Audit guidance for the Transition to EASA Subpart FTL

Version 1

(Elements under performance based requirements managed under the operators SMS. This does not cover FRM applications.)

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1. ORO.FTL.110 Operator Responsibilities / ORO.GEN.200 Management System			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
1.1	Crew member fatigue is indicated as a potential hazard on the organisations hazard log and the risk register identifies specific operational aspects where fatigue could generate an increased risk. (ORO.GEN.200)		
1.2	The Operator's Fatigue management processes are managed as part of the operators SMS processes. (ORO.GEN.200)		BP
1.3	There is a method by which crew can report fatigue (ASR / specific Fatigue reporting form) (ORO.GEN.200(a)(3)).		
1.4	The Operator has demonstrated, within their operation / operations, how fatigue risks are: ▪ identified and assessed ▪ monitored ▪ controlled (ORO.GEN.200 / ORO.FTL.110 (b)(d)(e)(g))		
1.5	The consideration of fatigue risk is undertaken at the earliest opportunity in the flight planning / network scheduling process. As a minimum this would be on a seasonal (summer/winter) basis. (AMC1 ORO.FTL110)		BP

2. ORO.FTL.110 (a) Operator Responsibilities "Duty rosters are published sufficiently in advance to provide the opportunity for crew members to obtain adequate rest"			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
2.1	Rosters are published at least 14 days in advance**.** (AMC1 ORO.FTL.110(a))		

3. ORO.FTL.110 (b) Operator Responsibilities – **"The Operator ensures that flight duty periods are planned in a way that enables crew members to remain sufficiently free from fatigue so that they can operate to a satisfactory level of safety under all circumstances."**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
3.1	The Operator has developed their own Fatigue Management rostering rules to manage the risks associated with their type of operation(s), specifically in relation to the requirements of (b) (AMC1 ORO.FTL.110)		
3.2	The Operator has a procedure for managing the possibility that crew working overtime or on rostered days off, might encounter elevated levels of fatigue during the duty. (ORO.FTL.110 (b)(d))		
3.3	The Operator can demonstrate that the FDP's are developed to take into account sufficient time for pre-flight duties, taxiing, flight time and turnaround times. (AMC1 ORO.FTL110 (b))		

4. ORO.FTL.110 (c) Operator Responsibilities **"Specify reporting times that allow sufficient time for ground duties**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
4.1	Specified reporting times demonstrate that they allow sufficient time for ground duties.		
4.2	The reporting times specified by the Operator take account of the type of operation, the size and type of the aircraft and the reporting airport conditions. (GM1 ORO.FTL.205(a)(1))		

5. ORO.FTL.110 (d) Operator Responsibilities **"Take into account the relationship between the frequency and pattern of FDP's and rest periods and give consideration to the cumulative effects of undertaking long duty hours combined with minimum rest periods"**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
5.1	The Operator considers the cumulative effects of undertaking long duty hours combined with minimum rest periods		
5.2	Procedures are in place to consider the relationship between the frequency and pattern of flight duty periods and rest periods when rosters are constructed. (AMC1 ORO.FTL.110)		
5.3	The operator can demonstrate that they distribute the work evenly. (AMC1 ORO.FTL.110 (a))		
5.4	The Operator has developed their own fatigue management rostering rules to manage the risks associated with their type of operation(s), (specifically in relation to the requirements of (d). (AMC1 ORO.FTL.110)		

6. ORO.FTL.110 (e) Operator Responsibilities **"Allocate duty patterns which avoid practices that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties"**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
6.1	The Operator has processes in place to monitor and manage the fatigue associated with transitions from 'earlies' to 'lates', and vice versa		
6.2	The Operator has a process to assess and, where possible avoid or minimise the impact of work patterns which contain undesirable practices (alternating day/night, alternating eastward/westward – westward/eastward transitions, long positioning duties). (AMC1 ORO.FTL.110 (b)(1)). *(Note: This AMC reference also applies to the requirements under (d) and (g).)*		

7. ORO.FTL.110 (f) Operator Responsibilities **"Comply with the provisions concerning disruptive schedules in accordance with ARO.OPS.230"**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
7.1	Rostering system rules can demonstrate that they comply with the Disruptive Schedules requirements. (CS FTL.1.235(a))		

8. ORO.FTL.110 (g) Operator Responsibilities **"Provide rest periods of sufficient time to enable crew members to overcome the effects of the previous duties and to be rested by the start of the following flight duty period"**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
8.1	The Operator can demonstrate that they have considered not only the length of the rest period but it's placement during the day (24 hour periods) such that the crew members can be suitably rested to operate.		
8.2	The Operator can demonstrate that they roster sufficient rest periods to recover from long flights crossing time-zones. (AMC1 ORO.FTL.110 (b)(2))		
8.3	Where crew are called off standby, or additional overtime is offered to crew members on days off, the Operator has a procedure to ensure that consideration is given to the impact of this extra duty on the subsequent duties already rostered.		

9. ORO.FTL.110 (h) Operator Responsibilities **"Plan recurrent extended recovery rest periods and notify crew members sufficiently in advance"**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
9.1	Recurrent extended recovery rest periods are planned and crew members notified sufficiently in advance.		
9.2	Roster stability/disruption metrics have been established to demonstrate the level of disruption to which rosters are subjected after the planned roster has been issued		
9.3	Where crew are called from standby or reserve, or additional overtime is offered to crew members on days off, the Operator has a procedure to ensure that the crew member being called is sufficiently rested for the duty.		

10. ORO.FTL.110 (i) Operator Responsibilities **"Plan flight duties in order to be completed within the allowable flight duty period taking into account the time necessary for pre-flight duties, the sector and turnaround times"**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
10.1	Flight duties are planned in order that they are completed within the allowable flight duty period, taking into account the time necessary for pre-flight duties, the sector and turnaround times (ORO.FTL.110(i)).		

11. ORO.FTL.110 (j) Operator Responsibilities **"Change a schedule and/or crew arrangements if the actual operation exceeds the maximum flight duty period on more than 33% of the flight duties in that schedule during a scheduled seasonal period"**			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
11.1	The Operator has a process for ensuring that schedules and/or crew arrangements are changed if the actual operation exceeds the maximum flight duty period on more than 33% of the flight duties in that schedule during a scheduled seasonal period.		
11.2	The operator has established and monitors performance indicators for operational robustness of rosters. (AMC1 ORO.FTL.110(j) / GM1 ORO.FTL.110(j))		

12. Demonstration of Compliance. Fatigue metrics and methods are in place that demonstrates that the requirements of ORO.FTL.110 and AMC1 ORO.FTL.110 are being met. (ORO.GEN.200 (a)(6))			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
12.1	The Operator's crewing system is able undertake all of the ORO.FTL.110 Operator Responsibilities (a-j).		
12.2	The Operator's crewing system is capable of monitoring compliance with regulatory prescriptive numerical limits and the requirements under ORO.FTL.110.		
12.3	Appropriate fatigue metrics have been selected and are monitored.		
12.4	Roster stability/disruption metrics have been established to demonstrate the level of disruption to which rosters are subjected after the planned roster has been issued. (ORO.FTL.110 (b)(d)(e)(g)(j))		
12.5	There is evidence that fatigue metrics are used to inform fatigue management decisions made by the Operator. For example, how to schedule a charter flight or new route.		
12.6	There is a systematic process for evaluating the effectiveness of the Operator's fatigue management procedures required to demonstrate ORO.FTL.110 under the Operator's SMS. (ORO.GEN.200)		
12.7	Fatigue risk mitigations and controls are being verified / audited to confirm their effectiveness. (ORO.GEN.200)		

13. ORO.FTL.115 Crew Responsibilities			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
13.1	The Operator has a method for advising the crew members of their responsibilities under ORO.FTL.115.		

14. ORO.FTL.200 Home Base			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
14.1	The Operator maintains a record of the home base to which the crew are assigned. (ORO.FTL.245(a)(1)(iv))		

15. ORO.FTL.205 Flight Duty Period (FDP)			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
15.1	The Operator has established procedures which specify how a commander can reduce an FDP or increase a rest period (ORO.FTL.205 (a)2).		
15.2	The Operator has a process to ensure that all discretion is reported by the Commander. (ORO.FTL.205(f)(4))		
15.3	The Operator has developed a non-punitive process for the use of Commanders Discretion and described this process in the operations manual (ORO.FTL.205(f)(6)).		
15.4	The Operators process for commanders discretion complies with the requirements of AMC1 ORO.FTL.205(f).		
15.5	The Operator has established procedures in the operations manual for delayed reporting (ORO.FTL.205(g)) in accordance with CS FTL.1.205(d).		
15.6	The Operator maintains records of delayed reporting (CS FTL.1.205(d)(1)).		
15.7	Detailed delayed reporting procedures have been established in the operations manual for the notification and management of delayed reporting. (including method of notification at home base or away from base, notification times, avoidance of disturbing sleep. GM CS FTL.1.205(d)) CS FTL.1.205(d).		
15.8	Specific fatigue risk processes are in place to manage duties of more than 10 hours that encroach or encompass the night period (0200-0459), in relation to the surrounding duties and rest period. (CS FTL.1.205) in accordance with GM1 CS FTL.1.205(a)(2)		

16. ORO.FTL.210 (c) Flight Times and Duty Periods (post flight duty periods)			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
16.1	The Operator has specified the minimum time for post flight duties.		
16.2	When specifying the minimum time for post flight duties the Operator is able to demonstrate that they have considered the type of operation, the size and type of the aircraft and the airport conditions. (AMC1 ORO.FTL.210 (c))		

17. ORO.FTL.220 Split Duty			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
17.1	The Operator has specified the times for post and pre-flight duties and travelling time within the operations manual. (CS FTL.1.220 (b))		
17.2	The times specified by the Operator take into consideration the aircraft type, type of operation and airport conditions. (GM1 CS FTL.1.220(b))		

18. ORO.FTL.225 Standby and Duties at the Airport			
Reference	**Marker**	**How is it achieved?**	**Remarks**
18.1	The Operator has specified the maximum duration of any standby within their FTS scheme. (ORO.FTL.225 (f)(1))		
18.2	The Operator can demonstrate that the response time provided from a call out from standby (other than at the airport) allows the crew member to arrive from their place of rest to the reporting time with a reasonable time. (CS FTL.1.225(b)(10) & GM1 CS FTL.1225(b))		
18.3	The Operator has a procedure to avoid ensure that a call out from standby (other than airport standby) combined with the allocated FDP does not create an “awake” time of greater than 18 hours. (GM1 CS FTL.1.225(b)(2))		
18.4	Where the Operator has elected to move to 25% accountability for other than at the airport standby duties, they have a method to track (and a have process to conduct regular assurance of) the Civil Aviation (Working Time) Regulations annual working time standby hours requirements. (Under the CAA’s oversight requirements of the CA(WT)R SI 2004 No.756 Regulation 9 (amended under SI 2010 No.1226)		

19. ORO.FTL.230 Reserve			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
19.1	The Flight Time Specification Scheme specifies the maximum duration of any single reserve period and the number of reserve periods that can be consecutively assigned.		
19.2	The Operator's reserve process includes a period of 8 hours where the crew member cannot be contacted. (CS FTL.1.230 (d))		
19.3	The Operator's procedures include a notification process that avoids interference with normal sleeping patterns, where possible. (GM1 CS FTL.1.230)		

20. ORO.FTL.235 (b) Rest Periods			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
20.1	The Operator can demonstrate when the crew member is away from base that the location of the chosen suitable accommodation allows for an 8 hour sleep opportunity in addition to the time needed for travelling and physiological needs.		

21. CS FTL.1.235 Rest Periods (b)(2) & (5)			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
21.1	The Operator can demonstrate there is a process for monitoring the effects of rotations and combinations of rotations on crew member's fatigue level, including how they will adapt the patterns of work if necessary. (CS FTL 1.235 (b)(2)).		
21.2	The Operator can demonstrate that the monitoring of the combinations of rotations is being conducted under their management system. (CS FTL.1.235(b)(5))		
21.3	The Operator ensures the requirements of the CA(WT)R are adhered to with relation to days off. (Under the CAA's oversight requirements of the CA(WT)R SI 2004 No.756 Regulation 10.)		

22. ORO.FTL.240 - Nutrition			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
22.1	The Operator can demonstrate there is a meal and drink opportunity, especially where the FDP exceeds 6 hours.		
22.2	The Operator has specified in accordance with AMC1 ORO.FTL.240 how the crew member nutrition is ensured. (Minimum duration, time frames)		

23. ORO.FTL.250 – Fatigue Management Training			
Ref:	**Marker**	**How is it achieved?**	**Remarks**
23.1	All crew members have completed a Fatigue Management education and awareness training programme which conforms to the training syllabus for fatigue management training specified in AMC1 ORO.FTL.250.		
23.2	The Operator has trained its crew on their specific fatigue risks and the operator's processes for reporting fatigue. (AMC1 ORO.GEN.200(a)(4))		
23.3	"Management personnel concerned" (ORO.FTL.250) directly or indirectly with crew scheduling have received appropriate fatigue awareness and countermeasures training.		
23.4	Personnel responsible for the preparation and maintenance of rosters (crewing and rostering staff) have received appropriate fatigue awareness and countermeasures training.		
23.5	The Operator has identified how often recurrent training will take place. (ORO.FTL.250(a))		
23.6	The initial and recurrent training syllabus is suitable for the organisation's operations and is adapted for the required groups. (ORO.FTL.250(a))		
23.7	Training records are kept up to date (AMC1 ORO.GEN.200(a)(4) &(6))		
23.8	*The effectiveness of the training is continuously measured, for example via feedback forms at the end of the training.*		Best Practice