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**GCAA
ADVISORY CIRCULAR**

**PERSONNEL LICENCING
AC NO: GCAA AC/PEL-003 ISS 3**

**SUBJECT: APPROVED TRAINING ORGANISATION
(ATO) QUALITY SYSTEM**

DATE REVISED: 07-31-2026
REVISED BY: Director, Safety
and Security

I. GENERAL

This Advisory Circular No. GCAA AC/PEL-003 ISS 3, cancels and replaces all previous versions issued before July 31, 2026.

- A. This Advisory Circular (AC) provides information and guidance** for applicants or holders of an Approved Training Organisation (ATO) certificate to develop a quality system to comply with the provision of the Civil Aviation (Personnel Licensing) Regulations 2024, The Civil Aviation (Approved Training Organisation) Requirements 2024 and amendments thereto, that will be acceptable to the Guyana Civil Aviation Authority (GCAA).

Referenced Regulation/Requirements:

- References: Civil Aviation (Personnel Licensing) Regulations 2024
- Civil Aviation (Personnel Licensing) Requirements 2024 and amendments thereto.
- Civil Aviation (Approved Training Organisations) Requirements 2024 and amendments thereto.

- B. The quality manual is a formal record of the ATO certificate holder's quality system** - It also serves as the single point of reference used by the certificate holder to manage all aspects of its operation to ensure consistent quality levels. Training organisations use the policy, guidance and procedures documented in the quality manual for:

- a) Inspecting
- b) Auditing
- c) Reviewing and evaluating the effectiveness of their quality system.

- C. Terminology Used** - The following key terms and phrases are defined to ensure a standard interpretation and understanding of the elements of a Quality System. These terms and definitions when used in the context of this AC have the following meanings:

1. **Accountable Manager.** The manager who has corporate authority for ensuring that all training commitments can be financed and carried out to the standard required by the GCAA, and any additional requirements defined by the ATO. The Accountable manager is normally the Head of Training and may delegate in writing to another person within the organisation the day-to-day management but not the overall management responsibility.
2. **Concern.** A concern is a conclusion by the operator's audit personnel, supported by objective evidence that does not demonstrate a finding, but rather a condition that may become a finding.

3. **Finding.** A finding is a conclusion by the operator's audit personnel that demonstrates non-conformance with a specific standard.
4. **May.** Means that the application or a procedure or provision is optional.
5. **Quality Assurance.** Those planned and systematic actions necessary to provide adequate confidence that all training activities *will* satisfy given standards and requirements, including the ones specified by the ATO in relevant manuals.
6. **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.
7. **Quality Control.** The operational techniques and activities that are used to fulfil requirements for quality. Quality Controls are the key procedures, responsibilities, and decision-making positions within an organisation, department, division, or functional area. As part of a quality evaluation, the controls should be verified and tested. In some instances, personnel performing the quality evaluations may have to first determine the features of a control.

Example: The manner in which a certificate holder that owns, operates, or maintains aircraft, engines, or appliances determines Airworthiness Directive (AD) applicability is considered a control of the AD conformance system. The design of this control is critical when developing an effective AD conformance system.

Continuing with the above example, personnel responsible for conducting quality inspections and audits may have to determine first how the certificate holder verifies AD applicability before proceeding with an evaluation of AD accomplishment and records. In particular, the evaluation would focus on procedures that would minimize the risk of a simple human error or oversight.

8. **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* fulfilled during the accomplishment of the event or action, and whether the required standard is achieved. Student stage checks and skill tests are Quality Inspections, and they are also Quality Control functions.
9. **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.
10. **Quality Management System.** The documented internal activities and management functions of a training organisation's Quality System that determine quality policy, objectives and responsibilities and their implementation through quality planning, quality control, quality assurance and quality improvement. The certificate holder's Quality

Management System structure is based on the size, type of operation and complexity of the organization.

11. **Quality Manager (QM).** The manager or designate person responsible for the monitoring function and for requesting remedial actions. *The Quality Manager is responsible directly to the Accountable Manager.*
12. **Quality Manual.** The document containing relevant information pertaining to the company quality system and quality assurance programme.
13. **Quality Policy.** The overall quality intentions and direction of the company as regards quality, as formally expressed by the accountable manager.
14. **Quality System.** 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.
15. **Relevant Documentation.** Documents are causative, and generally consist of permanent documentation describing or defining systems, processes, procedures, etc. Documents include relevant parts of the training organisation's Training and Procedures Manual, which may be included in a separate Quality Manual.
16. **Shall.** Means that the application of a rule or procedure or provision is mandatory ("Must" is used as an alternative to "Shall").
17. **Should.** Means that the application of a procedure or provision is recommended.

D. Quality Policy.

1. It is of vital importance that the ATO describes how the organization formulates, deploys, reviews its policy and strategy and turns it into plans and actions that conform with its training and procedures manual. A formal written Quality Policy Statement should be established that is a commitment by the Head of Training, as to what the Quality System is intended to achieve. The Quality Policy should reflect the achievement and continued compliance with relevant parts of Civil Aviation (Personnel Licensing) Regulations 2024, Requirements for Personnel Licensing 2024 and the Requirements for Approved Training Organisation 2024 with any additional standards specified by the ATO.

The formal written quality statement established by the ATO should be:

- a) Easy to understand, ambitious, and achievable.
 - b) A commitment by the head of training.
 - c) A statement of what the quality system is intended to achieve.
 - d) A statement that reflects achievement and continued compliance with Requirements for PEL and ATO and any additional standards specified by the ATO.
2. The Accountable Manager is an essential part of the ATO management organisation. The term 'Accountable Manager' is intended to mean the Chief Executive / President / Managing Director / Head of Training / General Manager etc. of the operator's organisation, who by

virtue of his or her position has overall responsibility (including financial) for managing the organisation.

3. The Accountable Manager will have overall responsibility for the ATO Quality System including the frequency, format and structure of the internal management evaluation activities as prescribed in paragraph III, H, 6 below.

E. Purpose of a Training Organisation's Quality System.

1. The Quality System, documented in the ATO's Quality Manual, should enable the training organisation to monitor conformance with relevant sections of the Regulations and Requirements for PEL and ATO, the Training and Procedures Manual and any other standards specified by the ATO, or the GCAA, to ensure safe and efficient training.
2. The fundamental purpose of the Quality Manual is to document the training organisation's methods for:
 - a) monitoring training services and process controls.
 - b) monitoring assessment and testing methods.
 - c) monitoring personnel qualifications and training.
 - d) monitoring training devices and equipment qualification, calibration and functionality, as applicable.
 - e) conduct of internal and external audits.
 - f) development, implementation and monitoring of corrective and preventive actions and associated reporting systems.
 - g) utilizing appropriate statistical analysis to identify and respond appropriately to trends.

F. Quality Manager.

1. The primary role of the Quality Manager is to verify, by monitoring activities in the field of training that the standards required by the GCAA, and any additional requirements defined by the operator, are being carried out under the supervision of the Head of Training, Chief Flight (or skill) Instructor and Chief Ground (or classroom) Instructor.
2. The Quality Manager should be responsible for ensuring that the quality system is properly documented, implemented, maintained and continuously reviewed and improved.
3. The Quality Manager should:
 - a) Have direct access/report directly to the Head of Training.
 - b) Have access to all parts of the ATO's and, as necessary, any sub- contractor's organisation.
4. In the case of small/very small ATOs the positions of Head of Training and the Quality Manager may be combined. However, in this event, independent personnel should conduct quality audits.

II. QUALITY SYSTEM.

A. Introduction. The quality system of the ATO should ensure compliance with requirements, conformance to standards and adequate training activities conducted.

1. The training organisation should specify the basic structure of the Quality System, as it is applicable to all training activities conducted.

2. The Quality System should be structured according to the size of the training organisation and the complexity of the training to be monitored.
3. A well written Quality Manual should have the following common construction features:
 - a) Instructions and information for performing duties safely
 - b) Not be contrary to applicable Requirements or the ATO's training specifications
 - c) Easy to revise and to determine revision status
 - d) Date of the last revision on each page
 - e) References appropriate Requirements.
4. Typically, information documented in a training organisation's Quality Manual controls the quality system, its description and procedural references and other information needed by the certificate holder affecting the quality and conformance of its operation. Training organisations must take into account conformance with relevant Requirements during construction of their Quality Manual. Where appropriate, it is suggested that training organisations incorporate the following safety attributes into their policies, procedures and processes:
 - a) Authority (Is there a clearly identifiable, qualified and knowledgeable person with the authority to establish or modify a process?)
 - b) Responsibility (Is there a clearly identifiable, qualified and knowledgeable person who is accountable for the quality of a process?)
 - c) Procedures (Are methods for accomplishing processes documented?)
 - d) Controls (Are there checks and restraints designed into the operator's processes that assure the desired result?)
 - e) Process Measurements (Are methods identified that compel the ATO to measure and assess its processes for the purpose of identifying and correcting problems or potential problems?)
 - f) Interfaces (Do the ATO's policies and procedures identify how it manages interactions between processes?)

B. Scope.

1. As a minimum, the Quality System should address the following:
 - a) Leadership
 - b) Policy and Strategy
 - c) Processes
 - d) The provisions of the Requirements for PEL and ATO
 - e) Additional standards and training procedures as stated by the ATO
 - f) The organizational structure of the ATO
 - g) Responsibility for the development, establishment and management of the Quality System
 - h) Documentation, including manuals, reports and records
 - i) Quality Assurance Program
 - j) The required financial, material and human resources
 - k) Training requirements
 - l) Customer satisfaction
2. Feedback System. The quality system should include a feedback system to the Accountable Manager (Head of Training) 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-conformance in each particular case, and the procedure to be followed if corrective action is not completed within specified time limits.

3. Documentation. Relevant documentation includes the relevant parts of the Training and Procedures Manual, which may be included in a separate Quality Manual.

In addition, relevant documentation should also include the following:

- a) Quality Policy (Mission Statement)
 - b) Terminology
 - c) Specified training standards
 - d) A description of the organisation
 - e) The allocation of duties and responsibilities
 - f) Training procedures to ensure regulatory conformance
 - g) The Accident Prevention and Flight Safety Programme
 - h) The Quality Assurance Programme, reflecting.
 - i. Schedule of the monitoring process
 - ii. Audit procedures
 - iii. Reporting procedures
 - iv. Follow-up and corrective action procedures
 - v. Recording system
 - vi. The training syllabus; and
 - vii. Document control.
4. Records. Each document defined within the structure of the training organisation's Quality System should be subject to document control procedures that will ensure the documents are:
 - a) Authorized
 - b) Adequate
 - c) Security classified
 - d) In a standardised form when completed
 - e) Revised and amended when required
 - f) Appropriately distributed
 - g) Stored
 - h) Periodically reviewed
 - i) Appropriately disposed

III. QUALITY ASSURANCE PROGRAMME.

- A. **Introduction.** The Quality Assurance Programme should include all planned and systematic actions necessary to provide confidence that all training is conducted in accordance with applicable requirements, standards and procedures. Quality Inspections, Audits and Management Evaluations are the principal components of a Quality Assurance Programme.
- B. **Quality Inspections.** 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. Check-pilots, designated pilot examiners, designated maintenance inspectors and supervisors are examples of personnel that conduct quality inspections in the performance of their duties. Typical subject areas for quality inspections are:
 1. Actual training sessions
 2. Maintenance (if applicable)

3. Technical Standards; and
 4. Training Standards.
- C. Audits.** An audit differs from a quality inspection in that it is a systematic, and *independent* comparison of the way in which *training* is being conducted against the way in which the published training procedures say it should be conducted.
1. Audits should include at least the following quality procedures and processes:
 - a) A statement explaining the scope of the audit
 - b) Planning and preparation
 - c) Gathering and recording evidence; and
 - d) Analysis of the evidence.
 2. Audit Techniques. Techniques, which contribute to an effective audit, are:
 - a) A review of published documents
 - b) Interviews or discussions with personnel
 - c) The examination of an adequate sample of records
 - d) The witnessing of the activities which make up the training; and
 - e) The preservation of documents and the recording of observations.
- D. Auditors.** An ATO should decide, *depending on the size and complexity of the training*, whether to make use of a dedicated audit team or a single auditor. In any event, the auditor or audit team should have relevant training and/or operational experience.

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

- E. Auditor's Independence.** Unlike quality inspectors, auditors *should not* have any day-to-day involvement in the *area of the operation or maintenance activity* that is to be audited. A training organisation may, in addition to using the services of full-time dedicated personnel belonging to a separate quality department, undertake the monitoring of specific areas or activities by the use of part-time auditors.

An 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 organisation or from an external source under the terms of an agreement acceptable to the GCAA.

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 is familiar with the type of training conducted by the training organisation.

The ATO's Quality Assurance Programme should identify the persons within the organisation who have the experience, responsibility and authority to:

1. Perform quality inspections, and to perform audits, as part of ongoing Quality Assurance
2. Identify and record any concerns or findings, and the evidence necessary to substantiate such concerns or findings
3. Initiate or recommend solutions to concerns or findings through designated reporting channels
4. Verify the implementation of solutions within specific time limits
5. Report directly to the Quality Manager

F. Audit Scope. ATOs are required to monitor conformance with the Training and Procedures Manuals they have designed to ensure safe and efficient training. In doing so they should as a minimum, and where appropriate, monitor:

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

G. Audit Scheduling.

1. A Quality Assurance Programme should include a defined audit schedule and a periodic review cycle. The schedule should be flexible, and allow unscheduled audits when trends are identified. Follow-up audits should be scheduled when necessary to verify that corrective action was carried out and that it was effective.
2. An ATO should establish a schedule of audits to be completed during a specified calendar period. All aspects of the training should be reviewed within every period of 12 months in accordance with the programme unless the GCAA office supervising the operator's certificate accepts an extension to the audit period.

An ATO may increase the frequency of audits at its discretion but should not decrease the frequency without the agreement of the GCAA. It is considered unlikely that an interval between audits greater than 24 months would be acceptable for any audit topic.

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

H. Monitoring and Corrective Action.

1. The aim of monitoring within the Quality System is primarily to investigate and judge its effectiveness and thereby to ensure that defined policy and training standards are continuously complied with. Monitoring and corrective action functions fall under the responsibility of the Quality Manager. Monitoring activity is based upon quality inspections, audits, corrective action and follow-up. The ATO should establish and publish procedures in its Quality Manual to monitor regulatory conformance on a continuing basis. This monitoring activity should be aimed at eliminating the causes of unsatisfactory performance.
2. Any non-conformance 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 Accountable Manager. Such non-conformance should be recorded, for the purpose of

further investigation, in order to determine the cause and to enable the recommendation of appropriate corrective action.

3. The Quality Assurance Programme should include procedures to ensure that corrective and preventive actions are developed in response to findings. These quality procedures should monitor such actions to verify their effectiveness and that they have been completed. Organisational responsibility and accountability for the implementation of corrective action resides with the department cited in the report identifying the finding. The Accountable Manager will have the ultimate responsibility for ensuring, through the Quality Manager, that the corrective action has re-established conformance with the standard required by the GCAA, and any additional requirements defined by the training organisation.
 4. Corrective action. Following the quality inspection/audit, the ATO should establish:
 - a) The seriousness of any findings and any need for immediate corrective action.
 - b) The origin of the finding.
 - c) What corrective actions are required to ensure that the non-conformance does not recur.
 - d) A schedule for corrective action.
 - e) The identification of individuals or departments responsible for implementing corrective action.
 - f) Allocation of resources by the Accountable Manager, where appropriate.
 5. The Quality Manager should:
 - a) Verify that in reply to any finding of non-conformance the responsible manager takes corrective action,
 - b) Verify that corrective action includes the elements outlined in paragraph H.4 a) through f) above.
 - c) Monitor the implementation and completion of corrective action.
 - d) Provide management with an independent assessment report of corrective action, implementation and completion.
 - e) Evaluate the effectiveness of corrective action through the follow-up process.
 6. Management Evaluation. A management evaluation is a comprehensive, systematic, documented review by the management of the quality system of operational policies and procedures, and should consider the results of quality inspections, audits and any other indicators, including the overall effectiveness of the management organisation in achieving stated objectives.
 - a) A management evaluation should identify and correct trends, and prevent, where possible, future non-conformities. Conclusions and recommendations made as a result of an evaluation should be submitted in writing to the responsible manager for action.
 - b) The responsible manager should be an individual who has the authority to resolve issues and take action.
 - c) The Accountable Manager should decide upon the frequency, format, and structure of internal management evaluation activities.
 - d) The management review shall include assessing opportunities for improvement to the quality system, including policy and objectives
- I. Recording.** The training organisation should maintain accurate, complete, and readily accessible records documenting the results of the Quality Assurance Programme. Records are essential data

that enable an ATO to analyse and determine the root causes of non-conformity, so that areas of non-conformance can be identified and addressed.

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

- a) Audit Schedules.
- b) Quality inspections and Audit reports.
- c) Responses to findings.
- d) Corrective action reports.
- e) Follow-up and closure reports; and
- f) Management Evaluation reports.

IV. QUALITY ASSURANCE RESPONSIBILITIES FOR SATELLITE ATOs.

A. Satellite ATOs.

1. An ATO may decide to sub-contract out certain activities to external organisations subject to the approval of the GCAA. (See the Requirements for ATO 3.1.2.12)
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 and quality to be provided. The satellite ATO's safety related activities relevant to the agreement should be included in the ATO's Quality Assurance Programme.
3. The ATO should ensure that the satellite ATO has the necessary authorisation/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 authorisation/approval, the ATO is responsible for ensuring that the satellite ATO's quality assurance takes account of such additional requirements.

V. QUALITY SYSTEM TRAINING.

A. General. An ATO should establish effective, well-planned and resourced quality related briefing for all personnel.

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 down in the Quality Manual.

1. Those responsible for managing the Quality System should receive training covering:
 - a. An introduction to the concept of the Quality System.
 - b. Quality management.
 - c. The concept of Quality Assurance.
 - d. Quality manuals.
 - e. Audit techniques.
 - f. Reporting and recording; and
 - g. The way in which the Quality System will function in the ATO.
2. Time should be provided to train every individual involved in quality management and for briefing the remainder of the employees. The allocation of time and resources should be governed by the size and complexity of the operation concerned.

VI. Sources of Training. Quality management 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 Quality Systems. Operators with sufficient appropriately qualified staff should consider whether to carry out in-house training.

VII. QUALITY SYSTEMS FOR SMALL/VERY SMALL TRAINING ORGANISATIONS.

A. Introduction.

1. The requirement to establish and document a Quality System, and to employ a Quality Manager applies to all ATOs.
2. Complex quality systems could be inappropriate for small or very small operators and the clerical effort required to draw up manuals and quality procedures for a complex system may stretch their resources. It is therefore accepted that such ATOs should tailor their quality systems to suit the size and complexity of their operation and allocate resources accordingly.
3. For small and very small ATOs it may be appropriate to develop a Quality Assurance Programme that employs a checklist. The checklist should have a supporting schedule that requires completion of all checklist items within a specified timescale, together with a statement acknowledging completion of a periodic review by top management. An occasional independent overview of the checklist content and achievement of the Quality Assurance should be undertaken (See Attachment A).
4. The small ATO may decide to use internal or external auditors or a combination of the two. In these circumstances it would be acceptable for external specialists and or qualified organisations to perform the quality audits on behalf of the Quality Manager.
 1. If the independent quality audit function is being conducted by external auditors, the audit schedule should be shown in the relevant documentation.
 2. Whatever arrangements are made, the main ATO retains the ultimate responsibility for the quality system and especially the completion and follow-up of corrective actions.

APPROVED BY:


Lt. Col. (Ret'd) Egbert Field, A.A.
Director General
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ATTACHMENT A

Explanatory Outline Of The Type Of Quality Manual
That Might Be Used By An
Approved Training Organisation That
Employs 6 - 20 Instructors

(NAME) SCHOOL OF AVIATION QUALITY MANUAL

(NAME) SCHOOL OF AVIATION

Foreword

This quality system ensures that _____ School of Aviation is maintaining the standards existing at the GCAA's approval inspection and that training is being given to the highest standard. The Guyana Civil Aviation Authority has approved _____ School of Aviation to conduct training for the following courses

- Private Pilot Licence Course
- Commercial Pilot Licence Course
- Instrument Rating Course
- Flight Instructor Rating Course.
- Aircraft maintenance Technician Licence Course

The quality system that follows is tailored to suit the size and complexity of the training conducted at _____ School of Aviation.

(NAME)

SCHOOL OF AVIATION

A. Introduction. The Introductory paragraph contains a brief background description of the Manual and its applicability, for example:

“This manual satisfies the Requirements for ATO 3.1.2.3 (c) and describes the _____ School Of Aviation Quality System.”

B. Definitions

These definitions of QA terminology are taken from the Requirements for ATO 2024: 3.1.1.2 and IS 3.1.2.3 (b)

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

Quality Assurance. All those planned and systematic actions necessary to provide adequate confidence that all training activities satisfy given requirements, including those specified by _____ School Of Aviation’s own 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 Manual. The document containing the relevant information pertaining to _____ School Of Aviation’s quality system and quality assurance programme

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

Accountable Manager. The manager who has corporate authority for ensuring that all training commitments can be financed and carried out to the standard required by the GCAA and any additional requirements defined by the ATO. The accountable manager may delegate in writing to another person within the organization the day-to-day management but not the overall management responsibility.

C. Responsibilities

These include only those personnel directly involved in the Quality System and describe only their responsibilities with respect to the System. For example:

1. **Accountable Manager.** The Accountable Manager will normally be the Head of Training. In this case the Accountable Manager will probably be the Managing Director or equivalent. While it is quite acceptable for the quality control of the ATO to be included in a pre-existing system, the Head of Training remains responsible to the Authority for quality aspects of the ATO’s activities. The Accountable Manager is responsible for:

- a. Documenting and maintaining the Quality Policy

- b. Ensuring that the Quality System is established, implemented and maintained
 - c. Reviewing, at regular intervals, the suitability and effectiveness of the Quality System
 - d. Co-ordinating improvements to the Quality System
2. **Quality Manager.** The Quality Manager's responsibilities are largely administrative. While there are advantages to the QM being directly involved in the training process this is not essential. The QM should be independent of the normal management structure and, even in the smallest organisation, should, whenever possible, be an individual other than the Head of Training. In the event that the functions of Head of Training and Quality Manager cannot easily be separated, independent auditors must conduct audits. The Quality Manager is responsible to the Accountable Manager for:
- a. Verifying that all standards and rules are complied with
 - b. Programming, supervising and recording the conduct of Quality Audits
 - c. Ensuring that follow-up action within an agreed time frame is taken in respect of any non-conformance
 - d. Maintaining records of completed audits, non-conformances, and ...
 - e. Corrective and preventative action
3. **Quality Auditors.** While the Quality Manager may conduct the Quality Audits, it is better practice to employ independent auditors, perhaps from some other part of the Company. However, it is more important that the auditor(s) have some professional knowledge of the area to be audited. If the functions of Head of Training and Quality Manager are combined, the use of independent auditors is mandatory. The Quality Auditors are responsible to the Quality Manager for:
- a. Carrying out Quality Audits as detailed in this manual
 - b. Reporting any non-conformance, and
 - c. Agreeing with the manager responsible on a time period within which remedial action is to be taken

D. Quality Policy. This is a formal written statement that represents a commitment by the Head of Training (Accountable Manager) as to what the Quality System is intended to achieve. The Quality Policy should reflect the achievement and continued conformance with relevant sections of the Requirements for Personnel Licensing and Approved Training Organizations 2024 together with any additional standards specified by the ATO. For example:

" _____ School Of Aviation's Quality System is committed to ensure the provision of the highest standards of training in a safe environment, to meet or exceed customer requirements and to ensure continued compliance with:

- Requirements for Personnel Licensing and Approved Training Organizations 2024, and...
- Our Procedures and Training Manuals

Signed: (Name), Head of Training"

E. Purpose of the Quality System. This is an overview of the Quality System's aims, for example:

The Quality System provides a formal method of:

- Identifying the training policy and maintaining training and flight safety standards
- Assigning responsibilities within the Quality System
- Monitoring compliance with relevant sections of the Requirements for Personnel Licensing and Approved Training Organizations 2024, the Procedures and Training Manual and other standards established by the ATO or the GCAA to ensure they are complied with
- Identifying the documentation of corrective action to be taken to ensure that all deviations are dealt with

F. Description of the Quality System. This is a description of how the Quality System is intended to achieve its stated aims. The System should audit those parts of the organization subject to inspection by the GCAA and ensure conformance with the Requirements for Personnel Licensing and Approved Training Organizations 2024. There should be a method of correcting/preventing non-conformances and allowing for feedback to the Head of Training. Since quality is closely connected to customer satisfaction, some procedure for feedback should be included. Both staff and trainees should be encouraged to become involved in the Quality System and a procedure to allow for suggestions and observations should be included. For example:

The Quality System comprises Quality Audits, customer feedback and provision for suggestions and reports from both staff and customers. The Quality Manager who is responsible to the Head of Training but independent of the normal management structure controls the system. The Quality Manager has free access to all parts of the ATO and direct access to the (MD/CEO) when required.

Quality Audits are programmed by the Quality Manager and conducted by auditors who are not normally involved in the day-to-day business of the ATO. Non-conformances are recorded on the audit completion form and a time limit for corrective action is agreed with the responsible manager. The Quality Manager maintains a record of any non-conformance and ensures that a follow-up audit is completed at the end of the agreed period to ensure that corrective action has been successful.

On completion of a training course, customers are requested to complete a Customer Feedback Form referred to in Annex G to this manual. The completed form is passed to the Quality Manager who, in consultation with the Head of Training who will decide whether any corrective or preventative action is required. When warranted, issues documented on a Customer Feedback Form may be communicated from the Quality Manager to the relevant manager through use of a Non-Conformance Report Form. The Quality Manager maintains a record of customer feedback.

All staff and relevant stakeholders should have access to Non-Conformance Reports that are completed and passed to the Quality Manager. Corrective action is decided upon in conjunction with the Head of Training and the originator of the report is kept informed of progress. The Quality Manager keeps a record of all Non-Conformance Reports and corrective or preventative actions

G. Description of Quality Audits. It is not recommended to time the internal audit as a precursor to the GCAA's approval inspection. Such timing would leave the organization unchecked for almost twelve months. A better plan would be to carry out an audit of the three areas, suggested in the attached example audit checklists, at three monthly intervals commencing three months after the annual approval inspection. Such a schedule will help to ensure that standards are maintained throughout the year and not just at the time of the GCAA inspector's visit. Annex A contains a sample audit schedule. For example:

A full quality audit will be carried out annually to ensure conformance with all aspects of The Requirements for PEL and ATO. A schedule will be established by the Quality Manager to ensure that each area is subject to audit at least every 12 months. The auditors will have free access to all training records, training manuals, order books, training notes, operations and aircraft documentation, and training equipment and facilities. In addition, they will monitor any activity - training or otherwise, that they deem appropriate. This may include briefings, debriefings, flights, air traffic control, slight training exercises and classroom lessons, as well as interviews with any manager or staff member.

H. Procedure for Quality Audits. A description of precisely how the audits and follow-up actions will be completed.

1. The audit will examine, but is not necessarily confined to, the items included in the appropriate Audit Checklist (Annexes B-D). Before commencing an audit, the auditor will refer to the previous audit report for the area and note any reported non-conformance. Particular attention will be paid to items that have been subject to previous non-conformance.
2. On completion of the audit the auditors will debrief the responsible manager on the results of the audit and agree to a date by which any remedial actions will have been taken. The auditor(s) and the responsible manager will then sign the audit completion form or letter. Three copies of the audit report will be prepared and distributed to:
 - a. The auditor(s)
 - b. The Quality Manager
 - c. The Responsible Manager
3. Once any agreed corrective action has been completed, the responsible manager will submit a Corrective Action Report (Annex F). The Quality Manager will confirm that all required

corrective action has been completed within the agreed time period. Failure to complete corrective action by the agreed date will be reported to the Accountable Manager.

4. All non-conformance items will be re-audited after a suitable period to assess the effectiveness of the corrective action.
5. Audit Forms, Non-conformance reports and Corrective Action reports will be held by the Quality Manager for inspection by the Authority. All Quality System correspondence will be retained for at least 5 years.

I. Review of Audits and Procedures. No system is perfect and allowance must be made for changes to the Quality System and Audit Procedures to ensure their continued relevance, for example:

The Quality Manager, in consultation with the Head of Training will carry out an annual review of the Quality System to determine its performance, to identify any repetitive non-conformances and to specify any necessary action to be taken. After each audit review the Quality Manager may revise the audit schedule for the following 12-month period to reflect any required changes in emphasis.

J. Quality Control of Sub-contractors. This may not appear to apply to all ATOs. However, there will be those organisations that will arrange for some training to be conducted by specialist ground or synthetic training providers. In this case it is the responsibility of the Head of Training of the ATO to ensure the quality of such training. To allow for unforeseen circumstances it is suggested that all ATOs include a statement on quality control of sub-contractors. For example:

If any part of the approved training is sub-contracted, i.e. to a specialist synthetic or ground training organisation, the Quality Manager will carry out an audit of the sub-contractor to ensure it's conformance with the appropriate parts of The Requirements for PEL and ATO. The Quality Manager will manage records of such audits in the same manner as for internal audits.

K. Training of Quality Personnel. Quality management and auditing are tasks with which many are unfamiliar; therefore, the Quality Manager and auditor(s) shall be adequately trained for their tasks. For example:

It is the policy of International Air School Of Aviation to ensure that all personnel are trained and experienced to the extent necessary to undertake their assigned tasks. It is the responsibility of managers to ensure that staff allocated specific tasks are suitably qualified and experienced. The Quality Manager and auditors will have received appropriate training in quality procedures. The Quality Manager will retain records of all such training.

Annexes

- A. Example of Audit Schedule
- B. Example of Audit Checklist (Management & Administration)

- C. Example of Audit Checklist (Flight Training)
- D. Example of Audit Checklist (Ground & Synthetic Training)
- E. Example of Audit Checklist (AME Training)
- F. Example of Corrective Action Report
- G. Example of Customer Feedback Form

ANNEX A

Example of an Audit Schedule

Month	Routine Audit	Follow-up Audit
January		
February		
March	GCAA Approval Inspection	
April		
May		
June	Management & Administration	
July		
August		
September	Flight Training/ AME /ATC /Flight Dispatcher Training	
October		
November		
December	Ground & Synthetic Training AME/ATC Simulator	

Note: The Quality Manager, as a result of non-conformances found during routine audits, may program follow-up audits

ANNEX B**Example of Quality Audit Checklist – Management & Administration**

No.	Subject	S/U	Remarks
1.	Does the management structure accord with the ATO Operations Manual Requirements for ATO 3.2.2, IS: 3.2.2		
2.	Are the Head of Training and his/her nominated deputy properly qualified Requirements for ATO 3.3.3 (a) (iii)		
3.	Do staffing levels comply with requirements Requirements for ATO 3.2.2 (a)		
4.	Are the flight Instructors properly qualified and current Requirements for ATO 3.2.2 (b)(c), 3.3.3 (a) (4)		
5.	Are the instructors for Synthetic Flight Training properly qualified IS: 3.2.2 Appendix E		
6.	Are the required training records properly maintained and kept for the proper time Requirements for ATO 3.2.3 (a)		
7.	Are training records kept in the format described in the Training Manual . Requirements for ATO 3.2.3 (b)		
8.	Is personal information relating to ATO personnel (expiry dates of medicals, ratings etc.) kept up to date Requirements for ATO 3.2.3 (a) (3)		
9.	Is the Training Manual up to date, pertinent and in the correct format Requirements for ATO 3.2.9 (c), 3.3.8 (c)		
10.	Is the training programme in the correct format. Requirements for ATO 3.3.5 (d)		
11.	Is the Procedures Manual up to date and pertinent to the ATO operation Requirements for ATO 3.2.9 (c)		

ANNEX C

Example of Quality Audit Checklist – Flight Training

No.	Subject	S/U	Remarks
1.	Do trainees have free access to flight planning information (AIP, AICs, NOTAMS, Weather, etc.) Requirements for ATO 3.2.8 (a) (1)		
2.	Are all operations, training and planning documents up-to-date and pertinent to the courses provided Requirements for ATO 3.2.9 (c)		
3.	Are the aircraft used for training equipped and maintained to a suitable standard Requirements for ATO 3.2.5 (a) (2)		
4.	Are the aircraft used for flight training the same variant as taught in the ground school Requirements for ATO 3.2.5 (a)		
5.	Does the ATO have continuous use of each aerodrome from which flights originate. Requirements for ATO 3.2.7		
6.	Do the aerodromes used for flight training have adequate runways and necessary equipment Requirements for ATO 3.2.7		
7.	Was the published training programme followed both as to total hours and order of exercises; e.g. Requirements for ATO IS 3.2.9 (a) (5)		
8.	Were training records correctly and fully completed Requirements for ATO 3.2.3 (b)		
9.	Is there an effective method of assessing and maintaining instructional standards; e.g. Requirements for ATO 3.1.2.3 (c)		

ANNEX D

Quality Audit Checklist – Ground & Synthetic Training

No.	Subject	S/U	Remarks
1.	Is the classroom accommodation sufficient for the number of trainees and satisfactory with respect to comfort, ventilation, noise, etc. Requirements for ATO 3.2.8 (a) (2) (i)		
2.	Is the training equipment adequate and pertinent to the training being given (OHP, White/ Blackboard, Videos, Cockpit photographs, etc. Requirements for ATO 3.2.8 (a)		
3.	Are course materials up to date and pertinent to the training (Checklists, Flight Manuals, Course notes, etc.) Requirements for ATO 3.2.9 (c)		
4.	Was training conducted in accordance with the approved training programme Requirements for ATO 3.1.2.2 (b)		
5.	Was the ground and synthetic training presented in accordance with the approved training programme Requirements for ATO 3.1.2.2 (c)		
6.	Are the approved test papers still pertinent to the aircraft and variants used for training Requirements for ATO 3.2.9 (c)		
7.	Are synthetic training devices approved for use Requirements for ATO 3.2.6 (b)		
8.	Are maintenance and other records, including reliability data, kept where relevant Requirements for Operation 3.2.5 (a) (2)		

ANNEX E

Example of Quality Audit Checklist – AME/ATC/ Flight Dispatcher Training

Note: ATO may adapt the checklist in order to conduct a more comprehensive quality audit based on the approved training specifications.

No.	Subject	S/U	Remarks
1.	Is the classroom accommodation sufficient for the number of trainees and satisfactory with respect to comfort, ventilation, noise, etc.? Requirements for ATO 3.3.6 (a) (1)		
2.	Is the training equipment adequate and pertinent to the training being given workspace, part, tools, etc.? Requirements for ATO 3.3.6 (a) (3)		
3.	Are suitable areas provided for application of finishing materials, including paint spraying? Requirements for ATO 3.3.6 (a)(4)		
4.	Are suitable areas provided, with a wash-tank and degreasing equipment, with pressurized air or other adequate cleaning equipment? Requirements for ATO 3.3.6 (a) (5)		
5.	Is there a suitable facility for running engines? Requirements for ATO 3.3.6 (a) (6)		
6.	Are areas suitable to clean, test, inspect ignitions, fuel systems, and hydraulics? Requirements for ATO 3.3.6 (a) (7)		
7.	Is suitable space and equipment provided for disassembling, inspecting, and jacking aircraft? Requirements for ATO 3.3.6 (a) (8)		
8.	Is suitable space and equipment available for disassembling, inspecting, assembling, troubleshooting and timing of engines? Requirements for ATO 3.3.6 (a) (9)		
9.	Is the instructional equipment appropriate for the various airframe structures, systems, and components to complete practical projects required by the approved training program? Requirements for ATO 3.3.6 (b) (1)		

Example of Quality Audit Checklist

AME/ATC/Flight Dispatcher Training (Page 2)

No.	Subject	S/U	Remarks
10.	Does the ATO possess at least one aircraft of a type acceptable to the GCAA? Requirements for ATO 3.3.6 (b) (2)		
11.	Are suitable airframes, engines, propellers, components, avionics equipment sufficiently diversified to show different types of construction, and inspection, and operation when installed in an aircraft? Requirements for ATO 3.3.6 (c)		
12.	Are the ATO facilities, equipment, and materials appropriate for the Licence and/or rating being sought? Requirements for ATO 3.3.6 (d)		
13.	Does the AME ATO have and maintain an adequate supply of material, special tools, and shop equipment used in constructing, and maintaining aircraft appropriate to it's approved program, to ensure each student will be properly trained? Requirements for ATO 3.3.6 (e)		
14.	Has the ATO made any substantial changes to the facilities, equipment, or material without approval of the GCAA? Requirements for ATO 3.3.6 (f)		
15.	Does the ATO have and maintain a Training and Procedures Manual? Requirements for ATO 3.3.8 (a)		
16.	Is the Training and Procedures Manual combined? Requirements for ATO 3.3.8		
17.	Are the Training and Procedure/s Manuals up to date? Requirements for ATO 3.3.8 (b)		
18.	Are all copies of the Training and Procedures Manual/s amendments furnished promptly to all organisations or persons furnished a manual/s? Requirements for ATO 3.3.8 (c)		

Example of Corrective Action Report

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ANNEX G

Example of Customer Feedback Form

(The design of this form will be specific to each training organisation)

To: Quality Manager, Course Title: _____,

Date: _____

Please rate the course completed on the following factors.

1. Length of course:

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

2. Depth of Information:

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

3. Pace of Instruction

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

4. Clarity of Instruction Objectives

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

5. Sequence of Content

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

6. Opportunity to Practice

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

7. Suitability of Course Materials

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

Example of Customer Feedback Form (Page 2)

8. Effectiveness of Instructors

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

9. Equipment

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

10. Facilities

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

11. Overall Quality

- ☐ Highly Satisfactory ☐ Satisfactory ☐ Somewhat Satisfactory ☐ Slightly Satisfactory ☐ Not Satisfactory

12. If any area needs improvement, what specific change(s) would you suggest?

13. Please mark the response that best describes how well this training met your needs.

- ☐ Excellent ☐ Good ☐ Average ☐ Fair ☐ Poor

14. If you selected "Fair" or "Poor" above, please explain below.
