



Australian Government  
Civil Aviation Safety Authority

# MULTI-PART ADVISORY CIRCULAR

## AC 119-11 and AC 138-02 - Version 5.0

### Training and checking systems

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Advisory circulars are intended to provide advice and guidance to illustrate a means, but not necessarily the only means, of complying with the Regulations, or to explain certain regulatory requirements by providing informative, interpretative and explanatory material.

**Advisory circulars should always be read in conjunction with the relevant regulations.**

## Audience

This advisory circular (AC) applies to all air transport operators and some aerial work operators.

## Purpose

This AC provides guidance on establishing and managing a training and checking system in accordance with the relevant provisions of Parts 119 and 138 of the *Civil Aviation Safety Regulations 1998 (CASR)*. The intention is to provide background information and expand on aspects of the system to ensure the intent of the legislation is clear.

## For further information

For further information, contact CASA's Personnel Licensing, Aerodromes and Air Navigation Standards (telephone 131 757).

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

# Status

This version of the AC is approved by the Branch Manager, Flight Standards.

**Note:** Changes made in the current version are not annotated. The document should be read in full.

Version	Date	Details
v5.0	May 2024	<p>Major changes to support the implementation of training and checking systems for all Part 133 and 135 operators, and some Part 138 operators.</p> <p><b>Note:</b> Readers are reminded that CASA AC's can use Appendices and Annexes. Appendices are contained at the end of the main AC document. Annexes are separate documents linked to this AC wherever this AC is published on CASA's website.</p> <p>The changes include:</p> <ul style="list-style-type: none"> <li>• added significant new content to Chapter 2 about how to read this AC, its Appendices and Annexes</li> <li>• added significant new content to Chapter 3 to explain the core concepts of 'what is a training and checking system?'</li> <li>• replaced all existing Annexes as follows:                             <ul style="list-style-type: none"> <li>• new Annex A containing specific guidance for Part 121 training and checking events and training and checking personnel</li> <li>• new Annex B containing specific guidance for Part 133, 135 and 138 training and checking events and training and checking personnel</li> <li>• deleted previous Annexes A, B and G because sample training and checking system manual / exposition content is now in CASA's Sample training and checking manual and guide</li> <li>• deleted previous Annexes C, D, E and F because Part 121, 133, 135 and 138 training and checking compliance matrices are now published on CASA's website in the protocol, principle and worksheets documents (collectively called the Flight Operations Protocol Suite) used by CASA inspectors to assess operator applications for new AOCs and new aerial work certificates (these documents can be found under the 'Related rules and publications' sections of the <a href="#">CASR Part 121, 133, 135 and 138 webpages</a> on the CASA website).</li> </ul> </li> </ul> <p><b>Note:</b> For transitional operators using the training and checking exemptions in EX87/21, CASA will provide dedicated compliance matrix tools for you at an appropriate time on the <a href="#">flight operations transition training and checking webpage</a>.</p> <p>The Appendices have been amended as follows:</p> <ul style="list-style-type: none"> <li>• Appendix A information about training and checking personnel has been moved to Annexes A and B as appropriate</li> <li>• Appendix B information about Part 121 recurrent training has been moved to Annex A</li> <li>• Appendix C, which contained a generic grading system, has been renumbered as Appendix A</li> <li>• Appendix D, which contained a generic proficiency check record relevant to operators holding a particular kind of 61.040 approval, has been renumbered as Appendix B</li> <li>• Appendix E, which contained a generic requalification matrix for</li> </ul>

























## 2 Introduction

### 2.1 Reading this AC

2.1.1 This AC applies to Part 121, 133, 135 and 138 operators who are required to have a training and checking system.

**Note:** Chapter 3 of this AC provides an explanation of a training and checking system.

2.1.2 This AC:

- broadly discusses key training and checking system concepts
- contains specific guidance about:
  - o specific Part 121, 133, 135 and 138 training and checking events
  - o the personnel who can conduct training and checking events for the different kinds of personnel of an operator under Parts 121, 133, 135 and 138.

2.1.3 This AC does not contain guidance on training and checking obligations arising from other CASR Parts, even though an operator may have obligations to conduct training and checking of their personnel<sup>3</sup> in relation to the following matters:

- Part 119 requirements for operational safety-critical personnel to complete the operator training and assessment program in human factors principles and non-technical skills (guidance can be found in AC 119-12)
- Part 92 dangerous goods training requirements
- Part 99 drug and alcohol management plans
- CAR and CASR pilot-conducted aircraft maintenance.

2.1.4 This AC is divided into 5 chapters (Chapters 1 through 5), 3 appendices (Appendices A through C), and 2 annexes (Annexes A and B).

2.1.5 Operators are recommended to read the chapters, appendices and annexes that apply to their operations, as outlined in the list below:

- All operators:
  - o Chapters 2, 3, 4 and 5
  - o Appendices A, B and C
- Part 121 operators:
  - o The chapters and appendices for all operators
  - o Annex A
- Part 133, 135 and 138 operators:
  - o The chapters and appendices for all operators
  - o Annex B.

2.1.6 This AC should be read in conjunction with the following other documents:

- AMC/GM entries relating to training and checking regulations in the Part 119, 121, 133, 135 and 138 AMC/GM documents
- For Part 121 operators:
  - o training and checking related exemptions in CASA EX82/21 and EX83/21

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<sup>3</sup> As an example of a training and checking system needing to cover more than just the matters directly related to the operation of an aircraft, see paragraph 119.170(2)(a) of CASR.

- o training and checking related recognition of prior events instruments CASA EX12/24<sup>4</sup> and CASA 91/21<sup>5</sup>.
- For Part 133 and 135 operators:
  - o training and checking related exemptions in CASA EX82/21, EX84/21, EX85/21 and EX87/21
  - o training and checking related recognition of prior events instruments CASA 92/21 and 93/21<sup>6</sup>.
- For Part 138 operators:
  - o training and checking related exemptions in CASA EX86/21 and EX87/21
  - o training and checking related recognition of prior events instrument CASA 94/21<sup>7</sup>.

2.1.7 For Part 133, 135 and 138 operators currently holding an Australian air transport AOC (a Part 119 AOC) or aerial work certificate, and who held an AOC authorising charter or aerial work operations before 2 December 2021, but did not hold a CAR 217 approval before 2 December 2021, information on how to submit your training and checking system for approval, once CASA announces any dates by which an application must be submitted<sup>8</sup>, can be found on the [flight operations regulations transition training and checking CASA webpage](#).

## 2.2 Regulatory overview

**Note:** See paragraph 2.1.3 for a non-comprehensive list of rules with training and checking obligations that are not discussed in this AC.

2.2.1 All Part 121, 133 and 135 operators are required to have a training and checking system. This system must cover all aircraft used by the operator.

**Note:** Some operators are permitted by exemptions in CASA EX87/21 to temporarily not have a training and checking system for some aircraft.

2.2.2 Some Part 138 operators are required by regulation 138.125 of CASR to have a training and checking system.

**Note:** Some operators are permitted by exemptions in CASA EX87/21 to temporarily not have a training and checking system for some aircraft.

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<sup>4</sup> CASA EX12/24 applies to Part 121 operators that transitioned to full compliance with the training and checking Part 119 and 121 regulations and MOS when they ceased using the exemptions in Parts 7 and 7A of CASA EX87/21. For operators that transitioned to full compliance immediately on the commencement of Part 121 on 2 December 2021 - see instrument CASA 91/21.

<sup>5</sup> CASA 91/21 applies to Part 121 operators that transitioned to full compliance with the training and checking Part 119 and 121 regulations and MOS on 2 December 2021. For operators that only transitioned to full compliance when they ceased using the exemptions in Parts 7 and 7A of CASA EX87/21 - see CASA EX12/24.

<sup>6</sup> CASA 92/21 and 93/21 apply to Part 133 and 135 operators, respectively, that transitioned to full compliance with the training and checking Part 119, 133 / 135 rules on 2 December 2021. For operators that will only transition to full compliance when they cease using the exemptions in Parts 8 and 9 of CASA EX87/21 - a separate exemption instrument will be issued (this has not yet been done as at the publishing of v5.0 of this AC).

<sup>7</sup> CASA 94/21 applies to Part 138 operators that transitioned to full compliance with the training and checking Part 138 rules on 2 December 2021. For operators that will only transition to full compliance when they cease using the exemptions in Part 10 of CASA EX87/21 - a separate exemption instrument will be issued (this has not yet been done as at the publishing of v5.0 of this AC).

<sup>8</sup> At the time of publishing v5.0 of this AC, the date by which such operators must submit their proposed training and checking system documentation and HOTC nominee to CASA had not been announced.



### 2.2.3 Key points relating to the interpretation of regulation 138.125 of CASR are:

- Although regulation 138.125 of CASR requires an operator who meets one of the triggering events in this regulation to have a training and checking system for ALL of their aerial work operations, an exemption in section 8 of CASA EX86/21 changes this regulation so that:
  - o the training and checking system is only required for the specific aerial work aircraft and/or aerial work operations covered by the triggering events in regulation 138.125 of CASR
  - o is not required for other aircraft or operations of the operator.
- Operators can then also voluntarily choose to place particular operations under their training and checking system, providing further flexibility - see the next paragraph after the Example below.

#### **Example (relates to the effect of the general exemption in section 8 of CASA EX86/21)**

An operator using a turbine-engine jet aeroplane and a single-engine piston-engine aeroplane is only required, due to the effect of the exemption in section 8 of CAS EX86/21, to use a training and checking system for the flight crew and other operational safety-critical personnel directly associated with the jet aeroplane and not the single-engine piston-engine aeroplane.

### 2.2.4 Part 138 operators can elect, by applying for a CASA approval, to voluntarily use a training and checking system, with its associated requirement for the operator to fill the additional key person position of Head of Training and Checking. Refer to sections 4.03 and 4.04 of the Part 138 MOS.

#### **Notes:**

1. Using a training and checking system alters how the crew member training and checking obligations contained in Chapters 23, 24 and 25 of the Part 138 MOS. Some operators may decide that these differing obligations better suit their operations.
2. Additional guidance on the different kinds of obligations regarding crew member training and checking can be found in [AC 138-01 Part 138 Core Concepts](#).

### 2.2.5 Individual regulations within Subparts 121.N, 121.P, 133.N, 133.P, 135.N, 135.P, 138.N and 138.P of CASR require crew members to complete specific training events and checking events.

## 2.3 Approval under regulation 61.040 of CASR

#### **Notes:**

1. Operators do not need to read this section if they do not intend to apply for a 61.040 approval relating to the mentions of 'training and checking system' in Part 61 of CASR.
2. These 61.040 approvals are a different matter compared to an operator obtaining the 121.010 approval mentioned in Annex A to this AC. The 61.040 approval permits the operator training and checking system to substitute, in the manner outlined in the relevant Part 61 regulations, for an individually conducted Part 61 event. The 121.010 approval mentioned in Annex A of this AC permits an operator to vary certain Part 121 training and checking requirements in Subpart 121.N or 121.P of CASR.

### 2.3.1 The pilot training and checking requirements under Part 61 of CASR are separate from the training and checking requirements of Parts 119, 121, 133, 135 and 138 of CASR.

- 2.3.2 Operators can use individual training and checking flights to achieve multiple CASR Part outcomes, generally using one of the following methods:
- use a training or check pilot that satisfies the requirements of the multiple CASR Parts applying to the combined outcomes.
  - for certain Part 61 recency, flight review and proficiency check requirements, apply for, and receive, a regulation 61.040 approval permitting the operator's training and checking system to substitute for the relevant Part 61 requirement.
- 2.3.3 The regulation 61.040 approval can apply to any of 22 different regulations under Part 61 of CASR. It enables flight crew members to meet their Part 61 obligations through successfully participating in an operator's training and checking system (the *approved system*). The operator's approval will list the regulations to which the regulation 61.040 approval applies. The relief provisions provided by the approval do **not** provide relief from the recency requirements of Parts 121, 133 and 135 of CASR.
- 2.3.4 A person is successfully participating in an operator's *approved system* if<sup>9</sup>:
- the person is employed by the operator
  - the operator's training and checking system covers the operation
  - the person has met the requirements under the system for entry into the *approved system*
  - the person is permitted under the system to be assigned by the operator for duty for the operation.
- 2.3.5 The *approved system* will ensure the flight crew member continues to meet the competencies required to exercise the privileges of their licence and ratings and is therefore taken to have a valid Part 61 proficiency check and flight review. As the way the flight crew member achieves the required safety outcomes is specific to the operator, flight crew members are only authorised to conduct flight operations for that operator.
- Note:** Operations conducted for the operator can include Part 91 operations, for example a ferry flight. In this case, the flight crew member is participating in the training and checking system.
- 2.3.6 If the flight crew member wishes to fly aircraft for another operator, or for personal recreation or other activities, then the flight crew member must comply with the relevant Part 61 requirements for that external activity.
- 2.3.7 The *approved system* must demonstrate compliance with the recurrent training and proficiency checks required by the FOR.

**Example**

The *approved system* will need to demonstrate how it complies with regulation 121.575 of CASR (Holding a valid Part 121 proficiency check).

- 2.3.8 The training and checking activities of the *approved system* do not require the training and checking personnel to hold Part 61 authorisations such as instructor or examiner ratings.
- 2.3.9 Check pilots can be authorised by the training and checking system to conduct training and checking activities. However, the training and checking system must include

<sup>9</sup> Regulation 61.010 of CASR.

standards for and procedures to train and check the personnel involved in the activities in lieu of the Part 61 standards. Consideration should be given to the instructor and examiner competencies for the equivalent personnel.

- 2.3.10 Check pilots operating under the *approved system* are not required to use the CASA Flight Test Management System, nor to follow the Flight Examiners' Handbook. Instead check pilots must comply with the policies and procedures detailed in the operator's exposition or training and checking manual. Additionally, these check pilots do not make entries in the flight crew member's licence indicating a flight review or proficiency check has been conducted. Instead, the operator is required to issue evidence of ongoing proficiency<sup>10</sup> to exercise the privileges of the licence, which must be carried by the flight crew member. An example of a proficiency check record is at Appendix B of this AC.
- 2.3.11 An operator must demonstrate to CASA how its program of training and checks ensures proficiency in the competencies required by the Part 61 MOS relevant to the rating and the operation to gain an approval under regulation 61.040 of CASR for the training and checking system. Operators may develop a series of training and checks to be completed over a defined period to ensure flight crew proficiency is maintained rather than having just the required proficiency checks. The approved system allows operators to develop training and checks that are designed to meet specific operational needs. This flexibility can provide for a proficiency check that covers competencies from several ratings conducted over a defined period.
- 2.3.12 Typically, an *approved system* will be designed to raise the proficiency of flight crew members through training. Although the checks are a necessary element, the emphasis should be on training to improve the proficiency of flight crew. An example of a Part 121 recurrent training program is at Annex A of this AC.
- 2.3.13 To be effective, an *approved system* should contain the following elements:
- a grading system that provides greater granularity on proficiency
  - word pictures that relate to each grading score to support inter-rater reliability
  - check pilot training in the use of the word pictures and grading system
  - the ability to collect and use the data from flight crew performance to continuously develop the system
  - a system to identify underperforming flight crew and provide additional training to improve proficiency
  - input from the SMS to identify areas where additional training can improve proficiency; the SMS should then provide feedback on the effectiveness of that training
  - feedback from flight crew and check pilots on the effectiveness of the approved system.
- 2.3.14 To be granted an approval under regulation 61.040 of CASR, the operator's exposition or training and checking manual, in addition to the items listed in section 3.6 of this AC, must detail policies and procedures to ensure flight crew are *successfully participating* in the *approved system*. By successfully participating in the *approved system* the flight crew member is taken to satisfy the applicable Part 61 flight review, proficiency check and recent experience requirements until the flight crew member exits the system.

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<sup>10</sup> Section XIII Conditions/Licence remarks in FCL.

- 2.3.15 CASA considers the flight crew member as exiting the *approved system* once the flight crew member ceases to be employed by the operator or commences employment with another operator (including a secondment). The approved system must also manage periods of absence from line flying duties and ensure the proficiency of flight crew members prior to their return to line operations following an absence.

## 2.4 Contracted training and contracted checking

- 2.4.1 The defined terms *contracted training* and *contracted checking* refer to a situation where the Part 121, 133, 135 or 138 operator **contracts out** the delivery of training and checking that is the responsibility of the operator to another operator (see the following paragraph), as opposed to **contracting in** an individual instructor or examiner to conduct a specific training and checking event.

### Notes:

1. The AOC or AWC holder who contracts a person or operator to conduct some training and checking activities always retains the obligation and responsibility to ensure that the personnel are competent to perform their assigned roles.
2. Although the obligation for completing Part 61 training or tests rests with individual pilots, some operators pay and arrange for the completion of Part 61 events as part of pilot employment packages. In the situation where a Part 121, 133, 135 or 138 operator contracts, for example, a Part 141 operator to conduct Part 61 training or tests for their pilots, this is not contracted training or contracted checking.

- 2.4.2 *Contracted training* and *contracted checking* are both defined to be a *Part 142 activity*. Regulation 142.015 of CASR defines that there are 3 different kinds of Part 142 activities, each of which is required to be specifically authorised. Most Part 142 operators, as of the publishing of v5.0 of this AC, do not hold the specific authorisation to conduct either contracted training or contracted checking.

### Example

A Part 133 operator contracts with a Part 141 operator for them to provide, on request, a flight instructor to the Part 133 operator to conduct a Part 133 flight crew member proficiency check for the Part 133 operator, using the Part 133 operator's operational procedures, training procedures and training documentation.

The Part 141 operator does not have any involvement in the activity, aside from the provision of the flight instructor.

In addition to holding the appropriate flight instructor rating and endorsement, and being able to exercise the privileges of this rating and endorsement, the flight instructor must meet any experience and entry control requirements, any recency or proficiency requirements, and completed any training required by the Part 133 operator's exposition before conducting the activity.

The Part 133 operator retains the obligation to ensure that the flight instructor meets the Part 133 operator exposition requirements. As a proficiency check is not an air transport flight, and the flight instructor is the pilot in command (PIC), the flight instructor has the obligation to ensure the flight complies with the requirements of Part 91.

This example does not require the Part 141 operator to hold a Part 142 authorisation.

The Part 141 operator is effectively a labour hire company and has no other involvement in the activity.

- 2.4.3 Part 121, 133 and 135 flight crew checking activities for aeroplanes or rotorcraft with a maximum operational passenger seat configuration (MOPSC) of more than 30 seats, or maximum payload capacity of at least 3 410 kg, must<sup>11</sup> be conducted by the Part 121, 133 or 135 operator and cannot be contracted out to a Part 142 operator.
- 2.4.4 Multiple kinds of training and checking activities can be contracted out to third-party training providers that do not hold a Part 142 authorisation. Examples include those related to the following:
- any operational safety-critical personnel training or checking where the personnel are not flight crew members
  - dangerous goods training (regardless of whether a flight crew member)
  - human factors and non-technical skills (HF and NTS) training (regardless of whether a flight crew member)
  - emergency and safety equipment training (regardless of whether a flight crew member)
  - refresher training (regardless of whether a flight crew member).
- 2.4.5 Training and checking activities conducted by a contracted third-party provider (including a Part 142 operator) must be conducted in accordance with the originating air operator's exposition or training and checking manual. The originating air operator is responsible for providing a current copy of the relevant sections of the exposition or training and checking manual to the contracted third-party provider.
- 2.4.6 If the operator contracts out a training and checking activity to a Part 142 operator, the 142 operator is required to hold a Part 142 authorisation permitting the contracted training (defined term in regulation 142.020 of CASR) or contracted checking (also a defined term in regulation 142.020 of CASR) in the aircraft or flight simulator.
- 2.4.7 If the operator contracts out a training and checking activity to a Part 142 operator, the Part 142 operator has responsibility for the safety of the flight and the conduct of the training or check. However, the training or check must be conducted in accordance with the originating operator's training and checking system.
- 2.4.8 See Chapter 3 of this AC for information on the recommended training and checking related content of an exposition or training and checking manual.
- 2.4.9 The HOTC (for flight crew) and the CEO (for all other operational safety-critical personnel) must<sup>12</sup> ensure that all training and checking is conducted in accordance with the operator's exposition or training and checking manual.
- 2.4.10 If the operator has a contract with a Part 142 operator for the conduct of training and checking activities for flight crew, in addition to ensuring that all the originating operator processes and procedures are followed before, during and after a training and checking events, the HOTC must specifically ensure that:

<sup>11</sup> See subregulation 119.170(6) of CASR.

<sup>12</sup> See paragraphs 119.130(e) and 119.150(c) of CASR.

- each person who conducts training and checking is authorised under Part 61 to conduct those activities
- they tell the Part 142 operator, in writing, of any change in the exposition or training and checking manual relating to the training and checking activities the Part 142 operator conducts under the contract.

## 3 Training and checking system basics

### 3.1 Reading this chapter

- 3.1.1 All operators are recommended to read section 3.2.
- 3.1.2 Low complexity small operators are recommended to read section 3.3.
- 3.1.3 All other operators are recommended to read sections 3.3 to 3.8. These sections contain guidance to assist larger operators that have a diverse range of aircraft, operations, and training and checking needs.

### 3.2 What is it?

- 3.2.1 Simply put, a training and checking system specifies the WHO, WHAT, WHEN, WHERE and HOW of an operator's obligations relating to training and checking.

WHO is required to complete a training and checking event.

WHO is used to deliver a training and checking event.

WHEN must training and checking events be done.

WHERE will training and checking events be conducted.

WHAT training and checking resources will be used to conduct a training and checking event.

HOW (specifically) will an individual training and checking event be conducted.

- 3.2.2 For an operator that hasn't been previously required to have a training and checking system, they have already been thinking about the WHO, WHAT, WHEN, WHERE, WHAT and HOW above.
- 3.2.3 For example, under the old pre-2 December 2021 rules, charter or aerial work operators who were **not** required to have a CAR 217 training and checking organisation often had requirements for new pilots to be 'trained' in the operator's processes and procedures before conducting a flight and do a 'check' flight under supervision by a senior pilot before conducting a charter or aerial work flight without supervision. Operators generally used only particular personnel to conduct this 'training' or 'check' and these personnel knew what kinds of things they would do during the event.
- 3.2.4 By formalising, standardising and documenting these matters, the effectiveness and consistency of these events is increased.

### 3.3 CASA's sample training and checking manual

- 3.3.1 CASA has produced 2 sample training and checking manuals, and an accompanying Guide to these samples, to assist operators with meeting their training and checking system requirements.
- 3.3.2 These 3 documents are available at this link - [Industry compliance templates](#).
- 3.3.3 The sample manuals have been developed primarily for smaller Part 133 and 135 operators where the scope of their operations is limited, and they may not have the resources nor needs to maintain dedicated personnel managing the training and checking system. They provide these smaller operators with practical processes and systems that meet the criteria mentioned in section 3.1 of this AC.

- 3.3.4 Larger operators with a diverse range of aircraft, operations, and training and checking needs are likely to find that CASA's sample training and checking manuals do not have sufficient detail to be easily adapted to suit their needs. These operators are recommended to read sections 3.3 through 3.8, amongst other material in this AC, to help construct their system and documentation.
- 3.3.5 These manuals can be used as a standalone training and checking manual, or as a volume of an exposition. They can be used by operators outside the defined scope as a basis for developing a manual that meets their more complex needs, especially for operators close to the scope of operator described in the Guide to the samples.
- 3.3.6 Operators who have limited numbers of personnel, or conduct a limited range of activities, for example an operator with just one aeroplane and pilot, do not need complex structures and systems to manage their training and checking requirements. The scalable and outcomes-based nature of the regulations mean that these operators need only provide documentation that suits their particular circumstances.

#### Example

A VFR operator with one type of aircraft and two pilots chooses to use an external Part 61 flight instructor for all of their training and checking activities.

In this instance, the management of this operator's training and checking system is straightforward since it would amount to one check event per year per pilot, and this could be carried out without significant infrastructure, processes or administrative focus from the operator.

### 3.4 Things to consider when developing a training and checking system

- 3.4.1 For operators whose training and checking needs cover a greater span and require more detail and structure than the sample manual provides, it is expected and reasonable for an operator's training and checking system to be developed in consideration of the size, nature, and complexity of their air operations. Scalability considerations include the:
- number and kinds of aircraft
  - number and nature of activities conducted
  - size and experience levels of the operator's workforce
  - location and distribution of the operation and organisation.
- 3.4.2 The primary role of a training and checking system is to ensure that operational safety-critical personnel are proficient in the required competencies to support air operations.
- Note:** *Competency* is defined as a combination of skills, knowledge and attitudes required to perform a task to the prescribed standard, whereas *proficiency* refers to level of skill or expertise displayed.
- 3.4.3 The training and checking system will need to:
- identify the required skills, knowledge and attitudes required for a particular operator's operation



- ensure that the persons encompassed by the system have achieved the required level of competency.

3.4.4 For an operator to successfully achieve their training and checking objectives, they will need to have:

- an appropriately designed system to manage the training and checking
- adequate facilities and resources
- personnel who are appropriately authorised and capable of delivering the training and conducting the assessments.

3.4.5 Operators should carry out an analysis of their activities to determine the appropriate level of resources to manage the system.

3.4.6 Where applicable, SMS<sup>13</sup> processes should support a risk-based approach to training and checking. An SMS can provide valuable input through training needs analysis into shaping training and checking to meet operational needs and improve performance.

3.4.7 Major components of a training and checking system may include:

- WHO:
  - o is responsible for the system (normally the Head of Training and Checking (HOTC)) (see section 3.3)
  - o administers the processes of the system (depends on the scale of the operator, might be dedicated administration staff, might be dedicated training staff, might be the HOTC)
  - o will conduct training and checking events (may require task analysis to determine the competencies of training and checking personnel and the number of them required to support the operator's operations; how will these people be selected, trained and their competency maintained) (see section 3.4).
- WHEN / WHERE / WHAT:
  - o training organisation structure (see section 3.5 below)
  - o management processes (including contracted training and/or checking management if this applies to the operator)
  - o (not mandatory) objectives of the system (such as 'to produce measurable evidence of improvement in the proficiency of operational safety-critical personnel' and 'to ensure that all operational safety-critical personnel have undertaken the required training and checking within the required timeframe')
  - o training facilities (classrooms, computer-based training systems (CBT), flight simulation training devices (FSTD), aircraft, etc)
  - o if a 61.040 approval is held: a policy detailing when a person is participating in the training and checking system, and detailing method for re-entry when not participating.
- HOW: (see section 3.6)
  - o instructions for the conduct of training and checking events
  - o criteria for achievement of competency by personnel under training and check
  - o instructions for recording training and checking outcomes and expiry dates.
- HOW will the operator determine the system is working? (see section 3.7 below)
  - o procedures to review training and checking records to identify trends
  - o management review methodology

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<sup>13</sup> For further advice on SMS refer to [AC 119-01 – Safety management systems for air transport operations](#).

- o procedures for review and revision of the training and checking processes and procedures
- o feedback loops, for example, the relationship between flight data analysis program (FDAP) and SMS, and revisions to training and checking policy and programs.

### 3.5 Training and checking key personnel

- 3.5.1 Parts 119 and 138 of CASR allow one individual to fulfil multiple key personnel positions depending upon the complexity of the operation. Part 138 of CASR requires the operator to hold an approval under regulation 138.025 of CASR if the HOTC position is to be held by the CEO and/or HOO. This difference is due to the increased probability of operations and activities that require a HOTC under Part 138 being of higher complexity than air transport operations under Part 119.
- 3.5.2 Operators who only carry out a limited number of training and checking events are likely to have only one key person available to occupy the roles of HOFO/HOO and HOTC. CASA's sample training and checking manual separates these roles since their responsibilities are different. However, provided the single individual can carry out both sets of responsibilities there is no reason why these key positions cannot be occupied by the same person.
- 3.5.3 It is preferable for the HOTC to be qualified to act as a training and/or checking pilot on at least one of the operator's main types, but this is not a regulatory requirement. However, the HOTC must be capable of effective supervision of all the activities of the training and checking system.
- 3.5.4 The regulations require that the HOTC is responsible for flight crew training and checking. However, this does not preclude the HOTC also being the HOFO or being appointed as the responsible manager for other training and checking activities such as cabin crew, air crew, or other operational safety-critical personnel.
- 3.5.4.1 For larger operators with multiple key personnel, the operator should demonstrate that clearly defined reporting and communication lines exist between key personnel, and for its training and checking functions, management, supervisors, and other personnel (including contractors) involved in the training and checking activities.
- 3.5.4.2 AMC and GM for Parts 119 and 138 of CASR provide information on organisational structures to support air transport and aerial work operations.

### 3.6 Persons conducting training and checking events

- 3.6.1 CASA must be satisfied that the operator has sufficient suitably qualified, experienced and competent personnel to ensure that training and checking activities can be conducted safely and effectively<sup>14</sup>.
- Note:** The expected level of qualifications, experience and capability will vary according to the scope and complexity of the activities.
- 3.6.2 The operator's exposition or training and checking manual should include:

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<sup>14</sup> For AOC holders, see subparagraph 28(1)(b)(iii) of the Civil Aviation Act 1988. For AWC holders, see paragraph 138.040(1)(c) of CASR.

- for all training and checking personnel:
  - o a detailed job description, including the activities authorised
  - o a description of their responsibilities/accountabilities
  - o minimum capability and experience requirements
  - o training, authorisations and qualifications
  - o recency/requalification requirements.
- a description of how the operator will ensure the standardisation of training and checking personnel.

3.6.3 When determining the relevant manual content relating to training and checking personnel, it is recommended that operators consider the following:

- number of different aircraft types flown by the operator
- number of required training and checking activities
- projected aircraft and simulator hours to be flown
- ground course theory subjects to be delivered
- rostering arrangements for the training and checking personnel (whether they will be available on a full time, part time or casual basis).

3.6.4 Consistency amongst training and checking personnel is an important factor in the success of a training and checking system. However, the greater the number of training and checking personnel, the greater the risk of differing standards across the group.

3.6.5 Simple training and checking systems may only require the use of a standardisation proficiency check (SPC) conducted by the HOTC. Larger, or more complex, training and checking systems, in addition to an SPC, may track the scoring of checking events and compare those across the group of training and checking personnel to determine the level of inter-rater reliability.

3.6.6 Inter-rater reliability is defined by ICAO<sup>15</sup> as "The consistency or stability of scores between different raters." Put another way, it is the extent to which two or more raters (training and checking personnel) are likely to agree, and it addresses the issue of consistency of the implementation of a rating system such that:

- High inter-rater reliability values indicate a high degree of agreement between two or more training and checking personnel.
- Low inter-rater reliability values indicate a low degree of agreement between two or more training and checking personnel.

## 3.7 Training and checking organisational structure

3.7.1 The operator must<sup>16</sup> demonstrate that it has sufficient resources and capability, whether internal or external, to adequately conduct the training and checking activities. However, this does not mean that an operator is required to have redundancy in its training and checking staff or its key personnel. How much redundancy is held by the operator is an operator decision, made in the awareness by operators of the consequences of not being able to conduct training and checking activities in required timeframes.

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<sup>15</sup> See ICAO Doc 9995.

<sup>16</sup> Regulations 119.130 and 138.085 of CASR.

- 3.7.2 Properly supervising, managing and conducting training and checking activities in large, complex operators may require multiple layers of management, whereas very small, non-complex operators might only require a HOTC.
- 3.7.3 Some training and checking activities may be provided to the operator under a contractual arrangement. However, the obligation to maintain a training and checking system is always the responsibility of the operator.
- 3.7.4 For more larger and more complex operators, it may be useful to illustrate the managerial and supervisory positions involving in overseeing an operator's training and checking system by a diagram of the organisational structure.
- 3.7.5 If all or part of the training and/or checking activities are contracted to a third party, the operator's exposition or training and checking manual processes and procedures should illustrate or explain how, and by whom, the third party activities are oversighted.

### 3.8 Exposition or training and checking manual

- 3.8.1 These documents describe the WHAT, WHO, WHEN and HOW of the training and checking system.
- 3.8.2 The operator may choose to include all training and checking activities in one volume, or they may have multiple volumes covering different operational safety-critical personnel.
- 3.8.3 The following should be included in the documents<sup>17</sup>:
- training and checking system objectives
  - training and checking organisational structure
  - nominated and appointed training and checking personnel related information, such as:
    - o their duties and responsibilities
    - o their prerequisite qualifications and experience
    - o which training and checking activities they are permitted to conduct
    - o of training and checking personnel.
  - for each training or checking event, information such as:
    - o description of administrative processes
    - o syllabus
    - o course outline
    - o lesson plans
    - o methods of assessment used to grade the performance of operational safety-critical personnel
    - o procedures for the conduct of assessments (such as theory examinations and practical competency assessments), and managing knowledge deficiencies
    - o method for remediating unsatisfactory performance (whether knowledge or practical deficiencies)
    - o facilities or equipment used for the event, including describing when the facility or equipment is considered unserviceable for the event and how personnel report facility or equipment unserviceabilities.

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<sup>17</sup> Regulatory requirements for inclusions in a training and checking system are specified in regulations 119.170, 138.130 and 138.135 of CASR (as applicable to the operation).

- description of facilities and equipment to support training and checking activities, such as:
  - o location of facilities
  - o aircraft
  - o FSTD (including which activities can be conducted in an FSTD, any differences between an FSTD and the aircraft, and how differences will be managed from a competency assessment perspective) (see example below)
  - o cabin training devices and emergency exit trainers
  - o briefing and debriefing rooms
  - o CBT programs
  - o other training aids.
- training and checking records management<sup>18</sup>
- details of the management of the Part 142 organisation (or foreign equivalent) providing contracted training and/or contracted checking (if any), including:
  - o details of the individual conducting the training and checking
  - o what activities are covered by the contract
  - o the method used by the operator to oversight the contractor.
- system review and continuous improvement (quality assurance).

**Example (linked to the FSTD bullet point above)**

'FSTD A' located in Australia represents a different variant of a type to the specific aircraft used by the operator.

The operator would like to use 'FSTD A' for one of their annual proficiency checks.

The following differences are listed:

- 'FSTD A' has a L+C+R HYD SYS, whereas the aircraft has a L+R HYD SYS.
- 'FSTD A' has PW4000 engines with 63 000 lbs of thrust, whereas the aircraft has PW2040 engines with 40 100 lbs of thrust.
- All other systems are similar.

Based on the differences, the operator determines that:

- the HYD systems are too different to conduct effective training and checking activities involving hydraulic faults or failures
- a 20% derate on the PW4000 engine thrust produces similar performance to that of the PW2040-engined aircraft.

The operator therefore:

- records the outcome of this assessment into its lesson plans and list of suitable facilities to ensure that HYD system events are not conducted in FSTD A and
- requires one proficiency check in 'FSTD A' per annum, with a second proficiency check in 'FSTD B', which is qualified by a recognised foreign State, and based on the same variant as the operator's aircraft.

<sup>18</sup> Regulations 119.225, 119.230 and 138.170 of CASR.

- 3.8.4 If emergency and safety equipment training and checking is conducted in an aircraft, the operator is recommended to consider the following matters when designing their training and checking processes and procedures such that the aircraft will remain airworthy following the conclusion of the training and checking:
- If emergency and safety equipment is removed from its stowage position and used for training and checking activities, the operator should detail how that equipment will be handled safely and indicate who is responsible for ensuring the equipment is restowed and serviceable.
  - If emergency and safety equipment is removed from its stowage position and replaced with 'dummy' equipment, then an entry should be made in the aircraft technical log. Following the training and checking activity, the technical log must be certified once the equipment is correctly restowed and serviceable.
  - If emergency exits are operated, the procedures will need to ensure that the activity is conducted safely and with no damage to the aircraft.
  - Where escape slides/rafts can be armed for automatic deployment, the procedure will need to include how the system is made safe to prevent accidental deployment. In this instance, approved maintenance staff may need to be involved in deactivating and reactivating the system.

### **3.9 How to determine your training and checking system is working**

- 3.9.1 An essential element in any system is the measurement of system performance.
- 3.9.2 The exposition or training and checking manual must<sup>19</sup> detail how the operator ensures that the training and checking system is meeting their operational needs.
- 3.9.3 An operator's audit program should include the following elements:
- training and checking records capture and data analysis
  - effective communications protocols
  - procedures for review and revision of the exposition or training and checking manual
  - data management (sources, collection, storage, analysis, use)
  - feedback loops, for example, relationship between FDAP and SMS and revisions to training and checking policy and programs
  - facilities, for example, classrooms, CBT, FSTDs
  - training and checking of personnel such as checkers and check pilots
  - management of change processes
  - oversight of third-party training providers
  - organisational procedures such as meeting schedules, minutes, attendance lists, agenda management, record keeping.

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<sup>19</sup> Regulations 119.170, 138.130 and 138.135 of CASR.

## 4 Training and checking facilities

### 4.1 General

- 4.1.1 Training and checking activities may be conducted in aircraft, FSTDs, cabin training devices, emergency exit trainers, or any other device used for training and checking provided it is suitable for the purpose.
- 4.1.2 When selecting a device, the potential for negative training outcomes must be considered. An element of the ongoing suitability of a device is ensuring the device is maintained in good order.

### 4.2 Training and checking in an aircraft

- 4.2.1 Division 91.D.11 of CASR contains general rules relating to causing or simulator the failure of aircraft equipment during a flight. Some exemptions apply to the regulations within this Division. For specific exemption references, read the GM entries for these regulations in the Part 91 AMC/GM document which is available on the CASA website.
- 4.2.2 Specific rules relating to when a flight simulator must be used include the following:
- Regulation 91.745 of CASR limits which aeroplanes are permitted to be used for in-aircraft simulated engine failures for all operations.
  - Regulation 121.510 of CASR requires certain training and checking for a Part 121 operation to be conducted in an approved flight simulator.
  - Section 12.13 of the Part 133 MOS requires certain training and checking for a Part 133 operation to be conducted in an approved flight simulator.
- 4.2.3 Training and checking may be carried out on air transport flights provided the exposition supports the activity, no abnormal or emergency activities are conducted, and the flights are compliant with the regulations within Division 91.D.11 of CASR (regulations 91.715 to 91.775 inclusive), and regulation 121.510 of CASR. The trainer or checker must be pilot-in-command and will need to satisfy operator entry control, training and checking, and recency requirements such as non-command seat training and check requirements.
- 4.2.4 If the conditions in the previous paragraph are not met, then the flight must be operated under Part 91; no passengers may be carried.
- 4.2.5 Risks such as harm to personnel and damage to aircraft must be effectively mitigated by policies and procedures detailing the WHO, WHAT, and HOW for the conduct of training and checking activities.
- 4.2.6 The operator must consider the heightened risk associated with in-aircraft training and checking involving the following:
- inappropriate management of complex aircraft systems
  - conducting flight operations at low level (such as engine failures after take-off)
  - conducting operations at or near VTOSS, VMCA or VS0 with an engine inoperative
  - inadvertent mismanagement or errors
  - vortex ring state
  - over pitching.
  - asymmetric operations including:

- o inadequate pre-take-off planning and briefing
- o poor decision making
- o poor aircraft control
- o inadequate performance awareness and management
- o operations with feathered propellers
- o missed approaches and go-arounds
- o unstable final approach and landing
- performance states in the vicinity of stalling

4.2.7 Risk mitigation strategies are recommended to include detailed information for at least the following items:

- weather
- environmental conditions
- traffic
- task saturation
- fatigue
- who the handling pilot is and well-defined protocols for the transfer of control
- method by which a simulation is initiated (announcement, which control is moved etc.)
- operating restrictions, including minimum altitude/speed and aircraft configuration
- use of checklists and touch drills
- circumstances requiring termination of the activity.

4.2.8 For any proficiency checks conducted in an aircraft the operator must ensure that the training and checking personnel are trained in the competencies required to safely conduct the activity. The operator can achieve this by:

- ensuring that training and checking personnel hold the (valid) Part 61 qualifications required to conduct the activity
- or
- for personnel who do not hold the relevant Part 61 qualification, providing training to the person which enables the training and checking activities to be conducted at a safety level is at least equivalent to that achievable by a Part 61 qualified person.

4.2.9 Subpart 121.Z, Part 133, Part 135 and Part 138 operators (which also includes operators operating under a combination of Part 135 and the 10-13 seat exemption CASA EX97/22) who intend to train persons to conduct a training or checking event involving the conduct of non-normal exercises, without the person holding an appropriate Part 61 instructor or examiner rating, are required to hold an approval of the relevant aspects of their training and checking system<sup>20</sup>. Refer to Annex B for specific information on these matters.

4.2.10 The definition of a non-normal exercise is contained in the instruments referred to in the previous paragraph. This definition, and its supporting definition of *vital system*, is repeated below:

*non-normal exercise* means an aeroplane flight that involves the simulated failure of a vital system.

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<sup>20</sup> The requirement for an approval to be held is in section 20B of CASA EX84/21 (for Part 133 operators), section 20A of CASA EX85/21 (for Part 135 operators, Subpart 121.Z operators, CASA EX97/22 operators) and section 17 of CASA EX86/21 (for aerial work certificate holders).



*vital system* means a system whose simulated failure in flight would adversely affect the safety of the aeroplane as compared to normal operation.

## 4.3 Training and checking in a FSTD

4.3.1 The following rules specifically require some training and checking events to be conducted in an FSTD:

- Regulation 91.745 of CASR limits which aeroplanes are permitted to be used for in-aircraft simulated engine failures for all operations.
- Regulation 121.510 of CASR requires certain training and checking for a Part 121 operation to be conducted in an approved flight simulator.
- Section 12.13 of the Part 133 MOS requires certain training and checking for a Part 133 operation to be conducted in an approved flight simulator.

**Note:** Other rules in Division 91.D.11 of CASR relate to the simulation of equipment failures. These rules might also determine whether a training and checking activity can be conducted in an aircraft.

4.3.2 However, CASA encourages operators and aircraft owners to maximise their use of qualified FSTDs, as they are shown to improve the quality of training and checking activities.

4.3.3 An operator wishing to use an FSTD qualified under Part 60 of CASR to conduct training or checking activities will require approval under regulation 60.055.

4.3.4 An operator wishing to conduct training and checking in an FSTD qualified by a recognised foreign State, as defined by regulation 61.010, will need to provide CASA with a copy of the qualification certificate and include details of the device in their exposition or training and checking manual, and how the operator ensures the device continues to be qualified by the regulator of the foreign State.

4.3.5 AOC holders who purchase their own FSTD generally have the device mirror their specific fleet of aircraft, whereas FSTDs provided by third party simulator operators will be designed to mirror the original equipment manufacturer (OEM) standard or generic tail number (white tail aircraft).

4.3.6 Regardless of which country qualifies an FSTD, operators can expect CASA will seek to understand how the operator has determined that the FSTD is suitable to support their training and checking activities. FSTDs that are not suitable can result in 'negative training'. Operators are recommended to consider the following matters when assessing the suitability of an FSTD:

- significant differences between the operator's aircraft and the FSTD systems
- the design layout of the flight deck
- instrumentation package, i.e. Garmin vs. Proflight
- flight management computer software and functionality
- engine configuration and thrust
- availability of a suitable database to support training and checking.

4.3.7 In cases where the FSTD is **not qualified** for all activities, such as a device that is not qualified to adequately simulate the take-off or landing of the aircraft, the operator would need to conduct these elements of their training and checking activities in an aircraft.

## 4.4 Training devices that are not FSTDs

- 4.4.1 The effectiveness of crew member training and checking can be enhanced using cabin training devices, emergency exit trainers, underwater escape trainers, and fire-fighting training devices, etc.
- 4.4.2 Practical training in emergency and safety equipment may be conducted using representative training devices instead of the actual aircraft and equipment.
- 4.4.3 There is no formal approval process for the use of such devices.
- 4.4.4 Training and checking personnel who use the device need to be appropriately trained by the operator to use the devices.















## A.1 Example of grading system for regulation 61.040 approved systems

A.1.1 The example grading system has been adapted from ICAO Doc 9995, Manual of Evidence-based Training and IATA’s Evidence-based implementation guide. Although only some operators will plan to implement an EBT program, the grading system is a useful tool which provides a level of granularity to support a training and checking system approved under regulation 61.040. To be effective, training and checking personnel will require training in how to apply the grading system.

**Note:** Operators who do not require a regulation 61.040 approval for their training and checking system may still find the example useful.

A.1.2 Two examples of grading word pictures have been provided. The detailed grading word pictures in Table 1 use a 1 to 5 score which allows for granular data collection and analysis. The less detailed word pictures in Table 2 are suitable for a less complex training and checking systems or activities but still provide the level of standardisation required. Some operators may choose to have both the detailed and less detailed grading systems in place for different training and checking activities.

A.1.3 The grading word pictures in Tables 1 and 2 are supported by the behavioural indicators in Table 3. For each of the nine competencies there are a number of behavioural indicators that should be observed by the assessor. The assessor will observe what behaviours were present for each competency and assign a grade. Not all competencies need to be assessed for each event; the exercise being conducted will determine what competencies are assessed.

A.1.4 By adopting the detailed grading word pictures, (Table 1) the data collected would be suitable for use as the base line EBT implementation program as detailed in ICAO Doc 9995 Chapter 4 if the operator chooses to move to an EBT program in the future<sup>25</sup>.

**Table 1: Grading word pictures (detailed)**

1	2	3	4	5
<b>Ineffective performance, rarely demonstrating any</b> of the behavioural indicators when needed, which resulted in an <b>unacceptable reduction in safety margin.</b>	<b>Acceptable performance, occasionally demonstrating some</b> of the behavioural indicators when needed, resulting in a <b>safe operation.</b>	<b>Suitable performance, regularly demonstrating most</b> of the behavioural indicators when needed, <b>resulting in a safe operation.</b>	<b>Effective performance, regularly demonstrating the required</b> behavioural indicators when needed, <b>enhancing the safety margin.</b>	<b>Exemplary performance, always demonstrating the required</b> behavioural indicators when needed, which <b>significantly enhanced safety and efficiency.</b>

<sup>25</sup> Refer to ICAO Doc 9995 for guidance.











