

5. In a quality system of any Training Organization the following five elements should be clearly identifiable:

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

6. The Quality System required in other LCAA regulations also applicable to a particular Training Organization may be integrated according to 3. above.

THE QUALITY SYSTEM OF THE TRAINING ORGANIZATION

1. Terminology

Accountable Manager

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

Quality

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

Quality Assurance

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

Quality Manager

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

Quality Manual

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

Quality Audit

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

2. Quality Policy and Strategy

It is of vital importance that the Training Organization describes how the organisation formulates, deploys, reviews its policy and strategy and turns it into plans and actions.

A formal written Quality Policy Statement should be established that is a commitment by the Head of Training as Training Organization what the Quality System is intended to achieve.

The Quality Policy should reflect the achievement and continued compliance with relevant parts of LARs together with any additional standards specified by the Training Organization.

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

3. Purpose of a Quality System

The implementation and employment of a Quality System will enable the Training Organization to monitor compliance with relevant parts of LARs, the Operations Manual, the Training Manual, and any other standards as established by that Training Organization, or the LCAA, to ensure safe and efficient training.

4. Quality Manager

The primary role of the Quality Manager is to verify, by monitoring activities in the field of training, that the standards required by the LCAA, and any additional requirements as established by the Training

Organization, are being carried out properly under the supervision of the Head of Training, the Chief Flying Instructor and the Chief Ground Instructor.

The Quality Manager should be responsible for ensuring that the Quality Assurance Programme is properly implemented, maintained and continuously reviewed and improved.

The Quality Manager should:

- have direct access to the Head of Training;
- have access to all parts of the Training Organization's organisation.

In the case of small or very small Training Organizations, the posts of the Head of Training and the Quality Manager may be combined. However, in this event, quality audits should be conducted by independent personnel.

In the case of a training organisation offering integrated training the Quality Manager should not hold the position of Head of Training, Chief Flying Instructor and Chief Ground Instructor.

5 Quality System

The Quality System of the Training Organization should ensure compliance with and adequacy of training activities requirements, standards and procedures.

The Training Organization should specify the basic structure of the Quality System applicable to all training activities conducted.

The Quality System should be structured according to the size of the Training Organization and the complexity of the Training Organization to be monitored.

6 Scope

A Quality System should address the following:

- a) Leadership
- b) Policy and Strategy
- c) Processes
- d) The provisions of LARs
- e) Additional standards and training procedures as stated by the Training Organization
- f) The organisational structure of the Training Organization
- g) Responsibility for the development, establishment and management of the Quality System
- h) Documentation, including manuals, reports and records
- i) Quality Assurance Programme
- j) The required financial, material, and human resources
- k) Training requirements
- l) Customer satisfaction

7 Feedback System

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

8 Documentation

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

- a) In addition relevant documentation should also include the following:
 - Quality Policy;
 - Terminology;
 - Specified training standards;
 - A description of the organisation;
 - The allocation of duties and responsibilities;
 - Training procedures to ensure regulatory compliance.
- b) The Quality Assurance Programme, reflecting:
 - Schedule of the monitoring process;
 - Audit procedures;
 - Reporting procedures;

- Follow-up and corrective action procedures;
- Recording system;
- The training syllabus; and
- Document control.

9 Quality Assurance Programme

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

10 Quality Inspection

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

Typical subject areas for quality inspections are:

- a) Actual flight and ground training;
- b) Maintenance;
- c) Technical Standards; and
- d) Training Standards.

11 Audit

An audit 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.

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

- a) An explanation of the scope of the audit;
- b) Planning and preparation;
- c) Gathering and recording evidence; and
- d) Analysis of the evidence.

The various techniques that make up an effective audit are:

- a) Interviews or discussions with personnel;
- b) A review of published documents;
- 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.

12 Auditors

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

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

13 Auditor's Independence

Auditors should not have any day-to-day involvement in the area of the operation or maintenance activity which is to be audited.

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

In all cases the Training Organization 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 Organization.

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

- a) Perform quality inspections and audits as part of ongoing Quality Assurance;
- b) Identify and record any concerns or findings, and the evidence necessary to substantiate such concerns or findings;

- c) Initiate or recommend solutions to concerns or findings through designated reporting channels;
- d) Verify the implementation of solutions within specific timescales;
- e) Report directly to the Quality Manager.

14 Audit Scope

Training Organizations are required to monitor compliance with the Training and Operations Manuals they have designed to ensure safe and efficient training.

In doing so they should as a minimum, and where appropriate, monitor:

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

15 Audit Scheduling

A Quality Assurance Programme should include a defined audit schedule and a periodic review cycle. The schedule should be flexible, and allow unscheduled audits when trends are identified.

Follow-up audits should be scheduled when necessary to verify that corrective action was carried out and that it was effective.

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

A Training Organization may increase the frequency of their audits at their discretion but should not decrease the frequency without the acceptance of the LCAA. It is considered unlikely that a period of greater than 24 months would be acceptable for any audit topic.

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

16 Monitoring and Corrective Action

The aim of monitoring within the Quality System is primarily to investigate and judge its effectiveness and thereby to ensure that defined policy, training standards are continuously complied with. Monitoring activity is based upon quality inspections, audits, corrective action and follow-up.

The Training Organization should establish and publish a quality procedure to monitor regulatory compliance on a continuing basis. This monitoring activity should be aimed at eliminating the causes of unsatisfactory performance.

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

The Quality Assurance Programme should include procedures to ensure that corrective actions are developed in response to findings. These quality procedures should monitor such actions to verify their effectiveness and that they have been completed.

Organisational responsibility and accountability for the implementation of corrective action resides with the department cited in the report identifying the finding. The Accountable Manager will have the ultimate responsibility for ensuring, through the Quality Manager(s), that corrective action has re-established compliance with the standard required by the LCAA and any additional requirements established by the Training Organization.

17 Corrective action

Subsequent to the quality inspection/audit, the Training Organization should establish:

- a) The seriousness of any findings and any need for immediate corrective action;

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

The Quality Manager should:

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

18 Management Evaluation

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

The results of quality inspections, audits and any other indicators; as well as the overall effectiveness of the management organisation in achieving stated objectives.

A management evaluation should identify and correct trends, and prevent, where possible, future non-conformities.

Conclusions and recommendations made as a result of an evaluation should be submitted in writing to the responsible manager for action. The responsible manager should be an individual who has the authority to resolve issues and take action. The Accountable Manager should decide upon the frequency, format, and structure of internal management evaluation activities.

19 Recording

Accurate, complete, and readily accessible records documenting the results of the Quality Assurance Programme should be maintained by the Training Organization.

Records are essential data to enable an Training Organization to analyse and determine the root causes of non-conformity, so that areas of non-compliance can be identified and subsequently addressed.

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

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

20 Quality Assurance Responsibility for Sub-Contractors

A Training Organization may decide to sub-contract out certain activities to external organisations subject to the approval of the LCAA.

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

The Training Organization should ensure that the sub-contractor has the necessary authorisation/approval when required and commands the resources and competence to undertake the task.

If the Training Organization requires the sub-contractor to conduct activity which exceeds the sub-contractor's authorisation/approval, the Training Organization is responsible for ensuring that the sub-contractor's quality assurance takes account of such additional requirements.

21 Quality System Training

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

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

An introduction to the concept of Quality System;

- a) Quality management;
- b) Concept of Quality Assurance;
- c) Quality manuals;
- d) Audit techniques;
- e) Reporting and recording; and
- f) The way in which the Quality System will function in the Training Organization.

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

22 Sources of Training

Quality management courses are available from the various National or International Standards Institutions, and an Training Organization should consider whether to offer such courses to those likely to be involved in the management of Quality Systems.

Organisations with sufficient appropriately qualified staff should consider whether to carry out in-house training.

23 Quality Systems for small/very small Organisations

The requirement to establish and document a Quality System, and to employ a Quality Manager applies to all Training Organizations.

Complex quality systems could be inappropriate for small or very small Training Organizations 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 Training Organizations should tailor their quality systems to suit the size and complexity of their training and allocate resources accordingly.

For small and very small Training Organizations it may be appropriate to develop a Quality Assurance Programme that employs a checklist. The checklist should have a supporting schedule that requires completion of all checklist items within a specified timescale, together with a statement acknowledging completion of a periodic review by top management.

An occasional independent overview of the checklist content and achievement of the Quality Assurance should be undertaken.

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

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

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

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