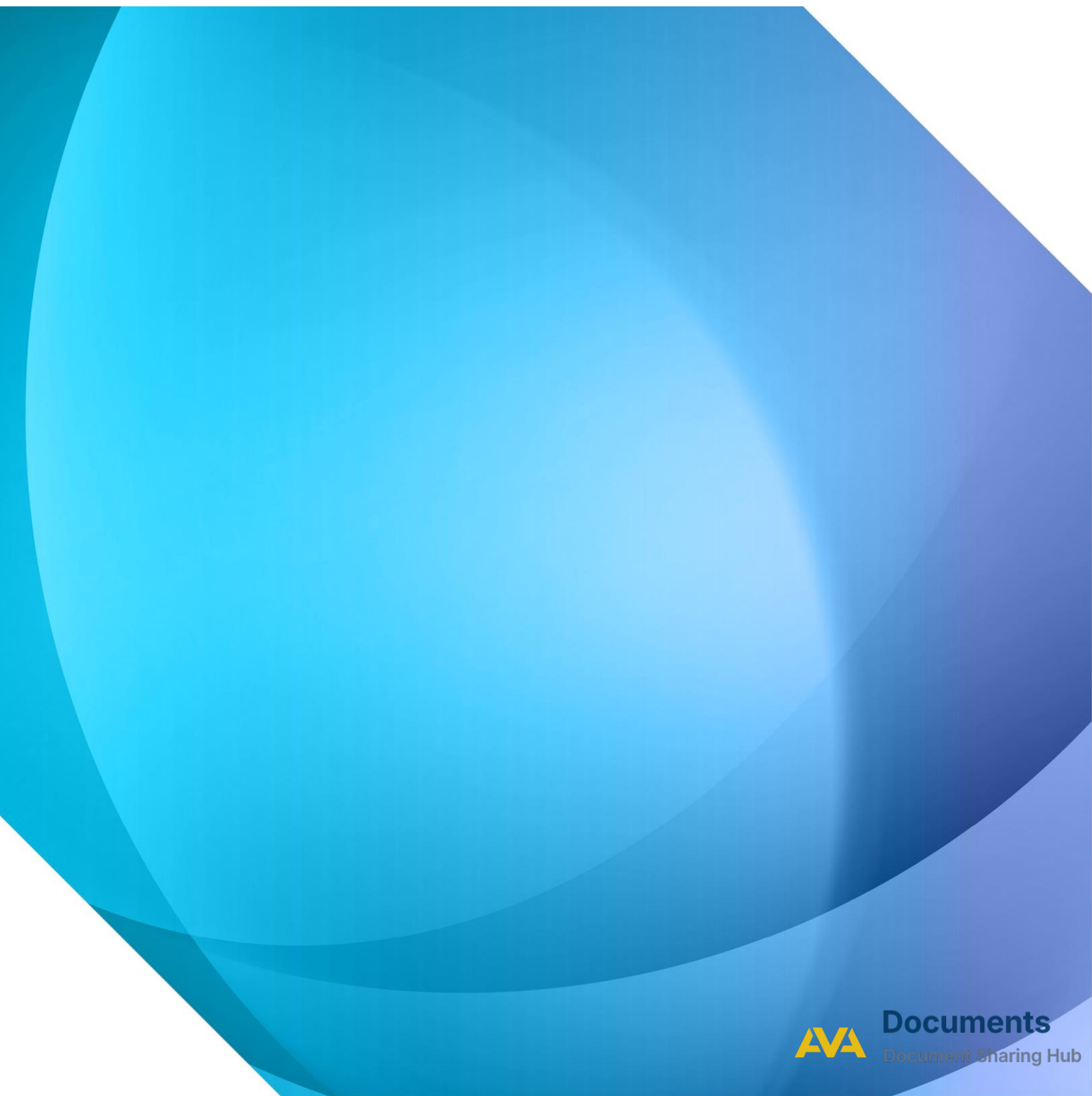


Understanding the CAA Quality Assurance Framework

CAP 2204



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The latest version of this document is available in electronic format at: www.caa.co.uk

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Prelims

The Quality Assurance Framework is applicable to aviation security training required by the UK National Aviation Security Programme (NASP). It does not cover other training such as safety or dangerous goods which are managed by different departments within the CAA. The framework is focused on the quality of training, whilst the assurances of compliant training are completed by the CAA AvSec Compliance Team.

The Quality Assurance Framework was developed with adult education professionals and industry stakeholders to produce a framework that meets the needs of industry whilst allowing the CAA to professionalise training and obtain oversight. An industry wide stakeholder consultation was completed in 2017 and the framework was launched in April 2019.

The Quality Assurance Framework is comparable to the CAA Security Management Systems (SeMS) process in that it observes how providers ensure their own quality assurance standards are met and how continuous improvement is implemented within training. The CAA have no plans at present to change how existing compliance audit activities are undertaken with respect to training. Only DfT approved aviation security syllabuses in scope fall under the Quality Assurance Framework. Whilst some of the aspects reviewed by Ofsted and Ofqual may be familiar or similar, they are nationally recognised standards which are considerably higher than those implemented by the Framework

The framework is designed around six aspects with various elements within each aspect. These aspects are fundamental to any training framework and elements focus on the implementation and quality of policies and procedures, session plans, a quality assurance strategy, and trainee data management. Elements are split into 'Critical' and 'non-critical' elements. 'Critical' elements are fundamental to any quality assurance framework and carry more weighting in the overall grade achieved.

This publication may be used to meet the Quality Assurance Framework (QAF). It provides specific information on the criteria and requirements of the framework to achieve both 'Good' and 'Outstanding' across all elements of the framework. There is also more information on how to plan for a CAA visit, timescales and expectation setting for the visit. The criteria the CAA will use to make decisions during your visit are also explained within this document to help you better understand the framework.

Where guidance references specific documents and evidence that should be presented as part of a training provider's framework; exemplars, further information, and support can be found in **CAP 2203 – Quality Guidance Manual** on the CAA website. You do not have to use the publication and it is there for guidance only. Data trends suggests that providers that have used the guidance have found it useful and gain a better overall understanding

of the framework and evidence required. The exemplars can be modified to meet your own needs. If your existing materials are fit for purpose, please do not change these unnecessarily.

The **Self-Assessment Report (SAR) form** available by contacting the CAA may also support a training provider in meeting the CAA framework requirements and criteria. Annex C & D may also support providers planning for their visit.

Please contact: avsec.qa@avsec.caa.co.uk for queries or further information.

Chapter 1 provides more information on the overall framework, registration and the visit. Chapter 2 explains each element of the framework and what is expected of you as a training provider. This is written for providers not in-scope of the framework or those planning for their first visit. If you have received your first visit, you should also review chapter 3 which explains the differences between your 1st and next visit.

The appendices contain useful information about the framework and are referenced within this publication.

Quality Guidance Manual – This publication on the CAA website provides guidance and exemplars to meet the explanations and requirements of the framework contained within this publication.

Revision history and effective pages

This is version 1 of a new publication incorporating several documents previously available on the CAA website and on request to the CAA. It provides guidance on the specifics of the CAA Aviation Security Quality Assurance Framework for aviation security training. It also provides guidance on how to meet aspects and elements of the framework and the documents that should be considered for use and submitting to demonstrate how a training provider meets the CAA framework.

The document incorporates previous written text specific to the CAA Quality Assurance Framework which was previously available in version 2 of the **Quality Guidance Manual**. **CAP 2203 Quality Guidance Manual** version 3 focuses solely on guidance and exemplars to support training providers in producing evidence to meet the framework.

In addition, this document incorporates previous documents on the CAA website of:

- Visit expectations
- Grade matrix 1st visit
- Grade matrix 2nd Visit
- PBO Guidance document
- Frequently Asked Questions (FAQs)

Chapter 1

Understanding the CAA Framework - Overview

Registration

It is a regulatory requirement that UK national aviation security training is undertaken by a registered training provider. Instructors certificated to deliver this training, must be linked to at least one training provider at all times. Where an instructor is not linked to a registered training provider they will be suspended from the CIN list until such time they inform the CAA they are linked to a provider. Appendix B provides more information on who must register as a provider.

All CAA-Registered Training Providers are required annually each April to re-register for the new Quality Assurance Framework Year. New providers will need to contact avsec.qa@avsec.caa.co.uk to register their interest. There is an annual charge for registration. Please contact the CAA for more information.

Not all syllabuses are in scope-of the Quality Assurance Framework and providers will be informed at registration and in CAA updates which training is in-scope of the framework. Providers in scope must undertake the requirements of the CAA Quality Assurance Framework. Those not in-scope are recommended to familiarise themselves with the requirements and begin planning.

Where a provider has a number of training sites, there is only a requirement to register once and undertake one visit. There must be one overarching quality assurance process in place which is the same for every site - there is no limit to the number of sites. Additionally where an entity contracts their training to a third party provider they are not required to register for the framework as this is the responsibility of the 3rd party training provider.

A Certificated Instructor may be linked to multiple providers and this must be reflected in all providers' registrations. They will not necessarily have to be involved in the CAA visit; however there will be a sampling of instructors' records and activities during the visit as part of the overarching quality assurance strategy/plan the provider has implemented. Only aviation security training under UK NASP syllabuses are covered by the Quality Assurance Framework. If you do not train any of the syllabuses covered by this (where a CIN or RoC is required) you do not need to be part of the QAF.

Any instructors who are not linked to a CAA-Registered Training Provider will not be certificated: Directed parties are required to use CAA-Registered Training Providers or entities recognised as competent only.

It is a requirement that training providers notify the CAA when their details change, an instructor requires de-linking, or new instructors joins the training provider. This can be

completed using a 'Change of Details' form on the CAA website. Where a Certificated Instructor is de-linked we will contact them to explain the process to link to another provider or suspend their CIN until such a time they link to another registered provider.

New providers – Newly registered providers will be advised if they are in-scope of the QAF. Those that are, will have 6 months to deliver at least 1 training course from a syllabus and implement their quality assurance strategy/plan. A CAA visit will then be undertaken.

Independent Instructors

This is defined as a single instructor who works alone and never works with others when delivering training designed by them.

Independent training providers are permitted to deliver training and assessment contracted by a different training provider as long as they fall under the umbrella of that provider. Where an independent instructor only ever works for other providers, they may want to consider not registering as their own provider as they will be covered by the other providers' framework that they deliver training for.

If an instructor is linked to (a) provider/s, the provider/s will take responsibility for the quality assurance activities on that instructor. During a visit from the CAA we may ask for documentation to evidence that they have been quality assured and follow all policies and practices they are in place.

It is not acceptable to ask a CAA-Registered Training Provider to link your CIN to them and have no other interaction/involvement with them. If this is discovered an investigation will take place and sanctions may be sought against both the provider and Certificated Instructor in line with the CAA malpractice policy.

Guidance for ASIO - Certificated Instructors who are only conduct training on behalf of the DfT (e.g. overseas as part of ASIO) will fall into the Quality Assurance Framework and will need to register as a provider or be linked to a CAA-Registered Training Provider.

Certain elements of the framework are not applicable to independent instructors and this is taken into account in year 1 on the **Self-Assessment Report (SAR) form** and during the CAA visit. Independent instructors are expected to meet all elements of the framework for PBO visits. The input of others such as quality assuring an independent instructor's training delivery may be required. We would recommend that you consider conducting these aspects through peer review with other instructors, friends, stakeholders etc.

Aspects and elements

The framework is split into 6 aspects containing a number of elements. Certain elements are classified as ‘critical’ –fundamental building blocks of internal quality assurance. These provide a focus for training providers new to the framework. ‘Critical’ elements are required to be graded overall as ‘Good’. ‘Non-critical’ elements can be graded ‘Requires Improvement’ and still allow a training provider to be graded ‘Good’ overall.



Overall Grades

The overall grade following a visit is defined by the number of critical and non-critical aspects graded each on the report. These will be graded as either ‘Requires Improvement’, ‘Good’ or ‘Outstanding’. Note: ‘Good with Outstanding Features’ is only awarded as an overall grade and is not part of the grading for each individual element.

Requires Improvement	One or more critical element or more than five non-critical elements ‘Require Improvement’,
Good	All critical elements are at least ‘Good’ and no more than five non-critical elements ‘Require Improvement’.
Good with Outstanding Features	No elements ‘Require Improvement’ and at least five elements are ‘Outstanding’
Outstanding	All elements are ‘Outstanding’ however a maximum of 5 non-critical elements can be Good

The overall grade achieved will determine the frequency of the next visit date. Following a year 1 visit all visits regardless of grade will receive their second visit within 12 months. The following table explains how the frequency is determined. **Appendix C&D** may support you in understanding how overall grades are calculated.

Overall grade	Year 1 visit	PBO (Year 2+) visit ¹
Requires Improvement	Actions set in critical elements - desktop review with CAA within 3 months. Following re-grade to at least 'Good' next visit will be undertaken in 12 months	Review actions and feedback provided for re-visit in 6 months
Good	Review actions and feedback provided for re-visit in 12 months	Review actions and feedback provided for re-visit in 12 months
Good with Outstanding Features	Review actions and feedback provided for re-visit in 12 months	Review actions and feedback provided for re-visit in 18 months
Outstanding	Review actions and feedback provided for re-visit in 12 months	Review actions and feedback provided for re-visit in 24 months

1st Visit providers who are graded 'Requires Improvement' will be set actions by the CAA to achieve 'Good'. They will then have three months to achieve these actions and submit evidence to the CAA for review. A new report will be produced and a revised grade provided. PBO providers will be revisited in 12 months and there is no option for a desktop review. If after a desktop review a 1st visit provider is 'Requires Improvement' the CAA may organise a meeting to discuss available options. As a last resort the CAA may require the provider to de-register from the framework until such a time that as they are able to reach at least 'Good' overall.

Syllabuses may contain mandatory conditions requiring a grade to be achieved in the QAF to continue to deliver the syllabus. Where this is the case 1st Visit providers will be given an opportunity to complete a desktop review. This will follow the same process as above for 'Requires Improvement' providers. For PBO providers who do not meet the grade required by a syllabus an additional visit will occur within 6 months. If an improved grading is not evident following a second visit, the CAA will organise a meeting to discuss further options including the removal of the syllabus from the training programme.

You may be given an indication of the overall grade at the end of your visit. This will be subject to confirmation and the CAA's internal quality assurance programme. The confirmed overall grade will follow five working days after your visit.

¹ Visits can occur earlier should concerns be raised by Compliance Auditors, the AvSec Training Team or via Whistleblowing channels.

CAA External Quality Assurers (EQAs)

The QAF focuses on the quality of training, assessment and internal processes rather than compliance to regulation. Therefore the framework uses staff who are experts in this field rather than the CAA Compliance Auditors who are experts in regulation compliance.

External Quality Assurers (EQAs) are employed by the CAA to undertake visits and they are security cleared to view official sensitive material. They are experts in their field of training and quality assurance. They all have backgrounds in adult education and training. They have also received training in aviation security terminology and have access to UK NASP Training syllabuses. CAA EQAs aim to create a supportive environment with you and will make judgements against a series of set criteria. In addition they will also give recommendations and support to you for consideration.

Visit Expectations

The CAA will assist training providers in being able to demonstrate their internal quality assurance processes in order to meet the Quality Assurance Framework. The following may support you.

Preparing for your visit

Prior to your visit your EQA will:

- contact you to discuss the remote visit and answer any questions
- ensure you have access to an email account/web based software and contact you through these accounts
- conduct a test with you to ensure that email/web based video software will be suitable to undertake the remote visit
- ask you to send evidence in advance of the visit date (if applicable)

In preparation for your remote visit, please collate the evidence you wish to present into six files. Use the **Self Assessment Report (SAR) form** as a guide to identifying evidence you need and ensure you submit your **SAR** (and quality assurance strategy/plan (PBO only)) to the CAA at least 14 calendar days before your scheduled visit.

The focus of the visit is on your overarching processes; you will only need one visit per year. During the quality assurance visit your EQA will only sample materials from syllabuses which have been updated and are in-scope – any materials relating to syllabuses due to be reviewed at a later stage will only be subject to sampling once the syllabus is in-scope. You only require one visit for all the syllabuses you deliver and the EQA will select a syllabus in scope to sample materials from.

You should plan who will attend the visit. Your instructors do not necessarily need to attend though your key staff members should be available e.g. the Quality Manager and

any other staff that you require to produce documentation and evidence processes. You are welcome to have as many people as you need for the visit.

‘Live’ training will not be observed/ monitored by the EQA. The EQA will be assessing the quality assurance process behind the training, not the actual training. They will be reviewing observation reports that you have completed on your instructors as part of your quality assurance strategy.

If you are a training provider with multiple sites across the country you will only require one visit as long as you have one overarching quality assurance process in use for all sites. You should consider collating documentary evidence from each site as the EQA may ask to review this to ensure each site is consistent in its approach and quality assurance is being undertaken at all sites. This does not mean you need to consider having IQAs at each site, and you may choose to send an IQA to a site in line with your quality assurance strategy/plan to undertake monitoring activities as required.

Self-Assessment Report Form (SAR)

The **Self-Assessment Report (SAR) form** should be completed by the person(s) responsible for quality assurance within your training provider. The SAR should be used to assess internal quality assurance processes and practices within your training provider to identify any gaps or improvements required. In year 1, there is no need to send any documents with the SAR form. For training providers in **phase PBO you will be required to send your quality assurance strategy/plan with your SAR**. The SAR should identify the documents (paper or electronic) that will be available for review at the quality assurance visit. The SAR must be submitted to the CAA at least **14 calendar days** prior to the scheduled visit. Failure to complete this action could lead to cancellation of the visit and charges incurred. The CAA will contact you to discuss the circumstances and may suggest cancelling the visit.

Please provide as much detail as possible on the form to assist the EQA in understanding how the documentary evidence meets the framework. PBO visits also require a reflection on strengths and areas for improvement. The EQA will use your SAR to request documentation and begin discussions during your visit. It will allow them to understand your provider in advance of meeting you and which grades you have assessed as achieving. It also allows you to understand your own strengths and weaknesses prior to the visit and ensure critical areas meet at least ‘good’.

Guidance - Training providers must ensure they plan in advance to complete the SAR as it may take time to complete the report and identify the evidence that is required for the visit.