

## **White Paper: Challenges Faced by IATA Related to the Lack of Contributing Factors in Audit Follow-Up Activities**

Steve Bentley FRAeS CEO of Sofema Raises a significant issue related to the different audit closure methodology between IATA ISAGO and EASA Forthcoming Ground Handling Regulations.

### **Executive Summary**

While the International Air Transport Association (IATA) places strong emphasis on addressing root causes of non-conformities within its ISAGO Audit Follow-Up Activities, recent developments within the European Aviation Safety Agency (EASA) underscore the critical importance of also addressing contributing factors.

EASA now explicitly recognizes both Root Causes and Contributing Factors in audit findings and corrective action plans. This paper discusses the existing approach taken by IATA and highlights the inherent challenges IATA faces as it aligns its audit practices to meet evolving regulatory expectations.

### **EASA - AMC1 ORGH.GEN.150(b) Findings and corrective actions**

#### **GENERAL**

(a) The corrective action plan defined by the organisation providing GH services should address the effects of the non-compliance, as well as its root cause(s) and contributing factors(s).

#### **Current IATA ISAGO Audit Framework**

IATA's current ISAGO guidelines focus primarily on the identification and rectification of root causes for each non-conformity recorded in Corrective Action Records (CARs). The manual clearly delineates the necessity of identifying root causes but does not provide equivalent emphasis on contributing factors. Although it allows for "indirect" causes or contributory elements to be considered, this consideration remains secondary and optional.

#### **For example, IATA's guidance explicitly states:**

"The Root Cause(s) must be directly related to the reason for the non-conformity, or can be indirectly related if there are contributory factors and corrective action has to also address them to achieve full and lasting conformity."

However, in practical terms, auditors are typically oriented to identify singular, definitive root causes, often overlooking the complexity and significance of contributory elements.

#### **Evolution of Regulatory Expectations – EASA Perspective**

Contrasting with IATA, EASA has progressed significantly, mandating comprehensive corrective actions that explicitly incorporate both root causes and contributing factors.

This reflects a broader understanding of safety management, recognizing that contributing factors—such as organizational culture, human performance issues, and procedural deviations—play pivotal roles in systemic safety.

By adopting this holistic approach, EASA expects aviation organizations to achieve deeper, systemic improvements, reducing recurrence of non-conformities more effectively than by focusing solely on immediate root causes.

### **Challenges for IATA in Addressing Contributing Factors**

**Methodological Gaps** - IATA's established procedures prioritize root causes as singular, primary issues. Introducing contributing factors would necessitate a revision of existing procedures, audit software workflows (Intelex), and auditor training. Such changes require substantial investment and adjustments within the organizational structure of ISAGO operations.

**Training and Competence of Auditors** - Addressing contributing factors requires auditors to possess advanced analytical skills, a nuanced understanding of organizational psychology, and systemic thinking competencies. Currently, IATA auditor training emphasizes clear-cut, direct causal analysis, which might inadequately equip auditors for handling complex contributory scenarios without further extensive training.

**Documentation and Reporting Complexity** - Incorporating contributing factors into ISAGO CARs will significantly expand documentation requirements.

- Evidence-based substantiation would become more demanding, lengthening the audit follow-up process, potentially leading to increased administrative burdens for both auditors and audited entities.

**Potential Resistance from Stakeholders** - Auditees accustomed to simpler root-cause focused audits might resist expanded analyses due to the associated resource implications. IATA must carefully manage stakeholder expectations and clearly communicate the long-term safety benefits to overcome initial reluctance.

**Demonstrating the Need – Evidences from Audit Practices** - Analysis of recurrent audit findings within the aviation industry indicates that many issues labeled as root causes frequently reoccur because underlying contributory factors remain unresolved.

- For instance, recurring issues such as inadequate documentation or communication breakdowns often reflect deeper systemic issues like organizational

culture or supervision deficiencies. By ignoring these contributing factors, IATA's current framework risks perpetuating non-conformities.

## **Moving Forward – Recommendations**

To align with evolving regulatory best practices as demonstrated by EASA, IATA should consider the following strategic steps:

- Revise the ISAGO audit framework explicitly to incorporate contributing factors.
- Enhance auditor training programs to build expertise in identifying and documenting contributing factors.
- Update audit software systems to systematically document and analyze both root causes and contributing factors.
- Conduct pilot studies demonstrating the improved effectiveness of addressing contributing factors, using this data to secure stakeholder buy-in.

## **Conclusion**

Our aviation industry continually evolves to embrace more robust safety management principles. For IATA, addressing contributing factors within ISAGO audits represents a logical and necessary progression.

By overcoming methodological, training, and procedural challenges, IATA can strengthen audit effectiveness, ultimately enhancing safety performance and reducing systemic risk.

The experience and evolution within EASA offer valuable benchmarks and a pathway forward, underscoring the critical importance of comprehensive causal analysis in aviation safety management.

Sofema Aviation Services ([www.sassofia.com](http://www.sassofia.com)) & Sofema Online ([www.sofemaonline.com](http://www.sofemaonline.com)) together offer over 1000 - EASA, FAA & Leading Regulatory Authority Compliant and Vocational Training as Classroom, Webinar & Online Short Courses.

For additional information please see the websites or email [team@sassofia.com](mailto:team@sassofia.com)