Jordan Civil Aviation Regulatory Commission

Guidance Procedure: AWS 05

Remote and Desktop Surveillance Activities Guidance Procedure

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0. Introduction

In order to facilitate safe operations during the COVID-19 Pandemic and in line with ICAO Document 10144 "ICAO Handbook for CAAs on the Management of Aviation Safety Risks related to COVID-19" requirements, Jordanian Civil Aviation Regulatory Commission (CARC) provides the necessary flexibility by promulgating temporary contingency operational measures, while adhering to its obligations under the Convention of the International Civil Aviation (Chicago Convention, Doc 7300), based on contingency measures in place and on urgent needs demonstrated by a Jordanian operator or service provider before 31 March 2021.

Remote and desktop surveillance is described in ICAO Document 10144, the value of this audit method resides in its potential to provide flexibility to achieving the audit objectives.

In order to realize the benefits of this audit method, all interested parties should be aware of their role in the process, inputs, expected outputs, risks and opportunities that will provide the basis to achieve the audit and audit program objectives.

There are a variety of reasons that CARC airworthiness standards inspectors may not be present due to safety constraints, pandemics or travel restrictions. The voluntary or mandatory confinement due to the current COVID19 pandemic is an example where auditing remotely is beneficial.

New information and communication technologies (ICT) have made remote auditing more feasible, as access to ICT has increased, remote auditing has become more commonly used. This allows the auditor to communicate with people globally, accessing a wide range of information and data.

0.1. Abbreviations

AMO	:	Approved Maintenance Organization
CARC	:	Jordan Civil Aviation Regulatory Commission
CAMO	:	Continuing Airworthiness Management Organization
JCAR	:	Jordan Civil Aviation Regulation
ICT	:	Information and Communication Technologies
MTO	:	Approved Maintenance Training Organization
TCH	:	Type Certificate Holder

0.2. Purpose

This guidance procedure is designed to be used by AWSD management and CARC airworthiness standards inspectors when:

a. Evaluating compliance with JCARs.

b. To establishes common technical requirements and administrative procedures for the initial, renewal or change of approval/ acceptance of foreign maintenance organization, , Jordanian maintenance line station located outside Jordan, foreign maintenance training organizations, CARC approved continuing airworthiness management organization located outside Jordan, foreign type certificate holder and de-registration of Jordanian registered aircraft located outside Jordan.

c. Management and monitoring of CARC approvals/ acceptance in light of the flexibility needed across the aviation system to continue safe operations, based on contingency measures in place and on urgent needs demonstrated by Jordanian operators and service providers before 31 March 2021.

0.3.   Distribution

This guidance procedure should be published on CARC official website. The holders of this guidance procedure are CARC airworthiness standards inspectors.

0.4.   Amendments

This guidance procedure will be reviewed each time there is a regulation change that affects it and as long as it is considered necessary by CARC.

Any amendment to this guidance procedure will go through CARC's document control procedure; the amendment should be approved by the Chief Commissioner/CEO and becomes effective only after incorporation to this procedure and publishing it on CARC official website. Entry into force and application of this Guidance Procedure shall enter into force on the twentieth day following that of its publication in CARC Official Website.

0.5.   Competent Authority

CARC is the competent authority designated, where the operator or service provider has its principal place of business or, where the operator or operator has no principal place of business, the place where the operator or service provider is established or resides.

0.6.   Demonstration of Compliance

An operator or service provider shall, when so requested by CARC, demonstrate compliance with the essential requirements set out in JCARs Part-M, Part-21, Part-CS, Part-145, Part-147, Part-66, Part-47 regulations "as amended" and with the requirements of this guidance procedure.

1.   Objective and scope applicability

1.1   This guidance procedure is applicable to the initial, renewal or change of CARC approved/ accepted foreign maintenance organizations (Part 145 and M Subpart F Maintenance Organizations), foreign maintenance training organizations, CARC approved continuing airworthiness management organization located outside Jordan, Jordanian maintenance line station located outside Jordan, foreign type certificate holder, the provisions of this guidance procedure are complementary to the requirements of JCAR Part-M, Part-21, Part-CS, Part-145, Part-147, Part-66 and Part-47 regulations "as amended" and does not supersede or replace the associated regulatory requirements.

1.2   This guidance procedure establishes common technical requirements and administrative procedures for the initial, renewal or change of approval/ acceptance of foreign maintenance organization, Jordanian maintenance line station located outside Jordan, foreign maintenance training organizations, CARC approved continuing airworthiness management organization located outside Jordan, foreign type certificate holder and de-registration of Jordanian registered aircraft located outside Jordan.

1.3   This guidance procedure is based on contingency measures in place and on urgent needs by Jordanian operators and service providers until 31 March 2021.

2. Identification, Collection and Analysis of Relevant and Available Data and Information

2.1   CARC airworthiness standards inspector should try to gather as much as possible data and information, collecting available data will enable analysis and the development of information to support the data-driven decision-making process and help to support the management of safety risks and a better understanding of the impacts that any decision will have on aviation.

2.2   To collect the relevant data and information, CARC airworthiness standards inspectors are encouraged to establish an open and continuous dialogue with all operators and service providers.

2.3   CARC airworthiness standards inspectors are encouraged to ensure that the collected data and information can be updated frequently in order to better understand how the operators and service providers are coping with the situation, the data collected should be used in the application of a risk management approach.

3. Adapting Oversight and Surveillance Activities

3.1   CARC is managing the safety risks as a result of the COVID-19 pandemic with existing capabilities or develop new capabilities as needed. Examples of potential new capabilities include conducting surveillance activities remotely and using digital platforms to communicate more tactically.

3.2   Throughout all the stages CARC will cooperate, collaborate and communicate with operators and service provides. The aviation community recognizes "we are all in this together" to safeguard the viability and the stability of the aviation sector.

3.3   CARC will need to monitor resources and continuously assess their capacity to fulfil safety oversight obligations as this will vary throughout the different stages of the pandemic. CARC needs to consider human factors when assessing such impacts.

3.4   CARC is considering their own staff's health and well-being, even without State restrictions, CARC is reducing non-essential movements and encouraging remote working. This may also require staff to work from home, impacting the ability to conduct the same level of on-site oversight activities.

3.5   A review of surveillance programs and some flexibility around scheduled audits is required, consideration should be given to carrying out desktop reviews and video conferencing to supplement planned on-site surveillance activities. This will also reduce inspectors exposure to people and organizations' staff at a high risk.

3.6   State restrictions on travel movements will impact CARC and the aviation industry, CARC should be reviewing and amending their surveillance plans to minimize movement and physical contact with staff in aviation organizations.

3.7   Challenges related to the level of oversight that can be provided should consider a safety risk management approach to decide what should be done and what can be postponed. As some service providers start to operate at a reduced capacity, this may result in increase of monitoring of risks.

3.8   Even if the travel restrictions are lifted, there will be challenges for the industry to ramp up operations and restart. This may require CARC to prioritize and adjust oversight activities to ensure that the restart is done safely and that any risks identified are being managed appropriately by operators and service providers. This may require further flexibility in surveillance programs even when restarting the aviation system.

3.9   During restrictions on movement, routine on-site surveillance may not be possible, surveillance should be based on a safety risk management approach. Remote and desktop surveillance activities may be performed to carry out a review of documents, procedures and evidence of activities, records and risk registers.

3.10   Checklists could be provided by operators and service providers, with evidence of compliance provided by the organization itself. Audits can be conducted via teleconference and adjusted to the operations of the service providers. This will likely be the only method of direct communication with a service provider. Time should be prioritized in discussing changes, safety risks and hazards to ensure that the service provider is carrying out effective hazard identification.

4. Considerations for the use of Remote Auditing Techniques

4.1   Feasibility

The use of Information and Communication Technologies (ICT) for remote auditing will only be successful if the right conditions are in place. The fundamental ones are that technology is available and that both auditors and auditees are competent and at ease with its operation, this should be assessed prior to the decision to use remote techniques, this preparation contributes to optimizing the audit process.

4.2   Confidentiality, Security and Data Protection

Critical to the use of Information and Communication Technologies (ICT) are confidentiality and security issues, as well as data protection. The assigned inspector and the organization should take into consideration legislation and regulations, which may require additional agreements from both sides.

4.3   Risk Assessment

The risks for achieving the audit objectives should be identified, assessed and managed, another important issue is to understand what processes, activities or sites of the organization may be audited remotely with which ICT tool available. This decision should be based on the documented identification of the risks and opportunities that may impact the audit/assessment, for each ICT considered. This assessment should be done and documented for each audit involving all members of the audit team and the audited organization representative, any specific arrangements should be documented and communicated between relevant interested parties.

4.4   Audit Planning

Audit planning should consider the following:

a.   to assess and document feasibility and risks with the auditee;

b.   to determine the different ICT used and how they will be used;

c.   to define the agenda that may need to accommodate dispositions different from an onsite audit (e.g. better definition of tasks by different team members to ensure auditors audit separately and make best use of time, more detailed definition of themes to be handled in different time slots which will require a better and previous understanding of the processes of the organization, etc.);

d.   to allow the organization to identify the people to be audited and ensure their availability at defined time; and

e.   to preview a test on the use of ICT before the audit to confirm that there is a stable connection and people know how to use the technology.

After analyzing risks and opportunities, provide the basis for defining what processes to be audited under what ICT. The auditor should confirm with the organization the feasibility of the remote audit method proposed at the program, based on the required ICT and his knowledge of

the organization. This includes the verification that the people involved will know how to use the tool, the auditor reviews the risk and opportunities determined in light of this specific audit and its objectives and may propose changes to the determined use of ICT.

All other potential situations should be addressed by appropriate measures to be reflected as needed in the audit plan. Despite using remote auditing methods, the confidence that the desired audit objectives will be reached must be kept. The plan should clearly identify what, when and how the audit will be conducted.

4.5   Audit Realization

When revising the audit plan at opening meeting the availability and feasibility to use ICT should be confirmed. Measures to ensure confidentiality and security should also be revised and agreed. If the auditor intends to take screen shots copies of documents or other kind of records he should ask for permission, either at opening meeting or when using ICT. When using ICT to interview individuals the audit team should record the name and function of the interviewed people and tell them what information is being retained. When conducting interviews remotely, the auditor will need to verify statements of facts against other evidences. These need to be asked and analyzed by the auditor. If they are sent via email, the auditor should ensure the level of confidentiality required for those documents. It is also important to ensure that there is no noise disturbing the communication. If the auditor is auditing remotely off site, it should ensure there are no interruptions nor disturbance. Similarly, when there are breaks, ensure the sound is mute and image switched off to ensure privacy. When using video for watching online live images of remote sites it is important that the organization demonstrates veracity of images, in a remote audit it is important to allow for small breaks, it is also acceptable for the auditor to inform the auditee when an interruption is required to read and analyze information that has been provided, this allows for increased understanding of the documentation and evidence that has been presented and for determination of additional questions prior to reconvening the interview. If time is consumed on issues such as network downtime, unexpected interruptions or delays, accessibility problems or other ICT challenges, this time should not be counted as audit time.

4.6   Audit Conclusion

Audit report should clearly state the extent of use of ICT as well as the effectiveness of its use in achieving audit objectives. The report should indicate those processes that could not be audited and should have been audited on-site. This information is important for the decision process and subsequent audits.