



Civil Aviation Authority of Bangladesh

ANO ATO (PART 3)

Approved Training Organization **(Other than Flight Training and Maintenance Engineering Training)**

Issue 1
March 2024

**CAAB HQ, Kurmitola, Dhaka-1229
Bangladesh**

PREAMBLE

ICAO Annex-1 (Para 1.2.8 and Appendix-2) describes the requirements for approved training and approved training organization (ATO), while Annex 19 includes safety management provisions for an approved training organization that is exposed to safety risks related to aircraft operations during the provision of its services. ICAO Doc 9841 gives the guidance on approval of a training organization. CA Act 2017 Chapter-II, Section-8 authorizes the establishment of approved training organization in Bangladesh. Therefore, this ANO ATO has been prepared as per the SARPS in Annex-1 (Amendments 1 to 178) and Annex-19 (second edition) and following the ICAO Doc 9841 for the approval of Approved Training Organization.

In exercise of the powers conferred by section 14 of Civil Aviation Act 2017, Chairman, Civil Aviation Authority of Bangladesh (CAAB) is pleased to issue this ANO ATO. ANO ATO is divided into 3 parts; ANO ATO Part-1 (Flight Training School), ANO ATO Part-2 (Aircraft Maintenance Engineering Training), and ANO ATO Part-3 (other than Flight Training School and Aircraft Maintenance Engineering Training). ANO ATO Part-3 mainly focuses to the approval of training organization which can provide training services on different fields/ratings/qualifications required for the issue and maintaining of an aviation professional's/personnel license and rating. This ANO also applicable for maintenance of the continued validity of the approval.

Chairman
Civil Aviation Authority of Bangladesh

**APPROVED TRAINING ORGANIZATION
(Other than Flight Training and Maintenance Engineering Training)**

TABLE OF CONTENTS

	Page
Glossary.....	6
List of acronym.....	11
Chapter 1. Process to Approval of The Training Organizations	12
1.1 Issue of approval	12
1.2. The approval document.....	12
1.3. Nature of the approval given to a training organization.....	12
1.4. Approval Process.....	13
1.5. Renewal and continued surveillance.....	13
Chapter 2. Organizational Structure and Qualified Manpower.....	14
2.1. Organizational structure.....	14
2.2. Management and staffing	15
Chapter 3. Training and procedures manual.....	16
3.1. Introduction.....	16
3.2. Content	16
3.3. Amendment.....	16
Chapter 4. Quality assurance (QA)	18
4.1 Objective	18
4.2 Elements	18
Chapter 5. Facilities and equipment	19
5.1 Facilities	19
5.2. Approval of training devices	19
5.3. Third-Party Providers Outsourcing).....	20
Chapter 6. Record Keeping.....	21
6.1 Objective of Record Keeping.....	21
6.2 Record Keeping Characteristics.....	21
6.3 Duration of Record Keeping.....	21
Chapter 7. Oversight exercised by the CAAB.....	22
Chapter 8. Evaluation and Checking	23
Chapter 9. Approval of a foreign ATO.....	24
9.1. Need for approval	24
9.2. Approval process	24

APPENDIX-A: Application for ApprovalA1
APPENDIX-B: ATO Approval & Renewal ChecklistB1
APPENDIX-C: ATO Approval Certificate format (C of A).....C1
APPENDIX-D: Training and Procedure Manual Contents.....D1
APPENDIX-E: Approval of ATO Located Outside Bangladesh.....E1

GLOSSARY

When the following terms are used in this manual, they have the following meanings:

Accountable executive. The individual who has corporate authority for ensuring that all training commitments can be financed and carried out to the standard required by the civil aviation authority, and any additional requirements defined by the approved training organization (ATO).

Note.— The accountable executive is normally the head of training and may delegate to another person within the organization the day-to-day management functions but not the overall approval management responsibility. In complex corporate structures, the accountable executive may be responsible for several different ATOs, each with its own head of training.

Adapted competency model. A group of competencies with their associated description and performance criteria adapted from an ICAO competency framework that an organization uses to develop competency-based training and assessment for a given role.

Alternate means of compliance. A pre-approved manner of achieving regulatory compliance that has been determined to be an acceptable substitute to the regulatory requirements.

Note 1.— An example of alternate means of compliance would be the civil aviation authority's acceptance of reduced training time for personnel undergoing a specific air operator's approved aircraft type-rating training program rather than the training time requirements traditionally prescribed for approved programs of a more generic nature leading to the same aircraft type-rating.

Note 2.— This definition is introduced to ensure that the reader understands the difference between an "alternate means of compliance" (a term used by some States) and an "alternative means of compliance" (a term used by ICAO). The concept of "alternate means of compliance" is not relevant to the guidance provisions of this manual. Alternative means of compliance. An approved alternative to prescribed approaches, which has been demonstrated to consistently achieve or exceed the desired outcomes as intended through regulation.

Approved training. Training conducted under special curricula and supervision approved by a Contracting State.

Approved training organization (ATO). An organization approved by and operating under the supervision of a Contracting State in accordance with the requirements of Annex 1 to perform approved training.

Note.— The Contracting State is required to ensure that the ATO is included in the State's ongoing safety oversight program.

Baseline CAA. The authority whose approval establishes the baseline for the alternative approval process of a foreign ATO.

Checking. See definition of testing.

Competency. A dimension of human performance that is used to reliably predict successful performance on the job. A competency is manifested and observed through behaviors that mobilize the relevant knowledge, skills and attitudes to carry out activities or tasks under specified conditions.

Competency-based training and assessment. Training and assessment that are characterized by a performance orientation, emphasis on standards of performance and their measurement, and the development of training to the specified performance standards.

Note.— This training process is derived from a job and task analysis and is focused on the achievement of well-defined benchmarked standards of performance as opposed to training programs simply focused upon the acquisition of prescribed levels of experience.

Competency standard. A level of performance that is defined as acceptable when assessing whether or not competency has been achieved.

Compliance. The state of meeting those requirements mandated through regulation.

Conditions. Anything that may qualify a specific environment in which performance will be demonstrated.

Conformity. The state of meeting established criteria, standards, specifications and desired outcomes.

Evaluator. A generic term used in the context of an approved training organization (ATO) to describe a person who is qualified, authorized and assigned to carry out specific assessment, checking, testing and/or auditing duties to determine that all required standards of performance have been satisfactorily achieved.

Note 1.— These standards of performance may be obligated as an end-state objective or be required to be met on a continuous basis. In either case, the evaluator is responsible for making a determination of the actual standards attained and any recommendations for immediate remediation.

Note 2.— Evaluator functions may be assigned to suitable ATO instructors for the continuous evaluation of students in a competency-based training program and for progress checks at the end of a phase of training. Evaluator functions, associated with the role of an examiner for the CAAB, may also be assigned to ATO instructors for the final examination at the completion of the training program, either through a civil aviation authority (CAA) designation or under an ATO process approved by the CAA.

Finding. A finding is a conclusion by the operator's or by the civil aviation authority's audit personnel that demonstrates either non-compliance with a regulation or non-conformity with a specific standard.

Foreign ATO. An approved training organization (ATO) located outside of the State or outside of the territory of the States of the regional safety oversight organization.

Hazard. A condition or an object with the potential to cause injuries to personnel, damage to equipment or structures, loss of material, or reduction of ability to perform a prescribed function.

Head of Training. The individual responsible for the organization's activities, policies, practices and procedures while ensuring the continued maintenance of the training organization's approval status.

Note.— The head of training is normally the accountable executive; however, in complex corporate structures it may be possible that the accountable executive is located at company headquarters and oversees the operation of several different ATOs. In this case, the head of training is designated by the accountable executive.

ICAO competency framework. A competency framework, developed by ICAO, with a selected group of competencies for a given aviation discipline. Each competency has an associated description and observable behaviors.

Instructional services manager. The manager responsible for the day-to-day delivery of training services that consistently meet regulatory requirements and organizational objectives.

Note.— The head of training is generally the instructional services manager except when the delivery of training services may spread over several locations or over several specialities, with dedicated instructional services managers.

Instructional systems design (ISD). A formal process for designing training which includes analysis, design and production, and evaluation.

CAAB. CAAB is CAAB in Bangladesh responsible for the licensing of personnel.

Note.— The CAAB shall have the following responsibilities

- a) assessment of an applicant's qualifications to hold a license or rating;
- b) issue and endorsement of licenses and ratings;
- c) designation and authorization of approved persons;
- d) approval of training courses;
- e) approval of the use of flight simulation training devices and authorization for their use in gaining the experience or in demonstrating the skill required for the issue of a license or rating; and
- f) validation of licenses issued by other Contracting States.

Maintenance manager. The manager responsible for the day-to-day provision of aircraft maintenance activities and the continuing airworthiness of all aircraft released for flight operations.

Observable behavior (OB). A single role-related behavior that can be observed and may or may not be measurable.

Performance criteria. Statements used to assess whether the required levels of performance have been achieved for a competency. A performance criterion consists of an observable behavior, condition(s) and a competency standard.

Policy. A document containing the organization's position or stance regarding a specific issue.

Process. A set of interrelated or interactive activities which transform inputs into outputs.

Quality. The totality of features and characteristics of a product or service that bear on its ability to satisfy stated or implied needs.

Quality assurance (QA). All the planned and systematic actions necessary to provide adequate confidence that all training activities satisfy given standards and requirements, including the ones specified by the approved training organization in relevant manuals.

Quality audit. A systematic and independent examination to determine whether quality activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.

Quality inspection. That part of quality management involving quality control. In other words, inspections accomplished to review a document or observe events/actions, etc., in order to verify whether established operational procedures and requirements are being fulfilled during the accomplishment of the event or action, and whether the required standard is being achieved.

Note.— Student stage checks and skill tests are quality inspections, and they are also quality control functions.

Quality management. A management approach focused on the means to achieve product or service quality objectives through the use of its four key components: quality planning; quality control; quality assurance; and quality improvement.

Note.— This definition is specific to this manual.

Quality manager. The manager responsible for the quality monitoring function and for requesting remedial action.

Note.— The quality manager is responsible directly to the head of training. In the event the approved training organization's (ATO's) head of training is not the accountable executive, reporting mechanisms should be instituted to ensure that the accountable executive is aware of all issues impacting the quality of the training services being provided by the affected ATO.

Quality manual. The document containing the relevant information pertaining to the approved training organization's quality system.

Quality of training. The outcome of the training that meets stated or implied needs within the framework of defined standards.

Quality system (QS). The aggregate of all the organization's activities, plans, policies, processes, procedures, resources, incentives and infrastructure working in unison towards a total quality management approach. It requires an organizational construct complete with documented policies, processes, procedures and resources that underpins a commitment by all employees to achieve excellence in product and service delivery through the implementation of best practices in quality management.

Note.— This definition is specific to this manual.

Safety management system (SMS). A systematic approach to managing safety, including the necessary organizational structures, accountabilities, responsibilities, policies and procedures.

Note 1.— A safety management system, consisting of documented policies, processes and procedures designed to manage risks, integrates operations and technical systems with the management of financial and human resources to ensure aviation safety and the safety of the public.

Note 2.— The requirement to adopt SMS practices is restricted to only those entities whose activities directly impact upon the safe operation of aircraft.

Safety manager. The manager responsible for providing guidance and direction for the planning, implementation and operation of the organization's safety management system.

Note.— The safety manager is directly responsible to the head of training. In the event that the approved training organization's (ATO's) head of training is not the accountable executive, reporting mechanisms should be instituted to ensure that the accountable executive is aware of all issues impacting the safety program of the affected ATO.

Testing. The comparison of the knowledge about a task or the skill to perform a task against an established set of criteria to determine that the knowledge or skill observed meets or exceeds, or does not meet, those criteria.

Note.— The use of the words testing or checking depends on the civil aviation authority's preference because they are very similar in meaning, and their use may be dependent on the outcome of the event, e.g. a step towards a license issuance, a recurrent evaluation of competency.

LIST OF ACRONYMS

AAP	Alternative approval process
ADDIE	Analyze, design, develop, implement and evaluate
AMO	Approved maintenance organization
AQP	Advanced qualification program
ATO	Approved training organization
ATQP	Alternative training and qualification program
CAAB	Civil Aviation Authority. Bangladesh
FCLTP	Flight Crew Licensing and Training Panel (ICAO)
FSTD	Flight simulation training device
ISD	Instructional systems design
IWG	International working group
LMS	Learning management system
MPL	Multi-crew pilot license
NOC	No Objection Certificate
PANS-TRG	Procedures for Air Navigation Services — Training
PDCA	Plan–do–check–act
QA	Quality assurance
QS	Quality system
RA	Risk assessment
RSOO	Regional safety oversight organization
SMS	Safety management system

Chapter 1. Process to Approve The Training Organizations

1.1. **Issue of approval:** Approval of ANO ATO Part-3 shall allow the certificate holder to train all the aviation professionals other than pilot and aircraft maintenance engineers for getting their license to work in the aviation fields. The issuance of this approval for a training organization and the continued validity of the approval shall depend upon the training organization being in compliance with the requirements of this ANO and all the training programs of an ATO are acceptable standards to the Chairman, CAAB for the purpose of licensing of aviation personnel.

1.2. **The approval documents:** After satisfactory certification of ATO, the certificate of Approval (COA) shall be issued to an applicant. The Certificate of Approval shall contain at least the following:

- 1.2.1. organization's name and location;
- 1.2.2. date of issue and period of validity (where appropriate);
- 1.2.3. terms of approval.
 - a) Satisfactory safety oversight/audit report by CAAB as per the checklist given at APPENDIX: B;
 - b) All manuals;
 - c) Corrective action plan (if any).

1.3. **Nature of the approval given to a training organization:** The flight training organizations shall be approved as per ANO ATO (Part-1) and the maintenance engineering training organizations will be approved as per ANO ATO (Part-2) which exists as ANO (AW) Part-145. ATOs under ANO ATO (Part-3) shall be approved to conduct any aviation related professional training (other than flight and maintenance training) as below:

- 1.3.1. Dangerous Goods Regulations (DGR);
- 1.3.2. Safety Equipment and Emergency Procedures (SEEP);
- 1.3.3. Reduced Vertical Separation Minimums (RVSM);
- 1.3.4. Performance Based Navigation (PBN);
- 1.3.5. Crew Resources Management (CRM);
- 1.3.6. Safety Management System (SMS) / Flight Safety Officers Course; for
 - 1) Flight Crew / Head of SMS / Head of Safety;
 - 2) Maintenance Crew;
 - 3) ATCO/ATS;
 - 4) Aerodrome/Airport Personnel;
- 1.3.7. Aircraft Accident Investigation;
- 1.3.8. Quality Assurance System/Management (QAS/QAM);
- 1.3.9. Cabin Crew;
- 1.3.10. Cabin Safety;
- 1.3.11. Instructional Technique (IT);
- 1.3.12. Air Traffic Controller License/Officer (ATCL/ATCO);
- 1.3.13. Aviation Physiologist/Medical Assessor;
- 1.3.14. Human Performance and Limitations (HPL);
- 1.3.15. Aviation Security (AVSEC)
- 1.3.16. Aviation Meteorologist;

- 1.3.17. Aerodrome Fire Fighter;
- 1.3.18. Aviation Security and Intelligence;
- 1.3.19. Bomb Threat and Counter-Terrorism in Aviation;

Chairman, CAAB may approve any other training course inclusion as the changes at scope of an ATO through special audit which may be required for aviation personnel and licensing other than above mentioned training. All training shall be carried out as initial and refresher as per the policy of CAAB, service providers and operators.

1.4 **Approval Process:** The approval process of an ATO shall follow five phases as described below:

1.4.1. PHASE 1: PRE-APPLICATION PHASE

- 1) First letter informing the intention and requesting a meeting with CAAB.
- 2) First meeting and requesting the minutes of the meeting for communication with concerned/detailed CAAB personnel.
- 3) NOC from CAAB.

1.4.2. PHASE 2: APPLICATION PHASE

- 1) Arranging manpower and setting up the organogram.
- 2) Purchase/Lease process of training facilities/aides.
- 3) Infrastructure development.
- 4) Application with CAAB's format. (Appendix: A)

1.4.3. PHASE 3: DOCUMENT EVALUATION PHASE

- 1) Composition and submission of all manuals.
- 2) Policy formulation as per working handbook.
- 3) Corrective action plan.

1.4.4. PHASE 4: DEMONSTRATION AND INSPECTION PHASE

- 1) ATO approval/certification audit by CAAB authority as per audit checklist. (Appendix: B)
- 2) Training demo.

1.4.5. PHASE 5: CERTIFICATE ISSUING PHASE

- 1) Final audit and certificate issuance. (Certificate of Approval; Appendix: C)

1.5. **Renewal and continued surveillance:** The certificate of approval shall be subject to yearly renewal on satisfactory renewal audit by CAAB authority. The renewal audit will be carried out as per the checklist given at Appendix: B. The ATO will also be subjected to continued surveillance by the CAAB Authority to ensure that the ATO is operating within the terms of its approval and as described in its training and procedures manual.

Chapter 2. Organizational Structure and Qualified Manpower

2.1. **Organizational structure:** The organizational structure of an ATO will vary depending upon the scope and complexity of its training model. The design and make-up of its structure should ensure that the delivery of training meets the client's needs and expectations, while maintaining compliance with the applicable CAAB requirements.

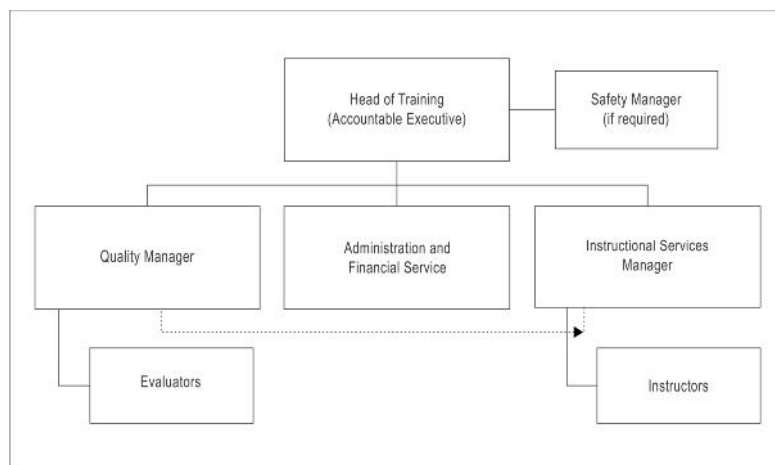


Figure-1 : Example of a small training organization

There may be small, medium or large organizational structure depending upon the scope and functions of the training organizations:

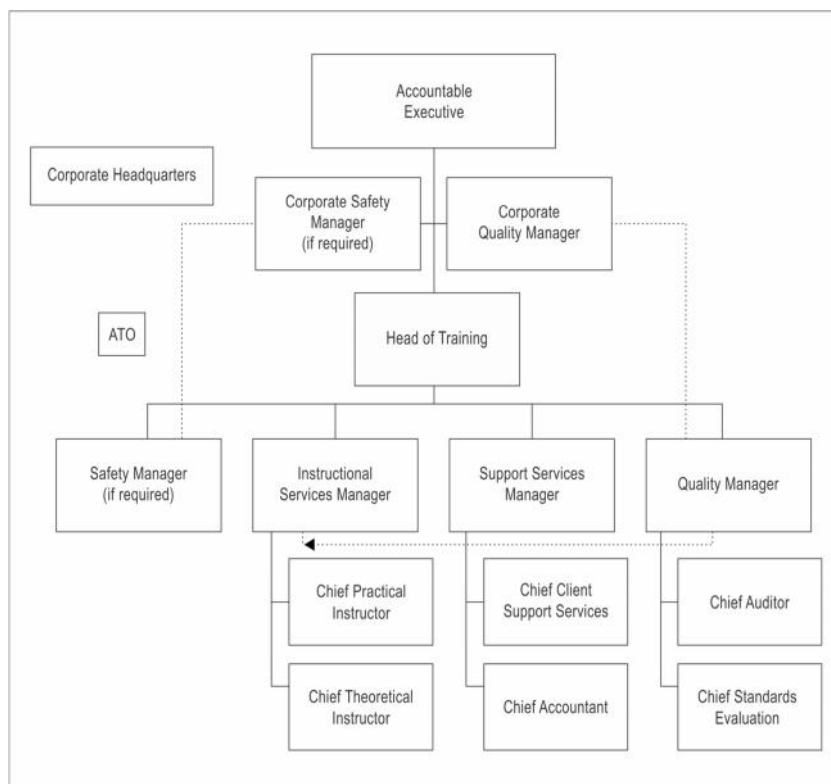


Figure-2 : Example of medium training organization

2.2. **Management and staffing:** ATOs need to have a management structure that is designed around best quality management practices. A training organization must have the basic structure to meet the acceptable compliance as below;

2.1.1. **Accountable manager:** Accountable Manager is the final authority on decisions that may impact upon the continued suitability of the organization to deliver training to aviation personnel for licensing purposes.

2.1.2. **Head of training:** Responsible for overall planning and execution for all types of training.

2.1.3. **Training coordinator:** Day to day training program and ensuring coordination between instructors and trainees.

2.1.4. **Qualified instructors:** Trained and certified instructors as per CAAB regulations (Annexure-12 to ANO-1).

2.1.5. **Quality assurance manager/officer:** Ensure the acceptable quality of training and procedures.

2.1.6. **Maintenance manager;** A maintenance manager is required if the ATO operates devices for which the civil aviation authority (CAA) regulations mandate a maintenance program (e.g. qualified simulation training devices or air traffic control equipment).

2.1.7. **Administration and finance officials;** Administrative staffs for supporting the administration and financial aspects of the ATO.

Chapter 3. Training and Procedures Manual

3.1. Introduction: The Training and procedure manual (TPM) shall required to be approved by CAAB. It describes the training programs being offered and the way in which the training organization conducts its activities. It is an essential document for the training organization because it provides the management and line personnel with clear guidance on the policy of the training organization as well as the procedures and processes which are used to provide training. It is also an essential document for the CAAB. During the approval process, it allows the Authority to assess whether the way in which a training organization is planning to operate is in line with existing requirements and accepted practices. Once the training organization is approved, a large part of the surveillance activities of CAAB shall be to ensure that the ATO is following the training and procedures manual.

3.2. Content: It is important that the contents of the training and procedures manual be consistent with other operational documents, regulations and manufacturer's requirements. The manual should also be user-friendly. It is also necessary to ensure that the manual is used consistently across all departments within the ATO. This can be achieved through an integrated approach that recognizes operational documents as a complete system. The TPM shall be issued in separate parts and shall contain at least the following information:

3.2.1. A general description of the scope of training authorized under the organization's terms of approval;

3.2.2. The content of the training programs offered including the courseware and equipment to be used;

3.2.3. A description of the organization's quality assurance system;

3.2.4. A description of the organization's facilities;

3.2.5. The name, duties and qualification of the person designated as responsible for compliance with the requirements of the approval;

3.2.6. A description of the duties and qualification of the personnel designated as responsible for planning, performing and supervising the training;

3.2.7. A description of the procedures used to establish and maintain the competence of instructional personnel as required;

3.2.8. A description of the method used for the completion and retention of the training records required by CAAB;

3.2.9. A description, when applicable, of additional training needed to comply with an operator's procedures and requirements; and

3.2.10. When CAAB has authorized an approved training organization to conduct the testing required for the issuance of a license or rating, a description of the selection, role and duties of the authorized personnel, as well as the applicable requirements established by CAAB.

A content of Training and Procedure Manual is given as a guideline at Appendix: D.

3.3. **Amendments:** The training organization shall ensure that the training and procedures manual is amended as necessary to keep the information contained therein up to date. The ATO should also develop an information review, distribution and revision control system to process information resulting from changes that originate within the ATO. This includes changes to:

- 3.3.1. The ATO's policies, processes, procedures and practices;
- 3.3.2. Respond to operating experience;
- 3.3.3. The scope of training provided;
- 3.3.4. The content of training programs;
- 3.3.5. Results stemming from the installation of new equipment;
- 3.3.6. An approval document or certificate requested by the ATO and issued by CAAB;
and
- 3.3.7. Maintain standardization of training delivery and performance criteria.

Copies of all amendments to the training and procedures manual shall be approved by CAAB and furnished promptly to all organizations or persons to whom the manual has been issued.

Chapter 4. Quality Assurance (QA) System

4.1. **Objective:** The objective of QA is to ensure the achievement of results that conform to the standards set out in the ATO's manuals and in requirements and documents issued by CAAB. The effective application of QA principles will aid the ATO in meeting all regulatory requirements. Quality is an outcome of a number of processes: establishing standards; planning activities and documenting procedures to support such activities and standards; training the personnel involved before implementing the documented procedures; and measuring the outcomes of the activities to ensure that they meet the standards and expected results. If any non-conformities are found, corrective actions are taken to improve processes and procedures. It is to be emphasized that, to be truly effective in delivering the very best possible products and services, ATOs need to implement proactive as well as reactive processes.

4.2. **Elements:** The following QA elements is be defined and identified in the training and procedures manual:

- 4.2.1. The ATO's training policy (for clients as well as for its own personnel);
- 4.2.2. Training standards;
- 4.2.3. Allocation of responsibility;
- 4.2.4. Resources, organization and operational processes;
- 4.2.5. Procedures to ensure conformity of training with the training policy;
- 4.2.6. Procedures for identifying deviations from training policy and standards, and for taking corrective action, as necessary; and
- 4.2.7. The evaluation and analysis of experiences and trends concerning policy and training standards, in order to provide feedback into the system for the continual improvement of the quality of training.

Note: Details on the requirements for QA and the quality system for an ATO can be found in ANO ATO (Part-1) where the flight training part can be skipped for the better understanding for the Part 3.

Chapter 5. Facilities and Equipment

5.1. **Facilities:** An ATO should have access to facilities appropriate to the size and scope of the intended operations provided in an environment conducive to learning. These facilities should include:

5.1.1. General areas which consist of sufficient:

- 1) Office space for ATO managerial, administrative and training staff;
- 2) Study and examination rooms and reference/library facilities; and
- 3) Storage areas, including secure areas for training and personnel records;

5.1.2. Classroom areas which are suitably equipped to effectively deliver the theoretical elements of the training program in accordance with the training and procedures manual; and

5.1.3. Practical training areas which are designed and equipped to ensure the attainment of end-state competencies. These facilities should include, whenever applicable:

- 1) Operations, planning and briefing rooms;
- 2) Simulation and procedure trainer areas; and
- 4) Parts, tools and material storage areas.

5.2. Approval of Training Devices

5.2.1. With the rapid improvements in technology, an increasing number of simulation training devices for training licensed personnel within the aviation industry are entering the marketplace. Some training programs even use web based simulation to such an extent that full accreditation for successful program completion is achieved without the trainees ever having to leave their normal place of work or, in some cases, their residence.

5.2.2. Each training device that is intended for training, testing or checking in an approved training program and for which credit is being sought shall be assessed/evaluated and approved by CAAB, prior to initial use, as per manufacturer testing standard and for determination of its suitability.

5.2.3. In addition to meeting the obligations of CAAB regulations, the ATO should implement at least the following for all training devices:

- 1) A routine maintenance program to ensure that the training devices continue to function properly and, when applicable, continue to accurately replicate any component, system or equipment for which training, checking or testing credits are being sought; and
- 2) A record-keeping process for each training device to be established and maintained, which accurately records the device's use and lists any discrepancies with respect to its functionality or intended performance characteristics that may impact training.

5.2.4. For an ATO, the suitability of a simulation training device shall be determined considering the training tasks proposed, and the capability of the device to achieve the desired training outcome. In doing so, manufacturer testing standard for determination of its suitability may be taken as reference.

5.3. Third-Party Providers (Outsourcing)

5.3.1. **Courseware:** As training program design becomes more sophisticated, an ATO may be allowed to outsource for the development of courseware. This is particularly true with competency-based programs that require a relatively short-term increase in manpower during the development phase. Whether or not an ATO engages outside assistance in designing and providing courseware, CAAB needs to evaluate the quality and suitability of its courseware. The work being performed by the third-party provider should therefore be subjected to the same quality assurance (QA) practices that the ATO is expected to apply to its own work.

5.3.2. **Facilities and Equipment:** Frequently the aviation training industry runs in cycles, during which ATOs may be operating below capacity for long periods of time only to suddenly find themselves inundated by demands that exceed their ability to deliver. An ATO may also need equipment for some parts of the training which may not be economically viable to own. To mitigate the impact of not being able to effectively respond and thus potentially lose valued clients, ATOs frequently may have standing agreements with other institutions to lease facilities and equipment. The temporary use of another organization's facilities and equipment can present challenges in terms of the QA processes of the ATOs. Under these circumstances, a breakdown in vigilance can cause serious damage to the integrity and quality of the training. To mitigate this, ATOs should develop contingency plans in their quality manual for instances when training levels are such that the use of another institution's facilities and equipment is required.

5.3.3. **Personnel:** The most frequent outsourcing practice of ATOs is the hiring of temporary instructional personnel. It is during these times in particular that a robust quality system will protect the integrity and quality of an ATO's training programs and the ATO's reputation for delivering quality products and services. Despite their best intentions and qualifications, temporary employees elevate the risk of non-standardized delivery of training and of a decrease in the level of service provided to the ATO's clients. Detailed, documented policies, processes and procedures that are easy to understand and uniformly applied, combined with initial indoctrination training, will go a long way to mitigating this risk. Besides training its regular staff, ATOs should ensure that refresher training is implemented on a scheduled basis for part-time or temporary instructional personnel prior to commencing their duties after a specified period of inactivity. Re-familiarization with the ATO's quality system and expected levels of service should be included in this training scheme. Besides the contingency plan, the ATO's quality manual should include policies, processes and procedures for the employment of temporary instructional staff.

Chapter 6. RECORD KEEPING

6.1. **Objective of Record Keeping.** Keeping accurate and complete training records is an important aspect of complying with the approval requirements. It is also an essential tool for the ATO to ensure the continuity and consistency of its training. The qualifications required for training personnel and trainees should be recorded in the record-keeping system to ensure that those qualifications are monitored and current.

6.2. **Record Keeping Characteristics:** The record-keeping system of an ATO have the following characteristics:

6.2.1. **Completeness.** The records kept by the ATO should be sufficient to provide documentary evidence of each training action and allow the reconstruction of the training history of each student or instructor in the ATO.

6.2.2. **Integrity.** It is important to maintain the integrity of records, ensuring that they are not removed or altered. A backup of the records is also necessary to ensure continuity in case of a major disaster.

6.2.3. **Accessibility.** Records of both instructional personnel and trainees should be readily accessible.

6.3. **Duration of Record Keeping:** Each ATO should also establish rules for archiving personal employment and training records that are non-active. All training related record is to be preserved for 05 (five) years.

Chapter 7. Oversight

7.1. Oversight shall be carried out by CAAB as per the checklist given at APPENDIX-B. It consists of the approval process of an ATO and the continued surveillance of the ATO's training delivery after approval. The purpose of the surveillance activities is to ensure that the ATO is operating within the terms of its approval and as described in the training and procedures manual. It includes a review of the ATO's quality assurance (QA) system, its administrative, technical and training records and its operational activities. Surveillance is an ongoing function that may also include consideration of records held by the CAAB, for example, flight test and examination results, in addition to on-site inspections, audits and other surveillance activities.

7.2. The main elements of the ATO activities that are subject to the CAAB's oversight include, as applicable, the following:

- 7.2.1. Staff adequacy in terms of number and qualifications;
- 7.2.2. Validity of instructors' licenses, certificates, ratings and authorizations;
- 7.2.3. Personal record folders;
- 7.2.4. Appropriate and adequate facilities for the training and for the number of students;
- 7.2.5. Documentation process (e.g. the review and update of the training and procedures manual), with particular emphasis on course documentation, including records of updates, training/operations manuals, etc.;
- 7.2.6. Training delivery in the classroom and in simulation devices and, if applicable, on the-job training, including briefing and de-briefing;
- 7.2.7. Instructor training (initial and refresher);
- 7.2.8. QA practices;
- 7.2.9. Training, examination and assessment records;
- 7.2.10. Evaluation and checking;
- 7.2.11. Equipment serviceability; and
- 7.2.12. Training device qualification and approval.

7.3. In case where CAAB has approved a foreign ATO using the alternative approval process described in Chapter 9, CAAB may find it desirable to rely, to a certain extent, on the surveillance system of the baseline CAAB to supplement their efforts.

Chapter 8. Evaluation and checking

8.1 Evaluation and Checking of trainees is an importance element of an ATO. In this case, CAAB will give necessary directive or approval of evaluation procedure in ATO TPM. A general guideline for the ATO for evaluation is avoiding conflict of interest in evaluation process, i.e. the instructional personnel with the evaluating personnel. The evaluating personnel are normally CAAB personnel. As per Annexure-12 of ANO-1, all instructors are to be approved by CAAB, and CAAB will have its own designated personnel as evaluator to conduct evaluation of the trainees. However, the total procedure of evaluation and checking is to be described in ATO TPM (Chapter 3 of Appendix D to ANO ATO (Part-3)).

Chapter 9. APPROVAL OF A FOREIGN ATO

9.1. **Need for Approval:** CAAB shall also approve an ATO which is located outside Bangladesh and whenever any applicant wishes to get an approved training in any other state.

9.2. **Approval Process:**

9.2.1 Any applicant who wishes to conduct aviation related training (other than flight training and aircraft maintenance licensing training), is required to fulfill an approval process of the ATO located outside Bangladesh as per the laid down requirements and procedure in Appendix E of ANO ATO (Part-3).