

RA 4807 - Certifying Staff¹ and Support Staff (MRP 145.A.35)

Rationale

Within a Maintenance organization, those personnel required to undertake Maintenance tasks and those that certify successful completion of Maintenance are required² to be Suitably Qualified and Experienced Persons (SQEP). Without a system to ensure that staff employed in the Maintenance of Air Systems and components are Competent, personnel leadership and management of essential functions could be compromised. This could increase the Risk of Maintenance Occurrences; the organization operating outside its scope of work; and potentially increasing Risk to Life. This RA details the requirements for Maintenance organizations to ensure that ► all Tradespersons, Supervisors and Coordinating / Certifying Staff ◀ are suitably qualified, experienced, assessed as Competent and appropriately authorized to undertake their duties.

Contents

► Definitions Relevant to this RA ◀

4807(1): Staff Knowledge (MRP 145.A.35(a))

4807(2): Certification and Supervisory Authorizations (MRP 145.A.35(b))

4807(3): Staff Experience Requirements (MRP 145.A.35(c))

4807(4): Staff Continuation Training (MRP 145.A.35(d))

4807(5): Continuation Training Programme (MRP 145.A.35(e))

4807(6): Certifying Staff Competence Assessment (MRP 145.A.35(f))

4807(7): Issue of Certification Authorization (MRP 145.A.35(g))

4807(8): Certification Authorization Codes (MRP 145.A.35(h))

4807(9): Responsibility for Issuing Certification Authorization (MRP 145.A.35(i))

4807(10): Record of Staff (MRP 145.A.35(j))

4807(11): Provision to Staff of a Copy of Their Authorizations (MRP 145.A.35(k))

4807(12): Requirement to Produce Certification Authorization (MRP 145.A.35(l))

4807(13): Withdrawn – Not deemed regulatory material

Definitions

► Definitions Relevant to this RA

1. **Tradesperson.** Suitably Competent and authorized staff responsible for executing Air System Maintenance activities. This role may also be known as Support Staff within Approved Maintenance Organizations (AMOs) or 1st Signature within Military Maintenance Organizations (MMOs).
2. **Supervisor.** Suitably Competent and authorized staff responsible for carrying out supervision of Tradespersons in the execution of their Maintenance activities. This role may also be known as the 2nd Signature within MMOs.
3. **Coordinating / Certifying Staff.** Staff holding Authorization by the Maintenance organization to endorse the appropriate Certification of Air System Release and / or Component Release (Air System coordination / Work Order coordination)³. This term will not be confused with the term certifying staff used uncapitalised or on its own, this is the collective noun for Maintenance personnel with responsibilities for signing Maintenance documentation as either Tradesperson, Supervisor or Coordinating / Certifying Staff. ◀

¹ Refer to RA 4801 – Certifying Staff.

² Refer to RA 1002 – Airworthiness Competent Persons.

³ ► Refer to RA 4812 – Certification of Air System Release and Component Release (MRP 145.A.50). ◀

**Regulation
4807(1)****Staff Knowledge (MRP 145.A.35(a))**

4807(1) In addition to the appropriate certifying staff requirements⁴, the organization **shall** ensure that ► **all Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀ have an adequate understanding of the relevant Air Systems and / or components to be maintained, together with the associated organization procedures.

**Acceptable
Means of
Compliance
4807(1)****Staff Knowledge (MRP 145.A.35(a))****Common AMC**

4. The organization **should** hold copies of all documents that attest to qualification, and to recent experience.

Additional AMC –MMO only

5. Nil.

Additional AMC –AMO only

6. In the case of ► **Coordinating / Certifying Staff** ◀, this **should** be accomplished before the issue or re-issue of Certification Authorization.

**Guidance
Material
4807(1)****Staff Knowledge (MRP 145.A.35(a))****Common GM**

7. 'Adequate understanding of the relevant Air Systems and / or components to be maintained together with the associated organization procedures' means that the person has received training and has relevant Maintenance experience on the product type and associated organization procedures such that the person understands how the product functions and what the more common Faults with associated consequences are.

Additional GM – MMOs only

8. Nil.

Additional GM – AMOs only

9. 'Certification Authorization' means the Authorization issued to ► **Coordinating / Certifying Staff** ◀ by the organization and which specifies the fact that they may endorse the Certification of Air System Release⁵ within the limitations stated in such Authorization on behalf of the organization.

**Regulation
4807(2)****Certification and Supervisory Authorizations (MRP 145.A.35(b))**

4807(2) Excepting those cases listed in RA 4806(10)⁶ the organization **shall** only issue Certification and supervisory Authorizations to ► **Coordinating / Certifying Staff and Supervisors** ◀ in accordance with (iaw) the following criteria:

- (a) Authorization **shall** relate to the basic categories or subcategories for which they are qualified.
- (b) Authorization **shall** be limited to those Air System types on which they have been qualified.
- (c) Where Certification Authorization is being granted to individuals holding an Aircraft Maintenance licence in

⁴ Refer to RA 4806(7): Air System Certifying Staff (Line Maintenance) (MRP 145.A.30(g)) - Approved Maintenance Organizations only and RA 4806(8): Air System Certifying Staff (Base Maintenance) (MRP 145.A.30(h)) - Approved Maintenance Organizations only.

⁵ Refer to RA 4812 – Certification of Air System Release and Component Release (MRP 145.A.50).

⁶ Refer to RA 4806(10): Non-engineering Staff (MRP 145.A.30(j)).

**Regulation
4807(2)**

compliance with Civil Aviation Authority (CAA) ► **Part 66** ◀, such Authorization **shall** only be issued subject to the Aircraft Maintenance licence remaining valid throughout the validity period of the Authorization and the certifying staff remaining in compliance with their licence.



**Acceptable
Means of
Compliance
4807(2)**

**Certification and Supervisory Authorizations (MRP 145.A.35(b))
Common AMC**

10. The organization **should** only issue the Certification Authorization when satisfied that compliance has been established with the appropriate clauses of MRP Part 145 and that the person meets the applicable eligibility criteria¹.

Additional AMC – MMOs only

To be read in conjunction with the Common AMC.

11. In derogation to RA 4807(2)(a), MMOs may, in exceptional circumstances, authorize an individual to undertake the ► **Supervisor role** ◀ outside of their trade boundary. Such Authorization **should** be limited by task and period and **should** only be undertaken when the ► **Tradesperson** ◀ for the task:

- a. Is working within their trade boundary; and
- b. Meets the qualification criteria (Refer to RA 4807 Sub-Regulation (2)(b)).

12. In order to meet the qualification criteria stipulated, individuals **should** only be issued ► **Supervisor or Coordinating / Certifying Staff** ◀ Authorizations after they have completed the applicable Air System type training and had the associated qualification annotated on their training record.

Additional AMC – AMOs only

13. Nil.

**Guidance
Material
4807(2)**

**Certification and Supervisory Authorizations (MRP 145.A.35(b))
Common GM**

14. This Regulation ensures that staff can only be granted Certification Authorization while they meet the qualification requirements for certifying staff.

Additional GM – MMOs only

15. The Responsibility for establishing the content of the Air System type training courses detailed at paragraph ► **12** ◀ remains the Responsibility of the relevant Training Requirements Authorities. However, as a minimum, the training will provide the individual with a general understanding of the Air System type, together with the location and function of its principal components / assemblies, as applicable to the individual's trade. Such training will also draw attention to the Hazards associated with these Systems. Successful completion of this training will lead to such fact being recorded as a qualification on the individual's training or Competence record. The means of delivering such training is at the discretion of the Commands and may include, but is not limited to, pre-employment training, a standalone training course or an appropriate element / module of a longer, modular type training course.

Additional GM – AMOs only

16. Nil.

**Regulation
4807(3)****Staff Experience Requirements (MRP 145.A.35(c))**

4807(3) The organization **shall** ensure that all ► **Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀ have at least 6 months of actual relevant Air System or component Maintenance experience in any consecutive 2 year period following initial Authorization.

**Acceptable
Means of
Compliance
4807(3)****Staff Experience Requirements (MRP 145.A.35(c))****Common AMC**

17. Nil.

Additional AMC – MMOs only

18. Where unpredictable variations in operational military tasking require the use of personnel not meeting the 6-month experience requirement, agreement from the Accountable Manager (Maintenance) **should** be sought. Such Authorization **should** be on a temporary basis only, with suitable precautionary measures put in place, and the Military Continuing Airworthiness Management Organization informed. Alternatively, personnel will require their Competence to be reassessed prior to reauthorization; further detail is contained below in Paragraph 20.

Additional AMC – AMOs only

19. Nil.

**Guidance
Material
4807(3)****Staff Experience Requirements (MRP 145.A.35(c))**

20. For the purpose of this Regulation, 'have...actual relevant Air System or component Maintenance' means that the person has worked in an Air System or component Maintenance environment and has either exercised the privileges of the Certification / supervision Authorization or has actually carried out Maintenance on at least some of the Air System type Systems specified in the particular Certification / supervision Authorization.

21. This Regulation does not apply to the initial Authorization or reauthorization of certifying staff and support staff with supervisory responsibilities; the experience levels of these individuals will be considered as part of the Competence assessment⁷.

22. RA 4807(5): Continuation Training Programme (MRP 145.A.35(e)) applies once an Authorization has been granted, necessitating an experience 'currency' requirement (also known as 'recency') for ► **Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀ to maintain their Authorization.

**Regulation
4807(4)****Staff Continuation Training (MRP 145.A.35(d))**

4807(4) The organization **shall** ensure that all ► **Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀ receive sufficient continuation training in each 2 year period to ensure that such staff have up-to-date knowledge of relevant technology, organization procedures and Human Factor issues.

**Acceptable
Means of
Compliance
4807(4)****Staff Continuation Training (MRP 145.A.35(d))****Common AMC**

23. Nil.

Additional AMC – MMOs only

⁷ Refer to: RA 1002 – Airworthiness Competent Persons; RA 4806(5): Personnel Competences and Authorization (MRP 145.A.30(e)); and RA 4807(6): Certifying Staff Competence Assessment (MRP 145.A.35(f)).

**Acceptable
Means of
Compliance
4807(4)**

24. Single-Service orders **should** detail the continuation training requirements within each 2 year period in order to:
- Ensure that staff are familiar with any changes made to relevant Regulation, policy and procedures (including Maintenance procedures) and the Modification standard of the Air System and / or components being maintained.
 - Learn from the experience of instances where staff failed to follow procedures, using evidence obtained from Quality Audits where appropriate, and the reasons why particular procedures are not always followed.
25. As part of staff continuation training, all personnel who undertake flight servicing **should** periodically undergo flight servicing Competency checks at least every 12 months.

Additional AMC – AMOs only

26. Continuation training is a 2-way process to ensure that certifying staff remain current in terms of procedures, Human Factors and technical knowledge and that the organization receives feedback on the adequacy of its procedures and Maintenance instructions. Due to the interactive nature of this training, it **should** have involvement from the Quality department to ensure that feedback is actioned. Alternatively, there **should** be a procedure to ensure that feedback is formally passed from the training department to the Quality department to initiate action.
27. Continuation training **should**:
- Cover changes in relevant requirements such as MRP Part 145 changes, changes in organization procedures and the Modification standard of the products being maintained, plus Human Factor issues identified from any internal or external analysis of Incidents.
 - Address instances where staff failed to follow procedures and the reasons why particular procedures are not always followed. In many cases the continuation training will reinforce the need to follow procedures and ensure that incomplete or incorrect procedures are identified to the organization in order that they can be corrected. This does not preclude the possible need to carry out a Quality Audit of such procedures.
28. Continuation training **should** be of sufficient duration in each 2 year period to meet the intent of this Regulation, and may be split into a number of separate elements.
29. The method of training is intended to be a flexible process and could, for example, include an external continuation training course, aeronautical college courses, internal short duration courses, seminars etc. The elements, general content and length of such training **should** be specified in the Maintenance Organization Exposition (MOE).

**Guidance
Material
4807(4)**

Staff Continuation Training (MRP 145.A.35(d))

Common GM

30. Regulating the need for continuation training to keep staff updated in terms of relevant technology, procedures and Human Factors issues is one part of ensuring Quality. Therefore, its content and duration will be related to relevant Quality Audit findings and other internal / external sources of information available to the organization on human errors in Maintenance. It is recommended that the content and duration of continuation training is reviewed at least once in every 24 month period.
31. Defence Air Environment continuation training requirements⁸ for Human Factors must be followed.

⁸ Refer to RA 1440 – Air Safety Training.

**Regulation
4807(5)**

Continuation Training Programme (MRP 145.A.35(e))

4807(5) The organization **shall** establish a programme of continuation training for ► **all Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀, including a procedure for issuing Certification Authorizations under MRP Part 145 to certifying staff.

**Acceptable
Means of
Compliance
4807(5)**

Continuation Training Programme (MRP 145.A.35(e))

Common AMC

32. Nil.

Additional AMC – MMOs only

33. The continuation training programme may be established by a higher military formation than the MMO, particularly if continuation training is provided under single-Service arrangements. Nevertheless, MMOs **should** ensure that their staff comply with such programmes and that applicable training is completed prior to the issue of engineering Authorizations⁹.

Additional AMC – AMOs only

34. The programme for continuation training **should** list all ► **all Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀, when training will take place, the elements of such training and an indication that it was carried out reasonably on time as planned. Such information **should** subsequently be transferred to the certifying staff and support staff record¹⁰.

**Guidance
Material
4807(5)**

Continuation Training Programme (MRP 145.A.35(e))

35. Nil.

**Regulation
4807(6)**

Certifying Staff Competence Assessment (MRP 145.A.35(f))

4807(6) The organization **shall** assess all prospective and current certifying staff for their Competence, qualification and capability to carry out their intended certifying duties prior to the issue or re-issue of a Certification Authorization under MRP Part 145. For AMOs, this **shall** be iaw a procedure specified in the MOE.

**Acceptable
Means of
Compliance
4807(6)**

Certifying Staff Competence Assessment (MRP 145.A.35(f))

Common AMC

36. Nil.

Additional AMC – MMOs only

37. MMOs **should** conduct such assessments iaw the applicable requirements^{2, 9}.

Additional AMC – AMOs only

38. Qualification assessment means collecting copies of all documents that attest to qualification, such as the licence and / or any Authorization held. This **should** be followed by a confirmation check with the organization(s) that issued such document(s) and finally a comparison check for differences between the product type ratings on the qualification documents and the relevant product types maintained by the organization. This latter point may reveal a need for additional training to cover any differences in product type.

⁹ Refer to RA 4806(5): Personnel Competences and Authorization (MRP 145.A.30(e)).

¹⁰ Refer to RA 4807(10): Record of Staff (MRP 145.A.35(j)).

**Guidance
Material
4807(6)**

Certifying Staff Competence Assessment (MRP 145.A.35(f))

Common GM

39. The requirement of this Regulation for a Competence assessment of ► **Coordinating / Certifying Staff** ◀ is in addition to the Competence assessment⁹ applicable to all personnel involved in any Maintenance, management and / or Quality Audits.

Additional GM – MMOs only

40. Nil.

Additional GM – AMOs only

41. Competence and capability may be assessed by working the person under the supervision of either another ► **Coordinating / Certifying Staff** ◀ person or a Quality Auditor for sufficient time to arrive at a conclusion. Sufficient time could be as little as a few weeks if the person is fully exposed to relevant work. It is not required to assess against the complete spectrum of intended duties.

42. When the person has been recruited from another Maintenance organization approved under MRP Part 145, and was ► **Coordinating / Certifying Staff** ◀ in that organization, then the receiving organization may accept a written confirmation from the person responsible for running the Quality System about the person.

**Regulation
4807(7)**

Issue of Certification Authorization (MRP 145.A.35(g))

4807(7) When the conditions of RA 4807 – Certifying Staff and Support Staff Sub-Regulations (1) to (4) and (6) (MRP 145.A.35(a) to (d) and (f)) have been fulfilled by the certifying staff, the organization **shall** issue a Certification Authorization that clearly specifies the scope and limits of such Authorization.

**Acceptable
Means of
Compliance
4807(7)**

Issue of Certification Authorization (MRP 145.A.35(g))

43. Continued validity of the Certification Authorization **should** be dependent upon continued compliance with this Regulatory Article.

**Guidance
Material
4807(7)**

Issue of Certification Authorization (MRP 145.A.35(g))

44. Nil.

**Regulation
4807(8)**

Certification Authorization Codes (MRP 145.A.35(h))

4807(8) The Certification Authorization **shall** be in a style that makes its scope clear to the ► **Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀ and any person who **shall** be required to examine the Authorization. Where codes are used to define scope, the organization **shall** make a code translation readily available.

**Acceptable
Means of
Compliance
4807(8)**

Certification Authorization Codes (MRP 145.A.35(h))

Common AMC

45. Nil.

Additional AMC – MMOs only

46. MMOs **should** adopt a common system of Authorization(s) to provide their personnel the authority to carry out engineering tasks and sign Maintenance documentation once assessed as Competent.

Acceptable Means of Compliance 4807(8)

Additional AMC – AMOs only

47. Nil.

Guidance Material 4807(8)

Certification Authorization Codes (MRP 145.A.35(h))

Common GM

48. Nil.

Additional GM – MMOs only

49. The benefit of using a common system of Authorization is to provide universally recognisable Authorization codes that can support in-Service ► **Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀ being employed across each Command. Such a common Authorization system will be strictly controlled, with any deviation appropriately managed by the Commands.

Additional GM – AMOs only

50. Nil.

Regulation 4807(9)

Responsibility for Issuing Certification Authorization (MRP 145.A.35(i))

4807(9) Certification Authorizations **shall** be issued in a controlled manner. For AMOs, the person responsible for the Quality System **shall** also remain responsible on behalf of the organization for issuing Certification Authorizations to certifying staff. Such person may nominate other persons to actually issue or revoke the Certification Authorizations iaw a procedure as specified in the MOE.

Acceptable Means of Compliance 4807(9)

Responsibility for Issuing Certification Authorization (MRP 145.A.35(i))

Common AMC

51. Nil.

Additional AMC – MMOs only

52. The delegation of Authorizations¹¹ within an MMO **should** be controlled by a nominated person to retain oversight of the Authorization issued, reviewed and, where necessary, revoked.

Additional AMC – AMOs only

53. Nil.

Guidance Material 4807(9)

Responsibility for Issuing Certification Authorization (MRP 145.A.35(i))

54. Nil.

Regulation 4807(10)

Record of Staff (MRP 145.A.35(j))

4807(10) The organization **shall** maintain a record of all ► **Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀. The record **shall** be retained by the organization for at least 2 years after any individual has ceased employment

¹¹ Refer to RA 1006 – Delegation of Engineering Authorizations.

**Regulation
4807(10)**

with the organization, or from when the Authorization has been withdrawn. The staff records **shall** contain:

- (a) Details of any Aircraft Maintenance licence held.
- (b) All relevant training completed.
- (c) The scope of the Certification Authorizations issued, where relevant.
- (d) Particulars of staff with limited or one-off Certification Authorizations.

**Acceptable
Means of
Compliance
4807(10)**

Record of Staff (MRP 145.A.35(j))

Common AMC

55. Nil.

Additional AMC – MMOs only

56. Nil.

Additional AMC – AMOs only

57. The following minimum information as applicable **should** be kept on record in respect of each certifying person:

- a. Name.
- b. Date of Birth.
- c. Basic Training.
- d. Type Training.
- e. Continuation Training.
- f. Experience.
- g. Qualifications relevant to the Authorization.
- h. Scope of the Authorization.
- i. Date of first issue of the Authorization.
- j. If appropriate - expiry date of the Authorization.
- k. Identification Number of the Authorization.
- l. Security clearance, where applicable.

58. The record **should** be controlled by the organization's Quality department. This does not mean that the Quality department runs the record system.

59. Persons authorized to access the system **should** be maintained at a minimum to ensure that records cannot be altered in an unauthorized manner or that such confidential records become accessible to unauthorized persons.

60. In the case of an Approval based on one person using a subcontracted Quality monitoring arrangement, the requirement for a record of certifying and support staff is satisfied by the submission to and acceptance by the MAA of the MAA Form 4¹². With only one person, the requirement for a separate record of Authorization is unnecessary because the MAA Approval Schedule defines the Authorization. Where applicable, an appropriate statement to reflect this situation **should** be included in the MOE.

¹² The MAA Form 4 can be found on the MAA website, within the Approvals section, at the following link: <https://www.gov.uk/government/publications/maintenance-approved-organization-scheme-maas>.

**Guidance
Material
4807(10)**

Record of Staff (MRP 145.A.35(j))

Additional GM – AMOs only

61. The record may be kept in any format.

**Regulation
4807(11)**

Provision to Staff of a Copy of Their Authorizations (MRP 145.A.35(k))

4807(11) Personnel **shall** be given a copy of their Authorizations, where applicable.

**Acceptable
Means of
Compliance
4807(11)**

Provision to Staff of a Copy of Their Authorizations (MRP 145.A.35(k))

62. The organization **should** either provide staff with a copy of their Authorizations (including copies of any subsequent Authorizations) in hard copy or provide access to their Authorizations by issuing a personal account for an approved Information System, where used to retain such records.

**Guidance
Material
4807(11)**

Provision to Staff of a Copy of Their Authorizations (MRP 145.A.35(k))

63. Nil.

**Regulation
4807(12)**

Requirement to Produce Certification Authorization (MRP 145.A.35(l))

4807(12) ► **Tradespersons, Supervisors and Coordinating / Certifying Staff** ◀ or, where applicable, the organization, **shall** produce their Certification Authorization to the MAA within 24 hours of request.

**Acceptable
Means of
Compliance
4807(12)**

Requirement to Produce Certification Authorization (MRP 145.A.35(l))

64. Nil.

**Guidance
Material
4807(12)**

Requirement to Produce Certification Authorization (MRP 145.A.35(l))

65. Nil.

**Regulation
4807(13)**

Minimum Age of Certifying Staff (MRP 145.A.35(m))

4807(13) Withdrawn – Not deemed regulatory material.

**Acceptable
Means of
Compliance
4807(13)**

Minimum Age of Certifying Staff (MRP 145.A.35(m))

66. Withdrawn – Not deemed regulatory material.

**Guidance
Material
4807(13)**

Minimum Age of Certifying Staff (MRP 145.A.35(m))

67. Withdrawn – Not deemed regulatory material.