



Annex 15

Training Organisations (Excluding Flying Training)

Introduction

This annex is an integral part of the CASA Surveillance Manual (CSM), which should be referenced at all times. To allow for more frequent revisions, this annex can be updated independent of the CSM and other annexes. The process of updating this annex requires verification and approval from its owners and sponsors, as well as from Coordination and Safety Systems (CSS). An updated version can only be published once CSS has finalised the format, with the latest revision history data included in the revision table.

Revision history

Revisions to this annex are recorded below in order of the most recent first.

Version Nº.	Date	Parts / sections	Details
6.0	September 2022	All	Sixth Issue
5.0	December 2019	Section 2.1	Change of where to locate Health Check mandatory elements
4.0	April 2019	Inclusion of Introduction and Revision history. Section 2.1 Section 3 Section 4	These inclusions allow for updates and revisions independent of the CSM and other annexes. Removal of recommended Health Check intervals. Removal of recommended surveillance intervals. Addition of third-party audits.

1 Overview

This Annex provides instructions for conducting surveillance of training organisations, excluding flying training and including Dangerous Goods training providers, Maintenance Training Organisations (Part 147), ATS training provider (Part 143) and contains information relating to the following:

- Systems and Elements
- Systems and Elements – Health Checks
- Surveillance Currency Guide
- Information Sources.

2 Systems and Elements: Training Organisations (Excluding Flying Training)

The audit technique involves assessing the documented system, comparing it against the actual system processes. The system is assessed for compliance and sampling conducted as appropriate. The assessment of the system is achieved by a questioning technique using the four attributes (12 components) of the Management System Model (MSM), see CSM Sections 3.3.3 System attributes – Management System Model and Section 3.3.3.1 – Systems attributes (table).

The CASA description of Training Organisations consists of three systems incorporating seven elements.

Table 1: Systems and Elements

Systems	Elements
Administration	Operations
	Data and Documents
	Personnel Standards
	Personnel Rostering
Training and Examination	Training
	Examination
Quality Assurance	Internal Audit

Table 2: Administration Elements

SYSTEM: Administration	
ELEMENT: Operations	
<p>This element addresses the systems that ensure the authorisation holder contains its operations to those authorised by legislation. This is primarily achieved through the use of a properly structured organisation with appropriate communication channels. Appropriate key personnel are a key link in ensuring that training organisations' operations are not only contained but are appropriately controlled. Examples include the Accountable/Executive Manager, Principal Instructor (however named), Head of ATS School, Chief Examiner (however named) Initial and Operational Training Managers.</p>	
Prompts:	
Accountable manager/Senior management	Organisational chart
Principal instructor	Chief Examiner
Approved locations	System to control training to those authorised
System to contain training to that authorised	Management personnel
Assessors/Assessment processes	Examiners/Instructors
Librarians	Administrative officers and systems
Quality/Curriculum manager	If relevant, external accreditation {including accreditation as a Registered Training Organisation (RTO)}
ELEMENT: Data and Documents	
<p>This element includes (when applicable) the operations manual, (however termed), all technical data, design drawings, regulatory documentation and quality manuals used in the course of operating and maintaining the training organisation.</p>	
Prompts:	
Security of examination material	Duties and responsibilities
List of Instructional and examination staff	List of approved addresses
List of sub-contractors (if any)	Description of facilities
List of approved courses	Notification of changes to organisation
Change control (manuals and exposition)	Distribution systems
Availability of documentation/data etc	Training records
Redundancy of training records and systems data	DAMP documentation

SYSTEM: Administration	
ELEMENT: Personnel Standards	
<p>The training organisation authorisation holder is required to establish and maintain an appropriate organisation, with sound and effective management structure utilising a system of quality assurance. The standard of personnel, including third party providers (if any) is required to be documented detailing induction training, periodic recurrent training, methods to ensure consistency among instructors and any required upgrade training. A process for dealing with unsatisfactory performance should also be documented.</p>	
Prompts:	
Staff Induction training	Upgrade training
Instructor, staff, examiner, assessor records	Certification
Currency	Qualifications
Unsatisfactory performance	Student induction
Third party provider Induction	Temporary staff
Visitors	Qualifying instructors
Qualifying examiners/Assessors	DAMP training and testing
ELEMENT: Personnel Rostering	
<p>This element plays a significant role in achieving effective training as it is through rostering that the authorisation holder ensures that required tasks are carried out with appropriate personnel who have appropriate qualifications and certification, operate in accordance with legislative requirements and certification and have appropriate recency (if applicable) in order to effectively conduct the planned task from the start of the duty period until completion. Rostering should take into consideration fatigue factors associated with long duty days. The roster should, where appropriate, be published and displayed in a prominent position.</p>	
Prompts:	
Roster production	Fatigue issues
Qualifications	Recency
Certification	Temporary staff
DAMP supervision	

Table 3: Training and Examination Elements

SYSTEM: Training and Examination	
ELEMENT: Training	
<p>This element describes the systems and the processes for ensuring the system of training is effective, complete and complies with CASA legislation or both CASA and RTO legislation. Training includes, but is not limited to, such areas as preparation of training materials, instructor guides, workbooks, courses and provision of workshops and execution of training.</p>	
Prompts:	
Organisation of courses	Course material preparation
Classrooms	Equipment
Facilities	Type knowledge
Practical training	Alternate locations
Compliance with regulatory standards	DAMP education and testing
ELEMENT: Examination	
<p>This element describes the systems that make up the control of all systems associated with the conduct of examinations of students under the control of the authorisation holder. In some circumstances this may be extended to staff who are required to undertake periodic examinations. The documented system should account, but is not limited to, the control of personnel supervising examinations and undertaking examinations, conduct of practical tests and assessments and control and issue of certificates. The exam structure should ensure that the relevant syllabus items are covered, that the marking key is appropriate, with multiple choice answers, that the distractors are reasonably realistic; that where a computer-generated question paper is used that there are processes to prevent the same questions recurring.</p>	
Prompts:	
Organisation of examinations	Examination facilities
Exam structure	Coverage of syllabus, marking key
Conduct	Basic/Type practical assessments
Examination assessment, including processes to manage examination failure	Measures to detect/prevent cheating or inappropriate collaboration
Inappropriate practices	Alternate locations
Issue of certificates	Compliance with regulatory standards
DAMP education and testing	

Table 4: Quality Assurance Elements

SYSTEM: Quality Assurance	
ELEMENT: Internal Audit	
This element describes the systems and the processes for ensuring the training organisation systems are functioning and are fit for use. This is accomplished primarily through the authorisation holder’s internal audit processes and closes the loop on the entire training organisation system.	
Prompts:	
Training	Examinations
Analysis of training	Analysis of examinations
Remedial action	Accountable manager annual review
Analysis of courseware/course material	

2.1 Health Check

Health Check mandatory elements are available on the CASA Intranet. Details of the current mandatory elements for each authorisation type are published separately to the CASA website.

3 Surveillance Currency Guide: Training Organisations (Excluding Flying Training)

Surveillance level	Type	Elements
Level 1	Systems Audit	Systems and Compliance
	Health Check	Specific Elements and Compliance
	Post-authorisation Review	Entry Control Elements
Level 2	Operational Check	e.g. Review of RPL assessment, Review of Journal assessment

4 Information Sources

The following is a non-exhaustive list of information sources that could be accessed to support the assessment of an authorisation holder:

- past Surveillance Reports in Sky Sentinel
- surveys
- third-party audits
- regulatory history, findings (Safety Findings and Safety Observations)
- past Surveillance Reports and findings (Safety Findings and Safety Observations)
- routine interaction with the organisation
- EAP information
- Defect Report Service (DRS)
- Regulatory Service activity
- information gathered by the non-AOC authorisation holder's internal assurance processes
- external information gathered from industry or other government agencies
- Enforcement action
- risk management plans provided by the authorisation holder.

A large portion of this information is available to the surveillance team and authorisation management team via the Data Warehouse using the BusinessObjects application.

Note: For advice on where and how to access required information, refer to CSM Chapter 5 – Information Capture and Access.