ANNEX A to Multi-Part   
AC 119-07 and AC 138-03 v2.4

Management of change for aviation organisations without SMS

Sample template

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# Introduction

## Template guidance

This sample management of change template is for an organisation that conducts operations under both Part 119 and Part 138 of CASR and have not yet implemented an SMS[[1]](#footnote-1).

The sample management of change template in section 2 of this Annex was prepared with the concept that the organisation has an individual appointed to the position of Safety Manager (SM). Where an organisation does not currently have an individual in this position, any reference to SM in the template should be replaced with another senior position. For many organisations this may be the HOFO/HOO.

The template is designed for a fictional 'Sample Aviation', which is a company of approximately 10 staff members comprising:

* Key Person 1 – the individual holding the key person position of CEO.
* Key Person 2 – the individual holding the key person positions HOFO (119) HOO 138, HOTC (119).
* Key Person 3 – the individual holding the key person position of Safety Manager (SM).
* Five line pilots.
* One office support staff member (all support duties from rostering to admin/pay etc).
* One ground support staff member who conducts all ground duties e.g. marshalling, baggage handling courier duties etc.

In a small organisation such as Sample Aviation, the CEO is the change approver for all changes. Some larger industry organisations may prefer to delegate the change approver function to lower levels in the management structure for certain changes. This is an operator choice, and the regulations do not prescribe who is required to conduct this function; however, the process is required to be described in the exposition.

Sample Aviation uses a single group of publications defined as an exposition for the compliance requirements of Part 119 of CASR. This set of documents is also used to fulfil its requirements for an 'operations manual' under Part 138 of CASR. Where this template is adapted for an operator who is operating solely under Part 138 of CASR then all references to exposition are interchangeable/replaceable with the term 'operations manual'.

Should Sample Aviation be required to implement an SMS under Part 119 or Part 138 of CASR it would be appropriate to amalgamate the management of change process detailed in their exposition with the Management of Change process detailed in the SMS.

If used, this template will enable the operator to meet the requirements of Parts 119 and 138 of CASR (as applicable) for a management of change process. However, operators may need to adjust the language of the template to be consistent with their operation, including changes to terms such as exposition and operations manual. Additional guidance in the footnotes of the document may be deleted as part of the updates to relevant text.

# Sample template

## Flow chart sample

The following illustration at Figure 1 shows the process workflow for the Sample Aviation management of change process. The detailed process template follows:

**Determine if the change is significant or non-significant**

**Need identified to change**

**Evaluation of the Change**

Assess the risks of the proposed change including any controls/mitigations being introduced with the change.

Draft amendments to Exposition/ Operations Manuals

\* Covered by the circumstances of any of the following subregulations:

* 119.090 (2),
* 138.062 (2) and (3),
* 141.085 (2) and (3),
* 142.140 (2) and (3)

**Significant**

**Change**

**Non-Significant Change**

Implement change and provide revised documentation to all personnel and CASA

Submit application to CASA for approval of Significant Change

Submit notification to CASA of Non-Significant Change

Risk level is acceptable to the operator

Further considerations required

Change of key personnel? \*

NO

YES

YES

The operator may implement the changes whilst awaiting application outcome

NO

Change approved?

NO

YES

Implement change and provide revised documentation to all personnel and CASA

Evaluation of change/ Continuous Improvement Process

Figure 1: Sample workflow process

## Sample governance

### Sample Aviation management of change - governance

Compliance

When actioning a proposed change, the management of change process flow in Figure 1 must be followed. Additional information on the associated methodology is outlined below.

All changes to company systems, processes, or procedures are to be made in accordance with this process.

Approval and administration

The CEO is the Change Approver for all Sample Aviation change proposals. This approval must be given prior to the implementation of any change proposal.

The Safety Manager (SM) is responsible for administrating the change process.

Need identified to change

Change can be initiated for many reasons including:

* new regulatory requirements
* audit report findings
* safety report findings
* continuous improvement process
* new business opportunities or new or different kinds of aircraft
* change of key personnel.

Where a change is suggested the CEO and SM will verify if this is a change that the operator wishes to action.

As part of considering the change it will be necessary to assess the risks of the proposed change considering at least, but not limited to:

* resource requirements
* compliance considerations
* urgency of change
* implementation implications and strategy
* impact on safety.

## Change process

Sample Aviation management change - process

Request for change raised.

CEO, HOFO and SM will discuss any proposed changes. A decision will be made on whether there is a need identified to implement the change.

Safety Manager to record a short summary of the change proposal in the company records[[2]](#footnote-2).

The Proposal enters the Evaluation phase:

* 1. Is the item an editorial matter, such as a spelling, format, incorrect word or number, where it is determined that there is no safety impact that would affect the current organisation risk treatments (i.e. does not require a formal assessment of risk)?
     1. If YES – subject to the approval of the CEO / Change Approver the change may proceed without consideration of risks. Proceed to step 6 (Significant /non-significant change)
     2. If NO – associated risks need to be considered[[3]](#footnote-3).
        1. Evaluation of the change may include internal and external stakeholders if considered appropriate.
        2. The evaluation should consider all the respective factors, including (but not limited to):
           1. number of affected stakeholders
           2. complexity of the proposal
           3. training requirements
           4. documentation changes required to support the change.
        3. The Safety Manager is responsible for facilitating and recording of outcomes and actions from the review of risks.

Consider the risk:

* 1. The CEO/change approver will review the documented risk level as part of their decision on whether to proceed with the change proposal.
  2. After considering all treatments and mitigations, the considerations of risk process should provide the CEO/change approver with a recommendation as to whether the change is considered to maintain, improve or is not likely to maintain or improve aviation safety.

Determine whether the change is significant or non-significant:

* 1. The CEO/change approver, HOFO and Safety Manager will consider the change proposal against the regulatory requirements of significant change:
     1. For the definition of significant change, refer to regulation 119.020 and 138.012 of CASR as applicable.
  2. The determination will include a review of whether the change proposal has a positive or negative affect on aviation safety.
  3. The change proposal must be classified as either:
     1. Non-Significant (paragraph 2.3.7 below)

or

* + 1. Significant (paragraph 2.3.8 below).

Non-significant change:

* 1. A non-significant change does not require CASA approval prior to implementation.

Note: A non-significant change that involves a change of company name, contact details or address, must be notified to CASA prior to implementation.

* 1. On authority of the CEO/change approver, the change may be implemented.
  2. A revised distribution of the exposition accompanied by an explanation of the changes must be provided to all staff members and to CASA as per the distribution process in the exposition.

Significant change:

* 1. A significant change requires CASA approval prior to implementation.
  2. Prior to submitting an application to CASA, the following will be conducted:
     1. Preparation of a draft copy of the amended exposition, including a summary of changes.
     2. A review of all draft documentation is conducted to confirm that all risk actions/treatments have been actioned in preparation for the change.
     3. The CEO, in consultation with the SM, will prepare and dispatch a written application to CASA for approval of the change, including details of the change and a draft copy of the amended exposition. The CEO or nominee will liaise with CASA in relation to the approval process for the amended exposition.
  3. Once approval for the change has been received from CASA, the CEO/change approver may authorise implementation of the change. A revised distribution of the exposition accompanied by an explanation of the changes must be provided to all staff members and to CASA as per the distribution process in the exposition.

Significant change involving key personnel:

* 1. A change of key personnel is always defined as a significant change.
  2. In certain circumstances, the immediate implementation of a change in key personnel will be required for the company to continue operations. Where this is required, a review of regulation 119.090 and 138.062 of CASR is required to confirm that the circumstances meet the requirements of the regulation. If confirmed that the change proposal is permitted under those regulations, the CEO/change approver holds authority to proceed with implementation of the change prior to receiving CASA approval. Any change implemented under this paragraph will be promulgated with an annotation that clearly identifies it as a significant change implemented prior to CASA approval. Provided the regulatory requirements are met, the revised / new key person may continue in the role until notification is received from CASA regarding the outcome of the application for approval of significant change.

Note: In implementing any change, all other requirements of Sample Aviation’s exposition must be complied with. This includes induction and training requirements for key personnel, which must be completed prior to the key person commencing duties of the position.

* 1. In exercising the provisions of an immediate change in key person, an application to CASA for approval must be made:
     1. For either Part 119/138 operations – within 7[[4]](#footnote-4) days of the new appointment if the new appointee is named in the exposition as a standby person previously approved by CASA.
     2. APPLICABLE ONLY to Part 138 operations - within 3[[5]](#footnote-5) days of the new appointment if the new appointee is NOT named in the exposition as the standby person.
  2. Where the change of key personnel appoints someone new to the position of CEO, the directors of the company or a person nominated by them must make the application to CASA on behalf of Sample Aviation.
  3. Except for the key person situation outlined above, a significant change requires CASA approval prior to implementation.
  4. Once approval for the change has been received from CASA, the CEO/change approver may authorise implementation of the change. A revised distribution of the exposition accompanied by an explanation of the changes must be provided to all staff members and to CASA as per the distribution process in the exposition.

Evaluation of the change / continuous improvement process:

* 1. All changes must be monitored both during implementation and upon completion of the change to ensure that any issues are not outside the scope of those identified in the evaluation of change and consideration of risk process. The monitoring process is also to ensure that any identified risk treatment plans have been actioned along with the change implementation.
  2. Where issues are identified that require correction, the Safety Manager must bring this to attention of the CEO or the applicable responsible manager.

Recording changes:

* 1. A record will be kept of the details of each change including the date that the change was implemented in the exposition. These records will be kept in accordance with the company policy on retention of documents.

1. For an operator conducting Australian air transport operations, the only reason to NOT have an SMS, as of publishing v2.4 of this AC, would be if the operator was taking advantage of the exemptions contained in Part 2 of CASA EX73/24. For an operator conducting aerial work operations, the only reason to NOT have an SMS, as of publishing v2.4 of this AC, would be if the operator was not required to have an SMS under Part 138 or the operator was taking advantage of the exemptions contained in Part 4 of CASA EX73/24. [↑](#footnote-ref-1)
2. The method of this is an operator choice and is often in a document titled “change register” [↑](#footnote-ref-2)
3. For operators with an approved SMS this would be conducted using the Risk Assessment process in the SMS. [↑](#footnote-ref-3)
4. Regulation 119.090 and 138.062 of CASR. [↑](#footnote-ref-4)
5. Regulation 138.062 of CASR. [↑](#footnote-ref-5)