Introduction to declared training organisations (DTO)

Christian KUCHER
Flight Crew Licensing Regulations Officer (EASA FS.3.2)

AERO 2017 - Friedrichshafen
1. Introduction

2. The DTO in detail

3. How to start and run a DTO

4. Next steps
1. Introduction

History of GA training organisations:

- National §§ Training organisations
- JAR-FCL Registered Facilities (RF)
- Regulation (EU) 1178/2011 Approved training organisations (ATO)

8 April 2018

AEROPLANES
HELICOPTERS
SAILPLANES
BALLONS
1. Introduction

Regulation (EU) No 1178/2011
‘Aircrew Regulation’

Annex I – Part-FCL

[...]

Annex VI – Part-ARA

Annex VII – Part-ORA

Part-ARA – authority requirements
- Rules for issuing licences, conduct of oversight of ATOs,...

Part-ORA – organisation requirements
- Rules on how to establish & run an ATO
- ATO needs prior approval
- Safety management
- Compliance monitoring system
- Manuals

Appropriate for general aviation?
1. Introduction

Regulation (EU) No 1178/2011
'Aircrew Regulation'

Annex I – Part-FCL

[...]  

Annex VI – Part-ARA

Annex VII – Part-ORA

Part-ARA – authority requirements
- Rules for issuing licences, conduct of oversight of ATOs,...

Training outside ATO
- ATO needs prior approval
- Safety management
- Compliance monitoring system
- Manuals

EASA RMT.0657
Training outside ATO

Opinion No 11/2016

Appropriate for general aviation?
1. Introduction

Regulation (EU) No 1178/2011
‘Aircrew Regulation’

Annex I – Part-FCL
[...]

Annex VI – Part-ARA

Annex VII – Part-ORA

Annex VIII – Part-DTO
Declared Training Organisations

Part-ARA – authority requirements
- Rules for issuing licences, conduct of oversight of ATOs,...

Part-DTO
- Rules on how to establish & run a DTO

- No prior approval but declaration
- No SMS but safety policy
- No CMS but annual internal review
- No manuals but training programmes
1. Introduction

Regulation (EU) No 1178/2011
'Aircrew Regulation'

- Annexe I – Part-FCL
  - [...]

- Annexe VI – Part-ARA

- Annexe VII – Part-ORA
  - Organisation requirements

- Annexe VIII – Part-DTO
  - Declared Training Organisations

- Part-FCL
  - Amendments to implement DTOs

- Part-ARA
  - New requirements for oversight of DTOs

- Part-DTO
  - Rules on how to establish & run a DTO
    - No prior approval but declaration
    - No SMS but safety policy
    - No CMS but annual internal review
    - No manuals but training programmes
1. Introduction

2. The DTO in detail

3. How to start and run a DTO

4. Next steps

Disclaimer:
Part-DTO still under review by Commission
2. The DTO in detail

OVERVIEW

2.1 Training scope
2.2 Personnel requirements
2.3 Safety policy
2.4 Training programme
2.5 Training aircraft and FSTD
2.6 Facilities
2.7 Aerodromes and operating sites
2.8 Theoretical knowledge instruction
2.9 Mandatory reporting
2. The DTO in detail

2.1 Training scope (DTO.GEN.110)

- **Aeroplanes**
  - Licences: LAPL(A), PPL(A)
  - Class ratings: SEP(land), SEP(sea), TMG
  - Additional ratings: Night, aerobatics, mountain, sailplane and banner towing

- **Helicopters**
  - Licences: LAPL(H), PPL(H)
  - Type ratings: single-engine helicopters with max. 5 seats
  - Additional ratings: Night
2. The DTO in detail

2.1 Training scope (DTO.GEN.110)

- **Sailplanes**
  - Licences: LAPL(S), SPL
  - Extension of privileges & additional ratings as available in Part-FCL
  - Flight instructor – FI(S)
  - Flight instructor refresher seminar
  - Flight examiner – FE(S)
  - Flight examiner refresher seminar

Prior approval
2. The DTO in detail

2.1 Training scope (DTO.GEN.110)

- Balloons
  - LAPL(B)
  - BPL
  - Extension of privileges & additional ratings as available in Part-FCL
  - Flight instructor – FI(B)
  - Flight instructor refresher seminar
  - Flight examiner – FE(B)
  - Flight examiner refresher seminar

Prior approval
2. The DTO in detail

2.2 Personnel requirements (DTO.GEN.210)

Personnel structure for an ATO in accordance with Part-ORA Subpart ATO Section I
2. The DTO in detail

2.2 Personnel requirements *(DTO.GEN.210)*

- Representative
- Head of training
- Instructors

Personnel structure for an **DTO** in accordance with Part-DTO
2. The DTO in detail

2.2 DTO – Personnel requirements (DTO.GEN.210)

Representative responsible for:
- Overall compliance of DTO
- Safety promotion and safety policy
- Availability of sufficient resources

No operations manual required!
2.2 Personnel requirements (DTO.GEN.210)

Head of training (HT) responsible for
- Compliance of training courses with Part-FCL and DTO scope
- Integration of theoretical, FSTD and practical training
- Supervision of progress of students
2. The DTO in detail

2.2 Personnel requirements (DTO.GEN.210)

- Representative
- Head of training
- Instructors
  - Theoretical knowledge instructors
  - Flight instructors
2. The DTO in detail

2.2 Personnel requirements (DTO.GEN.210)

Roles of representative and HT can be combined and filled by one single person.
2. The DTO in detail

2.3 Safety policy (DTO.GEN.210 (a) (1) (ii))

- To be established by the representative

Objectives

- Safe operation of all DTO activities
- Implementation of appropriate procedures in order to ensure safe operation

AMC to define minimum content

- Risk identification & risk assessment
- Implementation and follow-up of mitigating measures

Safety policy: not part of the declaration
2.4 Training programmes (DTO.GEN.230)

Training programme

- Aim of the course
- Credits for previous experience
- Detailed list of all air and FSTD exercises
- Structure and content of theoretical knowledge instruction
- Syllabus summary
- Structure of the entire course & integration of syllabi
- Student progress checks, as appropriate
2. The DTO in detail

➤ 2.5 Training aircraft and FSTD *(DTO.GEN.240)*

➤ 2.6 Facilities *(DTO.GEN.215)*

➤ 2.7 Aerodromes and operating sites *(DTO.GEN.250)*

➤ DTOs for aeroplanes and helicopters:

If more than 2 ‘base aerodromes’ are intended to be used, additional resources need to be demonstrated to the competent authority.
2. The DTO in detail

- **2.8 Theoretical knowledge instruction (DTO.GEN.260)**
  - On site learning (classroom teaching, 1:1 instruction)
  - Distance learning
  - In any case: student progress to be monitored appropriately by the DTO.
2. The DTO in detail

2.9 Mandatory reporting (DTO.GEN.270)

- **Annual internal review**
  - Review of DTO activities
  - Example: training, application of safety policy
  - AMC with details

- **Annual activity report**
  - Statistical data for past calendar year
  - Example: Training courses provided, number of students...
  - AMC with details

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No compliance monitoring manual required!

submit 1x per year

Competent authority
1. Introduction
2. The DTO in detail
3. How to start and run a DTO
4. Next steps

Disclaimer:
Part-DTO still under review by Commission
3. How to start and run a DTO

Declaration in accordance with Appendix 1 to Part-DTO

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Date, name and signatures of representative and head of training
3. How to start and run a DTO

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- Representative
- Head of training

**Training scope**
- List of training courses
- List of training programmes used (documents to be attached)
- List of AltMoC used (documents to be attached)

**Statements**
- Statement of compliance
- Statement of safety policy
- Airworthiness of training aircraft
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**Date, name and signatures of representative and head of training**
3. How to start and run a DTO

3.1 How to start a DTO

'I want to start a DTO!'
3. How to start and run a DTO

3.1 How to start a DTO

DTO can start!

Declaration

Training programme

DTO

CAA

DTO can start!
3. How to start and run a DTO

3.1 How to start a DTO

Declaration

Training programme

Acknowledgement of receipt

AMC: within 10 working days after receiving the declaration.
3. How to start and run a DTO

3.1 How to start a DTO

Declaration

Training programme

DTO

OK

CAA

Not ok / Findings

Not ok / Findings
3. How to start and run a DTO

3.2 How to run a DTO

Essential obligations of the existing DTO

- Training in compliance with Part-FCL and the training scope declared
- Submission of
  - Annual internal reviews
  - Annual activity reports
- Notification of changes to the content of the declaration
- Notification of cessation of training activities
3. How to start and run a DTO

3.2 How to run a DTO

Initial inspection: Within 12 months after initial declaration

Inspections: At least once in 72 months (AMC)

Audits / unannounced inspections: As necessary
3.2 How to run a DTO

Corrective action to be taken by the DTO.

Unsatisfactory corrective action: Limitation or prohibition of DTO activities until corrective action is taken properly.
1. Introduction
2. The DTO in detail
3. How to start and run a DTO
4. Next steps
4. Next steps

- Draft for Part-DTO currently under review at the Commission
- Voting in EASA committee expected for the next months
- 8 April 2018: Entry-into-force (planned)
SUMMARY

Declared training organisation (DTO) – in a nutshell

- Training organisation for non-commercial licences.
- No prior approval required → declaration.
- Simplified personnel and organisation requirements.
- Revised oversight requirements for competent authorities.
- Available from 8 April 2018.
Thank you!

Your safety is our mission.
Introduction to declared training organisations (DTO)

Christian KUCHER
Flight Crew Licensing Regulations Officer (EASA FS.3.2)

AERO 2017 - Friedrichshafen

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