



Compliance Management: Managing regulatory changes of EASA- and ICAO-regulations

Whitepaper

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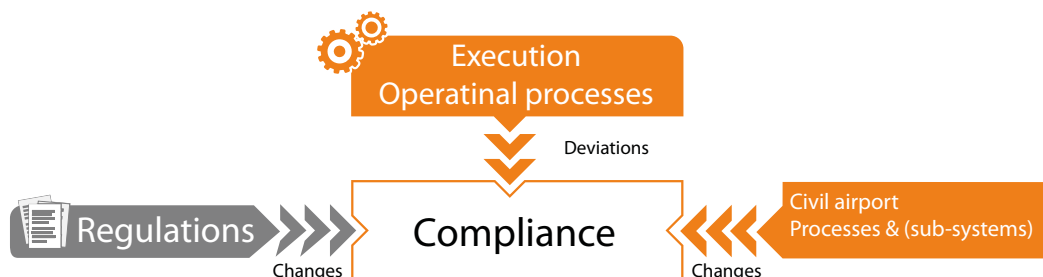
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1 Introduction

Compliance management is a continuous task, which an organisation must perform in accordance with regulations, in order to maintain compliance in the long term.

The maintenance of compliance requires a change management for regulations on the one hand and for procedures and systems on the other hand. Deviations during the execution of procedures processes (incidents, routine checks, audits, etc.), which impact on the level of compliance, must also be taken into account.



The changes to the regulations are precisely defined and standardised and can be provided as change packages for the compliance management module. When a change package has been processed, the regulatory changes can be processed and regulated with software support.

This process is demonstrated in this white paper, using the example of the minor regulatory change “Annex to Decision 2016/009/R”.

It is of course not possible for us to foresee which regulations require consideration in terms of individual changes to airport procedures and systems, which can also have a considerable impact on the level of compliance. In this case the change package must be compiled by the airport itself. Further steps can then be taken in line with the procedure described here and supported by software.

Deviations during operational procedures also have a negative impact on the level of compliance. eControl supports the workflow of the airport, makes available evaluation procedures, a measure management and many other tools to identify and minimise deviations. These modules are, where necessary, linked to the regulatory requirements and make it easier to substantiate compliance management.

However, this white paper does not deal with the impact of operational procedures on the level of compliance.

1.1 Step 1: Regulatory changes come into force

As soon as regulatory changes have legal force and will therefore have to be complied with from some future date, the eControl compliance team analyses the effects on the structure and content of the legal framework.

1.2 Step 2: Analysis of changes

In the event of a change in the legal framework

- **existing requirements** are changed,
- **additional requirements** are added and
- **requirements due to expire in the future** are discontinued.

In addition the reorganisation of parts of the legal framework must be taken into account, which are referred to separately. The possibility cannot be ruled out that this restructuring may require some manual reworking of evidence-based documentation by the customer.

1.3 Step 3: Automation of change

The manufacturer supports the updating of the requirements filed in eControl by means of customized database scripts.

1.4 Step 4: Consultation of release notes

For all requirements that are affected by the change to the legal framework, appropriate release notes are automatically generated.

The release notes contain the following information:

- Version
- Version title
- Time of commencement

Version	Qualification events			
Version ID:	2942			
Version:	2.0 [Annex to Decision 2016/009/R]	Effective from:	25.05.2016	X
Version title:	2.0 [Annex to Decision 2016/009/R]			
Note:	<p>from ICAO Doc 9137, Part 1 (Fourth Edition), thereby fulfilling the European Union (EU)'s commitment to support Member States (MSs) to meet their obligations towards ICAO.</p> <p>This Decision introduces changes to the existing acceptable means of compliance (AMC) and guidance material (GM) annexed to ED Decision 2014/012/R. More specifically, it:</p> <p>introduces a new method of determining the rescue and firefighting (RFF) level of protection required for all-cargo, mail, ferry, training, test and end-of-life aeroplane operations;</p> <p>provides a common methodology for reducing the RFF level of protection;</p> <p>provides a methodology for calculating the required quantities of extinguishing agents;</p> <p>clarifies the role and responsibilities of RFFS; and</p> <p>strengthens the requirements for the maintenance of RFF vehicles and equipment, by including them in the aerodrome maintenance programme.</p> <p>The proposed changes are expected to maintain a high level of safety, increase the cost-effectiveness of the existing AMC/GM applicable to aerodromes and their operators, strengthen harmonisation across MSs and ensure compliance with ICAO.</p>			
Created at/by:	25.05.2016	Espenhain, Frank		
Checked by/at:				
Approved at/by:				
Created on/by:	19.07.2016 16:47, SMS			
Changed on/by:	19.07.2016 16:47, SMS			

1.5 Step 5: Documenting effects of changes for each requirement

A workable procedure is required to systematically process the changes applied to rules over time and to conduct a full verification thereof.

Two new data fields are provided as standard for all changed requirements in order that each change can be processed:

- **Status field** for workflow management
- **Note field**

The activities performed and further notes should be documented in the note field. Both data fieldscan, where necessary, be supplemented by customer-specific attributes.

The screenshot displays the 'Process management' interface with the 'Attributes' tab selected. The process path is '09902018 • EXTINGUISHING AGENTS / (k) • Order AMC4 ADR.OPS.B.010(a)(2) / (k)'. The interface is divided into two main sections: 'EASA Compliance Part' and 'EASA Release management'.

EASA Compliance Part

Attribute	Value
EASA Component Node Type	Sub-requirement
EASA Component Certification Basis	Yes
EASA Component Applicability	Yes
EASA Component Degree of Fulfilment	fulfilled
EASA Component Proof	See tables FFE-2 See operational planning FF-HAM-A No changes to Annex to Decision 2016/009/R necessary
EASA Component Proof Status	sufficient
EASA Component Organization Building Component/(Sub-)System 1	
EASA Component Organization Building Component/(Sub-)System 2	
EASA Component Organization Building Component/(Sub-)System 3	
EASA Component Organization Building Component/(Sub-)System 4	
EASA Component Organization Building Component/(Sub-)System 5	

EASA Release management

Attribute	Value
Annex to Decision 2016/009/R - Status	Completed
Annex to Decision 2016/009/R - Note	Complementary resources stocking checked, no needs for action

1.6 Step 6: Evidence-based compliance documents

Essentially, when the requirements are updated by the manufacturer, no changes are made to evidence-based information collected by customers. Information such as compliance status, applicability, verification procedures, etc. remain available and are not subject to any restrictions. Duplication of data is not required for the new version of the requirements.

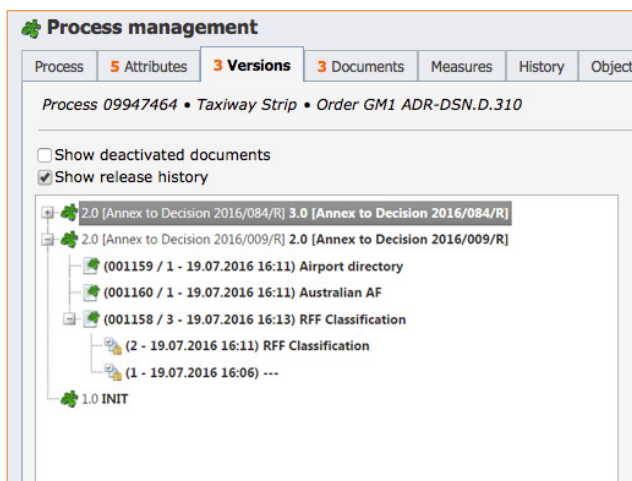
eControl focuses on the current compliance status. Older databases can be easily tracked with the help of the process history.

To enable milestones, such as for example the formal handover of supporting documents to the competent authorities, to be easily tracked, it is recommended to save the compliance sheets generated by eControl as PDFs with each requirement.

With eControl as many documents as desired can be archived for each requirement and clearly structured with the help of document categories. In this way, for example, related correspondence and discussion outcomes can also be included.

1.7 Step 7: Supporting documents

With eControl it is at all times easy to identify which documents have been used for compliance testing as well as when and in the context of which changes they have been used.



Old document versions can be seen irrespective of the version or change in question.

In this example

- 1159 – Airport directory
- 1160 – Australian AF und
- 1158 – RFF Classification

were used to support the version "Annex to Decision 2016/009/R". Document 1158 was updated several times and Version 3 of 19.07.2016 16:13 is the relevant supporting document in this case.

In the current context the most important thing is to easily distinguish which documents were allocated before the change and thus require verification.

1.8 Step 8: Allocation of permissions for new requirements

For requirements newly created in the context of the version, it must be specified which users are allowed to view and, if necessary, process, which elements of these requirements.

eControl provides the dialogue

“Settings / Master data / Process management / Authorisation management”

in order that this activity can be performed quickly and easily.

The supplemented requirements can be filtered, as shown in the example. The template can be saved according to the system standard and used again by other users.

1.9 Step 9: Monitoring of expired requirements

In order to ensure that the responsible manager remains able to see the existing supporting documents and evidence-based information, the software does not provide for any automatic discontinuation of (regulatory) expired requirements.

Expired requirements may be supported by evidence-based documents and information, which can be used again in the future, particularly in the reorganisation of regulations. Expired requirements are therefore marked with an additional text and can be easily filtered.

1.10 Step 10: Compliance for new and changed requirements

This step describes the actual processing of individual requirements.

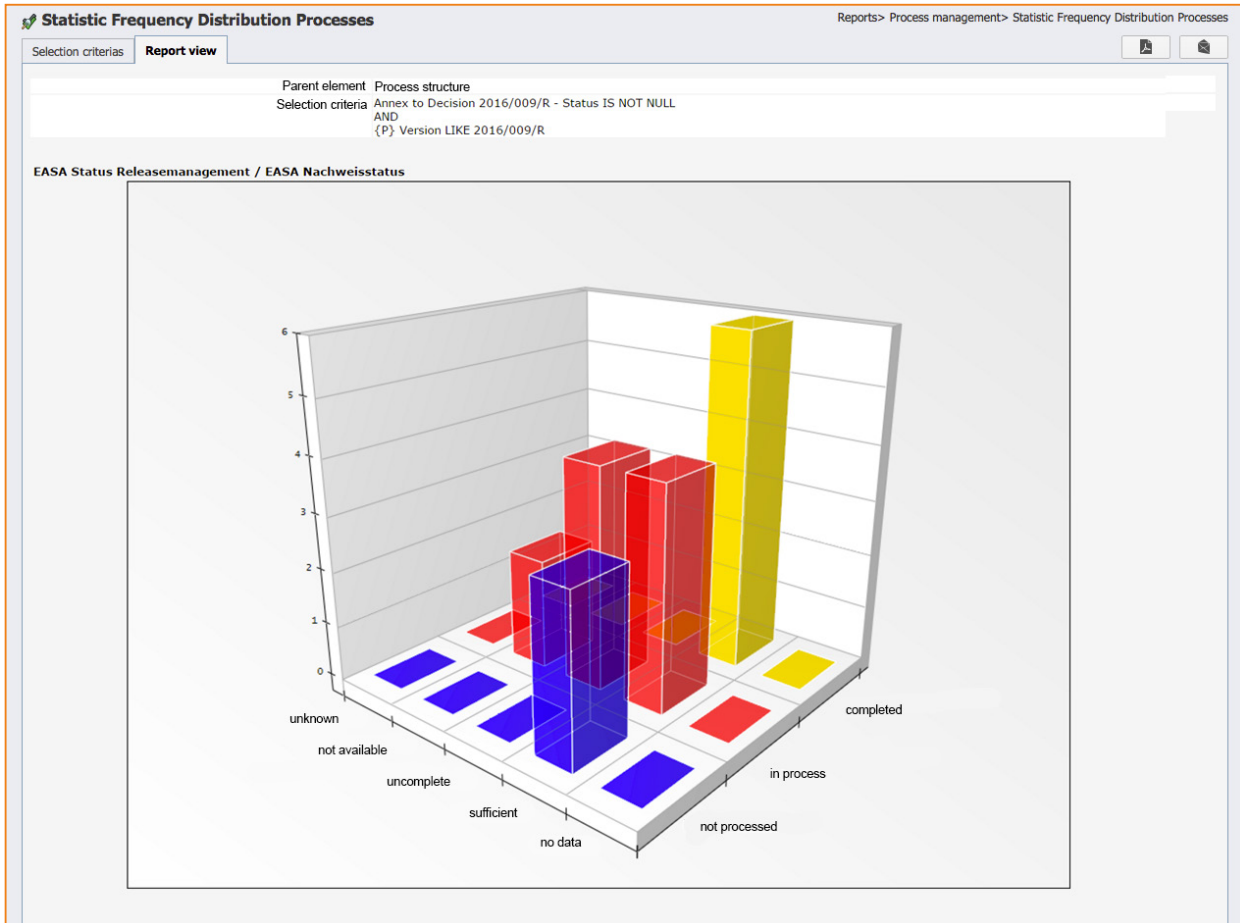
Depending on the change in question, change measures must be initiated. The supporting documents must, where necessary, be completed with regard to the changed requirement or it must at least be noted why no changes are necessary for a changed requirement.

The processing of expired requirements is structured as follows:

- 1 Requirement is no longer needed**
- 2 Requirement is marked with a deletion note by the manufacturer (Arconda Systems AG)**
- 3 Customer checks data and documents**
- 4 Data and documents are – insofar as is reasonable – allocated to other requirements for compliance testing**
- 5 Customer discontinues the requirement and records appropriate release notes**

1.11 Step 11: Monitoring of progress in the processing of extensive changes

Depending on the version, a large number of requirements may need revision by several different specialised departments. Here, the project manager has the support of eControl's standard toolkit. By way of example, the processing status and the quality of the supporting documents is compared below.



With eControl, any desired data fields/attributes with customer-specific value ranges such as **priority**, **quarter** and **area** can be generated and used for any number of statistical analyses.

1.12 Step 12: Provision of updated evidence-based compliance documents

To prove compliance to third parties, eControl provides the compliance sheet, which merges all selected target group-specific information for the current version of a requirement and of all subsidiary conditions.

This compliance sheet can be sent on request as a PDF together with all selected documents as an e-mail or provided as a zip file for download.

1.13 Final step: Adapting of monitoring programs

The audit programme and any established routine checks must, where necessary, be adapted to the changed regulatory conditions.

eControl

Process
Management

Operation
Management

Safety
Management

Audit
Management

Qualification
Management

Compliance
Management

Environmental Bird Control
Management

Customers:



District
Government of
Upper Bavaria



Customers international:

