

IS-BAH Policy 2020-01 - Revision 3

Subject: International Standard for Business Aircraft Handling (IS-BAH) Covid-19 Remote Audit Option

Effective Date: 31 March 2021 through 31 December 2021

1 Purpose

In response to the demanding times currently being faced by aviation professionals and organizations, as communicated in the IBAC INFO – COVID-19 IBAC Programme Auditing Mitigation Option, since March 18, 2020, IBAC has permitted remote auditing registration audits to support operators whose registration is about to expire as the world faces the restrictions imposed by several governments to fight the COVID-19 pandemic. This document details the conditions, limitations, procedures and guidelines that apply to remote audits conducted for the IS-BAH programme under this temporary mitigation option for discretionary use where socially responsible.

Taking into account the further continued impacts of COVID-19 and the information and feedback gathered in the remote audits conducted between the months of March 2020 and March 2021, Revision 3 to this document expands the applicability now through to December 31, 2021 (unless modified by IBAC), and updates the limitations and guidelines applicable to remote audits conducted under this Policy to further support the operators registered in the IS-BAH programme.

Note 1: Operators located in countries or regions where restrictions are less limiting might choose to undergo a traditional onsite audit with a local auditor. The limitations and conditions described herein do not apply to traditional onsite audits.

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Stage 1 – Organizations seeking initial Stage 1 registration are eligible for a full remote documentation review assessment against the Stage 1 protocols under this process. Successful audits will initially be issued a Stage 1 (Provisional) registration until such time the onsite portion can be completed at a later date (initially within 12 months), where no implementation issues are noted during the onsite review the registration will revert to a full Stage 1 for two years.

Stage 2 – Organizations seeking initial Stage 2 registration (Stage 1 to Stage 2) and those seeking renewal of Stage 2 registration are also eligible for a full remote documentation review assessment against the Stage 2 protocols under this process. Successful audits will initially be issued a Stage 2 (Provisional) until the on-site portion can be completed at a later date (Initially within 12 months),

where no implementation issues are noted during the onsite review the registration will revert to a full Stage 2 for two years.

For the above, where the use of video technology allows for a full “virtual” onsite audit to be conducted (including on request video interviews, airside/facility tours, etc.) the IS-BAH Audit Manager will have the authority to award full registrations on successful completion of the audit where appropriate.

Stage 3 – Positive feedback from audits so far conducted have given us the confidence to now extend the Policy to permit the remote auditing option to those seeking initial Stage 3.

3 Procedures

The Planned Audit Notification must be submitted by the auditor via the PAN form as usual. In the “other information” box at the foot of the form, please indicate if a remote audit or full virtual audit is planned. The Audit Manager will review the PAN and respond with any acceptance limitations in case a virtual audit is planned.

Remote auditing provides flexible conditions for the conduct of an audit. Systems and records related to the audit (e.g. training records, GSE maintenance tracking system, maintenance controls and records, compliance monitoring, SMS records including hazard reports, Internal Evaluation/Audit and Management of Change records, SPI monitoring records, etc.) must be accessible and available for demonstration to the auditor either via electronic sharing, or via video conferencing (sharing screen or showing hard copy records).

The policies and procedures contained within the APM 8th Edition remain valid for all remote documentation audits, except where any imposed social distancing restrictions make compliance with the APM policies impossible or impractical. These exceptions, as well as a description of how the audit was conducted, must be detailed in the Audit Summary of the Audit Report. The Audit Manager may, during the review process, request additional actions to be taken by the auditor before acceptance of the audit.

Terry Yeomans
Programme Director, IS-BAH

Guidance for the Conduct of Remote Audits

Preparation for any audit is crucial, and even more so when the audit is to be conducted remotely. Auditors should begin the audit documentation process a week or two in advance so that time spent in virtual discussions can be used more efficiently. Experience shows that long remote audit days can be tiring and ineffective; auditors and operators are therefore encouraged to plan for the audit in a way to allow for a maximum of 4 to 5 hours per day in front of the computer screen where possible. Although this results in an audit spanning a higher number of days, it provides for a more efficient and positive overall experience.

Auditors may also consider asking the operator to prepare videos on the ramp operations and facility before the audit, providing the operator with a detailed list of those items to be highlighted in the video tours of the ramp operations and facilities. Although this does not replace the live inspections of the facilities and ramp operations, it allows for a more efficient use of the time on those live inspections by focusing on specific areas of interest or concern. Auditors should also coordinate with the operator on a detailed agenda for the audit.

When conducting an audit remotely, it is essential that the auditor maintain control of the audit at all times. Provide direction to the operator as to what you would like to see, what records you would like to sample and who you would like to interview. Be sure to keep the random element in your sampling. Request read-only access to relevant software systems used for things such as SMS management, equipment maintenance tracking, training matrix, etc. Even if the operator cannot grant you access to the programs, you can have them demonstrate the use in front of the video camera that you are using for the audit, or by sharing their screen depending on the remote connection tools being used for the audit. The same is true for paper copy documents which you should request the operator to hold up in front of the camera or send you a picture so that you can see them. Again, be sure that you are telling the operator what documents it is that you would like to see, rather than letting them pick the documents for you.

Appropriate technology is essential for a successful remote audit. Be sure to inform the operator of the platform you wish to use to conduct the audit. If you don't have access to an online video conference calling program, consider using programs like FaceTime, WebEx, Zoom, GoToMeeting, Tango, Kix, WhatsApp, Skype, Google Meet, Microsoft Teams, etc. The choice of the program needs to be discussed beforehand to ensure that the operator and auditor both have personal electronic devices that are capable of using the selected platform as some of these apps are exclusive to certain device brands. For example, FaceTime works only on Apple products. Also, make sure that all participants in the audit process are familiar with the devices and technology that you intend to use

so that they can be comfortable facilitating the remote audit. Note that several providers of video conferencing services already experience difficulties because their digital infrastructure wasn't scaled to meet the sudden surge in demand created by covid-19. You are expected to test the service with the operator representative and foresee a back-up plan ahead of any virtual meeting. Additionally, if, despite the tests previously conducted, the technology starts degrading during the audit to the point where video and/or audio quality is compromised, the audit should be paused until the issue has been resolved, even if this means that segment of the audit will have to be continued in another day. Planning for an additional day to cover such possible contingencies is recommended.

Adequate internet access is also required. The operator must have the broad bandwidth to reliably transmit video and audio for this type of audit. This must be available at each location in their facility that the auditor will need to visit including on board the aircraft during the inspection, for audits where access to hangars and aircraft is possible; and for each person that will need to be interviewed, wherever they are located during the audit. This can be challenging for some operators that have the aircraft parked on the ramp or do not have wireless internet access in the hangar.

Interviews of front-line personnel are still required during a remote audit. It is important to ascertain the overall culture of the organization to the best extent possible. If the operator is not able to provide you visual access to the employees due to technical logistics, ask them to provide you with a list of employees and their phone numbers. Ask for this list to exceed the number of interviews that you intend to conduct so that you can choose someone at random from the list for the interview. Video conferences are expected and should always have overriding priority over any other way of interviewing operator personnel. Seeing people's reaction to questions and dialogue provides valuable information to aid in performing an audit, in building confidence, and in keeping the whole experience as human and mutually valuable as possible. Also plan on spending a few minutes to set both the scene and the mood with some informal talk. Keep it professional but try adding a little of your own 'voice' to give the person on the other side of the line a sense of who you are the context and purpose of the interview, just as they would have in a face-to-face meeting. Auditing is a profoundly social activity and must remain so regardless of the geographical distance.

Ask the operator to inform the employees that they might get a call from an auditor and that it is okay for them to talk candidly with you. Be sure to ask the operator to provide phone numbers for employees that you can call without disturbing anyone who is on a rest period.

Do not lose sight of the possibility that health issues may suddenly arise on all sides and severely disrupt the audit plan, possibly at the last minute. Contingency plans and alternatives should be considered and ideally be included in the written agreement between the auditor(s) and the operator.