



Aeronautical Services
Advisory Memorandum
(ASAM)
Focal Point: ANSP

ASAM
No: 36
Issue 3
Date 17.10.2024

Title

Changes to an Air Traffic Controller (ATCO) Training Organisation

1 Introduction

1.1 This material outlines the process to enable a training organisation to implement a change with or without prior competent authority approval in accordance with the regulatory requirements of Part ATCO.OR.B.015 and ATCO.AR.E.010 of Commission Regulation (EU) 2015/340.

1.2 Scope

The Irish Aviation Authority (IAA) is the competent authority for the State of Ireland with the responsibility for the certification and oversight of persons and organisations subject to Commission Regulation (EU) 2015/340 and pursuant to Regulation (EU) 2018/1139.

This ASAM should be read in conjunction with S.Notice No. 37 and applies to all training organisations certified by the competent authority involved in the training and assessment of student air traffic controllers and air traffic controllers.

Changes to course material for Initial, Unit and Continuation training are not included within the scope of this process of organisational change. These changes are addressed through separate CA processes, which are published under specific regulatory S Notices and ASAMs. Hereunder is a link to the IAA website where these can be found;

[S Notices and ASAMs.](#)

1.3 Responsible Person

The Manager of Air Navigation Services Division has overall responsibility for this advisory material.

2 References

- 2.1 Regulation (EU) 2018/1139,
- 2.2 Commission Regulation (EU) 2015/340
- 2.3 Commission Implementing Regulation (EU) 2023/893,
- 2.4 ICAO Annex 1
- 2.5 S Notice No. 37

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3 Changes requiring prior approval

- 3.1 In accordance with ATCO.OR.B.015, the following change shall require prior approval before their implementation, unless such a change is notified and managed in accordance with a procedure approved by the competent authority as laid down in point ATCO.AR.E.010(c):
- (1) a change affecting the scope of the certificate; or
 - (2) the terms of approval of the training organisation; or
 - (3) a change affecting any relevant element of the training organisation's management systems.
- 3.2 With respect to Section 3.1 hereunder are changes that may affect the certificate or the terms of approval of the training organisation or the training organisation's management system and require prior CA approval:
- (1) change to the name of the training organisation;
 - (2) change of legal entity;
 - (3) the training organisation's principal place of operation;
 - (4) the training organisation's type(s) of training;
 - (5) additional locations of the training organisation;
 - (6) the accountable manager;
 - (7) for any changes to the training organisation's procedure describing how changes not requiring prior approval will be managed and notified to the competent authority
 - (8) changes to Unit Competence Scheme (UCS) or Unit Training Plans (UTP) manuals.
 - (9) Unless otherwise agreed with the competent authority and documented as such; any changes to personnel specified in Annex III (Part ATCO.OR) that may affect the certificate, or the training approval attached to it, requires prior competent authority approval;
 - (10) Unless otherwise agreed with the competent authority and documented as such; the training organisation's documentation as required by Subpart ATCO.OR.C on safety policy and procedures, requires prior competent authority approval;
 - (11) Unless otherwise agreed with the competent authority and documented as such; any changes to the organisations facilities requires prior competent authority approval.
- 3.3 For any changes requiring prior approval in accordance with point 3.1 and 3.2 the training organisation shall apply using the form at appendix A to this ASAM **no later than 6 weeks (30 working days) in advance of the proposed change** to the competent authority at atstraining@iaa.ie. An organisation may use its own change form which is agreed with the competent authority and forms part of that organisations management system.

- 3.4 Training organisations shall provide the competent authority with all relevant documentation affected by the change. The most recent version of the training organisation's compliance matrix, OPS.ANS.F.214, which assists in tracking organisational compliance with regulatory requirements, shall be updated where appropriate and forwarded to the competent authority. When a management/organisational document is changed, it shall be submitted, clearly indicating where the change(s) have been made, and the excel sheet titled 'Doc list' in the compliance matrix OPS.ANS.F.214 shall be updated accordingly.
- 3.5 Therefore, the competent authority shall receive from the training organisation;
- (1) The form at Appendix A (or an organisational form as agreed with the competent authority)
 - (2) Each management system document that is amended, and
 - (3) An updated OPS.ANS.F.214 (OPS.ANS.F.216 for a UTP or OPS.ANS.F.217 for a UCS) if its required to be updated because of the change.
- 3.6 In accordance with ATCO.AR.E.010, the change shall only be implemented upon receipt of formal written approval by the competent authority (Section 4.5 hereunder refers).
- 3.7 Training organisations shall operate under the conditions prescribed by the competent authority during such changes, unless the competent authority determines that the change cannot be implemented.
- 3.8 Changes to the elements referred to in Section 3.1 due to unforeseen circumstances shall be notified to the competent authority without delay to obtain approval as necessary.
- 3.9 Training organisations shall notify the competent authority when they cease their activities.

4 Action by the competent authority for changes requiring prior approval

- 4.1 The competent authority shall acknowledge receipt of the proposed change within 10 working days of notification. The competent authority will conduct a review commensurate with the complexity of the change. If the request for change submission is complete the competent authority will inform the training organisation as soon as is practicable that the change may be implemented.
- 4.2 If the submission for proposed change is lacking or requires action on behalf of the training organisation this will be relayed as soon as practicable by the competent authority and could affect the planned implementation of the change.
- 4.3 The competent authority may not allow a change to proceed until it is satisfied that it can proceed safely and in compliance with the regulatory requirements.
- 4.4 The competent authority may prescribe the conditions under which the training organisation may operate during such changes, which may include allowing the organisation to make a partial change whilst the regulatory review is ongoing.
- 4.5 Depending on the change the approval may take the form of a new or amended certificate, a new or amended approval letter, or an electronic mail, setting out terms of approval if appropriate.
- 4.6 In accordance with ATCO.AR.C.001 the competent authority may, as part of the change process, conduct audits and inspections including, as appropriate, unannounced inspections of the training organisation prior to, during and/or after implementation of a change.
- 4.7 Without prejudice to any additional enforcement measures in accordance with ATCO.AR.E.015, when the organisation implements changes requiring prior approval without having received the

competent authority's approval as defined in point (a) of ATCO.AR.E.010, the competent authority shall take immediate and adequate action.

- 4.8 If the competent authority finds that the holder of a certificate no longer satisfies the requirements or conditions of that certificate, it shall take appropriate measures, which may include revocation of the certificate.

5 Changes not requiring prior approval

- 5.1 In accordance with ATCO.AR.E.010; all changes not requiring prior approval shall be managed and notified to the competent authority, at a minimum in line with this ASAM and/or where agreed with the competent authority as defined in that organisations procedures.
- 5.2 The minimum notification period to inform the competent authority prior to commencing a change is **2 weeks (10 working days) in advance** to atstraining@iaa.ie.
- 5.3 The CA shall receive from the training organisation;
- (1) Appendix A to ASAM 36 (or as agreed with the COMPETENT AUTHORITY)
 - (2) Each management system document that is amended, and
 - (3) An updated OPS.ANS.F.214 if its required to be updated because of the change.
- 5.4 The competent authority will acknowledge receipt of the notification in the form of an automated email response. The organisation shall keep a copy of this email as evidence of notification to the COMPETENT AUTHORITY. Each email has a time and date, so it should correspond to the date and approximate time of the organisations submission.
- 5.5 The organisation may plan to implement the change once it has received the automated email for the date (or thereafter) as specified in the Change Notification submitted.
- 5.6 If for some reason it doesn't receive the automated email the TO should contact an ANSD Inspector directly for a response. The Inspector shall reply within 10 working days from the date he/she receives the notification. The change should not take place until a response is received.
- 5.7 In its continuous oversight process the competent authority may assess the information provided in the notification to verify whether actions taken comply with the approved procedures and applicable requirements. Where warranted the CA may request further information or detail of the change.
- 5.8 The competent authority reserves the right to carry out a review of those changes not requiring prior approval and may not allow a change to proceed until it is satisfied that it can proceed safely and in compliance with the regulatory requirements. If such a case arises the competent authority will inform the TO as soon as practicable but no later than 10 working days from receipt of the submission.
- 5.9 The competent authority may prescribe the conditions under which the training organisation may operate during such changes, which may include not allowing the organisation to make the change or only make a partial change whilst the regulatory review is ongoing.

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6 Summary: Appendix A and changes

A notification of a planned change shall be submitted by a training organisation, before any such change takes place whether prior approval is required or not, using the form at Appendix A. This is to enable the competent authority to determine a TOs continued compliance with Regulation (EU) No 2018/1139 and its Implementing Rules and to amend, if necessary, the organisation's certificate and any related terms of approval attached to it.

Changes requiring Prior Approval: submit 6 weeks (30 working days) in advance
Hereunder are changes that may affect the certificate or the terms of approval of the training organisation or the training organisation's management system and require prior competent authority approval:
<ul style="list-style-type: none">(1) change to the name of the training organisation;(2) change of legal entity;(3) the training organisation's principal place of operation;(4) the training organisation's type(s) of training;(5) additional locations of the training organisation;(6) the accountable manager;(7) for any changes to the training organisation's procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.(8) changes to Unit Competence Scheme (UCS) or Unit Training Plans (UTP) manuals.(9) <u>Unless otherwise agreed with the competent authority</u>; any changes to personnel specified in Annex III (Part ATCO.OR) that may affect the certificate, or the training approval attached to it, requires prior competent authority approval;(10) <u>Unless otherwise agreed with the competent authority</u> and documented as such; the training organisation's documentation as required by Subpart ATCO.OR.C on safety policy and procedures, requires prior competent authority approval;(11) <u>Unless otherwise agreed with the competent authority</u> and documented as such; any changes to the organisations facilities requires prior competent authority approval.
All other changes: submit 2 weeks (10 working days) in advance
Unless specified by the competent authority all other changes <u>do NOT</u> require prior approval but must be notified before implementation.

7 Further Information

Any queries or requests for further information should be addressed to the following competent authority email address: atstraining@iaa.ie

APPENDIX A TO ASAM NO. 36

NOTIFICATION OF A PROPOSED CHANGE TO A TRAINING ORGANISATION
IN ACCORDANCE WITH REGULATION (EU) 2015/340 ATCO.OR.B.015

Type of notification:	
<input type="checkbox"/> Prior approval is <u>not</u> required	(minimum 2 weeks (10 working days) in advance)
<input type="checkbox"/> Prior approval is required	(minimum 6 weeks (30 working days) in advance)

Organisation Details:	
Certificate no:	
Name of org.:	
Address:	
Country:	

Primary Contact person for this notification:	Change sponsor or Secondary Contact:
Title:	
Name:	
Phone:	
E-mail	

Title for this change:

Proposed date for the introduction of the change:

Description of why this change is required:

Description of the change:

Impact of change:
Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, outline hereunder what the impact is and the plan to manage that impact:

Attachments to this notification:
Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, list hereunder relevant documentation and attach to your email submission:
1.
2.
3.
4.