

Australian Government Civil Aviation SafetyAuthority

PRINCIPLE

(OPS.142) Integrated and multicrew flight training, contracted training and checking

February 2025

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Acknowledgement of Country

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Artwork: James Baban.

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Terminology

Acronyms and abbreviations

Table 1. List of acronyms and abbreviations

Acronym/abbreviation	Description
AC	advisory circular
AIP	Aeronautical Information Publication
AOC	air operator's certificate
AMC	acceptable means of compliance
ARN	Aviation Reference Number
ATSB	Australian Transport Safety Bureau
СААР	Civil Aviation Advisory Publication
CASR	Civil Aviation Safety Regulations 1998
CEO	chief executive officer
DAMP	drug and alcohol management plan
FDAP	flight data analysis program
FOI	flying operations inspector
FSB	Flight Standards Branch
FSTD	flight simulation training device
HF	human factors
HF/NTS	human factors principles and non-technical skills
НОО	head of operations
ICAO	International Civil Aviation Organization
IFR	instrument flight rules
LIRA	Legal, International and Regulatory Affairs
МТОЖ	maximum take-off weight
PIC	pilot in command
QTG	qualification test guide
SMS	safety management system
SM	safety manager

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Acronym/abbreviation	Description
SOP	standard operating procedure
SSI	safety systems inspector
STOM	synthetic trainer operations manual
TEM	threat and error management
VFR	visual flight rules
VMC	visual meteorological conditions

Definitions

Table 2. List of definitions

Term	Definition	
Authorised Part 142 activity	For a Part 142 operator, is a Part 142 activity mentioned in the operator's Part 142 authorisation.	
COMAT	Company materials which include dangerous goods of the operator – such as aircraft parts (e.g. batteries, chemical oxygen generators oxygen cylinders etc.)	
contracted checking	Checking conducted by a Part 142 operator for a contracting operator	
contracted training	Training that is: (a) conducted by a Part 142 operator for a contracting operator; and (b) the responsibility of the contracting operator under these Regulations.	
contracting operator	An aircraft operator who enters into a contract with a Part 142 operator for the Part 142 operator to conduct training or checking that is the responsibility of the aircraft operator under these Regulations.	
organisation	A product or service provider, operator, business, and company, as well as aviation industry organisations	
Part 142 activity	 Any of the following conducted in an aircraft or a flight simulation training device: (a) Part 142 flight training; (b) contracted training; (c) contracted checking. 	
Part 142 authorisation	 is: (a) an AOC that authorises the conduct of a Part 142 activity in an aircraft; or (b) a certificate under Division 142.B.2 that authorises the conduct of a Part 142 activity in a flight simulation training device. 	

Term	Definition
Part 142 flight training	Any of the following:
	 (a) an integrated training course for the grant under Part 61 of a private pilot licence or commercial pilot licence;
	 (b) training for the grant under Part 61 of a multi-crew pilot licence, air transport pilot licence or flight engineer licence;
	(c) multi-crew cooperation training
	(d) training for the grant under Part 61 of a type rating other than a type rating mentioned in an instrument under regulation 142.045;
	(da) training, conducted as a multi-crew operation, for the grant under Part 61 of a flight crew rating other than a type rating;
	(e) training, conducted as a multi-crew operation, for the grant under Part 61 of a flight crew endorsement other than:
	i. a design feature endorsement; or
	ii. a flight activity endorsement;
	 (f) training that is given as part of a flight review that is conducted as a multi-crew operation;
	(g) differences training:
	 that is required as mentioned in regulation 61.780, 61.835 or 61.1370 for a variant covered by a type rating that is not a type rating mentioned in a legislative instrument under regulation 142.045; and
	ii. that is not conducted by an operator that has a training and checking system that is in accordance with the requirements of Part 119 or 138.

Reference to regulations

Unless specified otherwise, all subregulations, regulations, Divisions, Subparts and Parts referenced in this Principle are references to the *Civil Aviation Safety Regulations 1998* (CASR).

Revision history

Amendments/revisions for this principle are recorded below in order of the most recent first.

Table 3.Revision history table

Version No.	Date	Parts / Sections	Details
1.0	February 2025	All	First issue

1. Assessment scope

1.1 Assessment of initial application

Inspectors use this protocol document suite to assess an application for an air operator's certificate (AOC) or certificate under *Part 142 — Integrated and multi-crew pilot flight training, contracted training and contracted checking.*

Regulation 11.055 states that if an application is submitted for an authorisation in accordance with these regulations, CASA may grant the authorisation if the applicant meets the criteria specified in the regulations.

The assessment of the application will involve verification through a range of activities, including:

- · desktop assessments of the documentation provided
- site inspection of facilities
- assessment of key personnel.

CASA has produced a <u>sample exposition</u> (Part 142 SE) to assist operators within a certain scope in developing their exposition. Applicants may choose to adopt the Part 142 SE with minimal revision and submit it as the basis of their exposition.

CASA has also produced sample syllabuses to assist applicants with syllabus development. The sample syllabuses may be useful to the assessor as examples of a means of compliance.

An applicant's use of the Part 142 SE and sample syllabus templates significantly reduces the assessment time required by the inspector.

Before the issue of a Part 142 AOC or a Part 142 certificate can be recommended, the inspector will verify the application meets the requirements for the proposed operation.

1.2 Assessment of a significant change application

Inspectors will also use this protocol suite to assess a significant change or an approval that is not covered by its own specific protocol, such as addition of a Part 142 activity or opening of a new training base. In this instance, the inspector will define the scope of the assessment in the *Assessment summary* tab of the worksheet (OPS.142). Only those sections of the worksheet that address the significant change need be completed.

1.3 Assessment worksheet user instructions

An initial application for a Part 142 authorisation may require a team of inspectors across different disciplines. A project manager will be appointed to manage the worksheet and ensure all tasks are completed.

This principle provides guidance to the inspector when using the associated *Worksheet (OPS.142)* - *Integrated and multi-crew flight training, contracted training and checking.* The worksheet provides inspectors with a regulation-based tool for recording the outcomes of the assessment. It is set out as follows:

- user instructions
- assessment worksheets
- assessment summary
- approval data sheet
- assessment worksheets
 - applicant
 - Part 142 activities
 - internal training and checking
- additional assessment information

• revision history.

Some of the worksheet areas will point to another protocol suite to cover that matter. Once the inspector has completed that assessment the results can be recorded in the relevant section of this worksheet.

In this principle document chapters 2-4 provide specific guidance that aligns to the associated sections (tabs) in the assessment worksheets.

1.4 Application project management

The processes outlined in this section assume a large and complex application. Smaller, less complex applications may not require the same level of resourcing. In small applications, the project team may consist of a flying operations inspector (FOI) and airworthiness inspector (AWI). In this case one of the inspectors shall be appointed as the project manager.

CASA assessment of an AOC or certificate application must be treated as a project. It means CASA must have:

- a formal and structured method of managing the certification activities
- activities that have specifically defined outputs that are to be delivered according to a set schedule agreed to by CASA and the applicant
- a clear definition of roles and responsibilities of the resources involved.

There are two projects in the processing of an AOC or certificate application:

- the applicant's management of the process
- CASA's management of the process (including all applicable checklists).

Both projects are managed separately in order to achieve certification of the intended operations. It is important that the roles and responsibilities of both CASA and the applicant are clearly understood. It is not the role of the CASA project manager to manage the applicant's project.

1.4.1 Project manager

The project manager is responsible for managing the overall assessment process, coordinating the project team members and ensuring that sufficient resources will be available for CASA to meet the project plan (formerly known as schedule of events). When the project manager is satisfied that the operator can meet the requirements of the *Civil Aviation Act 1988* (the Act) to hold an AOC or Part 142 of CASR to hold a certificate, the project manager will make a recommendation to the national manager.

The project manager must:

- chair the pre-application and formal application meeting (if required)
- · coordinate the creation of the task lists and hours for the estimate
- monitor the progress of work of all project team members against projected delivery timeframes and availability of resources
- monitor progress of work of all project team members against the estimated cost of work and ensure any
 projected or actual increase in cost to the applicant, above what was provided in the original estimate, is
 communicated to the applicant
- ensure the communication protocol enables a free flow of information between CASA and the applicant, including regular meetings with the applicant's project manager
- arbitrate in any dispute between CASA and the applicant
- provide a formal point of contact between CASA and the applicant
- coordinate the work done by the certification teams
- keep the certificate team manager informed on the progress of the project
- maintain records of all formal meetings

- consider the recommencement of initial assessment process should a significant change in the application occur
- following the document evaluation and inspection phases, review the recommendations of the project team, and complete the assessment summary and approval data sheet located in the *Worksheet* (*OPS.142*) Integrated and multi-crew flight training, contracted training and checking.

The project manager must review the draft AOC or certificate prior to making a final recommendation to the delegate on:

- whether or not the AOC or certificate should be issued, and if not, the reasons for not proceeding
- if conditions in accordance with section 28BB of the Act are to be imposed on the AOC, the reasons for the conditions
- if conditions in accordance with regulation 142.110(5) are to be imposed on the certificate, the reasons for the conditions
- advise the applicant if CASA is unable to meet the scheduled assessments.

1.4.2 **Project team members**

Flying operations inspector (FOI)

If conducting an inflight assessment from a control seat the FOI must be listed on the national operations register and:

- be qualified under Part 61 for the aeroplane type
- meet recent experience requirements.

The FOI will conduct the flight assessment in accordance with the requirements contained in the <u>Flying</u> <u>Qualification Training Handbook (FQTH)</u>.

If an FOI cannot meet the above requirements and there is no other person qualified, an FOI who has experience on an aeroplane type which is substantially similar shall be used for the assessment. If there is no FOI that meets the requirements of "substantially similar" the project manager will consult the National manager to determine who is the most appropriate FOI to conduct the flight assessment.

Airworthiness inspector (AWI)

The AWI must be familiar with the aircraft types that the applicant proposes for the AOC.

Where the applicant requires minimum equipment lists (MELs), system of maintenance, approved maintenance plan or reliability programs approved by CASA:

- the AWI must assess those approvals in accordance with the applicable protocol suites
- the CASA inspector must have training or experience on the actual aircraft type or a similar type to carry out those assessments
- prior to carrying out these assessments the CASA inspector must have undertaken CASA training for these types of assessments.

If an AWI cannot meet the above requirements and there is no other person qualified, an AWI who has experience on an aeroplane type which is substantially similar shall be used for the assessment. If there is no AWI that meets the requirements of substantially similar the project manager will consult the National Manager to determine who is the most appropriate AWI to conduct the assessment.

Dangerous goods inspectors (DGI)

Applications for carriage of dangerous goods by the operator or COMAT, being company materials such as aircraft spare parts (e.g. aircraft batteries), require assessment by a DGI.

Where the operator does not intend to carry dangerous goods, or if the level of dangerous goods requested for the proposed operation is unclear, DGIs are available to assist the project manager in making an initial determination.

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Other inspectors

The project manager will determine the need for other disciplines in order to assess the application. Other disciplines which may need to be involved are:

- safety systems
- alcohol and other drugs.

1.4.3 Project team guidelines

It is in the best interest of CASA and the applicant to ensure that the assessment of the AOC application is conducted smoothly and expediently. The following must be observed:

- the CASA project team and the applicant must maintain ongoing contact to keep abreast of any changes that impact the project
- inadequacies must be documented in CASA records and communicated to the applicant at the earliest possible stage
- the applicant must inform CASA of any changes to the schedule of events, addressing deficiencies or ready for the verification and testing phase. CASA must remind the applicant that schedule changes can affect completion of necessary reviews and result in delays
- much of the communication between CASA and the applicant will be informal and verbal. Project team members must ensure that any commitments or deficiencies are notified and confirmed in writing in a timely manner. The CASA project manager must be notified of these actions
- the CASA project manager must keep the CASA project team members informed of negotiations and significant developments
- disputes must be arbitrated expeditiously. Where an agreement cannot be reached between CASA and the applicant, the matter, along with recommendations, must be documented and referred initially to the CASA project manager.

1.4.4 Project planning

Factors affecting project timelines include:

- quality of the applicant's submissions
- the nomination of suitable key personnel
- applicant's ability to meet requirements such as aircraft inspections and proving flights
- the applicant's timely response to CASA advice on identified deficiencies
- availability of the applicant's and CASA's resources
- unforeseen circumstances.

For CASA to allocate resources for the timely assessment of the application, the applicant must submit their proposed project plan to CASA, outlining in detail the schedule by which they will make their facilities, key personnel and aircraft available for CASA assessment and inspection.

Based on the information the applicant delivers, CASA will develop a project plan.

1.4.5 **Project monitoring**

Project monitoring is an essential aspect of project management. It covers both the areas of budget (estimate), and the tasks required to be completed by CASA.

It is the responsibility of the project manager to monitor and review the project plan and to track the overall actual costs against the estimate. The project manager must inform Regservices of any cost variation likely to exceed the estimate.

A project diary must be used to track tasks, hours and who conducted the work. The purpose of the project diary is to ensure accurate final cost of the project and to be able to justify, in reasonable detail, the work that

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has been carried out by CASA. The project diary is to be maintained by the project manager (or by each inspector for a multi-member team) on a regular basis.

The actual total hours spent by the project team must be monitored against the total estimate to determine if the original estimate is likely to be exceeded and a revised estimate needs to be issued by Regservices.

1.5 Onsite inspections and verification

Regulation 11.045 permits CASA to request a demonstration of a service or facility.

The requirement for an onsite inspection will depend on the nature and complexity of the system being assessed. To ensure a system is operating and effective, the inspector may need to interview staff, observe a process or inspect facilities. Inspectors will use <u>Protocol suite (OPS.26) Checklists</u> for onsite inspections.

1.5.1 Work health and safety

Inspectors conducting an industry onsite visit must assess potential work health and safety (WHS) risks for the site and take steps to mitigate identified risks. If clarification is required on the site WHS risks or mitigations, confirm with site contacts prior to the visit. In addition, inspectors must receive a work health and safety briefing/induction to the location and confirm emergency procedures and access to first aid treatment. Identified risks must be documented on your worksheet along with the steps taken to mitigate them. For a list of identified potential onsite WHS risks and the controls that are part of CASA's WHS management system refer to <u>WHS Checklist for 3rd party workplaces</u> and consider which risks are relevant to the site being visited. Ensure you have appropriate personal protective equipment (PPE) where required.

1.6 Contracted training and/or checking

Contracted training and contracted checking are Part 142 activities where a Part 142 authorisation holder develops a training and checking program that will meet an operator's (*contracting operator*) recurrent training and checking requirements under Part 119 (and their specific operations Part - 121,133 or 135) or Part 138. In this situation, it is the Part 142 authorisation holder who develops and manages the training and checking program.

The head of training and checking of the contracting operator remains responsible for ensuring their obligations under Part 119 and/or Part 138 are met.

It is **not** contracted training and contracted checking when an operator approaches a Part 142 operator to provide qualified instructors and examiners to conduct recurrent training and checking in accordance with the operator's training and checking manual.

The key difference between the concept of *contracted training* and *contracted checking*, versus contracting a person to conduct recurrent training and checking, is who has developed and owns the recurrent training and checking program.

Example

An operator who does not have suitably qualified flight crew to conduct recurrent training and checking may approach a Part 142 operator to provide instructors/examiners to conduct the training and checking activities.

This differs from when an operator engages a Part 142 authorisation holder for the purpose of Part 142 flight training, where the training is for the grant of a Part 61 qualification.

Example

An operator requires flight crew to hold a B777/787 type rating. The operator may engage a Part 142 authorisation holder to deliver the flight training and flight test to enter the qualification on a Part 61 flight crew licence.

See section 3.6 of this Principle for more information.

1.7 Relationship with Part 61

Training courses for the grant of all Part 61 licences, ratings and endorsements must be competency-based and use the competency standards listed in the Part 61 Manual of Standards (MOS).

CASA's sample syllabuses are based on competency-based training and assessment principles and provide one way to incorporate Part 61 MOS competencies into a training curriculum.

Part 61 Manual of Standards

Competency standards define the skills and knowledge required to attain an authorisation. Schedule 1 of the Part 61 MOS provides a summary of the standards for flight competency and aeronautical knowledge that are applicable to Part 61 authorisations.

Under Part 61, an applicant for a flight crew licence, rating or endorsement must have received flight training in, and have been assessed as competent against, each of the flight competency standards mentioned in the Part 61 MOS for the particular licence, rating or endorsement.

Training for a Part 61 licence, rating or endorsement must be competency based – by satisfying each of the flight competency standards specified in the Part 61 MOS for the authorisation.

These flight competency standards, contained within Schedule 2 of the MOS, are described within units of competency which each represent a discrete function.

Flight training syllabuses and competency assessments must take into account all components of a unit of competency, namely:

- the elements (which provide further detail to the various functions which must be carried out)
- the performance criteria (which are evaluative statements contained within each element of competency, specifying what is to be assessed)
- the range of variables (which add definition to the performance criteria by elaborating on critical or significant aspects of the unit of competency, and also detail contexts and conditions that should be applied)
- the underpinning knowledge (which describe specific knowledge applicable to a unit of competency).

Aeronautical knowledge standards and examinations

Aeronautical knowledge standards, contained in Schedule 3 of the Part 61 MOS, are comprised of:

- units of knowledge
- elements, which identify a knowledge area within a unit of knowledge
- topics (if any), further defining a knowledge area within an element
- specific topic content, describing the required knowledge in detail.

The standard of knowledge required of a course participant by each unit of knowledge mentioned in Schedule 3 is the ability to demonstrate, to the appropriate level, knowledge of the elements, topics and specific content described in each unit.

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Part 61 describes the aeronautical knowledge examination requirements for licences, ratings and endorsements. Schedule 4 of the Part 61 MOS sets out each examination, examination codes, pass standards and the time limit for each sitting.

Flight test standards

Schedule 5 of the Part 61 MOS contains flight test standards. CASA flight test report forms refer directly to the competencies, derived from Schedule 5 of the MOS, that the flight examiner is required to assess.

2. Applicant

2.1 General

The application form requires the nominee to make a statement about their history. The history should include any accidents or incidents or CASA enforcement action that occurred within the previous 5 years.

2.1.1 Application for a Part 142 authorisation

Fitness and propriety

The concept of a 'fit and proper' person is a fundamental one in many professions, jurisdictions and organisations as it is used to determine a person's honesty, integrity and reputation to confirm that they are fit and proper for the role they are undertaking.

Subregulation 142.085(3) describes the matters CASA may consider in deciding whether a person is a fit and proper person to be issued an AOC authorising the conduct of Part 142 activities in aircraft.

Subregulation 142.110(3) refers to the matters mentioned in subregulation 142.085(3) (considerations for the issue of a Part 142 AOC), as those that CASA may consider in deciding whether a person is a fit and proper person to be issued a certificate authorising the conduct of Part 142 activities in flight simulation training devices.

CASA must be satisfied that each of the proposed key personnel are fit and proper persons to be appointed to the position.

In assessing fitness and propriety, CASA may take into account a number of matters including the following:

- the nominee's record of compliance with regulatory requirements (in Australia or elsewhere) relating to aviation safety and other transport safety
- the applicant's demonstrated attitude towards compliance with regulatory requirements (in Australia or elsewhere) relating to aviation safety and other transport safety
- the applicant's experience (if any) in aviation
- the applicant's knowledge of the regulatory requirements applicable to civil aviation in Australia
- the applicant's history (if any) of serious behavioural problems
- any conviction (other than a spent conviction, within the meaning of Part VIIC of the Crimes Act 1914) of the applicant (in Australia or elsewhere) for a transport safety offence
- any evidence held by CASA that the applicant has contravened:
 - the Act or these Regulations
 - a law of another country relating to aviation safety
 - another law (of Australia or of another country) relating to transport safety.
- any other matter relating to the fitness of the applicant to hold the authorisation.

If any matter is identified that raises concerns as to whether the nominee is a fit and proper person, the inspector must request a peer review by their manager and Legal, International, and Regulatory Affairs (LIRA) before proceeding with any action that would cancel or refuse the application.

3. Part 142 activities

3.1 Organisation

3.1.1 Organisational structure

Before a recommendation can be made for the issue of an AOC, inspectors must verify that the AOC applicant is capable of satisfying all the matters referred to in subsection 28(1)(b) of the Act. Before a recommendation can be made for the issue of a Part 142 certificate, inspectors must verify that the certificate applicant is capable of satisfying the applicable matters referred to in paragraphs 142.110(1)(a)-(f) of CASR.

The size and scope of the Part 142 activities will determine the required management structure. A sound and effective management structure, essential to the achievement of safe Part 142 activities, will display the following organisational structure and features:

- the chief executive officer (CEO) of the organisation has appropriate experience to conduct or carry out the Part 142 activities safely
- the duties and responsibilities of management or supervisory positions are clearly defined with lines of communication and areas of responsibility clearly established
- the reporting lines for instructors appointed by the HOO to have responsibility for particular Part 142 flight training are clearly defined
- the number and nature of management or supervisory positions are appropriate to the size and complexity of the organisation
- the reporting lines for sub-organisations lead to the respective head of that organisation
- the number of managerial positions must be such that effective control and responsibility is clearly seen to rest with particular individuals.

Flight and duty times of flight instructors and/or flight examiners holding management or supervisory positions should be reviewed to ensure that there is an appropriate balance between flying duties and managerial duties.

The inspector should consider the potential impact on any person holding a managerial position who may be involved with any other legal entity and the impact that involvement may have on their ability to manage the AOC and/or certificate effectively.

Organisation and personnel

Regulation 142.160 requires the operator to take into account certain matters to ensure it maintains an organisational structure that effectively manages its authorised Part 142 activities.

Considerations in relation to these matters include:

- for the conduct of multiple activities, departments and individual branches that are responsible for each activity may be established
- for large fleets and multiple aircraft and/or FSTD types, fleet managers may be assigned responsibility for aircraft and FSTDs of a particular type
- for multiple training bases, to ensure effective operational control over personnel and course participants
 and the safe management of the activities at each base, the HOO may delegate some of the duties
 associated with their responsibilities (but not the responsibilities themselves) to an appropriate person, to
 act on their behalf. A senior base instructor/manager with a direct reporting line to the HOO should be
 nominated at each base, particularly where additional training bases are remote
- where the HOO is unable to provide direct supervision due to the number of personnel, managers and supervisors to provide direct supervision on behalf of the HOO may be appointed. Senior instructors may be appointed to provide supervision and mentoring of junior instructors
- the number of management or supervisory positions established are sufficient to provide adequate supervision of instructors, examiners and course participants.

3.1.2 Chain of command

The organisational structure is the basis for the organisation's chain of command. The chain of command provides the reporting structure of the organisation and must be appropriate to ensure that the activities can be conducted safely.

The CEO should be positioned at the pinnacle of the organisational hierarchy, demonstrating the overall responsibility and accountability of the position.

The operator should demonstrate that clearly defined reporting and communication lines exist between key personnel, management, supervisors, persons appointed by the HOO to have responsibility for particular Part 142 flight training, and other personnel.

For operators who will conduct activities in aircraft, to ensure the safety manager (SM) is not subject to undue influence the organisational structure should provide that the SM reports either directly to the CEO, or to senior management with a formal direct line of communication with the CEO. The SM should remain independent from operational departments.

The operator should demonstrate that a formal communication line exists between the SM and the HOO.

An organisational structure that incorporates departments and branches should show that the reporting lines for each branch manager lead to the manager of the associated department, and reporting lines for instructors and examiners lead to the associated branch manager.

Evidence that flight instructors and examiners will report to the HOO should be included; this may be demonstrated through direct or indirect reporting lines which ultimately lead to the HOO. Reporting lines between the HOO and any management or supervisory personnel at each training base should also be clearly defined.

To ensure that each managerial position has a suitable span of control, the organisational structure should demonstrate that the number of managerial positions is appropriate to the size and scope of the proposed Part 142 activities.

For the chain of command to be effective, the delegation of responsibility and accountability should rest with personnel holding qualifications and experience that are relevant to the position.

3.1.3 Key personnel absence

The exposition must include a process to ensure all key personnel positions are filled. Operators may provide for alternate key personnel authorised to carry out the responsibilities of key personnel when the substantive person is absent or cannot carry out their responsibilities. For a person to be authorised to carry out key personnel responsibilities, they must be approved as a significant change under regulation 142.145. Use Protocol suite OPS.10 Key personnel assessment.

Key personnel absence refers to not being present, such as being on leave or out of the office temporarily. In this instance, if the key person intends and is still able to carry out their responsibilities, the position is still considered filled.

The exposition must include a process to notify CASA in the event that a key person cannot, or is unlikely to be able to, carry out their duties for greater than 35 days. To be suitable, notification to CASA must be made as soon as the operator becomes aware that the key person cannot, or is unlikely to be able to, carry out their responsibilities. The operator's process for notifying CASA of key personnel absence should demonstrate that:

- 35 days commences at the time the key personnel cannot carry out, or is likely to be unable to carry out, their key personnel responsibilities
- as soon as the operator becomes aware, they notify CASA within either 24 hrs or 3 days depending on whether there is an authorised alternate available to take over the responsibilities.

For operators conducting activities in aircraft, or in aircraft and FSTDs, the inspector should ensure that the operator has a process in place that prevents the CEO and SM or HOO and SM holding the same position for no more than 7 days in unforeseen circumstances. For operators who conduct activities in FSTDs only, the inspector should ensure that the operator has a process in place that prevents the CEO and QAM or HOO and QAM holding the same position for no more than 7 days in unforeseen circumstances.

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When considering an unforeseen circumstance, the inspector should consider the events which lead to the absence. To be suitable, the operator's definition of an unforeseen circumstance should indicate that it was unforeseeable and beyond the operator's control.

An approval under regulation 142.040 must meet the requirements in the Operations protocol framework.

3.1.4 Familiarisation training

A Part 142 operator must ensure that, before a person appointed as any of the operator's key personnel begins to carry out the responsibilities of the position, the person has completed any training that is necessary to familiarise the person with the responsibilities. The operator must describe the conduct of this training in their exposition, including details of the training syllabus and how records of achievement are documented. To be suitable the training should include such matters as:

- outline of the regulations
- organisational structure
- the safety management system (if applicable)
- the quality assurance management system (if applicable)
- internal training and checking system
- exposition structure
- the scope of the authorised Part 142 activities.

3.2 Key personnel

3.2.1 Chief executive officer

Use Protocol suite (OPS.10) Key personnel assessment.

3.2.2 Head of operations

Use Protocol suite (OPS.10) Key personnel assessment.

3.2.3 Safety manager

Use Protocol suite (OPS.10) Key personnel assessment.

3.2.4 Quality assurance manager

Use Protocol suite (OPS.10) Key personnel assessment.

3.3 Exposition

An exposition is a document, or set of documents, which describes how an operator will conduct its operations safely. It sets out, both for CASA and for operator personnel involved in the operation, how to comply with all applicable legislative requirements and manage the safety of the operation, how the activities are conducted and managed, and how instructors and course participants are supervised.

If structured as a set of documents, the exposition might include a 'principal/primary document' which contains all the common information applicable to operator activities. Separate manuals can then be established for specific aspects of certain activities, and the associated systems and procedures applicable to those activities. These separate manuals form part of the operator exposition.

In constructing the exposition content, the operator should refer specifically to the list of items in the regulation to ensure completeness of the exposition. The exposition does not need to include Part 91 General operating and flight rules that are intrinsic to the operation of an aircraft and may rely on the Australian Aeronautical Information Publication (AIP) or foreign equivalent to provide that information.

Example

Regulation 91.265 prescribes the PIC obligations for minimum height rules for populous areas and public gatherings, and the operator's exposition would not need to include specific instructions to the PIC. However, if the operator chooses to place additional obligations that exceed the Part 91 requirements, the exposition will contain those instructions.

To be suitable, the exposition must be managed under a document control system that allows personnel to readily identify the current version. When assessing the content of the exposition, the inspector should ensure that the quality, readability and usability is fit for purpose.

Naming of alternate key persons in the exposition

If the operator has alternate key personnel authorised to carry out the responsibilities of the substantive key person when they are absent or unable to do so, the exposition must include the full name of the person authorised to act on behalf of each key person during any period of temporary absence.

For operators without alternate key personnel, Part 18 of CASA EX32/24 provides relief from the requirement to include, in the exposition, the name of the person authorised to carry out the responsibilities of the position when the position holder is absent from the position or is unable to carry out the responsibilities.

The exposition of a Part 142 operator must include a description of how the operator will manage the responsibilities of the position of each of its key personnel when the position holder is absent from the position or cannot carry out the responsibilities. Where alternate key persons are not provided for, an operator may state that the operator will not conduct activities in the circumstances mentioned.

See also the requirements in section 3.1.3 of this principle.

3.3.1 Human factors and non-technical skills training

The operator's HF/NTS training program, which covers both human factors (HF) principles and non-technical skills (NTS), must be appropriate for the size, the nature and complexity of its activities. The program must be described in the operator's exposition.

The primary objective of an HF/NTS program is to support human performance and improve safety by providing personnel with knowledge of HF principles and NTS, and the application of this knowledge toward ensuring safe and efficient operations. The program should provide instructors and examiners with an understanding of relevant HF hazards, how and why errors (theirs and their students) may occur during Part 142 activities, and how to minimise the potential for errors and/or to limit any consequences. Although not required by legislation, the operator may choose to manage its HF/NTS obligations through its internal training and checking system.

HF/NTS training is required for instructors and examiners.

ICAO identifies five human performance principles that outline how the performance of people is influenced by different factors:

- **Principle 1:** People's performance is shaped by their capabilities and limitations.
- **Principle 2:** People interpret situations differently and perform in ways that make sense to them.
- **Principle 3:** People adapt to meet the demands of a complex and dynamic work environment.
- Principle 4: People assess risks and make trade-offs.
- **Principle 5:** People's performance is influenced by working with other people, technology and the environment.
 - Note: Advisory circular (AC) 119-12, while written for air transport operations, provides general guidance on an HF/NTS training program. Inspectors may also refer to *ICAO Doc 9683—Human factors training manual* for further guidance.

HF/NTS components

To be suitable, the HF/NTS training program must cover both human factors principles and non-technical skills.

HF principles

Human factors principles are knowledge elements outlining how the performance of people is influenced by different factors. Knowledge and awareness of HF principles help shape, improve and maximise human performance within the aviation system.

An operator's HF/NTS training program must include training and assessment related to HF principles to maximise operational safety outcomes.

To be suitable, the HF principles training program should include, but is not limited to:

- safety culture
- human performance principle basics
- stress/stress management
- fatigue/fatigue management
- workload management.

Non-technical skills

Operators must also include appropriate operational behaviours and skills training – this is the NTS component of the training program. NTS is applied specific human competencies which may minimise human error in aviation.

To be suitable, the NTS training program should include, but is not limited to:

- communication
- teamwork
- situational awareness
- decision making
- threat and error management
- human information processing.

Examples of specific course focus areas

Though not an exhaustive list, the following are examples of specific areas of focus that may be seen within a Part 142 HF/NTS course:

- Communication and anticipation of communication difficulties associated with students and novice performance. For example, heavy student workload and low level of knowledge of 'jargon' and standard aviation phraseology.
- Workload management and information processing, with a focus on the influence of instructor workload (associated with teaching) on accurately and effectively processing available information and maintaining awareness of potential internal and external flight safety hazards.
- Teamwork, with a focus on the difficulties of establishing coordination of actions and associated positive team behaviours with students especially during early lessons.
- Decision making, this may include influences on decisions such as the pressure to allow students to be exposed to learning opportunities while maintaining adequate safety margins. For example, approach to stall and stall recovery when to assume control.

Third party HF/NTS training program provider requirements

HF/NTS training activities conducted by a contracted third-party provider must meet the requirements mentioned in the operator's exposition. If contracted facilitators are used, the operator must be satisfied that the contracted personnel hold appropriate qualifications.

If the operator relies on a third party's HF/NTS training program to meet their obligations under the regulations, the inspector should ensure the operator has a process to validate the training. To be suitable, the inspector should consider the following:

- Does the exposition include a process for the operator to be able to assess any third-party provided HF/NTS training, to ensure it meets the requirements of the exposition, the activities conducted and the operational environment?
- Does the exposition include a process to ensure third-party training organisations have appropriately trained and competent staff, in relation to HF/NTS course delivery?
- Do any third-party training materials appropriately address the identified human performance risk, relevant to the activities conducted and the operating environment?

HF/NTS assessment process

To be suitable, the HF/NTS training program should include an assessment which may include both theoretical and practical assessments for HF/NTS competencies.

Assessment may be carried out using different methods, including:

- short answer or forced choice (multi-choice) exams
- observation of tasks (this may form part of competency assessment) •
- demonstration during practical exercises •
- informal assessment of participation by the HF/NTS instructor.

Recognition of prior learning

If an operator chooses to recognise a person's previous HF/NTS training, the operator must ensure the training meets their operational requirements. A suitable process would include a gap analysis, considering the following matters:

- Do assessment processes allow for confirmation of achievement of learning outcomes for both HF principles and NTS elements, with competencies mapped against both elements?
- Is the training assessment focused on learning and building expertise, rather than on rote memorisation of facts, rules or procedures?
- Does the training assessment assist in clarifying people's responsibilities in ensuring they continue to reflect best practice based on lessons learned?
- Does the training program allow students to reflect on their own performance and address any identified deficiencies?

3.3.2 Responsibilities of personnel (other than key personnel)

An example of an assigned responsibility under Part 142 for a personnel member (other than an instructor) may be for the upkeep of the operator's reference library. Details of the responsibilities must be included in the exposition. The level detail of the responsibility given within the exposition may include the duties to be carried out to ensure the operator meets the relevant regulatory requirements. The exposition need not name the persons responsible for fulfilling these duties.

3.3.3 **Description of authorised Part 142 activities**

The operator's exposition must clearly describe:

the licences, operational and type ratings and other courses for which the operator will provide flight training

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• the contracted training and contracted checking activities, including details of the checks the operator intends to conduct.

3.3.4 Other operations

If the operator conducts or proposes to conduct operations other than Part 142 activities, for example air transport or aerial work, these must be described in the exposition.

Training for the grant of design feature or flight activity endorsements under Part 61 does not fall under Part 142, however an operator may conduct this training if the instructor providing the training is appropriately qualified. If the operator intends to conduct this training, the exposition should provide details of the training, including training plans and syllabuses for each endorsement.

3.3.5 Third party suppliers

The exposition must provide details of any third-party relationships between the operator and third-party suppliers (e.g. a supplier of aircraft fuel or aircraft performance data, or leased aircraft etc.).

If the supply relates to an FSTD, a description of the management of leases as well as the relationship with, and responsibilities of, the lessee (the operator) and the owner (the supplier of the FSTD) must be provided in the exposition or subordinate manual – such as the quality assurance management system manual.

3.3.6 **Operations manual**

The operator's operations manual must contain adequately documented policies, processes and procedures to control the safety of flight operations under Part 142.

For operators conducting activities only in FSTDs, the operations manual may be an equivalent manual such as a synthetic trainer operations manual.

3.3.7 Dangerous goods manual

Part 92 of CASR applies to the consignment and carriage of dangerous goods by air. If the operator intends to carry dangerous goods, regulation 92.055 prescribes the requirement for an operator to provide a dangerous goods manual.

Regulation 92.055 does not require the dangerous goods manual to be a standalone document, the operator may choose to meet the requirements of the regulation as a chapter to the exposition. Use the <u>Dangerous</u> <u>Goods manual evaluation checklist</u> (form 1441) for the assessment.

3.3.8 Reference library

The operator's exposition must include details of a reference library in accordance with regulation 142.075 and/or regulation 142.125. An important part of the reference library is access to up-to-date sections of the AIP or its foreign equivalent (if required).

3.4 Management of change

Operators who are engaged across multiple CASR Parts can construct a management of change (MOC) process that is applicable to all their operations.

Example

An operator may have sections of their company that hold authorisations under Parts 42, 119, 135, 142 and 145. If preferred by the operator, they could construct an MOC process that is common to all their operations regardless of the CASR Part under consideration.

3.4.1 Significant change

The operator's exposition must detail a process for the identification of a significant change. To be suitable, if an operator uses their own definition of what constitutes 'significant change', the inspector must be satisfied that the operator's definition is not less restrictive than the regulation.

Paragraph 142.340(1)(k)) requires that the operator's exposition includes 'a description of the procedures by which the operator conducts and manages the activities...'. To address this requirement, the operator's documentation should detail how an application will be made to CASA, and who within the organisation is authorised to make such an application.

Except for key personnel changes under subregulation 142.140(2), a significant change cannot be implemented until CASA has approved the change. The operator must have a process for ensuring a significant change will not be implemented until CASA approval is received.

3.4.2 Non-significant change

By having a process that identifies significant changes, the operator will by default identify all other changes as non-significant changes. A common mistake is that operators may only consider the prescriptive components for the definition of significant change under subparagraphs 142.030(a) and (b), and automatically classify all other changes as non-significant. To be suitable, the inspector must confirm the operator's management of change process adequately covers the requirements for the definition of significant 142.030(c) and (d).

Although the regulations require the operator to notify CASA of a non-significant change, they do not specify the timing of that notification. To be suitable, the inspector should confirm that the operator has developed a process to ensure CASA is notified at the same time as the operator's personnel. However, in some circumstances, the method of communication to the operator's personnel may not coincide with the notification to CASA – due to the methods used.

Example

Some operators may use their rostering and scheduling system to communicate non-significant changes to their exposition, whereas CASA requires an operator to provide notification via the non-significant change form (CASA-04-5819).

Operators may choose to align their exposition amendments to coincide with the AIRAC cycle or, in the case of large expositions, an amendment cycle, and in the interim use an 'operational notice' (however named) to communicate a non-significant change. The associated section of the exposition would then be amended in accordance with the cycle.

Situations may require operators to make an immediate change to procedures via an 'operational notice' to address a risk in a timely manner. To be suitable, the inspector should confirm that an operational notice forms part of the exposition.

Communication of changes to personnel

The operator should detail a method of notification of changes to the operator's personnel. The method should be such that the operator is sure that the communication is reaching the intended audience in a

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timely and effective manner. Some operators may rely on e-mail systems, while others may use a more formal system that records whether each individual has read and acknowledged the information. To be suitable, it should be clear how and when the change will be communicated.

3.4.3 Key personnel changes

The regulations provide a means for operators to enact changes to key personnel in certain circumstances, without having received CASA approval prior to implementation of the change. To be suitable, the person appointed must have been previously authorised to carry out the responsibilities of the position. This relief cannot be used for other significant changes. If an operator elects to set a policy requiring CASA approval for all significant changes prior to implementation, this is also considered suitable.

3.4.4 Risk assessment

The MOC process, and associated risk assessment process, are required to be integrated with the operator's SMS. Any assessment of the SMS aspects should be conducted with reference to <u>Protocol suite</u> (OPS.08) Safety management systems assessment and section 3.8 of this principle and OPS.142 worksheet.

3.5 Logs and records

3.5.1 Records of participation

The operator must have an appropriate system that maintains records of participation in Part 142 activities.

To be suitable, the inspector should determine that the operator's exposition describes the operation of this system and clearly defines the administrative processes involved in maintenance of the records and access to the data when required.

Templates of training and assessment forms and guidance to instructors and examiners for the correct completion of records of participation should be included in the exposition. If using forms provided by the contracting operator for contracted training and/or contracted checking activities, the exposition should describe how it will be ensured that instructors and examiners are competent in using the contracting operator's forms.

A record of a person's participation in a Part 142 activity must include a description and assessment of the person's performance. The record should be sufficiently comprehensive to enable assessment of competence against relevant standards.

A record of participation should detail:

- the participant's name and ARN
- activities conducted
- lesson number (if any)
- briefings completed
- certification, by an instructor, of achievement of competency in each element assessments and supporting evidence
- recommendations including remedial training (if any)
- flight/FSTD time
- student and instructor or examiner and participant sign-off
- student's ARN
- support pilot's (if any) name and ARN.

The operator's exposition must detail a process to ensure that records of participation are made within 21 days after the Part 142 activity is conducted.

Records of participation in Part 142 activities must be retained by the Part 142 operator for a period of at least 7 years.

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An exposition should include a process of internal audit to check for compliant operation of the record management process, and to verify the accuracy and completeness of records of participation.

Availability of records

The operator's exposition must detail a process to ensure that a record of participation in a Part 142 activity is made available, on request, to the person to whom the record relates.

The exposition must also detail a process for providing a copy of a record of participation in a Part 142 activity to another Part 142 operator, within seven days after receiving the request from the other operator.

The process for transfer of a record of participation to another Part 142 operator:

- should only respond to written requests from an authorised representative of the requesting operator (the request should be authenticated)
- may provide for date stamping of a request
- must ensure the transfer of a record is subject to the written authorisation from the person to whom the record relates
- should ensure the security and confidentiality of the records
- should ensure the original records are retained.

3.5.2 Flight-related documents

The operator's exposition must include procedures for maintaining and ensuring accessibility to the documents prescribed. A suitable method may be via hard copy or the use of electronic devices and will vary with the complexity and nature of the operation. The inspector should consider the following information when assessing suitability.

The exposition should list items of general documentation provided to flight crew to undertake their duties. The operator must also employ a system of management for these documents. The size and complexity of the operation will dictate the method. It may vary from a simple paper filing system to an electronic system with a dedicated information manager. The exposition should describe how information is distributed to crew.

The exposition should contain a statement that flight crew must follow mandatory procedures published or limitations in the aircraft flight manual (AFM), or FCOM that forms part of the exposition.

For the operation of rotorcraft where the avoid area of the HV envelope is not a limitation in the AFM the operator should have an operational policy covering how the risks of such operations are to be managed and minimised by their flight crew during, for example, confined area operations, winching or sling load operations and other operations where exposure to the avoid area is necessary during the activities.

The exposition must include instructions for the provision of aircraft checklists to the flight crew members. Depending on the size and complexity of the operation, this may vary from provision of hard copy documents and amendments through to the use of electronic devices whereby amendments are pushed to crew. For complex operations, the exposition should describe how the flight crew use the checklist and when.

The exposition may also include a statement that flight crew members are responsible for ensuring the presence of certain documents.

The exposition should include a procedure to ensure that each flight crew member carries both their medical certificate and licence with them on a flight.

3.6 Conduct and management of Part 142 activities

The exposition must contain procedures by which the operator conducts and manages the authorised Part 142 activities, including the supervision of instructors and persons participating in the activities.

The description should include information, procedures and instructions relating to the flight operations of all types of aircraft operated, to ensure the safe conduct of the activities. The extent of the material required is dependent on the number of types and complexity of each aircraft model operated.

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Management of Part 142 flight training and contracted training

If the operator conducts Part 142 flight training and/or contracted training, the procedures for managing the training activities should include:

- management of training records
- determination and provision of resources for completion of training
- scheduling of instructional personnel and resources
- instructional standardisation and supervision
- management of examinations and tests
- participant performance review
- management of flight training areas and low flying training areas
- establishment and maintenance of checklists
- use of electronic flight bags (if any)
- authorisation of pilot in command
- supervision of student pilot solo flight
- carriage of passengers.

Protocols for relationships and behaviour with course participants may be included.

Additional considerations for contracted training

Contracted training is training, other than initial qualification training, provided by an authorised Part 142 operator to the personnel of a contracting operator, to meet the contracting operator's flight crew member training obligations under the regulations, e.g., for recurrent training. The defined term *recurrent training* means the training of the personnel of an aircraft operator or the operator of an FSTD that is conducted to ensure that the personnel are competent to carry out their responsibilities.

Under Part 142, contracted training is not limited to multi-crew operations.

The exposition should nominate a person responsible for managing each course of contracted training.

The operator should provide for the timely acquisition of the contracting operator's relevant publications, such as the training and checking manual, standard operating procedures and aircraft flight manuals.

The operator should have a process to ensure compliance with the contracting operator's procedural manuals. The process should provide for the systematic review and subsequent awareness training, for contracted instructors, of the contracting operator's procedural manuals relevant to the contracted training.

Procedures should include a safety review of training areas at unfamiliar locations, prior to the conduct of contracted flight training.

The exposition may describe procedures for making agreements with contracting operators as to the scope, conditions and limitations of services to be contracted. The process should ensure that:

- each contract confirms that the head of flying operations of the contracting operator retains responsibility for the contracted training services
- if training requires operation of the contracting operator's aircraft, the Part 142 contracting personnel are inducted into the organisation of the contracting operator
- any arrangements for Part 142 personnel to have recency flying with the contracting operator, is reflected in the agreement.

Management of contracted checking

The procedures for the conduct and management of contracted checking may include the following:

provision for consultation with the contracting operator as to the operational terms and conditions
applicable to the checking

- a process for developing binding agreements with contracting operators, to ensure the scope, requirements, conditions, limitations and responsibilities for the services to be provided are clearly defined
- a means for ensuring each contract confirms that the chief pilot/head of flying operations of the contracting operator retains responsibility for contracted checking conducted to meet regulatory requirements
- if the checking requires operation of the contracting operator's aircraft, a process for ensuring the contract also provides for the induction of Part 142 contracted personnel into the organisation of the contracting operator. The operator may also include a means for ensuring the contract reflects any arrangements for Part 142 personnel to have recency flying (if required) with the contracting operator
- provision for access to CASA approvals of the contracting operator's tests and checks
- nomination of a person responsible for managing the checking for each contracting operator
- protocols for liaison with the contracting operator
- management responsibility for the conduct and management of contracted checking
- provision for examiner competency, including minimum qualifications and experience, recency and requalification
- induction of examiners into the practices and procedures of the contracting operator
- agreement with the contracting operator for proficiency checking standards
- assessment plans for each kind of checking (these should be developed in consultation with the contracting operator) - the plan should describe how and when the assessments will be conducted and recorded
- command responsibility for flights in aircraft under the control of the contracting operator
- recording and reporting requirements, including reporting to the Part 142 operator
- provision for safety reviews of training areas at unfamiliar locations, prior to the conduct of contracted checking.

Supervision of instructors and persons participating in activities

An operator's exposition must include procedures for the supervision of persons participating in Part 142 activities.

The exposition should describe the duties and responsibilities of Part 142 personnel for ensuring participants in activities are supervised to an extent necessary to avoid incidents and accidents.

Supervision of instructors

The performance of instructional activities must be closely supervised to ensure flight safety. The operator's policy and process for the appointment of supervisory personnel, as well as the scope and limitations of responsibility of each supervisory position, should be described in an exposition.

Approval of dual instructional flights

Policy for the approval of dual instructional flights should be described in the operator's exposition.

Dual instructional flights conducted in accordance with the course syllabus or course program may be deemed to have been approval by virtue of a published daily flight training program. Some activities such as helicopter touch down auto-rotations or low flying may require specific approval.

Supervision of student solo flight

An operator's exposition must describe a means for ensuring, in accordance with regulation 61.112 of CASR, that a person not holding a pilot licence (a student pilot) when authorised to pilot an aircraft in command, that the flight is approved and supervised by a flight instructor who is authorised for the purpose by the operator.

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The process must meet the minimum standard of supervision prescribed by subregulation 61.112(3), as follows:

- the instructor must provide guidance to the student pilot in relation to the flight
- during the flight, the instructor:
 - must be at the aerodrome of departure or flying within 15 nm of the departure aerodrome
 - can be contacted during the flight by radio or other electronic means.

The process should include provision for active monitoring of each solo flight by a flight instructor. As well as active monitoring, the supervising instructor should provide flight following, operational control and the rendering of assistance if necessary.

For solo circuit operations, the operator should ensure that a competent instructor is assigned to visually monitor circuit operations. The supervising instructor may be provided with two-way radio communication with circuit aircraft for the purpose of exercising operational control over solo flights, if necessary.

For training area and navigation solo flight operations, an operator should ensure that an instructor is assigned to monitor radio frequencies when possible, to provide assistance if necessary, and maintain a search and rescue watch.

3.6.1 Assignment of command responsibility

Part 142 flight training and/or contracted training

For other than sole occupant flights, the exposition should include a means for identifying and recording the name of the pilot in command of the aircraft. Any command responsibilities, in addition to those required under civil aviation law, may also be recorded.

The operator's policy for command responsibility should specify that during dual flight time, the flight instructor is the pilot in command, and that during flight tests or checks, the flight examiner is the pilot in command.

Contracted checking

The policy for assignment of command responsibility must not countermand the regulatory requirements but may include additional responsibilities imposed by the operator.

A means for obtaining agreement about command responsibility with prospective contracting operators should be included.

The process should specify a means of identifying and recording the name of the pilot in command of the aircraft and any command responsibilities that are in addition to those required under civil aviation law.

During flight tests or checks, the policy may specify that the flight examiner will be the pilot in command.

3.6.2 Compliance with contracting operator's procedures

If the operator conducts contracted training and/or contracted checking, a process to ensure that the contracted training and contracted checking activities are conducted in accordance with the contracting operator's exposition, training and checking manual and standard operating procedures, must be described in the Part 142 operator's exposition.

The process should include how the contracting operator's relevant publications are accessed (such as the training and checking manual, standard operating procedures and aircraft flight manuals), and for any changes to the contracting operator's relevant publications to be captured by the Part 142 operator.

The process should include provision for the systematic review of relevant manuals of the contracting operator to establish requirements, procedures and practices for the conduct of contracted training and checking. Awareness training for instructors and examiners in the practices and procedures of the contracting operator (as relevant to the contracted training and/or contracted checking) should be provided.

The procedures for conformance with contracting operator procedures should ensure that instructors and examiners are aware of the requirements of the contracting operator's SMS, including hazard identification and incident reporting processes.

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The operator's procedures should ensure that post-activity reviews of contracted training and contracted checking records are conducted, to confirm conformance with the contracting operator's requirements.

3.6.3 Flight training areas

Each flight training area used to conduct Part 142 activities must be described in the operator's exposition.

The description should identify established areas or describe the lateral and vertical boundaries, and the kind of flight training permitted in the area.

As well as including descriptions in an exposition, an operator should have a process for managing training areas.

The process should provide for the safe establishment, promulgation and review of each flight training area, with an emphasis placed on ensuring that information about flight training areas is disseminated to all relevant personnel.

An operator should demonstrate that they have considered the following in the establishment of a flight training area:

- the location and size of the area compared to the type of training and the maximum number of aircraft planned to use the area
- minimum utilisation of airspace over populous or sensitive areas.

Training areas should be depicted on a 1:100,000 or larger scale topographical map prominently displayed in the training facility. Noise sensitive areas, obstacles such as towers and powerlines and proximity to controlled airspace, should be clearly marked.

The boundaries of a day VFR training area should be readily identifiable by prominent landmarks, rather than distances from the departure aerodrome such as DME arcs.

When a training area does not include the departure aerodrome, entry and exit paths to the training area should be identified.

The management process should include procedures for a safety review of training areas at unfamiliar locations, prior to the conduct of flight training - including contracted training.

3.6.4 Low flying training areas

An operator must have a process for determining suitable low flying training areas required for activities in relation to a flight crew licence or rating that require low flying.

The process should provide for the safe establishment, promulgation and review of each low flying training area.

An area proposed for low flying training should be subject to an inflight assessment conducted from a safe height above obstacles.

The proposed area should free from high-risk obstacles (such as power lines or cables) and should not be located over livestock.

The review process should include regular aerial inspections of low flying areas, to monitor obstacles and hazards.

Management positions responsible for the process should be included in the description.

An operator must have a means to ensure that low flying training is conducted only over a flight training area approved by CASA, if required.

3.6.5 Causing or simulating failures etc.

Division 91.D.11 of Part 91 prescribes requirements for in-aircraft activities involving the causing or simulating of instrument and engine failures, the simulation of IMC, and initiating autorotation of the main rotor system in rotorcraft.

The exposition must include any restrictions, specifications or precautions relating to the simulation of instrument meteorological conditions and the causing or simulation of failures in aircraft that are applicable to the Part 142 activities. These may relate to aircraft system shutdown, the simulation of emergency and

abnormal conditions in an aircraft, and limitations on weather and environment. Division 91.D.11 requirements must be taken into account.

Examples of instructions included in the exposition may be:

- the means of simulating IMC to ensure the instructor or examiner maintains adequate vision forward and to each side of the aircraft
- instructors or examiners must ensure that the visual component of an instrument approach, when flown in an aircraft in VMC, conforms to the published circuit direction
- only emergency and abnormal systems failures listed in the aircraft pilot operating handbook, quick reference handbook, minimum equipment list, flight crew operating manual (or however described), are to be simulated
- instructors or examiners must not trip circuit breakers as a means of introducing systems/component failure, unless specifically permitted in the aircraft flight manual
- the required safety margins for simulation of engine failure (e.g. the minimum height above ground level and minimum airspeed for the simulation of an engine failure in a multi-engine aeroplane)
- limitations and conditions for practising touchdown autorotation landings in a helicopter
- instructors or examiners must not introduce simultaneous multiple unrelated simulated emergency or abnormal situations during flight
- after a simulated failure in an aircraft, instructors or examiners must ensure the aircraft is configured back to a normal operating mode before another simulated failure may be introduced except where the simulated failures are linked (e.g., electrical failure leading to a loss of aircraft attitude information).

Subregulations 91.725(1), (2) and (4) specify limitations relating to the carriage of persons during training flights. An exposition must contain a section describing the persons permitted to be on board.

3.6.6 Instructors and examiners

3.6.6.1 Instructors and examiners must be authorised under Part 61

The operator must develop a process to ensure that before conducting a Part 142 activity for the operator, all instructors and examiners are appropriately authorised under Part 61. This includes all applicable qualification, recency and competency requirements. The process must be detailed in the operator's exposition.

Depending on the size, scope and complexity of the operation, this may be as simple as a manual tracking tool such as a white board detailing each instructor and examiner's qualification, through to an automated software-based rostering system and qualification tracking system that ensures instructors and examiners are authorised under Part 61.

For a manual tracking system to be suitable, the inspector should consider the number of instructors and examiners employed and the number of different activities conducted. The inspector should consider a total of 10 instructors and/or examiners across a simple operation not involving multiple approvals as suitable for a manual tracking tool.

In the case of complex operators with more than 10 instructors and/or examiners or multiple types, there are a number of software programs designed to manage flight crew rostering available on the market. To be considered suitable the inspector should ensure the software is:

- tailored to the operator's requirements
- able to flag an instructor or examiner approaching and/or exceeding a defined qualification or recency requirement
- able to prevent an unqualified instructor or examiner being rostered for a duty.

3.6.6.2 Access to records

The operator's exposition must detail procedures for ensuring instructors and examiners have access to the records of course participants, prior to conducting a Part 142 activity.

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The procedures should ensure the security and confidentiality of the records.

3.6.6.3 Competency of instructors and examiners using FSTD

If conducting activities in an FSTD, the operator's exposition must detail a process for ensuring instructors and examiners have been assessed as competent to conduct the activity in the device before conducting the activity.

Note: Paragraph 142.315(j) requires the operator's internal training and checking system to include procedures to ensure an instructor is competent to use an FSTD. The requirement under regulation 142.240(1) is applicable to both instructors and examiners.

The operator's process should ensure simulator instructors and examiners are not rostered for Part 142 activities in an FSTD unless assessed as competent for the activity. Common industry practice is to employ a software recording/alerting program for renewable qualifications, recency and other regulatory requirements, as part of the crew rostering process.

The inspector will need to ensure that the operator's internal training and checking system is suitable to ensure that instructors and examiners are qualified and competent to conduct activities in the FSTD.

3.6.6.4 Flight test recommendation

When a participant is required to demonstrate a required level of skill, the exposition should include a process for planning and conducting the assessment.

The process must describe procedures for ensuring a person recommended for a flight test meets the flight test prerequisites provided under regulation 61.235.

The procedures may provide for an initial check of the prerequisites, by a flight instructor, before final verification and certification.

The head of operations, or another person named in the exposition, must certify that an applicant for a licence (other than ATPL) or a rating has met the prescribed eligibility requirements.

The process may include a checklist of prerequisites with provision for verification and certification.

3.6.7 Authorisation of pilot in command and carriage of passengers

3.6.7.1 Pilot in command - authorisation under Part 61

The operator's exposition must describe a process to ensure that persons flying an aircraft as pilot in command in the conduct of Part 142 activities are appropriately authorised under Part 61 to do so.

The requirement should initially be addressed during the activity planning process, however the ultimate responsibility for compliance should be met by the operator's processes for crew scheduling and flight authorisation/approval procedures.

3.6.7.2 Carriage of passengers

The operator's exposition must include procedures or instructions to ensure passengers are carried only when permitted by the regulations.

Abnormal operations or low flying activity

Subregulation 142.370(1) prohibits the carriage of passengers during Part 142 activities in aircraft that involve:

- a simulated engine or system failure that affects aircraft performance or handling characteristics
- low flying.

3.6.7.3 Authorisation of pilot in command to carry passengers

Subregulations 91.725(1), (2) and (4) specify the limitations for conducting training activities in the aeroplane.

The exposition must include a procedure to ensure passengers are only carried in aircraft conducting Part 142 activities if the pilot in command is authorised under Part 61 to fly the aircraft as pilot in command with a passenger on board. This requirement may be applicable in circumstances when the holder of an RPL, who is participating in integrated licence training, may seek to carry more than one passenger.

The operator's exposition must also detail a procedure to ensure passengers are not carried during student pilot operations, including dual training flights. Subregulation 61.113(2) of CASR provides that a student pilot is not authorised to pilot an aircraft carrying passengers. 'Pilot' means 'to manipulate the flight controls of an aircraft during flight' or 'to occupy a flight control seat in an aircraft in flight'.

3.6.8 Part 142 flight training and contracted training

3.6.8.1 Training plans and syllabuses

For Part 142 training or contracted training, the operator must include the training plans and syllabuses for the training. Besides verification of the presence of such material, CASA must conduct a qualitative assessment of it. To assess the suitability of training plans and syllabuses, see section 3.6 of this principle.

Training plans

Training plans for Part 142 flight training and contracted training conducted by the operator must be included in the exposition.

Training must be planned to ensure it addresses each of the competency standards mentioned in the Part 61 MOS for the licence, rating or endorsement.

The planned total flight time for each course must not be less than any minimum specified in Part 61 for the licence, rating or endorsement.

A training plan should describe:

- the authorisation to be gained
- the standards which must be met
- the strategies for the conduct of training to meet the required standards in a structured and systematic manner
- the planned sequence for the delivery of the training
- for integrated training courses, how aeronautical knowledge and practical flight training will be coordinated, to ensure that the delivery of knowledge training is timed to optimise flight training
- how and when the competency of participants will be assessed against the standards, and who will conduct the assessments
- the means for recording and retaining a record of training and assessment
- any contingencies to allow for adjustment to the training plan (how events such as unexpected weather or operational restrictions are to be managed, and the scope for amendments to the training plan in these situations).

An operator may also specify in a training plan:

- course participant prerequisites
- the expected course timeframe
- how, when and where the training will be conducted
- who will deliver the training
- how training and assessment will be supported (for example, training aids and materials, resources, facilities and supervision arrangements)

- the minimum qualifications and experience for instructional personnel and examiners conducting the course
- how deficiencies in training outcomes will be identified and addressed
- any additional information required to ensure successful training delivery.

A training plan may include a planning matrix which sets out the competency standards and displays their integration into the training course.

A training plan may include a list of lessons and periods in chronological order to form a 'program of instruction' for the course.

The facilities to be used for all training activities must be described in an exposition. As specification of resources required to conduct a course should be determined during the planning process, a description of course facilities and equipment may be included in the training plan.

The level of detail for the facilities should be sufficient to identify items essential to the conduct of each course - these may include briefing rooms (air conditioned and free of noise distraction), briefing aids, a flight preparation office with internet access, amenities, aircraft/simulators and operational publications etc.

For a course participant having prior knowledge and existing skills, an operator should describe in their exposition the arrangements for the recognition of current competencies (also referred to as recognition of prior learning). The description should include who is responsible for making the assessment and preparing a training plan tailored to the specific needs of the course participant.

A training plan may make reference to information or procedures, contained within an exposition, which are common to each kind of flight training or contracted training, rather than duplicate information across several training plans.

The operator should demonstrate the capability for preparing training plans via a plan preparation process. A process for developing training plans should address:

- personnel responsible for the preparation
- course development responsibilities
- regulatory requirements for the qualification
- participant demographic, prior learning and training needs analysis
- identification of flight crew licensing competency standards and aeronautical knowledge standards which must be included in the course
- the selection and allocation of resources required for the delivery of the course
- the selection of course phases and objectives
- the allocation of training lessons and periods to address the prescribed flight standards and aeronautical knowledge standards (the planned rate of delivery and course progression should be set to accommodate a student capable of an average rate of progression)
- modes of delivery and training techniques (e.g. individual, group, self-paced, aircraft or FSTD, lectures, guided group discussion, supervised practise)
- sequencing of theory and practical training periods
- the production of training material which is available to the student
- the progressive review and assessment of competency
- the remedial training policy
- the methods for validation of the plan.

The operator should ensure that personnel appointed to develop the training plans for each course, have appropriate expertise in flight instruction, course design and management.

Syllabuses

For each kind of Part 142 flight training or contracted training that is or is proposed to be an authorised Part 142 activity for the operator, the training management system must include a detailed syllabus. Syllabuses must be included in the exposition.

Each flight training syllabus must:

- be competency-based
- cover each of the competency standards mentioned in the Part 61 MOS for the authorisation (as summarised in Schedule 1 of the Part 61 MOS)
- progressively incorporate performance criteria and underpinning knowledge into a structured lesson format
- provide lesson plans of sufficient detail to ensure instructional personnel can provide a consistent training outcome
- clearly set out the integration of aeronautical knowledge and flight training (for integrated courses and other courses when the operator will provide both aeronautical knowledge and practical flight training)
- be supported by documentation to enable the accurate and valid recording of a participant's progress against the required standards
- provide for the assessment of a participant's competency against each of the performance criteria to a standard suitable for the issue of the licence, rating or endorsement, on a minimum of two occasions (i.e., on two separate flights)
- detail the standards to be met during assessment
- meet at least the minimum standards and experience specified in Part 61 for the licence, rating or endorsement.

When incorporating the required competency standards into a syllabus, the requirements of paragraphs 8.5 and 10.5 in the introduction to the Part 61 MOS are relevant. Consequently, the following must be detailed in the syllabus:

- each element and performance criterion contained within the units of competency (Part 61 MOS Schedule 2)
- the underpinning knowledge applicable to each unit of competency (Part 61 MOS Schedule 2)
- the means of assessing flight performance as being within the tolerances mentioned in Schedule 8 of the Part 61 MOS
- the aeronautical knowledge standards contained within each applicable unit of knowledge (Part 61 MOS Schedule 3).

The following must be considered and may be referenced in the syllabus:

- the division of the course into phases as necessary, for example due to the size of the course or the intermediate milestones to be achieved
- the number of lessons required to successfully incorporate the competency standards into the course
- the sequencing of lessons to ensure the logical development of knowledge and skills
- the assessment of competency during the course, and at course milestones and completion
- the range of variables contained within each unit of competency (Part 61 MOS Schedule 2).

Syllabus documentation may also contain:

- objectives and learning outcomes in addition to those specified in the Part 61 MOS
- techniques and other operator specific information relevant to particular flight lessons
- a program summary, to display the course structure and content at a glance.

The structure and content of the syllabus lesson plans and supporting training records should allow instructional personnel and examiners to readily:

- ascertain the progress of a course participant
- identify underachieving performance and access remedial training recommendations
- determine which competency standards have and have not been met.

When relevant to the training course, syllabus lesson plans must allow for the assessment of a student pilot's competency prior to conducting first solo flights in the circuit, training area, cross country and at night.

Underpinning knowledge is normally provided by instructional personnel during flight training and associated briefings. For each practical flight lesson, a syllabus should ensure that the requisite underpinning knowledge has been delivered prior to the flight.

For each aeronautical knowledge lesson, a syllabus should list the knowledge standards as specified in the training plan, together with related topics and specific content described in the Part 61 MOS.

Each flight training lesson should include time allocated for:

- flight training briefings, including underpinning knowledge
- pre-flight briefing
- flight lesson
- debriefing

An exposition should describe a process for the preparation of course syllabuses.

The process for the preparation of course syllabuses may include the:

- personnel responsible and their responsibilities
- regulatory requirements for the qualification
- review of the training plan
- allocation of performance criteria to each lesson identified in the training plan
- preparation of lesson plans
- preparation of training and assessment records
- validation of the course to ensure it meets each of the Part 61 MOS competency standards that are required to be met to gain the licence, rating or endorsement.

Assessment of competency

Competency-based training includes the assessment of competency.

Evidence of competency should reflect task skills, management skills, contingency skills and the ability to apply skills and knowledge in new circumstances.

Assessment of competency is made by obtaining and measuring evidence of an individual's competency against the standards required by the Part 61 MOS for the licence, rating or endorsement.

Assessment of competency against practical flight standards

For assessment against the practical flight standards - the competency required by each unit of competency mentioned in Schedule 2 of the Part 61 MOS is the ability of the course participant to perform each of the elements of the unit:

- according to the performance criteria mentioned for the element
- within the range of variables mentioned in the unit of competency
- during practical flight within the flight tolerances mentioned in the table in section 1 of MOS schedule 8.

To be deemed competent, a course participant must demonstrate the consistent application of knowledge and skill to the standard of performance that is required.

To ensure this, a minimum of two assessments against each performance criterion must be taken into account during course planning and incorporated into individual lesson plans. The ability of a course

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participant to successfully perform the requirements of each performance criterion on a single occasion is not an acceptable indication of competency.

Note: Competency against performance criteria must be demonstrated on at least two separate flights.

Assessment against the practical flight standards also requires assessment of underpinning knowledge. For each unit of competency mentioned in Schedule 2 of the Part 61 MOS, course participants must demonstrate their understanding of the underpinning knowledge mentioned in the unit, and their ability to apply this knowledge to practical situations.

Assessment of underpinning knowledge will not necessarily be covered by licence or rating examinations, and therefore allowance must be made within each syllabus for its assessment. This may be via such means as oral questioning, short-answer tests/quizzes, and observation of the application of the knowledge being applied to practical situations.

Evidence of competency in flying skills may be obtained through the recorded observation of instructors and examiners during flight training and testing. The operator must provide an auditable system for maintaining records of training and assessment.

Assessment of competency should provide for formative (continuous) assessment, and for summative (periodic) assessment at predetermined milestones such as phase or course completion. The formative and summative assessments to be conducted during a course of training should be documented in the training plan and clearly set out in syllabus lesson plans.

Formative assessment is used to monitor and gauge the learning progress during instruction, and to determine whether to move on to new activities or to repeat training exercises. Formative assessments are made by an instructor on almost every flight, via the direct observation of a course participant's performance. They provide continuous feedback to both the course participant and the instructor concerning either learning success or failure to meet the required standards.

Each syllabus should be planned to ensure formative assessments are made consistently as a participant progresses through the training course.

Summative assessments of both skill and knowledge should be conducted at the conclusion of course phases or at the end of a course of training. These assessments are used to determine whether the instructional objectives (the Part 61 MOS competency standards) for the licence, rating or endorsement have been achieved.

Each course syllabus must provide for the conduct of sufficient summative assessments. Assessment of competency against each performance criterion required for the particular licence, rating or endorsement must be made on a minimum of two occasions over two separate flights. Examples of summative assessments during flight training are those conducted by an authorised instructor during a pre-solo or pre-licence check flight. A flight test is also an example of a summative assessment.

When relevant to the training course, an assessment of a student pilot's competency prior to conducting first solo flights in the circuit, in the training area, cross country and at night must be made. Pre solo assessments must include assessment of competency in skill, knowledge and the general standard for proficiency in the English language.

The exposition should provide policy and procedure for the conduct of summative assessments (including flight tests and knowledge examinations).

Guidance to instructors and examiners should be provided in the exposition to ensure correct implementation of the assessment plan.

Course documentation and training records must allow easy recognition by instructional personnel of the standards against which a course participant has been assessed as competent.

As assessment planning is an integral part of the development of a training course, a process for ensuring that sufficient assessments are incorporated into each course should be described in the exposition.

The process for planning assessments should address:

- · personnel responsible and their responsibilities
- regulatory requirements for the qualification

- identification of the required competency standards
- formative assessment policy and practice
- summative assessment policy and practice (including compliance with regulation 142.385, in relation to assessment of competency for certain solo flights)
- record keeping
- planning validation.

Aeronautical knowledge examinations

Assessment of competency against the Part 61 MOS aeronautical knowledge standards is made via the examinations set out in Schedule 4 of the MOS, and any other written examinations, oral questioning and reviews as determined by the operator.

Under subregulation 61.215(1), a Part 142 operator may set aeronautical examinations for a recreational pilot licence, a flight crew rating other than an instrument rating, or a flight crew endorsement, provided the operator holds an approval under regulation 61.040 and the exam is set in accordance with the relevant knowledge standards mentioned in Schedule 3 of the Part 61 MOS. The operator should describe, in its exposition, a procedure for periodic review of content to confirm it remains relevant to the activities and reflects changes in legislation.

The Flight crew licensing manual provides policy and guidelines for the approval under CASR 61.040 of operators wishing to set these exams. See section 15.6 of the Flight crew licensing manual.

For aeronautical examinations set and administered by the operator which are not covered under subregulations 61.215(2)&(3), the operator should take steps to minimise the chance of examinees predicting the questions through collusion or other means. For example, the operator may prepare 3 unique examination papers for each examination type.

Examples of such examinations are :

- first solo
- first area solo
- type specific aircraft knowledge.

Integrated training courses

Part 61 provides reduced aeronautical experience requirements for the PPL and CPL when gained under an integrated training course.

Integrated training is defined as an intensive course of training:

- that is designed to ensure that a course participant receives ground theory training integrated with practical flight training; and
- for which:
 - the ground theory and practical flight training are conducted by the same operator; or
 - the operator that conducts the practical flight training engages another person or organisation to conduct the ground theory training on behalf of the operator; and
- that is conducted according to a syllabus that satisfies the knowledge and flight standards specified in the Part 61 Manual of Standards for the grant of a private or commercial pilot licence; and
- that is designed to be completed within a condensed period.

The exposition must describe how the operator will integrate the training to meet the requirements Part 61. The operator must demonstrate that theory and flight training will be conducted in accordance with a syllabus addressing both the aeronautical standards and the practical flight standards specified in the Part 61 MOS. The method of integration should be evident within the training plan and detailed within the syllabus.

The delivery of theory training should be timed to optimise flight training. The operator should demonstrate that sufficient underpinning knowledge is provided so that during a flight lesson the student is able to

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understand what is happening and why. A flight training lesson should not commence until relevant underpinning knowledge has been provided.

The operator's training plan should demonstrate that consideration has been given to dividing courses into logical phases, separated by course milestones.

Examples of phases may be:

- general flying phase
- navigation phase
- advanced navigation phase
- instrument flight phase.

Examples of milestones are:

- first solo flight, navigation progress test and private pilot licence flight test
- CPL aeronautical knowledge examinations
- a check conducted prior to a flight test.

The operator should include policy to protect the integrity of integrated courses, by controlling extensions or interruptions to training and managing student absences. Significant breaks to training may require recommencement or remedial training.

An operator may elect to have aeronautical knowledge training conducted by a third-party provider. In this situation the operator retains responsibility for ensuring integration is achieved in accordance with the training plan.

To optimise integration, the proposed courses would normally be conducted on a full-time basis.

The operator should provide details of the method of theory delivery (such as face-to-face, online modules, or tutorials). The effectiveness of the delivery methods in meeting the integration objectives should be assessed.

The means by which the operator delivers and assesses both the practical flight training and its associated underpinning knowledge (such as computer-based learning systems, briefings, FSTDs and aircraft) must be detailed in the training management system and syllabus. The syllabus and training plan must be structured to be able to meet the stated integration objectives.

CASA's sample syllabus material

For operators that have utilised CASA's sample syllabuses, the inspector shall conduct an assessment by sampling elements that are most relevant or safety critical for each qualification (e.g. C4.2 Manage fuel system and A4 Land Aeroplane for the commercial pilot licence) and then evaluating compliance with the training requirements. If errors are identified, further sampling should take place. Additionally, the inspector must ensure that the requirements of Part 61 for the granting of the authorisations are met, e.g. mandatory hours.

If relevant, the operator should describe a transitional process within the exposition as to how existing students that are managed by an extant syllabus will transition to any newly constructed flight training syllabus.

The sample syllabuses may be useful to the assessor as examples of a means of compliance. Consider, for example, a syllabus in the context of its pre-solo training and assessment characteristics. Regulation 142.386 requires that an operator assesses a trainee as competent to conduct solo flight but does not specify the competencies. Therefore, the inspector can use the pre-solo competencies described in the equivalent sample syllabus as a basis for comparison. Submissions that do not require these basic pre-solo competencies should be referred to the operator for further explanation.

3.6.8.2 Checklists

Aircraft operating checklists applicable to training, and instructions and circumstances for use, must be described in the exposition.

For contracted training, the operator should ensure that instructors are provided with prior access to aircraft flight check systems required to be used by the contracting operator.

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The checklist will be aircraft specific and must include all the items in the AFM and may also include operator specific requirements. Original Equipment Manufacturer (OEM) checklists may be in the form of a quick reference handbook (QRH) or part of the pilot operating handbook (POH). Some OEMs will provide 'expanded checklists' with additional detail explaining each checklist item. To be suitable the checklist must be easy to use and for multicrew operations define who completes the action. Checklists normally consist of:

- normal operations
- emergency operations
- abnormal operations.

Note: AFM/POH for smaller aircraft may not address abnormal procedures. In this case the normal and emergency procedures are required to be included in the checklist.

Checklists should be regularly reviewed against AFM or supplements and any changes made IAW the operator's management of change process.

Operators should include procedures for maintaining and ensuring accessibility to checklists. A suitable method may be via hard copy or the use of electronic devices and will vary with the complexity and nature of the operation. The exposition may also include a statement that flight crew share mutual responsibility for ensuring the presence of certain documents.

3.6.8.3 Training management system

For its Part 142 flight training and/or contracted training, the operator must have a training management system that meets the requirements of regulation 142.255. The system may be used for the scheduling, recording, reporting and monitoring of training, and may be a software application.

Course outline

For each kind of flight training or contracted training that is an authorised Part 142 activity for the operator, the training management system must include a course outline.

A course outline may include:

- an overview of the course
- · course objectives and outcomes
- a course program, indicating the sequence of theory and flight training, progress assessments, examinations and tests
- participant pre-requisites (e.g. minimum age, education or aptitude)
- course commencement
- training delivery methods
- assessment criteria and methods.

Detailed syllabus

To assess the suitability of the operator's syllabuses, see section 3.6.8.1 of this principle.

Standards to be met

For each kind of Part 142 flight training or contracted training that is an authorised Part 142 activity for the operator, the training management system must detail the standards to be met.

The standards to be met must at least meet the minimum standards and experience specified in Part 61 for the licence, rating or endorsement.

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Record forms

The operator's training management system must include record forms for each kind of Part 142 flight training or contracted training it conducts.

A training record must include a description and assessment of the person's performance. The record should include any areas of weakness and be sufficiently comprehensive with enough information to enable other instructors to efficiently continue the training.

Training records should certify end of phase competence and suitability for progression to the next phase.

See section 3.5.1 of this principle for further detail on records of participation and recommended content.

Procedures when a standard is not met

The operator's training management system must include procedures to be followed when a standard is not met during training.

The procedures should ensure that when conducting an assessment, an examiner or instructor records the details of which competencies have not been demonstrated and provide recommendations for further training.

The exposition should include a process for remedial training to address deficiencies identified in an assessment report.

The procedures should ensure that further assessment may only be made on recommendation by a senior instructor, when the retraining plan has been completed.

The retraining plan and records should be included in the participant's training file.

Provision should also be made for re-examination in accordance with any knowledge deficiency report resulting from a CASA aeronautical knowledge examination which is administered by the operator. A means to control the re-examination process should be detailed in the exposition.

Auditable system for maintaining records

The operator must have an auditable system for maintaining records of the results of the flight training or contracted training activities it conducts, constructed so the operator can conduct auditing of the records for quality assurance purposes. The system may be designed so a third party can similarly conduct an audit of the records.

3.6.8.4 Transfer of student from another Part 142 operator - integrated training

Regulation 142.380 provides for the transfer from another Part 142 operator of persons participating in integrated training courses. The provision only applies to prior training received while participating in an integrated course conducted by an authorised Part 142 operator.

The operator's exposition must describe a procedure to ensure that before continuing to provide any part of a course to a person, the operator has determined:

- the parts of the course the person has completed with the previous Part 142 operator/s
- the parts of the course the person needs to complete to ensure that all applicable standards of the Part 61 MOS are satisfied.

The procedures for managing the transfer of students from another Part 142 operator should provide for:

- obtaining training records from previous training organisations
- analysis of student logbook and calculation of aeronautical experience
- analysis of previous training records to determine completed training
- acceptance of units/elements certified as competent by a previous operator
- non acceptance of partially completed units of knowledge
- restructuring of a syllabus to accommodate a previous syllabus that is incompatible with the current operator's syllabus

- flight checking to establish areas of competency
- checking currency of results of CASA examinations.

3.6.8.5 Requirements for certain solo flights - student pilots

For the purposes of the CASR, the term 'student pilot' refers to persons who are receiving flight training prior to holding a pilot licence.

The operator must include a procedures in their exposition to ensure the completion of training and assessment of competency of student pilots before flying solo for the first time in the circuit, training area, cross country or at night.

The procedures should include:

- a statement of relevant responsibilities and accountabilities
- a means of confirming the solo pilot has an ARN
- methods to verify completion of prescribed training for the solo flight
- standards and methods for assessing competence of the student pilot to conduct the solo flight
- sufficient guidance and instruction to ensure valid assessments of competency are made and recorded
- assessment and certification that the student pilot is capable of conducting the solo flight safely
- a means of ensuring a student pilot meets the general English language proficiency standard, or has completed an approved course of training in English language proficiency
- instructions for approval of solo flight
- a means to ensure that flights are only conducted under the VFR and in accordance with the instructor's approval
- instructions for pre-flight briefing of solo pilots
- · that the briefing includes the terms and conditions of the approval of the solo flight
- provision for the solo pilot to acknowledge the terms and conditions of the approval (e.g. by countersigning the document)
- record keeping.

3.6.8.6 Requirements for first solo flights at night - other than student pilots

The operator's exposition must also describe a process for securing compliance with the requirements of regulation 142.385 (completion of training and assessment of competency for certain solo flights) in relation to course participants other than student pilots, when receiving training for a rating or endorsement and conducting a solo flight at night for the first time (e.g., the holder of a commercial pilot licence receiving training for the grant of a night VFR rating).

The process must also ensure compliance with regulation 142.386 (appropriate briefing and capability to conduct certain solo flights etc), in relation to the conduct of any solo flight for the first time.

The process employed by the operator should include:

- a statement of responsibilities and accountabilities
- a means of confirming the solo pilot has an ARN
- · methods to verify completion of prescribed training for the solo flight
- standards and methods for assessing competence of the pilot to conduct the solo flight
- assessors should be provided with sufficient guidance and instruction to ensure valid assessments are made and recorded
- assessment and certification that the pilot is capable of conducting the solo flight safely
- instructions for approval of solo flight

- a means to ensure that flights are only conducted under the VFR and in accordance with the instructor's approval
- instructions for pre-flight briefing of solo pilots
- the briefing should include the terms and conditions of the approval of the solo flight
- provision for the solo pilot to acknowledge the terms and conditions of the approval (e.g. by countersigning the document)
- record keeping.

Instructions for approval of solo flights

The operator's instructions for the approval of solo flight should ensure that, before giving approval for a solo flight, the responsible flight instructor is satisfied that:

- the solo pilot holds and carries a class 1 or 2 medical certificate or exemption
- the solo pilot is medically fit to conduct the flight •
- the student has passed the relevant pre-solo examination •
- the training objectives of the flight and the limitations on the conduct of the flight, have been provided orally and (preferably) in writing to the solo pilot, and entered by the instructor in the designated parts of the flight training record
- training records indicate the solo pilot has completed training for the flight, as specified in the operator's Part 142 exposition, and has been assessed and certified as competent by a flight instructor to conduct the flight
- recent experience requirements as required by regulation 61.115 of CASR have been met
- actual and forecast weather conditions are suitable
- the aircraft is serviceable, and fuel state is appropriate. •

The approval of a solo flight, including terms and conditions, must be discussed with the solo pilot during the pre-flight briefing, and authenticated on the training record by the signature of the responsible instructor.

Provision should be made for the solo pilot to acknowledge the terms and conditions of the approval (e.g. by countersigning the document).

3.6.9 Aircraft

If the operator is the registered operator of the aircraft, the exposition will need to include their process for managing continuing airworthiness. Refer to Protocol suite Protocol suite (OPS.13) Managing continuing airworthiness for more information.

If not the registered operator of the aircraft, the exposition needs to include procedures to ensure the aircraft is airworthy for flight. The Part 141 SOM includes procedures for both scenarios.

The operator's exposition must describe the kind and registration mark for each registered aircraft flown into, out of, or outside Australian territory. If the aircraft are flown solely within Australian territory, the kind and registration mark is not required.

The exposition must provide the kind of aircraft, nationality and registration mark for each foreign registered aircraft.

3.6.9.1 **Turbine-engined aircraft - leasing arrangements**

A description of any leasing or other arrangements for the supply of any turbine-engined aircraft must be included in an operator's exposition, to assist CASA to make a determination as to whether the arrangement will compromise operational safety.

The description of the arrangements for the supply of any turbine-engined aircraft should provide the basic details of any leasing agreement, financing arrangement or describe whether the aircraft is supplied by a third party. If supplied by a third party, that party should be identified.

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Aircraft leasing can be arranged in many ways, which may result in varied and complex safety situations, particularly if an aircraft registered in another contracting state is to be operated in Australia by an Australian operator.

The review of an aircraft lease may identify any conditions, limitations or penalties that could be detrimental to the safe operation of a particular aircraft. A copy of any applicable aircraft lease may be requested from the operator, if considered necessary. The arrangements for the operational control of the leased aircraft, aircraft maintenance and ensuring continuing airworthiness should be assessed.

Use Protocol suite (OPS.24) Aircraft leasing arrangements.

3.6.9.2 Turbine-engined aircraft - management, maintenance and continuing airworthiness

The operator's exposition must include a description of how it will manage, maintain and assure the continuing airworthiness of any turbine-engined aircraft, and who is responsible for this.

The description should indicate whether maintenance of the aircraft is required under an approved system of maintenance (class A aircraft) or a maintenance schedule (class B aircraft).

If a maintenance schedule (class B aircraft) is applicable, the exposition should also indicate whether the schedule is the manufacturer's schedule or the CASA maintenance schedule for the aircraft.

If the aircraft is used for Part 142 activities and is also authorised to operate under an AOC for the conduct of scheduled air transport operations, the exposition should state that the aircraft is subject to the continuing airworthiness requirements of CASR Part 42.

Operators not required to manage continuing airworthiness under Part 42 of CASR must meet the requirements of Part 4, Part 4A and Part 4B of the Civil Aviation Regulations 1988 (CAR).

Refer to Protocol suite (OPS.13) Managing continuing airworthiness for more information.

3.6.9.3 Foreign registered aircraft

The operator must describe its procedure for ensuring that any foreign registered aircraft is not operated in Australian territory for in excess of 90 days within a 12-month period. The description should include who is responsible and how the operation of the aircraft will be monitored and documented.

A 90-day period under subregulation 142.395(1) refers to 90 days in total, rather than 90 consecutive days.

If an operator holds an approval under regulation 142.040 to operate a foreign registered aircraft in excess of 90 days, the operator's exposition should include a procedure to ensure compliance with any such approval.

For CASA to issue an approval under regulation 142.395(2)(b) for the operator to use a foreign registered aircraft for greater than 90 days, the operator must explain how such an approval will maintain an equivalent level of safety required by subregulation 142.395(2)(a).

If the operator is considering a long-term use of the aircraft, that is, not related to seasonal activities, before considering an application for approval the inspector should confirm that the operator is unable to either:

- place the foreign registered aircraft or aircraft on the Australian Part 47 register, thus placing the airworthiness of the aircraft under solely Australian oversight
- arrange for Australia and the State of registry to enter into an article 83 bis agreement whereby Australia
 and the State of registry would agree to transfer regulatory responsibility to ensure the safe operation
 and maintenance of the aircraft, for example by agreeing to treat the aircraft as if it were an Australian
 aircraft. Please note there may be a significant lead in time for such an agreement to be entered into.

For operations that require a 142.040 approval, such an approval should only be issued on the basis of an agreement between CASA and the state of registry that sets out the areas of responsibility of the parties in relation to the supervision of flight operations, maintenance and airworthiness of the aircraft. The 142.040 approval and the agreement between the state of registration should expire at the same time.

Airworthiness

To ensure the operator maintains each foreign registered aircraft in accordance with the foreign country's laws, to be suitable the exposition must include:

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- a system that manages the maintenance and continuing airworthiness applicable to the laws of the foreign country in which the aircraft is registered
- appoint a maintenance controller to control the maintenance of the aircraft
- how scheduled and unscheduled maintenance will be controlled
- where the maintenance will be carried out
- how compliance with the airworthiness requirements of the foreign country will be complied with, including any airworthiness directives and service bulletins.

Refer to Protocol suite (OPS.13) Managing continuing airworthiness for more information.

Equipment requirements

The inspector will need to confirm that the foreign registered aircraft meets the minimum equipment requirements under Subpart 91.K and Chapter 26 of the Part 91 MOS. To be suitable the inspector must confirm that the equipment required to be fitted to, or carried on, the aircraft must have been approved by the NAA of the aircraft's State of registry.

In some cases, a foreign NAA may not permit certain types of equipment on an aircraft that are required under the Australian regulations. In this case the operator will need to ensure that the required equipment is fitted to or carried on the aircraft prior to flight operations in Australia.

3.6.10 Flight simulation training devices

Each of the operator's FSTDs must be qualified or approved, as prescribed by the legislation relevant to the device. The operator must provide information within its exposition in relation to the way it will ensure the devices are approved or qualified under the applicable legislation.

The operator's exposition must also include a description of each FSTD, together with the purpose (as described in Part 61 of CASR) for which each device will be used.

Description of devices

The operator's description of its devices should include:

- the manufacturer's name and the model of each device, or the aircraft type the device has been built to simulate
- the category of the device
- the credits for which the device is approved
- an overview of each device's systems and capabilities.

To describe its FSTDs, the operator may refer to certificates such as:

- the Flight Simulator Qualification Certificate
- the Flight Training Device Qualification Certificate
- the Synthetic Trainer Certificate.

If the operator refers to FSTD certificates within their exposition, the certificates should be attached as annexes to the exposition.

The operator's exposition must describe the purpose (under CASR Part 61) for which each device will be used. For example, if the operator intends using the device to accrue aeronautical experience for the issue of private and commercial pilot licences, this must be described in the exposition. The applicable number of hours and lesson content should be clearly detailed within the relevant training plans and syllabuses.

Qualification or approval

Initial evaluation and qualification of new CASR Part 60 devices is conducted by the Airworthiness and Engineering Branch (AEB) and the Flight Standards Branch (FSB). FSB has responsibility for the oversight of domestic and internationally located flight simulators and flight training devices approved under CASR Part 60.

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The initial evaluation, qualification and oversight of synthetic trainers, approved under CAO 45.0, is managed as follows:

- FSB, in collaboration with the appropriate regional office, has responsibility for conducting the initial evaluation and qualification of any new synthetic trainer wishing to meet Category C approval
- CASA's regional offices have responsibility for the oversight of domestically located synthetic trainers. FSB will provide technical advice to the regional offices as required. For information regarding the inspection of synthetic trainers, refer to Operational Standards and Requirements—Approved Synthetic Trainers (FSD2)

FSB has responsibility for internationally located synthetic trainers approved under CAO 45.0.

The exposition must include a description of the operator's procedures to ensure the initial and ongoing qualification/approval of each FSTD. The description should include, or make reference to a supplementary manual or documentation that provides:

- a record of the initial qualification/approval of the FSTD
- a procedure to manage recurrent fidelity checks, including the person responsible for ensuring the checks are completed within the required timeframe
- a procedure to manage a known or suspected deficiency in the realism or accuracy of the device, including the tests and calibration procedures required to establish the nature of the deficiency (the operator may include references to other documentation such as the quality system manual for qualified flight simulators and qualified flight training devices, or the Synthetic Trainer Operations Manual (STOM) for synthetic trainers approved under CAO 45.0 (synthetic trainers)
- a method for recording and reporting deficiencies
- a means for determining if a deficiency will suspend the qualification or approval of the device (e.g. a minimum equipment list that includes the deficiency)
- the procedure for the requalification or re-approval of the device following relocation.

The operator's documented procedures and instructions must set out the requirements for the operation of each FSTD. These procedures may be contained within a supplementary manual to which the exposition refers, for example the quality system manual or STOM. These procedures and instructions must be complied with in order to ensure the continuing qualification or approval of each device.

Further information in relation to the qualification or approval of FSTDs may be obtained from the following documents:

- CASR Part 60—Synthetic Training Devices
- Part 60 Manual of Standards—Synthetic Training Devices, which contains flight simulator criteria and standards for validation, functions and subjective tests
- AC 60-01 Flight simulator evaluations, which provides guidance on the content, process and proformas relevant to Part 60 FSTD evaluations
- AC 60-02—Flight Simulator Approvals, provides guidance on the type and quality of information to be included in an application to CASA, and incorporates a list of the States for which CASA currently recognises Flight Simulator Qualification Certificates
- AC 60-4(0)—Flight Training Devices, which provides advice on the application method and information requirements for Part 60 FSTD approval
- Operational Standards and Requirements—Approved Synthetic Trainers (FSD2), which contains the requirements for the approval of synthetic trainers
- Form 0248—Approved Synthetic Trainer Standards Checklist, which details the standards required for approved synthetic trainers. These standards are set out as a checklist which may be used as the 'accreditation test guide'.

3.6.11 Facilities

CASA must be satisfied, under section 28 of the Act and regulation 142.110 of CASR, that the operator's facilities are sufficient to conduct the activities safely.

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Facilities may include aircraft, flight simulation training devices, the premises and training aids used in the conduct of the activities.

As described by regulation 142.030 of CASR, a change to the location and operation of a training base (including the opening or closing of a training base) is considered a significant change and must be approved by CASA.

Facilities may be considered as either those where regular training is conducted, or facilities that are used on a temporary basis. This principle refers to facilities used regularly as a 'training base' and those used on a temporary basis, as a 'temporary location'.

Facilities considered 'training bases' - regular training locations

A training base may be considered as a facility where any of the following generally applies:

- regular training is conducted
- a person is assigned as the person responsible for day-to-day operations at that site
- permanent training and support facilities are maintained on site by the operator
- the operator's training aircraft are ordinarily based there.

Facilities that are not considered 'training bases' (temporary locations)

In addition to a training base, other facilities remote from a training base may be used by Part 142 operators on a temporary or non-routine basis.

If use of temporary locations is planned, the operator's exposition must include relevant operational procedures for the use of the temporary location to allow CASA to be satisfied that training at these 'temporary locations' can be conducted safely.

The inclusion of such procedures is not considered a significant change as such procedures are not described within regulation 142.030 of the CASR. However, if such procedures are not considered satisfactory, in the interests of aviation safety CASA may direct variation or removal of those procedures as described within regulation 142.155 of the CASR. It is expected the procedures must ensure consideration of the aspects listed below under 'Suitability'.

Administrative procedures when the operator changes locations

Information on training locations or bases is not printed on a Part 142 authorisation. However, operators are still required to follow the significant and non-significant change process.

Suitability

A site inspection of the facilities may be necessary to verify that the premises at each location (headquarters and each training base) are suitable.

The requirement to inspect a particular location may be waived where, within the preceding 12 months, the proposed premises and facilities were inspected for a substantially similar operation and were found suitable. Alternative inspection criteria may be determined, which may include the use of photographs or video presentation.

For contracted training and contracting checking activities conducted at a contracting operator's premises, the operator should determine the suitability of each contracting operator's facilities for flight planning and briefings involved in the conduct of the proposed activities.

Briefing rooms

Briefing rooms should:

- be of a number and size appropriate to the number of course participants to be briefed
- have provision for adequate climate control (heating and/or cooling)
- have lighting (natural or artificial) that is suitable for the size of the room
- be located and constructed so that outside disturbances and distractions are minimised

- be separate from administrative and recreational areas
- be adequately furnished and equipped for the conduct of briefings.

The operator should also have briefing rooms and facilities necessary for the conduct of internal training and checking.

Instructional aids

The operator's instructional aids should include:

- suitably sized smart boards, whiteboards or chalkboards to assist in the delivery of briefings. Computer assisted training aids are encouraged, however are not mandatory
- training aids such as aircraft models, panel posters, cockpit cut-outs and reference books relevant to the activities.

Training aids and equipment, including any audio-visuals, charts, model aircraft or aircraft components listed in course outlines, must be as described in the operator's exposition or training plans, and be appropriate to the activities for which they are used.

The operator should also provide the training aids necessary for the conduct of internal training and checking.

Flight planning area

The operator should have an area, separate from classroom and recreational areas, which allows for flight planning by students.

A suitable flight planning area may, as relevant to the proposed activities:

- provide ready access to flight planning materials such as the AIP, weather reports/forecasts and NOTAM
- provide access to a facility to submit flight plan notifications
- include a display of current revisions of maps and charts which may be relevant to the area of operation of the activities.

Examination areas

The operator should have a room which is free from noise or other distractions available for the conduct of examinations. A briefing room may be used as an examination room, provided sufficient other briefing rooms are available for use in the conduct of any other expected activities.

An area for the secure storage of examination material should be provided, for both unused and completed examination papers. Access to this area should be limited to those persons who have a direct need to access the location (e.g. the head of operations and the conducting officer). Access limitations may be documented in the operator's exposition or supplementary manual.

The examination area should include furniture and equipment adequate for the conduct of examinations.

Operational information

The operator's facilities should enable operational instructions and information of an essential nature to be produced and circulated to relevant personnel in a timely manner.

The facilities must include an up-to-date reference library.

Tarmac areas

Where applicable, the design of the operator's premises should:

- provide for safe access to the tarmac and aircraft parking area by course participants
- include appropriate access controls to allow course participants access to restricted areas, when required.

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The operator should have procedures to ensure that course participants are aware of precautions to observe around aircraft whilst on the tarmac area.

Aerodromes

The aerodromes used for flight training should be suitable for the purpose. To be considered suitable:

- the aerodromes must meet the specifications in CAAP 92-1AC 91-02 (1) or 92-2(2)91-29 for the type of activities being conducted
- the runways, taxiways and parking areas must be suitable for the proposed activities. For solo flight training in aeroplanes, the runway length used must be sufficient to provide an adequate margin of safety for the proposed training flights and the competency of the student pilot with reference to AC 91-02 – Guidance for aeroplanes with a MTOW not exceeding 5,700 kgs – suitable places to take-off and land, when applicable
- the aerodrome operator or control service (if any) should allow the proposed activities
- a satisfactory reporting mechanism should be in place for aerodromes that are not registered or certified, which ensures that aerodrome serviceability or availability matters are referred by the aerodrome owner to the operator.

Aircraft

The operator should demonstrate that it has a sufficient number of aircraft when considering the proposed number of course participants, and that the aircraft are suitable for the proposed activities. This is important to enable flying programmes to be carried out in the correct sequence and with due allowance made for contingencies such as unfavourable weather.

If an operator has or intends to have cross-hire agreements in place, the operator should demonstrate how the airworthiness of the cross-hired aircraft will be assured.

The aircraft that the operator proposes to use should be of a kind that are satisfactory for the activities and the stage of training for which they will be utilised. The aircraft must:

- hold the appropriate Certificate of Airworthiness categorisation (e.g. utility category)
- be certified for operations appropriate to the flight rules under which the activities are conducted.

The aircraft should be equipped, to a satisfactory standard, for the conduct of the particular activities for which they will be operated, for example:

- aircraft first registered after 1 January 1981 are fitted with an electronic intercom
- aircraft are fitted with fully functional dual controls .
- for aircraft used during contracted checking activities, where the examiner does not intend to occupy a control seat, there should be an appropriate 'jump' seat and intercom system that enables the examiner to observe the flight crew under check
- for the simulation of instrument meteorological conditions, a satisfactory means for limiting external visual reference should be provided. The operator's means for limiting external visual reference should be sufficient to ensure that all required manoeuvres and procedures are conducted by sole reference to instruments, whilst not restricting the instructor or examiner's ability to maintain an effective lookout.

Flight simulation training devices

Each device should be suitable for each described purpose under CASR Part 61. The device's systems and capabilities should be appropriate for the particular activity and stage of training for which it will be used.

Personnel fatigue management 3.7

The exposition must include a description of the way the operator proposes to manage the risk of fatigue in personnel.

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Refer to the CAO 48.1 Instrument 2019 Appendices 1-6 Technical Assessor Handbook and Worksheet and CAAP 48-1 for considerations relevant to assessing the suitability of the operator's policy for managing personnel fatigue.

Fatigue risk management system manual

If the operator elects to employ a FRMS, the exposition must include the fatigue risk management system manual.

Refer to the Fatigue risk management handbook for guidance in developing an FRMS Manual.

Flight and duty time limitations

The exposition must include a process to ensure that, before a flight commences, all flight crew comply with Civil Aviation Order 48.1 Instrument 2019 (CAO 48.1 Instrument 2019). The CAO 48.1 instrument 2019 is divided into 7 appendices.

Each instructor and examiner must comply with the limits and requirements mentioned in the subparagraph or subparagraphs to which the operator has chosen to comply.

Note: A Part 142 operator whose Part 142 activities are conducted solely and exclusively through the use of a flight simulation training device is excluded from the scope of CAO 48.1.

While no specific approval is granted for Part 142 operators wishing to be compliant with CAO 48.1 Instrument 2019 Appendices 1 to 6, the inspector must be satisfied that the operator has suitable procedures and practices to ensure that the activities can be conducted safely. As such, CASA must be satisfied that the operator has complied with at least one appendix that is appropriate for their operations.

For operations under appendices 1 to 6, inspectors must use <u>CAO 48.1 Instrument 2019 - Appendix 1-6</u> <u>Technical Assessor Handbook</u> and <u>CAO 48.1 Instrument 2019 Appendices 1-6 - Technical Assessor</u> <u>Worksheet.</u>

If the operator intends to use appendix 7 – fatigue risk management system, inspectors must refer to the Fatigue Risk Management System Handbook.

3.8 Safety management system

If the operator conducts activities in aircraft, or in aircraft and FSTDs, they must have a safety management system. The safety management system manual must be included in the exposition.

To assess the suitability of the operator's safety management system, the inspector must use both <u>Protocol</u> <u>suite (OPS.08) Safety management system assessment</u> and section 3.8 of this principle and the OPS.142 worksheet.

Note: It is anticipated that during a future amendment, safety management systems assessment information contained in the OPS.142 PPW will be incorporated into the OPS.08 PPW suite.

3.8.1 Safety policy, objectives and planning

Human factors integration

The operator's integration of human factors into the organisation's SMS should provide a managerial and organisational framework to ensure the systematic identification and analysis of relevant HF issues, and the application of appropriate tools, methods and measures to address such issues. The practical and methodical application of HF within an SMS is essential to ensure compliance and to optimise human performance.

The basic HF principles an operator should adopt to integrate HF into their SMS are:

• adoption of a holistic and integrated approach for HF principles into the organisation's SMS

- putting people at the centre of the system
- accounting for human variability
- ensuring transparency of organisational processes and actions
- taking into account social and organisational influences
- involving staff and respecting and valuing their input
- encouraging timely, relevant and clear two-way communication
- ensuring fairness of treatment.

Integrating HF is essential in the elements of the SMS. The following elements require an integration of human factors principles:

- risk management
- management of change
- the design and procurement of systems, equipment and facilities, and their subsequent use
- HF&NTS training
- job and task design
- safety reporting and data analysis
- incident investigation.

Risk management

Integration may be demonstrated by processes that:

- acknowledge HF issues within the organisation's hazard identification process
- ensure risk management strategies are applied during any proposed organisational changes
- recognise different human error types (slips, lapses, mistakes etc.)
- include human error management within the risk assessment process
- acknowledge fatigue related hazards.

Management of change

Integration may be demonstrated by processes that:

- ensure transparency of organisational processes and actions
- involve staff by encouraging two-way communication
- identify personnel who are likely to be affected by the proposed change
- identify roles and tasks likely to be affected by the proposed change.

The design and procurement of systems, equipment and facilities, and their subsequent usability

Integration may be demonstrated by processes that:

- identify how personnel within the organisation may be affected by modifications to systems, facilities and/or equipment
- identify how personnel may potentially interact with the new system, facility and/or equipment
- assess the risks associated with new systems, facilities and equipment.

HF/NTS training of personnel

Integration may be demonstrated by:

• internal/external HF&NTS training for personnel

- specialised HF&NTS training (e.g. CRM, FRMS etc.)
- a periodic review process of HF&NTS training to ensure effectiveness and relevance.

Job and task design

Integration may be demonstrated by processes that:

- identify human performance limitations, such as:
 - tasks involving time pressures
 - tasks involving complex sequencing of events
 - tasks that involve memory reliance
- identify safety critical tasks, and the personnel that perform them
- take into consideration the working environmental conditions.

Safety reporting and data analysis

Integration may be demonstrated by:

- a safety culture-based non-punitive hazard and incident reporting system
- provision of confidential reporting
- formal and informal meetings to openly discuss safety concerns
- feedback from management regarding action taken as a result of safety meetings and/or hazard/incident reports.

Incident Investigation

Integration may be demonstrated by:

- the use of conceptual models (such as Reason's model of accident causation) to determine active, latent and organisational failures
- the adoption of a positive safety culture where the organisation seeks to learn lessons from mistakes
- the provision of HF training for investigators, to provide the necessary skills to examine possible human performance limitations that may have contributed to an event
- ensuring fairness of treatment during incident investigations.

3.8.2 Safety assurance system

Internal safety investigation

The scale and scope of any investigation should be suitable to determine and validate the underlying hazards. A systems approach is useful to provide a broad appreciation of the context of any occurrence. Effort expended should be proportional to the perceived benefit to the organisation in terms of identifying hazards and risks.

The operator's internal safety investigation system should include:

- a reporting system
- an investigation policy
- the investigation methodology
- investigation recommendations and follow-up.

Reporting System

The operator should have certain processes in place for personnel to report hazards and/or events in the workplace. Processes that enable reporting may include:

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- a paper-based reporting system (e.g. via drop boxes)
- a web-based reporting system
- a reporting system on the Company's intranet.

The operator should have a documented procedure to determine what hazards and/or events need to be investigated. The procedure should be able to demonstrate that the operator has a review, classification and decision process in place to establish which hazards/events are investigated, and how thoroughly.

Investigation policy

Documentation for internal safety investigations should be clearly documented within the operator's SMS. Points covered should include:

- the scope of the investigation
- the composition of the investigation team
- how investigation outcomes are recorded for follow-up trend analysis
- the timeframes for completion.

The operator's investigation policy documented within the SMS should highlight the purpose of the investigation. The policy should clearly state that:

- each investigation will be systemic in nature (focus on the 'why' rather than just the 'what')
- the purpose of each investigation will not be to apportion blame to individuals, confirming that safety culture principles apply in relation to individual or team behaviours (therefore not focussing solely on the 'who' was involved)
- all contributing factors to the event should be considered, as well as root causes, rather than focusing only on the active failure (i.e. the event itself).

Investigation Methodology

The extent of each investigation will depend on the actual and potential consequences of the hazard/event. The operator may determine this through an initial risk assessment. Where resources are limited, the operator needs to determine that the effort expended, in terms of identifying hazards and risks to the organisation, will be proportional to the perceived benefit of the investigation.

The operator should have a means to ensure personnel conducting internal safety investigations (normally the safety manager or designate) are trained in aviation safety and safety investigations.

The operator should provide the safety investigator with:

- the authority to interview personnel or managers
- access to the source of any relevant company information.

Investigation recommendations

The operator should have a means for:

- using identified safety issues (as a result of an investigation) in re-evaluating existing risk controls/defences
- ensuring that identified safety issues and lessons learned, as well as further controls/defences incorporated to prevent a recurrence of the hazard/event, are reviewed by the appropriate safety committee
- ensuring that recommendations are used to improve and/or amend the organisation's SMS.

Identified safety issues, lessons learned, and controls/defences implemented to prevent the recurrence of a hazard/event should be disseminated throughout the operator's organisation. Methods the operator may use to facilitate this include:

- safety stand down days
- company intranet

- safety newsletter
- specific safety posters, prominently displayed within the operator's headquarters and training bases.

3.8.3 Flight data analysis program

To assess the suitability of the operator's flight data analysis program, use this section *instead of* the <u>Protocol suite (OPS.08) Safety management system assessment</u> FDAP section.

Operators conducting authorised Part 142 activities in aeroplanes with a MTOW of more than 27,000kg and/or rotorcraft with a MTOW of more than 7,000kg require an FDAP.

The FDAP should form an integral part of the SMS. Normally the FDAP would be located, as a stand-alone element, within the safety assurance component of the SMS.

The operator's FDAP should be non-punitive and de-identify the person who is the source of the data, whilst ensuring data gathered is secure. A feedback loop, which should be a part of the SMS, will allow timely corrective action to be taken where safety may be compromised by significant deviation from SOPs.

In determining the appropriateness of the operator's FDAP, consideration should be given to how the operator:

- will implement their FDAP
- will integrate the FDAP with their SMS
- will ensure the FDAP process is clearly documented within their SMS manual.

FDAP implementation

The operator's FDAP may be implemented by the operator or a third-party service provider deemed an appropriate person.

If the FDAP is provided by a third party the operator should have a means for acknowledging and retaining responsibility for the provision of the program and its effectiveness.

FDAP and SMS integration

To maximise safety benefits, the operator must ensure that the FDAP is integrated seamlessly within their SMS.

The operator may use the FDAP operational data provided by the program to provide quantitative information to support investigations that would otherwise be based on subjective reports.

The operator should have a means for ensuring operational data provided by the FDAP is regularly analysed and recorded in support of improving flight operations, and, as a direct consequence, the improvement of the SMS.

Documentation

The FDAP process should be clearly documented within the SMS manual.

The FDAP process should clearly outline:

- the aim of the program
- the data access and security policy, which restricts information to specifically authorised persons identified by their position
- the method used to obtain de-identified crew feedback on those occasions that require specific flight follow-up for contextual information
- the data retention policy and accountability, including the measures taken to ensure the security of the data
- the policy highlighting instances where the identity of the person who is the source of the data may be disclosed, such as:

- where the source provides written consent
- where a court order has been provided.
- the conditions under which advisory briefing or remedial training should take place
- the conditions under which punitive action will not occur in relation to the data, unless the person has:
 - deliberately contravened a provision of civil aviation legislation or the organisation's exposition
 - persistently engaged in unsafe actions without appropriate safety reasons.
- the participation of flight crew member representatives in the assessment of the data, the action and review process, and the consideration of recommendations
- the policy for the publishing the findings resulting from the FDAP, in order to improve the organisation's flight safety program and SMS.

3.8.4 Other requirements specific to a Part 142 safety management system

The operator's SMS must have processes in place to ensure authorised Part 142 activities are conducted in a planned and systematic manner. This includes processes for identifying and addressing deficiencies in training outcomes.

Monitoring the conduct of the activities

The operator's SMS should support the authorised activities in a structured and systematic way, by providing the policy and procedures for monitoring the conduct of the activities and ensuring they are conducted to the highest possible standard.

Auditing the activities

The operator must provide a process for auditing the activities in order to:

- confirm that the operator's systems, processes and procedures ensure that the activities are conducted in a planned and systematic manner
- determine the effectiveness of the training
- identify and correct deficiencies.

The operator should describe, within the safety assurance section of the SMS manual, a program of scheduled internal audits.

The operator's internal audit program should provide, but may not be limited to, confirmation that the following objectives have been met:

- the activities are conducted in accordance with the operator's written procedures, contained within the exposition and supporting documents
- the activities are conducted in compliance with relevant civil aviation legislation
- the activities are conducted to the highest possible standard and the desired outcomes are being achieved
- the operator's written procedures are relevant to the activities and are adequate to ensure ongoing compliance.

The operator's SMS manual should describe the following in relation to the auditing of activities:

- a statement of the scope for each scheduled audit
- how internal audits are to be planned, conducted and documented
- how evidence is to be collected and analysed
- how non-compliances are to be recorded
- how findings are to be reported

- how findings will contribute to the continuous improvement of the activities
- how feedback is to be provided and received
- the requirement to report significant audit findings to CASA, including who is responsible and how these reports will be provided.

The operator's internal audit program should include, but would not be limited to, procedures for:

- reviewing the operator's written procedures and practices for the conduct and management of activities, and ensuring course participants, instructors and examiners are complying with them
- reviewing all SMS elements, in particular hazard identification and risk management procedures
- reviewing the training management system, including training records and course syllabuses, to assist in determining student progress and identify any patterns of training deficiencies
- reviewing the internal training and checking system, including records relating to standardisation and proficiency checks, and personnel qualifications
- receiving feedback from instructors and examiners relating to student progress
- surveillance activities (e.g. monitoring the conduct of individual theory and flight lessons)
- reviewing training outcomes, which may be via pass rates, post-flight test feedback from examiners and average hours required to achieve a qualification
- reviewing theory examination outcomes.

The operator should provide evidence to verify that, at the completion of each audit, an audit report will be prepared and retained. Audit reports should include:

- a description of the audit findings and observations (e.g. non-compliances or change recommendations)
- evidence in support of audit findings and observations
- required follow up and corrective actions
- a plan for the implementation of corrective and preventative actions
- a schedule and timeframe for the follow up and closure of corrective and preventative actions.

The operator should describe a means to verify that following each audit, the operator's written procedures and course syllabuses will be assessed and improved where necessary in order to address any identified patterns of training deficiencies.

The SMS manual should identify personnel within the organisation who have the training, experience, responsibility and authority for:

- managing the operator's internal audit program
- carrying out internal audits at each of the operator's training bases
- identifying and recording any audit findings or deficiencies, and providing evidence in support of these findings or deficiencies
- analysing the root cause of a finding or deficiency
- developing and recommending corrective and preventative actions
- conducting management reviews to ensure corrective and preventative actions are addressed within an
 acceptable timeframe.

To support the effectiveness of the SMS, the operator should provide a means for personnel conducting internal audits to:

- maintain independence so as not to be subject to undue influence
- report directly to the safety manager, and for the safety manager to report audit findings directly to the chief executive officer.

The number of audits required will vary dependent upon the size of the organisation and the scope of the activities. The operator's schedule for internal audits should ensure that all aspects relating to the conduct of the activities are audited within a 12-month period.

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The operator's internal audit schedule should allow sufficient flexibility to enable the conduct of unscheduled audits when required.

The operator should provide a means for the safety manager to report to the chief executive officer in relation to audit findings.

The operator may require personnel involved in the conduct of internal audits (normally the safety manager or delegate) to have received internal quality auditor training.

Promoting continual improvement of the activities

The operator should continually seek to improve the standards and outcomes achieved in the conduct of the activities.

The operator must describe, within the safety assurance section of the SMS manual, a process for promoting the continual improvement of the activities.

The continual improvement of the activities may include, but would not be limited to, procedures which:

- ensure the ongoing promotion of the operator's safety policy and objectives
- provide for regular review of the activities to determine the validity of the safety policy and objectives
- encourage personnel to provide feedback and suggestions for improvement in relation to the activities (e.g. providing mechanisms for feedback relating to the operator's resources, written processes and procedures)
- encourage course participant feedback (e.g. via observations during day-to-day conduct of the activities, surveys, comments made during audits, end of course evaluations)
- ensure the timely implementation of corrective and preventative actions in response to deficiencies identified or recommendations made by the SMS and audit program
- ensure changes are communicated to personnel.

Evaluation of training outcomes from examiner feedback

The SMS must provide a process for evaluating the training outcomes from pre-flight test assessments and post-flight test feedback from examiners.

To evaluate training outcomes, the operator's SMS manual should describe a means for receiving feedback from examiners and identify the person who is responsible for reviewing and evaluating the feedback.

When deficiencies in training are identified via the evaluation of examiner feedback, the operator should have a means to ensure that:

- an investigation into the root cause of the deficiency is undertaken
- recommendations for corrective and preventative actions are made
- a plan is established for the implementation and monitoring of corrective and preventative actions.

The operator may choose to review root causes raised over a period of time, in order to determine any significant trends and identify areas requiring further rectification.

The operator should describe how feedback and evaluations in relation to training outcomes are to be recorded and retained.

Assessment of the suitability of facilities and resources

The operator's SMS must provide a process for the regular assessment of the suitability of the facilities and resources used in the conduct of the activities.

The operator's process for assessing the suitability of facilities and resources should include procedures for assessing:

 each FSTD, to determine it remains suitable for each described purpose under CASR Part 61 (the device's systems and capabilities should be appropriate for the particular activity and the stage of training for which it will be used)

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- the facilities at each training base, to determine if:
 - briefing rooms are of a number and size appropriate to the number of course participants, free from outside disturbances, adequately furnished and equipped, and have provision for adequate climate control
 - instructional aids relevant to the activities are available and are of an adequate number (such as suitably sized smart boards or whiteboards)
 - training aids and equipment relevant to the activities are available and are of an adequate number (such as audio-visuals and charts)
 - examination areas are of a number and size appropriate to the number of course participants, and include furniture and equipment required for the conduct of examinations
 - examination material is maintained in secure storage with appropriate controls in place for examination access
 - the reference library and operational information are up to date, relevant to the conduct of the activities, and readily available.

The operator should describe how facility and resource assessments will be recorded and retained.

Change recommendations

The operator's SMS must provide a process for recommending changes to the operator's systems for safety management, training management and internal training and checking.

Recommendations for change should be raised and reviewed in accordance with the operator's change management processes, described within the exposition or document to which the exposition refers.

To assess the suitability of the operator's procedures for the management of change, refer to section 3.4 of this principle.

Operation and maintenance of flight simulation training devices

Considerations in relation to the operation and maintenance of flight simulation training devices are provided in section 3.6.10 of this principle.

3.9 Quality assurance management system

If conducting authorised Part 142 activities only in FSTDs, the operator must have a quality assurance management system. The quality assurance management system manual must be included in the exposition.

3.9.1 Operation and maintenance of flight simulation training devices

The operator's quality assurance management system should support the operation of the FSTDs in a structured and systematic way, to ensure that each device:

- continues to be an effective training tool
- remains compliant with the legislative requirements and technical standards of CASR Part 60, the Part 60 MOS and the relevant flight simulation training device ACs (AC 60 series).

Considerations in relation to the initial evaluation and approval of FSTDs are provided in section 3.6.6 of this principle.

The operator's quality assurance management system must include, but may not be limited to, the following documentation and information relating to the operation and maintenance of FSTDs:

- a quality policy
- management responsibility
- document control
- resource allocation

- quality procedures
- internal audit.

The operator's quality assurance management system manual should describe procedures to ensure that, on a continuing basis:

- the operator's written procedures and instructions, contained in the exposition and supporting documentation, are adequately defined and documented
- the operator's written procedures and instructions are appropriate to the conduct of the activities
- the operator's personnel comply with written procedures and instructions, and civil aviation legislation relevant to the conduct of the activities
- FSTDs are operated and maintained in accordance with the operator's written procedures and instructions and the manufacturer's maintenance schedule
- FSTDs are operated and maintained in compliance with relevant legislative and technical requirements
- the operator's facilities and resources are appropriate for the conduct of the activities.

3.9.2 Conduct of authorised activities

The quality assurance management system must ensure the activities are conducted in a planned and systematic manner, evaluating training outcomes and addressing deficiencies in training.

The quality assurance management system manual should describe how the operator will:

- plan and conduct the activities
- evaluate training outcomes
- identify and address deficiencies and non-compliances
- provide for the development, implementation and recording of corrective and preventative actions
- ensure feedback is provided to the chief executive officer in relation to the efficiency and outcomes of the system
- ensure documentation in relation to the system and procedures is recorded and retained.

The operator's quality assurance management system manual should contain, but may not be limited to, the following:

- a quality policy statement
- manual version control
- relevant terminology
- management and organisational details, such as:
 - a description of the operator's organisational structure
 - management responsibilities
 - personnel experience requirements, responsibilities and allocation of duties
 - personnel training and education requirements.
- FSTD operation, evaluation, maintenance and repair procedures, such as:
 - FSTD qualification
 - master qualification test guide
 - day to day procedures
 - functions and subjective testing
 - software configuration and control
 - resource allocation.

- procedures for promoting the continual improvement of the activities and assessing facility and resource suitability
- system processes and procedures, including:
 - reporting procedures
 - corrective and preventative action procedures
 - implementation, monitoring and closure procedures
 - standard forms and checklists.
- audit procedures
- management analysis procedures
- change recommendation procedures
- document retention policy.

Where information or procedures referred to above are contained in other documentation, the operator may choose to refer to this documentation within the quality assurance management system manual.

3.9.3 Quality assurance management system inclusions

3.9.3.1 Quality policy

Management's commitment to, and responsibility for, quality assurance should be formally expressed in a series of statements in the operator's quality policy. The policy, usually signed by the operator's chief executive officer, should demonstrate that the quality assurance management system is endorsed at the highest level of management within the operator's organisation.

The quality policy, usually documented within the quality assurance management system manual, should define the operator's quality objectives for the operation and maintenance of its FSTDs. It may also refer to the operator's quality objectives for the conduct of the authorised activities and training outcome targets.

The quality policy should highlight how the operator intends to meet its stated quality objectives and establish an environment and culture of continual improvement.

The operator's quality objectives for the operation of FSTDs should include:

- maintaining ongoing compliance with the required technical, legislative and operator specific standards
- reaching the operator's targets for the reliability and availability of each FSTD
- meeting other specific requirements (e.g. work health and safety standards).

The operator should demonstrate how the quality policy will be communicated, with visible endorsement from management to personnel throughout its organisation.

The operator should communicate its quality policy and objectives to third parties involved in the supply of goods and services for the conduct of the activities. The operator holds the overall responsibility for the quality of all goods, services and resources used during the conduct of the activities, and therefore written agreements between the operator and third parties should clearly define the quality objectives in relation to the goods and services to be provided.

3.9.3.2 Management responsibility

The chief executive officer is responsible for ensuring the implementation and ongoing management of the quality assurance management system. The chief executive officer, in conjunction with the quality assurance manager, should establish the quality policy and set the operator's quality objectives.

Management should have a means to communicate and promote the quality policy to personnel throughout the organisation, ensuring all personnel are aware of and accept the quality policy and objectives, and the standards required to meet the objectives.

The chief executive officer is responsible for ensuring adequate finances, resources and personnel are in place to support the quality assurance management system.

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Quality assurance responsibilities, accountabilities and processes should be documented within the quality assurance management system manual and communicated to personnel.

Lines of responsibility throughout the organisation should be clearly defined, including responsibilities for quality on the part of senior management.

The responsibilities of all members of management, irrespective of other functions, as well as of employees with respect to the quality assurance management system, should be identified.

Management positions with authority to make decisions regarding the quality assurance management system should be defined.

3.9.3.3 Document control

The operator must provide verification that, in accordance with regulation 60.095 of CASR, the following documents relating to each FSTD shall be retained until at least 3 years after the device is decommissioned:

- the master Qualification Test Guide (QTG)
- modification records
- quality system records
- the results of all validation tests mentioned in the master QTG, and all functions and subjective tests.

The operator should describe within the quality assurance management system manual the requirements for the retention of documentation such as:

- technical logs
- update history
- other system records (e.g. audit schedules, quality inspection and audit reports, responses to findings, corrective and preventative action reports, follow-up and closure reports and management evaluation reports).

The operator should provide a means for controlling the revision and distribution of the quality assurance management system manual to personnel.

The operator must provide a means to ensure that the quality assurance management system manual, and any related documentation, is up to date and made readily accessible to personnel involved in the operation and maintenance of FSTDs and the conduct of the activities.

The quality assurance management system manual may be electronic, provided the operator can demonstrate that controls have been implemented to ensure the currency and integrity of the manual. These controls may include:

- provisions to ensure that any downloaded or printed copies are automatically designated as 'uncontrolled' as part of the download process
- methods for maintaining the integrity of the manual, including:
 - access arrangements
 - identifying who is authorised to make amendments to the master document
 - identifying how amendments will be traced.
- acceptance of electronic signatures on the master document
- a means and schedule for backing up the manual.

3.9.3.4 Resource allocation

The operator should demonstrate that sufficient resources are allocated to ensure proper operation of the quality assurance management system and internal audit program.

The operator should provide a means for ensuring that personnel who are delegated duties for managing the quality assurance management system receive training which covers:

• an introduction to the concept of the quality assurance management system

- quality management principles
- the contents of the quality assurance management system manual
- audit techniques
- reporting and recording methods
- how the quality assurance management system supports continuous improvement within the organisation.

The operator must ensure that instructors and examiners are competent to conduct an activity in a FSTD, prior to the activity being conducted.

3.9.3.5 Quality procedures

The quality assurance management system must include procedures to ensure the correct operation and maintenance of the operator's FSTDs and the capture of systematic defects.

The system should detail schedules and methods for monitoring all aspects of the operation of each FSTD.

The operator's quality assurance management system procedures may include, but would not be limited to, procedures for:

- the day-to-day operation of each device in order to ensure that the operator's quality objectives are achieved, for example:
 - daily functional pre-flight checks
 - defect reporting, follow up investigation and rectification
 - notification to personnel of defects
 - the use of tracking mechanisms
 - equipment calibration, software and hardware control, and spares handling.
- monitoring compliance with the required technical standards
- ensuring that each device is maintained in accordance with the requirements of CASR Part 60
- ensuring that preventative maintenance is carried out in accordance with the manufacturer's published schedules
- ensuring compliance with airworthiness directives issued for the aircraft being simulated
- ensuring notifications received from the original equipment manufacturer regarding routine improvements to systems and procedural changes (e.g. manufacturer service bulletins and advisory material) are reviewed and if necessary incorporated into standard operating procedures and training syllabuses
- configuration management, which ensures:
 - the continued integrity of the equipment and software of each FSTD
 - that each device is maintained in a configuration that accurately represents the aircraft being simulated (e.g. control of training loads, updates to visual models, navigation aids etc.).
- ensuring the review of device modifications to determine any potential effect on the characteristics of the device
- the conduct of validation tests and functions and subjective tests
- monitoring compliance with the procedures of the quality assurance management system
- reporting to CASA in relation to:
 - changes in the characteristics of a device
 - a significant non-compliance or major failure of a device
 - the deactivation or relocation of a device
 - a major safety issue associated with the installation of a device.

The quality assurance management system may also include procedures to ensure compliance with the relevant work health and safety regulations. These may include, but would not be limited to, procedures describing:

- safety briefing requirements
- actions to be taken in the event of a fire or smoke detection
- actions to be taken in the event of electrical, mechanical, hydraulic and pneumatic hazards.

The quality assurance management system should include procedures to produce and review performance measures, usually referred to as metrics, for monitoring FSTD reliability and serviceability. The operator should demonstrate how these metrics will be used as a tool for measuring the system's effectiveness against the quality objectives. Metrics may be used to track:

- FSTD availability
- defects
- open defects
- defect closure rates
- training session interrupt rates
- training session compliance rating.

The quality assurance management system should provide for the ongoing assessment of the quality of the actions performed during each of the quality procedures, ensuring that deviations from the standard are recognised, reported and corrected.

The operator should provide a means for personnel to provide feedback in relation to the quality assurance management system and its effectiveness, and for this feedback to be reviewed and acted upon when required.

3.9.3.6 Internal audit

The operator should monitor and assess compliance with the procedures of the quality assurance management system to ensure the objectives of the system are met, and improvements are made to the system when required. Assessment of compliance may be achieved through a program of scheduled internal audits.

The operator's internal audit program should provide, but may not be limited to, confirmation that the following objectives have been met:

- each FSTD is operated and maintained to the highest standard
- the required technical standards for each FSTD are met
- the operator's written procedures and relevant civil aviation legislation are complied with by all personnel
- the operator's written procedures are relevant and adequate to ensure ongoing compliance.

The operator's quality assurance management system manual should describe the following in relation to the internal audit program:

- a statement of the scope for each scheduled audit
- how internal audits are to be planned, conducted and documented
- how evidence is to be collected and analysed
- how non-compliances are to be recorded
- how findings are to be reported
- how feedback is to be provided and received
- the requirement to report significant audit findings to CASA, including who is responsible and how these
 reports will be provided.

The quality assurance management system manual should identify personnel within the organisation who have the training, experience, responsibility and authority for:

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- managing the internal audit program
- · carrying out internal audits at each of the operator's training bases
- identifying and recording any audit findings or deficiencies, and providing evidence in support of these findings or deficiencies
- analysing the root cause of a finding or deficiency
- developing and recommending corrective and preventative actions
- conducting management reviews to ensure corrective and preventative actions are addressed within an
 acceptable timeframe.

To support the effectiveness of the quality assurance management system, the operator should provide a means for personnel conducting internal audits to:

- maintain independence so as not to be subject to undue influence
- report directly to the quality assurance manager.

The number of audits required will vary dependent upon the size of the organisation, the number of FSTDs utilised and the scope of the authorised activities. The operator's schedule for internal audits should ensure that all aspects of the operation are audited within a 12-month period.

The operator's internal audit procedures should provide for the assessment of:

- whether the operator's organisational structure and chain of command are appropriate to assist in achieving the operator's quality objectives
- whether the operator's quality objectives remain relevant to the operation
- compliance with the operator's quality assurance procedures, and the effectiveness of these procedures
- the effectiveness of the corrective action program
- the qualification level and technical status of each device
- device configuration management, including airworthiness directives issued for the particular aircraft being simulated
- completed documentation, such as validation tests mentioned in the master QTG for the device
- completed records relating to all functions and subjective tests conducted within the current (and planned) training program (or equivalent sample approved by CASA)
- defect deferral rates
- technical log sheets, maintenance records and configuration control records
- the suitability of the operator's quality assurance documentation, such as standard forms, logs and checklists
- the effectiveness and suitability of personnel training.

The conduct of scheduled functions and subjective tests (fly-outs) for each device may be included as part of the operator's internal audit program to assist in confirming the continued suitability of each FSTD. The operator's procedures should ensure that, during functions and subjective testing, the assigned check pilot/flight examiner:

- holds the relevant aircraft type rating
- is current on the aircraft type
- is familiar with the operation of the FSTD.

The operator should provide evidence to verify that at the completion of each audit, an audit report will be prepared and retained. Audit reports should include:

- a description of the audit findings and observations (e.g. non-compliances or change recommendations)
- evidence in support of audit findings and observations
- required follow up and corrective actions

- a plan for the implementation of corrective and preventative actions
- a schedule and timeframe for the follow up and closure of corrective and preventative actions.

The operator's internal audit program should include procedures to verify that the recommended corrective and preventative actions resulting from internal audit findings have been implemented, and that the desired outcomes have been achieved.

The operator's internal audit schedule should allow sufficient flexibility to enable the conduct of unscheduled audits when required.

The operator should provide a means for the quality assurance manager to report to the chief executive officer in relation to audit findings.

The operator may require personnel involved in the conduct of internal audits (normally the quality assurance manager or delegate) to have received internal quality auditor training.

3.9.4 Quality assurance management system processes

3.9.4.1 Auditing the activities

The operator must provide a process for auditing the activities in order to:

- confirm that the operator's systems, processes and procedures ensure that the activities are conducted in a planned and systematic manner
- determine the effectiveness of the training
- identify and correct deficiencies.

The operator should describe, within its quality assurance management system manual, a program of scheduled internal audits.

The operator's internal audit program should provide, but may not be limited to, confirmation that the following objectives have been met:

- the activities are conducted in accordance with the operator's written procedures, contained within the exposition and supporting documents
- the activities are conducted in compliance with relevant civil aviation legislation
- the activities are conducted to the highest possible standard and the desired outcomes are being achieved
- the operator's written procedures are relevant to the activities and are adequate to ensure ongoing compliance.

The operator's quality assurance management system manual should describe the following in relation to the auditing of activities:

- a statement of the scope for each scheduled audit
- how internal audits are to be planned, conducted and documented
- how evidence is to be collected and analysed
- how non-compliances are to be recorded
- how findings are to be reported
- how feedback is to be provided and received
- the requirement to report significant audit findings to CASA, including who is responsible and how these
 reports will be provided.

The operator's internal audit program should include, but would not be limited to, procedures for:

- reviewing the operator's written procedures and practices for the conduct and management of activities, and ensuring course participants, instructors and examiners are complying with them
- reviewing the training management system, including training records and course syllabuses, to assist in determining student progress and identify any patterns of training deficiencies

- reviewing the internal training and checking system, including records relating to standardisation and proficiency checks, and personnel qualifications
- receiving feedback from instructors and examiners relating to student progress
- surveillance activities (e.g. monitoring the conduct of individual theory and flight lessons)
- reviewing training outcomes, which may be via pass rates, post-flight test feedback from examiners and average hours required to achieve a qualification
- reviewing theory examination outcomes.

The operator should provide evidence to verify that at the completion of each audit, an audit report will be prepared and retained. Audit reports should include:

- a description of the audit findings and observations (e.g. non-compliances or change recommendations)
- evidence in support of audit findings and observations
- required follow up and corrective actions
- a plan for the implementation of corrective and preventative actions
- a schedule and timeframe for the follow up and closure of corrective and preventative actions.

The operator should describe a means to verify that following each audit, the operator's written procedures and course syllabuses will be assessed and improved where necessary, in order to address any identified patterns of training deficiencies.

The quality assurance management system manual should identify personnel within the organisation who have the training, experience, responsibility and authority for:

- managing the operator's internal audit program
- carrying out internal audits at each of the operator's training bases
- identifying and recording any audit findings or deficiencies, and providing evidence in support of these findings or deficiencies
- analysing the root cause of a finding or deficiency
- developing and recommending corrective and preventative actions
- conducting management reviews to ensure corrective and preventative actions are addressed within an acceptable timeframe.

To support the effectiveness of the quality assurance management system, the operator should provide a means for personnel conducting internal audits to:

- maintain independence so as not to be subject to undue influence
- report directly to the quality assurance manager.

The number of audits required will vary dependent upon the size of the organisation and the scope of the activities. The operator's schedule for internal audits should ensure that all aspects relating to the conduct of the activities are audited within a 12-month period.

The operator's internal audit schedule should allow sufficient flexibility to enable the conduct of unscheduled audits when required.

The operator should provide a means for the quality assurance manager to report to the chief executive officer in relation to audit findings.

The operator may require personnel involved in the conduct of internal audits (normally the quality assurance manager or delegate) to have received internal quality auditor training.

3.9.4.2 Promoting the continual improvement of the activities

The operator should continually seek to improve the standards and outcomes achieved in the conduct of the activities. The operator may demonstrate this commitment via its quality policy.

The operator must describe, within its quality assurance management system manual, a process for promoting the continual improvement of the activities.

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The continual improvement of the activities may include, but would not be limited to, procedures which:

- ensure the ongoing promotion of the operator's quality policy and objectives
- provide for regular review of the activities to determine the validity of the quality policy and objectives
- encourage personnel to provide feedback and suggestions for improvement in relation to the activities (e.g. providing mechanisms for feedback relating to the operator's resources, written processes and procedures)
- encourage course participant feedback (e.g. via observations during day-to-day conduct of the activities, surveys, comments made during audits, end of course evaluations)
- ensure the timely implementation of corrective and preventative actions in response to deficiencies identified or recommendations made by the quality assurance management system and audit program
- ensure changes are communicated to personnel.

3.9.4.3 Evaluation of training outcomes

- The quality assurance management system must provide a process for evaluating the training outcomes from pre-flight test assessments and post-flight test feedback from examiners.
- To evaluate training outcomes, the operator's quality assurance management system manual should describe a means for receiving feedback from examiners and identify the person who is responsible for reviewing and evaluating the feedback.

When deficiencies in training are identified via the evaluation of examiner feedback, the operator should have a means to ensure that:

- an investigation into the root cause of the deficiency is undertaken
- recommendations for corrective and preventative actions are made
- a plan is established for the implementation and monitoring of corrective and preventative actions.

The operator may choose to review root causes raised over a period of time, in order to determine any significant trends and identify areas requiring further rectification.

The operator should describe how feedback and evaluations in relation to training outcomes are to be recorded and retained.

3.9.4.4 Assessing the suitability of facilities and resources

The operator's quality assurance management system must provide a process for the regular assessment of the suitability of the facilities and resources used in the conduct of the activities.

The operator's process for assessing the suitability of facilities and resources should include procedures for assessing:

- each FSTD, to determine it remains suitable for each described purpose under CASR Part 61 (the device's systems and capabilities should be appropriate for the particular activity and the stage of training for which it will be used)
- the facilities at each training base, to determine if:
 - briefing rooms are of a number and size appropriate to the number of course participants, free from outside disturbances, adequately furnished and equipped, and have provision for adequate climate control
 - instructional aids relevant to the activities are available and are of an adequate number (such as suitably sized smart boards or whiteboards)
 - training aids and equipment relevant to the activities are available and are of an adequate number (such as audio-visuals and charts)
 - examination areas are of a number and size appropriate to the number of course participants, and include furniture and equipment required for the conduct of examinations
 - examination material is maintained in secure storage with appropriate controls in place for examination access

- the reference library and operational information are up to date, relevant to the conduct of the activities, and readily available.

The operator should describe how facility and resource assessments will be recorded and retained.

3.9.4.5 Change recommendation

The operator's quality assurance management system must provide a process for recommending changes to the operator's systems for quality assurance, training management and internal training and checking.

Recommendations for change should be raised and reviewed in accordance with the operator's change management processes, described within the operator's exposition or document to which the exposition refers.

To assess the suitability of the operator's procedures for the management of change, refer to section 3.4 of this principle.

3.10 Drug and alcohol management plan

Use Protocol suite (OPS.99) DAMP entry control and assessment.

4. Internal training and checking system

4.1 General

A Part 142 operator must have an internal training and checking system and describe in their exposition how internal training and checking will be conducted.

Part 142 does not specify the training and checking to be conducted under the system. Therefore, although the objectives and extent of internal training and checking are at the discretion of the operator, there are several mandatory training and checking requirements under Parts 61 and 142 (such as instructor proficiency checks, HF&NTS training etc.) that should be performed by that part of the operator's organisation responsible for the internal training and checking system. Instructor or examiner rating revalidation required under CASR Part 61 should be the foundation of the operator's internal training and checking system.

To be suitable, the inspector must determine that the internal training and checking system is appropriate for the size, nature, and complexity of the organisation. Items the inspector should consider include, but are not limited to:

- number of its personnel
- number and kinds of aeroplanes it operates
- nature of activities the operator conducts
- location and distribution of the operator's Part 142 activities.

Other items the inspector should consider include the organisational structure. The reporting lines of the internal training and checking organisation should be described in the exposition.

The responsibility for Part 142 internal training should be assigned to that part of the operator's organisation responsible for the Part 142 internal training and checking system. If an operator does not choose to do this, then the exposition must make other provisions to ensure personnel complete mandatory training.

The inspector should also consider the need for any support systems associated with the internal training and checking activities. The use of administrative staff and an IT system to manage the operator's internal training and checking system may be appropriate for larger and more complex organisations.

The operator must demonstrate a means of ensuring that a copy of the manual will be provided to all Part 142 personnel who have duties or responsibilities related to internal training and checking. The manual must be provided before the person first begins carrying out those duties or responsibilities. For example, compliance may be achieved during training for induction to the internal training and checking organisation.

4.1.1 Description of internal training and checking

Internal training

The operator's description of how it conducts internal training should include the objectives, scope, depth, frequency and methods for the internal training

The system for internal training should include processes for:

- development of training and assessment plans, course outlines and syllabuses and course joining instructions
- addressing unsatisfactory performance
- training records management
- determining instructional and support personnel required for completion of a course
- · determining minimum qualifications and experience of instructional staff
- scheduling of instructional staff and resources
- instructional standardisation and supervision

- determining and providing facilities and equipment
- management of flight training areas and low flying training areas
- flight check systems for training operations
- command responsibilities
- authorisation of pilot in command
- carriage of passengers
- student performance review
- examinations and tests
- relationship protocols with internal course participants
- graduation administration.

Other internal training, while not prescribed under Part 142 but essential in ensuring suitably qualified and competent personnel, includes induction training and upgrade training.

Induction Training

The internal training and checking system manual should describe the operator's process for ensuring induction training is given to all Part 142 personnel, before commencing their duties and responsibilities.

The process should include analysis of training requirements for each inductee (the training must be appropriate to each person's role in the Part 142 organisation and sufficient to enable each person to safely and effectively discharge their duties and responsibilities).

Objectives for the operator's induction training may include:

- company structure, governance, management and authorised activities
- introduction to human factors principles and non-technical skills
- the training management system
- the internal training and checking system
- the safety management system
- the fatigue management system
- the change management system
- drug and alcohol management plan
- the administration system
- employment conditions
- section manager introduction
- role task training and mentoring including responsibilities and duties.

Upgrade training

The exposition should include a process for providing training to instructors and examiners for progression to new training and checking roles and tasks.

The operator must have a means to ensure instructor proficiency checks are conducted by either CASA, a flight examiner or an approved person, and that examiner proficiency checks are only conducted by CASA or an approved person.

Other training

The operator's internal training and checking system manual may describe the operator's process for ensuring familiarisation training is provided to each prospective key personnel, prior to the appointee carrying out the duties and responsibilities of the position. The manual may also describe the operator's HF/NTS training.

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Internal checking

The operator's description should include the objectives, scope, depth, frequency and methods for the internal checking.

Instructor or examiner rating revalidation required under Part 61, is achieved through biennial proficiency checks, and should be the foundation of the operator's internal checking system. Instrument rating revalidation, through annual proficiency checks, may also form part of the checking regime.

The operator must have a means to ensure instructor proficiency checks are conducted by either CASA, a flight examiner or an approved person, and that examiner proficiency checks are only conducted by CASA or an approved person.

Additionally, under Part 142, the operator must provide for annual standardisation and proficiency checking of instructors.

Part 142 standardisation and proficiency checks must only be conducted by the head of operations or a delegate.

Although examiners are not subject to mandatory checks of standardisation and proficiency, the operator may include checking of examiners for standardisation and proficiency. If the operator proposes to include examiner standardisation proficiency checking, the operator must describe these in their internal training and checking system manual.

Other than as required under Part 61 and Part 142, the operator is not bound to conduct checks more frequently. The content and frequency of additional checking is at the discretion of the operator.

As the frequency of mandatory checks under Part 61 and Part 142 may not provide sufficient assurance of competence on a continual basis, the operator may schedule additional checks to unequivocally establish the competence of an instructor or examiner to perform any assigned task according to the operator's published requirements (this may include specialist skills such as instruction in formation aerobatics or helicopter winching).

In relation to internal checking, the operator's internal training and checking system manual should include:

- policy statements describing the objectives, scope, depth, frequency and methods of internal checking
- a process for ensuring proficiency checks is devised to assess competence of personnel to perform assigned roles (the elements and standards in terms of Part 61 MOS, should be specified for each check)
- a means for ensuring the checks assess both knowledge and skill of personnel
- methods and procedures for assessment of competency
- an assessment rating system
- instructions to examiners for the conduct of each check
- · provision of clear assessment guidelines addressing both technical and non-technical skills
- guides that may include a 'word picture' grading system
- the competencies and standards to be assessed, that should be listed in a proforma applicable to each type of check
- a means for examiner standardisation
- scheduling of checks
- proforma templates for reporting performance
- procedures for when standards are not met
- procedures providing that assessments of 'not competent' should be followed by retraining before further assessment is conducted
- procedures for managing checks that are not completed before a due date.

4.1.2 Duties and responsibilities

An exposition must describe the duties and responsibilities of personnel assigned to conduct internal training and checking.

While the operator is not required to establish a key personnel position of head of training and checking, a person responsible for managing and supervising the organisation should be appointed.

4.1.3 Understanding the training management system

The operator must have procedures to ensure all personnel have an understanding of the training management system.

Procedures for use of the system may be included in training given on induction to the training and checking organisation.

4.1.4 Completion of internal training and checking

The operator's internal training and checking system manual must describe procedures to ensure that all Part 142 personnel complete the internal training and checking described in the manual.

The following considerations may be relevant:

- the procedures should ensure that personnel are not rostered for Part 142 activities unless training and checking requirements have been met
- this should also apply to all Part 142 instructors and examiners conducting internal training and checking
- compliance may be monitored either manually or electronically
- common industry practice is to employ a software recording/monitoring/alerting program for renewable qualifications, recency and other regulatory requirements, as part of the crew rostering process.

4.1.5 Supervision of personnel

The operator must have procedures to ensure internal training and checking personnel are effectively supervised.

The ratio of supervisors to instructors and examiners should be stated and should be sufficiently small to enable effective supervision at all times.

The performance of instructional and examining activities must be closely supervised to ensure flight safety and quality of product. The operator's policy and process for the appointment of supervisory personnel, as well as the scope and limitations of responsibility of each supervisory position, should be described.

Supervision may be enhanced through regular staff meetings with agenda for:

- review of current and planned internal training and checking activities
- standardisation of training and checking
- review of the reporting of training and checking.

The operator's internal training and checking system manual should describe the minimum qualifications and experience for appointment of a person responsible for managing and supervising the training and checking organisation.

4.1.6 Command responsibility during internal training and checking

The operator's internal training and checking system manual must describe a policy for command responsibility for each training and checking activity.

The policy should require that Part 142 instructors and examiners conducting internal training and checking in aircraft, must be authorised as pilot in command.

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4.1.7 Number of check pilots and minimum crew qualifications

The operator's internal training and checking system manual must describe the minimum number of check pilots required to meet all obligations for checking.

The minimum number should be sufficient to provide for unforeseen contingencies.

The manual must also describe the minimum qualifications and experience for personnel conducting training activities.

The manual should describe a method for establishing the minimum number of training and checking positions required (the method may be based on known Part 142 activity commitments, including a margin for contingencies).

As regulation 142.230 requires instructors and examiners conducting authorised activities to be authorised to do so under Part 61, the minimum qualifications established by the operator must be at least those required under Part 61.

The minimum experience should be at least sufficient to safely and competently conduct each kind of training and checking.

The specification of criteria for qualifications and experience should be evident as part of the planning process and be included in the training plan for each kind of training course.

4.1.8 Safety precautions

The operator's internal training and checking system manual must include any restrictions, specifications or precautions applicable to the conduct of internal training and checking.

These may relate to aircraft system shutdown, the simulation of emergency and abnormal conditions, and limitations on weather and environment).

Examples may be:

- instructors or examiners must not introduce simultaneous multiple unrelated simulated emergency or abnormal situations during the flight
- after a simulated failure in an aircraft, instructors or examiners must ensure the aircraft is configured back to a normal operating mode before another simulated failure may be introduced - except where the simulated failures are linked (e.g. electrical failure leading to a loss of aircraft attitude information)
- instructors or examiners must not trip circuit breakers as a means of introducing systems/component failure, unless this is specifically permitted in the aircraft flight manual
- only emergency and abnormal systems failures listed in the aircraft Pilot Operating Handbook, Quick Reference Handbook, Minimum Equipment List, Flight Crew Operating Manual (or however described), are to be simulated by an instructor or examiner during training or checking
- limitations and conditions for practicing touchdown autorotation landings in a helicopter
- instructors or examiners must ensure that the visual component of an instrument approach, when flown in an aircraft in VMC, conforms to the published circuit direction.

4.1.9 Standards to be achieved

The operator's internal training and checking system manual must describe the standards to be achieved when conducting internal training and checking.

While the minimum competency standards are those specified in the Part 61 MOS, the operator may specify more stringent or additional standards. If the standards of the Part 61 MOS are adopted, the manual must include a statement of policy to that effect.

Specific standards of competency for each manoeuvre or procedure should be specified on each checklist for internal checking.

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4.1.10 Remedial training

The operator's internal training and checking system manual must describe standardised techniques for remedial training sequences for common faults.

Standardised techniques should be included in instructor standardisation and proficiency checks.

4.1.11 Instructor standardisation and proficiency checks

Standardisation of training personnel is essential for maintaining safe and effective flight instruction. Policy and process for standardisation should be described in the internal training and checking system manual.

A process for standardisation of training personnel may include:

- policy
- management responsibility
- procedures for setting and recording instructional standards
- procedures for establishing and conducting a detailed program of standardisation to ensure consistent instructional content and methods.

Standardisation of instructors should be verified through internal checking, which must include the standardisation and proficiency check for instructors required under regulation 142.320.

The scope of checking should be sufficient to unequivocally establish competence to perform any assigned Part 142 instructional task according to the operator's published requirements.

The operator should have a process to ensure records are kept of each standardisation check, including:

- the specific objectives of each check
- · descriptions and assessments of performance
- a pass or fail result.

The procedures should ensure that non-standard practices or knowledge deficiencies noted during the check are debriefed, recorded and subject to remedial training as determined by the head of operations or delegate.

If the operator's personnel will conduct activities under Parts 141 and 142, the operator must demonstrate that the flight crew competency requirements of both parts are satisfied. For example, a standardisation and proficiency check applicable to a Part 142 instructor must check competencies required to conduct Part 142 activities; a check conducted under CASR Part 141 is unlikely to suffice. However, in some cases, a more stringent requirement applicable to the competency of personnel under one CASR Part, may satisfy a less stringent requirement of the other (e.g. an instrument proficiency check).

Validity

Regulation 142.325 prescribes the requirements for a valid check. The operator's internal training and checking system manual must describe a procedure for ensuring instructors hold a valid standardisation and proficiency check for the operator.

The procedure must ensure personnel are not rostered for authorised activities unless they meet the requirements of subregulation 142.320(2). Standard industry practice is to employ a software recording/monitoring/alerting program for renewable qualifications, recency and other regulatory requirements, as part of the crew rostering process.

The procedure for ensuring instructors hold valid standardisation and proficiency checks should address:

- frequency of checking (not less than prescribed under regulation 142.325 of CASR)
- scheduling of checks to ensure compliance with regulation 142.325 of CASR
- policy for determining that both the competency and standardisation content of checks is relevant to the activity an instructor has been engaged to conduct
- recording performance
- remedial action.

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The procedure must ensure standardisation and proficiency checks are only conducted by the head of operations or a delegate.

Content

The operator's internal training and checking system must include a process for managing the content of standardisation and proficiency checks.

The process must ensure the content of each check addresses the competencies necessary to conduct activities an instructor has been engaged to conduct, and must address instructional standardisation and instructional proficiency.

The operator should describe a policy for instructional standardisation, with objectives of ensuring instruction is consistent with standard operating policy and procedures. For example, the operator may require a standardised instructional sequence for demonstrating the effects of aircraft controls, or a standardised method for teaching forced landing.

The procedures should ensure the minimum instructional standard includes an ability to deliver briefings and flight instruction to at least the standards under the Part 61 MOS.

Checks should be based on demonstrations of representative lessons selected from company syllabuses, and should include demonstrations of:

- a flight lesson briefing (long briefing)
- pre-flight briefing
- flight/simulator lesson
- administrative requirements for the selected lesson.

The process must ensure proficiency is assessed against the standards of the Part 61 MOS for flight instructor ratings and endorsements.

Management of the content of standardisation and proficiency checks should include:

- determination of knowledge and competency requirements for each instructor to complete their duties
- a means for selecting different cross sections of knowledge and competencies, for each check
- procedures for designing the conduct of the check
- procedures for preparing an assessment plan
- scheduling the conduct of a check to ensure compliance with regulation 142.325 of CASR (relating to validity periods)
- recording and reporting procedures
- a means for recommending remedial training.

Conduct

A check may only be carried out by the head of operations, or a person authorised by the head of operations. The operator's internal training and checking system manual must describe a process for authorising persons to conduct Part 142 instructor standardisation and proficiency checks.

The process for authorising persons to conduct checks should include:

- selection criteria
- training
- a duty and responsibility statement
- monitoring and review of performance.

4.1.12 FSTD competency

If the operator conducts activities in FSTDs, they must describe in the internal training and checking system manual a process for ensuring simulator instructors are competent to use the device for activities assigned to an instructor.

The process may include training but must include an assessment to determine competency.

Results of an assessment should be recorded.

A simulator instructor should not be assigned to conduct activities in FSTDs unless the instructor is competent to perform the activity in the make and model of device to be used.

4.1.13 Completion of HF/NTS training

The exposition should describe explicit procedural controls to ensure that no instructors or examiners carry out Part 142 activities before completing the organisation's HF&NTS training. Such a control may be ensuring that personnel complete the HF&NTS training as part of their induction training, which is completed before commencement of personnel duties. The operator may also require the head of operations, as part of their responsibilities, to approve the instructor and examiner's completion of the training prior to personnel commencing Part 142 activities.