

Guidance Criteria for Declared Training Organisations

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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 principle 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.

Furrther 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 principle 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 Principle 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 Principle 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 configuration of less than 6.
TMG	Differences Training in accordance with the published Type Operational Suitability Data report.
Night Rating	Night Rating
Aerobatics Rating	
Mountain Rating	
Sailplane and Banner Towing 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 Principles

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 Principle 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 Principle 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 principle 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