diploma in aeronautical engineering or its equivalent acceptable to the Authority
- b) A licensed maintenance engineer
- c) At least five years' experience in maintaining the aircraft, TWO years of which as a certifying staff for the most complex or largest aircraft applied for in the ATO;
- d) Have appropriate type training on aircraft operated by the ATO; and
- e) Have attended a management or supervisory course

16.0 RECORD KEEPING

16.1 The record-keeping system of an ATO should meet the requirements have specified in the Civil Aviation (Approved Training Organization) Regulations as amended. The records kept by the ATO should be sufficient to provide documentary evidence of each training action and allow the reconstruction of the training history of each student or instructor in the ATO. It is important to maintain the integrity of records, ensuring that they are not removed or altered. A backup of the records is also necessary to ensure continuity in case of a major disaster and Records of both instructional personnel and trainees should be readily accessible when required. The ATO must also develop procedures in their procedures manual regarding:

- a) attendance records;
- b) student training records;
- c) staff training and qualification records;
- d) persons responsible for checking records and student personal logs;
- e) nature and frequency of record checks;
- f) standardization of record entries;
- g) personal log entries; and
- h) Security of records and documents.

16.2 The form and content of student training records is to be specified in the Procedures Manual and must be acceptable to the Authority appropriate to the courses conducted.

16.3 The ATO must maintain the following records:

- a) A cumulative record of theoretical knowledge lessons attended by subject; attendance sheets, lesson plans and all progress reports.
- b) 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 where students should be invited to sign each report acknowledging its contents;
- c) Cumulative flying training achieved; and if applicable synthetic flight training achieved;
- d) For each training flight detail, the date, the aircraft registration, the flight time, the instructor's name in full, the hours flown previously; the hours flown for the day; the hours to be carried forward, 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 must indicate the standard achieved and any deviations from the syllabus including incomplete items. Students should sign each report acknowledging the debrief; for navigation exercises a copy of the Navigation Log form and flight plan should be attached to the daily flight progress report; and for any solo flights the form should be filled as above and comments should be filled by the student on his own assessment on the flight.

- e) For each synthetic flight training detail, the date, 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 must indicate the standard achieved and any deviations from the syllabus including incomplete items. Students sign each report acknowledging the debrief;
- f) Records of 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;
- g) 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 on the course shall be summarised on completion or termination of the course.

16.4 The student records must contain the following:

- a) The personal details of each student, including name, address, telephone contact number(s), next of kin details,
- b) Previous experience and evidence of all pre-entry requirements and qualifications including a summary of any credit to which the student may be entitled and an assessment of his suitability to undertake the course,
- c) Copies of passport/id's,
- d) Copy of medical certificate(if applicable);
- e) Copy of relevant licence (if applicable); and
- f) A copy of the student report from previous ATO when the student does a transfer from another approved ATO

16.5 Flight authorization is required for all flights made during the course. ATO shall ensure that at least following information is recorded in the appropriate records:

- a) the date of the flight;
- b) type of aircraft;
- c) the aircraft registration mark;
- d) the names of the instructor and student;
- e) the detail of exercise;
- f) the route to be flown and the aerodrome(s) to be visited(evidence to proof the navigation exercise took place);
- g) the authorizing instructor's initials or signature;
- h) the initials/name or signature of the student/Instructor both before and after flight;
- i) out time, in time and total flight time;
- j) number of landings;
- k) remarks;
- l) Printed Serial number on each page(sequence from 1-1000)

16.6 If computer based records are used they must be backed up daily; however the format of records shall be maintained as mentioned above The arrangements for safeguarding such

records against loss, corruption and unauthorized change are to be noted in the Records section of the Procedures Manual. A backup server in another location should be maintained.

16.7 Transfer of Student Records

16.7.1 Training Courses should be completed as a continuous course of training at a single ATO. However, where there are sound reasons for a student to transfer from one approved training provider to another during a course, credit will be given for training completed as per the approved procedures. Transfer of student from one ATO to another needs the ATO accepting the student, to obtain a record from the previous training organization along with other relevant documents the ATO may require to satisfactorily establish the level the student is at and where to begin training such a student.

16.7.2 The HQT of the new ATO must therefore make an assessment of the further training required to ensure that the full approved course is completed to a satisfactory standard in accordance with their approved training and procedures manual.

16.7.3 Whenever a student completes training, terminates training, or transfers to another ATO, the student's record shall be certified to that effect by the Chief instructor/ Chief Flying Instructor and a detail report shall be provided on all the training completed by the student.

16.8 Students' pilot logbooks must be kept in accordance with the provisions of the civil aviation(operation of aircraft for commercial air transport) regulations as amended. All 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 Authority approved course exercise designator as outlined in Appendix D.

16.9 Students' logbooks are to be certified as being correct at the end of each course by the Head of Training or the Chief Flight Instructor. The logbooks of instructors who conduct flight instruction on an approved course must be maintained and include a monthly summary of all flight time which clearly distinguishes approved course instructional flying from other flying. All flight time conducted at an ATO by an approved instructor must be certified as true and correct on a monthly/annual basis by the Head of Training or Chief Flight Instructor.

16.10 All training records, regardless of type, are to be retained for a minimum of 10 years from the date of course completion.

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

- A full set of KCAA regulations
- Aeronautical Information Publication (AIP) ;
- Aeronautical Information Circulars
- Flight Manuals for the aircraft used on the course(s) on offer
- ATC Flight Plan and explanatory material/guide
- Standard meteorology reports and forecasts (in document or computer based formats)
- Flight planning documents
- NOTAM's

- All training and Procedures manual

16.12 For documents maintained in an electronic format the distribution procedures and policies of such documents should be well explained in the procedures manual.

17.0 TRAINING & TESTING AIRCRAFT

17.1 All training aircraft will meet the requirements set forth in the civil aviation regulations as well as any additional requirements outlined by the aircraft manufacturer as required. An adequate fleet of training aircraft appropriate to the courses shall be provided. The fleet shall include, as appropriate to the courses of training, aeroplane(s)/ helicopter(s) suitably equipped to simulate instrument meteorological conditions and suitably equipped for the instrument flight and testing where required.

18.0 AERODROMES AND SITES

18.1 The base aerodrome, and any satellite base, at which flying training is being conducted shall meet the requirements as specified in the Civil Aviation (Approved Training Organization) regulations as amended. In the case of helicopters, sites shall be available for:

- Confined area operation training
- Simulated engine off autorotation
- Sloping ground operation

18.2 Approved training courses may not commence and end at Satellite aerodromes without the approval of the Authority. This may involve additional inspections and certification costs. Where it is necessary to use Satellite aerodromes regularly for operational reasons, full details should be included in the training and procedures manual.

19.0 FLIGHT OPERATIONS AND CLASSROOM ACCOMMODATION

19.1 The operational accommodation for training courses conducted shall be of a scale appropriate to the population of instructors and of pilots under training. All accommodation must be sited within permanent structures, not shared with the general public. All rooms are to be suitably equipped and furnished with provision for heating, light and ventilation and are not to be combined with any accommodation used continuously for the purpose of administering the ATO, or for non-approved courses of training.

19.2 The facilities of the ATO should have the following but not limited to:

- Offices for the Accountable Manager, Head of Training, CFI and CGI separate from the accommodation provided for instructional staff and students.
- enclosed briefing rooms/cubicles and lecture rooms of adequate size relative to the maximum student capacity, with appropriate training aids as described in their procedures manuals.
- Model aeroplanes or model helicopters, as appropriate, shall also be available for use in briefing rooms/cubicles.
- A quiet room for self-study purposes is to be available for students. Where a dedicated room is not available, specific times must be allocated to other rooms where self-study can occur at specific times and this must be acceptable to the Authority.
- A separate room(s) shall be provided where synthetic training devices are used.

- Well-equipped Library;
- Lavatory and washroom facilities are to be provided as well as facilities for rest and refreshment.
- Facilities for theoretical knowledge instruction shall ideally be co-located with the flying and synthetic flight training facilities.
- Suitable demonstration equipment be available to support the theoretical knowledge instruction. This should include, where appropriate, sectioned components and instruments, appropriate wall diagrams, transparencies, slides, models, systems demonstration equipment, mock ups, etc.

19.3 All classrooms are to be suitably equipped and furnished with provision for heating, light and ventilation and must be protected from external noise and distractions and sufficiently spacious to allow individual students room within which to work without disturbing others. The room should be suitably equipped with white/ black boards, PA system (if applicable) and screens for projection systems etc. Each trainee should be provided with an individual desk and chair.

20.0 ATO'S TRAINING AND PROCEDURES MANUAL

20.1 The structure of the manual should be easy to understand, appropriate for the information and clearly identified through headings and other formatting devices. An explanation of the organizational elements such as the headings, numbering scheme, main parts of the document and other sources of coding or groupings should be provided at the beginning of the manual.

20.2 Precise language should be used wherever possible. Terms for common items and actions should be consistent throughout the manual and must be clear and easily understood.

20.3 The writing style, terminology, formatting and use of graphics and symbols should be consistent throughout the document, including the location of specific types of information and use of units of measurement and codes.

20.4 The ATO should also develop an information review, distribution and revision control system to process information resulting from changes that originate within the ATO. This includes changes to:

- the ATO's policies, processes, procedures and practices;
- respond to operating experience;
- the scope of training provided;
- the content of training programmes;
- results stemming from the installation of new equipment;
- an approval document or certificate requested by the ATO and issued by KCAA;
- Maintain standardization of training delivery and performance criteria.

20.5 The content of the training and procedures manual are spelled out in the second schedule of the Civil aviation (Approved training Organization) Regulations as amended, provides a detailed list which expands on the structure expected for the manual and acceptable to the Authority.

21.0 QUALITY SYSTEM OF AN ATO

21.1 This guidance material provides information and guidance to an ATO applicant on how to establish a Quality System that satisfies the quality control standards required to ensure that training and instructional practices comply with all relevant requirements.

21.2 The acceptable quality system are spelled out in the first schedule of the civil aviation (approved training organization) regulations as amended

22.0 SAFETY MANAGEMENT SYSTEMS

22.1 The Authority requires an ATO, that are exposed to safety risks related to aircraft operations during the provision of their services implement a safety management system (SMS) acceptable to the Authority.

22.2 The Civil Aviation (Safety Management Systems) Regulations as amended also outline the framework for the implementation and maintenance of an SMS and provides for the SMS to be commensurate with the size of the ATO and the complexity of its operations. The framework for the implementation and maintenance of an SMS must be established and made acceptable by the Authority.

23.0 EXPLANATION OF APPENDICES IN THE AC

23.1 The following Appendices accompany this document:

Appendix A is a sample PATOPS form;

Appendix B is an example of a compliance statement;

Appendix C is a list of definitions of some key terms used in ATO certification

Appendix D is a is an approved flight exercise course designator

Appendix E is a sample Biographical Data Form



Civil Aviation Authority

**APPENDIX A
PATOPS FORM**

**PROSPECTIVE ATO PRE-ASSESSMENT STATEMENT (PATOPS)
(To be completed by an applicant for an ATO Certificate)**

Please mark as applicable:

APPLICATION FOR THE ISSUE OF AN ATO CERTIFICATE/SPECIFICATIONS

APPLICATION FOR THE AMENDMENT OF AN ATO CERTIFICATE/SPECIFICATIONS

APPLICATION FOR THE RENEWAL OF AN ATO CERTIFICATE/SPECIFICATIONS

SECTION 1: ATO INFORMATION

1. Name of ATO	2. Postal address of the ATO:
3. Address of the principal (main) base where operations will be conducted.	4. Address of Satellite Location for the conduct of specific training.
5. Approved training requested at each Satellite Location:	6. Proposed Start-up Date:
7. Email address:	8. Telephone Numbers:

SECTION 2: MANAGEMENT PERSONNEL

Name		Proposed position in the ATO	Telephone & address (if different from company include country code)
Surname	First Name		

SECTION 3: PROPOSED COURSES OF INSTRUCTION

Applicant intends to conduct: (Tick as required)

Pilot Training – PPL Ground Flight

Pilot Training – CPL Ground Flight

Pilot Training – ATPL Ground Flight

Aircraft Maintenance Engineers Training

Flight Operations Officers Training

Air Traffic Controllers Training

SECTION 4: AIRCRAFT INFORMATION

Registration	Make/Model	Owned/Leased	Registration	Make/Model	Owned/Leased

SECTION 5: SIMULATOR INFORMATION		
1. Authority Assigned identification number:		
2. Make, model and series of aircraft being simulated		
3. Letter of Approval Expiry:		
SECTION 6: ADDITIONAL INFORMATION		
1. Proposed AMO to be used (Provide copies of AMO agreements, AMO Certificates and AMO SOP's)		
2. For Amendments of ATO certificate and/or training specification, provide additional information leading to the amendment request:		
3. For Renewal of ATO certificate and training specification attach the following: <input type="checkbox"/> Proof of Payment <input type="checkbox"/> Current List of Aircraft being Operated <input type="checkbox"/> Current List Of Instructors(Flight Crew Training/ATC/FOO/AMEL)		
4. The statement and information contained on this form denotes an intention to apply for a Authority Certificate for the operation of an ATO		
Name and Title (Block Letters)	Signature	Date (dd/mm/yyyy).
SECTION 7: TO BE COMPLETED BY THE INSPECTOR		
Received By:	Date (dd/mm/yyyy)	
Remarks:		
SECTION 8: TO BE COMPLETED BY MPEL		
Received By:	Date (dd/mm/yyyy)	
Remarks:		
SECTION 9: TO BE COMPLETED BY DASSR (FOR INITIAL APPLICATION ONLY)		
Received By:	Date (dd/mm/yyyy)	
Remarks:		

APPENDIX B

EXAMPLE OF A COMPLIANCE STATEMENT

STATEMENT OF COMPLIANCE				
Regulation.	TITLE	APPLY	TPM REF.	REMARKS
1	Citation	N	N/A	N/A
:2	Interpretation	Y	TPM, Ch 1, Pg 2 Section 1.1.2	
3	requirement for an ATO certificate	Y	TPM Ch 2, Pg 1 Section 1.1.5	
3	Evaluation and checking			
17(1)(a)	Nomination of an Accountable Manager	Y	TPM Ch 2, Pg 1 Section 2.5	
17(1)	Staffing Requirements	Y	TM Ch 2, Pg 2 Section 1.11	
22(2)	Maintain facilities, equipment and material	Y	PM Ch 2, Pg 3 Section 3.0	
22(3)	Changes to facilities equipment or material	Y	TPM Ch 2, Pg 3 Section 5.0 Quality Manual Chp 5 Pg 5 Sec 4.0	
				It is acknowledged that the DGCA may prescribe the conditions under which the ATO may operate while it is changing location

APPENDIX C

DEFINITIONS

Accountable Manager. The individual who has corporate authority for ensuring that all training commitments can be financed and carried out to the standard required by the civil aviation authority, and any additional requirements defined by the approved training organization (ATO).

Approved maintenance organization. An organization approved by a Contracting State, in accordance with the requirements of Annex 8, Part II, and Chapter 6 – Maintenance Organization Approval, to perform maintenance of aircraft, engine, propeller or parts thereof and operating under supervision approved by that State.

Approved training. Training conducted under special curricula and supervision approved by a Contracting State.

Approved training organization (ATO). An organization approved by and operating under the supervision of a Contracting State in accordance with the requirements of Annex 1 to perform approved training.

Checking. See definition of testing.

Competency. A dimension of human performance that is used to reliably predict successful performance on the job. A competency is manifested and observed through behaviours that mobilize the relevant knowledge, skills and attitudes to carry out activities or tasks under specified conditions.

Compliance. The state of meeting those requirements mandated through regulation.

Conditions. Anything that may qualify a specific environment in which performance will be demonstrated.

Evaluator. A generic term used in the context of an approved training organization (ATO) to describe a person who is qualified, authorized and assigned to carry out specific assessment, checking, testing and/or auditing duties to determine that all required standards of performance have been satisfactorily achieved.

Finding. A finding is a conclusion by the operator's or by the civil aviation authorities audit personnel that demonstrates either non-compliance with a regulation or non-conformity with a specific standard.

Flight Simulation Training Device means any one of the following three types of apparatus in which flight conditions are simulated on the ground—

a flight simulator, which provides an accurate representation of the cockpit of a particular aircraft type to the extent that the mechanical, electrical, electronic, etc. aircraft systems control functions, the normal environment of flight crew members and the performance and flight characteristics of that type of aircraft are realistically simulated;

a basic instrument flight trainer, which is equipped with appropriate instruments, and which simulates the cockpit environment of an aircraft in flight in instrument flight conditions

a flight procedures trainer, which provides a realistic cockpit environment, and which simulates instrument responses, simple control functions of mechanical, electrical, electronic, etc. aircraft systems, and the performance and flight characteristics of aircraft of a particular class controls in an open flight deck area or an enclosed aircraft cockpit. It includes the hardware and software necessary to represent a category and class of aircraft (or set of aircraft) operations in ground and flight conditions having the appropriate range of capabilities and systems installed in the device as described within this AC for the specific basic or advanced qualification level.

Foreign ATO. An approved training organization (ATO) located outside the territory of the State.

Head of training. The individual responsible for the organization's activities, policies, practices and procedures while ensuring the continued maintenance of the training organization's approval status.

Licensing Authority. The Authority designated by a Contracting State as responsible for the licensing of personnel.

Maintenance Liaison Officer. The manager responsible for the day-to-day provision of aircraft maintenance activities and the continuing airworthiness of all aircraft released for flight operations.

Policy. A document containing the organization's position or stance regarding a specific issue.

Process. A set of interrelated or interactive activities which transform inputs into outputs.

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 (QA). All the planned and systematic actions necessary to provide adequate confidence that all training activities satisfy given standards and requirements, including the ones specified by the approved training organization in relevant manuals.

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.

Quality inspection. That part of quality management involving quality control. In other words, inspections accomplished to review a document or observe events/actions, etc., in order to verify whether established operational procedures and requirements are being fulfilled during the accomplishment of the event or action, and whether the required standard is being achieved.

Quality management. A management approach focused on the means to achieve product or service quality objectives through the use of its four key components: quality planning; quality control; quality assurance; and quality improvement.

Quality manager. The manager responsible for the quality monitoring function and for requesting remedial action.

Quality manual. The document containing the relevant information pertaining to the approved training organization's quality system.

Quality of training. The outcome of the training that meets stated or implied needs within the framework of defined standards.

Quality system (QS). The aggregate of all the organization's activities, plans, policies, processes, procedures, resources, incentives and infrastructure working in unison towards a total quality management approach. It requires an organizational construct complete with documented policies, processes, procedures and resources that underpins a commitment by all employees to achieve excellence in product and service delivery through the implementation of best practices in quality management.

Qualification and Approval Guide (QAG). The QAG is a detailed description of the simulated aircraft systems, design criteria, and functionality for a flight procedures trainer.

Safety management system (SMS). A systematic approach to managing safety, including the necessary organizational structures, accountabilities, responsibilities, policies and procedures.

Safety manager. The manager responsible for providing guidance and direction for the planning, implementation and operation of the organization's safety management system.

Testing. The comparison of the knowledge about a task or the skill to perform a task against an established set of criteria to determine that the knowledge or skill observed meets or exceeds, or does not meet, those criteria.

APPENDIX D

APPROVED FLIGHT EXERCISE COURSE DESIGNATOR

For Purposes of ATO's within Kenya, all practical training exercises shall be numbered as follows:

- Exercise 1 - Aircraft Familiarization
- Exercise 2 – Preparation for Pre Flight and Post Flight
- Exercise 3 – Air Experience
- Exercise 4 – Effects of Control
- Exercise 5 - Taxiing
- Exercise 6 – Straight and Level
- Exercise 7 – Climbing
- Exercise 8 - Descending
- Exercise 9 – Medium Level Turns
- Exercise 10 - Stalling
- Exercise 11 – Spinning
- Exercise 12 – Take Off
- Exercise 13 – Landing
- Exercise 14 – First Solo
- Exercise 15 - Advanced Turning
- Exercise 16 – Operation at Minimum Level
- Exercise 17 – Forced Landing
- Exercise 18 - Navigation
- Exercise 19 – Instrument Flying
- Exercise 20 – Night Flying

APPENDIX E
SAMPLE BIOGRAPHICAL DATA FORM

MANAGEMENT PERSONNEL BIOGRAPHICAL DATA (To be completed by the Nominee)			
1. Company name:	2. Company address:		
3. Name of nominee:	4. Position:		
5. Address of Nominee:			
6. Status: <input type="checkbox"/> Permanent <input type="checkbox"/> Contracted - Full Time <input type="checkbox"/> Contracted - Part Time			
7. Qualifications relevant to item (4) position (Tick here <input type="checkbox"/> if information is continued on page 3 of this form)	Date From	Date to	
(1)		Present	
(2)			
8. Work experience relevant to item (4) position:	Date From	Date to	
(1)		Present	
(2)			
(3)			
Attach copies of certificates/proof of experience to this form in support of information supplied.			
9. I,..... hereby confirm that (Print Name in full)			
(a) I have not			
i. held a certificate or aviation document issued by a civil aviation authority that was revoked or terminated within the previous five years by reason of criminal, fraudulent, improper action or insanity on my part; nor			
ii. contributed materially to the revocation or suspension of an aviation document issued by a civil aviation authority			
(b) The information provided on this form is true and correct to the best of my knowledge.			
Signature:..... Date:.....			
10. For Authority Official Use Only			
Received by:			
Name: Position:			
Signature:..... Date:.....			