PART 1

PART-ORA
APPROVED TRAINING ORGANISATION MANUAL

Though the existing EASA regulatory framework ceases to apply, all substantive EU requirements current and valid on 31 December 2020 have been retained in UK domestic regulation. All EASA certificates, approvals and licences in effect on 31 December 2020 for use in the UK aviation system and on UK-registered aircraft will be recognised by the CAA for up to two years.

This document supports the European Union
PART-ORA Approved Training Organisation Approval of:

Andrewsfield Aviation Limited
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**PART-ORA APPROVAL
REFERENCE
GBR.ATO-0113**

FOREWORD

This manual has been prepared in order to support **ANDREWSFIELD AVIATION LTD (Principle) and its Satellite at NAPLES AIR CENTER Florida** PART-ORA Approved Training Organisation Approval. This document is divided into three parts.

PART 1   **MANAGEMENT ORGANISATION**
                                COMPLIANCE MONITORING
                                SAFETY MANAGEMENT SYSTEM

PART 2   **OPERATIONS MANUAL**

PART 3   **COMBINED TRAINING MANUAL**

Manual Amendment Process for this Manual:

Amendments must be submitted by any staff member using the letter of transmittal on page 5 of this document.
.
Order of Process

1. Letter of Transmittal – Presented to Accountable Manager for Approval
2. Letter of Transmittal – (if approved) if applicable Sent to CAA by AM
3. List of Effected Pages – updated by Accountable Manager or delegate
4. Record of Amendments- updated by Accountable Manager or delegate

The Accountable Manager is responsible for authorising, issuing and maintaining these documents. The Accountable Manager is also responsible for co-ordinating Function and Local documentation to minimise repetition. authorising, issuing and maintaining these documents.

All documentation in this manual will be controlled documents and will be given.
- a unique reference number found on the Letter of Transmittal,
- Documents are stored in electronic form.
- Only the Accountable Manager, or nominated delegates, have write access and therefore control. Which includes updating and amending List of effective pages
- Any other printouts of this documentation will be uncontrolled copies and cannot be treated as an up-to date version.

 All letters of transmittal-controlled documentation shall contain the following:
- A unique Reference No-Date of When Removed -Date of when inserted,
- A title briefly describing the document. Amendment
- Changes will show a vertical line adjacent to the change
- List of Effective Pages will be used as reference to identify where changes have been made

Staff that use these documents are responsible for ensuring they are familiar with the latest version of them.

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                COMPLIANCE MONITORING
                SAFETY MANAGEMENT SYSTEM**

PART 2   OPERATIONS MANUAL

PART 3   COMBINED TRAINING MANUAL

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29	Version 5				

Letter of Transmittal

Date: …………………….

For Manual /Amendment* Approval

Document Ref. No: ……

Original Issue*
Amendment Revision No: * ……….

Ref. [*page no*]	Remove	Insert	Brief Details of Amendment

Approved By:

Compliance Manager
Part-ORA *ANDREWSFIELD AVIATION LTD/NAPLES AIR CENTRE*.

Date:

* Delete as required

FOR UK CAA USE ONLY
Approved By:

For the UK Civil Aviation Authority:

Date:

Following investigation and approval by the UK CAA, a signed & stamped copy of this page shall be returned to the Part-ORA ANDREWSFIELD AVIATION LTD. **for inclusion in all copies held by the company.**

DOCUMENT AMENDMENT RECORD

Version No	Date	Date Embodied	Signature
Updates			
1	28 July 2014	28 July 2014	MPR
2	1 Sept 2014	1 Sept 2014	MPR
3	1 Mar 2020	1 Mar 2020	MPR
4	1 Jan 2021	1 Jan 2021	MPR
5	1 Jan 2024	1 Jan 2024	MPR
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DOCUMENT DISTRIBUTION LIST

Accountable Manager (Electronic)		Carol Cooper
Deputy Accountable Manager (NAC) (Electronic)		Richard Gentil
Compliance Manager	(Electronic)	Neil Boniface (AAL)
		Michael Rowland (NAC)
Deputy Compliance Manager		Danielle Clarke (NAC)
Safety Manager	(Electronic)	Mike Rowland
Deputy Safety Manager	(Electronic)	Richard Gentil
Head of Training/CFI	(Electronic)	Carol Cooper
Head of Training/CFI	(Electronic)	Carol Cooper (NAC)
Administration	(Hard Copy)	Mike Hemes (AAL)
		Scott Williams
UK CAA	(Electronic)	
Main Office	(Hard Copy)	Andrewsfield &
		Naples Air Centre

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CORPORATE COMMITMENT BY THE ACCOUNTABLE MANAGER

<u>PART-ORA Approved Training Organisation Manual – BREXIT DEC 31 2021</u>

This document defines the organisation and procedures upon which the UK CAA PART-ORA Training approval is based updated in accordance with UK CAA guidelines of continued approval under UK CAA National Authority

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published by UK CAA from time to time where these new or amended regulations are in conflict with past EASA procedures.

It is understood that the UK CAA will approve this organisation whilst satisfied that the procedures are being followed. It is understood that the UK CAA reserves the right, provisionally or substantively, to suspend, vary or revoke the PART-ORA approval, as applicable, if the UK CAA has reasonable cause to believe that the procedures are not being followed and / or the standards not being upheld.

These procedures are approved by the undersigned and must be complied with, as applicable, whenever training is being delivered under the terms of the PART-ORA approval.

The undersigned fully accepts the duties and responsibilities of Accountable Manager as defined in ORA.GEN.210.

Signed: ………………………………………………………………………

Accountable Manager: Carol Cooper

For and on behalf of: *Andrewsfield Aviation Ltd*

ANDREWSFIELD AVIATION LTD
Organisation Management

Though the existing EASA regulatory framework ceases to apply, all substantive EU requirements current and valid on 31 December 2020 have been retained in UK domestic regulation. All EASA certificates, approvals and licences in effect on 31 December 2020 for use in the UK aviation system and on UK-registered aircraft will be recognised by the CAA for up to two years.

- Management Procedures
- Compliance Monitoring
- Safety Management

1   Management Procedures

This manual is to ensure that the Company comply with regulations and requirements set out in ORA.GEN.115(b) the Company shall provide the competent authority with documentation demonstrating how we comply with the requirements established in Regulation (EC) No.216/2008 and its implementing rules. Most of these requirements are addressed already by the Operations l Aerodrome Manual and the Combined Training Manual(s). The purpose of this document is to demonstrate how we comply with those applicable requirements that are not already addressed in other documents.

1.1   Authority and Applicability

The Andrewsfield Aviation Ltd ATO Organisation Management Manual (OMM) is issued in accordance with Commission Regulation (EU) 1178/2011. It complies with AMC1 ORA.GEN.200

This manual shall be made available to all ATO staff.

1.2   Structure

The Organisation Management Manual is structured as follows:

PART	TITLE	CONTENTS
1	Management Procedures	Describes the management procedures to comply with those applicable requirements of Part-ORA that are not included in the Opertaions Manual or Training Manuals
2	Compliance Monitoring	Describes the compliance monitoring function of the management system and demonstrates compliance with ORA.GEN.200(6)
3	Safety Management	Describes the safety management procedures of the ATO and demonstrates compliance with ORA.GEN.200(1), (2) and (3)

1.2.1   Scope of Training

1.2.1.1   The following training courses are provided:

Andrewsfield (Principle)

- LAPL,PPL,NIGHT,IMC(IR(R),AEROBATIC,CPL,FI,PPL FE, MULTI

NAC

- LAPL,PPL,CPL,NIGHT,IMC(IRI(R),MULTI,FI

1.2.2   Personnel

The titles and names of persons referred to in ORA.GEN.210(a) and (b) are as follows:

ORA.GEN.210 Post	Name
* Accountable Manager/CFI/Head of Training	Carol Cooper
*Deputy Accountable Manager/Deputy CFI/Head of Training (NAC)	Richard Gentil (NAC) Robert Gardner (AAL)
Compliance Monitoring Manager	**Neil Boniface (AAL) Michael Rowland (NAC)
Deputy Compliance Monitoring Manager (NAC)	**Danielle Clarke
* Safety Manager	Mike Rowland
*Deputy Safety Manager (NAC)	Richard Gentil

*Indicates roles can be combined ** Independent Auditors

1.2.3   Organisation Chart

The Organisation Chart form part of the Operations Manual

1.2.3.1   Accountable Manager (AAL Principle) /Deputy Accountable Manager (NAC)

The Accountable Manager (AAL)/Deputy Accountable Manager (NAC) is responsible to the Board of Directors, their responsibilities include but not confined to the following.

- Establishing and maintaining an effective management system
- Ensuring that the Organisation has sufficient qualified personnel for the planned tasks and activities
- Promoting the highest degree of safety awareness throughout the Organisation
- Ensuring that all activities can be financed

Safety Manager (AAL Principle) /Deputy Safety Manager (NAC)

- The Safety Manager (AAL)/Deputy Safety Manager (NAC) report to the Accountable Managers and are responsible for safety and for the safe management of the operational services and systems planned, provided and operated by Andrewsfield Aviation Ltd/NAC and must be suitably qualified.
- Safety Accountabilities.
- To ensure the airfields business plan is sufficiently resourced to enable the success of the safety policy.
- To take a leadership role in the airfields safety programme and ensure that safety does not become subordinate to financial matters.
- To appoint competent and safety conscious managers to ensure that safety is given a high priority.
- To ensure that best practice rules and procedures are agreed and implemented
- To ensure that full consideration is given to safety requirements during changes in business or operational procedures.

- To set high level safety target and objectives and monitor achievements.

Compliance Monitoring Manager (AAL Principle)/Deputy Compliance Monitoring Manager (NAC)

Using the guidelines set out in this document to carry out audits

- Verify that all students and rules are being complied with
- Ensure that the company are compliant to the Audit program in this document
- Implement improvements as necessary
- Deputy is carrying out the responsibilities at NAC and report to CMM

Safety Review Board/Safety Action Group

Due to the size of the organisation the roles of the Safety Review Board and Safety Action Group are performed by the same members

All Board/Group meeting will be chaired by the Accountable Manager (AAL Meetings) Deputy Accountable Manager(NAC Meetings)

Andrewsfield Board	Naples Air Centre Board
*Accountable Manager (AAL)	*Deputy Accountable Manager (NAC).
*Safety Manager (AAL)	*Deputy Safety Manager (NAC)
*Compliance Monitor Manager (AAL)	*Deputy Compliance Monitor Manager (NAC)
Instructor (NAC)	Instructor(NAC)

*Mandatory

The SRB monitors:

    (a) safety performance against the safety policy and objectives.

    (b) effectiveness of the SMS implementation plan;

    (c) effectiveness of the safety oversight of sub-contracted organisations;

    (d) that necessary corrective or mitigating actions are being taken in a timely manner; and

    (e) effectiveness of the organisation's safety management processes.

The safety action group:

    (a) oversees operational safety;

    (b) resolves identified risks;

    (c) assesses the impact on safety of operational changes;

    (d) implements corrective action plans; and

    (e) ensures that corrective action is achieved within agreed timescales.

1.2.4   Facilities

Description of facilities:

Andrewsfield provides training for the LAPL, PPL, SPL OR BPL and associated certificates.

Principle Site 1 (Andrewsfield)

This Site is located at:

Saling Airfield, Stebbing,Dunmow, Essex CM6 3TH

(a) The following flight operations accommodation is available:

(1) a flight planning room with the following facilities:

(i) Appropriate current aviation maps and charts available from Ops Office

(ii) current AIS information available from the members computer

(iii) current meteorological information available from the operations notice board and from the members computer

(iv) Communications to ATC (if applicable);

(v) any other flight safety related material.

(2) adequate briefing room(s)/cubicles of sufficient size and number;

(3) suitable office(s) to allow flight instructors to write reports on students, complete records and other related documentation;

(4) suitable rest areas for instructors and students, where appropriate to the training task;

(b) The following facilities for theoretical knowledge instruction are available:

(1) adequate classroom accommodation for the current student population;

(2) suitable demonstration equipment to support the theoretical knowledge instruction;

(3) suitable office(s) for the instructional personnel.

(c) A single room may be sufficient to provide the functions listed in (a) and (b)

Site 2 (Naples Air Centre)

This Site is located at:

Naples Air Center, Inc., 240 Aviation Drive North, Naples, FL 34104 USA

(a) The following flight operations accommodation is available:

(1) Operations Room

(2) Flight Planning Room including access to:

    I.   Internet for filing of flight plans, current aeronautical service information

    II.   Weather Services International (WSI) for current metrological information

    III.   Communications to Flight Service Station

    IV.   Appropriate current maps and charts

    V.   Weight and Balance data material

    VI.   Any other flight safety related material

(3) Adequate briefing room(s)/cubicles of sufficient size and number;

(4) Suitable office(s) to allow flight instructors to write reports on students, complete records and other related documentation;

(5) Suitable rest areas for instructors and students, where appropriate to the training task;

(b) The following facilities for theoretical knowledge instruction are available:

(1) Adequate classroom accommodation for the current student population;

(2) Suitable demonstration equipment to support the theoretical knowledge instruction;

(3) Suitable office(s) for the instructional personnel.

(c) A single room may be sufficient to provide the functions listed in (a) and (b)

1.2.5 Notification of changes to Organisations activities
ORA.GEN.115(a); ORA.GEN 130

1.2.5.1   Any change to the Organisations activities, the scope of approval (locations where training takes place or courses), or any element of the management system, as detailed in GM1 ORA.GEN.130(a), requires the prior approval of the competent authority before the changes are implemented.

1.2.5.2   Applications for the amendment of the approval certificate are to be made prior to the commencement of any change, and accompanied by all necessary supporting documentation. In the case of a planned change of a nominated person, this should be notified to the competent authority as soon as practicable.

1.2.5.3   Unforeseen changes must be notified to the competent authority at the earliest opportunity.

1.2.6 Changes not Requiring Prior Approval

1.2.6.1   Changes to the organisation that do not require prior approval by the competent authority are to be made only when agreed with the Accountable Manager. Changes are to be fully documented prior to implementation and in accordance with the Organisation's document control procedures.

1.2.6.2   The competent authority is to be notified of changes not requiring prior approval as soon as practicable. Notification is to be accompanied by all relevant documentation.

1.2.7 Terms of Approval

Not applicable.

1.2.8 Continued Validity

The ATO approval certificate remains valid subject to the Organisation remaining in compliance with the relevant requirements and the certificate not being revoked or surrendered.

1.2.9 Access by the Competent Authority

Representatives of the CAA are to be given access to all the Organisation's facilities, aircraft, documentation, records, data, procedures or any other material relevant to its approved activities.

1.2.10 Staff Training

1.2.10.1   All personnel will be trained, and their competence assessed to perform their tasks. Staff training is the responsibility of Mike Rowland as Safety Manager & Airfield Manager who is responsible for maintaining records of all training accomplished and will be responsible for training.

1.2.10.2   Procedures for the training of instructional staff are detailed in Part 4 of the ATO Operations Manual. Training will include organisations SMS, Safety Policy, Reporting Process, individual safety responsibilities, Safety documentation

1.2.10.3   All Staff are to be made aware and trained in compliance monitoring this training is part of the induction training given to all staff on employment and are to sign as having read and understood the contents (the signature sheets for each part of the manual are kept at the end of that part)

1.2.11   Contracted Activities

1.2.11.1   Some elements of the ATO's activities may be contracted out to other organisations, whether they are independently certified to perform the activities. In all cases, responsibility for the activity remains with the ATO.

1.2.11.2   It is the responsibility of the Accountable Manager, through the ATO's compliance monitoring system, to ensure that the contracted service or product remains in compliance with the applicable requirements.

1.2.11.3   All sub-contracting is to be subject to written terms and conditions and the lines of responsibility within and between organisations are to be clear and unequivocal

1.2.11.4   In the case of contracting organisations that are not independently approved under Part-ORA to carry out the contracted activity, the CAA must be given access to the contracted organisation.

1.2.12   Dissemination of Information

1.2.12.1   All personnel are to be aware of the rules and procedures relevant to the exercise of their duties.

1.2.12.2   The Head of Training is responsible for ensuring that all staff are aware of the contents of the relevant publications.

1.2.12.3   Signature sheets which are kept at the end of each relevant part of the Manual, are to be maintained for each Part, and personnel are to certify their knowledge and understanding.

Document	Signature(s) Required
Operations Manual	All flight instructors and students before first acting as PIC of an ATO aeroplane and thereafter at every amendment.
Training Manuals	All instructors before first giving instruction on the relevant course and thereafter at each amendment.
Organisation/Comp/SMS Management Manual	All staff on first taking up employment and thereafter at each amendment.

1.2.13   Licensing Records

The Head of Training and Deputy Head of Training are responsible for maintaining accurate and up to date information on student licences and associated ratings and certificates, including the expiry dates of medical certificates and language proficiency. The procedures detailing how these records are managed and retained are described in the Combined Training Manual

1.2.14   Training Aircraft

The Accountable Manager (AAL) and Deputy Accountable Manager (NAC) are responsible for maintaining an adequate fleet of aircraft suitably equipped for the approved courses. Details of current fleet and course suitability are listed in the Operations Manual Section 5.1

1.2.15   Aerodromes

The Head of Training is to ensure that all aerodromes nominated for training meet the requirements of AMC1 ORA.ATO.140. A list of some suitable aerodromes for land always can be found in the operations manual. Any other aerodromes must be approved by the head of Training or deputy Head of Training.

1.2.16   Personnel Requirements

Personnel appointed to instructional positions within the ATO must meet the following minimum requirements:

Position	Requirements
Head of Training/Deputy Head of Training	Have extensive experience in training as an instructor in the areas relevant to the training provided.
Flight Instructors	Hold at least the licence and, where relevant, the rating for which instruction is to be given. Be entitled to act as PIC on the aircraft during flight instruction. Hold a FI(A) certificate issued in accordance with Part-FCL

A list of instructors and their qualifications can be found in the Operations Manual Section 5
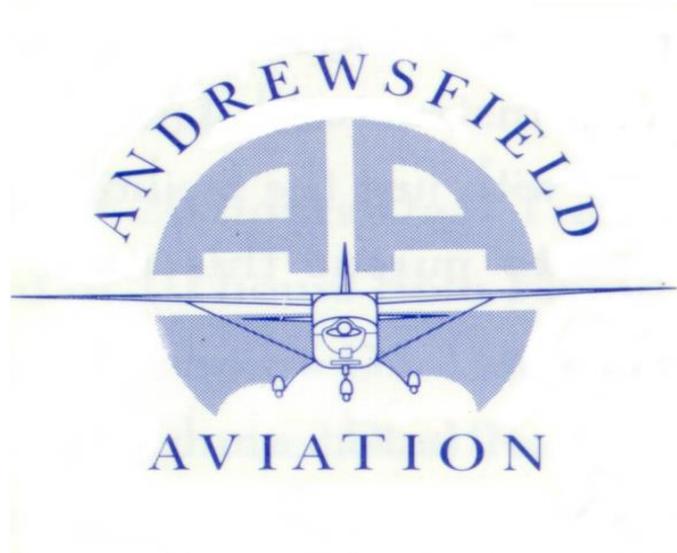
Compliance Manual

Though the existing EASA regulatory framework ceases to apply, all substantive EU requirements current and valid on 31 December 2020 have been retained in UK domestic regulation. All EASA certificates, approvals and licences in effect on 31 December 2020 for use in the UK aviation system and on UK-registered aircraft will be recognised by the CAA for up to two years.

Compliance Monitoring System

CONTENTS

COMPLIANCE MONITORING SYSTEM

Introduction

2.1   Andrewsfield Aviation Ltd is to establish a compliance monitoring system whereby it can monitor its activities, be able to detect deviations from set rules and standards, take the necessary corrective actions and thus ensure compliance with regulatory authorities and its own requirements.

The Compliance Monitoring System will make it possible for a supervising authority to perform inspections and surveillance efficiently and with a reasonable amount of resources.

2.2.1 Compliance Monitoring Policy

Andrewsfield Aviation Ltd /NAC Compliance Monitoring Policy is to produce competent and safe pilots by providing efficient and cost-effective training in a satisfactory learning environment, in order to achieve the standards in flying required to satisfy licence and rating provisions.

Training is conducted in compliance with the provisions in all relevant requirements of Regulation EU 216/2008 and its implementing rules including:

(a)   Relevant national legislation as detailed in the Air Navigation Order

(b)   ATO procedures as defined in:

  i.The Organisation Management manual

  ii.The ATO Operations Manual

  iii.The Training Manual(s) for the course(s) provided

(c)   Any other regulatory requirements to which the ATO is subject.

2.2.2 Key Personnel

Key personnel and their responsibilities are;

2.3   Accountable Manager

The primary role of the Accountable Manager is to verify, by monitoring activities in the field of training, that the standards required by the Authority and additional requirements established by Andrewsfield Aviation Ltd, are being carried out properly under the supervision of the Chief Flying Instructor and has overall responsibility for the Compliance monitoring system including the frequency, format and structure of the internal management evaluation activities.

The Accountable Manager is **Miss Carol Cooper (AAL Principle)**
The Deputy Accountable Manager is **Richard Gentil (NAC)**

Compliance Monitoring Manager

The Compliance Monitoring Manager is responsible to the Accountable Manager for:

- Monitoring the compliance of the organisation with all applicable regulatory requirements.

- Monitoring the compliance of the organisation with the provisions of the Operations, Training and Safety Management Manuals.

- Ensuring that the compliance monitoring programme is properly implemented, maintained and continually reviewed and improved.

- Ensuring that audits are conducted by suitably trained and independent personnel.

The Compliance Monitoring Managers are
Mr. N. Boniface (AAL) Michael Rowland (NAC)
The Deputy Compliance Monitoring Manager is **Danielle Clarke (NAC)**

An audit will follow the format of compliance monitoring documentation detailed in AMC1 ORA.GEN.200(a)(6).

2.4 Terminology

Audit - A systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.

Corrective Action - Corrective actions are steps that are taken to remove the causes of an existing nonconformity or undesirable situation. The corrective action process is designed to prevent the recurrence of nonconformities or undesirable situations. It tries to make sure that existing nonconformities and situations don't happen again. It tries to prevent recurrence by eliminating causes. Corrective actions address actual problems. Because of this, the corrective action process can be thought of as a problem solving process.

Inspection - An independent documented conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing or gauging, in order to verify compliance with applicable requirements.

Non Compliance - Failure to meet regulatory or other. A compliance audit makes findings of non-compliance.

Non Conformance - Nonfulfillment of a requirement. Non-conformity or non-comformances are any deviations from established procedures, programs and other arrangements related to the ATO. They may include non-compliances to regulations, but not all non-compliances are necessarily non-conformances.

Observation - An observation indicates that a situation has been discovered during an audit warranting clarification or further investigation in order to improve the overall status and effectiveness of the ATO. Observations do not involve situations where there is direct evidence indicating nonconformance. Observations may signal the potential for a future nonconformity.

Preventive Action - Preventive actions are steps that are taken to remove the causes ofpotential nonconformities or potential situations that are undesirable. The preventive action process is designed to prevent the occurrence of nonconformities or situations that do not yet exist. It tries to prevent occurrence by eliminating causes.

While corrective actions prevent recurrence, preventive actions prevent occurrence. Both types of actions are intended to prevent nonconformities.

Preventive actions address potential problems, ones that haven't yet occurred. In general, the preventive action process can be thought of as a risk analysis process.

The above will involve:

a)   interviews or discussions with personnel.

b)   a review of published documents.

c)   the examination of an adequate sample of student records.

d)   interviews or discussions with students following completion of course

      assessment forms.

e)   the preservation of documents and the recording of observations.

f)   the examination of the Company, staffing and infrastructure.

2.5   Compliance Monitoring Program

The Compliance Monitoring system consists of pro-forma documents (Compliance Documents) that lists all the requirements to be met prior to commencement of the course of training, the items to be covered during the training together with dates when each item is completed, and then signed off by the relevant instructor.

Associated with the Compliance Document are Student Records that will be completed by the relevant instructor, which record in more detail, progress with each item. At the end of the course of training, the Compliance Document will be signed by the CFI to indicate that the student is ready for test. The Compliance Document will also be signed by the student to confirm acceptance of course completion.

The student will be asked to complete a course assessment form. It will be the responsibility of the Accountable Manager to ensure that assessments are completed by students. The comments in this form will help management to address any shortcomings in the training and/or administrative arrangements as perceived by the student. The Accountable Manager will ensure that these are dealt with promptly provided they are deemed to be reasonable and correctable. There is space on the assessment form for completion by the Accountable Manager with comments on action taken.

The student will always have access to the management throughout the training and will have the opportunity to address his/her concerns during training as well as at the end of training.

The Compliance Manager will annually examine the Flying Training Organisations and with the associated Compliance Documents, complete the Compliance Audit Forms,

establish any defects or non-conformities that may have occurred and direct the necessary corrective action. This corrective action, when completed, is to be signed as corrected by the Head of Training who will notify the Compliance Manager who will check to ensure compliance has been affected. This corrective action must be completed within a period of three months from the date of the audit.

*It is the company policy that Audits are carried out to the program in this document however flexibility on this program is permitted with the approval of all concerned parties

Management and Administration Compliance Audit Form
Appendix 1

JANUARY

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
	MANAGEMENT AND ADMINISTRATION			
1	Does the management structure accord with the ATO Operations Manual?			
2	Is the Head of Training suitably approved by the Authority?			
3	Is the Chief Flying Instructor properly qualified?			
4	Does the Accountable Manager have overall responsibility for the ATO, is he qualified and approved.?			
5	Is the Safety Manager qualified / trained and approved?			
6	Are sufficient Flight and Ground Instructors employed to maintain satisfactory student instructor ratios?			
7	Is the Safety Management System promoted among the staff?			
8	Are the Flight Instructors properly qualified and current?			
9	Have the senior management and staff received SMS training?			
10	Are the safety management meetings documented in accordance with the SMS manual?			
12	Are the Training Manuals up to date, pertinent and in the correct format?			
13	Is the training programme to the correct format and freely available to staff and trainees?			
14	Is the Operations Manual up to date and pertinent to the ATO operation?			

#	SUBJECT	AAL Y / N	NAC Y/N/	REMARKS
	MANAGEMENT AND ADMINISTRATION			
15	Is there an effective system for checking that students fulfil all requirements before entering training?			
16	Is there an effective Management System within the ATO?			
17	Are the instructor's duty and training hours in accordance with the operations manual?			
18	Are the trainee duty and training hours in accordance with the operations manual?			
19	Are the Operations and Training Manuals made available to all staff and trainees and is there a system to ensure that both groups are familiar with the contents?			

Audit conducted by (print name) _____ Position held _____

Signature _____ Date _____

Facilities and Accommodation Compliance Audit Form
Appendix 2

MARCH

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
	FACILITIES AND ACCOMODATION			
1	Is there adequate and properly equipped Flight Operations accommodation?			
2	Are there adequate numbers of briefing and lecture facilities available for the number of students?			
3	Do trainees have free access to flight planning information. (AIP, AICs, NOTAMS, Weather, etc.).			
4	Do trainees have free access to ATO publications (Operations Manual and Training Manuals)?			
5	Are all operations, training and planning documents up to date and pertinent to the courses provided?			
6	Does the aerodrome meet the published requirements and is suitable to accommodate flight training?			

Audit conducted by (print name) _____ Position held _____

Signature _____ Date _____

Aircraft and Equipment Compliance Audit Form
Appendix 3

MARCH

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
	AIRCRAFT AND EQUIPMENT			
1	Are the aircraft used for training equipped and maintained to a suitable standard (Record registration of those aircraft which were checked)?			
2	Are the aircraft documents correctly maintained and available to the PIC for inspection?			
3	Are aircraft defects recorded and in accordance with the operations manual?			
4	Are there suitable RT training and testing facilities within the ATO?			
5	Does a process exist whereby the Head of Training ensures that new training aircraft are suitable for the intended training course?			
6	Does the process ensure that the CAA are notified of new training aircraft?			
7	Are Tech Logs / Flight Authorisation sheets completed fully and accurately?			
8	Do all aircraft contain the relevant documentation			

Audit conducted by (print name) _____ Position held _____

Signature _____ Date _____

Instructor Standardisation Compliance Audit Form
Appendix 4

MAY

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
	INSTRUCTOR STANDARDISATION			
1	Is there an effective method of assessing and maintaining instructional standards?			
2	Is there an effective standardisation and staff training program in accordance with the operations manual?			
3	Are the instructors' logbooks kept up to date and in accordance with the Operations manual?			
4	Does the ATO submit to the CAA and maintain a list of Examiners for the conduct of the skill tests?			
5	Is instructor initial, refresher and standardisation training conducted in accordance with the published procedures?			

Audit conducted by (print name) _____   Position held _____

Signature _____   Date _____

Compliance Monitoring System Compliance Audit Form
Appendix 5

JULY

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
	COMPLIANCE MONITORING SYSTEM			
1	Are audits being completed in accordance with the program specified in the Compliance Monitoring System?			
2	Is the auditor independent of the area(s) which are being audited?			
3	Do the audits completed cover all aspects of the ATO, specifically the Regulatory requirements and internal procedures?			
4	Where previous audits identified non-conformances, have these been resolved in a timely manner?			
5	Where corrective or preventative action was identified on previous findings, has this subsequently been checked and found to be effective?			
6	Where any changes requiring prior approval of the Authority have been identified, was approval sought?			
7	Is there an effective system for document control in place?			
8	Are document / version control procedures being followed when manual revisions are made?			

Audit conducted by (print name) _____ Position held _____

Signature _____ Date _____

Training Program & Records Compliance & SMS Audit Form
Appendix 6

OCTOBER

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
	TRAINING PROGRAM & RECORDS			
1	Was the published training programme followed both as to total hours and order of exercises? (Record names of those trainees whose records were checked)			
2	Were training records correctly and fully completed? (Record names of those trainees whose records were checked).			
3	Are the training records retained for the required duration of 5 years?			
4	Were skill tests conducted by a qualified examiner not connected with the candidates training *25%rule			*The examiner may conduct 25% of the dual instruction required.
5	Were all trainees invited to complete a customer feedback form/course critique?			
6	Are the ground school hours recorded for the LAPL/PPL?			
7	Do all trainees' records show evidence of classroom instruction for the theory training?			
8	Do the training records comply with the format specified in the Training Manual appendices?			
9	Are all trainees formally assessed as having sufficient knowledge of the relevant syllabus prior to entry to the Theoretical Knowledge Examinations?			

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
10	Were minimum flight training hours achieved for all trainees?			
11	Where trainees CPL/FI were identified as requiring further training was the procedure followed as per the manual?			Lapl/PPL students have no guidelines for further training as it is as required.
12	Were all training flights authorised in accordance with the company procedure?			
13	Is there evidence that emergency drill and essential safety exercises are being taught in accordance with the training plan?			
14	Did the student meet all specified requirement before 1) First solo 2) First solo cross-country			
15	Was SRG Form 2128 completed, recommending the trainee for the licence skills test, prior to the event?			

#	SUBJECT	AAL Y / N	NAC Y/N	REMARKS
	SAFETY MANAGEMENT AUDIT			
1	Is the SMS Policy performing as per 3.1.1			
2	Are Safety Records being managed as per 3.1.8			
3	Is the safety Reporting System performing as per 3.3			
4.	Is the SMS process of promotion performing 3.13			
5.	Is Management of Changes performing 3.8			

Audit conducted by (print name) _____ Position held _____

Signature _____ Date _____

Compliance Monitoring System Non-Conformity Report

APPENDIX 7

Audit Ref:	Non-Conformance / finding No.		Date:	
Non-Conformance / finding Ref (/OM / TM / MS.):				
Nature of Non-Conformance / finding				
Category of non-conformance/ finding *See notes below	One	Two	Suggestion for improvement	
Area of non-conformance / finding				
Aircraft		Publications		
Accommodation		Synthetic Training Devices		
Course Material		Training Programmes		
Compliance Monitoring System		Training Record		
Document Control				
Signed: Auditor		Accepted: Head of Training		
Agreed Corrective Action				
Agreed Completion Date:		Person responsible:		
Corrective Action Verified as effective				
Date:		CMM / Auditor:		
Signed : Head of Training				

*Notes:

A level 1 finding shall be issued by the competent authority when any significant non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals or with the terms of an approval or certificate which lowers safety or seriously hazards flight safety. The level 1 findings shall include:

(1) failure to give the competent authority access to the organisation's facilities as defined in ORA.GEN.140 during normal operating hours and after two written requests;

(2) obtaining or maintaining the validity of the organisation certificate by falsification of submitted documentary evidence;

(3) evidence of malpractice or fraudulent use of the organisation certificate; and

(4) the lack of an accountable manager.

A level 2 finding shall be issued by the competent authority when any non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals or with the terms of an approval or certificate which could lower safety or hazard flight safety.

Appendix 8

2.5.3   **Course Assessment Form**   **ANDREWSFIELD OR NAC**

Name of Student

Course

Date Commenced   Date Completed

Please comment on aspects of the administration/training against the following headings:

1.   Adequacy of pre-course information

2.   Adequacy of ground training

3.   Adequacy of flight training

4.   Adequacy of administrative arrangements (e.g. classroom/briefing room etc)

5.   Availability of instructor

6.   Availability of aircraft

7.   Availability of examiner

8.   General comments on how training etc., could be improved

Student Signature   Date

Comments by Accountable Manager

Action(s) to be taken

Accountable Manager Signature   Date

Comments by Compliance Manager

Compliance Manager Signature   Date

INTENTIONAL BLANK

Compliance Monitoring Program Schedule for AAL & NAC

APPENDIX 9

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Management and Administration	X											
Aircraft / Equipment			X									
Facilities (classrooms / airfield etc)			X									
Training Programs and records										X		
Instructor Standardisation					X							
Compliance Monitoring System							X					
Annual Directors Compliance/Safety Review Board Meeting **See SMS Page 49**											X	

3   Safety Management

3.1   Scope of the Manual

This Part of the Organisation Management Manual is a reference document describing how safety is managed at Andrewsfield and Naples Air Centre and:

(a)   is the key instrument for communicating the Company's approach to safety to all its personnel and all key personnel were consulted during the making of this policy.

(b)   documents all aspects of safety management, including the safety policy, objectives, procedures and individual safety responsibilities;

(c)   will be distributed throughout the Company to ensure that all personnel are fully aware of the system, thereby ensuring:

   i.   That safety is a central component in our management system;

   ii. That safety is accounted for in all decisions and actions taken by all in the Company;

   iii. The needs, requirements and expectations of customers and other parties are fulfilled.

(d) **Communication of the Safety Policy will**

   i.   Carefully specify what key information needs to be communicated;

   ii. Aim to cut out the transmission of unnecessary information;

   iii. Use aids (such as logs, computer displays) based on the key information needs to help accurate communication;

   iv. Aim to repeat the key information using different mediums, e.g. use both written and verbal communication;

   v.   Allow sufficient time for communication, particularly at shift handover;

   vi. Encourage two-way communication with both the giver and recipient of the information

3.1.1   Safety Policy

The Organisations Safety Policy represents commitment by the Accountable Manager that the organisation will:

- Ensure that Safety Management is based on the Safety Policy

- Improve towards the highest safety standards

- Comply with all applicable legislation, meet all applicable standards and consider best practice

- Provide appropriate resources

- Enforce safety as a primary responsibility of all managers

- Encourage safety reporting and not blame someone for reporting something that would not have been otherwise detected (Just Culture)

Signed: ....(Accountable Manager)
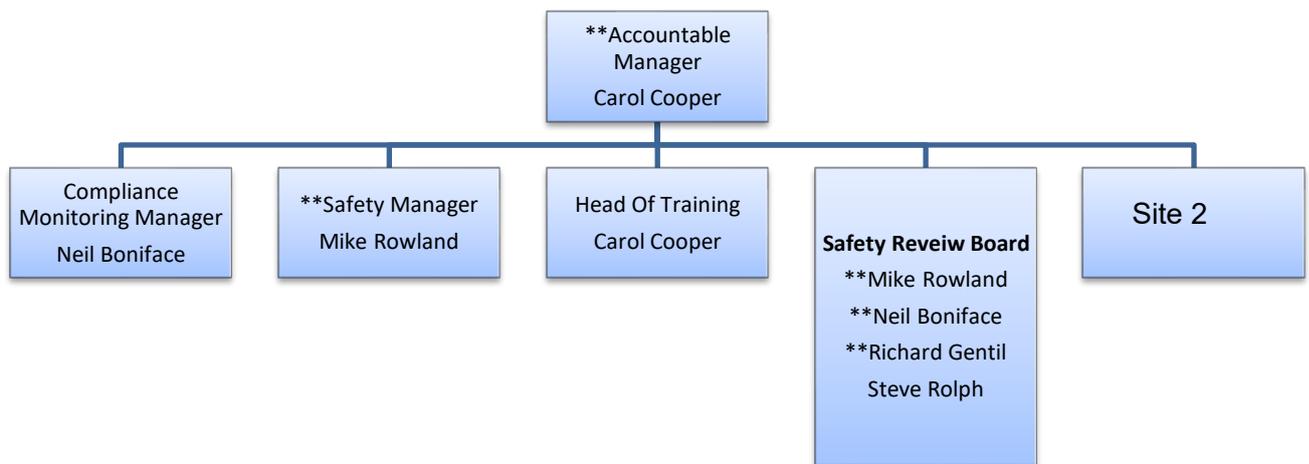
Date:……1/9/25………..

3.1.2   Accountable Manager

3.1.2.1   The Accountable Manager (AM) bears the ultimate accountability for safety in the Company for both sites.
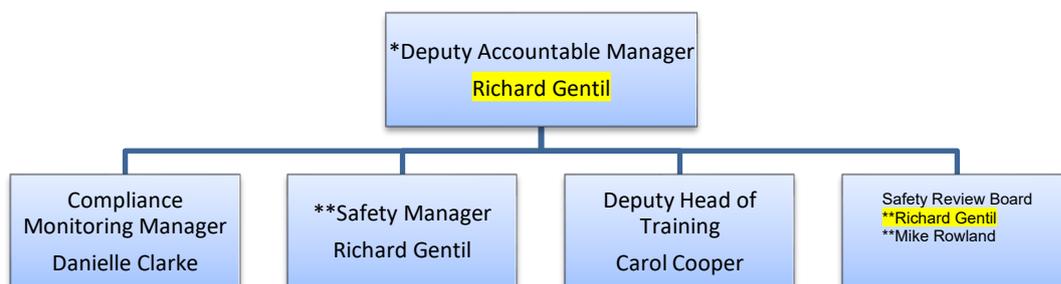
3.1.2.2   The Accountable Manager endorses the Safety Policy; provides the human and material resources necessary for operating the SMS and achieving the safety objectives; nominates the Safety Manager, the Compliance Monitoring Manager and the Safety Committee and is Chairman of the Annual Directors safety meeting and the Safety Review Board

3.1.3 Key Safety Personnel

PRIMARY SITE- Andrewsfield

```
                        **Accountable
                           Manager
                         Carol Cooper

   Compliance      **Safety Manager   Head Of Training   Safety Reveiw Board      Site 2
Monitoring Manager  Mike Rowland       Carol Cooper      **Mike Rowland
 Neil Boniface                                           **Neil Boniface
                                                         **Richard Gentil
                                                           Steve Rolph
```

SITE 2 Naples Air Center

```
                   *Deputy Accountable Manager
                         Richard Gentil

   Compliance      **Safety Manager   Deputy Head of     Safety Review Board
Monitoring Manager  Richard Gentil      Training         **Richard Gentil
 Danielle Clarke                       Carol Cooper      **Mike Rowland
```

Note: * Indicates roles may be combined.

    ** Indicates Mandatory attendance at SRB Meetings

3.1.4   Safety Responsibilities

The safety responsibilities of key personnel are detailed in the ATO Operations Manual, Part A, paragraph 4 All key personnel must be suitably qualified for the role and authorised by the Accountable Manager/Deputy

3.1.4.1 Meetings of Safety Review Board/Safety Action Group

- Will meet every, January, May and November.
- An agenda will be set by the Safety Manager (AAL)/Deputy Safety Manager (NAC).
- Minutes will be recorded in the Hazard Log .
  - Meetings will be held in the CFI Office at (AAL) and the *DCFI office (NAC) *NAC Safety Review Meetings will be carried out by Conference SKYPE.

3.1.5 Organisation Management Manual

3.1.5.1 The Organisation Management Manual is a controlled document that describes the safety management processes and the interrelationship between all of its elements. The relevant Part is maintained by the Safety Manager to whom all suggestions for amendment should be made.

3.1.5.2 The Manual is subject to periodic review (Initially every 3 months minimum) by the Safety Review Board to ensure its continuing suitability, adequacy and effectiveness

3.1.6 Operations Manual

The Operations Manual is a controlled document that describes the procedures to be used in the operations of the ATO's aircraft. The Operations Manual is maintained by the Head of Training to whom all suggestions for amendment should be made by email to carolcooper55@hotmail.com.

3.1.7 Training Manual

The Training Manual is a controlled document that describes the training syllabus and associated procedures for each course. The Training Manual is maintained by the Head of Training to whom all suggestions for amendment should be made by email to carolcooper55@hotmail.com.

3.1.8 Safety Records

Safety records are managed and retained by the Safety Manager. All safety records are to be stored in a secure filing cabinet and retained for a minimum of 5 years from the date that they are generated.

3.2 Hazard Identification and Risk Management

3.2.1 Definitions

Hazard A hazard is defined as a condition, event or circumstance that has the potential to cause harm to people or damage to aircraft, equipment or structures.

Risk A risk is defined as the potential outcome from a hazard and is defined in terms of the likelihood of the harm occurring and the severity if it does

3.3   Safety Reporting System

Individuals from either site can make a report on any safety related issues. These reports can be made using the Accident/Incident Report Form (Appendices A). Completed forms should be submitted to the Safety Manager/Deputy Safety Manager as soon as practicable after the accident or incident has occurred. If Accident/Incident occurs at NAC then completed Report Form A should be emailed to mike@andrewsfield.com.

All Reports and feedback will be available for all parties to review in the Hazard Log.

3.3.1   Communicating

Safety and Hazard communication may include:

> (a) safety policies and procedures;
>
> (b) newsletters;
>
> (c) presentations;
>
> (d) safety notices; and Emails
>
> (e) informal workplace meetings between staff and the Accountable Manager
>
>   or Senior Managers
>
> (f) The Safety Notice Board (AAL) and Safety Notice board (NAC) is provided to communicate safety related issues and should be referred to by all staff and students. A safety Brief is part of the staff and customer/student Induction brief

3.3.3   Just Culture

3.3.3.1   Safe flight/maintenance operations are the ATOs most important commitment. To ensure that commitment, it is imperative to have uninhibited reporting of all incidents and occurrences that compromise safety. Whilst negligence or deliberate violation of the rules is unacceptable, it is recognized that people make mistakes and systems must be designed to be error tolerant.

3.3.3.2   The investigation of Accident, Incident and Safety reports will be entirely non-punitive. The prime objective of the investigative process is to ensure the highest possible degree of safety and not to apportion blame.The Safety Manager will investigate and report to the Safety Review Board.

3.4   Hazard Identification

The hazard identification process is the formal means of collecting, recording, analysing, acting on and generating feedback about hazards that affect the safety of the ATO's operational activities. Hazard identification is an ongoing process that is managed by the Safety Manager. Over 20 years of Operations the list below has been identified as recognised hazards

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 hazard and risk

Andrewsfield	Naples Air Centre
Infringement of Airspace	Recommended Clothing
Fuel Installations/Deliveries	Sun Protection/Dehydration
Hazardous Areas	Fuel Checks/Pollution
All Air Side Movements	Noise Abatement
Outside Contactors	Hot Topics/ USA to UK
Wild Life	Satellite Ops SMS Monitoring

3.5 Risk Assessment

The purpose of the risk assessment process is to allow the Organisation to assess the level of risk associated with the identified hazards in terms of the potential harm. Risks are assessed in terms of severity and likelihood and a simple risk assessment matrix is used to determine the overall level of risk. The Safety Manager who is experienced in risk assessment oversee risk assessing or consults outside specialist if required.

3.5.1 Risk Severity

3.5.1.1 The severity of risk will be determined taking into account any mitigation measures that may already be in place. Severity are assessed in terms of the worst possible realistic scenario.

3.5.1.2 Risk severity is defined in accordance with the following table.

SEVERITY OF CONSEQUENCES		
Definition	**Meaning**	**Value**
Catastrophic	Results in an accident, death or equipment destroyed	5
Hazardous	Serious injury or major equipment damage	4
Major	Serious incident or injury	3
Minor	Results in a minor incident	2
Negligible	Nuisance of little consequence	1

3.5.2 Risk Likelihood

3.5.2.1 The likelihood of an individual risk will be determined taking into account any mitigation measures that may already be in place. Determination of likelihood is not an exact science but relies on a logical, common sense analysis of the risk to arrive at a reasonable answer.

3.5.2.2 Risk likelihood is defined in accordance with the following table:

LIKELIHOOD OF OCCURRENCE		
Definition	**Meaning**	**Value**
Frequent	Likely to occur many times	5
Occasional	Likely to occur sometimes	4
Remote	Unlikely to occur but possible	3
Improbable	Very unlikely to occur	2
Extremely Improbable	Almost inconceivable that the event will occur	1

3.5.3 Tolerability

3.5.3.1   When severity and likelihood have been defined, the tolerability of the risk is determined. Tolerability is defined as either acceptable, to be reviewed or unacceptable allowing a suitable risk mitigation strategy to be developed if required.

3.5.3.2   Definitions of tolerability levels are as follows:

Unacceptable	If the risk is unacceptable, the operation or activity should stop immediately or not take place. Major mitigation will be necessary to reduce the severity if the risk actually occurs or reduce the likelihood of the risk occurring. Normally it is the likelihood of the occurrence that can be reduced rather than the severity.
Review	If the risk falls into the review category, the severity or likelihood of occurrence is of concern; measures to mitigate the risk to as low as reasonably practicable (ALARP) should be sought. Where the risk is still in the review category after this action has been taken it may be that the cost of actions required to reduce the risk further are too prohibitive. The risk may be accepted, provided that the risk is understood and has the endorsement of the Accountable Manager.
Acceptable	If the risk is acceptable the consequence is so unlikely or not severe enough to be of concern; the risk is acceptable. However, consideration should still be given to reducing the risk further.

3.5.4 Risk Tolerability Matrix

The tolerability of an individual risk is determined by use of the following Risk Tolerability Matrix:

Risk Likelihood	Risk Severity				
	Catastrophic 5	Hazardous 4	Major 3	Minor 2	Negligible 1
Frequent 5	Unacceptable	Unacceptable	Unacceptable	Review	Review
Occasional 4	Unacceptable	Unacceptable	Review	Review	Review
Remote 3	Unacceptable	Review	Review	Review	Acceptable
Improbable 2	Review	Review	Review	Acceptable	Acceptable
Extremely Improbable	Review	Acceptable	Acceptable	Acceptable	Acceptable

1					

3.5.5　Mitigation

3.5.5.1　If the level of risk falls into the unacceptable or review categories, mitigation measures will be actioned to reduce the risk to a level as low as reasonably practicable (ALARP).

3.5.5.2　Mitigation measures will be determined by the Safety Review Board, in consultation with the Safety Manager/Deputy Safety Manager and Accountable Manager/Deputy Accountable Manager. When measures are implemented to mitigate the severity and/or likelihood of a risk, a further assessment of tolerability will be conducted, using the Risk Tolerability Matrix.

3.5.6　Hazard Log

3.5.6.1　The Safety Manager(AAL)/Deputy Safety Manager(NAC) will maintain a Hazard Log in which is recorded and stored, All SMS documents and forms including any identified safety hazards, risk assessments and subsequent follow-up actions. The log will include each identified hazard, the associated risk(s), results of the risk assessment, taking into account any current mitigation measures in place, further risk mitigation measures if required and a re-assessment of the risk once the mitigation measures have been implemented, to assess whether they have achieved the desired outcome. Storage of records etc. is for 5 years minimum

3.5.6.2　**Review and Audit of The Hazard Log**

This will be carried out at SRB meeting as per 1.2.3.1

3.6　Safety Assurance

Safety Manager//Deputy Safety Manager monitors the performance and effectiveness of the Safety Management System to ensure that the hazard identification, risk assessment and mitigation process is being implemented effectively.

3.7　Safety Performance Monitoring

The Safety Review Board during the scheduled meeting see 3.1.4 will monitor the performance of the SMS using the data from 3.7.1,& 3.7.2 and report to the Director at the Annual Compliance & Safety meeting held in November with both Safety Review Boards (AAL,NAC)

3.7.1　Safety Performance Indicators

In order for safety performance to be managed effectively, the ATO uses a number of Safety Performance Indicators (SPIs) to measure performance of the system as listed below.

- Number of reportable accidents/incidents involving ATO aircraft
- Number of flight operations occurrences
- Number of ground operations occurrences
- Number of engineering occurrences

- Number of injuries to the ATO's staff, members and guests
- Number of non-compliances with operating standards
- Number of non-compliances with legislative requirements (e.g. Part-FCL. Part-ORA, etc.)
- GAP analysis will be carried out annually to compare how the SMS is achieving its aims. against targets

3.7.2 Safety Data

To assist in the performance management process, safety data may be gathered from:

- Hazard and incident reports
- Warranty claims and customer complaints
- Mandatory Occurrence Reports
- Birdstrike Reports
- Customer/contractor surveys
- Safety surveys and audit findings
- AAIB/NTSB reports & Incident Report Form A,B and C
- Compliance inspections

3.8 Management of Change

3.8.1 General

3.8.1.1 The operation of the organisation is dynamic and changes will frequently occur. Changes such as the introduction of new equipment, changes to facilities or scope of work, introduction of new aircraft or courses, new contractors, new procedures or changes to key staff members. The management of changes will be the Safety Manager/Deputy Safety Managers responsibility and the following should be reported to the safety committee

3.8.1.2 Procedures for managing change include:

- Risk assessment if necessary
- Identification of the goals and objectives and nature of the proposed change
- Identification of operational procedures
- Analysis of changes in location, equipment or operating conditions
- Ensuring that all personnel are made aware of and understand changes
- Ensuring that changes are approved by the appropriate level of management
- The responsibility for reviewing, evaluating and recording the potential safety hazards from the change or its implementation
- If significant changes at NAC occurs then it may be necessary for the accountable Manager and Safety Manager to visit NAC to ensure satisfactory change management. Significant issues may be deemed to be Change of Key listed personnel, Likeliness of Occurrence incidents recorded as level 4 or 5. Incidents that fall into Tolerability Red or Risk Tolerability Red
- 3 month review after any changes by Safety Manager/Deputy Safety Manager, then normal review system during audits

3.9   Incident Management

3.9.1.1   Incidents will inevitably occur and can provide a valuable learning opportunity. The Safety Manager/Deputy Safety Manager will investigate all incidents, calling on such specialist assistance that may be required and prepare a report for the Safety Committee. The Board will review the findings from all incidents and recommend to the Accountable Manager any changes that may be required to prevent a recurrence.

3.9.1.2   The Accountable Manager/Deputy Accountable Manager is responsible for implementing any changes recommended by the Safety Committee and for ensuring that any relevant safety lessons are shared as widely as possible, both within the ATO and with other organisations

3.9.1.3   The purpose of the investigation of an incident is not attempt to apportion blame, merely to determine what happened, when, where, how and who was involved. Every effort should be made to understand why the incident happened and, to this end it is important to establish the facts and avoid speculation.

3.9.2   Emergency Preparedness and Response

An emergency is an event that is, by its very nature, high risk for victims at the immediate scene, and also for first responders and those assisting those responders. The Emergency Response Plan (ERP) exists to control the organisational response to the emergency so as to minimize the risk for all facets of the operation. A copy of the ATO's Emergency Response Plan AAL/NAC is contained in Appendix 1 to this Part. Also found in the AAL/NAC aerodrome manual and various key locations throughout the company.

3.9.3   Emergency Response Plan (ERP)

The ERP outlines in writing what is done when an emergency occurs, what to do after an accident happens and who is responsible for each action. A copy of the ERP is readily available at the Dispatch desk. The ERP will be:

(a)   Exercised every 3 months to ensure the adequacy of the plan and the readiness of the people who must make it work.

(b)   Updated when contact information changes.

(c)   Briefed to all personnel along with their responsibilities.

3.10   Implementation

3.10.1   Initial Contact and ERP Initiation

3.10.1.1   It is expected that an incident or accident involving an ATO aeroplane will, in the first instance be notified to the Dispatch desk by telephone. The person receiving the call will notify, by the quickest means available:

- The nominated Duty Instructor

- The Safety Manager/Deputy Safety Manager

- The Chief Flying Instructor/Deputy CFI

3.10.1.2   The ERP is to be initiated by the nominated Duty Instructor who is to control the plan until relieved by the Safety Manager/ Deputy Safety Manager

3.11   Continuous Improvement

The ATO will continuously seek to improve its safety performance. Continuous improvement of safety performance will be achieved through 3 month reviews and:

- proactive and reactive evaluations of facilities, equipment, documentation and procedures through safety audits and surveys;
- proactive evaluation of each individuals performance to verify the fulfilment of their safety responsibilities; and
- a reactive evaluation in order to verify the effectiveness of the system for control and mitigation of risk.
- The Company will also continuously seek to improve its safety management processes. Through GAP analysis

3.11.1   Method

Continuous improvement of safety management will be achieved through:

- Assessment of how the safety management processes are functioning;
- Identification and analysis of possible issues/challenges associated with the running of the processes;
- Implementing changes aimed at improving the processes;
- Monitoring and reviewing the effects of any changes.
- GAP analysis

3.11.2   Reporting

The Safety Manager/ Deputy Safety Manager is to provide an annual report to the Accountable Manager on safety performance (how well safety is managed) and on the processes (how effectively safety management works, the stage of implementation, any issues/challenges and any proposals for improvement). The report should include a comparison with the levels achieved in previous years.

All incidents are recorded in the Daily Log held in the operations offices at AAL and NAC.

3.12   Contracted Activities

3.12.1.1   The Company may contract certain activities to external organisations for the provision of services. The ultimate responsibility for contracted activities, i.e. for the product or service provided by external organisations always remains with the Company.

3.12.2.2   A written agreement and brief is signed between the Company and the contracted organisation and clearly defines the contracted activities and the applicable requirements. Risk Assessments and Insurances may be required from the contracted company.

3.12.2   Safety Management

3.12.2.1   Activities performed by sub-contractors may have an impact on safety, therefore, the contracted safety related activities are addressed through the Company's safety management and compliance monitoring programme.

3.12.2.2   As part of safety management, a risk analysis is to be carried out by any newly contracted activity as part of the change management process. If corrective and/or preventive actions need to be implemented, they are to be submitted in writing to the sub-contractors or suppliers. Effective application of these measures will be checked and monitored under the supervision of the Safety Manager /Deputy Safety Manager

3.12.3   Compliance Monitoring

As part of the Compliance Monitoring Programme, the Company must ensure that the contracted organisation has the necessary authorisations or approvals where required, and has the resources and competence to undertake the task. Compliance with applicable regulations, Company requirements and procedures are to be checked and monitored under the supervision of the Compliance Manager.

3.13   Safety Promotion

3.13.1.1   Safety Promotion is a process aimed at promoting a culture of safety by ensuring that all personnel in our organisation are aware that, at their level and in their day-to-day activity, they are key players in safety and that everyone, therefore, contributes to effective safety management.

3.13.1.2   It is the responsibility of each manager to demonstrate his/her commitment to safety, to promote safety in everyday activities and to lead by example.

3.13.1.3   Training and effective communication on safety are two important processes supporting safety promotion.

3.13.1.4   The Safety Notice Board is maintained by the Safety Manager/ Deputy Safety Manager to ensure that external users and visitors are aware of safety in the company

3.13.1.5   Hazards identified from any safety report or investigation will be communicated via to all members and staff via Safety Notice Board, Members email, and regular newsletters.

3.13.2   Training

3.13.2.1   All ATO personnel receive safety training on Organisation and Human safety factors as appropriate for their safety responsibilities. The Safety Manager/ Deputy Safety Manager maintains records of all safety training provided, records will be monitored and assessed during the January Compliance Monitoring audit for effectiveness.

3.13.2.2   All personnel receive training to maintain their competences. This includes notification of any changes to applicable regulations and rules, Company procedures, and safety-relevant technical matters. This is achieved by document change management and the signing of the SMS signature page annually or on change. 3.13.2.3 The following table shows the safety training given to ATO employees.

Contents	Training Objectives
Safety Policy and SMS	Understand the main elements of the Safety Policy and the Safety Management System
Organisation, roles and responsibilities and Human Factors of safety	Understand the organisation, roles and responsibilities concerning the management of safety. Everyone to know his or her own role in the management of safety.
Safety Objectives	Understand the Company's safety objectives.
Emergency Response Planning (ERP) (reinforced through practical simulations)	Understand the various roles and responsibilities in the Company's ERP. Everyone to know his or her own role in the ERP.
Occurrence and hazards reporting	Know the means and procedures for reporting occurrences and hazards.
Safety Risk Management (SRM) process including roles and responsibilities	Understand the Safety Risk Management process. Everyone to know his or her own role in the SRM.
Continuous improvement of safety performance	Understand the principles of continuous improvement of safety performance.
Compliance Monitoring	Understand the basic principles of Compliance Monitoring.
Responsibility when contracting activities	Understand the Company's responsibilities when contracting activities. Everyone should know his or her own roles and responsibilities regarding this subject.

COMPLIANCE &SAFETY MANAGEMENT SYSTEM ANNUAL DIRECTORS MEETING REPORT

Date :

Present:

Name	Title

Remarks:

Recommendations:

Signed by Accountable Manager

…………………………………………

SAFETY REPORTING FORM

Part A: To be completed by the person identifying the event or hazard

Date of Event: ……………………………………… Time of Event (Local) …………………………..

Location:.……………………………………………

Name of Reporter:…………………… Section/Organisation………………………………………

Please fully describe the event or hazard.

Please include your suggestions on how to prevent similar occurrence

```
 Description:



```

In your opinion what is the likelihood of such a similar occurrence to happen or happening again.

Extremely improbable   Frequent
1   2   3   4   5

What do you consider could be the worst possible consequences if this event did happen or happen again?

Negligible   Catastrophic
1   2   3   4   5

SAFETY REPORTING FORM

Part B: To be completed by the Safety officer.

The report has been dis-identified and entered into the company records

Report Reference: ……………………………

Signature:…………………………………

Name:……………………………………..

Date:…………………………………………..

SAFETY REPORTING FORM

Part C: To be completed by the Safety officer

Rate the likelihood of the event occurring or reoccurring:

Extremely improbable   Frequent
1   2   3   4   5

Rate the worst-case consequences?

Negligible   Catastrophic
1   2   3   4   5

What action or actions are required to ELIMINATE, MITIGATE or CONTROL the hazard to an acceptable level of safety?

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Responsible Manager Date: ....

Accountable Manager Date: ....

Appropriate Feedback given by staff by Safety Officer

Signed : .... Date: ....

Follow up action required: When: ....   Who: ....

Hazard Log Updated: When: ....

ANDREWSFIELD AERODROME - EMERGENCY RESPONSE PLAN

AIRCRAFT ACCIDENT
Immediate Action.
1. OPERATE CRASH ALARM - Fire crew to proceed to accident site if on/near Aerodrome. If RFF manning at a minimum fire crew to take radio & portable telephone.

2. DIAL 999 - ASK FOR FIRE BRIGADE - SAY "ANDREWSFIELD AERODROME, STEBBING, CM6 3TH AIRCRAFT ACCIDENT, LOCATION........... PERSONS ON BOARD....... NOTIFY POLICE & AMBULANCE"
(Fire Brigade will notify Police & Ambulance Services)(All services will attend)

3. DIAL 01799 531218 SAFRON WALDEN ACCIDENT GROUP (SWAG) - SAY "ANDREWSFIELD AERODROME, STEBBING,CM6 3TH AIRCRAFT ACCIDENT, PERSONS ON BOARD......." (Doctor will attend)
Subsequent Action.
4. NOTIFY STANSTED TOWER on 01279 669328 and SUPERVISOR'S DESK SWANWICK on 01489 612420

5. NOTIFY AERODROME FIRE OFFICER

6. NOTIFY A.A.I.B. on 01252 512299 And Airfield Manager 07710453927

ACCIDENT IMMINENT
Immediate Action.
1. OPERATE CRASH ALARM - Fire crew to position appliance at car park entrance to await arrival of aircraft. If RFF manning at a minimum fire crew to take radio & portable telephone.

2. DIAL 999 - ASK FOR FIRE BRIGADE - SAY "ANDREWSFIELD AERODROME, STEBBING, CM6 3TH AIRCRAFT ACCIDENT IMMINENT, PERSONS ON BOARD....... NOTIFY POLICE & AMBULANCE"
(Fire Brigade will notify Police & Ambulance Services)
(All services will attend)

3. DIAL 01799 531218 SAFRON WALDEN ACCIDENT GROUP (SWAG) - SAY "ANDREWSFIELD AERODROME, STEBBING,CM6 3TH AIRCRAFT ACCIDENT IMMINENT, PERSONS ON BOARD......." (Doctor on standby)
Subsequent Action.
4. NOTIFY ESSEX FIRE BRIGADE & SWAG IF AN AIRCRAFT ACCIDENT OCCURS OR THE AIRCRAFT LANDS SAFELY.

GROUND INCIDENT
1. OPERATE CRASH ALARM - Fire crew to proceed to site of incident.

2. If incident develops into an AIRCRAFT ACCIDENT, carry out actions 2 - 6 as for AIRCRAFT ACCIDENT.
3. NOTIFY FIRE OFFICER in any event.
LOCAL STANDBY
1. **OPERATE CRASH ALARM** - Fire crew to position at entrance to car park.
2. 2. If Standby develops into an AIRCRAFT ACCIDENT, carry out actions 2 - 6 as for AIRCRAFT ACCIDENT.

- *NAPLES AIR CENTRE- EMERCENCY RESPONSE PLANE*

Emergency Response Plan

The ERP is designed for the smooth transition in an orderly and efficient way from normal to emergency operations. The Dispatch Desk will be responsible for changing the operation from normal to emergency operations.

First Responder Numbers:

- **Aircraft Rescue and Firefighting 239-643-4701**
- **EMS 239-252-8459**
- **EMS Helicopter 239-252-5627**
- **Naples Police 239-213-4844**
- **NAA Duty Officer 239-564-1692**

First duty is to phone the appropriate number for the first responders listed above for the emergency marking commencement of emergency operations.

Second duty is to contact the customers and instructors at the school to assemble in the parking lot if an evacuation of the school is deemed necessary.

Third duty is to account for all aircraft currently not tied down on the ramp and if necessary cease all operations.

Fourth duty is the contact in the following order:

All Matters:

- **Richard Gentil 239-289-7747**
- ~~**Nicola Gentil 239-289-7737**~~

Additionally:

- **Maintenance Matters:**

  - **Jack Irvine 239-293-7505**
  - **Russ Witt 239-601-1832**
  - **Bob House 239-821-4620**

  - **Aviation School Matters:**

  - **Vic Caliva 623-521-5852**
  - **Bob Humble 239-431-5534**

Only Richard Gentil will be allowed