



Declared Training Organisations – Future regulations for PPL training

John Wickenden / Justin Willcocks
CAA GA Unit
March 2017>

The Current Systems

- Registered Training Facilities
 - Introduced under JAR-FCL in 1999
 - Simple paperwork exercise in UK, no Authority oversight . Additional standards / guidance published in Std Doc 11
 - PPL training system much as it had been for decades
 - Last RTF accepted in September 2012
- Approved Training Organisations
 - Introduced by EASA and applied since September 2012
 - More structured, requirement for Ops, Trg manuals and a management system. Oversight from CAA - maximum of 3 years between visits
 - Considered to be too burdensome by many for many small PPL training organisations

Current Systems continued

- All RTFs were to become ATOs by 8/4/2015
- EASA issued a derogation in October 2014, extending the deadline until 8/4/2018
- Work commenced in early 2015 to find a 'third way', replacing the RTF system but to be less burdensome than the ATO.
- In the meantime the CAA has developed a more proportionate 'non-complex ATO' system for those organisations newly established, wishing to convert from RTF or operating FIC, IR or MEP courses (NOT Complex ATOs conducting CPL or higher)

FUTURE REGULATORY SYSTEM

- Final Product is the “DECLARED TRAINING ORGANISATION” (DTO)
- Applicable for Aeroplanes and Helicopters
- Sailplane licences and ratings*
- Balloon licences and ratings*
- (*requirements derogated until 2020)

Scope of the DTO

Aeroplanes	Helicopters
<p>LAPL(A) – both theory and flight training</p> <p>PPL(A) – both theory and flight training</p> <p>LAPL(A) Extension</p> <p>LAPL(A) to PPL(A) upgrade</p> <p>SEP (Land) Class Rating</p> <p>SEP (Sea) Class Rating</p> <p>TMG</p> <p>Night Rating</p> <p>Aerobatics Rating</p> <p>Mountain Rating</p> <p>Sailplane and Banner Towing Rating</p>	<p>LAPL (H) – both theory and flight training</p> <p>PPL (H) – both theory and flight training</p> <p>LAPL(H) extension</p> <p>LAPL(H) to PPL(H) upgrade</p> <p>Type Ratings for any single engine helicopter with a maximum certified seat configuration of less than 6.</p> <p>Night Rating</p>

DTO Timescale

- Final Opinion produced January 2017
- EASA Committee vote March 2017? Yes/no
- To European Parliament for vote Summer 2017
yes/no
- Published on EU Official Journal (becomes EU Law)
Autumn 2017
- CAA can start receiving applications as soon as it
becomes EU Law
- All existing RTFs that want to continue offering
training MUST convert by 8/4/2018
- RTFs expire legally on 8/4/2018

WHAT CHANGES FROM RTF?

- Key elements are
 - Requirement for simple Safety Management
 - Mandatory Annual review to be sent to CAA
 - Oversight Inspections and Audits by the CAA
 - Must use a 'validated' Training Programme
 - There will be a proportionate annual fee

WHAT CHANGES FROM AN ATO?

- Main changes are
 - No mandatory Ops / Training or Management System manuals
 - Simpler Safety system and no 'formal' compliance monitoring
 - No formal approval of management staff
 - No waiting for manuals to be approved
 - No formal Approval of organisation
 - Quicker, simpler declaratory process

Requirements to be a DTO

- Organisation must send in a declaration with associated fee to the CAA. Training can start straight away
- Training must be in accordance with a verified Training Programme
- DTO must conduct an annual review and send it to the CAA
- CAA will visit periodically to conduct oversight inspections / audits
- Organisation must notify CAA of any changes to the information given on the declaration (send in a new form)

The Declaration form

- Who are you (company id)?
- Where do you train from?
- Names of key postholders?
- Type of training offered?
- Training Programmes used?
- Aircraft used? Any FSTDs?
- Any subcontracted activity?
- Confirmation that you have and adhere to a safety policy?

Who are you?

- A DTO can be a limited company or a sole trader, but we do need to know the legal name and, if applicable, the trading name.
- If you are registered with Companies House we will need to know the Companies Registration Number
- We need your contact details and registered address as well as training site addresses

Where do you train from?

- CAA will only accept declarations from Companies based in / operating in the UK.
- DTOs for FW/RW can train from a maximum of 2 sites* except in exceptional circumstances (discuss with CAA)
- No DTO can establish a satellite (or second) site outside of an EASA state (so no training in the USA etc)
- You can have a satellite (second) site in another EASA country but 'co-operative oversight' will apply
- We need evidence you have permission to operate from the airfields specified
- * this does not include airfields used as 'landaways' on training sorties, but sites where the main training activity is based.

Facilities Needed

- Airfield does not need to be Licensed but must be suitable for the training you offer (see CAP793)
- The DTO 'accommodation' must have the following
 - Area for flight planning with maps etc
 - Area for briefing / debriefing
 - Classroom for ground school if offered
 - Rest Area for students / instructors
 - Area for instructors to work
- The above can be combined depending on the size and scope of the DTO operation.

Key Postholders

- Company Representative
 - Normally the Accountable Manager / Managing Director
 - Overall responsibility for compliance with the regulations and training scope
 - Overall responsibility for ensuring the DTO meets the requirements of its Safety Policy
- Head of Training
 - In charge of day-to-day training matters
 - Supervises instructors and students
 - HT must have unrestricted FI with 100 hrs instructional experience *after the FI restriction has been removed*
- One person can fulfil both roles

Acceptance of Key Postholders

- The Authority is not required to officially accept nominated postholders
- Company Representative and Head of Training will be unacceptable if any the following sanctions have been imposed within the 3 years preceding the declaration being made or occur subsequently
 - Licensing action has been taken against that person
 - Responsible for a deliberate non-compliance with the Basic Regulation and/or implementing rules
 - Any criminal convictions that make it inappropriate for that person to hold the post
- The DTO is obliged to inform the Authority if the above are applicable

Training Programmes

- A training programme is required to be submitted for each proposed course
- Need to be validated to ensure they comply with Part FCL (and, if applicable, the aircraft type OSD report)
- Validated Commercially produced Training Programmes are acceptable
- If the DTO writes it's own Training Programme, it must be submitted for validation by the CAA. A separate fee will apply
- The DTO may use the programme whilst the CAA are reviewing it. However, if the Authority finds the TP is non-compliant the DTO must take remedial action for any students trained

Training Programme (continued)

- A Training Programme is not simply a list of exercises / manoeuvres to be completed on a course, it should also include
 - An explanation of the purpose of the course
 - Pre-entry requirements for the course, credits for previous experience
 - A list of all Flight training and synthetic exercises to be taught including
 - An objective for each specific lesson or air exercise
 - A completion standard for each specific lesson or air exercise
 - Structure and content of any required theoretical knowledge instruction
 - Any progress checks to be included in the course
 - An overall syllabus summary including details of how the different elements will be integrated

Safety Policy and System Requirements



- When making the initial declaration the Company Representative must confirm that the Organisation has a safety policy which it has developed and it will operate in accordance with
- The Safety Policy shall define the means and methods used for
 - i) Risk identification
 - ii) Risk Assessment
 - iii) implementation of risk mitigation measures
 - iv) review of the adequacy of iii) above
- CAP1059 provides useful guidance

In practical terms....

- Have a documented Safety Policy
- Have a documented system which
 - Identifies your risks and hazards
 - Details mitigations you have / will put in place to reduce the risk
 - Checks how effective these risk mitigations are
 - Allows for people to make safety reports
- Maintaining a Hazard Log is an effective way of documenting risks and mitigations
- You are also expected to be familiar with and operate in accordance with the EU rules on Mandatory Occurrence Reports (EU376/2014)

Annual Review

- DTOs will be required to conduct an Annual Review. The purpose of this is to assist the DTO in highlighting what has been done well and what could be improved.
- The review, upon completion must be submitted to the allocated inspector who will review the information supplied as part of the oversight of the DTO
- The Inspector will advise you, when you first make your declaration, when the Annual Review is due.
- The Annual review consists of two elements, one being activity based and the other performance based
 - Annual Activity Review
 - Annual Internal Review

Annual Review – Activity Review

- The activity review shall detail the following data
 - All training courses and refresher training activity provided;
 - Names of all students, courses on which enrolled and training status;
 - Names of all instructors (flying and theory) involved in the training offered under the DTO, the courses on which they teach and date of joining the DTO (if within the last 12 months);
 - Skill test and Theory Examination passes and failures in the last 12 months;
 - List of training aircraft (and FSTDs if applicable) used by the DTO in the last 12 months.

Annual Review – Internal review

- The annual internal review is designed for the DTO to evaluate the effectiveness of their safety system, adequacy of the training offered and their compliance with applicable regulations. It must include -
 - Hazards and risks identified as affecting the Organisation
 - the Effectiveness of mitigations put in place against the above
 - Analysis of safety reports made and follow up actions;
 - Overall adequacy of the Organisations safety policy
 - Adequacy of the training practices in relation to the skill test / Theory exam pass rate
 - Performance of Flight and Theory Instructor standardisation;
 - Adequacy of DTO Training Programmes

CAA Oversight 1

- The Authority will conduct oversight visits of all DTOs periodically
- The maximum period between oversight visits will be 72 months, although visits might take place more frequently
- The oversight frequency will be determined on the basis of the nature of the organisation, complexity of its activities, results of previous audits (including Annual reviews), performance and risk.
- Any 'new' DTO (one not previously an RTF or ATO) will be visited within 1 year of CAA receiving the declaration.
- Any RTF converting to DTO will be visited within 5 years of CAA receiving declaration, however the visits to all DTOs will be spread over the period 2018-2022.

CAA Oversight 2

- The oversight may include scheduled and unscheduled inspections and sampling of training activity
- For a scheduled visit the inspector will try to give three months notice, so as to agree a suitable date
- A DTO oversight inspection will focus on, but not be confined to, reviewing safety related items such as
 - Safety Policy, risk identification and mitigation, safety reporting
 - Training records and adherence to training programme
 - Aircraft and aircraft documentation
 - Suitability of Sites and facilities
 - Plus an overview of compliance with applicable regulations

Oversight 3 - Findings

- If, during oversight, something is found that indicates a non-compliance with the applicable requirements by a DTO the LSI will;
 - Raise a finding, record it and communicate it in writing to the Nominated Postholder of the DTO and determine a period of time within which the DTO shall take corrective action,
- If a safety problem has been identified the DTO must take immediate and appropriate action and, if necessary, limit or to stop the training activity until successful corrective action is taken
- Where a DTO fails to take corrective action in accordance with the regulation, the Authority may chose to suspend all or part of the DTO'S activity until a satisfactory resolution is put in place

Records

- The following training records must be kept for each student:-
 - Personal details, including name, address plus details of any licences / ratings held and expiry dates (inc Medical)
 - Records of Theoretical Knowledge and Flight Instruction; including date, instructors name, aircraft registration (if applicable), hours completed, exercises undertaken, progress,
 - Records of Flight Tests, Theoretical knowledge exams and any progress tests taken
 - It is recommended that DTOs ask their students to sign training records to show acceptance of any comments on progress

Changes to the Declaration

- Any changes to the information supplied on the original declaration concerning;
 - Changes to the Legal entity
 - Changes to the Nominated personnel
 - Changes / Additions to the Training Programmes offered must be notified to the Authority within 3 days, using the DTO application form
- Changes to the aircraft fleet should be notified as part of the Annual Review process
- If the DTO ceases training / trading it must notify the CAA. If no training has taken place for 3 years since the previous declaration, a new declaration must be made.

What happens next

- We are still waiting to hear from EASA / EU that DTO will be accepted. If not, it will be ATOs
- GA Unit have prepared a Guidance Document on the subject which will be released as soon as we know what is happening.
- Declaration form has been prepared
- Fees are being calculated and will be published
- Training programme – working on verifying some industry produced documents.

Thank you - Questions

