2020/5 APPLICATION OF EXTENUATING CIRCUMSTANCES TO THE IMPACT OF COVID-19

The conditions for the application of extenuating circumstances are outlined in paragraph 2.10 of the ISAGO Program Manual (GOPM) as amended by Temporary Revision 1 that came into effect on 25 March 2020.

The TR extends the application of extenuating circumstances to a renewal audit that could not/cannot take place because of the impact of the COVID-19 outbreak. At this time, extenuating circumstances will be applied to ISAGO Registrations and Station Accreditations with expiry dates occurring up to 1 July 2020 and COVID-19 has prevented the timely scheduling of the renewal audit. There is no need, yet, to include ISAGO Registrations and Station Accreditations with later expiry dates but we will review the situation frequently and extend the extenuating circumstances application period if necessary.

In view of the current situation, COVID-19 could prevent the closure of findings and therefore would be a legitimate claim under the pre-existing extenuating circumstances prior to the issue of the TR. Another scenario has also emerged whereby the quality checks performed by IATA after audit closure could result in findings and there is still be work to do (by you or the auditor). COVID-19 could also prevent the closure of QC findings and therefore would also be considered a legitimate claim.

The attachment to this Bulletin provides guidelines on how extenuating circumstances will be applied in the three scenarios described above.

We have made the application of extenuating circumstances as easy and as less a burden on you as possible during these difficult times. We also believe that the reporting scheme, in the absence of a renewal audit, maintains the integrity of the program and will prove useful to you and your customer airlines throughout the period of extenuating circumstances.

These are the measures for now, and in the short term. Until we know more clearly how the crisis will play-out we will monitor developments and revise the measures as necessary.

Please contact us if you have any questions.

Approved by: Paul Fleming, Head, Ground Ops Audits

Date: 31 March 2020
GSP Bulletins currently in force:

2018/7  15 June 2018, Corrective Action Records
2018/9  16 August 2018, Guidelines for Auditees - ISAGO Audit Software User Manual & ISAGO Audit Follow-Up Activities
2019/1  2 January 2019, GOPM Edition 2
2019/4  17 May 2019, Temporary Revision 1 to GOSM Edition 8
2019/5  10 October 2019, ISAGO Registration/Station Accreditation Press Releases and Use of IATA Brand and ISAGO Logos
2019/7  20 December 2019, Audit Allocation 2020
2020/5  31 March 2020, Application of Extenuating Circumstances to the Impact of COVID-19
ATTACHMENT TO GSP BULLETIN 2020/5

APPLICATION OF EXTENUATING CIRCUMSTANCES TO THE IMPACT OF COVID-19

The terms and conditions of your Audit Agreement with IATA and the GOPM (Edition 2 as amended by TR1) shall apply. In accordance with GOPM (TR1) 2.10.4 the ISAGO Registration and the Accreditation of Stations (as applicable) will remain valid while the claim is being addressed.

Extenuating circumstances do not apply to an initial audit that has not been conducted. The audit is simply postponed.

1. Application of extenuating circumstances if it is not possible to undergo or complete a renewal ISAGO audit due to conditions and limitations related to and/or caused by the COVID-19 outbreak
   1.1. You do not need to notify IATA. We are aware that your renewal audit has been postponed.
   1.2. If you have an ISAGO Registration or Station Accreditation that is due to expire, at this time, up to 1 July 2020, you will receive an email from IATA, copied to the assigned ISAGO Agent,
   1.3. The email will confirm that your audit has been postponed because of COVID-19 and that extenuating circumstances apply. The email will specify the date that the extenuating circumstances will end and what you are required to do until then, including the submission of an Extenuating Circumstances Questionnaire.
   1.4. The Extenuating Circumstances Questionnaire will be attached to the email. You shall submit the questionnaire to IATA on the day that the extenuating circumstances started, as specified in the email. You shall submit an updated Extenuating Circumstances Questionnaire at any time a change in its content occurs but no less than on the same day of every 2nd consecutive month until the extenuating circumstances no longer apply. Remind yourself to do this as failure may affect the continuation of the extenuating circumstances.
   1.5. You should endeavour to conform to the applicable ISAGO Standards during the period of extenuating circumstances. You will not be penalized if you are not able to conform under the circumstances. However, we request that you report any non-conformity with the ISAGO Standards that are specified in the Extenuating Circumstances Questionnaire.
   1.6. IATA will annotate your entry in the ISAGO Registry related to the ISAGO Registration or Station Accreditation as applicable in accordance with GOPM Table 2.1.

2. Application of extenuating circumstances if it is not possible for you to complete the follow-up activities to close an ISAGO audit within the required time due to conditions and limitations related to and/or caused by the COVID-19 outbreak
   2.1. You do not need to notify IATA.
   2.2. You will have already started the follow-up activities to close all findings related to the audit and we understand that you would want to close the audit in the required time. You will receive an email from IATA, copied to the ISAGO Agent and the audit team. The email will ask you if you are experiencing difficulties and, if so, the reason why you cannot work on closing the findings.
   2.3. IATA will follow-up on your response. IATA will also act upon any notification or information received from the audit team, who should be in contact with you, or the ISAGO Agent.
   2.4. You will receive a second email from IATA that will specify the date that the extenuating circumstances, if applicable, will end. The audit software will be updated accordingly.
   2.5. The purpose of granting extenuating circumstances is to give you more time in which to close all findings. During this time, you should keep the audit team aware of your progress. Do not leave it to the last minute to report that you are still experiencing difficulties and may not be able to meet the deadline.
2.6. IATA will annotate your entry in the ISAGO Registry related to the ISAGO Registration or Station Accreditation as applicable in accordance with GOPM Table 2.1.

2.7. It is possible that one or more members of the audit team that conducted your audit is/are unable to complete the follow-up activities due to COVID-19. In this case, IATA will notify you and seek an alternative means of closing the audit from the auditor perspective. You should continue your work to close the findings.

3. Application of extenuating circumstances if it is not possible for the audit report to be approved because work identified by the IATA quality control checks needs to be completed

3.1. You do not need to notify IATA.

3.2. This scenario will only apply to you if IATA QC identifies a finding(s) against your audit software entries.

3.3. You will receive an email from IATA, copied to the ISAGO Agent and the audit team. The email will ask you if you are experiencing difficulties and, if so, the reason why you cannot work on closing the QC finding(s).

3.4. IATA will follow-up on your response.

3.5. You will receive a second email from IATA that will specify the date that the extenuating circumstances, if applicable, will end.

3.6. IATA will annotate your entry in the ISAGO Registry related to the ISAGO Registration or Station Accreditation as applicable in accordance with GOPM Table 2.1.

3.7. A similar, less likely, scenario exists if one of the audit team that conducted your audit is unable to address a QC finding due to COVID-19. In this case, IATA will notify you and seek an alternative means of addressing the finding.

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