

# CONTINUATION TRAINING

## Guidance Document



### Introduction

This document is intended to provide a source of guidance to UK Civil Aviation Authority Regulated Organisations that require and conduct Continuation Training (CT). It has been developed in collaboration with a cross section of training organisations and details identified 'best learning practice' for continuation training. The aim of this CT framework is to assist all organisations, including training, maintenance, continued airworthiness and production, in design and delivery of their own CT programmes. With a view to improve training standards and consistency of CT, the wider aviation industry is encouraged to adopt this agreed best practice.

### Definitions

CAA	Civil Aviation Authority
CA/PA	Corrective Action / Preventive Action
CT	Continuation Training
CPD	Continuing Professional Development
EASA	European Aviation Safety Agency
EGR	Engine Ground Run

ETOPS	Extended Twin Engine Operations
EWIS	Electrical Wiring Interconnecting Systems
FTS	Fuel Tank Safety (SFAR)
HF	Human Factors
MOR	Mandatory Occurrence Report
NDT	Non-Destructive Testing

QAN	Quality Assurance Notices
RCA	Root Cause Analysis
RVSM	Reduced Vertical Separation Minima
SMS	Safety Management System
Syllabus	Learning Plan, Training Specifications
TNA	Training Needs Analysis

## General Definition

The term Continuation Training is often misconstrued or misunderstood by organisations. It is important that industry recognise what CT should cover, typical core subjects/durations, how it should be structured and the recommended method of how it should be delivered.

EASA regulations (EASA Part M.A 606, M.A.706, M.A.707, Part 145.A.30, Part 145.A.35, Part 147.A.105) identify the requirements for continuation training, to ensure that such staff remain informed and up to date/current.

*“Continuation training is a two-way process to ensure that certifying staff remain current in terms of procedures, human factors and technical knowledge and that the organisation receives feedback on the adequacy of its procedures and maintenance instructions”.*

Whilst the above refers to Part 145 regulation, organisations should also deliver CT to non-certifying staff, management, airworthiness, training and support staff.

The requirement to conduct CT training should not be clouded with other industry training elements that require recurrent training such as ETOPS, RVSM, EWIS, FTS etc. However, if an organisation wishes to blend the CT and other recurrent training elements into one combined training session (for operational reasons), then this should be clearly identified within the Training Needs Analysis (TNA) which define the CT core and non-core elements and timings.

With respect to Part 147 organisations, ‘update’ training is again slightly different as it is aimed at a different audience, the Instructor / Learning Professionals. This has been in place for Learning Organisations for some time and is commonly referred to as Continuing Professional Development (CPD). With this in mind, you can see why this is not directly a two-yearly CT / recurrent requirement, but instead a nominal 35 hours in two years. The syllabi / elements for update training should be tailored to the individual Instructor’s needs and kept separate from CT and any recurrent training.

## Defining the Training

The organisation should initially undertake a thorough TNA process to demonstrate how it identified relevant and company specific subjects to be covered during the CT. This analysis should consider all the elements required to fulfil the overall training objectives, and should identify detailed syllabi such as:

- Cross section of attendees / level / experience / organisational area
- Key learning objectives
- Core elements
- Lesson timings and information flow (syllabi)
- The TNA, in conjunction with the syllabi, should also identify the most effective delivery method that may be utilised for each element of the training. The focus should be on the delegates' needs and specific training objective, which is relevant to their job role.

This process should be fully documented within the Exposition and/or supporting procedures to provide an effective and robust trail for Quality Audit purposes.

When developing CT, it is important to identify 'Core' CT subject areas as part of the TNA. Often, there is an industry-wide tendency to use CT for a wider remit than its intended core purpose, which leads to CT including 'everything training related' within an organisation. From CAA's experience, CT frequently includes many other elements which are not regarded as 'Core.' Although important, those non-core elements can include for example, First aid training, Manual handling, Health and Safety, Fire Marshall, COSHH, Uniform booking procedure, etc. This can have a detrimental effect on the quality and standard of CT.

While providing training is always a positive step and company investment in the individuals, these elements should not be part of the TNA as these are not considered to be 'Core' CT areas.

The actual content of CT will vary from organisation to organisation considering the size and complexity of the organisation and operations, scope of work / approvals, current issues, audit feedback (including corrective, preventive actions and root causes). However, the minimum common core areas to be included within the TNA are:

Regulation / Legislation	Overview and recap on the current regulation structure and major updates to EASA and/or UK CAA regulation / upcoming changes, relevant to your organisation and its approvals. Consider the use of EASA FAQs for the relevant regulation.
General Company Organisation	Review of the company current exposition(s) and relevant parts, including any senior management / post holder changes, scope of work, facilities, locations and general business update and any forms / check sheets etc that have been updated. The students have the opportunity to provide two-way feedback on current issues / environment.
Company Procedures	A review of company procedures with specific focus on how to correctly identify and locate procedures. Staff will not be able to remember each procedure in detail (some organisations may have hundreds), the focus should ideally be on timely access to correct procedures and paperwork, so staff can find what they need, when they need it. New/recent procedures or procedures that have been found problematic or contributing to errors may be reviewed in detail. E.g. the remote booking of spares on a line station) If the organisation experienced a drop of general standards, the focus should remain on where and how to access procedures, encouraging desired attitudes/behaviour and understanding why people do not follow approved procedures / processes.
Quality Overview	A review of the latest Quality material (i.e QANs, trends, findings, etc) should be made available including recent issues identified within the organisation and industry-wide. Any recurrent findings or issues (desensitised) t which have resurfaced should be given particular attention Such findings/issues can be used as an interactive group case study during the CT session. Internal QA related approvals and applications / process and control should also be reviewed.
Company Reporting	Recent reports from internal and external reporting systems should be reviewed and promoted (desensitised). External publications and analysis of MORs/'near misses' should also be reviewed (e.g. <a href="#">CAP1367 Aircraft Maintenance Incident Analysis</a> ). Staff should be aware of how to submit a report within your organisation, (i.e. which forms to complete or process to follow) and what happens with submitted reports. Also, they should be made aware of the CAA MOR scheme and how to submit an MOR Attention should be paid to the mandatory items and time scales ( <a href="#">EASA Reporting Portal</a> ). CAA whistle blowing policy could be communicated. Attention to Just Culture should be observed.
Human Factors	Desensitised HF related internal incidents or high-profile external events should be reviewed and incorporated. Focus should be on more pertinent examples where failings can be discussed. Group interaction should be promoted during training to discuss what went wrong, how it happened, why it happened, could it happen to you, etc. It is not recommended to replay old HF material and videos (e.g.Piper Alpha, Aloha B737 etc) as the staff will quickly become disengaged and gain little from the experience. The trainer should use recent organisational experiences and industry examples / exercises / handouts, etc. to retain the group's interest. Consideration to non-aviation related events, for example, from Rail or Medical industry. may be considered if appropriate. The important objective is for all to learn from previous incidents in an open and just environment.

Technical / Technology Updates	<p>Technical updates should be relevant to the organisation. As a minimum, aircraft related items should include reviews of any mandatory modifications (ADs) or recent SBs, etc. that have been incorporated to the company fleet). Consideration should also be given to staff who hold specialist approvals within the organisation, such as Stores, Quality, Reliability, Maintenance Control, ARC signatories, Form 4 post holders, NDT, Borescope, EGR, Technical Instructors, etc.</p> <p>Organisational management should take the opportunity to not only meet compliance needs but to gain something operationally positive from the session too. For example, the company's reliability department might provide the trainer with details on the most common fleet issues and reasons for technical delays. Such information can enhance engineers' awareness of the key problem areas. Records department may produce samples of incorrectly completed paperwork or Stores provide examples of incorrect return labels and Form 1 errors they have spotted on components etc.</p> <p>Organisations may also wish to consider information from AAIB, CHIRP and CAP 1145, if no events have occurred in their organisation. Training should be developed to provide and meet organisational needs</p>
SMS	<p>Organisation should consider use (if applicable) of SMS related material and recent safety topics and events. (SMS is currently only required for AOC Operators/Organisations)</p>
Feedback	<p>Open forum for feedback between trainers, management and staff. If training is delivered face to face training it promotes open dialogue, exchanges and sharing of experiences. However, organisations should consider and promote anonymous feedback as well.</p>

## Durations of Training

The TNA and its syllabi will define the timings for each element of the training. Typically, between one to two days, depending on the size and complexity of the organisation, should be allocated to the core elements (35 hours are required for Part 147 instruction staff). The core elements may be either broken into separate parts or delivered continuously, with each part taking credit towards the training within the two-year period. The process and its verification should be clearly structured and able to provide a fully auditable trail when scrutinised.

## Training Delivery

The TNA and its syllabi will define the delivery methods chosen by the organisation. This may take the form of either classroom-based delivery or other methods, such as online, webinars or remote self-study.

Where online or remote training is utilised, the organisation should clearly identify within its procedures, how this element will be controlled, managed, updated and verified. Extra consideration should be given to this method as it needs to be particularly robust given the nature of how the training is conducted. Recognising that there are generational and societal shifts towards more blended / online learning the TNA should identify which method has been selected and why, the Human Factors CT element is most effective when it is delivered face to face as this promotes open dialogue, exchanges and sharing of experiences. It also allows the trainer to establish understanding of the covered topics.

The more commonly completed external online training packages (currently within the maintenance sector) include Human Factors, FTS and EWIS.

When organisations choose to subcontract the training to another organisation they should ensure that instructors meet the same criteria above and have the relevant knowledge to perform the technical elements of the training satisfactorily. Training may be broken down into bite size chunks, as long as the training outcomes are still achieved.

If subcontracted, it is important to ensure the training is bespoke to your organisation as required by regulation. While it is generally accepted that certain elements of CT can be generic, no training company should be able to enter your organisation and deliver CT, without some form of bespoke adjustment to reflect your procedures, forms, paperwork, HF issues, QA issues and other general organisation customisation.

When organisations decide to contract the training out, it would be expected to see a contract between the parties with the above period of bespoke adjustment having taken place. Again, this should be backed up with a TNA with robust Quality Department oversight and approved Exposition procedure.

As with most training, face to face delivery will normally produce the best results and should, wherever possible, be the primary delivery method. Experience shows that groups of individuals gain greater benefit and absorption of information via debates and face to face interaction. This level of communication normally delivers more effective learning cycle as opposed to a traditional, I talk - you listen based experience. This level of interaction is especially beneficial to larger organisations that have a diverse work scope. And it also generally makes the training more interesting and relevant for all involved.

For the reasons above, online/remote training, smaller groups or 'one to one' training should ideally be avoided or kept to a minimum, whenever possible.

As larger organisations may have several differing areas of concern, consideration needs to be given to the development of individual training segments appropriate for different staff groups for example, a training session focused on internal Stores related procedures/information is delivered to Stores personnel only. If an Airbus A330 Technical updates training is delivered to a mixed group of personnel, it needs to be recognised that a Stores person may not need or want to know the finite details of a wiring modification on the aircraft. Therefore, when training is not specific to a business area and delivered to mixed groups of staff from all parts of the business, care needs to be given to ensure each training session remains informative and inclusive to all, without watering down any key elements for each subject area.

## **Instructional Staff**

CT should be a constantly evolving training programme and the management should promote and enable a transition of relevant information from all its departments to the training department or nominated training person/s.

Typically, in a smaller or medium sized organisation, the Quality Department or Manager may absorb the role of continuation trainer. However, regardless of who delivers the training, time should be allocated to allow them to comprehensively prepare the content and formal delivery.

Larger organisations would normally have a dedicated training department. The training department should, however, be proactively supported by the business and supplied with the specific information to include into the training content. This practice should be taking place regularly to support delivery of up-to-date CT. Any associated procedures should be detailed in the exposition.

The trainers for all organisations (regardless of their size) should be competent in delivering training. As a minimum, instructors are expected to receive some form of a formal instructional techniques training to equip them with the basics of training delivery. They should be subject to regular competence assessment for the position they hold within the organisation.

## Verification

Although there is no specific examination requirement for CT, organisations may choose to use some form of examination or assessment throughout the course. For example, in Human Factors relevant subjects, student active participation and awareness could be an indication of a pass / good level of understanding / engagement with effective open questioning.

Examination / testing is especially important for online / remote training as there is normally no direct interaction at the point of delivery between Student and Instructor, Therefore, an examination is a basic method of testing knowledge transfer and basic understanding of the subject. The selected verification method of understanding should be detailed within the company's procedures and TNA.

## Records

Organisations should also consider how best to record the CT that has been delivered. Records should also ensure that all staff that have been trained to same level/syllabus; and where someone has missed training how the organisation recover the situation so as to ensure the person is given the training they have missed. There is no requirement for certificates to be issued but there should be syllabi for the training provided. The syllabi may be subject to audit by the competent authorities. The training records can be in any format, paper, electronic or a mixture thereof. The retention of such records should be in line with the Regulatory requirements of Part 21, M, 145 and 147.

## Sample TNA

CAP 716 Appendix U covers guidance for a TNA – ([click here](#))

**END**