



# Part 147 CAP Document - Updates



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# Overview of CAA CAP Updates



## CAP 1528 Guidance for Part 147 Instructors

- Basic qualifications expected for a Part 147 instructor
- Instructor v Contractor Guidance

## CAP 1529 Practical Training within a Part 147

- Instructor v Contractor Guidance

## TNA Guidance within a Part 147

- Option 1: New Document detailing how TNA's should be created and the information to be placed within them
- Clarification of the use of SF forms and where they should be placed.
- Option 2: Full use of EASA User guide

# Overview of CAA CAP Updates



Basic qualifications expected for a Part 147 instructor

It is deemed in support of the EASA UG.CAO.00014 all UK Part 147 organisation shall qualify their instructors as:

- *Hold a Part 66 aircraft maintenance engineer license applicable to the relevant category/sub-category*
- *Provide evidence of previous employment as a basic mechanical or electrical engineering training instructor*
- *Hold an aeronautical / electrical or mechanical engineering degree and have successfully completed a formal instructors techniques course*
- *Provide evidence of previous employment as a technical training instructor*

# Overview of CAA CAP Updates



Once the basic qualification of the instructor is confirmed then the employment status should also be clarified:

- Any staff on 'zero hours contracts' will be considered as contractors, unless the organisation can satisfy to the CAA that an individual:
  - *i) Meets the requirements for an [employee](#);*
  - *ii) Is required to report for work when requested;*
  - *iii) Does not perform any work for another aviation maintenance training organisation.*
- A failure to meet any of the requirements above is considered to be a failure of the organisation to fulfil its obligations under Part 147.

Findings of the appropriate level will be raised in accordance with Part 147.A.160. Where this impacts on the capability of the organisation to perform its approved scope of work the CAA may decide to suspend, limit or revoke the affected parts of the approval.

**The use of contract instructors is permitted providing the organisation can evidence that without the use of the contractors they can still support the organisations scope of approval.**

# Overview of CAP 1529 Updates



Clarification of what is meant by 'Practical Training':

Generally, knowledge is evaluated by examination.

The purpose of the CAP document is not to describe the examination process but to aid with the evaluation of 'skills' and 'attitude' after training containing practical elements.

The trainee needs to demonstrate to the assessor that they have sufficient knowledge to perform the required tasks.

# Overview of CAP 1529 Updates

Assessment should look to focus on:

- Environment awareness
- Systems integration
- Knowledge and understanding of areas requiring special emphasis or novelty
- Using reports and indications (the ability to read and interpret data)
- Aircraft documentation finding and handling
- Perform of maintenance actions

# Overview of CAP 1529 Updates



## Remote Sites

Practical training carried out in locations not listed in the organisation's approved MTOE, must be treated as a remote site and approved as per 147.A.145(c).

Sufficient time should be allowed for the establishment of contractual agreements and CAA review/approval prior to the course being started

Details to be provided are:

- Completed SRG1019
- Copy of supporting Internal audit
- Details of Instructors/Examiners (copy of PAC will suffice)
- Any supporting documents i.e contracts relating to Aircraft for Theory and Practical training.



# Overview of CAP 1529 Updates



Remote sites are now based on the following:

- Whether the org has the privilege in Section 2.8 of their MTOE
- And number of remote site conducted in the previous year. (the funding is calculated on numbers conducted and sits in 3 groups. (See CAA Scheme of Charges)

Any organisation not wishing to be charges for remote sites should ensure the privilege is removed from their exposition.

# Overview of TNA Guidance to Industry



Two options currently in consideration:

Option 1: A dedicated CAP document that will fully explain the rationale and approach behind TNA's and how the EASA SF form work alongside them to support the training ethos with a Part 147 organisation.

Option 2: Full implementation of the EASA UG and associated guidance



**Questions?**