



# RECREATIONAL AVIATION AUSTRALIA

## **RAAus Change Management Manual (CMM)**

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# 1 Introduction

RAAus is a CASA approved self-administering aviation organisation (ASAO) that conducts operations under CASR Part 149 and Part 103. RAAus has a safety management system (SMS) and an individual appointed to the position of Head of Safety (HOS).

For the purposes of the RAAus Change Management Manual (CMM) the following are designated CASR Part 149 Key Personnel:

- Key Person 1 – the individual holding the position of CEO (Accountable Manager).
- Key Person 2 – the individual holding the position of Head of Safety (HOS).
- Key Person 3 – the individual holding the position of Head of Flight Operations (HFO).
- Key Person 4 – the individual holding the position of Head of Airworthiness and Maintenance (HAM).

The RAAus Board is responsible for the provision of the RAAus governance framework and setting RAAus policy consistent with discharging its obligations and responsibilities in relation to the approved functions outlined in Section 3.2 of the RAAus Exposition.

Management of change is a formal process to manage change in a systematic manner in order to assess the change for potential hazards and to ensure risk mitigation strategies are accounted for before the implementation of such change. It also ensures that new risks resulting from change are managed to an acceptable level.

This manual ensures that RAAus complies with the requirements of CASR Part 149.C - Changes to exposition or personnel.

## 2 Application

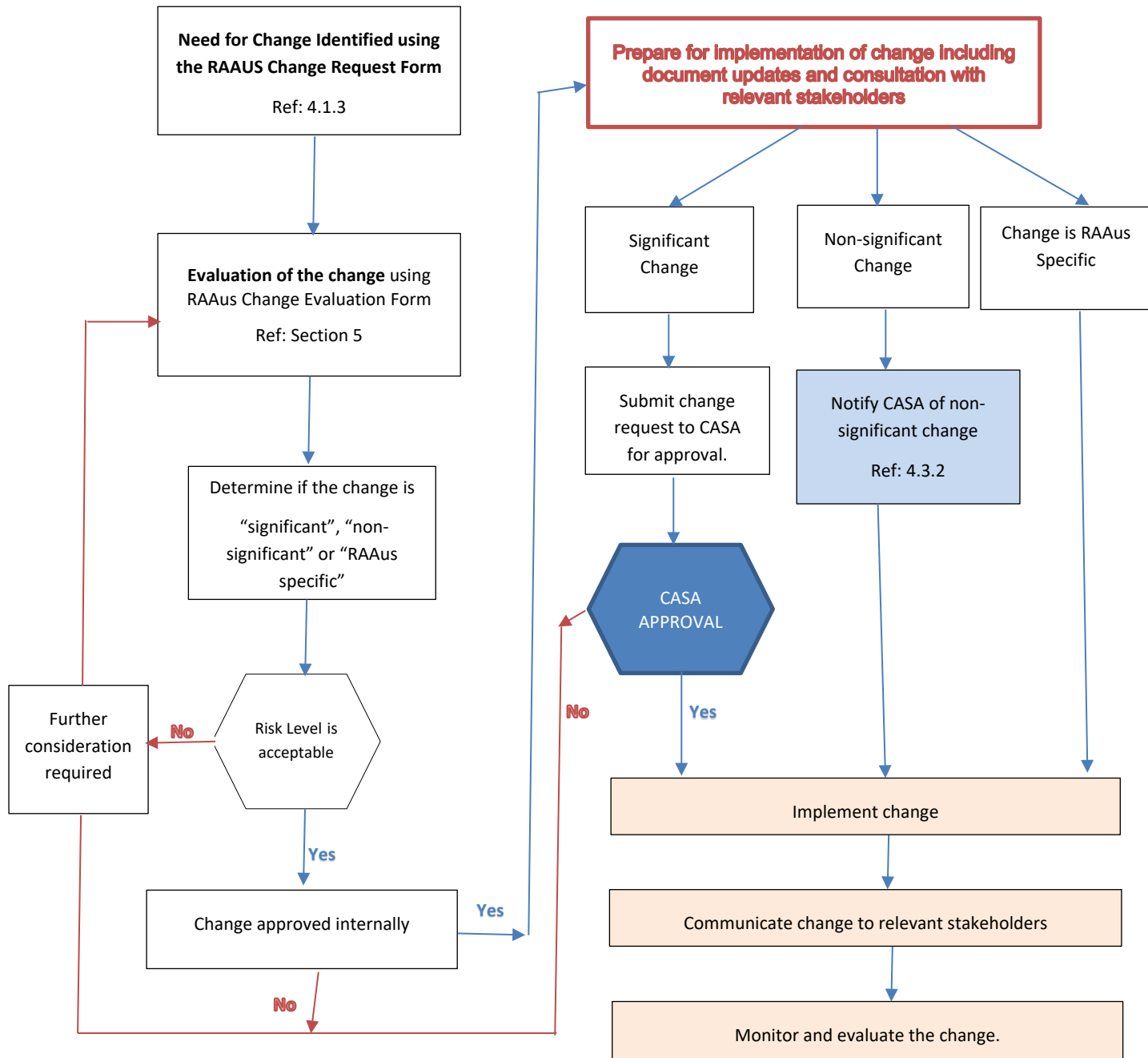
The processes contained within this manual will be applied to all changes which are deemed as significant or non-significant changes, as per the definition contained within section 4.2 of this manual.

The following documents contained within the RAAus Part 149 Exposition are subject to the significant and non-significant change requirements detailed under section 4.2.1 or 4.2.2 of this manual:

- Exposition Document
- Flight Operations Manual
- Flight Operations Department Procedures Manual
- Syllabus of Flight Training
- Technical Manual
- Airworthiness and Maintenance Administration Manual
- Key and Appointed Personnel Position Descriptions
- Audit Policy and Procedures Manual
- Document Records and Retention Management Policy
- Risk Management Manual
- Safety Manual
- Change Management Manual
- Fatigue Management Policy
- Higher Duties Allowance Policy
- Occurrence and Complaint Handling Manual
- Recruitment and Selection Policy
- Staff Disciplinary Policy

### 3 Change Management Flow Chart

Figure 1 shows the process workflow for RAAus' management of change process.



**Figure 1: Management of Change Workflow**

## 4 Administration

### 4.1 Governance

#### 4.1.1 Compliance

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

#### 4.1.2 Roles and Responsibilities

The CEO is the change approver for all RAAus change proposals resulting in a significant change. The relevant key personnel is the change approver for non-significant or RAAus specific changes. Approval from the change approver must be given prior to the implementation of any change proposal.

In the event that the change proposer is also the key personnel responsible for the department, then the change must be peer reviewed by their relevant substitute, as specified within the RAAus exposition, or by the HOS, CEO or an RAAus appointed SME.

The Head of Safety (HOS) is responsible for administrating the change process.

The responsible portfolio manager is the key person responsible for portfolio changes. Where change impacts more than one portfolio, the impacted portfolio's key personnel will be equally responsible for managing the change process.

#### 4.1.3 Need identified to change (Opportunity)

A request for change will be received using the RAAus Request for Change Form (Appendix A). The request for change form can be submitted electronically but will also be accepted in hard copy.

All changes have the potential to alter existing risks or introduce new risks (identified and unintended). RAAus' systematic approach to identifying opportunity for continuous improvement, determining, and mitigating risk, engaging stakeholders, communicating, and implementing change aims to ensure that change will be safely implemented.

Change can be initiated for many reasons including:

- new regulatory requirements;
- change in legal opinion;
- audit report findings;
- occurrence report findings;
- continuous improvement process;
- member feedback;
- editorial changes (e.g., correcting spelling, punctuation and grammatical errors);
- new business or member opportunities;
- changes in technology;
- the introduction of new or different aircraft types;
- change of key personnel

The evaluation (due diligence process) will assess the risks of the proposed change considering at least, but not limited to:

- the need for change;
- potential impact on aviation safety;
- member impact;
- potential impact on informed participants, other airspace users, aerodrome users or third-party persons and property;
- financial and resource impact;
- compliance considerations;
- complexity of the change;
- internal and external stakeholders;
- communications strategy.

#### **4.1.4 Stakeholder notification of changes**

Changes to the RAAus exposition will be provided to RAAus stakeholders consistent with the processes outlined within the distribution list in section 1.2 of the RAAus exposition. Notification must be provided with a minimum of 7 calendar days' notice of the effective date, unless, in the interest of aviation safety, a non-significant change or an approved significant change is effective immediately (or before next flight).

## **4.2 Types of Change**

#### **4.2.1 Significant change**

A significant change is defined as a change a) to any approved system or process that has the potential for an adverse impact on aviation safety, and/or b) is a change to:

- i. key personnel and appointed persons, including changes to mandatory qualifications, experience, and responsibilities;
- ii. the period that a key personnel position can be vacant or occupied simultaneously by a person who holds another key position as defined by the RAAus Exposition;
- iii. the period a key position can be vacant before being notified to CASA or filled;
- iv. the time for reporting to CASA under subregulation 149.425(2) of CASR;
- v. the approved change management processes outlined within a document listed in section 2;
- vi. the approved aviation administration rules relating to the process for applying for, the eligibility criteria for, or conditions that may be attached to, an authorisation, contained within a document listed in section 2;
- vii. any enforcement rules contained within a document listed in section 2;
- viii. the approved audit and surveillance system contained within a document listed in section 2;
- ix. the processes or procedures associated with the review of ASAO decisions as outlined within a document listed in section 2;

- x. the processes or procedures for listing aircraft and the publication of a register of aircraft, as outlined within a document listed in section 2.

NOTE: For the purposes of this manual, changes to an approved system, process or procedure does not include administrative changes that do not change the approved criteria (for example, if an IT system is updated requiring different steps to be followed for the issue of an authorisation, then this is not considered a significant change, unless there is an amendment to the assessment criteria).

#### **4.2.2 Non-significant change**

A non-significant change is any change that is not defined as a significant change in subsection 4.2.1.

Documents listed in Appendix A of the RAAus Exposition, with the exception of documents under the list of RAAus CASR Part 149 General Documents and RAAus Internal Administration Manuals, are subject to the RAAus non-significant change procedures

Note: Non-significant changes can be made to the documents listed in section 2 of this manual, so long as the changes are not significant (section 4.2.1 refers). This excludes changes associated with the issue of a new Part 149 ASAO Certificate.

#### **4.2.3 RAAus Specific Change**

An RAAus specific change is any change that is not defined as a significant or non-significant change under section 4.2.1 or 4.2.2 of this manual and is not listed as constituting content of the Part 149 Exposition (described in CASR 149.340). RAAus specific changes do not require approval by, or notification to, CASA.

#### **4.2.4 Changes to the Part 149 ASAO Certificate**

The aviation administration functions, the kinds of aircraft authorised to administer, the activities authorised to administer, and any ASAO enforcement powers are specified and authorised by a Part 149 ASAO Certificate. Any change requiring CASA to issue a new Part 149 ASAO Certificate does not fall within the scope of this manual and requires an application to be made to CASA as outlined by CASR 149.070.

### **4.3 Changes requiring approval from or notification to CASA**

#### **4.3.1 Approval of significant changes**

Significant changes will be provided to CASA by means of email to [sport@casa.gov.au](mailto:sport@casa.gov.au) using the RAAus Exposition Change Notice (ECN) form in accordance with the requirements of CASR 149.115.

The change proposal will be accompanied by a copy of the part of the RAAus exposition affected by the change (if applicable) and clearly identifying the change; and comply with the requirements (if any) prescribed by the Part 149 Manual of Standards.

CASA must, by written notice, respond to the change request within 21 days after receiving the change request in the format described by CASR 149.115 (2) and either grant the approval, refuse to grant the approval, or request further information about the application.



#### **4.3.2 Notification of non-significant changes**

Non-significant changes will be notified to CASA.

Where a change is made to the exposition, RAAus will notify stakeholders listed within the exposition distribution list, including CASA, of the intended change at least 7 days prior to the effective date unless, in the interest of aviation safety, the change is effective immediately (or before next flight).

## 5 Change Management Process

### 5.1 Initial actions

Upon submission of a request for change form, the responsible portfolio manager, CEO, and HOS will discuss the proposed change. A decision will be made on whether there is a need for the proposed change and the change will be classified as “significant”, “non-significant”, or RAAus specific according to the types of change specified in this manual.

The HOS will record the change proposal in the RAAus change register. The change register will capture sufficient detail so as to identify the source of the proposal, a synopsis of the proposed change, classification of the change (*e.g., Significant, Non-significant, RAAus specific*), date of approval, date of proposed implementation and post implementation review status. If the change is significant and requires CASA approval – the date the change request is submitted to CASA and the date the change is approved by CASA.

### 5.2 Evaluation phase

Evaluation of the change will be conducted by the responsible portfolio manager using the RAAus Change Evaluation Form.

The portfolio manager (HOS, HFO or HAM) will provide a recommendation to proceed, or not to proceed, with the change having considered:

- i. impact on stakeholders as appropriate;
- ii. number of affected stakeholders (RAAus members and other aviation participants);
- iii. complexity of the proposal;
- iv. budget and resource impact;
- v. communication requirements;
- vi. training requirements; and
- vii. documentation changes required to support the change.

If the change has the potential to introduce new hazards or change the likelihood or consequence of existing hazards in relation to aviation safety, then a risk assessment will be completed as per the RAAus Risk Management Manual, to assess the risk level and the necessary controls to manage the risk to an acceptable level.

The CEO, HOS and portfolio manager will review the information contained within the evaluation phase and a final decision will then be made as to whether to proceed with the change proposal.

The HOS is responsible for facilitating and recording outcomes and actions from the review of risks and the approval of change.

### 5.3 Significant change not involving key personnel

A significant change requires CASA approval prior to implementation as per CASR subpart 149.C.

The CEO, in consultation with key personnel, will prepare and dispatch a written application to CASA for approval of a significant change using the Exposition Change Notice form, including details of the change and a draft copy of the amended exposition.

The HOS will update the RAAus change register to reflect when the submission was made to CASA and the response received.

Upon obtaining approval for the change in writing from CASA, the CEO may authorise implementation of the change. A revised distribution of the exposition, accompanied by an explanation of the changes, must be provided to stakeholders as per the distribution process in the RAAus exposition.

## **5.4 Change Review Process**

All changes will be monitored during implementation, immediately upon completion of the change and post implementation to ensure that issues or risks outside the scope of those identified in the evaluation of change process have not materialised. The monitoring process will also ensure that any identified risk treatment plans have been actioned as part of the change implementation process.

In the event that issues are identified that require corrective action, this must be brought to the attention of the CEO, HOS and the responsible portfolio manager.

Where review of the change identifies that the classification of the change requires escalation (e.g., non-significant change becomes significant change or RAAus specific change becomes non-significant change) then notification will be made to CASA as required.

A final review will be conducted no later than 90-days following implementation of a change and the HOS will update the RAAus change register, and if appropriate, the RAAus risk register to record closure of the change.

## Appendix A – RAAus Change Request Form

Document Title: <i>(If for a manual or document to be changed, use the document title)</i>	Tracking Details (Office use only)	
	Number:	Date Received:
Name of person submitting change proposal:		
Email Address:	Phone:	Membership Number:
What should be changed? <i>(Include Section or Chapter reference if for a document)</i>		
Description and Reason for change: <i>(Please include a brief description and supporting comment as to why the change is needed, or the new initiative or the opportunity for change)</i>		
Source for supporting data or details that may assist the review:		
Benefits <i>(How will the proposed change, new initiative or opportunity benefit members or improve compliance or safety?)</i>		
<p><b>NOTE:</b> Please ensure a clear description of the issue / opportunity has been given, supporting data if available has been identified and / or attached.</p> <p>This form may be sent to the RAAUS by the following means:</p> <p>Email: <a href="mailto:members@raaus.com.au">members@raaus.com.au</a></p> <p>Mail: Recreational Aviation Australia, PO Box 1265 Fyshwick ACT 2609</p>		

## Appendix B – RAAus Change Evaluation Form

Change Title:	Change Number:
Person responsible for change:	Department:

**To be completed by the portfolio manager/owner:**

Complexity of Proposed Change ( <i>HIGH, MED, LOW</i> )
Stakeholders Impacted & Number of Stakeholders ( <i>E.g. Members – 70%, Staff - All</i> )
Impact on Stakeholders ( <i>Internal, External, Airspace Users, Third Party Property</i> )
Staff & Resourcing Requirements
Systems / Process Changes Required
Financial Impact ( <i>Resources, Implementation Costs - including Future FYs, Revenue</i> )
Timeframe for Implementation
Capability to implement the change ( <i>Resources/Skills/Experience</i> )
Communication Requirements
Training Requirements ( <i>internal and external stakeholders</i> )
Documents requiring update ( <i>Exposition, Manuals, RAAPs, Website, Policies, etc.</i> )
Compliance Considerations ( <i>e.g. CASR Part 149, WHS, Governance, Financial</i> )
How does this change align with the organisational strategy and priorities?

**Change Risk Assessment** *(Consider factors from page 1)*

<u>Strengths</u>	<u>Weaknesses</u>
<u>Opportunities</u>	<u>Threats</u>
<u>Expected Overall Change to Aviation Risk based on the proposed change (Decrease, Increase or No Change) Explain:</u>	
<u>Expected Overall Change to Organisational Risk (business continuity) based on the proposed change (Decrease, Increase or No Change) Explain:</u>	
<u>Recommendation to proceed or not to proceed with proposed change:</u>	

**Review to be completed by executive team and final approval by RAAus CEO:**

<u>Change Approved/Deferred/Rejected</u>	<u>Date</u>
<u>Explanation</u>	

**To be completed by HOS**

<u>Change Classification (Significant   Non-significant   RAAus Specific)</u>
<u>Full Risk Assessment Completed (YES/NO)</u>

## Appendix C – Exposition Change Notice Form

Name of person submitting request:	Position:
Email:	Phone:
What is the proposed change?	
What is the proposed effective date of the change?	
State of Reasons <i>(Why the change is necessary)</i>	
Benefits <i>(How will the proposed change, new initiative or opportunity benefit the organisation or improve compliance or safety?)</i>	
What changes are required to the RAAus exposition? <i>(Include Section or Chapter reference)</i>	
<b>List of supporting documentation</b> <input type="checkbox"/> RAAus Change Request Form <input type="checkbox"/> RAAus Change Evaluation Form <input type="checkbox"/> Risk Assessment <input type="checkbox"/> Draft Exposition Update <input type="checkbox"/> Other: _____ <input type="checkbox"/> Other: _____	

## Appendix D – Change Register

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