

Compliance matrix for Training Organisations – Regulation (EU) 2015/340

Requirements	Action required: 1 – Not relevant or no action required for this. To be notified 2 – Specify in attached document 3 – Reference(s) to SMS 4 – Explanation	Applicant 1 2 - Attachment no. 3 - References 4 - Explanation FC - Fully compliant PC - Partly compliant NC - Not compliant
Annex III PART ATCO.OR requirements for air traffic controller training organisations and aero-medical centres SUBPART A – General requirements ATCO.OR.A.001 Scope This Part, set out in this Annex, establishes the requirements applicable to air traffic controller training organisations and aero-medical centres in order to obtain and maintain a certificate in accordance with Regulation (EC) No 216/2008 and this Regulation.	1 Fill out 216/2008 compliance matrix for relevant parts. Fill out 2015/340 compliance matrix Annex III relevant parts (this document), and matrix for relevant training program	
SUBPART B — Requirements for air traffic controller training organisations ATCO.OR.B.001 Application for a training organisation certificate (a) Applications for a training organisation certificate shall be submitted to the competent authority in due time to allow the competent authority to evaluate the application. The application shall be submitted in accordance with the procedure established by that authority. (b) Applicants for an initial certificate shall demonstrate to the competent authority how they will comply with the requirements established in Regulation (EC) No 216/2008 and in this Regulation. (c) An application for a training organisation certificate shall include the following information: (1) the applicant's name and address; (2) the address(es) of the place(s) of operation (including, where relevant, the list of ATC units) if different from the applicant's address in point (a); (3) the names and contact details of: (i) the accountable manager;	2-3-4 (a) See GM from CA (b)(c) Fill out the application form with the required information	



 (ii) the head of the training organisation, if different from point (i); (iii) the person(s) nominated by the training organisation as the focal point(s) for communication with the competent authority; (4) date of intended start of activity or change; (5) a list of types of training to be provided and at least one training course from each type of training that is intended to be provided; (6) the declaration of compliance with the applicable requirements shall be signed by the accountable manager, stating the training organisation's compliance with the requirements at all times; (7) the management system processes; and (8) the date of application. 		
GM1 ATCO.OR.B.001(c)(2) Application for a training organisation certificate The requirement to add the list of ATC units is not relevant in the case of training organisations which provide initial training only.	1	
ATCO.OR.B.005 Means of compliance (a) Alternative means of compliance to the AMC adopted by the Agency may be used by an organisation to establish compliance with Regulation (EC) No 216/2008 and with this Regulation. (b) When an organisation wishes to use an alternative means of compliance, it shall, prior to implementing it, provide the competent authority with a full description of the alternative means of compliance. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating compliance with Regulation (EC) No 216/2008 and its implementing rules. (c) The organisation may implement these alternative means of compliance subject to prior approval by the competent authority and upon receipt of the notification as prescribed in ATCO.AR.A.015(d).	1-2 See GM if planning to use alternative means of compliance. Prior approval required. Safety (risk) assessment required.	
AMC1 ATCO.OR.B.005 Means of compliance Demonstration of compliance In order to demonstrate that the Implementing Rules are complied with, a safety (risk) assessment should be completed and documented. The result of this safety (risk) assessment should demonstrate that an equivalent level of safety to that established by the Acceptable Means of Compliance (AMC) adopted by the Agency is reached.	See above	
ATCO.OR.B.010 Terms of approval and privileges of a training organisation certificate (a) Training organisations shall comply with the scope and privileges defined in the terms of approval attached to the organisation's certificate. (b) In order to ensure that the applicable requirements in Subpart D of Annex I (Part ATCO) are fulfilled, the privilege to provide unit and continuation training shall only be granted to training organisations which: (1) hold a certificate for the provision of the air traffic control service; or (2) have concluded a specific agreement with the ATC provider.	(b)(1)(2): 2-3-4	



AMC1 ATCO.OR.B.010(a) Terms of approval and privileges of a training organisation certificate The management system documentation should contain the privileges and detailed scope of activities including the contracted ones for which the training organisation is certified, as relevant to this Regulation.	3 Give ref to management system	
GM1 ATCO.OR.B.010(b) Terms of approval and privileges of a training organisation certificate Providing on-the-job training via agreement with the ATC provider The specific agreement should detail the issues of liability and insurance for the provision of air traffic control service during on-the-job training and consider the relevant provisions of ATCO.OR.C.005 in order to ensure conformity of the contracted or purchased activity or part of activity to the applicable requirements as well as those of ATCO.OR.B.040 on occurrence reporting and ATCO.OR.C.025 on funding and insurances.	1	
ATCO.OR.B.015 Changes to the training organisation (a) Changes to the organisation that affect the certificate or the terms of approval of the training organisation or any relevant element of the training organisation's management systems shall require prior approval by the competent authority. (b) Training organisations shall agree with their competent authority on the changes that require prior approval in addition to those specified in point (a). (c) For any changes requiring prior approval in accordance with points (a) and (b), the training organisation shall apply for and obtain an approval issued by the competent authority. The application shall be submitted before any such change takes place in order to enable the competent authority to determine continued compliance with this Regulation and to amend, if necessary, the training organisation certificate and related terms of approval attached to it. Training organisations shall provide the competent authority with all relevant documentation. The change shall only be implemented upon receipt of formal approval by the competent authority in accordance with ATCO.AR.E.010. Training organisations shall operate under the conditions prescribed by the competent authority during such changes, as applicable. (d) Changes to the elements referred to in point (a) due to unforeseen circumstances shall be notified to the competent authority without delay in order to obtain approval as necessary. (e) All changes not requiring prior approval shall be managed and notified to the competent authority as defined in the procedure approved by the competent authority in accordance with ATCO.AR.E.010. (f) Training organisations shall notify the competent authority when they cease their activities.	2-3-4 Information in GM Develop procedure for managing changes: Procedure shall be approved Changes that require prior approval Agreement between TO and CA unforeseen circumstances - Notification required for approval All changes shall be managed and notified to CA	
AMC1 ATCO.OR.B.015 Changes to the training organisation General (a) Training organisations should inform the competent authority of any changes to personnel specified in Annex III (Part ATCO.OR) that may affect the certificate or the training approval attached to it. (b) Training organisations should send to the competent authority each management system documentation amendment. Where the amendment requires the competent authority's approval, the training organisation should receive it in writing.	See above	



GM1 ATCO.OR.B.015 Changes to the training organisation General (a) Examples of changes that may affect the certificate or the terms of approval of the training organisation or the training organisation's management system are listed below: (1) 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) any of the persons referred to in Part ATCO.OR; (8) the training organisation's documentation as required by Subpart ATCO.OR.B on safety policy and procedures; (9) the facilities. (b) Prior approval by the competent authority is required 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.	1	
GM2 ATCO.OR.B.015 Changes to the training organisation Change of name A change of name requires the training organisation to submit a new application as a matter of urgency. Where this is the only change to report, the new application can be accompanied by a copy of the documentation previously submitted to the competent authority under the previous name, as a means of demonstrating how the training organisation complies with the applicable requirements.	1	
ATCO.OR.B.020 Continued validity (a) A training organisation's certification shall remain valid subject to the certificate not being surrendered or revoked and subject to the training organisation remaining in compliance with the requirements of Regulation (EC) 216/2008 and this Regulation, taking into account the provisions related to the handling of findings in accordance with ATCO.OR.B.030. (b) The certificate shall be returned to the competent authority without delay upon its revocation or the cease of all activities.	3-4 Management system shall have in place a monitoring system of compliance () and follow up of findings () See also ATCO.OR.B.030	
ATCO.OR.B.025 Access to training organisations' facilities and data Training organisations and applicants for training organisation certificates shall grant access to any person authorised by or acting on behalf of the competent authority to the relevant premises in order to examine the required records, data, procedures and any other material pertinent to the execution of the tasks of the competent authority.	3-4 Shall be described in the management system	



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ATCO.OR.B.030 Findings After receipt of notification of findings issued by the competent authority in accordance with ATCO.AR.E.015, the training organisation shall: (a) identify the root cause of the finding; (b) define a corrective action plan; and (c) demonstrate the corrective action implementation to the satisfaction of the competent authority within the period agreed with that authority as defined in ATCO.AR.E.015.	2-3-4 (if/when relevant)	
GM1 ATCO.OR.B.030(a);(b) Findings Corrective action plan and root cause (a) Corrective action is the action to eliminate the root cause of a non-compliance in order to prevent its recurrence. (b) Determination of the root cause is crucial for defining effective corrective actions.	1	
GM2 ATCO.OR.B.030(c) Findings Competent authority When reference is made to the competent authority, this means either the competent authority that has issued the certificate or the competent authority ensuring oversight of activities, if they are different, based on the agreement concluded between the authorities.	1	
ATCO.OR.B.035 Immediate reaction to a safety problem The training organisation shall implement any safety measures mandated by the competent authority in accordance with ATCO.AR.C.001(a)(3) for the training organisation activities.	1 2-3-4 (if relevant)	
(a) Training organisations providing on-the-job training shall report to the competent authority, and to any other organisation required by the State of the operator to be informed, any accident, serious incident and occurrence as defined in Regulation (EU) No 996/2010 of the European Parliament and of the Council3 and Regulation (EU) No 376/2014, resulting from their training activity. (b) Reports shall be made as soon as practicable, but in any case within 72 hours of the training organisation identifying the condition to which the report relates, unless exceptional circumstances prevent this. (c) Where relevant, training organisations shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future, as soon as these actions have been identified. (d) Without prejudice to Regulation (EU) No 996/2010 and Regulation (EU) No 376/2014, the reports referred to in points (a), (b) and (c) shall be made in a form and manner established by the competent authority and contain all pertinent information about the condition known to the training organisation.	3-4 Shall be described in the Management system for OJT (TO responsibility)	
GM1 ATCO.OR.B.040 Occurrence reporting The training organisation's report should focus on occurrences taking place during on-the-job training with regard to the training aspects involved. The report may be submitted together with or as an integral part of the report prepared by the air navigation service provider.	1	



SUBPART C — MANAGEMENT OF AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS ATCO.OR.C.001 Management system of training organisations Training organisations shall establish, implement and maintain a management system that includes: (a) clearly defined lines of responsibility and accountability throughout the organisation, including direct safety accountability of the accountable manager; (b) a description of the overall principles of the organisation with regard to safety, referred to as the safety policy; (c) the identification of aviation safety hazards entailed by the activities of the training organisation, their evaluation and the management of associated risks, including actions to mitigate the risk and verify their effectiveness; (d) maintaining personnel trained and competent to perform their tasks; (e) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation; (f) a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; (g) the management system shall be proportionate to the size of the organisation and its activities, taking into account the hazards and associated risks inherent in those activities.	3	
GM1 ATCO.OR.C.001 Management system of training organisations The requirements for the management system of training organisations may be satisfied if the air navigation service provider's management system/safety management system (SMS) specifically covers the requirements of this Regulation.	1	
AMC1 ATCO.OR.C.001(b) Management system of training organisations Safety policy The safety policy should: (a) be endorsed by the accountable manager; (b) clearly identify safety as the highest organisational priority over commercial, operational, environmental or social pressures; (c) include a commitment to: (1) improve towards the highest safety standards; (2) comply with all applicable legal requirements, meet all applicable standards and consider best practices; (3) provide appropriate resources; and (4) enforce safety as the primary responsibility of all managers and staff; (d) be communicated, with visible endorsement, throughout the organisation; (e) include safety reporting and just culture principles; (f) enhance and embed safety culture and safety awareness; and (g) be periodically reviewed to ensure it remains relevant and appropriate to the training organisation.	3	



AMC1 ATCO.OR.C.001(c) Management system of training organisations Identification of aviation safety hazards For training organisations not providing on-the-job training, the hazard identification process may be limited to a demonstration that there are no hazards directly identified. However, the training should be designed so as to ensure future safe operations.	1 (initial training only) 3 (unit/continuation training)	
AMC1 ATCO.OR.C.001(d) Management system of training organisations Personnel A training organisation should demonstrate that: (a) a list of activities with relevant needed competence has been established; (b) their personnel have the relevant competence needed to fulfil the activities they are required to perform; (c) their personnel maintain a level of competence through training as appropriate; (d) their theoretical and practical instructors are qualified in accordance with Part ATCO, Subpart C of this Regulation; (e) their practical instructors either hold an OJTI endorsement or an STDI endorsement; (f) their assessors hold an assessor endorsement; and (g) their synthetic training device instructors and assessors demonstrate knowledge of and receive refresher training in current operational practices.	3-4	
AMC1 ATCO.OR.C.001(e) Management system of training organisations Processes Training organisations should demonstrate that the management system: (a) policies, processes and procedures are monitored to ensure they are current and subject to periodic review and amendment, when necessary, to maintain their continued accuracy and suitability; (b) allows for the impromptu recognition and initiation of improvements to policies, processes and procedures between periodic reviews; (c) controls, records and tracks changes to all of the management system policy, process and procedure documents; (d) includes a master record index that lists all the policies, processes and procedures; and (e) includes as a minimum the following: (1) master record index; (2) training provider certificate; (3) management structure; (4) staff role profiles including accountabilities and responsibilities; (5) training manuals, plans and courses; (6) evidence of regulatory compliance; (7) change control process; (8) safety management manual; (9) course design documents; (10) instructor/assessor qualification and competence records.	3-4	



AMC1 ATCO.OR.C.001(f) Management system of training organisations Compliance monitoring (a) The implementation and use of a compliance monitoring function should enable the training organisation to monitor compliance with the relevant requirements of this Regulation. (b) Training organisations should specify the basic structure of the compliance monitoring function applicable to the activities conducted. (c) The compliance monitoring function should be structured according to the activities of the training organisation to be monitored.	3-4	
GM1 ATCO.OR.C.001(f) Management system of training organisations Example of compliance monitoring system (a) Training organisations may monitor compliance with the procedures they have designed to ensure safe activities. In doing so, they may, as a minimum, and, where appropriate, monitor: (1) the organisational structure; (2) the plans and objectives; (3) the privileges of the organisation; (4) the manuals, logs and records; (5) the training standards; (6) the management system.	1	
 (b) Organisational set-up (1) To ensure that the training organisation continues to meet the requirements of this Regulation, the accountable manager may designate a person responsible for the compliance monitoring function whose role is to verify, by monitoring the activities of the organisation, that the standards required by this Regulation and any additional requirements as established by the organisation are met under the supervision of the relevant head of the functional area. For small training organisations, these identified functions can be fulfilled by the same person. (2) The person designated for the compliance monitoring function should be responsible for ensuring that the compliance monitoring programme is properly implemented, maintained and continually reviewed and improved. (3) The designated person responsible for the compliance monitoring function should: (i) have direct access to the accountable manager; and (ii) have access to all parts of the training organisation and, as necessary, to any contracted organisation. 		
 (c) Compliance monitoring documentation (1) Relevant documentation could include the relevant part(s) of the training organization management system documentation. (2) In addition, relevant documentation could also include the following: (i) terminology; (ii) specified activity standards; (iii) description of the organisation; 		



 (iv) allocation of duties and responsibilities; (v) procedures to ensure regulatory compliance; (vi) compliance monitoring programme, reflecting: (A) schedule of the monitoring programme; (B) audit procedures; (C) reporting procedures; (D) follow-up and corrective action procedures; and (E) recording system; (vii) training elements referred to in paragraph 4(b); and (viii) document control. (d) Training (1) Correct and thorough training is essential to optimise compliance in every training organisation. In order to achieve significant outcomes of such training, the training organisation needs to ensure that all personnel understand the objectives laid down in the organisation's manual. (2) Those responsible for managing the compliance monitoring function should receive training in this task. Such training could cover the requirements of compliance monitoring, manuals and procedures related to the task, audit 		
techniques, reporting and recording. (3) Time needs to be provided to train all personnel involved in compliance management and for briefing the rest of the personnel. (4) The allocation of time and resources needs to be governed by the activities covered by the training organisation.		
AMC2 ATCO.OR.C.001(f) Management system of training organisations Compliance monitoring The person designated for the compliance monitoring function should be responsible for the review and continuous improvement of the established management system's policies, processes and procedures. The following tools are essential to the ongoing continuous improvement process: (a) organisational risk profile; (b) risk management plan; (c) coherence matrix; (d) corrective and preventive action reports; and (e) inspection and audit reports.	3-4	



GM2 ATCO.OR.C.001(f) Management system of training organisations Compliance monitoring (a) These tools and processes related to the compliance monitoring function are interrelated and help define the continuous improvement efforts of the organisation. For example, any corrective or preventive action report could identify a deficiency or an opportunity for improvement. The person responsible for the compliance monitoring function would then be required to ensure the identified issue was addressed and the corrective or preventive action effectively implemented. The same would be true if the discovery of an issue was identified during an inspection or audit. (b) The effective implementation of change and the subsequent validation that the change did result in the desired outcome is critical to the continuous improvement process. Simply introducing a well-meaning suggestion for improvement into the organisation without carefully managing that change could have undesirable consequences. It is, therefore, the responsibility of the person in charge of the compliance monitoring function to introduce, monitor and validate improvement efforts. (c) A simple but effective process to use in managing continuous improvement is known as the plando-check-act, or PDCA, approach: (1) plan — map out the implementation of the recommended change, identifying at least: (i) those people who will be affected by the change; (ii) the required measures necessary to mitigate risk; and (iii) the desired outcome and its intended consequences. (2) do — execute the implementation plan once all affected groups have accepted the proposal and understand their role in ensuring its success;	1	
AMC1 ATCO.OR.C.001(g) Management system of training organisations Size, nature and complexity of the activity (a) A training organisation should be considered as complex when it has a workforce of more than 20 full-time equivalents (FTEs) involved in the activity subject to Regulation (EC) No 216/20084 and its Implementing Rules. (b) A training organisation with up to 20 FTEs involved in the activity subject to Regulation (EC) No 216/2008 and its Implementing Rules may also be considered complex based on an assessment of the following factors: (1) the extent and scope of contracted activities subject to the certificate, in terms of complexity; and (2) the different types of training provided, in terms of risk criteria.	3-4	



ATCO.OR.C.005 Contracted activities (a) Training organisations shall ensure that when contracting or purchasing any parts of their activities, the contracted or purchased activity or part of activity conform to the applicable requirements. (b) When a training organisation contracts any part of its activity to an organisation that is not itself certified in accordance with this Regulation to carry out such activity, the contracted organization shall work under the terms of approval contained in the certificate issued to the contracting training organisation. The contracting training organisation shall ensure that the competent authority is given access to the contracted organisation to determine continued compliance with the applicable requirements.	2-3-4	
AMC1 ATCO.OR.C.005 Contracted activities (a) Training organisations may decide to contract certain parts of their activities to external organisations. (b) A written agreement should exist between the training organisation and the contracted organisation clearly defining the contracted activities and the applicable requirements. (c) The contracted safety-related activities relevant to the agreement should be included in the training organisation's compliance monitoring programme. (d) Training organisations should ensure that the contracted organisation has the necessary authorisation or approval when required, and commands the resources and competence to undertake the task.	2-3-4	
GM1 ATCO.OR.C.005 Contracted activities Responsibility when contracting activities (a) Regardless of the approval status of the contracted organisation, the contracting organisation is responsible to ensure that all contracted activities are subject to hazard identification and risk management as required by ATCO.OR.C.001(c) and to compliance monitoring as required by ATCO.OR.C.001(f). (b) When the contracted organisation is itself certified to carry out the contracted activities, the organisation's compliance monitoring should at least check that the approval effectively covers the contracted activities and that it is still valid.	1	
ATCO.OR.C.010 Personnel requirements (a) Training organisations shall appoint an accountable manager. (b) A person or persons shall be nominated by the training organisation with the responsibility for training. Such person or persons shall be ultimately responsible to the accountable manager. (c) Training organisations shall have sufficient qualified personnel for the planned tasks and activities to be performed in accordance with the applicable requirements. (d) Training organisations shall maintain a record of theoretical instructors with their relevant professional qualifications, adequate knowledge and experience and their demonstration, instructional techniques assessment and subjects they are entitled to teach. (e) Training organisations shall establish a procedure to maintain competence of the theoretical instructors. (f) Training organisations shall ensure that practical instructors and assessors successfully complete refresher training in order to revalidate the respective endorsement. (g) Training organisations shall maintain a record of persons qualified for assessing practical instructors'	3-4	



competence and assessors' competence, in accordance with ATCO.C.045, with their relevant endorsements.		
GM1 ATCO.OR.C.010(b);(c) Personnel requirements (a) Training organisations may nominate the person responsible for training and a person or persons subordinate to him or her as chief training instructor(s)/unit responsible training officer(s). (b) Usually, training organisations nominate only one person responsible for training. (c) Prerequisites, typical function and responsibilities of the person responsible for training may be: (1) to have extensive experience in instructing for all types of ATC training and possess sound managerial capability; (2) to have overall responsibility for ensuring satisfactory integration of all training provided and for supervising the progress of the persons undertaking training; (3) to be responsible for coordinating and delegating the contact to the competent authority in training-related issues; and (4) to be ultimately responsible to the accountable manager. (d) Prerequisites, typical functions and responsibilities of the chief training instructor(s)/unit responsible training officer(s) may be: (1) to have extensive experience in instructing for all types of ATC training and possess sound managerial capability; (2) to have responsibility for ensuring satisfactory training is provided and for supervising the progress of the persons undertaking training in the areas that have been delegated by the person responsible for training; and (3) to report to the person responsible for training.	1	
ATCO.OR.C.015 Facilities and equipment (a) Training organisations shall have facilities allowing the performance and management of all planned tasks and activities in accordance with this Regulation. (b) The training organisation shall ensure that the synthetic training devices comply with the applicable specifications and requirements appropriate to the task. (c) During on-the-job training instruction, the training organisation shall ensure that the instructor has exactly the same information as the person undertaking OJT and the means to intervene immediately.	3-4 Shall be described in the Management system, give ref.	
AMC1 ATCO.OR.C.015(a) Facilities and equipment (a) General areas A training organisation should have access to facilities appropriate to the size and scope of the intended operations provided in an environment conducive to learning. (b) Training areas For training organisations providing theoretical training, the facilities should also include sufficient suitably equipped classroom areas.	See above	



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GM1 ATCO.OR.C.015(a) Facilities and equipment	1	
(a) General areas		
These facilities should include general areas, which consist of sufficient:		
(1) office space for managerial and administrative as well as training staff;		
(2) rooms for study and testing;		
(3) library facilities; and		
(4) storage areas, including secure areas for training and personnel records.		
(b) Training areas		
For training organisations providing practical training, the facilities should also include sufficient:		
(1) rooms for briefing and debriefing; and		
(2) suitably equipped rooms for practical training.		
AMC1 ATCO.OR.C.015(b) Facilities and equipment	See above	
Specifications for synthetic training devices		
(a) Synthetic training devices classifications		
Synthetic training devices used for training should be classified according to one of the following classifications:		
(1) simulator (SIM);		
(2) part-task trainer (PTT).		
(b) Synthetic training device (STD) criteria		
If an STD is used for training, it should be approved by the competent authority as part of the course approval		
process for any training plan. Training organisations should demonstrate how the STD will provide adequate support		
for the intended training, in particular, how the STD will meet the stated objectives of the practical training exercises		
and enable the performance objectives to be assessed to the level determined in the training programme.		
This demonstration and the related documentation should include the following relevant criteria:		
(1) the general environment, which should provide an environment in which STD exercises may be run without		
undue interference from unrelated activities;		
(2) the STD layout;		
(3) the equipment provided;		
(4) the display presentation, functionality, and updating of operational information;		
(5) data displays, including strip displays, where appropriate;		
(6) coordination facilities;		
(7) aircraft performance characteristics, including the availability of manoeuvres, e.g. holding or instrumental landing		
system (ILS) operation, required for a particular simulation;		
(8) the availability of real-time changes during an exercise;		
(9) the processes by which the training organisation can be assured that staff associated with the training conducted		
with the use of an STD are competent;		
(10) the degree of realism of any voice recognition system associated with the STD; and		
(11) where a simulator is an integral part of an operational ATC system, the processes by which the training		
organisation is assured that interference between the simulated and operational environments is prevented.		



The extent to which the STD achieves the above criteria will be used to determine the adequacy of the STD for the proposed use. As a general principle, the greater the degree of replication of the operational position being represented, the greater the use will be possible for any particular training. (c) STD used for pre-on-the-job training When an STD is used for pre-on-the-job training and the training time is counted as operational training, the STD classification should be a full-size replica of a working position, including all equipment, and computer programmes necessary to represent the full tasks associated with that position, including realistic wind at all levels to facilitate SRA. In the case of a working position at a tower unit, it includes an out-of-the-tower view.		
ATCO.OR.C.020 Record keeping (a) Training organisations shall retain detailed records of persons undertaking or having undertaken training to show that all requirements of the training courses have been met. (b) Training organisations shall establish and maintain a system for recording the professional qualifications and instructional techniques assessments of instructors and assessors, as well as the subjects they are entitled to teach, where appropriate. (c) The records required in points (a) and (b) shall be retained for a minimum period of five years subject to the applicable national data protection law: (1) after the person undertaking training has completed the course; and (2) after the instructor or assessor ceases to perform a function for the training organisation, as applicable. (d) The archiving process including the format of the records shall be specified in the training organisation's management system. (e) Records shall be stored in a secure manner.	Shall be described in the management system. Ref. to Management system for TO	
AMC1 ATCO.OR.C.020(a);(b) Record keeping Training organisations should maintain the following records: (a) Records of persons undertaking training: (1) personal information; (2) details of training received including the starting date of the training, as well as the results of the examinations and assessments; (3) detailed and regular progress report forms; (4) certificate of completion of training courses. (b) Records of instructors and assessors: (1) personal information; (2) qualification records; (3) records of refresher training for instructors and assessors; (4) assessment reports; (5) instructional and/or assessment time records. Training organisations should submit training records and reports to the competent authority as required.	See above	



ATCO.OR.C.025 Funding and insurances Training organisations shall demonstrate that sufficient funding is available to conduct the training according to this Regulation and that the activities have sufficient insurance cover in accordance with the nature of the training provided and all activities can be carried out in accordance with this Regulation.	To be described in the application form	
AMC1 ATCO.OR.C.025 Funding and insurances Sufficient funding To demonstrate compliance with the requirement on the availability of sufficient funding, training organisations may be required to present an economic study identifying the minimum amount necessary to ensure that the training is conducted in accordance with the applicable requirements.	3-4	
AMC2 ATCO.OR.C.025 Funding and insurances Sufficient insurance cover To demonstrate compliance with the requirement on sufficient insurance cover, training organisations may be required to provide a deposit of an insurance certificate or other evidence of valid insurance. The insurance cover should be established by taking into account the nature of the training provided, the frequency and the fees applicable to the training courses.	3-4	
SUBPART D – Requirements for training courses and training plans ATCO.OR.D.001 Requirements for training courses and training plans Training organisations shall develop: (a) training plans and training courses associated to the type(s) of training provided in accordance with the requirements set out in Annex I (Part ATCO), Subpart D; (b) subjects, subject objectives, topics and subtopics for rating endorsements in accordance with the requirements laid down in Annex I (Part ATCO); (c) methods of assessments in accordance with ATCO.D.090(a)(3) and ATCO.D.095(a)(3).	3-4 Shall be described in the management system and/or in the training programs	
ATCO.OR.D.005 Examination and assessment results and certificates (a) The training organisation shall make available to the applicant his/her results of examinations and assessments and, upon applicant's request, issue a certificate with his/her result of examinations and assessments. (b) Upon successful completion of initial training, or of rating training for the issue of an additional rating, the training organisation shall issue a certificate. (c) A certificate of completion of the basic training shall only be issued upon request of the applicant if all subjects, topics and subtopics contained in Appendix 2 of Annex I have been completed and the applicant has successfully passed the associated examinations and assessments.	3-4 To be described in the Management system, give reference(s)	