

Part 147 CAP Document Updates

Damian McConnochie
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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 1528 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.

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Clarification of what is meant by 'Practical Training':

Generally, knowledge is evaluated by examination.

Sample Practical Logbook included so as to demonstrate an acceptable standard.

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

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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

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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 Current TNA Guidance to Industry

Two options currently in planning:

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