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TITLE: APPROVAL OF CABIN CREW TRAINING ORGANISATIONS (CCTOS) TO PROVIDE THE INITIAL TRAINING COURSE FOR THE ISSUE OF A CABIN CREW ATTESTATION

The purpose of this Memorandum is to outline the requirements as well as IAA instructions and procedures for the initial approval and ongoing maintenance of Cabin Crew Training Organisations (CCTOs)

This document is issued to provide guidance for training organisations and commercial air transport operators who are seeking approval from the IAA to establish a cabin crew training organisation (CCTO) for the purpose of conducting the Initial Training course and the associated examination outlined in Aircrew Regulation 1178/2011, as amended, Annex V, Part CC

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SECTION 1 INTRODUCTION

Common, comprehensive and detailed requirements, known as European Aviation Safety Agency (EASA) Implementing Rules, have been agreed by Member States of the European Community covering many requirements relating to the safety of commercial air transport (CAT) aeroplanes. These requirements are published in the form of a European Regulation which has the force of law throughout the European Community including Ireland.

One of these requirements, (in the Aircrew Regulation, Annex V (Part CC), CC.TRA.220), is for each cabin crew member to complete an initial training course and to undergo an examination to demonstrate knowledge and proficiency. The training required for this initial course can be provided by an approved cabin crew training organisation or by a commercial air transport (CAT) operator specifically approved by the competent authority to provide such training.

Applicants who have successfully completed an initial approved cabin crew training course and passed the examination are issued with a ‘Cabin Crew Attestation’ (CCA). The CCA is normally issued by the competent Authority, which approved the organisation to provide the training or by the approved organisation itself, when it is approved to do so by the competent Authority. In Ireland the competent Authority is the Irish Aviation Authority (IAA).

A training organisation for cabin crew (CCTO) is considered normally to be a single organisation, staffed, equipped and operated in a suitable environment, offering the practical training and theoretical instruction required for the course provided. The principal place of business shall be in Ireland. Additionally, if training is conducted at other locations, a robust audit and compliance monitoring process must be in place to ensure that such locations meet all requirements.

This document is intended to serve two purposes:

1. To help organisations and operators to ensure that an application made for approval to provide the cabin crew initial training course will satisfy the IAA that the relevant requirements and standards have been met and thereafter will continue to be met.
2. To explain the administrative arrangements which are applicable in Ireland

The IAA expects organisations seeking approval to be in possession of the current, relevant Aircrew Regulation including the associated Acceptable Means of Compliance (AMC) and Guidance Material (GM) and the organisation’s representatives to be familiar with the contents.

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A CCTO may make training arrangements with other training organisations or providers but must ensure that these other organisations comply with the appropriate requirements. Where training is provided at multiple locations all sites may be subject to inspection. The CCTO’s head of training (HOT) is responsible for training standards and compliance with the applicable requirements. This applies even if a sub-contracted organisation may also have been approved or may be utilised to provide some parts of the training

A cabin crew initial training course may only be provided by the CCTO approved by the IAA. The training course may not be provided by any third party operating outside the scope of the approval. Any proposed changes to the approval (including any changes to the organisational structure) shall be notified to and approved/accepted by the IAA.

NOTE 1: CCTO applicants should understand that the CCTO approval issued by a competent Authority of a Member State is limited to the provision of the Cabin Crew Initial Training course and associated examination, leading to the issue of the Cabin Crew Attestation (CCA). No additional items of training are included under this approval.

NOTE 2: Additional crew training and qualification requirements such as aircraft type specific and conversion training, as specified in EC Reg. 965/2012 as amended (Part OPS), are directed at Commercial Air Transport operators and are not included in the scope of the CCTO approval. A CCTO may only provide aircraft type specific training and conversion training if contracted to do so by an AOC holder/operator, who will remain responsible for the training and competence of its cabin crew.

NOTE 3: CCTOs may not use the IAA logo or corporate branding to advertise or publicise their IAA approval to conduct the Part CC initial training course. CCTOs who engage in activities, other than the provision of the Part CC initial training course, may not use the IAA approval, logo or corporate branding for any advertising or promotional purposes associated with these additional activities.

SECTION 2 OBTAINING APPROVAL – THE APPLICATION PROCESS

Considerable resources and effort are required to prepare an initial application for approval to conduct training, particularly in relation to the development of the required documentation. Equally, the review of such material is demanding of staff effort within the relevant departments of the IAA and must take its place beside other work undertaken. Therefore, organisations should make realistic assumptions from the outset as to how long it will take to obtain approval and applicant organisations are strongly recommended to inform the IAA of their intentions at an early stage of planning. It is strongly recommended that applicant CCTOs intending to make an application for an approval arrange in the first instance a face-to face meeting with a representative of the Flight Operations Department of the IAA to discuss the details of the approval process.

The IAA will only approve courses prepared and delivered in the English language. All course material and documents should be in English. CCTOs should ensure that trainees, for whom English is a second language, have an adequate understanding of spoken and written English before admitting them to a course. (See also IAA OAM 09/05).

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An applicant CCTO seeking approval to provide the Cabin Crew Part CC Initial Training should apply to the IAA, using the relevant CCTO application form available on the IAA website and available also by clicking the following link

[https://www.iaa.ie/personnel-licensing/pilot-licences-\(eu-regulations\)/cabin-crew-1/cabin-crew-training-organisations](https://www.iaa.ie/personnel-licensing/pilot-licences-(eu-regulations)/cabin-crew-1/cabin-crew-training-organisations)

The application should be accompanied by the appropriate fee, current at the time of application.

The application should include the following documentation as a minimum:

1. A detailed business plan including auditor’s evidence of financial viability and an estimate of projected training activity for a 24 month period, following approval.
2. Detailed proposed management structure and post holder(s) CVs.
3. CCTO Operations Manual containing: (See also Section 7 of this document)
 - Organisational structure and the responsibilities of key personnel
 - Eligibility criteria for applicant trainees to be accepted on the training course
 - All information given to trainees during the course
 - Manual amendment process
4. CCTO Training Manual containing: (see also Section 7 of this document)
 - The training and qualification criteria for CCTO personnel
 - Course syllabi and methodology/procedures for instructors and trainees
 - Procedures for the conduct of examinations and record keeping
 - Manual amendment process
5. Compliance Monitoring Manual containing:
 - Compliance Monitoring /Oversight procedures for CCTO activities
6. Safety Management Manual containing:
 - A description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy and
 - The identification of safety hazards entailed by the activities of the organisation, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;
7. List of external facilities to be used on the course - (to include copies of lease agreements, rental contracts etc., where applicable).
 - Swimming pools
 - Cabin simulator training devices

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- Fire training simulators etc...

8. Description of accommodation and facilities - (to include copies of lease agreements, rental contracts etc., where applicable)
 - Classrooms
 - Instructor and trainee facilities
 - Administration facilities
 - Number of staff and trainees that can be accommodated
 - Statement that the facility is adequately lit, ventilated and free from external noise and distractions
9. List of instructors and examiners, their qualifications and currency
10. Evidence of continuing availability of equipment, facilities and instructors
11. Samples of training course documentation:
 - Attestation documentation including responsibility for retention of records
 - CCTO training records
 - A sample certificate of successful “Completion of Cabin Crew Initial Training Course and Examination”
12. At least two sample examination papers for the final exam and each training module, as applicable

NOTE 4: The applicant CCTO will not be required to duplicate submission of information relating to the above items if the information is already included in another document submitted, e.g. Training Manual

NOTE 5: As part of the initial and continuation of the CCTO approval, all of the above items may be subject to IAA audit and site inspections (including any sub-contracted activities).

SECTION 3 CCTO APPROVAL

Subject to satisfactory audits and inspections, a CCTO approval under the direction of the Head of Training will be issued. The approval will remain in place, subject to ongoing inspection and audit and the appropriate annual approval continuation fee.

The IAA may re-inspect the CCTO at any time during the period of approval. Reports will be provided to the CCTO following inspection visits by the IAA.

Continuation of an approval is not automatic and is dependent upon the organisation’s ability to remain compliant with the requirements.

An approval issued by the IAA may be limited, revoked or suspended if the requirements cease to be met in part or in full or if the standards on which the approval was granted are not maintained. Should there be a failure to meet the requirements or standards, the organisation will be formally notified of the non-compliance(s). Remedial action, to include a root cause analysis, correction and follow up actions will be identified and

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agreed within specific timescales. Should the CCTO fail to meet the standards in the specified time; limitation, revocation or suspension of the approval may be considered.

If an approval is revoked and the CCTO wishes to reapply for renewal of this approval, then the initial application process must be followed and the relevant fees will apply.

SECTION 4 PERSONNEL REQUIREMENTS

An adequate number of qualified, competent personnel should be employed and the management structure should ensure supervision of all grades of personnel by persons having the experience and qualities necessary to ensure the maintenance of high standards. The IAA will place particular emphasis on the qualifications and competence of all training staff in their area of specialisation and in training techniques.

(1) The Accountable Manager:

An Accountable Manager shall be nominated by the applicant organisation and be acceptable to the Authority. This person should have experience in aviation and a sound managerial capability. Previous management experience is essential. The Accountable Manager shall have authority and responsibility for ensuring that all activities can be financed and carried out in accordance with the applicable regulations. The Accountable Manager shall be responsible for establishing and maintaining an effective management system for the CCTO. Any proposed changes to the nominated Accountable Manager should be notified to the Authority in advance of appointment.

NOTE 6: Applicable to CAT Operators: The Accountable Manager for the CCTO can be the same Accountable Manager, nominated in the operator's management system.

The Head of Training (HT)

A Head of Training (HT), acceptable to the Authority shall be nominated. This person has the overall responsibility to ensure that the training is in compliance with the requirements. The HT should have sound managerial capability and management experience within aviation. The HT should be trained in instructional skills and have extensive training experience as an instructor within Commercial Air Transport (CAT) Operations.

NOTE 7: Applicable to CCTO non - CAT operators: In addition to the criteria outlined for the HT above, the nominated HT should have extensive experience as an instructor of cabin crew in CAT operations, should be a current CCA holder and CCTO training course expert. In order to ensure continuity of the required training standards and ongoing compliance with the relevant requirements, a deputy to the HT should also be appointed. This deputy can be the CCTO Chief Instructor who should be a current CCA holder and CCTO training course expert. As a minimum, at all times, either the HT or his/her deputy should be a current CCA holder.

NOTE 8: Applicable to CCTO - CAT operators: In relation to the criteria outlined in paragraph (2) above, the nominated HOTO for the CCTO can be the same HOTO, nominated in the operator's management system. In this case, the HOTO and his /her deputy are likely to be operational pilots

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who do not hold current CCAs. Therefore, a CCTO Chief Instructor who is a current CCA holder and CCTO training course expert should be appointed.

(2) The CCTO Chief Instructor (CI)

This person should be a current CCA holder and CCTO training course expert. The CCTO CI should have a direct report line to the nominated Head of Training of the CCTO.

NOTE 9: The CCTO should outline in its Operations/Training Manual the additional qualification criteria it deems necessary for persons holding the positions of Head of Training, Deputy Head of Training and Chief Instructor in order to ensure that these persons have the required skills, competencies and experience levels for the execution of their assigned tasks. Such procedures must be acceptable to the Authority.

(3) The Compliance Monitoring Manager should have a background and management skills in Compliance Monitoring and experience in aviation. Experience in a training environment and training in instructional skills are desirable.

NOTE 10: CAT operators: The Compliance Monitoring Manager can be the same Compliance Monitoring Manager, nominated in the operator’s management system.

(4) The Safety Manager should have a background and management skills in Safety Management Systems and experience in aviation. Experience in a training environment and training in instructional skills are desirable.

NOTE 11: CAT operators: The Safety Manager can be the same Safety Manager, nominated in the operator’s management system.

(5) Instructors

Instructors should possess current or previous experience as a cabin crewmember within CAT operations, preferably at Senior Cabin Crewmember (SCCM) level. They should be trained in instructional skills and possess extensive training experience as an instructor of cabin crew in the field(s) of their competency in a cabin crew training environment with a CAT operator.

In order to ensure on-going familiarity and currency with the required course material, instructors who are involved in the delivery of general aspects of the cabin crew training course should be current CCA holders.

When appointing instructors, the CCTO should consider, before appointment that applicant instructors prove their competency by giving a test lecture based on material they have developed for the subjects they are to teach.

Note 12: The above requirement does not preclude a subject matter expert from being authorised to instruct on matters that deal with their area of expertise. Separate/additional qualification criteria may be required for subject matter experts, as relevant to the particular subject to be covered.

CCTOs should make provision for continuity in cases where the nominated responsible

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person(s) for Training (HT) or Chief instructor (CI) becomes unavailable.

Should the Head of Training cease to be employed by the CCTO, an application for change to the CCTO approval will be required. The IAA must be informed of the departure or intended departure of the Head of Training. In these circumstances, CCTOs should make appropriate arrangements for continuity and the appointment of a new Head of Training should be made as soon as possible. The acceptability to the IAA of an intended appointee should be confirmed before the appointment is made.

Sufficient instructors must be employed to ensure the proper continuity of training for all trainees attending the course. All instructors must be suitably experienced and qualified for the training elements to be covered. They must keep their qualifications current in accordance with the requirements of the CCTO’s approved training manual.

SECTION 5 TRAINING STANDARDS

The IAA requires that adequate arrangements are put in place by the Head of Training for the standardisation of instructors and the provision of instructor briefing material. Such arrangements should be detailed in the Training Manual.

Arrangements are to be made for periodic standardisation and checking of instructors. Such training and checking is to be recorded by the CCTO and will be subject to internal audit by the organisation’s Compliance Monitoring system.

SECTION 6 TRAINING MANUAL AND OPERATIONS MANUAL

The CCTO should establish and maintain a Training Manual and an Operations Manual containing information and instructions to enable personnel to perform their duties and to give guidance to students on how to comply with course requirements.

The CCTO should make available to its personnel and, where appropriate, to students relevant information contained in the training manual, the operations manual and the CCTO’s approval documentation.

The training manual should state the standards, objectives and training goals for each phase of training that the students are required to complete and should address all items included in Aircrew Regulation, Appendix 1 to Annex V of Part CC.

The content and sequence of the training programme should be specified in the training manual.

The detailed training syllabus shall be documented in the training manual and instructor

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course notes shall be issued and controlled by the HT / Chief instructor.

SECTION 7 RECORDS

The format of Training records should be specified in the Training Manual and should comply with formats acceptable to the IAA.

The Head of Training of the CCTO or his/her deputy is required to certify that each applicant for a Cabin Crew Attestation (CCA) has successfully completed all elements of the required initial training course and passed the associated examination. This certification can take the form of a “Part CC Initial Training Course Completion Certificate.”

Any such documentation, which is required in order to issue the Attestation, should be in accordance with the requirements of IAA Personnel Licensing (PEL) and be acceptable to the IAA.

A responsible person within the CCTO should be nominated to take responsibility for Attestation procedures and to liaise with IAA Personnel Licensing, concerning the issue of CCAs and all CCA matters.

Attestations shall be issued by the IAA or by an organisation approved to do so on behalf of the IAA, to successful candidates, upon successful completion of the required training and associated examination and provided all documentation has been satisfactorily completed and, if applicable, when the appropriate fee has been paid in advance of CCA issue.

The CCTO shall retain all relevant records for a minimum of five years.

SECTION 8 THE TRAINING MANUAL AND TRAINING PROGRAMME

The Training Manual will state entry requirements for the course. Before accepting applicants onto a training course, CCTOs shall ensure that applicants meet the eligibility criteria outlined in Annex V Part CC. CCTOs should also inform training course applicants that they will be required to comply with the medical requirements for cabin crew outlined in Annex IV, Part MED, in order to exercise the privileges of their cabin crew attestation.

The Training Manual will include the standards and objectives for each module that the trainees are required to complete. The length and amount of training appropriate to the course should be designed for a trainee with the minimum entry requirements as detailed in the Training Manual.

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The training course content should enable trainees to become familiar with the aviation environment and acquire sufficient general knowledge and basic proficiency required to perform and discharge the responsibilities related to the safety of passengers and flight during normal, abnormal and emergency operations. The course content should be based on generic information and procedures and offer a range of examples relevant to typical operations within the aviation industry. It should not refer to a specific aircraft type and it should not refer exclusively to a specific AOC holder’s operational requirements. The programme of the initial training course shall cover at least the elements specified in Appendix 1 to Part CC of Annex V of the Aircrew Regulation 1178/2011, as amended.

As a general rule, the entire programme of Initial Training should be a minimum of 70 hours tuition, with training days of up to 8 hours duration including lunch/refreshment breaks. In reality, this figure is normally exceeded. The minimum 70 hour figure assumes that the training will be conducted on a full time basis and over a consecutive period.

CCTOs who wish to propose alternative arrangements for the delivery of the training programme should consult with the IAA. In all circumstances CCTOs should ensure that the entire programme of initial training is completed within a 12 week time frame.

Due to the nature of the training course and the lack of familiarity of the majority of trainees with the subject matter to be covered, the emphasis of training should be placed predominantly on a combination of instructor / facilitator led training for both the theory and the practical elements of the training course.

Training Methodologies may include theory-based classroom training, home study, CBT, individual e-learning, distance learning and practical training. Other methodologies may also be acceptable to supplement the learning process.

If used, individual e-learning, distance learning and home study should be utilised primarily for pre-course study and consolidation of training but not normally as a substitute for classroom based instructor-led training. Where such training methodologies are used, the CCTO should ensure that the trainees have access at agreed times to a suitably qualified instructor who is able to assist with any areas of difficulty for the trainee.

The theoretical training should take place in a suitably equipped classroom. Classroom accommodation should be available either at the principal place of business of the CCTO or within a suitable facility elsewhere.

Practical training should include actual practice by each trainee in both individual and group exercises and using actual equipment or representative training devices, as documented in the Initial Training programme syllabus outlined in Aircrew Regulation, Appendix 1 of Part CC, Annex V.

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The training devices used by an organisation should realistically represent the passenger compartment of typical aircraft type(s) and the technical characteristics of the equipment to be operated by the cabin crew.

SECTION 9 THE EXAMINATION PROCESS

Applicants for a cabin crew attestation shall undergo an examination covering all elements of the training programme, except for CRM training, to demonstrate that they have attained familiarity with the aviation environment and have acquired sufficient general knowledge and basic proficiency required to perform the duties and discharge the responsibilities related to the safety of passengers and flight during normal, abnormal and emergency operations.

Accordingly, the CCTO providing the training should establish its own criteria for the conduct of the examination process using the guiding principles identified below:

- I. The examination process may include written/multi-choice/practical and oral assessments. Combinations of these assessment methods are also possible.
- II. The examination may be conducted -
 - as one final examination upon completion of the initial training course
 - on a modular basis upon completion of each of the initial training course module
 - using a combination of both modular and final examination.
- III. The examination process may include practical and oral assessments, where applicable.
- IV. Where a multi choice examination format is the only method used for the final examination, a minimum of 50 questions should apply.
- V. Where the CCTO uses oral and/or practical assessments as part of the examination process, such assessments should supplement and not replace the written /multi choice assessments. A maximum of 25% of the total examination quota should be awarded to oral and/or practical assessments, leaving the remaining 75% for written/multi-choice assessments.
- VI. Open book examinations are not acceptable.
- VII. CRM skills should not be examined in written/multi choice/oral or practical assessments. However, a check for understanding of basic Human Factors in aviation and general CRM principles and objectives may be included in

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written/multi-choice assessments.

- VIII. The examination should include only those training elements required in the initial training course. It should not include other elements of training, which are not part of the initial training course syllabus e.g. aircraft type training, customer service training etc.
- IX. The CCTO should have a number of different examination papers, so that trainees cannot predict the examination questions/answers.
- X. The pass/fail /resit criteria should be determined by the CCTO.
As a guiding principle, candidates who will be issued with an Attestation should aim to attain a minimum of 90% overall success rate in the entire examination process.
- XI. Where a trainee fails to meet the required standard, the re-sit examination paper(s) should be different from the original examination paper(s).
- XII. The CCTO should ensure that the conduct of the examination(s) is executed by personnel who are qualified for this purpose and free from conflict of interest.

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