

Information leaflet for ATO management staff

Approve a manual of an ATO – LA/L-TRA/0151

Aim of this document

This document explains how an ATO can submit an initial or a revised manual to the BCAA training department.

There are three different types of ATO manuals:

- Organisation Management Manual (OMM);
- Operations Manual (OM);
- Training Manual (TM).

Organisation Management Manual (OMM)

This manual will describe the general information concerning the ATO, the ATO staff composition, the compliance monitoring system (CMS) and the safety management system (SMS).

For organisation certified for other activities regulated by the European regulation 2018/1139 (i.e. AOC holders), it is not necessary to duplicate the information regarding the CMS and the SMS. The dedicated paragraphs of the OMM may give the references to the applicable manuals such as Compliance Monitoring Manual (CMM), Safety Management Manual (SMM) and the Emergency Response Plan document (ERP).

Operations Manual (OM)

This manual will describe how the ATO will organise the approved training activities.

Training Manual (TM)

This manual will describe how the ATO will provide a specific training. Each training course should be linked to a specific Training Manual. This manual shall explain the ATO training standards.

It is accepted that an ATO developed a "root" training manual, describing the general items that are common to all training activities, and annexes where the specific items for each training are mentioned.

Before being used, each manual must be approved by the BCAA training department. The notification of the approval of a manual is done through the Manual Compliance Checklist and Findings (MCCF). The MCCF will be signed by the BCAA agent and send by email to the organisation. The MCCF is a document that must be completed by the ATO management staff prior introducing the manual for approval to the BCAA. Each manual has its own MCCF:

- OMMCCF LA/L-TRA/0151D51E: Organisation management manual compliance checklist and findings;
- OMCCF LA/L-TRA/0151D52E: Operations manual compliance checklist and findings;
- TMCCF LA/L-TRA/0151D53E: Training manual compliance checklist and findings.

The purpose of the MCCF is:

- To allow the ATO to assess if the manual is compliant with the applicable regulations;
- To have a single working document throughout the approval process.

All MCCFs can be found on our website www.mobilit.belgium.be.

The MCCF documents are built in order to assess the full ATO compliance with Part-ORA requirements. It could be that some items are not applicable to your ATO. The ATO has the possibility, using these documents, to provide an explanation on any items that do not seem to be applicable to the ATO.



The BCAA L-TRA department will not read the manual entirely but will concentrate on items of safety concerns or where regular non compliances are detected.

The ATO accountable manager is the ultimate responsible towards the compliance of any ATO manuals. Therefore a BCAA approved manual does not necessary mean that the manual is 100% compliant towards the applicable regulation and that any amendment may be requested by the BCAA during any subsequent audits or revisions.

All emails sent during this process shall be addressed to BCAA.ATO@mobilit.fgov.be.

STEP 1: Submission of a new/revised manual

The ATO shall submit the new or revised manual by email to BCAA.ATO@mobilit.fgov.be with in "subject" the following information:

- 1. ATO name;
- 2. Procedure reference (L-TRA/0151);
- 3. Name of the manual.

The following documents must be included in attachment to this email:

- The manual in .pdf format signed by the relevant nominated persons with, as file name, BE_ATO-999_Name of the manual_ V9.9_yyyy-mm-dd.pdf where:
 - V9.9: version of the manual;
 - yyyy-mm-dd: the date mentioned in the filename should be the date when the file is sent to the BCAA;
- The completed MCCF in .doc(x) format with, as file name BE_ATO-999_MCCF_Name of the manual_ yyyy-mm-dd.docx where:
 - yyyy-mm-dd: the date mentioned in the filename should be the date when the file is sent to the BCAA.

This must be done either when an ATO introduces a new manual or a revision of an already approved manual.

In case of a revision, the following document must be provided:

- The MCCF completed only for the items where changes were performed (see column 7).
- An abstract of the changes within the manual or on a separate document if needed.

Remark: by changes, the BCAA does not mean cosmetic changes or corrections of typing errors.

An approval page shall be included in the manual and signed by the relevant ATO nominated persons. Remark: the BCAA does no more sign any manual (list of effective pages and/or approval page). The manual is approved through the MCCF approval sheet.

- In the case of an OMM or an OM: the manual must be signed by the AM and the CMM.
- In the case of a TM: the manual must be signed by the HT and the CMM.

The MCCF is a compliance matrix between the ATO manuals and the applicable regulations. All MCCFs can be found on our website www.mobilit.belgium.be.

STEP 2: Assessment of the new/revised manual by the BCAA

If the submitted manual is an update of a manual, the BCAA inspector starts a complete review process described here below in "Case 2".

If the submitted manual is a new manual, the BCAA inspector may decide either to start a spot check process described "Case 1" or a complete review process described in "Case 2".



Case 1 – Spot check process

The aim of the spot check process is to shorten the duration of the first evaluation of a manual and to avoid having to establish too many findings on a bad quality manual.

During this spot check phase, the BCAA inspector assesses and checks the compliance of the manual towards the applicable regulations on a very limited number of selected MCCF items regarding mainly compliance and safety.

If the spot-checked items comply with the applicable regulations in a satisfactory manner, the manual is considered acceptable for the complete review process.

If any of the spot-checked items does not comply with the applicable regulations, the manual is considered not compliant. The BCAA inspector sends an answer stating that the manual is non-compliant with the applicable regulations and asking the ATO to check and rewrite the manual before to submit it again.

NB: in this case, the current request is closed and the revision of the manual will be processed as a new request.

Case 2 - Complete review process

The BCAA inspector, with the help of the initial MCCF, assesses and verifies the compliance of the manual.

In case of non-compliance, a finding will be stated on the MCCF (last part of the document). The intermediate MCCF will be sent to the ATO.

The ATO should then correct the manual according to the finding described in the MCCF and send the corrected manual and the updated MCCF (column 4 of the "Findings" part) by email by responding to the email sent by BCAA.ATO@mobilit.fgov.be.

The following documents must be included in attachment to this email:

- The manual in .pdf format signed by the relevant nominated persons with, as file name, BE_ATO-999_Name of the manual_V9.9_yyyy-mm-dd.pdf where:
 - V9.9: version of the manual;
 - yyyy-mm-dd: the date mentioned in the filename should be the date when the file is sent to the BCAA;
- The completed MCCF in .doc(x) format with, as file name BE_ATO-999_MCCF_Name of the manual_ yyyy-mmdd.docx where:
 - yyyy-mm-dd: the date mentioned in the filename should be the date when the file is sent to the BCAA.

STEP 3: Approbation of the new/revised manual

If all findings are closed, the MCCF will be signed by the BCAA agent and sent to the ATO.

After the reception of the signed MCCF, the new/revised manual is approved and can be used within the ATO.

However, we draw your attention to the fact that this acceptance/approval cannot guarantee the total conformity of the manual to the regulation. As a consequence, if, during complementary studies, the BCAA detectS any error, non-conformity or ambiguity, the organisation will be requested to amend the manual.

Workflow for ATO administrative staff Approve a manual of an ATO – LA/L-TRA/0151

This document shall be made available to any ATO staff member in charge of the submission of documents regarding the above mentioned procedure. It gives an abstract and guidelines of the actions performed for the approval of an ATO manual.

