

	<p style="text-align: center;">Aeronautical Services</p> <p style="text-align: center;">Advisory Memorandum</p> <p style="text-align: center;">(ASAM)</p> <p style="text-align: center;">Focal Point: ANSP/TO</p>	<p>ASAM</p> <p>No: 33</p> <p>Issue 8.0</p> <p>Date 17.10.2024</p>
<p>Title</p>	<p>Guidance on Air Traffic Controller Unit and Continuation training course approval.</p>	

1 Introduction

- 1.1** Persons and organisations involved in the training of student air traffic controllers and air traffic controllers are legally required to comply with Regulation (EU) 2018/1139 and Commission Regulation (EU) 2015/340 of 20 February 2015 *laying down technical requirements and administrative procedures relating to air traffic controllers' licences and certificates pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council, amending Commission Implementing Regulation (EU) No 923/2012 and repealing Commission Regulation (EU) No 805/2011.*
- 1.2** In accordance with ATCO.AR.A.010(h), *The tasks of the competent authorities shall include:*
- (h) the approval of training courses, training plans and unit competence schemes, as well as assessment methods;*
- 1.3** Accordingly, all courses within the scope of Commission Regulation (EU) 2015/340 for the training of student air traffic controllers and air traffic controllers require regulatory approval.

2 Objective

The objective of this material is to give guidance on when a training organisation is required to seek Competent Authority (CA) approval for courses of ATCO training at an Air Traffic Control Unit level.

3 Scope

- 3.1** The Irish Aviation Authority (IAA) is the CA for Ireland regarding Regulation (EU) 2018/1139, and Commission Regulation (EU) 2015/340.
- 3.2** This guidance material applies to all training organisations certified by the CA of Ireland involved in the training of student ATCOs and ATCOs.

4 References

- (a) Regulation (EU) 2018/1139
- (b) Commission Regulation (EU) 2015/340
- (c) Commission Implementing Regulation (EU) 2023/893
- (d) ICAO Annex 1
- (e) S Notice No.29

5 Requirements

5.1 Approval

An ATCO course of training can be CA approved in one of three ways:

- (a) Assessed as part of a training organisations certification in accordance with Regulation (EU) 2018/1139 and Commission Regulation (EU) 2015/340 (listed on a Certificate schedule).
- (b) Assessed as part of an initial or renewal of an ATC Unit Training Plan (UTP) or Unit Competence Scheme (UCS).
- (c) Assessed on an individual course by course basis which will receive an individual regulatory letter of course approval.

5.2 Re-approval

When a change is made to approved training a separate letter of approval may be warranted depending on the extent of the deviation (para 6.3 below refers).

5.3 Notification Requirements

Irrespective of whether a course has prior regulatory approval or not, **all** courses of ATCO training (unit/continuation) must be notified to the CA prior to its commencement in line with the procedures as outlined in section 6 hereunder to atstraining@iaa.ie

6 PROCEDURES

6.1 A training course not under CA approval.

- 6.1.1 Where a course does not have CA approval, it is the ATC unit's responsibility to notify the CA that it intends to conduct a course of training and to seek a CA letter of course approval. Notification may be sent on behalf of an ATC Unit by another CA approved training organisation. However, the ATC Unit is always responsible for the conduct of a course and its content, so it must review and approve it prior to being submitted for CA approval.

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- 6.1.2 A '**Notice of Intention**' (included as an appendix to this ASAM) to commence a course of training must be sent to the CA in sufficient time for CA review, comment and to allow for Unit follow up if required.
- 6.1.3 This '**Notice of Intention**' should be accompanied by all supporting documentation inclusive of one or more of the following:
- (a) Training Needs Analysis {TNA} (to include a gap analysis where appropriate)
 - (b) Syllabus
 - (c) Training Event Plans {TEPs}
 - (d) Timetable.
- 6.1.4 The minimum notification period to inform the CA prior to commencing a course is **6 weeks** (30 working days) via email to atstraining@iaa.ie.

The '**Notice of Intention**' includes the following information:

- 1) **Unit Name of Course** (e.g. Dublin Approach Radar)
 - 2) **The start and end dates** (calendar dates)
 - 3) **List of Learners** (names, licence details and/or ATCO qualifications)
 - 4) **List of Instructors** (names, qualifications and experience. These may be referenced as opposed to listing.)
 - 5) **Certificate number or copy of approval letter** (provide certificate number for training approved under the UTP/UCS or a copy of the approval letter for other training)
 - 6) **Differences from previously approved course** (if course was previously approved and changes were made; outline the changes)
 - 7) **Duration of training course** (in working weeks or days or hours)
 - 8) **The type of course** (examples; unit endorsement course, or refresher training or conversion training)
 - 9) **The location** (where conducted and any off-site locations)
 - 10) **The methodology used to establish details of the content** (A TNA or other such method. Also see Eurocontrol Specification for the ATCO Common Core Content Initial training paragraph titled 'References'. This lists references to material which should be considered when establishing the methodology as per above).
 - 11) **Syllabus Details** (Title of Syllabus, version, and issue date)
 - 12) **Organisation** (The certified training organisation delivering the approved training or part thereof.)
 - 13) **The required examinations and/or assessments** (the number and type of examinations including pass mark. The number and type of assessments).
 - 14) **Appeals** (the internal organisation mechanism for learner appeals. Also, the method for informing the CA).
- 6.1.5 If the training organisation maintains a separate attendance record, the list of learners' names does not have to be provided in the initial notice of intention for continuation training. Learners' qualifications and/or licencing requirements which are a prerequisite to commencing the training, should be provided in the initial notice of intention.

- 6.1.6 After the initial notice of intention submission, if there is an amendment to the list of instructors, the training organisation shall provide an updated notice of intention, no later than ten working days following completion of the course.
- 6.1.7 All rows should be filled in with either a textual description or a reference to where the information is contained e.g., within a Unit's UTP/UCS or syllabus, stating the document version, date, section, and page numbers as applicable. Where a row is not required to be filled in, insert text 'not applicable' or 'Nil'.

6.2 A training course which has CA Approval.

- 6.2.1 Where a course has been approved under the UTP/UCS or the Training Organisation's certificate (as per para 5.1) an individual approval letter is not required, and the course may commence under the existing approval.
- 6.2.2 However before the commencement of a course a shortened '**Notice of Intention**' is still required to be sent to the CA, with rows 1 to 5 filled in:
- 1) **Unit Name of Course** (e.g. Dublin Approach Radar)
 - 2) **The start and end dates** (calendar dates)
 - 3) **List of Trainees** (names, licence requirements)
 - 4) **List of Instructors** (names, qualifications, and experience)
 - 5) **Certificate number or copy of approval letter** (UTP/UCS cert number or approved syllabus with version & date)
- 6.2.3 The minimum notification period to inform the CA prior to commencing a course is **2 weeks** (10 working days) via email to atstraining@iaa.ie.
- 6.2.4 If the training organisation maintains a separate attendance record, the list of learners' names does not have to be provided in the initial notice of intention for continuation training. Learners' qualifications and/or licencing requirements which are a prerequisite to commencing the training, should be provided in the initial notice of intention.
- 6.2.5 After the initial notice of intention submission, if there is an amendment to the list of instructors, the training organisation shall provide an updated notice of intention, no later than ten working days following completion of the course.
- 6.2.6 Following receipt of the initial notice of intention the CA may request one or more of the following documents as part of its ongoing oversight of training:
- (a) Training Needs Analysis {TNA} (to include a gap analysis where appropriate)
 - (b) Syllabus
 - (c) Training Event Plans {TEPs}
 - (d) Timetable

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- 6.2.7 If it's found that these documents are not complete or correct to the extent that it may affect compliance or the structure of a course, the CA may take whatever action is necessary. This action may include:
- (a) a request for further information or clarity;
 - (b) request changes or additions to material (which may require a course to extend);
 - (c) suspend the commencement of a course;
 - (d) temporarily halt a course; or
 - (e) withdraw the approval until it is satisfied that any required remedial action is completed.
- 6.2.8 Where the CA suspends, temporarily halts or withdraws an approval it shall inform the training organisation/ATC Unit by email.
- 6.2.9 Following a satisfactory resolution to the identified issues, the CA will confirm that the course can commence or recommence as the case may be.
- 6.2.10 Confirmation of CA agreement to proceed must be electronically obtained by the Unit prior to (re) commencement of training and retained as part of the course documentation.

6.3 A training course which will differ from a previous CA Approval

- 6.3.1 If an organisation wishes to make changes to a CA approved course or to make a change to a condition of CA approval, then depending on the extent of the change re-approval maybe required. The ATC Unit (or third party) will submit
- (a) A '**Notice of Intention**' to differ from an already approved course of training.
 - (b) All documentation which will be changed clearly identifying within each the change that has occurred.
 - (c) An assessment of the impact of the change.
- 6.3.2 Small administrative and formatting changes do not require re-approval (or notification to the CA) but all must be recorded and held by the ATC unit on its register of change.
- 6.3.3 Whenever doubt exists as to whether a change requires regulatory approval the ATC Unit, or training organisation acting on its behalf, should consult with the CA in sufficient time before the change is made.
- 6.3.4 Following CA review a Unit/TO will:
- (a) Be notified that the course can commence under the current approval; or
 - (b) Be notified that the deviation is such that the CA has to issue a new letter of approval prior to the commencement of the course.
- 6.3.5 The minimum notification period to inform the CA prior to commencing a course is **6 weeks** (30 working days) via email to atstraining@iaa.ie

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6.4 Exceptional circumstances - The commencement of training without CA approval

- 6.4.1 The CA would uphold that all practicable efforts are made to gain pre-course approval prior to the commencement of any training. But the CA also recognises a balance is required between the operational need and the time it takes the administrative process to complete (Unit to CA and vice versa). This is especially so for post occurrence incident training where sometimes time is of the essence because the confidence of a controller could be adversely affected by a delay. This has to be judged against due care and attention being given to design an appropriate structured training course (especially in cases where an ATCOs confidence could be or is affected).
- 6.4.2 In recognition of the above a case can be made where a letter of CA approval cannot be issued prior to the commencement of a course. The following process 1-7 applies;
1. **Notification of Intention** (using the appendix to this ASAM) shall be sent to the CA by the operations manager or a person nominated by the ATC unit at an appropriate management grade/position outlining the case/reasons for the requirement to commence training prior to the receipt of a CA letter of approval. This request will signify that the remaining conditions hereunder will be adhered to.
 2. The **Notification of Intention** will be accompanied or followed by the course TNA and Syllabus prior to commencement of training. The Training Event Plans and timetable may be submitted during or immediately after training.
 3. The CA will carry out an initial overview of the proposed training so as to base a judgement that an appropriate structure of training is in place. This will allow the training to proceed before a full review will be carried out and the letter of approval issued.
 4. Confirmation of CA agreement to proceed must be electronically obtained by the Unit prior to commencement of training and retained as part of the course documentation.
 5. Following a full review, if the course material meets regulatory requirements, the CA will issue a letter of approval post training but prior to the person recommencing duties (see point 7).
 6. If, however following regulatory review further training is required/needs revision then allowance on the Units part must be made to cater for this as part of the fall back from this process.
 7. The letter of approval (as with successful completion of training) **shall** be a prerequisite before the person can recommence duties. This should be adopted and documented under appropriate Unit procedures.
- 6.4.3 Whilst allowing flexibility to the Unit this is a measure to ensure the CA has some approval control before the candidate is returned to operational duties. This will protect the candidate and ATC to ensure in the aftermath of an occurrence due consideration and appropriate process has been afforded to the corrective/refresher training required.

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7 Training on behalf of an ATC Unit

- 7.1** If an ATC unit decides to engage a third-party training organisation to provide elements of their training (i.e. Unit /Continuation) then a true copy of that Training Organisation's certificate, issued under appropriate European Commission regulation, must be submitted with the above if required by the CA. Irrespective the ATC unit must only engage training organisations which they have concluded a specific agreement with.
- 7.2** Irrespective of what elements of training a third-party training organisation is employed to provide, the ATC Unit is responsible for the content and conduct of training. It is imperative that the ATC Unit undertakes due diligence and satisfies itself that the training is always in compliance with extant ICAO Standards and Recommended Practices, European Regulations and National legal requirements.

8 Further Information

- 8.1** For Air Traffic Control Officer (ATCO) training course submissions, Notices of Intention (NoI) to conduct training or general training course enquiries please email the CA at atstraining@iaa.ie .
- 8.2** In respect to a training course which has CA approval, the automatic reply received by the submitting entity to their 'Notice of Intention' email serves as a record to be retained by the training organisation that it has notified the Competent Authority (CA) accordingly.

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Notice of Intention

To conduct an ATCO training course at the Unit level

Where a course **has been** previously approved the 'Notice of Intention' checklist table hereunder is required to be sent to the CA with the requirements (1 to 5) filled in prior to the commencement of a course (min 2 weeks).

Where a course has **NOT** been previously approved a 'Notice of Intention' to commence a course of training with the information outlined in all points (1 to 14) must be sent to the CA in sufficient time to allow for CA review, comment and Unit follow up if required prior to commencement of the course (min 6 Weeks).

Note – All rows on the right shall be filled with either a textual description or a reference to where the information is contained e.g. within a Unit's UTP/UCS or syllabus etc. stating section and page numbers. Where a row is not required to be filed in, insert text 'not applicable' or 'Nil'.

No	Requirement	Description or reference to chapter/section /paragraph/page in UTP/UCS, syllabus or other document
1	Unit Name of Course <i>(e.g. Dublin Approach Radar)</i>	
2	The start and end dates <i>(calendar dates)</i>	
3	List of Learners (A. names and (B. Licence details and/or ATCO qualifications.) <i>Note: See section 6.1.5 or 6.2.4 for additional options for continuation training</i>	
4	List of Instructors (A. names, (B. qualifications and (C. experience	
5	Certificate number or copy of approval letter <i>(if the course has previously been approved under UTP/UCS, or a syllabus, include the document name, version & issue date, or provide the approval letter)</i>	

No	Requirement	Description or reference to chapter/section /paragraph/page in UTP/UCS, syllabus or other document
6	<p>If there is a difference from a course previously approved please outline that difference.</p>	
7	<p>Duration of training course <i>(in working weeks or days or hours)</i></p>	
8	<p>The type of course (A. ADC; APP: APS; ACS;OJT), (B. plus rating endorsement training if applicable.)</p>	
9	<p>The location (A. where conducted and (B. any off site locations)</p>	
10	<p>The methodology used to establish details of the content (A. TNA or other such method.</p> <p><i>(See Eurocontrol Specification for the ATCO Common Core Content Initial training paragraph titled 'References' {pg 23/24}. This lists references to material which should be considered when establishing the methodology as per above.)</i></p>	
11	<p>Syllabus Details (Title of Syllabus, version, and issue date)</p>	

No	Requirement	Description or reference to chapter/section /paragraph/page in UTP/UCS, syllabus or other document
12	<p>Organisation (The certified training organisation delivering the approved training or part thereof.)</p>	
13	<p>The way examinations or assessments are organised (A. how many of either will be conducted broken down for each module; and (B. the pass mark required for each; and (C. the re-sit criteria.</p>	
14	<p>Appeals (A. the mechanism for trainee/student appeals. Also (B. the method for informing the CA.</p>	