



## SAFETY ALERT 2017-12

### Issue 01

Date of Issue: 16<sup>th</sup> October 2017

#### SUBJECT:

DISTANCE LEARNING

#### REFERENCE PUBLICATIONS:

CAR-OPS1 SUBPART Q

CAR-OPS3 SUBPART Q

#### REASON:

The advent of the internet and widespread use of computers have led to a huge growth in distantly delivered tuition, study and examination by operators. Distance learning or on-line via CBT is known by many terms, but in general, it is a way of learning from afar without being in regular face-to-face contact with instructors in a class room setting, engaging with learning materials at home or at work when possible including during off days. Although distance learning has several benefits, there are many views with regards to flight crew utilization and the regulatory flight duty time.

The scope of distance learning covers recurrent training and supplementary subjects, but consideration can be given to initial training subjects if instructional effectiveness can be demonstrated.

Following several oversight activities conducted by the GCAA and the CATCC held in 20<sup>th</sup> April 2017, the GCAA has received many questions regarding requirements for considering distance learning as a flight crew and cabin crew duty as far as CAR-OPS1 subpart Q and CAR-OPS 3 Subpart Q are concerned.

This Safety Alert is issued to reiterate the need for adherence to the definition of “duty” requirements and correlation between distance learning and crew fatigue regulatory requirements to prevent adverse effects of the program.

*This Safety Alert is information only, recommendations are not mandatory. At this time, the safety concern described in this Safety Alert does not warrant the issuance of a Safety Decision or a change on the regulation. However, it is the responsibility of the concerned organisations to implement them and the GCAA may during its oversight activities verify the means concerned organisations have established to: (1) comply with CAR-OPS1 subpart Q and CAR-OPS3 subpart Q; and (2) prevent any occurrence of the safety concern described in this Safety Alert.*

#### RECOMMENDATIONS

##### Recommendation No. 1:

- a) *Air Operators are reminded to adhere to the definition of “duty” stated in CAR-OPS1 and CAR-OPS3 and they must ensure that they have correctly and effectively integrated in their Duty Time calculation principles for flight crew and cabin crew (as applicable) any tasks unless it is*



*demonstrated to the GCAA that this task does not induce fatigue<sup>1</sup>. Unless proven otherwise by the Air Operator, distance learning qualifies as a “duty”.*

- b) Distance learning should be controlled within the absolute limits of duty period deemed practical to the Air Operator (e.g. annual datum appears to offer less disruptive management for the Air Operators and the concerned individuals).*

**Recommendation. No.2:**

*When conducting Distance Learning, Air Operators should ensure that:*

- a) all distance learning or on–line (CBT) accrues duty hours are recorded and kept for a period of at least 15 months (as per CAR-OPS 1.1065) from the date of the last relevant entry with the following information:*
- i. Name of candidate;*
  - ii. Subject or test title;*
  - iii. Duration of planned training or test and number of days required; and*
  - iv. The datum period used by the Air Operator to account for the calculation of the flight duty period (Recommendation 1.b refers);*
- b) all distance learning policies, requirements and procedures are properly documented and explained in the relevant part of the Operators’ Operations Manual and justified to ensure that they are effective;*
- c) the Operations Manual content concerning distance learning is accepted by the GCAA; and*
- d) an appropriate amount of duty hours for each distance learning module is introduced and recorded.*

**Recommendation. No.3:**

*Air Operators are not required to include distance learning as part of their roster. However, their system should ensure that:*

- a) Internal feedback means are established to maximize fatigue information capturing from flight/cabin crews (following a distance learning training);*
- b) All feedbacks are treated in an just-culture manner (i.e. fair to the individuals and to the organisation too); and*
- c) Distance learning framework is continuously improved with due consideration of all feedbacks received.*

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<sup>1</sup> As per CAR-OPS1 and CAR-OPS3, duty is defined as “any task that crew member is required by the operator to perform, including, for example, flight duty, administrative work, training, positioning and standby when it is likely to induce fatigue”.