



RECREATIONAL  
AVIATION AUSTRALIA

## CHAPTER EIGHT

# Administrative Requirements

The Flight Instructor Reference Manual, for very good reasons, has focussed on the key ground and airborne teaching elements for Instructors. Of equal importance to these tasks, for different reasons, is the range of administrative requirements. These include student training records and documentation, Instructor administration and compliance and interactions with RAAus administration to recommend applications and approvals.





The RAAus Operations Manual provides specific information on requirements for issue and renewals, currency and the limitations of ratings and approvals so this chapter focuses on the administrative requirements of an Instructor. We will discuss strategies and requirements for ensuring governance, compliance and documentation are managed as part of the instructional role whether for basic flight training delivery, oversight or school management.

### General requirements

**Student Records.** At the completion of the lesson, part of the debriefing process should not only include the outcomes of the lesson, but writing notes in the students' progress record. It is apparent this component of the Instructors responsibilities is delayed, forgotten or hastily added with little thought to the importance of the written record.

This not only impacts the student record, but can have consequences for the next Instructor or the next lesson. While many RAAus schools operate in a single Instructor environment making accurate record keeping seem a little superfluous, a well-written summary and notes form important building blocks in effectively managing student's progress. The RAAus Generic Student Progress (GSP) record provides an effective and comprehensive format to complete these requirements. Reference to the RAAus competency coding makes it simple for the Instructor to easily determine if the competencies were met for the syllabus elements trained during the lesson.

Likewise, the detail provided in the comments section can greatly assist the next Instructor when to conducting the next lesson. "Student did not manage rudder inputs with power applications" is a clear comment indicating the student was not on top of rudder inputs, whereas "Student failed to use rudder properly, needs work" does not.

Once the student has been made aware of this deficiency and is now correctly managing rudder inputs "Student is now correctly correcting power changes with rudder", is clearer than "Student has now fixed this problem" or worse still, not noting the correction has been made.

Managed successfully, the writing of notes in the student record can be conducted as part of the debrief process with the student, by involving them in the process and ensuring the student agrees with the Instructor outcomes. Samples of the use of the GSP have been provided in Appendix 5 of this manual.



### The debrief

This process must be adapted by the Instructor to be relevant to the elements covered in the lesson and the progress of the exercise. There should be a clear understanding and agreement between Instructor and student regarding attainment of outcomes and standards. Often the student is excessively harsh in their own assessment or they may focus on areas that you as the Instructor know is superficial and will come with time and experience. The balanced debrief will ensure that key lesson elements are discussed and agreed on, and remedial actions or relearning agreed on as action plan. Linking the successful preceding lesson with the next is an effective method of “signposting” for the student that will allow them to associate the previous and future lessons. It will also assist to underpin the importance of basic flight skills as experience and skills are built.

A student may ask “Was I good enough?” or “how did I go?” The Instructor may be tempted to assure the student that they will know when they are good enough or that the Instructor “will let you know” but this does nothing to provide assurance or specific guidance to the student. This is where the competencies referenced in the RAAus briefing sets can be used during debriefings, to assist the student become more effective at self-assessment at a practical standard as they develop in their flight training.

### Understanding basic student training requirements

The RAAus training landscape is far more complex and varied than the past 30 years but the basic requirements are unchanged. Current membership, health standards, English Language Proficiency and an understanding of the risks are all outlined within the Operations Manual and must be fully understood by all Instructors.

Membership requirements, assessing students, declarations of medical status and a thorough understanding of the RAAus Syllabus of Flight Training for practical and theoretical requirements are some of the key areas that Instructors should be fully conversant with prior to the commencement of any instructional duties.

### Risks of flying

The Instructor must also provide clear information to the prospective student about the risks of flight training. The RAAus Operations Manual provides a clear outline of the specific risks:

*“Persons undertaking flying training and other types of flying in recreational aircraft are advised that there are risks involved. These risks cannot be specifically quantified, however; recreational aircraft used for pilot training are constructed, operated and maintained under exemptions from the regulations.”*



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*These exemptions are from the regulations that apply to General Aviation aircraft. Whilst similar rule sets apply to our organisations and replace those that we are exempt from, it must be accepted that the overall safety of recreational flying is generally below the well-known commercial air transport standards in Australia.”*

In 2013, the NSW Supreme Court determined in two separate cases that a student learning to fly a light aircraft is engaging in a dangerous activity (Campbell v Hay (2013) NSWDC 11) and (Echin v Southern Tablelands Gliding Club (2013) NSWSC 516). In NSW, pursuant to the Civil Liability Act (NSW) 2002 (the Act), a person injured whilst participating in a dangerous recreational activity and as a result of the injury arising from a risk that is an obvious risk is barred from recovering damages from another person, notwithstanding that other person may have been negligent.

It is recommended that for the initial flight the Instructor point out the mandatory placards in the aircraft and advise that the aircraft does not comply to general airworthiness standards, but is compliant to alternative standards for Type Certified or Light Sport Aircraft (LSA). Instructors must make sure the student understands this specific risk.

The Instructor must be also be clear about providing information relevant to RAAus flight privileges and the structure of regulations ranging from the Civil Aviation Act 1988, the Civil Aviation Regulations (CAR) and Civil Aviation Safety Regulations (CASR) and the unique Civil Aviation Orders relevant to RAAus. This includes information relating to the limitations and options available by starting flight training within the RAAus framework. Additional considerations include an understanding of the requirements for working with young student and requirements for converting local and overseas pilots. Useful checklists and resource material has been provided as Appendices to this manual and via the RAAus CFI Portal. The Operations Manual remains the ultimate reference document.

### Requirements for CFIs

This section will provide information on: Responsibilities for renewals and proficiency checks for I/SI, use of aircraft daily flight logs and maintenance confirmation, understanding guidance material RAAPs regarding supervision, temporary approvals (in the absence of the CFI), satellite operations, medical maintenance and administration, potential conflict of interest issues, the RAAus Technical Manual and CFI Procedures Manual, oversight of accurate student record completion, use of reminder system to manage Instructor and aircraft compliance requirements.

CFI Approvals are issued to a Senior Instructor rating holder to acknowledge their responsibility for a RAAus Flight Training School. The CFI Approval is issued by Operations based on the applicant holding a current RAAus Senior Instructor rating.



The CFI Procedures Manual <https://cfiportal.raa.asn.au/resources> is the reference document that all CFIs should be familiar with and refer to when conducting school operations. This document is accessed via the RAAus CFI Portal <https://cfiportal.raa.asn.au/home> along with other valuable resources to assist the CFI to effectively deliver compliant, consistent training within the RAAus flight school framework. The CFI is responsible for conducting proficiency checks for Instructors unless otherwise authorised by RAAus Operations.

The CFI must ensure an easily referenced document system is available and used to record all flight training activity at the school. Additionally, students and Instructors must be able to readily determine the time before scheduled maintenance and a means to record any identified defects or 'gripes'. This may be completed via individual aircraft daily log sheet and maintenance record, or a combined school flight training log. Important information which must be captured in this documentation includes a means to determine the airworthiness of the aircraft (other than simply having the CFI or Instructor provide verbal assurance), the total time for the lesson, fuel aboard at departure, landings during the exercise, and name's of pilots, students and Instructors. The RAAus Maintenance Record <https://members.raa.asn.au/storage/maintenance-form.pdf> is a useful document which meets these requirements.

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It is important CFIs develop an effective means to manage required all compliance requirements for Instructors, via an electronic calendar or use of a white board system. While the Instructor is expected to be responsible for their own renewal requirements, the CFI has an overarching responsibility to RAAus to ensure these requirements are current. These requirements include Instructor validity, ongoing and periodical medical compliance requirements and normal flight currency requirements. Further guidance material can be found in RAAP 3 Instructor Supervision <https://members.raa.asn.au/documents-and-forms/raaps/> on Instructor supervision.



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The CFI therefore has a multi-faceted management role over and above the flight training requirements that includes administrative and technical duties they are solely responsible for, even if these responsibilities are delegated within the school operations. An example of this is where maintenance of flight school aircraft is performed by an independent L2 Maintenance Approval holder. The CFI is still responsible for ensuring the aircraft is airworthy and that all mandatory maintenance requirements practices have been completed. These include compliance with both manufacturer and RAAus Technical Manual <https://members.raa.asn.au/documents-and-forms/technical-manual-version-4/>.

CFIs who also hold L2 Maintenance Approvals and conduct maintenance on aircraft used in schools are committing to additional workload and potential conflict of interest concerns that must be carefully managed. The CFI/L2 Approval holder must be particularly aware of the potential conflict of interest inherent when conducting maintenance on aircraft used for flight training. RAAus encourages these functions to be separated or independently oversighted where possible.

Where flight training is conducted at Satellite Flight Training Schools all training, administrative and compliance requirements are still the direct responsibility of the CFI. Requirements including regular visits by the CFI and oversight of documentation is critical.

Senior Instructors seeking to gain temporary approvals as a CFI during periods of absence by the CFI and by arrangement with Operations should reference the RAAus Operations Manual to ensure minimum requirements are met in order to be eligible to hold a CFI Approval and be fully conversant with the RAAus CFI Procedures Manual <https://cfiportal.raa.asn.au/resources> A temporary Approval represents an ideal opportunity for CFIs to mentor and develop suitable SI to understand the role of the CFI as required. CFIs should also consider appropriate succession planning.

### Requirements for Senior Instructors

This section will provide information on:

- Oversight of student record completion and accuracy.
- Temporary CFI approvals for Senior Instructors.
- When can SI do checks/renewals.
- Operations at Satellite Operations.
- Endorsements that can be issued by SI.



Senior Instructors are a pivotal role in flight training delivery and assistance to the CFI with flight school operation and development. The scope for a competent SI in the training role is quite broad, however limitations exist and are outlined in the RAAus Operations Manual. These limitations include the conduct of flight tests for Pilot Certificate applicants and Cross Country endorsements, which is the exclusive domain of the CFI. The SI also cannot conduct Instructor proficiency checks, however he or she can actively be involved in the mentoring and standardisation employed at the school.

Nonetheless the operational authority for a Senior Instructor includes the ability to operate without direct supervision and conduct of all aspects of ab-initio flight training, on ground and in the air at the primary Flight Training School and any satellites. The remainder of the endorsements available in the RAAus Operations Manual may be issued under SI authority provided the SI holds the endorsement with sufficient aeronautical experience. The SI may also conduct Pilot Certificate holder Biennial Flight Reviews (BFR) and supervise Instructors with written Operations approval.

### Requirements for Instructors

This section will provide information on:

- Recency and currency.
- Medical maintenance and administration.
- Limitations.
- Direct supervision requirements.

In addition to the general requirements and those outlined in the RAAus Operations Manual the holder of a RAAus Instructor rating must be aware of the limitations and renewal requirements of the rating. These differ from CASA Grade 3 CASA Flight Instructor Rating, which must be carefully managed by the CFI of schools operating combined GA and RAAus operations. These differences also apply to supervision requirements and Instructors are referred the guidance material on Instructor supervision contained in RAAP 3 Instructor Supervision <https://members.raa.asn.au/documents-and-forms/raaps/>.



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In relation to checks, the 90 day proficiency check with the CFI should be seen as an opportunity to ensure standardisation and consistency, review specific training delivery issues and an opportunity to further develop skills and explore any specific training difficulties. Standard flight training elements and briefings should form part of the check flight rather than simply a “lap around the block” with the CFI. A 90 day proficiency check can be incorporated into a biennial Instructor renewal at the discretion of the CFI but a Pilot Certificate BFR cannot substitute for the more complex and detailed Instructor renewal. As noted in the RAAus Operations Manual the completion of any Instructor or higher renewal also resets the BFR requirement.

### Medical requirements

Instructors are required to hold a higher medical standard than that of a Pilot Certificate holder. The required minimum is a CASA Class 2 Aviation Medical Certificate or higher, or RAAus Medical Questionnaire and Examination form completed by the candidate's usual General Practitioner. For compliance and documentation purposes it is important to supply a copy of any interim Medical Certificates or renewed Medical Certificates to RAAus at [members@raa.asn.au](mailto:members@raa.asn.au) for addition to the member's file. Instructors must also immediately advise RAAus if any variation from required health standards using the same email address. Further reference should be made to the appropriate medical requirements section of the RAAus Operations Manual.

### Instructor renewals

Previous to gaining an instructor rating the only renewal requirements were a Biennial Flight Review. As an instructor you will now be required to complete an instructor renewal. Completion of an Instructor renewal will also reset your BFR.

*“The exhilaration of flying is too keen, the pleasure too great, for it to be neglected as a sport”* Orville Wright