

IOSA Guidance for Safety Monitoring under COVID-19

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2. Introduction

During this unprecedented COVID-19 crisis, airlines around the world are cancelling flights, temporarily suspending operations and continuing with limited resources. Considering the abnormal conditions under which operations take place, the effective and flexible monitoring of quality, compliance and safety management systems carry special importance.

This document provides guidance to airlines on how to effectively manage quality, compliance and safety monitoring during the COVID-19 crisis.

The recommendations provided herein are to be considered as a baseline for best practices. All airlines should also follow regulations and guidance issued by applicable authorities.

IATA will continuously improve and update this guidance in alignment with IOSA program policies.

3. Monitoring of Internal Operations and Maintenance Functions

3.1 General

Airlines are likely to face challenges in monitoring their operations. The following procedures are applicable to the monitoring of internal operations and maintenance functions addressing risk assessment, evaluation, auditing, and other acceptable methods to ensure compliance with all applicable regulatory requirements and IOSA Standards and Recommended Practices.

The following summarizes the recommendations for the monitoring of the operations conducted under COVID-19 measures, if the operations become limited or inactive or if the operations are suspended.



* This figure has been designed using resources from Freepik.com, designed by macrovector.



3.2 Operations under COVID-19

3.2.1. Monitoring Compliance with COVID-19 Relevant Requirements

Aviation authorities as well as industry organizations such as IATA are issuing new regulations and/or guidance concerning the management of the COVID-19 crisis. Airlines should review the issued health and operational safety requirements and adjust their procedures accordingly.

In this context, ISM Edition 13 ORG 3.2.2 states: "The Operator shall have a process to identify changes within or external to the organization that have the potential to affect the level of safety risks associated with aircraft operations, and to manage risks that may arise from or are affected by such changes in accordance with ORG 3.1.1 and ORG 3.1.2."

In light of the above provision, airlines should ensure risk management is applied to changes introduced through new health and occupational safety requirements that have the potential to affect the established operational processes, procedures, products, equipment and services. Also, risk management should be applied to any organizational and operational changes imposed due to COVID-19 crisis.

IATA is closely monitoring developments related to the COVID-19 crisis in coordination with the World Health Organization (WHO) Secretariat, ICAO and the US Centers for Disease Control. Resources and guidance for the airlines and the other travel professionals can be found at https://www.iata.org/en/programs/safety/health/diseases/.

3.2.2 Conventional Onsite Audits

If the current conditions allow to perform onsite audits for the assessment of internal operations and maintenance functions, airlines should perform the audit in accordance with processes and procedures defined in its applicable manuals.

Airlines should ensure relevant requirements and guidance related with COVID-19 such as social distancing rules, use of protective equipment etc. are followed by the auditors and auditee whilst the audit is being performed. Refer to the <u>WHO</u> site for relevant information.

3.2.3 Remote Audit

If the current condition does not allow to perform internal onsite audits, the Operator may decide to perform remote audits as an alternative method. Main processes and procedures relevant to such method should be documented.

The following should be considered for the different phases of the audit process:

Audit Planning

- Detailed audit plan that includes scheduled calls, persons to be interviewed
- Internet connection and reliable communication equipment availability
- Documentation access (cloud server, file sharing platform, documentation software etc.)
- IT solutions for video conferencing and document sharing etc.
- Requesting a cross-reference list to enable an efficient remote assessment
- Determining the methodology and techniques to be used for assessing the records remotely
- Identifying the personnel to be interviewed



Documentation Audit

- Reviewing the cross-reference list
- Assessing the documentation prior to the start of the remote audit
- Analyzing the previous audit results and other information as applicable

Implementation Audit

- Assessing records and evidences provided through cloud storage or shared server, live sharing of screens or any other acceptable methods
- Observing records and evidences through shared pictures
- Uploading records and evidences into an auditing software
- Interviewing management and operational personnel through video conference tools
- Observing the operation through live video broadcasting
- Increasing sampling size whenever possible, to compensate for the lack of direct observation of operations

3.2.4 Risk Assessment of Active Operations' Conformity with the IOSA Requirements

If the airline is unable to perform onsite or remote audits due to lack of auditors or unavailability of operational and management personnel, an assessment should identify the risk levels regarding the compliance with IOSA requirements.

As the operations are performed under abnormal COVID-19 conditions, the risk of not complying with each ISARP may be determined. In accordance with identified risk levels, monitoring methods should be established. In other words, with this approach immediate concerns requiring mitigation, area of concerns requiring monitoring and areas without concerns could be determined.

Monitoring methods may include the following but are not limited to:

- Self-assessment by operational departments;
- Assessment of the reports and feedback from the station manager/personnel, flight crew and any other operational personnel; and
- Any other acceptable methods.

3.3 Limited Operations

If any part of the operations became inactive due to the crisis, for example if the operator suspended its passenger transport operations, airlines should review their quality assurance program and the audit plan and postpone relevant audits.

Before inactive operations restart, airlines should consider one or a combination of the following monitoring methods:

- Conducting risk assessment of inactive operations' compliance with requirements as defined in **3.2.4**
- Conducting remote assessment(s) before the inactive operation restarts as defined in **3.2.3** and/or
- Collecting and analyzing the self-assessments performed by the relevant operational departments before the inactive operation restarts and/or



• Any other acceptable method

3.4 No Operations

If the airline's entire operation is temporarily inactive due to the crisis or governmental measures, monitoring is important to anticipate and prepare the operation restart.

Before the operations restart, airlines should ensure necessary measures are in place and consider one or more of the following monitoring methods:

- Conducting risk assessment of active operations' compliance with the requirements as defined in **3.2.4**
- Conducting remote assessment(s) before the inactive operation restarts as defined in **3.2.3** and/or
- Collecting and analyzing the self-assessment performed by the relevant operational departments before the inactive operation restarts and/or
- Any other acceptable method

4. Monitoring External Service Providers & Other Airlines

4.1 Monitoring Service Providers

4.1.1 General

Similar to internal monitoring activities, Operators are likely to face difficulties and challenges in the monitoring of their service providers during COVID-19 crisis. Thus, the following recommendations provide assistance in the monitoring of external service providers.

The following illustration summarizes the recommendations for the monitoring of the external service providers under COVID-19 crisis.





IATA's Safety Audit for Ground Operations (ISAGO) program offers airlines several benefits when used as part of the monitoring of ground operations safety. The program is recognized as an acceptable means of conformance for the IOSA requirements related to risk management and oversight of such outsourced arrangements.

ISAGO is particularly beneficial for an airline that as a result of the COVID-19 crisis found itself with depleted auditing resources, requiring new ground service providers or seeking a ground service provider at a new destination. ISAGO also promotes the use of the IATA Ground Operations Manual (IGOM) and other IATA reference documentation in the development of operational procedures by ground service providers to achieve conformity with the ISAGO standards. ISAGO is the only program that requires a ground service provider to have a safety management system equal to that required of an airline, and demonstrably assists the development of a better safety culture.

Airlines that enter into an ISAGO Airline Membership Agreement receive unlimited access to the ISAGO Registry that hosts over 500 ISAGO Audit Reports and other valuable information on ground service providers at over 250 airports worldwide. ISAGO Audit Reports cover corporate safety audits of all ISAGO Registered ground service providers and the audit of at least one of their station operations. During the COVID-19 crisis, ground service providers that are not able to conduct ISAGO Registration renewal audits or unable to close an audit are required to submit to IATA an extenuating circumstances questionnaire that provides information on maintaining safety. The submitted questionnaires are also only available from the ISAGO Registry.

Here is the link to the <u>ISAGO website</u> for more details. If you are interested in gaining access to the ISAGO Registry, ISAGO Audit Reports and questionnaires please contact the ISAGO team at <u>isago@iata.org</u>.

4.1.3 IATA Audit Pools

De-Icing/Anti-Icing Quality Control Pool

Operators may continue to use the De-Icing/Anti-Icing Quality Control Pool known as DAQCP. It currently consists of about 100 member airlines and through its active members, performs inspections on approximately 600 companies that provide de-icing/anti-icing services and post de-icing/anti-icing checks at more than 300 airports worldwide. The DAQCP also offers a passive membership to operators that do not have an audit organization or the experience in winter operations.

The 2019-2020 Winter season was finalized before the COVID-19 crisis, except for a few stations. Reports are available and valid for one year.

Here is the link to the **DAQCP** website for more details.

IATA Fuel Quality Pool

The IATA Fuel Quality Pool (IFQP) is a group of almost 200 airlines that share fuel inspection reports and workload at more than 1400 airports worldwide. The IFQP offers the opportunity to join as active or passive members should an airline require to simply buy station reports.

The pool counts with hundreds of full inspection reports for at least 1000 airports. Due to the COVID-19 many airports are now being monitored via Desktop Audit until a full inspection is possible again. Information is available for IFQP airline members as to the latest status at each airport. Here is the link to the <u>IFQP website</u> for more details.



IATA Drinking-Water Quality Pool

The IATA Drinking-Water Quality Pool (IDQP) was created by airlines to share audits on drinking-water quality around the world. IDQP also developed its own procedures for conducting airfield inspections, using the highest quality standards. Many airports still count with valid full inspection reports, others are only covered via desktop audits. If required, airlines may consider to be part of the pools to reduce the workload and costs. Here is the link to the IDQP website for more details.

4.1.4 Other Methods for Monitoring External Service Providers

Among others, the airline may use following methods for the monitoring of external service providers:

- Use of self-assessment checklists, questionnaires, and postal audits
- Systematic review & risk assessment of reported hazards and/or occurrences
- Assessment of performance reports
- Ongoing assessment of the reporting and feedback from the station manager/personnel, flight crew and any other operational personnel
- If conditions allow, perform onsite or remote audits and inspections, and
- Any other acceptable monitoring method

4.2 Monitoring Other Airlines

The IATA Operational Safety Audit (IOSA) Program is an internationally recognized and accepted evaluation system designed to assess the operational management and control systems of an airline. Airlines should use the IOSA Program for the monitoring of other airlines such as codeshare and wet lease partners.

If an airline is unable to undergo or complete a registration renewal audit prior to the current expiration date, the airline can currently submit a claim of Extenuating Circumstances for Audit Conduct and provide an up-to-date status report. Such status report is called SAR.F23 - Extenuating Circumstances - Operator Questionnaire. This questionnaire should be used for the monitoring partner airlines as an acceptable method to the IOSA Audit Reports during the COVID-19 crisis.

IOSA Audit Reports and Operator Questionnaires can be requested by accessing the online <u>IOSA</u> <u>Repository</u> system. Please use this link to <u>Register as a user</u>.

For any questions, please refer to the IOSA Repository User Guide (pdf) or contact iosa@iata.org.

Non-IOSA registered entities should also complete this <u>request form</u> (doc) and return it to the IOSA team.



5. Identifying Hazards to Operations

All the key elements and resources of the airlines' safety management system (SMS) should be in place and functional to the extent possible. The airline's SMS should be focused on:

- Management of the required changes as a result of the COVID-19 crisis and relevant operational restrictions;
- Hazard identification and risk analysis of the new operational environment should be thoroughly performed;
- In a new and/or reduced operational environment, the hazard identification methods as well as the acquisition of information and data should be considered key factors. It is recommended to:
 - Encourage the voluntary reporting or create a new report form to be filled for each flight, especially if the number of operations has been drastically reduced;
 - Create new reporting forms to complement the internal monitoring;
 - Ensure the analysis of flight data of the complete flight operations.
- Encourage personnel for additional safety reporting in regard to the effect of COVID-19 crisis on the safety.

For questions and suggestions, contact iosa@iata.org.