



TRAINING ASSESSMENTS AND CONSULTING UNIT

GUIDELINES FOR ASSESSORS

WHEN

CONDUCTING INITIAL ASSESSMENTS OF TPP APPLICANTS (PQ1)

In order to enhance the coherence and consistency of the assessment process, this document provides guidelines to assessors of the ICAO Global Aviation Training (GAT) Office to identify the appropriate classification of non-compliances (recommendation or observation) raised during the conduct of the initial assessment of a TPP applicant.

1. Approval of the Training Organization

Ref	Protocol Question	Comments/Reference
1.1	Does the training organization have the required authorization(s) to operate from the government? (<i>Civil Aviation Authority or other government department</i>)	Always recommendation if not compliant for an Approved Training Organization (ATO), i.e. delivering training for the issuance of an aviation personnel license (as per ICAO Annex 1).
1.2	Are there approvals for flight crew training, air traffic control training and maintenance training?	For Info only
1.3	Are there approvals for other aviation related training or non-aviation related training?	For info only
1.4	Does the approval document contain at least the following:	
1.4.1	Organization's name and location	Always observation if not compliant
1.4.2	Date of issue and of expiry	Always observation if not compliant
1.4.3	Terms of approval	Always observation if not compliant
1.5	Are approval documents available to staff?	Always observation if not compliant
1.6	Are copies of specific approvals related to the scope of assessment available for ICAO file?	Always recommendation if not compliant for ATOs.

2. Training and Procedures Manual

Ref.	Protocol Question	Comments/Reference
2.1	Has the training organization established a Training and Procedures Manual (TPM)?	Or has it developed procedures and reference documents which could constitute a TPM? If not, the non-compliance should be identified as a recommendation
2.2	Does the TPM contain the following:	
2.2.1	preamble relating to the use and applicability of the manual	Always observation if not compliant
2.2.2	table of contents	Always observation if not compliant
2.2.3	amendment, revision and distribution of the manual	Always observation if not compliant
2.2.4	procedures for amendment and record of amendment	Always observation if not compliant
2.2.5	distribution list	Always observation if not compliant
2.2.6	glossary of definitions and significant terms, list of acronyms and/or abbreviations	Always observation if not compliant
2.2.7	description of the structure and layout of the manual	Always observation if not compliant
2.2.8	sample forms referenced in the various procedures	Always observation if not compliant
2.2.9	A procedure for document control to maintain the manual in a systematic/ organized manner and obviate the need to re-issue the whole manual just to introduce some minor changes in the document	Always observation if not compliant

Ref.	Protocol Question	Comments/Reference
2.2.10	If the training organization is recognized as an ATO by a State, a copy of the State's approval of the TPM	Always observation if not compliant
2.2.11	a general description of the scope of training authorized under the organization's terms of approval	Always observation if not compliant
2.2.12	the organizational structure of the training organization	Always observation if not compliant
2.2.13	the names of the post holders within the organizational structure	Always observation if not compliant
2.2.14	the name, duties and qualification of the person designated as responsible for compliance with the requirements of the approval	If the accountable person is not clearly identified (title and name), then this will be identified as a recommendation if not compliant.
2.2.15	a description of the duties and qualification of the personnel designated as responsible for planning, performing and supervising the training	Always observation if not compliant
2.2.16	the identification of person(s) or positions responsible for the maintenance of performance standards and for ensuring the competency of instructional staff	Always observation if not compliant
2.2.17	qualifications, responsibilities and reporting hierarchy of management and key operational personnel, including but not limited to:	
2.2.17.1	accountable executive	If the Accountable Executive is not clearly identified (title and name) in any reference document, then this will be identified as a recommendation if not compliant.
2.2.17.2	head of training	For an ATO, if the Head of Training is not clearly identified (title and name) in any reference document, then this will be identified as a recommendation if not compliant. For non-ATOs, always an observation if not compliant
2.2.17.3	quality manager	For an ATO, if the Quality Manager is not clearly identified (title and name) in any reference document, then this will be identified as a recommendation if not compliant. For non-ATOs, always an observation if not compliant
2.2.17.4	maintenance manager, if applicable	Always observation if not compliant
2.2.17.5	safety manager, if applicable	Only for ATOs operating aircraft, if the safety manager is not clearly identified (title and name) in any reference document, then this will be identified as a recommendation if not compliant.
2.2.17.6	instructors	Always observation if not compliant

Ref.	Protocol Question	Comments/Reference
2.2.17.7	examiners, evaluators and auditors	Always observation if not compliant
2.2.18	policies of the training organization covering:	
2.2.18.1	the training organization's objectives, including ethics and values	Always observation if not compliant
2.2.18.2	the selection of operational personnel and the maintenance of their qualifications	Always observation if not compliant
2.2.18.3	the evaluation of instructional personnel	Always observation if not compliant
2.2.18.4	the training programme design and development, including the need for programme validation and review	Always observation if not compliant
2.2.18.5	the outsourcing of training programme development to third-party providers (if applicable)	Always observation if not compliant
2.2.18.6	the evaluation, selection and maintenance of training material and devices	Always observation if not compliant
2.2.18.7	the maintenance of the facilities and training equipment;	Always observation if not compliant
2.2.18.8	the development and maintenance of a quality system governance model	Always observation if not compliant
2.2.19	content of the training programmes offered including the courseware and equipment to be used	Always observation if not compliant
2.2.20	for each programme, the aim of the course in the form of a statement of what the student is expected to be able to do as a result of the training	Always observation if not compliant
2.2.21	for each programme, pre-entry requirements, including:	
2.2.21.1	minimum age	Always observation if not compliant
2.2.21.2	education or qualification requirements	Always observation if not compliant
2.2.21.3	medical requirements; and	Always observation if not compliant
2.2.21.4	linguistic requirements	Always observation if not compliant
2.2.22	for each training, a description of credits for previous knowledge, experience or other qualifications, which should be obtained from the Licensing Authority before the training commences	Always observation if not compliant
2.2.23	a description of the training curricula of each course, including:	
2.2.23.1	theoretical training (knowledge)	Always observation if not compliant
2.2.23.2	practical training (skills)	Always observation if not compliant
2.2.23.3	training in the domain of Human Factors (attitudes)	Always observation if not compliant
2.2.23.4	assessment and examinations	Always observation if not compliant
2.2.23.5	monitoring of the training process	Always observation if not compliant
2.2.24	for each training, a description of the policy for the conduct of student evaluation, including:	
2.2.24.1	procedures for authorization of tests	Always observation if not compliant
2.2.24.2	procedures for remediation training before retest	Always observation if not compliant
2.2.24.3	test reports and records	Always observation if not compliant
2.2.24.4	procedures for question analysis and review and for issuing replacement exams	Always observation if not compliant
2.2.25	a description of the policy regarding training effectiveness, including	

Ref.	Protocol Question	Comments/Reference
2.2.25.1	internal feedback system for detecting training deficiencies	Always observation if not compliant
2.2.25.2	procedures to correct unsatisfactory progress	Always observation if not compliant
2.2.25.3	procedures for changing instructors	Always observation if not compliant
2.2.25.4	procedures for suspending a student from training for reasons other than disciplinary	Always observation if not compliant
2.2.26	individual student responsibilities/code of conduct	Always observation if not compliant
2.2.27	a description of the organization's facilities and equipment including:	
2.2.27.1	a description of classrooms, briefing rooms, operations facilities, installed equipment and training aids	For an ATO, if it is not clearly identified in any reference document including TPM or any other document, then this will be identified as a recommendation if not compliant. For non-ATOs, always an observation if not compliant.
2.2.27.2	a description of the maintenance facilities (if applicable)	Always observation if not compliant
2.2.27.3	A list of aircraft types and/or flight simulation devices (if applicable)	Always observation if not compliant
2.2.27.4	A list of ATS training simulation devices (if applicable)	Always observation if not compliant
2.2.27.5	A list of aircraft maintenance training simulation devices (if applicable)	Always observation if not compliant
2.2.28	a description of the policy regarding staff training, including	
2.2.28.1	a description of the procedures used to establish and maintain the competence of instructional personnel.	Always observation if not compliant
2.2.28.2	details of the initial and recurrent training programmes for all personnel involved in training activities.	Always observation if not compliant
2.2.28.3	procedures for proficiency checks and upgrade training of the staff when applicable.	Always observation if not compliant
2.2.29	a description of the policies and procedures regarding records, including:	
2.2.29.1	attendance records	For ATOs, if it is not clearly identified in any reference document including TPM or any other document, then this will be identified as a recommendation if not compliant. For non-ATOs, always an observation if not compliant.
2.2.29.2	student training records	For ATOs, if it is not clearly identified in any reference document including TPM or any other document, then this will be identified as a recommendation if not compliant. For non-ATOs, always an observation if not compliant.

Ref.	Protocol Question	Comments/Reference
2.2.29.3	staff training and qualification records	For ATOs, if it is not clearly identified in any reference document including TPM or any other document, then this will be identified as a recommendation if not compliant. For non-ATOs, always an observation if not compliant.
2.2.29.4	persons responsible for checking records and student personal logs	Always observation if not compliant
2.2.29.5	security of records and documents.	Always observation if not compliant
2.2.30	a description, when applicable, of additional training needed to comply with customers such as an operator's procedures and requirements.	Always observation if not compliant
2.2.31	Is the Training Organization authorized by the State to conduct the testing required for the issuance of a licence or rating? If so, does the TPM include:	For information
2.2.31.1	the name(s) of the personnel with testing authority and the scope of the authority;	For ATOs and if applicable, if it is not clearly identified in any reference document including TPM or any other document, then this will be identified as a recommendation if not compliant.
2.2.31.2	the role and duties of the authorized personnel;	Always observation if not compliant
2.2.31.3	if the training organization has been given authority to appoint personnel to conduct the testing required (for the issuance of a licence or rating), does the TPM also include the minimum requirements for appointment as well as the selection and appointment procedure;	Always observation if not compliant
2.2.31.4	the procedure to be followed in the conduct of checks and tests, as established by the Licensing Authority;	For ATOs, if it is not clearly identified in any reference document including TPM or any other document, then this will be identified as a recommendation if not compliant.
2.3	Is the TPM amended as necessary to keep the information contained herein up to date?	Always observation if not compliant
2.4	Are copies of all amendments to the TPM furnished promptly to all organizations or persons to whom the manual has been issued?	Always observation if not compliant
2.5	Is the TPM readily available to all operational personnel?	Always observation if not compliant
2.6	Do all operational staff members of the training organization have a good knowledge of the TPM?	Always observation if not compliant
2.7	Is there a formal feedback system in place to obtain input from principal users of the manual ?	Always observation if not compliant
2.8	Is the amendment procedure consistently applied?	Always observation if not compliant

3. Training Programmes and Training Delivery

Ref.	Protocol Question	Comments/Reference
3.1	Has the training organization established a Course Development Unit (CDU)?	For Info
3.2	Is the CDU currently operational?	For Info
3.3	Are Course Developers clearly identified in the training organization?	For Info
3.4	Are Course developers included in the Organization diagram of the training organization?	For Info
3.5	Have the course developers been trained in an ICAO Training Developers Course?	For Info
3.6	Is the training organization using an Instructional Systems Design (ISD) methodology for the development of its courses?	Always observation if not compliant
3.7	Does the training organization have access to Subject Matter Experts (SMEs)?	Always observation if not compliant
3.8	Does the training organization have contacts with the aviation sector to analyse the training needs, professional performance and potential development of training programmes?	Always observation if not compliant
3.9	Upon evaluating the course development methodology of the training organization, does this methodology address the analysis, design, production and evaluation phases as articulated in the Training Development Guide (TDG)?	Always observation if not compliant
3.10	Having observed at least one course, are the instructional methods used by the training organization adequate?	Always observation if not compliant
3.11	Are instructors using a lesson plan?	Always observation if not compliant
3.12	Are training materials provided to instructors and learners adequate?	Always observation if not compliant
3.13	Is the interaction between instructors and trainees sufficient and adequate?	Always observation if not compliant
3.14	Do instructors submit reports after each course delivery?	Always observation if not compliant
3.15	Are instructors' reports periodically reviewed by the course developers?	Always observation if not compliant

4. Facilities

Ref.	Protocol Question	Comments/Reference
4.1	Does the information concerning facilities in the Application Form correspond with visual observation?	Always observation if not compliant
4.2	Is the specialized equipment required for practical exercises consistent with equipment currently used in the workplace?	Observation if not compliant. It could exceptionally be identified as a recommendation if during the discussion both the assessor and

		the applicant agree that having a stronger statement will help it to secure additional funding or resources to improve its operations.
4.3	Is the specialized equipment regularly evaluated to ensure that students receive training on equipment they are likely to encounter in the workplace?	Observation if not compliant. It could exceptionally be identified as a recommendation if during the discussion both the assessor and the applicant agree that having a stronger statement will help it to secure additional funding or resources to improve its operations.
4.4	Do the facilities, training equipment, training devices and material meet the training needs and scope??	Observation if not compliant. It could exceptionally be identified as a recommendation if during the discussion both the assessor and the applicant agree that having a stronger statement will help it to secure additional funding or resources to improve its operations.
4.5	Are the facilities up to date?	Observation if not compliant. It could exceptionally be identified as a recommendation if during the discussion both the assessor and the applicant agree that having a stronger statement will help it to secure additional funding or resources to improve its operations.
4.6	Is the training equipment up to date?	Observation if not compliant. It could exceptionally be identified as a recommendation if during the discussion both the assessor and the applicant agree that having a stronger statement will help it to secure additional funding or resources to improve its operations.
4.7	Does the training organization have sufficient, appropriate and up-to-date library materials and reference documents, or has it access to it?	Observation if not compliant. It could exceptionally be identified as a recommendation if during the discussion both the assessor and the applicant agree that having a stronger statement will help it to secure additional funding or resources to improve its

		operations.
4.8	Is the training organization using synthetic training devices (i.e. simulators) in the conduct of its training?	For information
4.9	If yes, have those synthetic training devices (i.e. simulators) been qualified by the State and approved by the Licensing Authority?	When applicable, and for a Flight Training Organization and Flight Simulators, to be identified as a recommendation in case of non-compliance.
4.10	Is the organization using the following training devices and equipment for approved training programmes?	
4.10.1	ATC Tower simulators?	For information, if yes provide details of the equipment
4.10.2	ATC Radar simulators?	For information, if yes provide details of the equipment
4.10.3	Flight simulators?	For information, if yes provide details of the equipment
4.10.4	Aircraft simulators?	For information, if yes provide details of the equipment
4.10.5	Aircrafts for training	For information, if yes provide details of the equipment
4.10.6	CNS lab?	For information, if yes provide details of the equipment
4.10.7	Aircraft maintenance lab?	For information, if yes provide details of the equipment
4.10.8	AVSEC lab?	For information, if yes provide details of the equipment
4.10.9	Rescue and Fire Fighting simulators?	For information, if yes provide details of the equipment
4.10.10	Language lab?	For information, if yes provide details of the equipment
4.10.11	Other equipment or labs related to the courses offered?	For information, if yes provide details of the equipment
4.11	Training environment	
4.11.1	Are the primary classrooms large enough to accommodate the type of training provided?	Always observation if not compliant
4.11.2	Are lighting and window coverings adjustable so that projected audio-visual aids are easily viewed from all trainee positions?	Always observation if not compliant
4.11.3	Does the heating, ventilation and air-conditioning system provide a comfortable environment?	Always observation if not compliant
4.11.4	Do the walls and floors provide a comfortable and appropriate environment?	Always observation if not compliant
4.11.5	Are the training facilities maintained in good condition?	Observation if not compliant, unless the situation generates significant safety risks. It could exceptionally be identified as a recommendation if during the discussion both the assessor and

		the applicant agree that having a stronger statement will help it to secure additional funding to improve its facilities.
4.12	Does the training organization have appropriate facilities for instructors?	Always observation if not compliant
4.13	Does each instructor have their own desk with sufficient space to allow them to prepare course materials?	Always observation if not compliant
4.14	Is the office large enough to accommodate the required number of work stations and equipment??	Always observation if not compliant
4.15	Do part-time instructors have a dedicated space to prepare their course delivery?	Always observation if not compliant
4.16	Does each instructor have access to one computer provided by the training organization?	Always observation if not compliant
4.17	Do instructors have access to at least one quality printer?	Always observation if not compliant
4.18	Do instructors have access to a scanner?	Always observation if not compliant
4.19	Has the training organization established a system to review and analyse feedback from trainees and clients regarding the facilities?	Always observation if not compliant

5. Personnel

Ref.	Protocol Question	Comments/Reference
5.1	Has the training organization nominated a person responsible for ensuring that it is in compliance with the requirements of the approval?	For ATOs, if the accountable person is not clearly identified (title and name) then this will be identified as a recommendation if not compliant.
5.2	Is the organization employing the necessary personnel to plan, perform and supervise the training to be conducted? (including permanent and part-time positions and staff)	Always observation if not compliant
5.3	Has the training organization identified job descriptions for all staff listed in the organizational structure presented in the TPM?	To be identified as a recommendation if job descriptions of key operational staff is missing in any reference document.
5.4	Do the job descriptions clearly indicate the following:	
5.4.1	Major duties	Always observation if not compliant
5.4.2	Responsibilities	Always observation if not compliant
5.4.3	Required qualifications	Always observation if not compliant
5.4.4	Reporting hierarchy	Always observation if not compliant
5.5	Is there a formal instructor training and evaluation system in place?	To be identified as a recommendation if there is absolutely no track (process, procedure, document, meeting minutes, record...) of instructors evaluation.

5.6	Are instructors evaluated at least once a year?	Always observation if not compliant
5.7	Are training and evaluation of instructors documented as described in the TPM?	Always observation if not compliant
5.8	Does the system include direct observation of instructors by training management staff?	Always observation if not compliant
5.9	Does the training organization ensure that all instructional personnel receive initial and recurrent training?	For ATOs, to be identified as a recommendation if there is absolutely no track (process, procedure, document, meeting minutes, record...) of instructors training.
5.10	Does this training programme include training in knowledge and skills related to human performance?	Always observation if not compliant
5.11	If required by State's regulations, does the training organization have the capability to monitor that instructors maintain their licenses, currency and accreditations to conduct training and evaluations?	For an ATO and if required by the State, to be identified as a recommendation if not compliant. Otherwise always observation if not compliant
5.12	If a recurrent or on-going training is not available, is there another method in place for instructors to keep pace with regulatory changes and other developments?	Always observation if not compliant

6. Records

Ref.	Protocol Question	Comments/Reference
6.1	Are procedures on record keeping described in the TPM adequately followed?	Always observation if not compliant
6.2	Do the policies and procedures on record keeping for trainees address both paper and electronic formats?	Always observation if not compliant
6.3	Do the policies and procedures on record keeping for instructional staff address both paper and electronic formats?	Always observation if not compliant
6.4	Is the content of trainees records well defined in a procedure?	Always observation if not compliant
6.5	Are student records retained by the training organization containing all details showing that all requirements of the training course have been met?	For ATOs, to be identified as a recommendation in case of non-compliance. For non-ATOs, always an observation if not compliant
6.6	Are the results of tests and exams appropriately recorded?	For ATOs, to be identified as a recommendation in case of non-compliance. For non-ATOs, always an observation if not compliant
6.7	Are the students training records kept for a minimum period of two years after completion of the training?	For ATOs, to be identified as a recommendation in case of non-compliance. For non-ATOs, always an observation if not compliant
6.8	Does the training organization maintain a system for recording the qualifications and training of instructional staff?	For ATOs, to be identified as a recommendation in case of non-compliance. For non-ATOs, always

		an observation if not compliant
6.9	Is the content of instructional staff records well defined in a procedure?	Always observation if not compliant
6.10	Are instructors and examiners records retained for a minimum period of two (2) years after the instructor or examiner ceases to perform a function for the training organization?	For ATOs, to be identified as a recommendation in case of non-compliance. For non-ATOs, always an observation if not compliant
6.11	If required, is the training organization maintaining a system for recording the qualifications and training of examining staff?	For an ATO and if required by the State, to be identified as a recommendation if no compliant. Otherwise always observation if not compliant
6.12	In a random review of records, is the recording system secure and adequate?	Always observation if no compliant

7. Quality System

Ref.	Protocol Question	Comments/Reference
7.1	Has the training organization established a Quality Management System (QMS)?	Or has it developed procedures and reference documents which address Quality Assurance? If not, the non-compliance should be identified as a recommendation
7.2	Has the training organization established a Quality Manual (QM)?	For ATOs, to be identified as a recommendation in case of non-compliance. For non-ATOs, always an observation if not compliant
7.3	Has the QM been approved /accepted by the State authority?	For ATOs and if it is a requirement of the State, to be identified as a recommendation in case of non-compliance. For non-ATOs, always an observation if not compliant
7.4	Does the Quality Manual covers the following:	
7.4.1	quality policy and strategy	Always observation if not compliant
7.4.2	glossary	Always observation if not compliant
7.4.3	risk management plan	Always observation if not compliant
7.4.4	specified training standards	Always observation if not compliant
7.4.5	assignment of duties and responsibilities of staff for the QMS	Always observation if not compliant
7.4.6	training procedures related to the quality system	Always observation if not compliant
7.4.7	monitoring assessment and testing methods	Always observation if not compliant
7.4.8	monitoring personnel qualifications and training	Always observation if not compliant
7.4.9	monitoring training devices and equipment qualification, calibration and functionality, as applicable	Always observation if not compliant
7.4.10	conducting internal and external audits	Always observation if not compliant
7.4.11	development, implementation and monitoring corrective and preventive actions and associated reporting systems	Always observation if not compliant
7.4.12	use of appropriate statistical analysis to identify and respond	Always observation if not compliant

	appropriately to trends.	
7.5	Has the training organization appointed a Quality Manager?	Or identified someone as being responsible for Quality Assurance? If not, the non-compliance should be identified as a recommendation.
7.6	Does the Quality Manager ensure that personnel training related to the quality system is conducted?	Always observation if not compliant
7.7	Does the Quality Manual include a Quality Assurance (QA) plan?	For ATOs and if absolutely no element of a QA plan is available, to be identified as a recommendation in case of non-compliance. For non-ATOs, always an observation if not compliant
7.8	Does the QA Plan include a reporting system to ensure that suggestions by personnel of the training organization for both corrective and preventive actions are recorded and addressed?	Always observation if not compliant
7.9	Is the QA internal audit programme documented in the following areas?	
7.9.1	the schedule of the internal audit	Always observation if not compliant
7.9.2	internal audit procedures	Always observation if not compliant
7.9.3	planning and preparation	Always observation if not compliant
7.9.4	gathering and recording evidence;	Always observation if not compliant
7.9.5	analysis of the evidence	Always observation if not compliant
7.10	Has the training organization developed a procedure to ensure that persons directly responsible for the activities to be audited are not selected as part of the internal auditing team?	Always observation if not compliant
7.11	Has the training organization implemented a feedback system to monitor and measure the satisfaction of internal and external customers?	Always observation if not compliant
7.12	Is the Management accomplishing a comprehensive, systematic and documented review and analysis of the quality system, training policies and procedures?	Always observation if not compliant
7.13	Does the training organization maintain accurate, complete and readily accessible records documenting the result of the audit programme?	Always observation if not compliant
7.14	Have those records been retained for a period of at least 3 years?	Always observation if not compliant
7.15	Is there consistency between the procedures described in the Quality Manual and the operations of the training organization?	Always observation if not compliant
7.16	Is the Quality System well implemented in the operations of the training organization?	Always observation if not compliant
7.17	Is the QMS fully capable of resolving issues identified?	Always observation if not compliant

8. Safety Management (if applicable)

Ref.	Protocol Question	Comments/Reference
8.1	Is the training organization exposed to safety risks during the provision of its services?	For information
8.2	If yes, has the training organization implemented a Safety Management System (SMS) acceptable to the State that, as a minimum:	Applicable only to ATOs operating aircraft, if the applicant has not implemented an SMS, this should be identified as a recommendation
8.2.1	identifies safety hazards	Applicable to ATOs operating aircraft. Recommendation if not compliant
8.2.2	ensures the implementation of remedial action necessary to maintain agreed safety performance	Applicable to ATOs operating aircraft. Recommendation if not compliant
8.2.3	provides for continuous monitoring and regular assessment of the safety performance	Applicable to Flight Training only. Observation if not compliant
8.2.4	aims at a continuous improvement of the overall performance of the Safety Management System	Applicable to Flight Training only. Observation if not compliant
8.3	Does its SMS clearly define lines of safety accountability throughout the approved training organization, including a direct accountability for safety on the part of senior management?	Applicable to ATOs operating aircraft. Recommendation if not compliant
8.4	Has the training organization developed an SMS Manual?	Applicable to ATOs operating aircraft. Recommendation if not compliant
8.5	Has the training organization appointed an individual to fulfil the duties of safety manager?	Applicable to ATOs operating aircraft. Recommendation if not compliant
8.6	Is this appointment clearly reflected in the organization chart?	Applicable to ATOs operating aircraft. Recommendation if not compliant
8.7	Is the safety manager reporting directly to the head of training or to the accountable executive?	Applicable to ATOs operating aircraft. Recommendation if not compliant
8.8	Does the scope of the safety manager's duties include safety planning, safety programme implementation and the operation of the SMS?	Applicable to ATOs operating aircraft. Recommendation if not compliant