Vocational education and training in South Australia Submission 10



Submission from the Civil Aviation Safety Authority Inquiry into Vocational Education and Training in South Australia

TAFE SA has held a maintenance training organisation (MTO) approval, issued by the Civil Aviation Safety Authority (CASA) under Part 147 of the *Civil Aviation Safety Regulations* 1998 (CASR) since April 2014. Aviation Maintenance Engineering training is undertaken to the Diploma in Aeroskills training standard, in either mechanical or avionics pathways, as approved by the Australian Industry and Skills Committee (Department of Education), and the individuals meet the licensing requirements as set by CASA under the CASR Part 66 regulations (the diploma is aligned to the Part 66 licensing requirements). Once the CASA regulated training requirements have been met and reported to CASA, by the CASA approved Maintenance Training Organisation (MTO), the student (applicant) applies to CASA for the issue of the respective maintenance engineers (Part 66) licence.

An audit of TAFE SA originally scheduled for April 2017 was brought forward to mid March 2017, when CASA conducted an audit of TAFE SA's aircraft engineering training. The audit identified a number of deficiencies in TAFE SA's training and examination standards and training records. At the request of CASA, TAFE SA voluntarily agreed to a suspension of their CASA-approved aircraft engineering training privileges until 11 September 2017. Although there were concerns, CASA assessed the overall safety risk as low, as all licence holders exercised their licence privileges under the control of CASA-approved aircraft maintenance organisations. All affected engineers (and employers) were notified in April of the deficient training standard and were requested to voluntarily cease exercising their individual licence privileges until a complete and thorough investigation had been conducted.

CASA completed a follow-up review in late August 2017. The audit identified improvements to TAFE SA systems and processes that reduced the likelihood that the suspension would be extended beyond 11 September 2017.

On 12 September, TAFE SA affirmed its prior agreement to a staged resumption of their MTO privileges. Stage 1 of the proposal prevented TAFE SA undertaking certain types of training and prevented TAFE SA's capacity to recognise prior learning. CASA reviewed training materials, guidance documentation and the keystone document upon which an authorisation is based – the MTO Exposition (MTOE) which is the high level manual including associated documented procedures that is approved by CASA for aviation technical training. CASA was satisfied that the TAFE SA MTOE and responses to the March audit findings were collectively sufficient to allow a conditional Part 147 certificate to be issued.

CASA independently assessed the affected licence holders' training records to ascertain their assessment gaps. As at December 2017, a total of four Civil Aviation Safety Regulation Part 66 aircraft maintenance engineer licence holders out of 92 individuals affected were fully cleared as a result of additional training being met, 79 licence holders had certain restrictions placed on their previously issued licences to restrict what they are able to certify, six students had their full licence privileges suspended and 3 students who were detected before the issue of their licence were still to complete the necessary training and/or assessment in order to have their licences issued.

All affected individuals have received formal CASA correspondence advising them of the implications to their licences if already issued, including the imposition of restrictions where necessary; and advising them of the deficient training that was identified during the CASA investigation. All affected individuals continue to be supported by CASA, in respect to

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rectifying these deficiencies, either through CASA directly (where possible) or through a CASA approved MTO. The time taken to rectify these training deficiencies is dependent on the magnitude of the identified deficiencies, the training organisations they may be dealing with, workplace constraints and how pro-active the individuals are. There is no fixed period and some may take months to a year, however some training deficiencies have been rectified already.

In November, TAFE SA had the suspension lifted and all necessary conditions (restrictions) were removed, enabling them to recommence operating at full aviation training capability. They are now fully certificated under Part 147 and are able to provide CASA approved aviation training.

CASA continues to work with TAFE SA and other CASA approved MTOs in conjunction with affected individuals and their employers to remove the licence limitations and/or full licence suspensions imposed since April 2017.

CASA will undertake heightened surveillance by scheduled six monthly auditing, until such time as CASA is assured TAFE SA is remaining compliant and able to go back to normal 12 monthly auditing protocols. TAFE SA has been highly cooperative with CASA during this process.