

Initial audit – what to look for:

Postholders structure – complex vs. non-complex ATO



European Union Aviation Safety Agency

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COMPLEX OR NON COMPLEX ORGANIZATION

ORA.GEN.200

SIZE, NATURE AND COMPLEXITY OF THE ACTIVITY

- An organisation should be considered as complex when it has a workforce of more than 20 full time equivalents (FTEs) involved in the activity



FULL TIME EQUIVALENT (FTE)

- full-time equivalent, sometimes abbreviated as FTE, is a unit to measure employed persons or students in a way that makes them comparable although they may work or study a different number of hours per week.
- The unit is obtained by comparing an employee's or student's average number of hours worked to the average number of hours of a full-time worker or student. A full-time person is therefore counted as one FTE, while a part-time worker / student gets a score in proportion to the hours he or she works or studies. For example, a part-time worker employed for 20 hours a week where full-time work consists of 40 hours, is counted as 0.5 FTE.
- e.g. Eurostat statistic

COMPLEX OR NON COMPLEX ORGANIZATION

- Organisations with up to 20 full time equivalents (FTEs) involved in the activity, may also be considered complex based on an assessment of the following factors:
- in terms of complexity, the extent and scope of contracted activities subject to the approval;

COMPLEX OR NON COMPLEX ORGANIZATION

- In terms of risk criteria, whether any of the following are present:
- operations requiring the following specific approvals: performance based navigation (PBN), low visibility operation (LVO), extended range operations with two-engine airplanes (ETOPS), helicopter hoist operation (HHO), helicopter emergency medical service (HEMS), night vision imaging system (NVIS) and dangerous goods (DG);
- different types of aircraft used;
- the environment (offshore, mountainous area etc.)

COMPLEX OR NON COMPLEX ORGANIZATION

- Regardless of the criteria mentioned in the previous slide, the following organizations should always be considered as non-complex:
- (1) Approved Training Organizations (ATOs) only providing training for the light aircraft pilot license (LAPL), private pilot license (PPL), sailplane pilot license (SPL) or balloon pilot license (BPL) and the associated ratings and certificates;

COMPLEX OR NON COMPLEX ORGANIZATION

→ Regardless of the criteria mentioned in (a) and (b), the organisations that provide training in the following areas should always be considered as complex:

1. full flight simulators (FFSs); or
2. multi-pilot (MP) type rating; or
3. zero-flight-time training (ZFTT); or
4. complex aircraft; or
5. different categories of aircraft; or
6. instructor certificates for point (2) and (4) aircraft; or
7. two or more aerodromes/operating sites.

Major difference

- Complex organization will have a structured SMS system and a proper CMS
- No complex organization will be structured for the size and the scope of their training only





Thank you very much for your attention and patience



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