

Quality Assurance Framework

QAF 003 Policies



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01/05/2020	8	Review of all policies and addition of remote working policy. Typographical errors corrected and reference to days notice ammended to calendar days. Training Provider replaced with CAA-Registered Training Provider throughout. Addition of section 11 – Remote Visits and section 12 – Contacting the CAA.

QAF 003 Policies
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Version 8 May 2020
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Aviation Security Acronyms and Terminology

AvSec	Aviation Security
CAA	Civil Aviation Authority
CIN	Certificated Instructor – by Department for Transport (DfT) to deliver AvSec training syllabuses
DfT	Department for Transport – Government department which sets aviation security policy and is appropriate authority in the UK
EQA	External Quality Assurer - the term is used throughout the framework to refer to our group of externally appointed quality assurance staff
FAQs	Frequently Asked Questions
GDPR	General Data Protection Regulation
IQA	Internal Quality Assurance/ Internal Quality Assurer
JPEG	Image / Picture file type
NASP	National Aviation Security Programme
PBO	Performance Based Oversight
PDF	File type which protects a document from unauthorised editing
PPE	Personal Protective Equipment
QA	Quality Assurance
QAA	Quality Assurance Administrator
QAWG	Quality Assurance Working Group
RoC	Recognition of Competence
SAR	Self-Assessment Report form
SeMS	Security Management Systems
Visit	The term used to describe the day the activity between the CAA-Registered Training Provider and External Quality Assurer is undertaken. This can be face to face or via a remote visit using phone, email and web based video software.

1. Appeals Policy

1.1 Scope

This policy applies to the CAA, EQAs (External Quality Assurers) and CAA-Registered Training Providers under the aviation security training Quality Assurance Framework. It should be read in conjunction with all other policies:

- Malpractice Policy
- Complaints and Whistleblowing Policy

An appeal is a request from a CAA-Registered Training Provider to revisit the CAA's decision which the CAA-Registered Training Provider considers is disadvantaging them.

This policy sets out our commitment to CAA-Registered Training Providers who wish to enquire, question or appeal against a CAA decision.

1.2 Our commitment

The CAA will show transparency and fairness in our Quality Assurance Framework practices by allowing any CAA-Registered Training Provider who feels this is not achieved, the right to appeal.

1.3 Our procedures

The CAA provides CAA colleagues including EQAs with the expertise needed to comply with this policy and related procedures.

The CAA provides CAA-Registered Training providers with details of how to appeal a decision. This includes:

- contact details of a designated post holder;
- the timescales for any investigation to be undertaken;
- the timescales for the outcome to be communicated;
- the process to follow if the outcome is deemed to be unfair, including the ultimate right of appeal with the CAA.

The CAA have clear, consistent and transparent procedures for CAA-Registered Training Providers to enable them to enquire about, question or appeal a decision, including requests for reasonable adjustments or special consideration.

The CAA provides information to CAA-Registered Training Providers on the CAA website of the contents of this policy and related procedures. Any appeal received is recorded, documented and retained for 3 years following the resolution of the appeal.

The CAA maintains confidentiality of any CAA-Registered Training Provider's information related to an appeal.

The CAA takes appropriate action to protect the interests of other CAA-Registered Training Providers and the integrity of the Quality Assurance Framework, when the outcome of an appeal questions the validity of other CAA-Registered Training Providers' results.

The CAA monitors our compliance with this policy by collecting data through CAA-Registered Training Provider registrations, CAA colleague applications, feedback and outcomes.

1.4 Supporting documentation

- Appeal against a CAA Decision Form available on the [CAA website](#)

1.5 The appeal process

If a CAA-Registered Training Provider wishes to appeal the decision made by the CAA after receiving their **QA Visit Report**, they should follow the stages below. The stages must be followed in chronological order. The CAA-Registered Training Provider is responsible for initiating the appeals process at all 3 stages.

1.5.1 Stage 1

- An appeal must be made within 7 calendar days of receiving the **QA Visit Report** by emailing avsec.qa@avsec.caa.co.uk
- The Lead IQA (Responsible for Quality Assurance Framework) will acknowledge receipt of the appeal and arrange for a discussion between the CAA and CAA-Registered Training Provider to be undertaken.
- A discussion will take place within 7 calendar days of the request with the CAA-Registered Training Provider and the CAA.
- A note of the discussion will be maintained by the CAA.
- If the issue is not resolved, the training provider can move to Stage 2.

1.5.2 Stage 2

- The CAA Registered Training Provider must complete the '**Appeal against a CAA Decision**' form and submit via email within 7 calendar days of the informal discussions to: avsec.qa@avsec.caa.co.uk
- The IQA will review the documentation. If the IQA has already reviewed the documentation as part of the appeal, the appeal should move to Stage 3.
- The IQA completes the '**Appeal against a CAA Decision**' form and responds to the CAA-Registered Training Provider within 7 calendar days of the appeal.
- The CAA-Registered Training Provider acknowledges the recommended outcome and signs the form. If resolved, no further action is required. If unresolved move to Stage 3.

1.5.3 Stage 3

If a resolution has not been found after stage 2, the CAA-Registered Training Provider should highlight this on the '**Appeal against a CAA Decision**' form, sign and return to the IQA.

The IQA will forward this to the Quality Manager within 14 calendar days of notification of an appeal with additional information to include:

- all the relevant documentation relating to the appellant's application
- a note summarising the timeline of events, reason(s) for refusal and the factors behind the decision

Upon receipt of an appeal, the Quality Manager will consider the appeal within 28 calendar days of the '**Appeal against a CAA Decision**' form being received. The Quality Manager will;

- Write to the appellant to confirm that the appeal has been received and is being considered and that the original decision will remain in effect whilst an appeal is being considered.
- have had no involvement in the initial decision by the CAA
- have access to all the material available to the CAA when making their initial decision
- will operate as transparently as possible and consider the decision (including scrutinising information upon which any advice relied upon was based); and the decision making process

The Quality Manager may discuss the appeal with another Head of Department who has had no involvement in the initial decision. Any discussion with those who were involved in the decision-making process will be limited to facts about the case and the process that was applied at the time the decision was made.

The Quality Manager will make a decision based on the evidence provided. The appellant, EQA and IQA will be notified of the decision.

1. If the decision is upheld, the appellant will be provided with reasons as to why this is.
2. If the decision is overturned, the training provider will be reviewed and grading amended on the '**QA Visit Report**' form.

The decision made by the Quality Manager is final and no further appeals can be made by any party following their decision.

1.5.4 Appeals made directly to the DfT

Any appeals made directly to the DfT will be directed to the IQA at the CAA. The DfT will not enter in to any discussions with training providers in relation to an appeal relating to the Quality Assurance Framework.

2. Quality Assurance Policy

2.1 Scope and context

This document provides information on how the CAA will assure the quality of the quality assurance visits to CAA-Registered Training Providers. It should be read in conjunction with all other policies.

2.2 Our commitment

The CAA adopts best practice principles of quality assurance including:

- Quality assured quality assurance visit procedures and practices.
- Standard based and criterion referenced quality assurance.
- Monitoring and evaluation of quality assurance visits and EQAs.
- Appeal procedures for decisions made.
- Review and improvement mechanisms.

The CAA ensures:

- EQAs meet the Quality Assurance Framework requirements.
- Policies and practices support fair and consistent engagement with CAA-Registered Training Providers.
- EQA decisions are accurate and consistent across EQAs.
- EQAs are consistent in their interpretation and application of the Quality Assurance Framework.
- A confidential documentation audit trail is in place to enable tracking of all CAA-Registered Training Providers grading.
- EQAs have the required qualifications, skills and training to carry out quality assurance visits.
- Monitoring, reviewing, and evaluation of the Quality Assurance Framework, grading and EQA performance for continuous improvement occur.

2.3 QA visit planning

The CAA ensures that the Quality Assurance Framework will apply the following:

- Produce a coordinated external quality assurance plan that ensures full coverage of assurance framework requirements whilst avoiding over-assurance of elements through consultation with industry, educational professionals and QAWG.
- Provide CAA-Registered Training Providers with opportunities for self-assessment to identify areas of improvement through a transparent documentation process with examples of a good grading and access to the '**Quality Guidance Manual**'.
- Select quality assurance methods appropriate for the assurance elements and CAA-Registered Training Provider by identifying these in advance and ensuring all are aware of what these methods are on our website.
- Use language and expressions appropriate to the needs of a CAA-Registered Training Provider in all Quality Assurance Framework documentation.

- Ensure that EQAs are conversant with the content and standards that are required through a quality assured and role specific induction and annual standardisation meeting to include an annual standardisation activity.
- Have a planned approach to quality assurance, ensuring that all quality assurance documentation is quality assured before presentation to CAA-Registered Training Providers by using internal quality assurance practices, industry working groups and educational professionals.

2.4 Ethics

All CAA colleagues have completed training in the CAA ethics policy. As part of this policy colleagues have submitted a declaration stating any conflicts of interest. Any conflicts of interest declared by an EQA or IQA prevent that colleague from conducting a CAA-Registered Training Provider visit.

EQAs are allocated by the QAA taking into account the following criteria:

- Located no more than 100 miles from training provider location (face to face visits only)(Can be further with EQA consent);
- IQA availability;
- No conflict of interest;
- No known conflicts of personality/professionalism;
- Expertise;
- Known risk;
- IQA activities and IQA availability (If required for observation);
- Previous visits.

EQAs are only permitted to conduct a visit with the same CAA-Registered Training Provider on 3 subsequent occasions. The 4th visit must be conducted by a different EQA to ensure quality assurance and prevent bias or unfairness to other CAA-Registered Training Providers.

2.5 Recognition of previous performance

The CAA recognises previous performance through evidence, past **QA Visit Reports** (Phase PBO), and **Self-Assessment Reports**.

2.6 Making assurance decisions

The CAA ensures the following good practice principles apply:

- Sufficient authenticated evidence is reviewed upon which to make grading decisions.
- Quality assurance decisions are consistent / reliable across all EQAs.
- Decisions will be internally quality assured through desk-top reviews and a minimum of one observation per EQA per year. This may increase or decrease based on the performance of the EQA.
- Accurate and reliable records of a CAA-Registered Training Provider's performance are produced and maintained by the Quality Assurance

Administrator and anonymised details discussed at the Quality Assurance Working Group which meets twice annually.

- A system operates for CAA-Registered Training Providers wishing to appeal the outcome of a quality assurance visit through the **Appeals Policy**.
- A sampling assurance risk management strategy is implemented through CAA standardisation meetings which include:
 - Standardisation;
 - A process for monitoring, reviewing and evaluating the Quality Assurance Framework from both CAA-Registered Training Provider and CAA perspectives;
 - Accurate documentation showing a clear audit trail.

2.7 Providing feedback

The CAA ensures the following good practice principles apply:

- The Quality Assurance Framework is transparent and all relevant information is made available to CAA-Registered Training Providers prior to the quality assurance visit through the CAA website, industry briefing sessions and personal communication.
- Processes are in place to ensure clear results are given to CAA-Registered Training Providers within 7 calendar days of the quality assurance visit using forms available for CAA-Registered Training Providers to review at any time on our website. (The CAA reserves the right to take longer to provide results of a quality assurance visit and will notify a CAA-Registered Training Provider in these circumstances of a delay).
- Constructive, formative, and summative feedback as appropriate is given to CAA-Registered Training Providers with advice and feedback to assist development during a quality assurance visit by the EQA.
- Grading and feedback is kept confidential about the CAA-Registered Training Provider and only discussed in an anonymised way at the Quality Assurance Working Group.

2.8 Methods of Quality Assurance

The CAA conducts quality assurance at all stages of the Quality Assurance Framework through the following methods following the quality assurance strategy:

- Review of documentation;
- Interim observations of EQAs;
- Summative observations of EQAs;
- Training provider discussions;
- Portfolio reviews;
- Use of witnesses;
- Trend analysis;
- Complaints and appeals received;
- Feedback from the Quality Assurance Working Group.

A copy of the CAA's Internal Quality Assurance strategy for the Quality Assurance Framework is available on request.

2.9 Security

The CAA ensures that systems are in place for the secure recording, storing and accessing of CAA-Registered Training Provider s' **'QA Visit Reports'** and records through the CAA's GDPR requirements. Available on the CAA Website: [GDPR - Personal Data](#)

2.10 Provision of resources

The CAA ensures that appropriate physical, technological, financial and human resources are available to support fair quality assurance and to cater for the needs of CAA-Registered Training Providers.

2.11 Quality Assurance Working Group (QAWG)

The CAA is responsible to the Quality Assurance Working Group which is a sub group of the Training Steering Group (TSG) and meets bi annually. Members are CAA-Registered Training Providers invited by the CAA. The working group is chaired by the CAA. This forum discusses standardisation, queries policies, decisions and quality assurance as well as reviewing anonymous results and statistics to develop the Quality Assurance Framework.

The terms of reference of the QAWG have been agreed by the Training Steering Group in March 2019 and are detailed below:

The main purpose of the working group is to act as a consultative body for the CAA and DfT in the development of the Quality Assurance Framework for CAA-Registered Training Providers. .

The working group focuses on the quality assurance aspects of training, and forms a sub-group to the Training Steering Group (TSG).

The objectives for the working group are to:

- *Provide support, guidance and advice to the Department on the development of training policy with regards to the quality assurance of training.*
- *Aid in the development and review of the Quality Assurance Framework for CAA-Registered Training Providers to support the timely and effective implementation of the Quality Assurance Framework requirements of the National Aviation Security Programme (NASP).*
- *Identify and develop additional training material which supports the goals of the Quality Assurance Framework and relevant elements of the NASP.*
- *Review and evaluate anonymised statistical data from visits under the framework, in order to analyse any resulting trends.*
- *Ensure the TSG is given an update brief on the above matters at their biannual meetings.*

2.12 Amending the Quality Assurance Framework

Changes made to the Quality Assurance Framework will be communicated and discussed at the Quality Assurance Working Group and, at least 2 month notice of any changes communicated to all CAA-Registered Training Providers. .

All documentation will be reviewed annually in the first week of May.

2.13 Health and safety policy

The CAA ensures:

- All EQAs and CAA colleagues are trained in mandatory health and safety training as per CAA health and safety policies.
- All EQAs and CAA colleagues follow all health and safety policies and procedures as given by a CAA-Registered Training Provider during a quality assurance visit and take reasonable steps including Personal Protective Equipment (PPE) if necessary to look after their own health and safety and the safety of others.
- All electrical equipment is correctly tested and in good working condition.
- EQAs and CAA colleagues report any accidents or injuries to the named contact of the CAA-Registered Training Provider immediately along with contacting the nominated CAA Duty Contact for the visit.
- Risk assessments will be completed for face to face visits and where not feasible will be discussed with the CAA-Registered Training Provider.
- Where there is a risk to any party in undertaking a face to face visit, the CAA-Registered Training Provider will be asked to consider undertaking a remote visit.

2.14 Training provider responsibilities

In order to meet our policy requirements for fair quality assurance, CAA-Registered Training Providers also have responsibilities.

CAA-Registered Training Providers will:

- Follow the required procedures for fair and consistent assurance.
- Engage with the Quality Assurance Framework to ensure familiarity with requirements including authentication, deadlines, standards etc.
- Submit detailed and complete Self-Assessment Reports (SAR) in a timely manner at least 14 calendar days prior to a scheduled quality assurance visit including a self-assessment of grading expected to be achieved for each aspect of the Quality Assurance Framework.
- Provide health and safety information to all visitors as per own Health and Safety policy.
- Where known, make the CAA aware of any reasonable adjustments that can be made before, during, or after a visit to meet any additional needs of the CAA-Registered Training Provider.
- Appeal against a CAA decision using the appeals policy if required.

- Notify the CAA of any conflicts of interest in relation to the Quality Assurance Framework, EQAs and IQAs.
- Consider undertaking a remote visit in the interest of the health and safety of all parties.

2.15 Use of CAA branding under the Quality Assurance Framework

A CAA-Registered Training Provider is entitled to use the CAA branding issued after the registration period on marketing materials and correspondence for the purpose of promoting the CAA-Registered Training Provider's involvement in the Quality Assurance Framework. The use of this logo does not indicate accreditation, approval or suggest the quality of the CAA-Registered Training Provider and is used solely to identify that the CAA-Registered Training Provider has registered as part of the Quality Assurance Framework.

The CAA strictly controls the use of its logo. The text and image are trademarks and it is illegal to use them without permission. The logo may be used only by individuals or companies who:

- Hold an approval granted by the CAA.

An individual or company will only be permitted to use the CAA logo where the logo is also endorsed with the CAA issued registered training provider number, granted for that particular approval, permission or certification together with an explanation of the type of approval, permission or certification held.

There is no requirement to use the CAA branding provided and is at the discretion of the training provider. The branding must only be used as provided by the CAA at registration in its JPEG form and must not be altered, stretched or changed in any way. The CAA branding must always contain the registration number issued to the CAA-Registered Training Provider for identification purposes.

The CAA branding provided to a CAA-Registered Training Provider must not be shared with others or used on any other documentation except training materials, marketing and correspondence relating to training of NASP training syllabuses.

The CAA has the right to withdraw a CAA-Registered Training Provider's right to use the logo and the logo remains the property of the CAA at all times.

Anyone wishing to question the authenticity of the CAA-Registered Training Provider can check the CAA branding against the published Quality Assurance Framework – CAA-Registered Training Provider List on the CAA website or contact avsec.qa@avsec.caa.co.uk

If you believe a CAA-Registered Training Provider is incorrectly using CAA branding provided to them, you can follow the Complaint and whistleblowing procedures in this document.

3. Complaints and Whistleblowing Policy

3.1 Scope

This policy applies to CAA-Registered Training Providers registered to deliver aviation security training by the CAA. It should be read in conjunction with all other policies including:

- Malpractice Policy
- Appeals Policy

A complaint relates to any dissatisfaction with the provision of the Quality Assurance Framework that has been drawn to the attention of a member of the CAA including an EQA, but where the complainant is not satisfied with the outcome.

Whistleblowing relates to disclosures regarding any action that an individual considers to be illegal, unethical or not in line with company policies. In legal terms, whistleblowing relates to workers, however we will recognise disclosures from any CAA-Registered Training Provider, employee of a CAA-Registered Training Provider, members of staff or the public.

The CAA appeals policy addresses issues with CAA visit grading decisions and is not part of the scope of this policy.

The purpose of this policy is to demonstrate our commitment to ensuring any concerns and complaints are dealt with efficiently and that we operate to the highest standards of transparency and accountability.

3.2 Our commitment

The CAA aims to ensure a CAA-Registered Training Provider's satisfaction at all times. Anyone involved in any aspect of the delivery, quality assurance and outcomes has the right to complain if they are dissatisfied about any aspect of the service they receive.

3.3 Our procedures

The CAA ensures that CAA colleagues including EQAs are fully conversant with our policy and how to follow the procedures.

The CAA provides CAA-Registered Training Providers with details of how to appeal a CAA decision.

The CAA informally discusses any concerns with CAA-Registered Training Providers or other stakeholders with a view to resolving concerns before a formal complaint is made.

The CAA only addresses a formal complaint when informal discussions and actions do not resolve the issue or, if the stakeholder makes a request to do so.

The CAA follows the complaints and whistleblowing procedure to ensure timely and transparent decisions are made and so that any required actions can be carried out without adverse effect on the CAA-Registered Training Provider.

The CAA ensures that any complaints and disclosures are handled confidentially and only provide to others the information needed to carry out a full investigation and make a response.

The CAA ensures that any documentation related to the complaint is maintained confidentially. Full details will be held for three years after the resolution of the complaint. Anonymised details will be maintained after this time to contribute to our continuous improvement process.

The CAA ensures that any complaint or disclosure made in good faith will not disadvantage the complainant or lead to victimisation.

The CAA monitors complaints and disclosures received to review service and contribute to continuous improvement.

3.4 Supporting documentation

- Complaint form available from the [CAA website](#).

3.5 The complaint process

If a person wishes to complain, they should follow the stages below. The stages must be followed in chronological order. This process only applies after an informal discussion has taken place.

3.5.1 Stage 1

- The complaint / disclosure must be made to the Internal Quality Assurer (IQA) through the quality assurance inbox– avsec.qa@avsec.caa.co.uk. Complaints must be made using the **Complaint Form**.
- The Internal Quality Assurer (IQA) carries out an investigation, collating all relevant evidence
- The Internal Quality Assurer (IQA) completes the **Complaint Form** (for complaints, or sends an email for disclosures) and responds to the stakeholder within seven days of the complaint / disclosure.
- The stakeholder acknowledges the recommended outcome and signs the form (or responds by email in respect of disclosures). If resolved, no further action is required. If unresolved move to Stage 2.

3.5.2 Stage 2

- The complaint is now escalated to the Quality Manager who will review the investigation and make a decision. The Quality Manager decision is final.

3.6 Complaints/disclosures made directly to the DfT

Any complaints or disclosures made directly to the DfT will be directed to an IQA at the CAA. The DfT will not enter any discussions in relation to complaints / disclosures relating to the Quality Assurance Framework.

3.7 Whistleblowing

An individual can at any time use the confidential CAA whistleblowing procedure to make complaints or disclosures in a confidential manner. More information on CAA whistleblowing procedures is available on the CAA website: [Whistleblowing](#)

4 Data Protection Policy

4.1 Scope

This policy applies to the CAA Quality Assurance Framework. It should be read in conjunction with all other policies and in particular:

- Complaints and Whistleblowing Policy

This policy relates to the requirements under the General Data Protection Regulation (GDPR).

4.2 Our commitment

The CAA is committed to best practice in ensuring the protection of data in relation to our stakeholders (CAA colleagues, CAA-Registered Training Providers, and contractors). The CAA handles processes and protects personal data in line with the related legal and regulatory requirements. We will only share specific data relating to the Quality Assurance Framework with CAA Aviation Security colleagues (including SeMS and Lead Auditors), the DfT and the named contact of CAA-Registered Training Provider the data relates to.

4.3 Our procedures

The CAA ensures all of our CAA colleagues including EQAs are trained in their requirements under the relevant legislation and regulations following data protection procedures at all times.

The CAA uses personal data provided as part of the Quality Assurance Framework for a specified purpose and with permission of those it involves. The information is used to create an electronic record of CAA-Registered Training Providers, Certificated Instructors (CIN) and individuals / organisations recognised as being competent (RoC). It is also used to compile anonymised statistics. No statistical information produced by the CAA would allow industry to identify an individual CAA-Registered Training Provider unless the CAA-Registered Training Provider chose to disclose such information. Personal data will also be required to meet the CAA's regulatory requirements under relevant legislation and to provide the best service and support to training providers.

The CAA retains personal data for only as long as necessary and keeps it safe from unauthorised processing and accidental loss, damage or destruction. Personal data held by the CAA for the purposes of the Quality Assurance Framework is accurate, current and monitored on a regular basis with changes made in a timely manner.

The CAA allows stakeholders to access any personal data held on them as part of the Quality Assurance Framework, subject to a written request to the Quality

Manager. A request made by a stakeholder will be responded to within 20 working days, unless there is a valid reason for a delay. Any delays will be explained in writing.

Stakeholders are made aware of their responsibilities under the General Data Protection Regulation through this policy document.

Material containing personal or protectively marked information is kept securely. If the materials are no longer needed we dispose of them securely.

Personal information relating to the Quality Assurance Framework is managed internally by the Quality Assurance Administrator (QAA) using the process below. All data held in relation to the Quality Assurance Framework is only accessible to CAA Aviation Security and IT colleagues.

4.4 CAA-Registered Training Provider responsibilities

CAA-Registered Training Providers also have a responsibility under data protection policies and must ensure the following:

- A data protection policy is in place for the CAA-Registered Training Provider and followed.
- A CAA-Registered Training Provider ensures all details held by the CAA in relation to the Quality Assurance Framework are updated and notified to the CAA through the [***'Change of Details'***](#) form on the website as soon as any information provided at registration changes.
- A CAA-Registered Training Provider will not share details of other CAA-Registered Training Providers' information including potential commercially sensitive information without the permission of the CAA-Registered Training Provider. This includes the grading of any quality assurance visits.

4.5 Summary table of data protection procedures

Document	Duration Document Kept	Once Duration Expired
Appeals investigation	3 years from date of appeal	Appeal to be anonymised and held on file for identifying of trends, and data reporting.
Complaints/Disclosures	3 years from date of appeal	Appeal to be anonymised and held on file for identifying of trends, and data reporting.
Self-Assessment Report	For the duration a CAA-Registered Training Provider is registered with the CAA Quality Assurance Framework	Removed 3 months after the CAA-Registered Training Provider ceases to be registered with the CAA for the purpose of the QAF
QA Visit Report form	For the duration a CAA-Registered Training Provider is registered with the CAA Quality Assurance Framework	Removed 3 months after the CAA-Registered Training Provider ceases to be registered with the CAA for the purpose of the QAF
Visit Contact Details form	EQA/ CAA-Registered Training Provider - until 7 calendar days after the visit, QAA Until next visit is organised	EQA/ CAA-Registered Training Provider - until 7 days after the visit, QAA Until next visit is organised
Change of Details form	For the duration a CAA-Registered Training Provider is registered with the CAA Quality Assurance Framework	Removed 3 months after the CAA-Registered Training Provider ceases to be registered with the CAA for the purpose of the QAF
Registration documentation	For the duration a CAA-Registered Training Provider is registered with the CAA Quality Assurance Framework	Removed 3 months after the CAA-Registered Training Provider ceases to be registered with the CAA for the purpose of the QAF
Spreadsheets	For the duration a CAA-Registered Training Provider is registered with the CAA Quality Assurance Framework	Removed 3 months after the CAA-Registered Training Provider ceases to be registered with the CAA for the purpose of the QAF
EQA documentation (IQA reports etc.)	As per CAA employee handbook	As per CAA employee handbook

4.6 Withdrawal of consent or request for information

The Quality Assurance Framework conforms to the Civil Aviation Authority GDPR requirements which are published on the CAA website: [GDPR](#)

Information about the grading a CAA-Registered Training Provider achieves will not be communicated other than that to the contact name of the CAA-Registered Training Provider on the registration form. Any data used for statistics will be anonymised before use so as not to indicate the CAA-Registered Training Provider.

If a CAA-Registered Training Provider wishes to request their data be removed from the CAA database or request information about them that is held, they must contact foi.requests@caa.co.uk . Depending on the nature of the enquiry, such as withdrawal of consent, the CAA may still use personal information to comply with public function or legal duty.

Occasionally, the CAA may need to share personal information with other organisations, such as to investigate incidents with airlines or airports. Information may also need to be shared with the Department for Transport. In most cases this will be achieved by removing personal information. If the nature of the investigation means that the CAA need to share personal information, consent of the CAA-Registered Training Provider will be sought beforehand. A CAA-Registered Training Provider wishing to make it known that they do not wish the CAA to share their personal information, can email foi.requests@caa.co.uk.

Records of enquiries made to the CAA are retained for 3 years following a response or closure of a case or investigation, unless there are extenuating circumstances such as a legal or regulatory basis. Information is on occasion retained for research or statistical purposes ensuring that it is protected and only used for those purposes necessary.

4.7 Enquiries or complaints relating to GDPR:

An information enquiry or complaint about how the CAA has processed personal information can be completed by emailing foi.requests@caa.co.uk . Please be aware that the CAA is subject to the Freedom of Information Act, which means information supplied to the CAA may be released. However, the CAA would never disclose personal information without first obtaining the individual's consent.

5. Equality Policy

5.1 Scope

This policy applies to the CAA Quality Assurance Framework. It should be read in conjunction with all other policies including:

- Complaints and Whistleblowing Policy
- Quality Assurance Policy

The scope of this policy covers discrimination on the grounds of sex, gender, marital status, civil partnership, physical status or any disability, racial or ethnic origin, nationality, creed or religious belief, sexual orientation, age, pregnancy and maternity/paternity or employment status. It applies to CAA colleagues, CAA-Registered Training Providers and all other stakeholders.

This policy shows how the CAA complies with the Equality Act 2012.

This policy includes reference to reasonable adjustments and special consideration:

Reasonable adjustments refer to maximising the potential for all CAA-Registered Training Providers to participate in the Quality Assurance Framework by making interventions before and/or during a quality assurance visit.

Special consideration refers to actions taken after a quality assurance visit, as a result of unforeseen circumstances outside the control of the CAA Registered Training Provider, to ensure they achieve their potential outcome.

5.2 Our commitment

The CAA is committed to equality in all our engagements with stakeholders (colleagues, CAA-Registered Training Providers, contractors). The expectation is that all stakeholders promote equality and challenge any suggestion of discrimination ensuring everyone is included and that no person or group of people are disadvantaged.

The CAA treats everyone as individuals and provides all reasonable support to enable them to be successful.

5.3 Our procedures

CAA colleagues and EQAs are provided with the expertise needed to comply with this policy. This includes the ability to:

- identify discriminatory behaviour;
- identify those with support needs;
- support those with specific needs;
- manage reasonable adjustments and special considerations.

The CAA equality process for recruitment training and development can be found on the CAA website: [Equality and Diversity](#)

'We are committed to ensuring equality of opportunity in terms of recruitment, career progression and development. We regularly review policies, procedures and selection criteria to ensure that individuals are selected, promoted and otherwise treated fairly. We will not impose any requirement or condition without justification, and will make every effort to identify and remove unnecessary barriers and provide appropriate employment conditions to meet the needs of under-represented groups.'

CAA-Registered Training Providers are provided with details of how to raise issues related to equality. This includes:

- contact details of a designated post holder
- the timescales for any investigation to be undertaken
- the timescales for the outcome to be communicated
- the process to follow if the outcome is deemed to be unfair

This is covered through our Complaints policy. – See Complaints and Whistleblowing Policy section.

The CAA work with CAA-Registered Training Providers to determine any specific support needs they may have by:

- asking the CAA-Registered Training Provider to disclose in confidence to the QAA any reasonable adjustments required prior to a quality assurance visit;
- encouraging CAA colleagues to review stakeholder progress with a view to identifying specific needs.

Induction and review processes for CAA colleagues (including EQAs) include reference to this policy and anti-discriminatory practice.

The CAA is inclusive in the way it provides support and endeavours not to highlight to others any CAA-Registered Training Provider's support needs and to work with CAA-Registered Training Providers to remove, where practical, barriers to achievement.

The provision of resources needed to support CAA-Registered Training Providers is reviewed regularly to ensure appropriate physical resources are in place for those needed to support them.

The CAA maintains confidentiality of any CAA-Registered Training Provider's information related to additional support needs. Compliance with this policy is monitored by collecting data through CAA-Registered Training Provider applications for reasonable adjustment, feedback and outcomes.

The CAA asks all stakeholders to affirm their commitment to equality and diversity;

- For CAA-Registered Training Providers this is during their first quality assurance visit through documentary evidence CAA-Registered Training Providers produce to the EQA.
- For CAA colleagues (including EQAs), this is through the application process, when signing contracts of employment, induction and during performance review meetings.
- As part of internal quality assurance practices equality is monitored at all stages of the quality assurance framework. (See 2. Quality Assurance Policy).

Stakeholders are expected to treat people as they would like to be treated – fairly, equally, with courtesy and respect, challenging inappropriate behaviour, being open and honest in dealing with other people and organisations, protecting personal privacy and keeping commercial confidence.

6. Malpractice Policy

6.1 Scope

This policy applies to the CAA Quality Assurance Framework. It should be read in conjunction with all other policies including:

- Complaints and Whistleblowing Policy

6.2 Our commitment

Valid and reliable quality assurance occurs when CAA-Registered Training Providers present authentic and current evidence of their policies and procedures which are quality assured by an EQA against specified standards.

The purpose of this policy is to limit the threat to the integrity of those assurance decisions.

6.3 Our procedures

Stakeholders are informed what constitutes malpractice and the implications of malpractice. Procedures and documentation are regularly reviewed to minimise the risk of malpractice. Where malpractice is suspected, a formal procedure is followed.

6.4 Malpractice procedures

CAA-Registered Training Providers will be provided with examples of malpractice through this policy. CAA-Registered Training Providers will be expected to reference the use of appropriate sources in documentation used. The Lead IQA (Responsible for Quality Assurance Framework) and IQA will assess the risk of malpractice through the review of **QA Visit Reports**. A standard, time limited, sequenced and documented process for CAA colleagues and the CAA-Registered Training Providers will be followed where malpractice is suspected.

Where malpractice by a CAA-Registered Training Provider is suspected the following procedure will be applied:

6.4.1 Stage 1

- a) The CAA-Registered Training Provider will be notified of the issues and possible consequences. This will be added to the IQA Monitoring Report. The CAA-Registered Training Provider will have the opportunity to present a case to an IQA / the Lead IQA (Quality Assurance Framework)
- b) The Quality Manager will be notified of the issue(s). The IQA / the Lead IQA (Quality Assurance Framework) will:
 - I. scrutinising evidence;
 - II. discussing the issue with the EQA;
 - III. discussing the issue with the CAA-Registered Training Provider.

- c) The IQA / the Lead IQA (Quality Assurance Framework) makes a decision and informs both the CAA-Registered Training Provider and the EQA, and issues a sanction. Sanctions include:
 - a. A warning;
 - b. A 'Requires Improvement' grading issued to the CAA-Registered Training Provider;
 - c. A review of the CAA-Registered Training Provider's involvement in aviation security training and the Quality Assurance Framework.
 - d. De-registration from the Quality Assurance Framework programme.
- d) A record of the process, the evidence and the conclusion will be maintained and contribute to the programme review and evaluation.

6.4.2 Stage 2

Where the CAA-Registered Training Provider disagrees with the outcome of the investigation, they must notify the CAA who will discuss the case with the Quality Manager and make a final decision. The Quality Manager will then notify the CAA-Registered Training Provider of their decision. This decision is final.

6.5 Examples of malpractice by training providers

- Plagiarism of any nature, for example:
 - Taking extracts from work published or unpublished without using quotation marks and / or acknowledging the source;
 - Using ideas of another CAA-Registered Training Provider without acknowledgement;
 - Copying or using the work of another CAA-Registered Training Provider without their permission;
- Deliberate destruction of another's work;
- Fabrication of results or evidence;
- False declaration of authenticity in relation to the contents of documentary evidence;
- Impersonation by pretending to be someone else in order to produce the work for another or arranging for another to take one's place at a quality assurance visit;
- Linking a Certificated Instructor to a CAA-Registered Training Provider with no intention for the Certificated Instructor to undertake training for the CAA-Registered Training Provider or for the Certificated Instructor to work under the CAA-Registered Training Provider's quality assurance practices;
- Offering gifts in exchange for preferential treatment;
- Neglecting to follow company policies;
- Amending assessment results;
- Failure to keep assessment materials and restricted documents secure;
- Providing trainees with access to materials prior to the assessment;
- Colluding with trainees;
- Failure to complete records;

- Registering as a CAA-Registered Training Provider with no intention of delivering training during the registration year (May-April);
- Registering as a CAA-Registered Training Provider for no other purpose than the intent to gain access to materials published by the CAA for personal or commercial gain.

7. Communicating with the CAA

7.1 Scope

This policy applies to the CAA Quality Assurance Framework. It should be read in conjunction with all other policies.

7.2 Our commitment

We are committed to keeping in regular contact with CAA-Registered Training Providers to plan visits and ensure documentation is up to date and regularly reviewed. It is also an expectation of all CAA-Registered Training Providers to keep in contact with the CAA and meet the requests of the CAA. Where CAA-Registered Training Providers do not make contact with the CAA when requested the CAA will take steps to ensure that action is taken.

7.3 Our procedures

CAA-Registered Training Providers must make contact with the CAA when requested to provide information to the CAA for the purpose of the Quality Assurance Framework. The Quality Assurance Administrator (QAA) will make contact with CAA-Registered Training Providers at least 8 weeks prior to the feasible month indicated on the registration form and in future years at least 8 weeks prior to the deadline for visit completion.

The QAA will make two attempts to make contact with the named contact of the CAA-Registered Training Provider (submitted on the annual registration form) by telephone and email. It is then the responsibility of the CAA-Registered Training Provider contact to respond to the request from the QAA. If after 21 calendar days, no response is made, an additional attempt by telephone will be made to the CAA-Registered Training Provider contact. If no contact is successfully made with the CAA-Registered Training Provider, the IQA will be notified.

The IQA will:

- Send via email a letter to the CAA-Registered Training Provider outlining the CAA-Registered Training Provider requirements under the CAA-Registered Training Provider responsibilities set out in this policy document. They will request contact is made with the CAA.
- If the request is in relation to organising a quality assurance visit, the visit will be suspended / cancelled until contact is received from the CAA-Registered Training Provider and a new feasible month proposed by the CAA.
- If no response is received within 3 months of the date of the letter, the CAA-Registered Training Provider will be removed from the Quality Assurance Framework. No charges will be refunded by the CAA.
- Any Certificated Instructors (CIN) linked to the CAA-Registered Training Provider will be de-linked. If this causes a Certificated Instructor to not be linked to a CAA-Registered Training Provider, they will be suspended as a Certificated Instructor and contacted.

8. Safeguarding

8.1 Scope

This policy applies to the CAA Quality Assurance Framework. It should be read in conjunction with all other policies.

8.2 Our commitment

The safety and security of all persons involved in the Quality Assurance Framework is important to the CAA who will ensure steps are taken to ensure this at all times. At no point should any individual feel uncomfortable or unsafe during a quality assurance visit. A quality assurance visit conducted face-to face will **not be permitted** to take place at a residential address. This includes residential addresses where home offices are located.

8.3 Our procedures

CAA colleagues, CAA-Registered Training Providers and other stakeholders will not be permitted to conduct activities for, and on behalf of the CAA at residential addresses to ensure the safety and security of all parties. A CAA-Registered Training Provider who registers at a residential address will be required to make alternative arrangements at their own costs to accommodate a quality assurance visit. This venue can be any suitable location within a public or private business environment including training venues. The CAA regional offices can also be used for this purpose or the CAA-Registered Training Provider may consider undertaking a remote visit in such circumstances.. The CAA will endeavour to assist the CAA-Registered Training Provider in finding suitable venues for the visit to take place. The CAA will contact the CAA-Registered Training Provider 8 weeks prior to a visit to assist in finding suitable accommodation or support with a decision to undertake a remote visit.

The External Quality Assurer (EQA) has the right to terminate a quality assurance visit if they feel the venue puts them or others at risk and no refund will be provided in lieu of visit charge to the CAA-Registered Training Provider.

The EQA will provide identification at the start of a visit to prove their identity and will ask the same of those involved in the quality assurance visit.

8.4 Procedures

If at any time, any party feels at risk during the quality assurance visit they can terminate the visit and contact the CAA to report an incident of safeguarding. The CAA will follow all reports relating to safeguarding through the **complaints policy** outlined in this document.

9. Statutory Charges

9.1 Scope

This policy applies to the CAA Quality Assurance Framework. It should be read in conjunction with all other policies.

9.2 Our commitment

Details of all charges, review dates and processes relating to the Quality Assurance Framework are available online:

<https://www.caa.co.uk/Our-Work/About-us/Doing-business-with-the-CAAMaking-a-payment/>

The terms and conditions are outlined on page 1 of the web-form and must be accepted prior to payment of any statutory charge.

A stakeholder may request a refund by contacting avsec.qa@avsec.caa.co.uk for incorrect or duplication of a web-form and payment submitted. A refund will not be given if a CAA-Registered Training Provider chooses to cancel their registration part way through a Quality Assurance Framework year. In addition, if a registration is cancelled due to malpractice a refund will not be provided.

If a CAA-Registered Training Provider chooses to cancel a quality assurance visit with more than 14 calendar day notice a full refund of the visit charge will be provided. This request must be made in writing to avsec.qa@avsec.caa.co.uk. If less than 14 calendar day notice is provided, a refund will not be issued and an additional visit charge will be required to re-schedule the visit.

There is no charge in year 1 for a desktop review after a quality assurance visit for a CAA-Registered Training Provider who is graded 'requires improvement'. In subsequent years a CAA-Registered Training Provider will be required to pay for additional visits based on the overall grade awarded by the CAA.

The CAA reserves the right to amend charges at any time. Charges are reviewed by the CAA annually in November for implementation the following April. At least 2 month notice will be provided to all stakeholders of implemented changes to charges.

10. Amending Quality Assurance Visit Dates

10.1 Scope

This policy applies to the CAA Quality Assurance Framework. It should be read in conjunction with all other policies.

10.2 Our commitment

The CAA are committed to ensuring that visits planned take place when agreed, and where possible will give a CAA-Registered Training Provider at least 14 calendar day notice if a visit cannot take place. In extreme circumstances we may have to cancel a visit on the day due to staff sickness and will ensure the CAA-Registered Training Provider is updated at all times.

10.3 CAA-Registered Training Provider commitments

The CAA understands there may be times for operational or personal reasons a CAA-Registered Training Provider may choose to postpone or cancel a planned quality assurance visit. A CAA-Registered Training Provider may make a maximum of 3 changes to a quality assurance visit date within each Quality Assurance Framework year (May-April). This includes any changes to a feasible visit month, confirmed visit date, or cancelling a visit. The CAA-Registered Training Provider must contact the CAA by email as soon as it is realised a visit cannot take place. CAA-Registered Training Providers should account for operational needs of their business, workloads and amount of work and time required to meet the deadline when proposing feasible dates to the CAA to avoid the need to change the date / feasible month of a visit where possible.

10.4 Procedure

There will be no charge for changing a visit unless a visit is cancelled within 14 calendar days of a confirmed visit. Any visit changed must be completed by the deadline for the phase the CAA-Registered Training Provider belongs to or within 12 months of a previous quality assurance visit.

The Quality Assurance Administrator (QAA) will record any changes made to visit dates or feasible visit months and liaise with the CAA-Registered Training Provider to find an agreeable date for both the CAA-Registered Training Provider and EQA if a change of visit date / feasible month is requested. The QAA reserves the right to refuse a proposed date or month. If 3 changes to a visit date and / or feasible month are made, a request for a further change will be denied.

If a CAA-Registered Training Provider cancels a scheduled quality assurance visit with less than 14 calendar day notice, the CAA will cancel the visit and acknowledge this by letter. The visit charge will not be refunded and the CAA will provide a revised month for the quality assurance visit to be rescheduled. This will be at least 8 weeks in advance. No refunds will be provided and an additional visit charge will be required for the re-scheduled visit.

11. Remote visits

11.1 Scope

The CAA is keen to ensure that quality assurance visits where practically possible can be continued during time of operational disruption to ensure the best outcome for all involved in a visit and to meet the deadlines of the Quality Assurance Framework.

11.2 Our commitment

Where suitable technology can be accessed by all parties concerned, and agreement with all parties has been sought, the use of remote visits is permitted. The CAA will ensure that a CAA-Registered Training Provider is not put at an unfair advantage/disadvantage, or is unable to demonstrate how they meet the Quality Assurance Framework if a remote visit is undertaken.

11.3 Definition

'A 'remote meeting' undertaken via digital technology.

11.4 Use of technology:

The EQA will use telephone, email and suitable web based video software to communicate with the CAA-Registered Training Provider and receive/share evidence. The EQA may also use 'WhatsApp' for video conferencing. The CAA will provide additional guidance to all parties regarding the suitability of preferred web based video software.

11.5 Procedure

The following must be agreed prior to approval for a remote visit:

- The CAA-Registered Training Provider has agreed with the CAA that a remote visit is acceptable and:
 - They have the ability to email documentation to the EQA in advance of the remote visit;
 - They understand data protection requirements of sending data electronically;
 - They do not feel that they will be disadvantaged by undertaking a remote visit.

11.5.1 Prior to the visit the EQA will:

- Contact the CAA-Registered Training Provider to discuss the remote visit and answer any questions;
- Ensure they have access to an email account/web based software and contact the CAA-Registered Training Provider through this account;
- Conduct a test with the CAA-Registered Training Provider to ensure that email/web based video software will be suitable to undertake the remote visit;
- Confirm to the CAA Duty Contact that the test has been successful.

11.5.2 Prior to the visit the CAA-Registered Training Provider will:

- Organise all documentation into a 'ZIP' file with clearly labelled document titles to assist the EQA (where possible this should be separated into each of the 6 aspects);

- Conduct a test with the EQA to ensure that email/web based video software will allow both the EQA and the CAA-Registered Training Provider to send and receive documents;
- Send all evidence to the EQA in advance of the remote visit via email.

11.5.3 On the day:

- The EQA will contact the CAA-Registered Training Provider at the agreed time to commence the remote visit.

11.5.4 Data Protection

- Please refer to the Quality Assurance Framework Policies Document.
- A CAA-Registered Training Provider should also follow their own internal data protection policies and procedures as required.
- All documentation received from the CAA-Registered Training Provider by the EQA will be deleted within a week of the visit.
- Trainee data can be sent via email/shared by web based video software as it should not contain details of personal emails, dates of birth, security clearances, addresses or contact details. It is acceptable for trainee names to be sent as part of training records to the EQA.
- If there are concerns over data protection please contact the CAA Duty Contact before opening or sending documents where there is a concern.

11.6 Failure of Technology

If at any point technology fails, the EQA should cancel the visit and contact the CAA Duty Contact. The CAA will then organise for the visit to continue at a later date.

11.7 Quality Assurance

The CAA will conduct planned interim and summative observation activities where remote visits are undertaken. The CAA will contact all parties in advance and may join either a conference call or web based video software during a remote visit. They may also request for documents to be emailed/shared through web based video software to conduct quality assurance activities. In addition, the CAA will increase the number of telephone discussions post visit with CAA-Registered Training Providers to ensure that remote visits are reliable and that a CAA-Registered Training Provider does not feel penalised or disadvantaged by undertaking a remote visit.

12. Contacting the CAA

The CAA can be contacted by email and phone. We aim to respond in 5 calendar days of an initial query.

Email: avsec.qa@avsec.caa.co.uk

We kindly ask that you do not contact individual members of the team to ensure your query can be answered quickly.