

Guidance Criteria for Declared Training Organisations

CAP 1637



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Prelims

Foreword

The purpose of this document is to provide guidance for organisations or person seeking to register as a Declared Training Organisation (DTO), offering courses of training towards Light Aircraft and Private, Sailplane and Balloon Pilot Licenses, endorsements, ratings and certificates where the principal place of business and registered office are located in the United Kingdom. The CAA will not accept any declarations from Organisations not meeting this criteria.

Further information may be obtained from:

European Aviation Safety Agency
Flight Crew Licensing Organisation Approvals
Konrad Adenauer Ufer 3
D-50668 Koln
Germany

Email: fcloa@easa.europa.eu

Website: www.easa.europa.eu

This document and other CAA Standards Documents are available at www.caa.co.uk/fclstandards website and can be downloaded to users without charge.

It should be noted that this document is subject to change as information is disseminated from the European Aviation Safety Agency or from other National Regulation.

Nothing in this document is intended to conflict with the EASA Aircrew Regulation or UK statute law where applicable. Whilst every effort is made to ensure that all information is correct at time of publication, the CAA reserves the right to amend this document as required to accommodate changes to the primary authority documents, to correct errors and omissions or to reflect changes in national policy and best practice.

If, after reading this document, you still have queries please contact the General Aviation Unit at the Civil Aviation Authority:

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Glossary of Abbreviations and Terms

AMC	Acceptable Means of Compliance (EASA)
ANO	Air Navigation Order (2016)
ARA	Authority Requirements for Aircrew
ATO	Approved Training Organisation
BPL	Balloon Pilot Licence
CAA	Civil Aviation Authority (UK)
CAMO	Continuing Airworthiness Maintenance Organisation
CEP	Custodian of Examination Papers
CFI	Chief Flying Instructor
CPL	Commercial Pilot Licence
DTO	Declared Training Organisation
EASA	European Aviation Safety Agency
EU	European Union
FE	Flight Examiner
FSTD	Flight Simulation Training Device

FI(R)	Flight Instructor Restricted
FIE	Flight Instructor Examiner
GAU	General Aviation Unit
GM	Guidance Material (EASA)
GR	Ground Examiner
HT	Head of Training
LAPL	Light Aircraft Pilot Licence
LSI	Licensing Standards Inspector
HT	Head of Training
JAR	Joint Aviation Requirements
MTOW	Maximum Take-off Weight
NAA	National Aviation Authority
OM	Operations Manual
ORA	Organisation Requirements for Aircrew
PPL	Private Pilot Licence
RTF	Registered Training Facility
SEP	Single Engine Piston (Class Rating)
SM	Safety Manager
SMS	Safety Management System
SPL	Sailplane Pilot Licence
TM	Training Manual
TMG	Touring Motor Glider
TP	Training Programme

Chapter 1

Introduction

Current Legislation and Status

- 1.1 The EASA Aircrew Regulation, Commission Regulation (EU) No 1178/2011 of 3 November 2011 lays down the technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council. This was amended as of 30 March 2012 by Commission Regulation (EU) No 290/2012 to include Part Organisation Requirements for Aircrew (ORA) and Authority Requirements for Aircrew (ARA).
- 1.2 The Aircrew Regulation came into force on 8th April 2012 with an implementation date in the UK of 17th September 2012. EASA became the competent authority for organisations approved by the UK CAA prior to this date for which the principal place of business is located outside of the EU.
- 1.3 Requirements for Approved Training Organisations (ATO) are laid down in the Part ORA and the Acceptable Means of Compliance (AMC) to Part ORA. The requirements for Declared Training Organisations (DTO) are laid down in Part DTO. and the AMCs to Part DTO.
- 1.4 Registered Training Facilities (RTF) registered with the CAA before 17 September 2012 shall be deemed to hold a certificate issued in accordance with the Regulation. Such organisations will require to convert to DTO by a date to be advised by EASA and the EU Parliament..
- 1.5 The provisions of the regulation do not allow for a DTO to be established where its Principal Place of Business is located outside an EASA member state. Thus the CAA will not accept any applications where the training site is outside of the United Kingdom. In accordance with regulations, any Organisation located outside EASA wishing to offer such training within the scope of the DTO will be required to seek approval as an Approved Training

Organisation and application must be made direct to EASA. Further guidance on the definition of Principal Place of Business can be found in the Aircrew Regulation, Annex VI (Part ARA), ARA.GEN.105.

Purpose of this Document

- 1.6 This document is intended to serve the following purposes:
- help new organisations ensure that a declaration as a DTO satisfy EASA requirements;
 - assist current RTFs who require to become a DTO;
 - explain administrative arrangements and legal matters in relation to how the CAA will administer DTOs; and
 - give guidance to organisations to ensure continued compliance as and when there are any appropriate or necessary changes to the organisations.

This document should be read in conjunction with the relevant provisions of EASA Aircrew Regulation Part-FCL, Part-ARA, Part-ORA and Part-DTO.

National Licence, Rating or Certificate Courses

- 1.7 Organisations offering training towards the grant of the UK National Private Pilot Licence (NPPL) should contact the Light Aircraft Association (LAA) or British Microlight Aircraft Association (BMAA).
- 1.8 Organisations offering training for a National PPL(Balloons) or PPL(Gyroplanes) licence do not require to be a Declared or Approved Training Organisation.
- 1.9 Organisations offering training for a National FI Certificate for Microlights must meet the requirements laid down in the BMAA Training Manual.
- 1.10 Organisations offering training for a National CPL(Gyroplanes) and / or FI Certificate for Gyroplanes will be required to hold a National ATO approval, guidance for which will be published in a separate document.

- 1.11 Where the EASA Aircrew Regulation does not contain aspects of other training, this training will be subject to the UK Air Navigation Order 2016, as amended.

Scope of Activity of the Declared Training Organisation

- 1.12 In accordance with DTO.Gen.110, A Declared Training Organisation may offer training for the following, Licences, Ratings, Certificates and/or Authorisations:

Table 1

Aeroplanes	Helicopters
LAPL(A) – both theory and flight training	LAPL (H) – both theory and flight training
PPL(A) – both theory and flight training	PPL (H) – both theory and flight training
LAPL(A) Extension	LAPL(H) extension
LAPL(A) to PPL(A) upgrade	LAPL(H) to PPL(H) upgrade
SEP (Land) Class Rating	Type Ratings for any single engine
SEP (Sea) Class Rating	helicopter with a maximum certified seat
TMG	configuration of less than 6.
Night Rating	Differences Training in accordance with the
Aerobatics Rating	published Type Operational Suitability Data
Mountain Rating	report.
Sailplane and Banner Towing Rating	Night Rating

Sailplanes	Balloons
LAPL(S) – both theory and flight training	LAPL(B) – both theory and flight training
SPL – both theory and flight training	BPL – both theory and flight training
LAPL(S) to SPL upgrade	LAPL(B) to BPL upgrade
TMG extension course	Class extension
Additional Launch methods	Group Extension
Aerobatics Rating	Tethered Flight Rating
Sailplane Towing Rating	Night Rating
Sailplane Cloud Flying Rating	Flight Instructor (B) Rating
Flight Instructor (S) Rating	Flight Instructor (B) refresher seminar
Flight Instructor (S) refresher seminar	Flight Examiner (B) Standardisation
Flight Examiner (S) Standardisation	Flight Instructor Examiner (B)
Flight Instructor Examiner (S)	Standardisation
Standardisation	Flight Examiner (B) and Flight Instructor
Flight Examiner (S) and Flight Instructor	Examiner (B) Refresher Seminar
Examiner (S) Refresher Seminar	

It should be noted that the Instrument Meteorological Conditions Rating (IR Restricted), is a UK National Rating and thus it is not included in the above list. Any organisation or instructor wishing to offer training for this rating is not, at the moment, required to be registered with the CAA as either a DTO or an ATO.

Chapter 2

Declaration Process

Basic DTO Principals

Prior to declaration

2.1 The following information should be considered prior to application:

- A DTO is considered to be a single organisation staffed, equipped and operated in a suitable environment offering flight training, synthetic flight instruction and/or theoretical knowledge instruction.
- A DTO may conduct more than one kind of training course providing these fall within the scope listed in Table 1. However, the CAA will require assurances that satisfactory arrangements are put in place to conduct a combination of courses.
- A DTO contracting activities should be aware of the requirements of ORA.GEN.205, AMC1 ORA.GEN.205 and GM1 ORA.GEN.205.
- Where training is conducted at multiple locations, all sites will be subject to declaration and oversight.

Application for a Declared Training Organisation in a Non-EASA State

2.2 As stated in Paragraph 1.5 an organisation with its Principal Place of Business outside of an EASA Member State cannot make declaration as a DTO. Thus the CAA will not accept any applications where the Principal Place of Business is outside of the United Kingdom. In accordance with regulations, any organisation located outside EASA wishing to offer such training within the scope of the DTO will be required to seek approval as an Approved Training Organisation (ATO) and application must be made direct to EASA. The Channel Islands and the Isle of Man are not members of EASA or the European Union and, thus, the CAA cannot accept applications

from organisations located in these territories. Further guidance on the term 'Principal Place of Business' may be found on the CAA website.

Whilst the regulations do not prohibit the establishment of satellite sites outside of the country of declaration, regulations permit National Authorities to refuse applications if they would place an undue burden upon them.

Where the CAA undertakes such work, DTOs will be charged on a full cost recovery basis.

The Declaration Process

Application and Fees

- 2.3 An organisation wishing to offer training under the scope of Table 1 must submit a DTO Declaration prior to starting any training activity using form SRG2145. Any subsequent changes or variations to the information supplied on the original declaration should be notified to the CAA using the same Declaration form amending only the information which has changed.
- 2.4 When making a initial declaration as a DTO, or to amend or vary an existing declaration, the organisation should ensure that any documents provided are both complete and accurate. The material should also clearly demonstrate full compliance with all relevant Part-FCL, Part-ORA and Part DTO requirements. As declarations are processed on a 'first-come, first-served' basis, any omissions or errors in submitted material will inevitably delay the process.
- 2.5 The initial fees are payable upon declaration ([see the CAA Personnel Licensing Scheme of Charges](#)).
- 2.6 Where additional work is required to validate a training programme as compliant with EASA requirements (see Part 4) a fee will be payable which covers a minimum of hours the CAA believes should be sufficient to complete the work. Hours in excess of these will be invoiced monthly in arrears to the applicant DTO. Please refer to the latest Personnel Licensing Scheme of Charges for the current hourly rates www.caa.co.uk/ors5, Section 6.

- 2.7 The CAA will consult on the annual fees for DTOs in November 2018 with planned implementation from 1 April 2019.

Language

- 2.8 The CAA will only accept declarations from organisations who deliver training to students in English. All course material, including any documentation or records required, must be in English. Training organisations must ensure that students for whom English is not their first language have a comprehensive understanding of spoken and written English and have been assessed, by a Approved English Language Training School, to meet a minimum operational level (Level 4) before admitting them onto a course. Non-native English speakers may not be assessed by a Flight Examiner.
- 2.9 Where the course is conducted in a non-English speaking State (e.g: at a second site), the Head of Training (HT) shall ensure, before the start of the course, that students are capable of understanding all relevant material concerning flight safety produced in that Member State.

Items Required for Submission for Initial Declaration

- 2.10 The initial Declaration must be submitted to the CAA using form SRG2145 and must contain the following information:
- Name of the DTO (including legal entity and trading name if applicable);
 - Contact details of the organisation's principal place of business, main training site (if different) and, if applicable, the contact details of any other operating site;
 - Names of the Representative and Head of Training (see para 3.1 for more details);
 - Type of training to be provided (as per Table 1);
 - List of all aircraft and Flight Synthetic Training Devices (FSTD) to be used for training;

- Information on the training programmes to be used (see Chapter 4 for more details). If not previously validated as compliant with the appropriate regulations, training programmes for each course offered must be submitted;
- Details of any sub-contracted activity (such as aircraft maintenance); and
- Confirmation that the organisation has a safety policy by which it operates.

In addition to the above, the following items should be submitted:

- Confirmation of Legal Entity of the organisation, e.g. a copy of the company registration document for limited and public limited companies or confirmation of the Companies House number (see Appendix A);
- Relevant application fees as detailed in the Personnel Licensing Scheme of Charges (www.caa.co.uk/ors5);
- Proof of permission to operate from relevant airfields; and
- Copies of FSTD qualification certificates and user approval certificate (if FSTDs are to be used).

2.11 It is important that DTOs provide a single email address to be used for all communication between the CAA and the DTO. Any changes to the email address supplied must be communicated to the CAA.

Progress of an Declaration

Submitting the Declaration

- 2.12 The organisation may commence training on the courses specified on their declaration as soon as the Declaration has been submitted.
- 2.13 AMC1.ARA.DTO.100(a) states that the Competent Authority (in this case the UK CAA) should acknowledge receipt of the declaration to the DTO in writing within 10 working days. The CAA will either confirm receipt of an acceptable declaration form within the 10 days or will request further details, if necessary.

- 2.14 It is the responsibility of the organisation to check that the CAA has received the declaration if they have not had any such acknowledgement within 20 working days following the original submission of the declaration.
- 2.15 Where incorrect or incomplete information is supplied, the CAA will notify the applicant as soon as possible by letter or email detailing any errors or omissions. In such cases, where further details are required and the declaration form needs to be resubmitted, a further 10 working day period will start upon receipt of the additional information.
- 2.16 Where a previously unvalidated training Programme is submitted, the organisation should be aware of the conditions stated in Chapter 4.

Allocation of a Licensing Standards Inspector

- 2.17 When a declaration form has been received, with the relevant fee and any other associated documentation, a Licensing Standards Inspector (LSI) will be assigned to oversee the application process and review the relevant documentation. The LSI will from then continue to work with the DTO, conducting oversight visits, collating and assessing Annual Reviews and will be the Organisation's main point of contact within the CAA for matters related to the DTO.

DTO Validity and Identification

- 2.18 Under EASA Aircrew Regulations a DTO declaration remains valid without expiry unless revoked or suspended by the CAA or unless the DTO has not conducted any training for a period of 36 months. However, the DTO is obliged to notify the CAA of any changes to the information supplied on the original and subsequent declarations.
- 2.19 The CAA will allocate a unique Identifying Number to each DTO. The CAA will notify the DTO of this by returning a copy of the original declaration with the number added and an official signature, recognizing the DTO. This should be retained by the DTO.
- 2.20 For continued oversight of an organisation, the CAA will follow the procedure detailed at ARA.GEN.305 and in Chapter 6 of this document.

Chapter 3

Requirements and Guidance for DTO Submission

DTO Postholders / Staffing

DTO.GEN.210 / AMC2 DTO.GEN.210

The DTO shall designate the following postholders:

3.1 Responsible Representative

The Responsible Representative fulfils the same role as that as the person known as the Accountable Manager elsewhere in the Aircrew Regulation and other EASA Organisational requirements.

The roles and responsibilities of the Responsible Representative shall include at least the following:

- (i) Ensuring the DTO and its activities comply with the applicable requirements as well as with the declared scope of the organisation;
- (ii) Developing and implementing a Safety Policy which aims for the safe operation of all activities and ensuring that the DTO adheres to this. This shall include development of appropriate measures and risk mitigations necessary to achieve the aims of the Safety Policy;
- (iii) Promoting safety within the DTO;
- (iv) Ensuring sufficient resources are available within the Organisation to allow points i) to iii) to be achieved.

The CAA anticipates that the post of Responsible Representative should *normally* be filled by the Managing Director or Club Chairman. This role will be the focal point within the DTO for the CAA. The Responsible Representative may delegate another person to act as the focal point, but this person's role must be clearly defined and communicated to the CAA. In such cases the Responsible Representative still retains ultimate responsibility for points i) to iv) above.

3.2 Head of Training

The Head of Training (HT) shall be responsible for the following:

- (i) Ensuring that the training provided complies with Part FCL and the DTO's declared training programmes;
- (ii) Overall supervision of student progress and ensuring that all have successfully completed all of the training in accordance with Part FCL and the training programme;
- (iii) Satisfactory integration of flight, synthetic flight (if applicable) and theoretical knowledge instruction during the training courses offered by the DTO;
- (iv) The adequacy of the training offered;
- (v) Monitoring of and implementation of updates to the DTO training programmes;
- (vi) Monitoring the correct application of training standards by the DTO's instructional staff and thus supervision and standardisation of the DTO instructional staff.

The Head of Training (HT) shall hold or have held an unrestricted Instructor certificate with privileges to allow training to be conducted for the training courses to be undertaken and using the relevant aircraft category together with have sufficient experience in order to administer the training activity of the DTO and fulfil the functions shown in points I to vi above.

Where the DTO offers training on more than one aircraft category (e.g. aeroplanes and helicopters), the HT must meet the above criteria for at least one of the categories. He should then be assisted by one or more nominated deputy HTs qualified with regard to the other category / categories of aircraft.

3.3 Deputy Head of Training

Where the DTO operates from more than one airfield or training site, the Head of Training should designate a Deputy Head of Training for each site that is not the primary site (see para 3.8). The Deputy Head of Training shall be responsible for the tasks detailed in 3.2 points i to vi .

3.4 Duplication of Roles

The role of Company Representative and Head of Training maybe be fulfilled by the same person.

3.5 Acceptance of Nominated Personnel

The CAA is not required to accept nominated postholders. However, it should be noted that persons put forward to fulfil the role of Company Representative and Head of Training will be deemed as unacceptable if the do not hold the requisite Instructor qualifications or if the following sanctions have been imposed:

- (i) The nominated person has been subject to suspension, limitation or revocation of any part of their licence, ratings, certificates or authorisations within the three years preceding the declaration being made;
- (ii) The nominated person has knowingly and deliberately been responsible for any non-compliance with the Basic Regulation and it's Implementing Rules and the Air Navigation Order (as amended) within the three years preceding the declaration being made; or
- (iii) If the nominated person has any criminal conviction which, it is deemed by the CAA, makes it inappropriate for them to hold such a post.

In such circumstances the CAA will raise a finding against the DTO to say that it is non-compliant with Part DTO and training activity may be restricted. The DTO will be required to submit a further nomination with evidence that the subsequent nominee can effectively discharge the responsibilities of their role.

3.6 DTO Staffing

- (i) The DTO postholders shall ensure that the organisation is staffed by sufficient instructional and other staff for the planned tasks and activities being performed in accordance with the declaration.

- (ii) Flight and Flight Simulator training instructors shall hold the qualifications required by Part-FCL for the nature of the training to be conducted.
- (iii) Specialist Theoretical Knowledge Instructors shall have a practical background in aviation in the areas relevant to the training provided and have undergone a course of training in instructional techniques. Alternatively they may have previous experience in delivering theoretical knowledge instruction and an appropriate theoretical background in the subject on which they will be providing training.

Training Sites and Facilities

Aerodromes and Operating Sites

DTO.GEN.250 / AMC1 DTO.GEN.250

- 3.7 When providing flight training towards any of the licences and ratings included in Table 1 (aeroplanes, helicopters and sailplanes) of this document, the DTO must use aerodromes or operating sites that have the appropriate facilities and characteristics to allow for training of the relevant manoeuvres.
- 3.8 DTOs offering training on aeroplanes and helicopters may offer training from multiple aerodromes / training sites. In such cases one site must be designated as the primary training facility whilst a Deputy Head of Training must be designated at each additional site (see paragraph 3.3). Furthermore, the designated responsible person for the DTO must ensure that the organisation has sufficient resources to ensure safe operations at all sites and compliance with all of the requirements of Part DTO.
- 3.9 The 'Primary' site and other base aerodromes are defined as those at which the DTO performs its training activity, where its training fleet is based and where it has training facilities. Aerodromes / sites which are used as 'landaway' destinations during such training sorties as navigation, do not count as base aerodromes.

- 3.10 Aerodromes in use for training should exhibit at least the following characteristics:
- at least one runway or final approach and take off area (FATO) that allows a training aircraft to make a normal take off or landing within the performance limits of the aircraft used for training flights;
 - a wind direction indicator that is visible at ground level from the ends of each runway or at the appropriate holding point;
 - adequate runway electrical lighting if used for night training;
 - an air traffic service, except for uncontrolled aerodromes or operating sites when the training requirements may be satisfied safely by another acceptable means of communications.
- 3.11 In addition, for helicopter training, areas should be available for:
- Confined area operation training;
 - Simulated engine off autorotation;
 - Sloping ground operations
 - Quickstops.
- 3.12 In the case of balloons, the take off sites used by the DTO should allow for a normal take off and the clearing of all obstacles in the take off flight path by at least 50 feet.

Unlicensed Aerodromes

- 3.13 In accordance with Article 208A of the ANO as amended, flying training may be conducted by an DTO from unlicensed aerodromes using fixed wing aircraft up to 2730 kg MTOW, and helicopters or gyroplanes up to 3175 kg MTOW, provided that the HT, aerodrome operator and the pilot in command of the aircraft are satisfied on reasonable grounds that the aerodrome is suitable for the purpose and should meet the requirements of [CAP 793 - Safe Operating Practices at Unlicensed Aerodromes](#). Use of an unlicensed aerodrome as a DTO's base aerodrome or alternative base aerodrome is subject to the consent of the CAA.

CAP 793 includes guidance on how to assess whether an aerodrome is suitable for training: where flying training is taking place additional safety margins shall be considered. All DTOs shall ensure that adequate risk assessments are made and documented before flying training takes place as required under the Company's Safety Policy (AMC1.DTO.GEN.210).

Facility Requirements

DTO.GEN.215 / AMC1 DTO.GEN.215

3.14 The facilities available to the DTO should comprise of:

- 1) Flight planning facilities
 - a) Appropriate current aviation maps and charts;
 - b) Current AIS information;
 - c) Current meteorological information;
 - d) Communications to ATC (if applicable);
 - e) Any other flight safety related material.
- 2) Adequate briefing room(s)/cubicles of sufficient size and number;
- 3) Suitable office(s) to allow flight instructors to write reports on students, complete records and other related documentation;
- 4) Suitable rest areas for instructors and students, where appropriate to the training task;
- 5) In the case of DTOs providing training for the BPL or LAPL(B) only, the flight operations accommodation listed in (1) and (4) may be replaced by other suitable facilities when operating outside aerodromes.
- 6) Where records are kept on site they should be in a lockable filing cabinet.

3.15 The following facilities for theoretical knowledge instruction should be available:

- 1) Adequate classroom accommodation for the current student population;

- 2) Suitable demonstration equipment to support the theoretical knowledge instruction;
 - 3) Suitable office(s) for the instructional personnel.
- 3.16 A single room may be sufficient to provide the functions listed in paras 3.14 and 3.15.

Training Aircraft

- 3.17 The EASA requirement for training aircraft is detailed at DTO.GEN.240. Specifically the DTO must use a fleet of aircraft which is adequate and appropriate to the training which is being provided.

In determining fleet size the DTO shall ensure that a sufficient number of aircraft suitably equipped and appropriate to the course on offer are provided to achieve continuity of flying training for the number of students attending the courses. The requirements for routine maintenance and use of aircraft for other purposes must be taken into account when determining fleet size.

Each aircraft used for training shall be fitted with duplicated primary flying controls for use by the instructor and the student. "Swing over" controls are not permitted. Robinson helicopter cyclic controls are not considered swing-over controls for this purpose.

The HT of the DTO is responsible for ensuring that all aircraft are suitable for the training for which they are used and that all relevant documentation and certificates relevant to the airworthiness and legality of the aircraft are in place and current whilst the aircraft remains on fleet. Any deficiencies in aircraft equipment should be assessed using the risk mitigation system contained within the DTO Safety Policy.

Documents and Manuals

- 3.18 Aircraft must be maintained in accordance with an appropriate maintenance schedule and the following documentation must be available for inspection by the CAA Inspectors during audits:

- Aircraft, engine and component log books as appropriate;
- Certificates of Airworthiness and Registration;
- Mass and Balance Schedules;
- Certificates of Maintenance Review (except where exempt) and Release to Service;
- Aircraft Radio Licences and Radio Installation Approvals;
- Flight Manuals or Pilot's Operating Handbooks;
- Certificates of Insurance;
- Checklists;
- Noise Certificate (if required);
- EU Part M Appendix 1 contract between DTO and CAMO.

3.19 In addition to the items listed above, the record of hours and days remaining to the next maintenance check and the record of rectification or deferring of previously reported defects must be readily available for scrutiny by pilots before each flight.

Criteria for aircraft

- 3.20 Flight, primary engine and associated ancillary instruments, as required by the ANO and appropriate airworthiness requirements, should be fitted. These instruments should be readily visible to both the instructor and the student when sitting normally in their customary seats with seat belts and diagonal shoulder straps or safety harness fastened.
- 3.21 Trim controls, ancillary engine controls, fuel controls, steering, brakes, wheel brakes, and undercarriage controls (where appropriate) and the cabin fire extinguisher should be either duplicated or positioned so that they are accessible to both the instructor and student when sitting normally in their customary seats with seat belts and diagonal shoulder strap or safety harness fastened. Single engine aeroplanes with fuel controls fitted on the left hand side (not accessible by the instructor) may be acceptable.
- 3.22 Each aircraft should be equipped with an appropriate VHF Transceiver controllable from both the student and instructor stations. A two-way intercom should be fitted which permits both pilots to monitor radio

- communication made by either pilot. All in-flight communications should be carried out using headsets.
- 3.23 In addition to meeting the provisions of the appropriate airworthiness requirements, each aircraft must be equipped in accordance with Part NCO and ANO Schedules 5 and 6.
- 3.24 Aircraft insurance must be compliant with EC Regulation [EC] No 785/2004 - Insurance Requirements for Air Carriers and Aircraft Operators. Cover must also include CAA staff when carrying out inspections or testing.
- 3.25 Where an aircraft is operated by a DTO which is not the owner of the aircraft, a letter of operational transfer or lease agreement should be in place to support the validity of the insurance.
- 3.26 Where the DTO functions as a 'Commercial Operator' they must maintain their aircraft fleet in accordance with Part M, Para MA201(j), with maintenance conducted by either a Subpart F or Part 145 compliant organisation and the management of maintenance under the oversight of a Subpart G Continuing Airworthiness Maintenance Organisation (CAMO).
- 3.27 The definition of commercial operation according to Regulation (EC) No 216/2008 Article 3 (Definitions) (i) is as follows: "commercial operation" shall mean any operation of an aircraft, in return for remuneration or other valuable consideration, which is available to the public or, when not made available to the public, which is performed under a contract between an operator and a customer, where the latter has no control over the operator."

Technical Logs and Authorisation of Flights

- 3.28 Under current legislation, flight training is considered as a 'commercial operation' i.e: it is conducted for remuneration and thus Part M states that operators must maintain a tech log for all aircraft. The contents of the Technical Log may be found in EASA Part M, section MA.306.
- 3.29 Technical Log Sheets should be left at the initial point of departure.

- 3.30 Where an aircraft is hired for use on a course of training, or where an aircraft used for training ceases to be used by the DTO, a copy of all Technical Logs relating to the training shall be retained by the DTO for a period of 3 years. All Technical Logs shall be maintained in accordance with Part M.

Changes to the fleet

- 3.31 Changes to the fleet of training aircraft shall be notified to the CAA by the DTO as part of the Annual Review.

Flight Simulation Training Devices

ORA.DTO.135 and ORA.FSTD

Device Qualification and User Approval

- 3.32 All FSTDs, when substituting for an aircraft, must be device qualified and user approved to adequately represent the aircraft being substituted.
- 3.33 The basic distinction between device qualification and user approval is that qualification relates to the technical ability of the device to meet requirements, whereas approval relates to the extent to which a device may be used for training, checking or testing, taking into account the aircraft to device differences and the operating and training ability of the DTO. Therefore, user approval links the use of a 'qualified' device to a particular course of training by giving credits against flight time.
- 3.34 Organisations should refer to ORA Subpart FSTD for Flight Simulation Training Devices to ascertain the requirements for device qualification and user approval.
- 3.35 For information on the qualification of Flight Navigation Procedure Trainers (FNPTs) and Basic Instrument Training Devices (BITDs), refer to Standards Document 18.
- 3.36 A qualification certificate will be issued by UK CAA where a device meets the mandatory requirements and the DTO approval certificate will be annotated to reflect which device(s) are acceptable for which course(s). It will therefore

be essential that organisations keep the CAA informed, giving as much notice as possible, where new devices are proposed for training to ensure that approved training can be conducted without interruption to a training course.

Safety Policy and Reporting

DTO.GEN.115(a)(6), AMC1.DTO.GEN.210, DTO.GEN.155, DTO.GEN.160

Content and Purpose of Safety Policy

3.37 When making the initial declaration the Company Representative must confirm that the DTO has a safety policy which it has developed and operates in accordance with.

3.38 The Safety Policy shall define the means and methods used for:

- (i) Hazard identification;
- (ii) Risk Assessment;
- (iii) Implementation of risk mitigation measures;
- (iv) Review of the adequacy of iii) above.

The Safety Policy should also include procedures required to ensure compliance with the Regulations relevant to the Mandatory Occurrence Reporting scheme (EU376/2014). Guidance on the main elements of the Occurrence Reporting scheme can be found in GM1 to DTO.GEN.210(a)(3)

3.39 The Oversight Inspections will include a review of the above points and how these are effective in day to day operations.

3.40 Further guidance of the development of a Safety Policy, risk identification, assessment and mitigation and the development of a hazard log system is available in the Appendices to this document and from CAA document CAP 1059.

Immediate reaction to a Safety Problem

- 3.41 The Safety System developed and implemented by the DTO must ensure that:
- (i) The DTO can implement any safety measures mandated by the CAA (see ARA.GEN.135(c));
 - (ii) The DTO can implement any relevant mandatory safety information issued by the CAA, including Airworthiness Notices.

Occurance Reporting

- 3.42 The DTO shall be aware of its obligations under EU Regulation 376/2014 with regard to Mandatory Occurrence Reporting and ensure that it operates a system whereby all events meeting the criteria listed in Annex V of the regulation are reported to the Authority, using the MOR system on the CAA website.

Records to be kept

- 3.43 DTO.GEN.220 states that the following records shall be kept by the DTO throughout the training course and for at least three years following completion:
- (i) Details of Ground (Theoretical Knowledge), flight and simulated flight training given to individual students;
 - (ii) Student Progress
 - (iii) Information on the licences and associated ratings of the students, relevant to the training provided, including expiry dates of ratings and medical certificates.
- 3.44 In addition the DTO must retain copies of the Annual Reviews, activity reports and any obsolete validated Training Programmes for a period of three years.

Chapter 4

Approval of Training Programmes

Submission of Training Programmes

- 4.1 A training programme is required to be submitted for each proposed course and for each variation of a specific course as per Table 1 (pages 12/13). The Authority is required, under ARA.DTO.110, to verify that each training programme is - and subsequent changes are - compliant with the applicable part of the Aircrew Regulations and approve each programme. In the case of Type Rating courses the CAA will also seek to verify that the Training Programme is compliant with the relevant Operation Suitability Data Report which forms an integral part of the Aircraft Type Certificate. If the Training Programme does not comply with the OSD report it will not be accepted.
- 4.2 Prospective DTOs may devise their own training programmes and syllabi for the licences and ratings, however, such individually developed programmes will require verification and approval action. This extra work will attract a separate fee (see the CAA Scheme of Charges currently in force). Alternatively, a number of commercially produced syllabi may be available (e.g from aviation supply and publishing companies or those developed by consultants / DTOs and previously approved for use at an ATO). It is acceptable to use these third party products, however they must be clearly identified as such on the declaration form, together with the version / edition number and revision date. The inspectors will reference the relevant document while checking student records.
- 4.3 A Training Programme is not simply a list of exercises / manoeuvres to be completed on a course, it should also include:
- 1) An explanation of the purpose of the course;
 - 2) Pre-entry requirements for the course, credits for previous experience;
 - 3) A list of all flight training and synthetic exercises to be taught including,
 - a) An objective for each specific lesson or air exercise;

- b) A standard to be met to achieve proficiency for each specific lesson or air exercise;
- c) Structure and content of any required theoretical knowledge instruction;
- d) Any progress checks to be included in the course;
- e) A overall syllabus summary including details of how the different elements will be integrated.

- 4.4 Where the DTO wishes to use an individually developed training programme they will be required to submit this to the CAA for approval, together with the application form (SRG2144). The allocated Inspector will review this to verify the compliance of the training programme and will confirm the results of this work to the DTO within six months. While the evaluation is taking place, the DTO may, if they so choose, deliver the programme.
- 4.5 If it is subsequently deemed that the programme is not compliant, the DTO must cease using it and will be responsible for any retrospective action / re-training of students who have completed the programme.
- 4.6 Any shortfalls or non-compliances in the training programme will be notified to the DTO who must implement the required changes and re-submit to the CAA within a time period notified to the DTO. Should the DTO fail to make such changes as necessary within the specified time period, the CAA will reject the application to approve the training programme and it may not be utilised any further.

Chapter 5

Changes to the Declaration

Obligations of the DTO

- 5.1 Any changes to the information supplied on the original declaration concerning:
- (i) Changes to the legal entity (see 5.4 and 5.5 below);
 - (ii) Changes to the nominated personnel;
 - (iii) Changes / Additions to the training programmes offered (see 5.3 below;)
 - (iv) Changes to training sites must be notified to the CAA.
- 5.2 Unforeseen changes should be notified at the earliest possible opportunity, in order to enable the CAA to determine continued compliance with the EASA Aircrew Regulation. Where an organisation ceases training activities it must inform the CAA without undue delay.
- 5.3 Should the organisation vary the scope of training offered (e.g. it wishes to offer Helicopter PPLs as well as those for Aeroplanes) it must also submit evidence that it is utilising an already verified training programme or it must submit the training programme for verification.
- 5.4 Where an organisation changes its name only but retains the same company number with Companies House, a copy of the Companies House certificate verifying the change must be submitted with a covering letter, a completed application form and the appropriate CAA administration charge.
- 5.5 The status of a Declared Training Organisation is NOT transferable. Therefore, if there is a change in the legal entity to the DTO, a new identifying number is issued by Companies House or the DTO transitions from sole trader status to that of a limited company, a new declaration application must be submitted.

- 5.6 In the above circumstances the previous declaration which has been signed by the CAA must be surrendered.
- 5.7 Changes to the aircraft fleet should be notified as part of the Annual Review process.

Chapter 6

Oversight by the Authority

Annual Review

DTO.GEN.270

- 6.1 The DTO is required to conduct an Annual Review of their activity and submit the results to their allocated Licensing Standards Inspector. The month when this must be submitted will be agreed during the initial declaration process.
- 6.2 The Annual Review is designed to cover two major elements – the DTO annual activity and the annual internal review. The details of each element are as follows:
- 6.3 The annual activity review must include, as a minimum, the following information for the previous calendar year:
- (i) All training courses and refresher training activity provided;
 - (ii) Names of all students, courses on which enrolled and their training status;
 - (iii) Names of all instructors (flying and theory) involved in the training offered by the DTO, the courses they teach and date of joining the DTO (if within the last 12 months);
 - (iv) Skill test and Theory Examination passes and failures in the last 12 months;
 - (v) List of training aircraft (and FSTDs if applicable) used by the DTO in the last 12 months;
 - (vi) List of all occurrences, accidents and incidents that occurred during training courses.
- 6.4 The annual internal review is designed for the DTO to evaluate the effectiveness of their safety policy, adequacy of the training offered and the

organisation's compliance with applicable regulations. It should include, as a minimum, the following information for the previous calendar year:

- (i) Availability of sufficient resources;
- (ii) Conduct of training in accordance with the requirements of Part FCL and Part DTO, with the DTOs training programme and with the DTOs safety policy;
- (iii) Random checks of training records and course completion certificates issued by the DTO;
- (iv) Assessments of the training programme(s) for its / their adequacy and being up to date;
- (v) Training aircraft including their documents and maintenance records;
- (vi) Aerodromes and operating sites, including associated facilities;
- (vii) Evaluation of both adequacy and effectiveness of the follow -up, corrective and (as applicable) remedial action taken after non-compliances that have been detected internally or that have been raised as a finding by the CAA;
- (viii) Assessment of the safety policy including its means and methods, as defined in AMC1 DTO.GEN.210, for its adequacy and being up to date;
- (ix) Assessment of the effective implementation of mitigating measures as foreseen in the safety policy.

A template for the Annual Activity Review is provided in Appendix D to this manual. This may be adopted by the DTO if desired.

- 6.5 If, during the Annual Review, the DTO finds that it has been non-compliant with the applicable regulations it must institute corrective action to resolve this issue and include details of the finding and actions taken as part of the report sent to the CAA.

CAA Oversight of DTOs

ARA.GEN.300, ARA.GEN.305, AMC1.ARA.GEN.305(f), AMC2 ARA.GEN.305(f)

Once a DTO has submitted and has received acknowledgement of its initial declaration it will be subject to continued oversight by the CAA. This oversight may

include audits and inspections, including unannounced inspections as appropriate, training sampling and meetings between the postholders and the competent authority to ensure both remain informed of significant issues.

6.6 Initial DTO Inspection

In all circumstances all organisations, including those that have previously held a current Certificate as a Registered Training Facility or newly established Training Providers should expect an oversight inspection at any time within five years of receipt of the declaration.

Wherever possible, the LSI will contact the DTO three months prior to the anticipated visit to agree a date and ensure that the nominated postholders will be available on the date agreed. Normally the inspection and other oversight visits would take place between Monday – Friday however, it is acknowledged that some DTOs may only operate at weekends and thus, with advanced agreement, it may be possible to make such visits on a Saturday or Sunday

6.7 Ongoing Oversight Cycle

The interval between oversight inspections (oversight planning cycle) is established by the CAA using risk-based criteria, including volume and range of activity, DTO size and complexity, the effectiveness of the DTOs management system and safety / occurrence reports.

The oversight planning cycle will not exceed six years, however, visits may take place at more frequent intervals, dependant upon the DTO's performance, to enable the Inspector to check the effectiveness of the DTO's organisational system and to observe training taking place.

Continuous oversight inspections follow a similar pattern to the initial inspection listed at paragraph 6.6. During such inspections, emphasis will be placed on the effectiveness of the DTO's safety system, including internal reviews, safety policy, hazard / risk identification and mitigation and activity to ensure compliance with applicable regulations; it is therefore essential that the nominated postholders are available.

6.8 Oversight Inspections

A DTO oversight inspection will focus on, but not be confined to, reviewing safety related items such as:

- (i) The existence of a safety policy and it's adequacy regarding the DTO's activities;
- (ii) The existence of appropriate measures to achieve the objectives of the safety policy, including risk identification, assessment and mitigation measures, results of annual reviews and respective corrective actions if applicable;
- (iii) Compliance with applicable regulations;
- (iv) Flight training in accordance with the DTOs stated training programme(s), its conduct and standards as well as training records;
- (v) Training aircraft in use, their associated documentation and maintenance records (if applicable);
- (vi) Use of FSTDs (if applicable),
- (vii) Operating sites and associated facilities;
- (viii) Information of flight instructors and the validity of their licences, certificates, ratings and logbooks.

6.9 Test and Examination Success-Rate Monitoring

Following initial declaration by a DTO, the CAA will monitor the results of tests and examinations offered by the organisation.

A DTO should also monitor their test and examination results and evaluate pass rates. The training effectiveness should form an integral part of the DTO Annual Review and remedial action taken should the rates drop below a defined level.

6.10 Sampling of Training

The allocated LSI will sample training at various stages of the oversight planning cycle. During inspections, DTOs can expect the Inspector to observe actual TK instruction and aircraft or simulated flight training, including pre-flight and post-flight briefings. The Inspector will aim not to

disrupt or distract from the training during any observation. Observation of training may also be carried out by CAA Flight Examiners on behalf of General Aviation Unit.

Training records of students and staff training and standardisation records will also be sampled during a DTO inspection, and must be made available to the Inspector.

6.11 Findings during oversight and corrective action

If, during oversight, evidence is found by the Inspector that indicates a non-compliance with the applicable requirements by a DTO the Inspector will:

- (i) 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 must take corrective action;
- (ii) If a safety problem has been identified the DTO shall take immediate and appropriate action to limit or to stop the training activity until successful corrective action is taken by the DTO;
- (iii) Where a DTO fails to take corrective action in accordance with the regulation, the CAA may suspend all or part of the DTO's activity until a satisfactory resolution is put in place (see Chapter 7).

Chapter 7

Revocation, Suspension or Variation / Limitation of a Declaration

- 7.1 Under ARA.GEN.350 the CAA can take immediate and appropriate action to prohibit (temporarily or on a permanent basis), limit or suspend activities of any organisation where that organisation has been in serious breach of the applicable regulations and no remedial / corrective action has been taken or proved effective.
- 7.2 Annual fees in respect of continuation of the validity of the Declaration will be payable throughout the full period of DTO suspension.
- 7.3 Where an organisation declaration has been revoked or surrendered, no further fees are payable; however, outstanding invoices will still be applicable.

Chapter 8

Further Guidance

Operations and Training Manual

- 8.1 In accordance with Part DTO there is no mandatory requirement for a DTO to use an Operations Manual, a Training Manual or an equivalent document such as a Flying Order Book, thus these are not a condition of the Declaration. However, the use of an Operations Manual or Flying Order Book is strongly recommended by the CAA as either document will allow the organisation to set out the procedures and policies it wishes to use to ensure safe operations.
- 8.2 Should the DTO wish to make use of an Operations / Training Manual the contents can be found in AMC1. ORA.ATO.230(a) and (b) or, alternatively, the CAA published a Template Manual for use by non-complex ATOs, which is downloadable from the CAA website. With minor amendment this may be used by the DTO.

Records

- 8.3 Content of student records

Commercially available Training Programmes frequently contain examples of training records. These are acceptable for use by a DTO. Where a DTO devises its own training programme and records, the format of the records should be included within the Programme itself.

Training records may be kept in paper or electronic format. All records kept must comply with the Data Protection Act.

As a guide the records should include:

- The personal details of each student, including name, address, telephone contact number(s), CAA reference number, next of kin, previous experience and evidence of all pre-entry requirements (for

example copies of licence/rating pages, theoretical knowledge exams passed, course completion certificates, copies of Skill Test form, medical certificates), and qualifications including a summary of any credit to which the student may be entitled and an assessment of his suitability to undertake the course;

- A cumulative record of theoretical knowledge lessons attended by subject together with an indication that the student has achieved proficiency in each subject and is recommended for the examination in each subject;
- Regular reports by subject with the instructor's name and written comments by the instructor on the student's performance and progress and other factors such as attitude and manner during individual lessons and during the course as a whole. Students should be invited to sign each report acknowledging its contents;
- Cumulative flying training achieved, and where applicable, synthetic flight training achieved;
- For each training flight or synthetic flight training detail, the date, the aircraft registration or FSTD identification, the flight time, the instructor's name in full, the syllabus exercise number and written comments by the instructor on the students performance, progress and other factors such as attitude and manner during the detail and during the course as a whole. The record should indicate the standard achieved in relation to the laid down performance standard and any deviations from the syllabus including incomplete items. Students are encouraged to sign each report acknowledging the debrief;
- A summary of flying exercises completed with the date on which each exercise was carried out in the air or in a FSTD;
- Relating to the student's progress, summary reports and the result of progress/phase tests, skill tests and theoretical knowledge examinations including arrangements for remedial training after failed tests/examinations;
- Training in aircraft emergency procedures, to be recorded separately and displayed prominently;

- All records shall indicate the date training commenced and the date of completion. Where students do not complete the course the record should indicate the circumstances under which training ceased. The students' overall performance and attitude to training should be summarised on completion or termination of the course;
- A medical certificate should be obtained before the commencement of flight training and must be obtained prior to solo flight training;
- Training records are to be made available to examiners prior to test in accordance with Part-FCL.030(b).

Transfer of Student Records

8.4 When a student, part way through a training course wishes to change training organisation from one DTO to another, in accordance with the Data Protection Act it is the student's responsibility to request the transfer of a copy of their records to the new DTO. These copies must be certified as correct by the originating training organisation and should be forwarded directly to the HT of the new DTO within 2 weeks of receipt of the request, and:

- The new DTO must have a copy of all relevant training records, or other acceptable information certifying the training and experience completed so far;
- Credit shall be given in full for all adequately documented solo, dual instruction or Pilot in Command (PIC) flight time completed as part of an approved course for the licence, rating or certificate;
- The HT of the new DTO shall assess the student and determine the balance of training and experience required to complete the course and any additional training necessary to cover the transition from the previous partly completed course;
- The applicant shall complete the balance of all training, examinations, flight time and shall complete any additional training necessary as specified in the determination by the HT of the new DTO.

Operational Publications

8.5 Required Publications

The following operational publications *should* be immediately available to students and staff and, where applicable, kept current by amendments:

- DTO Safety Policy and associated Hazard Logs, Safety Reports and documentation;
- The relevant Verified Training Programmes;
- CAP 393 - Air Navigation: The Order and the Regulations;
- EASA Part-FCL;
- EASA Part- DTO;
- UK Aeronautical Information Publication including Danger Area and Area of Intensive Aerial Activity (AIAA) Charts and Notam Class II supplements. (CD-Rom versions of the AIP will be acceptable or icon on a computer provided that it can be shown that students have unrestricted and immediate access to them);
- Aeronautical Information Circulars (again, these may be accessed 'online');
- Flight Manuals for the aircraft used on the course(s);
- Standard meteorology reports and forecasts (in document or computer based formats) and NOTAMs;
- CAA Information Notices, CAPS and Standards Documents 11, 14(A), 14(H), 19(A) and 19(H).

8.6 Other Publications

The following additional publications should be immediately available to students and staff and, where applicable, kept current by amendments:

- DTO Operations and Training Manuals (if applicable);
- Other Standards Documents;
www.caa.co.uk/fclstandards

Appendix A

Guidance: Legal Entity of the Applicant Organisation

Introduction

The CAA routinely receives applications for legal documents (e.g. Certificates, Licences, Permissions, Approvals, and Exemptions). Before granting issue of these documents, it is important that the legal status of the applicant is established and the correct name of the entity is used. The CAA will only provide such documents to legal entities once these have been fully established or clarified. The CAA wishes to ensure that all parties are protected, whether these are the applicant organisation, the students it trains or the CAA itself in both legal matters and business matters.

Definition of a 'Legal Entity'

Legal entities take one of two forms:

- A natural person, or
- A body corporate

Natural Persons

A natural person is an individual such as 'John Smith'. All natural persons have rights and duties under the law and can be held accountable in the Courts. Natural persons are able to hold various legal documents granted by the CAA. In some instances, the CAA may ask for corroborating identification, such as a passport or birth certificate, before granting a document to a natural person. Natural persons in business are sometimes referred to as 'sole traders'.

Natural Persons and Trading Names

Natural persons may adopt one or more trading names under which to conduct business, e.g. Smith Aviation. The application form should, for example, show John Smith as the Applicant and Smith Aviation as the Trading Name.

Partnerships

Several individuals may join together to form a partnership under the Partnership Act 1890. A partnership is a relationship which exists between persons in business together with a view of profit. The partnership may adopt a name, e.g. the John Smith Partnership.

In Scotland, under the Partnership Act, a partnership has its own distinct personality, and unless it is a Limited Liability Partnership (LLP) which is a form of incorporated partnership, a partnership has no legal identity of its own and must be treated as a trading name.

All documents granted to a partnership should therefore show all the names of the individual partners, e.g. John Smith, Jane Smith, David Brown and Dianne Brown trading as the John Smith Partnership.

Clubs

Distinct from a partnership, several individuals may also join together to form a club as an unincorporated association through their agreeing to abide by common rules and members may leave and join the club via the same way. An unincorporated club has no distinct legal identity and club property is generally held by trustees on behalf of the club members, sometimes the chairman and club secretary.

Where a certificate or other document is to be issued to an unincorporated club, it will be necessary to determine in whose names the certificate is to be held in accordance with the club's rules.

If the club is incorporated, as for example if it is a limited liability company, the document will be issued in the name of that company.

Bodies Corporate – Great Britain

There are many different forms of GB body corporate, but the most common are:

- Limited Liability Companies,
- Companies limited by guarantee; and
- Limited Liability Partnerships.

Whatever form it takes, every body corporate will be able to produce documentary evidence of its incorporation, usually an official copy of the certificate of registration issued by the Companies Registrar.

GB Limited Companies

In Great Britain, companies can either be private limited companies (e.g. Smith Aviation Ltd), public limited companies (e.g. Smith Aviation PLC) or companies that are limited by guarantee. In all cases they will have been registered at Companies House.

Documents granted must show the complete and accurate name of the company, including punctuation such as spaces, full stops and brackets, (e.g. Smith Aviation (2001) Ltd). Apart from the use of Ltd (which is short form for Limited) and Plc (which is short form for public limited company) no abbreviations should be used unless they are actually used within the company's name. Any application forms should therefore have the legally accurate name of the company, including spaces, punctuation etc. as registered with Companies House.

Each company additionally has a unique registration number that is allotted to it on its incorporation and which cannot be changed or transferred, even when a company changes its name. This number should be entered on any application form where requested by UK CAA.

GB Limited Liability Partnerships (LLP)

LLPs will have been registered at Companies House and should be treated in the same way as limited companies.

Non-GB Limited Companies

Companies based outside Great Britain will have been subject to a registration process in the country of registration. This process will have resulted in the generation of documentary evidence, such as Certificates of Incorporation. CAA policy requires sight of copies of such evidence before granting documents to non-GB limited companies (**note:** If the certificates etc. are in a foreign language these will be required to be submitted in the original language along with a translated version submitted).

Bodies Corporate and Trading Names

Bodies corporate may, like natural persons, adopt trading names. For guidance, see **'Trading Names'** section below.

Trading Names

Natural persons and bodies corporate may adopt one or more trading names. The trading name is not the name of the legal entity – indeed, several different legal entities could, in theory, adopt the same trading name. The CAA will issue all documents in the legal name of the Body Corporate or Natural Person.

Where the applicant has informed the CAA that they wish to adopt a trading name, e.g. on the application form, this will be shown on the document in addition to, but not instead of, the legal name, e.g. John Smith trading as Smith Aviation, or Smith Aviation Ltd trading as Smithair.

However, there are two circumstances in which CAA may wish to query or refuse a request:

- Firstly, where the trading name does not seem to be properly reflected in the documentation produced by the company. The organisation will need to make clear that there is no confusion in-house as to what procedures, manuals or other forms and records they should be utilising. There must be consistency in the way the organisation is

described in its own documentation and material. The CAA will query the position with the applicant where this is not the case.

- Secondly, and of less importance – because the CAA is not responsible for regulating the use of trading names – where the trading name seems potentially confusing the CAA may query it with the applicant, e.g. Bloggs Air Limited trading as British Airways.

Legal Entity Identification

In order to regulate effectively, the CAA needs to be clear about the identity of the organisations with which it is dealing. The CAA will therefore insist that all correspondence, manuals and other documents submitted in support of applications, or in the course of routine regulatory oversight, clearly identify the appropriate legal entity.

It should be noted that whilst a company can change its name one or more times over its lifetime and that two different companies can have the same name albeit not at the same time (this is not uncommon in group reorganisations and in company liquidations where the liquidators of the company may sell the name to another company, sometimes to its former management) each company has a unique registration number that is allotted to it on its incorporation and which cannot be changed or transferred. It is therefore recommended that an incorporated company has this number included in its documentation and correspondence.

Changes to the Organisation (Change of name, Re-organisation etc)

Any application to amend an organisation certificate should be submitted at least 30 days before the date of intended changes. Unforeseen changes should be notified at the earliest possible opportunity, in order to enable the CAA to determine continued compliance with the EASA Aircrew Regulation.

Change of Name only

Where an organisation changes its name but retains the same company number with Companies House only, a copy of the Companies House certificate verifying the change should be submitted with a covering letter, a completed application form and the appropriate CAA administration charge. Amendment pages will additionally need to be issued for the company's approved manuals held by CAA. Subject to all submissions being satisfactory, the DTO approval certificate will be re-issued in the new company name.

Re-organisations, Mergers etc

An approval once issued is NOT transferable. A new application must be made for a new approval to be issued if there is going to be a substantial change in the organisation's circumstances, for example, where a DTO changes its name and ownership or enters into an arrangement to 'move / merge' an approval to/with another DTO.

Approvals Support should be notified at the earliest possible opportunity if such a change is going to take place, in order that advice can be given on what needs to be done to facilitate the issue of a new approval as expeditiously as possible.

Appendix B

Severity / Likelihood Definitions

Severity of Consequences		
Definition	Meaning	Value
Fatal Accident	Results in a serious accident or incident with fatalities	5
Serious Incident	Results in a serious incident (without fatalities) that would be reportable to the competent authority	3
Negligible	Results in a minor incident that would not be reportable to the competent authority	1

Likelihood of Occurance		
Qualitative Definition	Meaning	Value
Likely	Likely to reoccur or to occur several times	3
Possible	Possibly reoccur or to occur at least once a year	2
Unlikely	Very unlikely to reoccur or occur	1

Proposed risk acceptability matrix:

		Likelihood		
		Unlikely (1)	Possible (2)	Likely (3)
Severity	Fatal Accident (5)	REVIEW (5)	UNACCEPTABLE (10)	UNACCEPTABLE (15)
	Serious Incident (3)	REVIEW (3)	REVIEW (6)	UNACCEPTABLE (9)
	Negligible (1)	ACCEPTABLE (1)	ACCEPTABLE (2)	REVIEW (3)

Proposed Risk acceptance actions: 1

The following table will determine the appropriate action to be taken:

Unacceptable	Risk Intolerable, Accountable Manager immediately informed and action must be taken to reduce the risk to a tolerable level.
Review – Act	Risk mitigation action must be considered. Where risk mitigation is not practical or viable acceptance by Accountable Manager is required.
Acceptable	Risk is considered acceptable but would be reviewed if reoccurs.

Appendix C

Example of a Risk Register / Hazard Log

Risk Title	Description	Effect	Unmitigated risk severity	Unmitigated risk likelihood	Initial risk classification	Mitigation controls	Post mitigation risk severity	Post mitigation risk likelihood	Post mitigation risk classification	Further actions	Last review date	Next review date
Mid Air Collision	The aircraft collides with another aircraft in flight	The aircraft is rendered uncontrollable which is followed by and uncontrolled landing. All occupants seriously injured or killed	Catastrophic 5	Remote 3		Good threat and error management installed in all pilots requires that a good lookout is maintained. All pilots conform to known traffic patterns	Catastrophic 5	Very improbable 1				
CFIT	The aircraft is flown into terrain whilst the pilot is in control	All occupants are killed or seriously injured	Catastrophic 5	Improbable 2		All pilots are to be aware of the reqs to maintain a safe	Catastrophic 5	Very improbable 1				

						distance from terrain IAW the ANO						
Prop Strike	A spinning propeller strikes the ground, a vehicle or object	Damage to propeller, engine of airframe and possibl ehird party property	Remote 3	Remote 3		Pilots to maintain a sound lookout to avoid all obstacles on aerodrome	Improbable 1	Remote 3				

Appendix D

DTO Annual Activity Review Report

Company Name	Reference
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Training activity

Number of Students currently under training / completed training in previous 12 months

<u>LAPL(A)</u>	/	<u>LAPL(H)</u>	/
<u>PPL(A)</u>	/	<u>PPL(H)</u>	/
<u>LAPL(S)</u>	/	<u>LAPL(B)</u>	/
<u>SPL</u>	/	<u>BPL</u>	/
<u>Night</u>	/	<u>Aerobatics</u>	/
<u>Type Ratings (H)</u>	/	<u>Class Ratings (A)</u>	/
<u>TMG</u>	/	<u>Class extn (B)</u>	/
<u>Towing Rating</u>	/	<u>Group Extn (B)</u>	/
<u>Cloud Flying (S)</u>	/	<u>Tether</u>	/
<u>FI (S)</u>	/	<u>FI (B)</u>	/
<u>FE (S)</u>	/	<u>FE (B)</u>	/

Number of Skill test in last 12 months	
Number of Skill tests passed in last 12 months	
Number of Skill test failures in last 12 months	

<p>Number of Theory Exam failures in last 12 months</p>	<u>Air Law.....</u>
	<u>HP.....</u>
	<u>Met.....</u>
	<u>Comms.....</u>
	<u>Nav.....</u>
	<u>Op Proc.....</u>
	<u>FP&P.....</u>
	<u>Aircraft Gen.....</u>
<u>PoF.....</u>	

Has any new training equipment or training methods been introduced over the last 12 months ? If so, how effective have they been?

Training Resources

Instructional Staff

Name	FT/PT	Name	FT/PT

Please indicate with * if the instructor has joined the company in the preceding 12 months

Aircraft Fleet

Type	Reg	Hours flown in previous 12 months	Current?

Safety Performance

Number of occurrences, accidents and incidents in the last 12 months

Instructor in command.....

Student Pilot in command.....

Self fly hire in command.....

Analysis of these events

Description of event	Cause	Mitigation put in place	Has mitigation proved effective?