

General Aviation Pilot Licensing Review Phase 2: Helicopters

Consultation Response Document

CAP3032E



Contents

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Executive Summary

This paper sets out the findings from the consultation on the second phase of the Licensing and training simplification project – Helicopters, and sets out key decisions to proceed with in the next phase of the project.

The consultation ran between 13 March 2024 and 22 May 2024 and elicited 37 unique formal responses.

Overall direction

- Create a single ICAO compliant PPL.
- Create a single sub-ICAO licence.
- Explore changes to theoretical knowledge exams including the number of exams and the validity periods.
- Options for flight instructor prerequisites.

Next steps:

- We will begin work on drafting the proposed amendments to Part-FCL and the ANO.

Chapter 1

Purpose and background

Purpose of this document

- 1.1 We published [CAP 2974E](#) from 13 March 2024 to 22 May 2024 to publicly consult on the second phase of the GA Pilot Licensing and Training Simplification project with respect to changes for Helicopters.
- 1.2 We received a total of 37 responses to this consultation. Most respondents answered the survey questions and a small number left additional comments. The consultation questions were worded in such a way to form a survey that could be quantitatively analysed.
- 1.3 The results of this consultation set out the direction for the next phase of this project and the changes that will be implemented. At several points in this Consultation Response Document (CRD), we set out specific decisions arising from the consultation regarding proceeding with the next phase of this project.

Background

- 1.4 The CAA continued throughout 2023 with the project to simplify General Aviation (GA) flight crew licensing and training. [CAP 2974E](#) consulted on the detailed proposals for helicopters. Similar consultations were also undertaken for aeroplanes, balloons and airships, sailplanes, and gyroplanes.
- 1.5 This work followed an earlier consultation [CAP 2335](#) in Autumn 2022. The 1,246 GA community responses¹ (summarised in [CAP 2532](#)) showed strong support in several key areas for updating our current legislation with regards to licensing and training.
- 1.6 This second consultation explored these areas in more detail, ensuring that we achieve the aims of the project and community, whilst maintaining safety and ICAO compliance where appropriate. It reflects work the CAA has undertaken since the first consultation, in collaboration with a working group of GA community experts.
- 1.7 In keeping with our collaborative approach towards policy development and rulemaking, we reconvened the working group that assisted with the first phase of the project, enlarged its membership, and split by aircraft category to provide a

¹ See [Consultation Response Document CAP2532](#) which set out its detailed findings. For more information on this project, see our dedicated project microsite on the CAA website: <https://www.caa.co.uk/general-aviation/pilot-licences/licensing-training-simplification/>

focused analysis: aeroplanes, sailplanes, balloons and airships, helicopters, and gyroplanes.

Scope

- 1.8 This consultation proposes changes to private pilot licences and associated ratings and certificates to act as pilot in command of helicopters as defined by UK Part-FCL and Schedule 1 of the Air Navigation Order 2016 (ANO) as ‘means a heavier-than-air aircraft supported in flight chiefly by the reactions of the air on one or more power-driven rotors on substantially vertical axes.
- 1.9 This project will not cover the following areas:
- Commercial operations other than private pilot instruction. Pilot licences allowing commercial operations in aeroplanes or helicopters, including public transport and commercial air transport, as well as integrated flight training with the express purpose of training from no previous experience to air transport licences are all outside the scope of this project.
 - Private operations in complex aeroplanes and helicopters. Although operations in, for example, corporate aviation are technically part of the international general aviation definition, the specific characteristics and needs of the markets in which those aircraft operate mean that we regulate them separately.
 - Ratings and rating exemptions for historic/ex-military aircraft, as well as display pilot qualifications.
 - Unregulated activities to operate non-Part-21 gliders such as unregulated sailplanes and Self-Propelled Hang Gliders (also known as ‘paramotors’ or ‘powered paragliders’).
 - Finally, Medical Certification and the Pilot Medical Declaration, although linked to licensing are not considered in this review.
- 1.10 Note it is unlikely that the assimilated EU law (previously known as retained EU law) and the Air Navigation Order 2016 (ANO 2016) will be consolidated during the timeline of this project. Whilst we will endeavour to remove inconsistencies between the two legal frameworks, Part 21 aircraft will remain regulated under the assimilated EU law and non-Part 21 aircraft under the ANO 2016.

Considerations

- 1.11 We have not been able to change the definition of Part 21 and non-Part 21 aircraft, as defined in the UK Basic Regulation.
- 1.12 We are not proposing any changes to Part 21 Operational Suitability Data (OSD) or previously published Operational Evaluation Boards (OEB) with respects to identified training requirements for flight crew when operating a specific aircraft.

Chapter 2

ICAO PPL(H)

We asked

- 2.1 After describing the nature of our project, we wanted to ascertain the views of the public regarding the changes and improvements that we would like to implement.
- 2.2 Consolidation between the Air Navigation Order 2016 and the assimilated EU law is unlikely to take place within the timeline of this project, so we have developed the concept of a combined Part-FCL and ANO licence document.
- 2.3 The combined licence document would be based on the Part-FCL format, but with a section issued under the ANO, which would allow the endorsement of non-Part 21 type ratings. If possible, we could therefore discontinue the issue of the UK PPL(H) under ANO 2016 as a standalone licence document.
- 2.4 Existing ANO licence holders would be unaffected; we are not proposing to remove the licence for existing holders. Holders of UK licences may apply for a Part-FCL equivalent, subject to having a current rating and medical – on application we would issue a licence in the new combined format.

You said

- 2.5 **Question: Do you agree with our proposal to discontinue issuing new UK PPL licences under the Air Navigation Order?** (37 respondents expressed a view)
- 2.6 Respondents indicated strong support for this proposal with 59% agreeing that we should cease issuing PPLs issued under the ANO.
- 2.7 Only 11% disagreed with this proposal with the rest of the respondents selecting either undecided or no view/don't know.

Option	Total	Percent
Yes	22	59.46%
No	4	10.81%
Familiar with the issues but am undecided either way	5	13.51%
No view/don't know	6	16.22%
Not answered	0	0.00%

We did

- 2.8 Whilst the response to the consultation was low, we have taken into account their views and comments in line with the general direction of the project as a whole.
- 2.9 An important part of this project is to, where possible, simplify the licensing structure and this decision will assist in the endeavour.

Phase 2 Consultation Outcome – CAA Decision no.1

We will progress a combined licence document format for the ICAO compliant PPL(H)

Chapter 3

Sub-ICAO Helicopter licence

We asked

- 3.1 To create a single sub-ICAO licence, we would use the same combined licence document concept as described in Chapter 2. This would likely mean ceasing to issue the NPPL(H) as a standalone licence, and when required, issuing a sub-ICAO licence under Part-FCL, but with a section for non-Part 21 type ratings.
- 3.2 Existing holders of the LAPL(H) and NPPL(H) would be able to continue to exercise the privileges of the licence they hold.
- 3.3 The existing LAPL(H) syllabus is very similar to that of the PPL(H). The theoretical knowledge requirements are also the same. Whilst we are committed to retaining a sub-ICAO helicopter licence, it may not make sense to retain two very similar syllabi.
- 3.4 Since introduction in 2012, the CAA has issued a very small number of LAPL(H), and feedback suggests course completion times are similar to that of the PPL(H).
- 3.5 An alternative approach would be to only use the PPL(H) syllabus but issue a LAPL(H) if the applicant complies with the LAPL(H) flight training and supervised solo requirements and holds a valid LAPL Medical Certificate.

You said

- 3.6 **Question: Do you agree with our proposal to issue a combined licence document for the sub-ICAO licence?** (37 respondents expressed a view)
- 3.7 The respondents indicated strong support for issuing a combined licence for the sub-ICAO licence with 70% agreeing with this approach.
- 3.8 Of the respondents, 14% disagreed with this proposal. The rest of the respondents were either undecided or selected no view/don't know.

Option	Total	Percent
Yes	26	70.27%
No	5	13.51%
Undecided	5	13.51%
No view/don't know	1	2.70%
Not answered	0	0.00%

- 3.9 **Question: Do you believe the sub-ICAO helicopter licence should have the same or a different syllabus from the PPL(H)?** (37 respondents expressed a view)
- 3.10 73% of respondents felt the syllabus for the sub-ICAO licence should be the same as the PPL(H).
- 3.11 19% felt that there should be a separate syllabus for the sub-ICAO licence.
- 3.12 All other respondents selected undecided or no view/don't know.

Option	Total	Percent
Same as the PPL(H)	27	72.97%
Separate sub-ICAO syllabus	7	18.92%
Undecided	2	5.41%
No view/don't know	1	2.70%
Not answered	0	0.00%

Comments left by respondents

- 3.13 “Basically the same but agree with the present arrangement whereby LAPL(H) candidates do not have to complete Leg 4 (Radio Navigation) of the Skill Test.”
- 3.14 “Would make the syllabus easier for the DTOs and ATOs”
- 3.15 “Syllabus needs more emphasis on flying actual confined area operations.”
- 3.16 “I think, especially with the different nature of helicopters and how they operate, that it doesn't really make sense to offer anything 'less than' a PPL(H), but the proposed sub-ICAO helicopter licence makes sense as an opportunity to offer continued flying to those who can't pass a Class II medical - with suitable restrictions applied.”

We did

- 3.17 Based on these responses, we have taken the following decisions:

Phase 2 Consultation Outcome – CAA Decision no.2

Cease issuing new NPPL(H) licences and move to a combined non-ICAO compliant licence document. The non-ICAO compliant combined licence will be the LAPL(H).

Phase 2 Consultation Outcome – CAA Decision no.3

Adopt the Part-FCL PPL(H) syllabus for the new combined non-ICAO compliant licence document, LAPL(H).

Chapter 4

Theoretical knowledge

We asked

Number of exams

- 4.1 Currently there are nine separate exams for the PPL(H), one for each subject identified in ICAO Annex 1 and FCL.215. These exams consist of five common papers and four that are specific to the aircraft category.
- 4.2 It is not mandated in regulation that each subject has a separate exam, and some EASA states combine subjects. The working group identified arguments for both approaches.
- 4.3 Some members advocated that having a higher number of specific exams made revision easier and that candidates can already combine exams if they so wished. Having multiple exams may also support the parallel integration of theoretical knowledge and flight training.
- 4.4 Others in the group believed that multiple exams made the theoretical knowledge course seem more onerous and that reduced exams would provide more motivation for candidates.
- 4.5 We propose to keep the overall number of exam questions for the Part-FCL PPL(H) to 120, as per the existing Acceptable Means of Compliance (AMC) material for the PPL. However, we are open minded as to the number of individual papers the questions should be distributed within.
- 4.6 The working group identified options that included reducing the number of exams to either seven or two. With seven exams, Air Law would be merged with Operational Procedures and elements of Flight Performance and Planning would be merged with Navigation and Aircraft General Knowledge.
- 4.7 In the case of two exams, all the aircraft category specific subjects would be merged into one paper and the common subjects into another.
- 4.8 We appreciate that this may end the widespread practice of training organisations requiring student pilots to pass the Air Law examination before their first solo flight, and the Navigation, Flight Performance and Planning examinations before their first solo cross-country flight.

Use of flight planning tools

- 4.9 Many licence holders take advantage of mobile devices for help with navigation and flight planning. The use of these mobile devices with associated flight planning

and monitoring software, for example a tablet device and SkyDemon, has been a major development and are central to the efforts in reducing airspace infringements. These systems can also be used with different electronic conspicuity devices to help with spotting other aircraft and mitigate against the risk of loss of separation or mid-air collision.

- 4.10 The syllabus currently being used supports the traditional navigation principles of deduced reckoning and map reading. Flight planning and track monitoring is calculated by using an analogue flight computer, for example Pooleys CRP 1.
- 4.11 We believe there are benefits for student pilots learning to use such flight planning software as part of the course. Not to replace the basic principles of navigation and flight planning but to improve the use of these systems and to gain improvements in pilots' airspace and situational awareness.
- 4.12 We proposed encouraging the use of these devices as part of the theoretical knowledge training. We are not proposing, at this time, to allow these systems to be used in the examinations for Navigation and Flight Planning and Performance.

Validity periods

- 4.13 We proposed extending certain validity periods, which we had to balance with concerns about skill and knowledge fade, if we were to remove the validity periods completely.
- 4.14 We are considering changing the 18-month period within which all examinations must be passed for the issue of the licence, to a rolling validity period. This means if an examination goes outside of the 18-month period, the candidate does not have to retake all the examinations again – only the examinations that have fallen outside of the 18-month period.
- 4.15 We are also considering amending the validity period for successfully passed theoretical knowledge examinations to give applicants more time to apply for a licence. We proposed that the validity period to be extended from 24 months to 36 months.
- 4.16 With the data we are now collecting in the eExam system, we have seen a slight increase in the number of candidates who have failed to pass an examination within four attempts.
- 4.17 If an examination candidate fails to pass an examination within four attempts, they forfeit any examination passes they have already and have to start again, after a period of theoretical knowledge training.
- 4.18 Many of these student pilots have not continued with their training for a pilot's licence.

4.19 We would like to better understand why these student pilots are ceasing their training and if the requirement to retake all of the examinations again was a factor in them stopping their course.

4.20 We would also like to see what alternative options there are to requiring all of the examinations to be retaken.

You said

4.21 **Question: Which approach would you support to the theoretical exams?** (36 respondents expressed a view)

4.22 There was fairly even support for combining the exams into seven exams and keeping the existing requirements with 41% and 38% selecting these options respectively.

4.23 There was low support for the proposal to combine the exams into two.

4.24 No respondents selected the undecided or no view/don't know option.

Option	Total	Percent
Combine exams into seven	15	40.54%
Combine exams into two	7	18.92%
No change to existing requirements	14	37.84%
Undecided	0	0.00%
No view/don't know	0	0.00%
Not answered	1	2.70%

Comments left by respondents

4.25 “I think we could easily combine the exams into somewhat fewer - for example the paper on Human Performance is very straightforward and requires relatively limited study / has (hopefully) a high common sense component. Recognising that PPLs tend to do this work in their spare time, combining into two would be unhelpful - it's good to be able to take a few at a time, over a longer period.”

4.26 “The proposed combination for seven exams might confuse students as to the boundaries between topics, e.g. what is 'law' and what is 'operational procedure'. This would not be a good thing. Combining to two almost makes more sense, but I suspect many students would find the 'common topics' exam rather onerous. That said, it might provide better evidence of the student retaining their learning.”

4.27 “Combine similar topics to make it easier to understand what areas are valid to which exams.”

4.28 “I believe they should be combined either to 7 or kept as is, but certainly do not suggest reducing to 2 exams. My concern is that such a concentrated exam would mean students end up attempting to learn the answers, due to the range of topics to cover, rather than slowly assimilating information, subject by subject, which leads to a broader knowledge base in aviation.”

4.29 “The present structure allows a student to complete areas of TK study pertinent to the syllabus of flying instruction e.g. Air Law and Navigation & Flight Planning before flying the exercises as described in para 4.8 of the consultation document which represents best practice (i.e. Air Law exam before First Solo and Nav before Exercise 25.”

4.30 **Question: Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software in the Navigation and Flight Performance and Planning training?** (37 respondents expressed a view)

4.31 We received overwhelming support for the proposal to encourage the use of mobile devices with flight planning and monitoring software in the navigation and flight performance and planning training, with 97% agreeing with this proposal.

Option	Total	Percent
Yes	36	97.30%
No	1	2.70%
Undecided	0	0.00%
No view/don't know	0	0.00%
Not answered	0	0.00%

4.32 **Question: Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software during the Navigation exercises?** (37 respondents expressed a view)

4.33 Further strong support received for the proposal to encourage mobile devices with flight planning and monitoring software during Navigation exercises, with 92% supporting this proposal.

4.34 8% of respondents disagreed with this approach.

Option	Total	Percent
Yes	34	91.89%
No	3	8.11%
Undecided	0	0.00%

No view/don't know	0	0.00%
Not answered	0	0.00%

4.35 **Question: Do you agree with amending the validity period of the examinations to change the 18-month period in which all examinations must be passed within a certain period to a rolling validity period?** (37 respondents expressed a view)

4.36 73% of respondents showed support for the proposal to amend the validity period of the examinations from 18 months to a rolling validity.

4.37 24% disagreed with this approach and 3% were undecided.

Option	Total	Percent
Yes	27	72.97%
No	9	24.32%
Undecided	1	2.70%
No view/don't know	0	0.00%
Not answered	0	0.00%

4.38 **Question: Do you agree that we should amend the validity period of theoretical knowledge examinations from the current 24 months to 36 months?** (37 respondents expressed a view)

4.39 62% of respondents supported the proposal to amend the validity period for theoretical knowledge examinations from the current 24 months to 36 months.

4.40 35% disagreed with this proposal. 3% were undecided.

Option	Total	Percentage
Yes	23	62.16%
No	13	35.14%
Undecided	1	2.70%
No view/don't know	0	0.00%
Not answered	0	0.00%

4.41 **Question: If a student fails any one exam four times, is the requirement to retake all of the examinations again a factor in a student pilot stopping their course?** (37 respondents expressed a view)

4.42 73% of respondents said that they felt the requirement to retake all examinations again if a pilot fails any exam four times, was a factor in a student pilot stopping the course.

4.43 8% did not agree with this statement.

4.44 19% of respondents were undecided or had no view/didn't know.

Option	Total	Percent
Yes	27	72.97%
No	3	8.11%
Undecided	3	8.11%
No view/don't know	4	10.81%
Not answered	0	0.00%

4.45 We sought respondent's views on how we could replace this requirement. 19 individuals provided comments. Below are some of those suggestions.

4.46 The most common suggestion was to implement mandatory additional ground school, with an instructor, in the subject the student was failing prior to being able to retake the exam for that particular subject, rather than having to re-sit all exams.

Comments from respondents

4.47 "You could stipulate that if someone fails four times, they must undertake a 25-hour TK course on that specific topic with an instructor. Once complete they can resit that exam again as opposed to all exams. If that doesn't end in a pass, they can do another mandated 25 hour course and repeat until they pass the exam. While this does mean there is an endless amount of attempts, if the candidate is receiving 25 hours of TK between attempts, after 4 attempts, then you would hope the candidate is gaining additional knowledge each time they did this."

4.48 "Require specific ground training with a qualified instructor to take place which a minimum amount of hour/subjects covered and requiring the instructor to sign the student off to take the exam again."

4.49 "The individual must sit a period of trg with a recognised theoretical provider and not self study to realise why they are failing a particular subject. To loose all the other exams is not fair."

4.50 "Suggest that the requirement stays, but after 2 failed attempts the student must do some ground school."

4.51 "Require extra training in the failed subject after 4 attempts, and provide the instructor with the failed questions and answers".

We did

- 4.52 Our preference would be to reduce the number of examinations to seven and with strong support received for the other proposals, we will look to proceed with amending the existing requirements.
- 4.53 With respect to the suggestions received regarding having to retake all examinations after failing an exam within four attempts, we will investigate this further and develop proposals for any changes.
- 4.54 However, we need to further assess the cost of making the associated changes with our third party eExams supplier. We hope to make a decision in this area towards the end of 2024.

Chapter 5

Other issues

Flight Instructor theoretical knowledge

We asked

- 5.1 Applicants for a Flight Instructor (FI) Certificate who wish to teach for the PPL(H) are required to hold a CPL or have passed the CPL theoretical knowledge examinations. This is an ICAO Annex 1 requirement which we will maintain.
- 5.2 The FI course also includes theoretical knowledge instruction covering teaching and learning techniques, understanding of the syllabus and aviation technical knowledge.
- 5.3 Concerns have been raised to the CAA about the competence, depth of and application of appropriate theoretical knowledge by some flight instructors. We are considering a review of the prerequisite theoretical knowledge and the course teaching and learning and theoretical knowledge instruction requirements for the FI.
- 5.4 We need to ensure that the prerequisite and course training requirements prepare an FI to be competent and to be able to deliver quality flight and theoretical knowledge training to student pilots.

You said

- 5.5 We received 19 individual responses to this request. Below are some of the suggestions we received.
- 5.6 “Although I completed my training in 2010, some of requirements' from a theoretical perspective can be a little archaic, It was also be useful if there were a standardisation requirement for training aids/text books that are independently produced, sometimes the information can be confusing, or bear no relation to the actual examination questions.”
- 5.7 “All FIs should be required to teach from a suitable bank of information/notes and to make these available to the student, recognising that self-study is the main route to success, but also that they will be helpful in some of the more challenging areas.”
- 5.8 “Maybe come up with a whole specific FI knowledge route where ATPL knowledge can be credited towards the course as to not disadvantage either side. There are a lot of things within the ATPL exams that are not relevant to teaching a PPL. Maybe have a stepped FI route? So basic FI can only teach DAY VFR ppl. Then have add

on for night ratings, CPL, and IR. All of which have their own knowledge requirements... ie to teach IR or CPL you need the ATPL exams.”

- 5.9 "I think the course for an FI is well structured and the examiners are firm but fair, they should be trusted at the end of the course to make an assessment as to the FI candidates aptitude and recommend re-training as required. During my 20 years in aviation I have spoken to a lot of FIs who all say the same thing about the course, 'it is the hardest course they have done'. These are pilots who have passed CPL, IR and even 747 type ratings, but they still find the FIC tough. This speaks volumes that the course is a well structured one.

I personally believe that as opposed to changing the pre-requisites that the post requirements should change. For example, when an FI candidate is assessed during an AOC they are assessed to a very high standard where not much allowance is made for the fact that they are a new FI. Once passed they are restricted until they have 100 hours and 25 solo sign offs. I believe the 25 solo sign offs should be removed and during the 100 hour restricted process the below assessment takes place, reviewed by a head of training. Mandate every 25 hours of the 100 restriction a head of training or unrestricted FI observes a briefing. For the same sortie the HoT or FI sits in the back of the aircraft and observes the instructional techniques, I appreciate this isn't practical in two seat aircraft but a recording could be made of the flight the HoT reviews.

This then gets debriefed and recorded in some sort of note system. You could also stipulate that the restricted candidate has seen say 5 solo sign offs so they understand the process.

After this 100 hours has been completed a HoT would recommend to the CAA that this candidate has their restriction removed. This would help in two areas, it would keep oversight of the new FI who is now teaching in the real world, very different to the simulated world during an FIC, it would also provide great opportunity for standardisation during this evaluation process which is going to bring up the overall standard of teaching."

- 5.10 "I believe that FI candidates should attend a seminar before starting the course similar to that delivered by the BGA and conceptually similar to what the military does with DTTT."
- 5.11 "An approved book/study list would be useful for both FI and student."
- 5.12 "As an FE/FI(A) but with extensive military helicopter experience, and as a prospective FI(H) I have been studying the current UK landscape for FI(H) courses. I have been very surprised at the lack of helicopter instructor courses, the variance in cost and number of instructors qualified to teach instructors. Given how well run the FI(A) courses are, I'm puzzled to understand this. Insights I have gained are that schools have not felt the CAA has provided any consistency in the AOC's for new FI(H), which is completely at odds with the fixed wing world.

The answer is the same as the fixed wing course, a syllabus that is followed completely, then with very clear guidance on the content of the AOC, and then ensuring that those who undertake the AOC are standardised to make sure they stick to the script. Clearly this has not been happening and the schools have been trying to second guess how the very few examiners that do AOCs will behave on the day. This means that the FI(H) course lacks consistency and leaves students uncertain about how they will be assessed. Again, completely at odds with the way that FI(A) course and AOCs are conducted."

- 5.13 "Part FCL lays down a detailed syllabus for Teaching and Learning together with the list of ground subjects to be taught. It is comprehensive and there is unlikely to be time during an FI(H) course to cover each subject in sufficient detail and, crucially, give the candidate instructors time to practise delivering all the associated ground lessons in the TK syllabus.

After graduating as a flying instructor, it should be realised that in many ATOs/DTOs scant time will be available for formal TK instruction before a flight and PPL candidates are often left to self-study the textbooks or online courses that they have been recommended. With this unstructured approach to instruction pervading the Industry, it is hardly surprising that TK standards are low. Bear in mind that this is how the candidate flying instructor is likely to have been taught unless they are ex-military so a recognisable pedagogical standard is absent from the outset. It's not clear what can be done about this other than more oversight being given to ATOs that deliver FIC and possibly discussion of this issue at FI refresher seminars."

- 5.14 "Perhaps allowing non-profit instruction, as a rating on PPL"

We did

- 5.15 We appreciate all comments and suggestions received to this question. We will take them into consideration and will discuss further with the helicopter Subject Matter Experts (SME's).
- 5.16 Due to the complexity surrounding this subject, it is unlikely that any changes will be made during the timeline of this project.
- 5.17 We will look to take these discussions further once this project is complete.

Other comments

We asked

- 5.18 Finally, we wanted to gauge if there were any other issues regarding helicopter licencing that we had not already mentioned in the consultation.

You said

5.19 We received 21 responses to this question. Below are some of the comments that were presented.

5.20 “This may be outside of the scope of this survey, but I think requiring additional type ratings for each individual type is not consistent with fixed wing. For example, Transitioning from an R22 to R44, the aircraft have similar systems and are larger but are not totally dissimilar, whereas fixed wing, if a pilot trains on a four seat or two seat aircraft they can fly either.”

5.21 "The process needs to be more specific to Helicopters. A lot of the time the framework is taken from the fixed wing licences which really do not make sense in the helicopter world."

5.22 "Add more training to reflect real life experiences they will encounter when flying (or at least give the option of this as part of the course) without extending or contracting the course.

The course content is not the reason people don't finish it and it is not a deterrent. There are not enough good FIs."

5.23 “When flying to an airport... the circuits are sometimes different to general GA... which could be confusing and dangerous.... More help on this topic and teaching within the syllabus would be helpful”

We did

5.24 As with the comments received regarding the instructor pre requisites, we will take these comments into consideration.

5.25 Whilst most suggestions are out of scope of this project, they do give us subjects to look into after the project is complete.

Chapter 6

Next steps

- 6.1 We will now begin work on drafting the necessary documents, required by the Department for Transport (DfT), to implement changes to the ANO and Part-FCL.
- 6.2 We are working towards a legislative slot in Spring 2025.
- 6.3 We will also liaise with internal colleagues to ensure that our systems, internal instructions documents and all staff are ready for the implementation of these changes.

APPENDIX A**Abbreviations**

AMC	Acceptable Means of Compliance
ANO	Air Navigation Order 2016
AOC	Air Operator's Certificate
ATO	Approved Training Organisation
CAP	Civil Aviation Publication
CPL	Commercial Pilot Licence
CRD	Consultation Response Document
DfT	Department for Transport
DTO	Declared Training Organisation
EASA	European Aviation Safety Agency
EU	European Union
FCL	Flight Crew Licensing
FI	Flight Instructor
GA	General Aviation
ICAO	International Civil Aviation Organisation
IR	Instrument Rating
LAPL	Light Aircraft Pilot Licence
MEP	Multi-Engine Piston
MET	Multi-Engine Turboprop
NDB	Non-directional beacon
NPPL	National Private Pilot Licence
OEB	Operational Evaluation Boards
OSB	Operational Suitability Data
PPL	Private Pilot Licence
SARPs	Standards & Recommended Practices (ICAO Annexes)

SEP	Single Engine Piston
TK	Theoretical Knowledge
VFR	Visual Flight Rules
VOR	Very High Frequency Omnidirectional Range Station