

## ORA APPROVED TRAINING ORGANIZATION (ATO) COMPLIANCE CHECKLIST

<b>Organization:</b> <input style="width: 90%;" type="text"/>	<b>Approval Ref.:</b> <input style="width: 90%;" type="text"/>
<b>Location:</b> <input style="width: 100%;" type="text"/>	
<b>Inspection Type:</b> <input style="width: 50%;" type="text"/>	<b>Inspection Date:</b> <input style="width: 50%;" type="text"/>

MANAGEMENT SYSTEM DOCUMENTATION	Content	Reference
<b>ACCOUNTABILITY</b>	Clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager.	<b>ORA.GEN.200(a)(1)</b>
<b>SAFETY POLICY</b>	Description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy.	<b>ORA.GEN.200(a)(2)</b>
<b>SAFETY MANAGEMENT RISK</b>	The identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness	<b>ORA.GEN.200(a)(3)</b>
<b>TRAINING AND COMMUNICATION ON SAFETY</b>	Maintaining personnel trained and competent to perform their tasks.	<b>ORA.GEN.200(a)(4)</b>
<b>MANAGEMENT SYSTEM DOCUMENTATION</b>	Documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation.	<b>ORA.GEN.200(a)(5)</b>
<b>SAFETY MANAGEMENT MANUAL</b>		<b>ORA.GEN.200(a)(5)</b>
<b>COMPLIANCE MONITORING MANUAL</b>	Function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary.	<b>ORA.GEN.200(a)(6)</b>

ACCOUNTABILITY	Content	Reference	SAT	USAT
Safety manager	The safety manager should act as the focal point and be responsible for the development, administration and maintenance of an effective safety management system.			
	The functions of the safety manager should be to: (i) facilitate hazard identification, risk analysis and management; (ii) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan; (iii) provide periodic reports on safety performance; (iv) ensure maintenance of safety management documentation; (v) ensure that there is safety management training available and that it meets acceptable standards; (vi) provide advice on safety matters; and (vii) ensure initiation and follow-up of internal occurrence / accident investigations.			
	<i>Depending on the size of the organisation and the nature and complexity of its activities, the safety manager may be assisted by additional safety personnel for the performance of all safety management related tasks.</i>  <i>Regardless of the organisational set-up it is important that the safety manager remains the unique focal point as regards the development, administration and maintenance of the organisation's safety management system.</i>			
Safety review board	The Safety review board should be a high level committee that considers matters of strategic safety in support of the accountable manager's safety accountability.			
	The board should be chaired by the accountable manager and be composed of heads of functional areas.			
	The safety review board should monitor: (i) safety performance against the safety policy and objectives; (ii) that any safety action is taken in a timely manner; and (iii) the effectiveness of the organisation's safety management processes.			

	<p>The safety review board should ensure that appropriate resources are allocated to achieve the established safety performance.</p>			
	<p>The safety manager or any other relevant person may attend, as appropriate, safety review board meetings. He/she may communicate to the accountable manager all information, as necessary, to allow decision making based on safety data.</p>			
<b>SAFETY ACTION GROUP</b>	<p>A safety action group may be established as a standing group or as an ad-hoc group to assist or act on behalf of the safety review board.</p> <p>More than one safety action group may be established depending on the scope of the task and specific expertise required.</p> <p>The safety action group should report to and take strategic direction from the safety review board and should be comprised of managers, supervisors and personnel from operational areas.</p> <p>The safety action group should review the effectiveness of previous safety recommendations and safety promotion.</p>			
	<p>The safety action group should:</p> <ol style="list-style-type: none"> <li>(1) monitor operational safety;</li> <li>(2) resolve identified risks;</li> <li>(3) assess the impact on safety of operational changes; and</li> <li>(4) ensure that safety actions are implemented within agreed timescales.</li> </ol>			

<b>SAFETY POLICY</b>	<b>Content</b>	<b>Reference</b>	<b>SAT</b>	<b>USAT</b>
<b>Safety Policy</b>	<p>The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident as far as is reasonably practicable.</p> <p>The safety policy should state that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals.</p>			

	<p>The safety policy should:</p> <ol style="list-style-type: none"> <li>(1) be endorsed by the accountable manager;</li> <li>(2) reflect organisational commitments regarding safety and its proactive and systematic management;</li> <li>(3) be communicated, with visible endorsement, throughout the organisation; and</li> <li>(4) include safety reporting principles.</li> </ol>			
	<p>The safety policy should include a commitment:</p> <ol style="list-style-type: none"> <li>(1) to improve towards the highest safety standards;</li> <li>(2) to comply with all applicable legislation, meet all applicable standards and consider best practices;</li> <li>(3) to provide appropriate resources;</li> <li>(4) to enforce safety as one primary responsibility of all managers; and</li> <li>(5) not to blame someone for reporting something which would not have been otherwise detected.</li> </ol>			
	<p>Senior management should:</p> <ol style="list-style-type: none"> <li>(1) continually promote the safety policy to all personnel and demonstrate their commitment to it;</li> <li>(2) provide necessary human and financial resources for its implementation; and</li> <li>(3) establish safety objectives and performance standards.</li> </ol>			

SAFETY RISK MANAGEMENT	Content	Reference	SAT	USAT
<p><b>Hazard identification processes</b></p>	<p>Reactive and proactive schemes for hazard identification should be the formal means of collecting, recording, analysing, acting on and generating feedback about hazards and the associated risks that affect the safety of the operational activities of the organisation</p>			

	All reporting systems, including confidential reporting schemes, should include an effective feedback process.			
<b>Risk assessment and mitigation processes</b>	A formal risk management process should be developed and maintained that ensures analysis (in terms of likelihood and severity of occurrence), assessment (in terms of tolerability) and control (in terms of mitigation) of risks to an acceptable level.			
	The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (b)(1), should be specified.			
<b>Internal safety investigation</b>	The scope of internal safety investigations should extend beyond the scope of occurrences required to be reported to the competent authority.			
<b>Safety performance monitoring and measurement</b>	Safety performance monitoring and measurement should be the process by which the safety performance of the organisation is verified in comparison to the safety policy and objectives.			
	<p>This process should include:</p> <p>(i) safety reporting;</p> <p>(ii) safety studies, that is, rather large analyses encompassing broad safety concerns;</p> <p>(iii) safety reviews including trends reviews, which would be conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of structural change in operations;</p> <p>(iv) safety audits focussing on the integrity of the organisation's management system, and periodically assessing the status of safety risk controls; and</p> <p>(v) safety surveys, examining particular elements or procedures of a specific operation, such as problem areas or bottlenecks in daily operations, perceptions and opinions of operational personnel and areas of dissent or confusion.</p>			

<p><b>The management of change</b></p>	<p>The organisation should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the organisation's existing hazard identification, risk assessment and mitigation processes.</p>			
<p><b>Continuous improvement</b></p>	<p>The organisation should continuously seek to improve its safety performance.</p> <p>Continuous improvement should be achieved through:</p> <p>(1) proactive and reactive evaluations of facilities, equipment, documentation and procedures through safety audits and surveys;</p> <p>(2) proactive evaluation of individuals' performance to verify the fulfilment of their safety responsibilities; and</p> <p>(3) reactive evaluations in order to verify the effectiveness of the system for control and mitigation of risk.</p>			
<p><b>The emergency response plan (ERP)</b></p>	<p>An ERP should be established that provides the actions to be taken by the organisation or specified individuals in an emergency. The ERP should reflect the size, nature and complexity of the activities performed by the organisation.</p> <p>The ERP should ensure:</p> <p>(i) an orderly and safe transition from normal to emergency operations;</p> <p>(ii) safe continuation of operations or return to normal operations as soon as practicable; and</p> <p>(iii) coordination with the emergency response plans of other organisations, where appropriate.</p>			
<p><b>Internal occurrence reporting scheme</b></p>	<p>The overall purpose of the scheme is to use reported information to improve the level of safety performance of the organisation and not to attribute blame.</p> <p>The objectives of the scheme are to:</p> <p>(1) enable an assessment to be made of the safety implications of each relevant incident and accident, including previous similar occurrences, so that any necessary action can be initiated; and</p>			

	(2) ensure that knowledge of relevant incidents and accidents is disseminated, so that other persons and organisations may learn from them.			
	<p>The scheme is an essential part of the overall monitoring function and it is complementary to the normal day-to-day procedures and 'control' systems and is not intended to duplicate or supersede any of them. The scheme is a tool to identify those instances where routine procedures have failed.</p> <p>All occurrence reports judged reportable by the person submitting the report should be retained as the significance of such reports may only become obvious at a later date.</p>			

TRAINING AND COMMUNICATION ON SAFETY	Content	Reference	SAT	USAT
Training	All personnel should receive safety training as appropriate for their safety responsibilities.			
	Adequate records of all safety training provided should be kept.			
Communication	<p>The organisation should establish communication about safety matters that:</p> <p>(i) ensures that all personnel are aware of the safety management activities as appropriate for their safety responsibilities;</p> <p>(ii) conveys safety critical information, especially relating to assessed risks and analysed hazards;</p> <p>(iii) explains why particular actions are taken; and</p> <p>(iv) explains why safety procedures are introduced or changed.</p>			
	Regular meetings with personnel where information, actions and procedures are discussed may be used to communicate safety matters.			
	The safety training programme may consist of self-instruction via a media (newsletters, flight safety magazines), class-room training, e-learning or similar training provided by training service providers.			

MANAGEMENT SYSTEM DOCUMENTATION	Content	Reference	SAT	USAT
<b>Management System Documentation</b>	The organisation's management system documentation should at least include the following information:			
	(i) a statement signed by the accountable manager to confirm that the organisation will continuously work in accordance with the applicable requirements and the organisation's documentation as required by this Part;			
	(ii) the organisation's scope of activities;			
	(iii) the titles and names of persons referred to in ORA.GEN.210 (a) and (b);			
	(iv) an organisation chart showing the lines of responsibility between the persons referred to in ORA.GEN.210;			
	(v) procedures specifying how the organisation ensures compliance with the applicable requirements;			
	(vi) the amendment procedure for the organisation's management system documentation.			
	<p>The organisation's management system documentation may be included in a separate manual or in (one of) the manual(s) as required by the applicable Subpart(s). A cross reference should be included. It is not required to duplicate information in several manuals.</p> <p>The information may be contained in any of the organisation manuals (e.g. operations manual, training manual), which may also be combined.</p> <p>The organisation may also choose to document some of the information required to be documented in separate documents (e.g. procedures). In this case, it should ensure that manuals contain adequate references to any document kept separately. Any such documents are then to be considered an integral part of the organisation's management system documentation.</p>			



SAFETY MANAGEMENT MANUAL	Content	Reference	SAT	USAT
Management System Documentation	<p>The safety management manual (SMM) should be the key instrument for communicating the approach to safety for the whole of the organisation. The SMM should document all aspects of safety management, including the safety policy, objectives, procedures and individual safety responsibilities.</p>			
	<p>The contents of the safety management manual should include all of the following:</p> <ol style="list-style-type: none"> <li>(1) scope of the safety management system;</li> <li>(2) safety policy and objectives;</li> <li>(3) safety accountability of the accountable manager;</li> <li>(4) safety responsibilities of key safety personnel;</li> <li>(5) documentation control procedures;</li> <li>(6) hazard identification and risk management schemes;</li> <li>(7) safety action planning;</li> <li>(8) safety performance monitoring;</li> <li>(9) incident investigation and reporting;</li> <li>(10) emergency response planning;</li> <li>(11) management of change (including organisational changes with regard to safety responsibilities);</li> <li>(12) safety promotion.</li> </ol> <p>The SMM may be contained in (one of) the manual(s) of the organisation.</p>			
COMPLIANCE MONITORING	Content	Reference	SAT	USAT
Compliance monitoring	<p>The implementation and use of a compliance monitoring function should enable the organisation to monitor compliance with the relevant requirements of this Part and other applicable Parts</p>			
	<p>The organisation should specify the basic structure of the compliance monitoring function applicable to the activities conducted.</p>			
	<p>The compliance monitoring function should be structured according to the size of the organisation and the complexity of the activities to be monitored.</p>			

	<p>The organisational set-up of the compliance monitoring function should reflect the size of the organisation and the nature and complexity of its activities. The compliance monitoring manager may perform all audits and inspections himself/herself or appoint one or more auditors by choosing personnel having the related competence as defined in AMC1 ORA.GEN.200(a)(6) point (c)(3)(iii), either from within or outside the organisation.</p> <p>Regardless of the option chosen it must be ensured that the independence of the audit function is not affected, in particular in cases where those performing the audit or inspection are also responsible for other functions within the organisation.</p> <p>In case external personnel are used to perform compliance audits or inspections:</p> <p>(1) any such audits or inspections are performed under the responsibility of the compliance monitoring manager; and</p> <p>(2) the organisation remains responsible to ensure that the external personnel has relevant knowledge, background and experience as appropriate to the activities being audited or inspected; including knowledge and experience in compliance monitoring.</p> <p>The organisation retains the ultimate responsibility for the effectiveness of the compliance monitoring function in particular for the effective implementation and follow-up of all corrective actions.</p>			
	<p>Organisation should monitor compliance with the procedures they have designed to ensure safe activities. In doing so, they should as a minimum, and where appropriate, monitor:</p> <p>(1) privileges of the organisation;</p> <p>(2) manuals, logs, and records;</p> <p>(3) training standards;</p> <p>(4) management system procedures and manuals.</p>			
<p><b>Organizational set up</b></p>	<p>To ensure that the organisation continues to meet the requirements of this Part and other applicable Parts, the accountable manager should designate a compliance monitoring manager. The role of the compliance monitoring manager is to ensure that the activities of the organisation are monitored for compliance with the applicable regulatory requirements, and any additional requirements as established by the organisation, and that these activities are being carried out properly under the supervision of the relevant head of functional area.</p>			

	<p>The compliance monitoring manager should be responsible for ensuring that the compliance monitoring programme is properly implemented, maintained and continually reviewed and improved.</p>			
	<p>The compliance monitoring manager should:</p> <p>(i) have direct access to the accountable manager;</p> <p>(ii) not be one of the other persons referred to in ORA.GEN.210 (b);</p> <p>(iii) be able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the organisation; including knowledge and experience in compliance monitoring; and</p> <p>(iv) have access to all parts of the organisation, and as necessary, any contracted organisation.</p>			
	<p>In the case the same person acts as compliance monitoring manager and as safety manager, the accountable manager, with regards to his/her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the organisation and the nature and complexity of its activities.</p>			
	<p>The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure or products being audited.</p>			
<b>Compliance monitoring documentation</b>	<p>Relevant documentation should include the relevant part(s) of the organisation's management system documentation.</p>			
	<p>In addition, relevant documentation should also include the following:</p> <p>(i) terminology;</p> <p>(ii) specified activity standards;</p> <p>(iii) a description of the organisation;</p> <p>(iv) the allocation of duties and responsibilities;</p> <p>(v) procedures to ensure regulatory compliance;</p> <p>(vi) the compliance monitoring programme, reflecting:</p> <p>(A) schedule of the monitoring programme;</p> <p>(B) audit procedures;</p> <p>(C) reporting procedures;</p> <p>(D) follow-up and corrective action procedures; and</p> <p>(E) recording system.</p> <p>(vii) the training syllabus referred to in (e)(2);</p> <p>(viii) document control.</p>			

<b>Training</b>	Correct and thorough training is essential to optimise compliance in every organisation. In order to achieve significant outcomes of such training, the organisation should ensure that all personnel understand the objectives as laid down in the organisation's management system documentation.			
	Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting and recording.			
	Time should be provided to train all personnel involved in compliance management and for briefing the remainder of the personnel.			
	The allocation of time and resources should be governed by the volume and complexity of the activities concerned.			

**Additional remarks/Comments**

**OVERALL RESULT:**

**Approved**

**Rejected**

**DGCA/ASD Inspector  
Name & Signature:**

**Date:**

**Head of Personnel Licensing  
Name & Signature:**

**Date:**