THE GLIDING FEDERATION OF AUSTRALIA INC, TRADING AS GLIDING AUSTRALIA

ABN 82 433 264 489

www.glidingaustralia.org



MANAGEMENT OF CHANGE MANUAL

DOCUMENT NUMBER ADMIN0028 Version 1, January 2024

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REVISION RECORD

Prepared	Approved	Version	Date	Revision Notes
CAP	Board	1	25/01/2024	

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1 INTRODUCTION

Gliding Australia is a CASA Approved Self-administering Aviation Organisation (ASAO) under <u>Civil Aviation</u> <u>Safety Regulations 1998</u> (CASR) Part 149. The term Gliding Australia refers to the Gliding Federation of Australia.

Gliding Australia consists of a central organisation, supporting a federation of Regional Associations and gliding clubs. Gliding is both a recreational aviation pursuit and competitive sport. Gliding Australia provides a framework for administering and managing safe gliding operations and airworthiness, specified in the Gliding Australia Exposition statement, and supporting Manuals.

The Gliding Australia Board is responsible for the provision of the Gliding Australia governance framework and setting Gliding Australia policy consistent with discharging its obligations and responsibilities in relation to the approved functions outlined in Section 1 of the Gliding Australia Exposition.

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

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 3 of this manual.

Gliding Australia will follow the change management procedure as outlined within this manual for Gliding Australia specific changes which are reasonably considered complex in nature, or those which have a significant impact on stakeholders or require significant budget, resourcing, or training for the effective implementation of the proposed change.

3 TYPES OF CHANGE

Change Proposals will be classified using the following definitions.

3.1 CASA Approval

A change that requires CASA Approval is **defined** as a change to an approved system or process impacting upon aviation safety, including changes to:

- a. Key personnel and appointed persons, including changes to mandatory qualifications, experience and responsibilities; or
- b. 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 Gliding Australia Exposition; or
- c. The period a key position can be vacant before being notified to CASA or filled; or
- d. The time for reporting to CASA under sub regulation 149.425(2) of CASR; or
- e. These management of change processes; or
- f. 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 Appendix A of the Exposition;
- g. The Gliding Australia discipline and appeals policy and procedures; or
- h. The Gliding Australia audit and surveillance system; or
- i. The Gliding Australia Exposition and manuals referenced at Appendix A that have the potential risk of <u>material</u> impact on aviation safety, other airspace users or third-party property.

Note: For the purposes of item "h" <u>material</u> impact is **defined** as - any change in the business, operations, or risks of Gliding Australia that would reasonably be expected to have an adverse effect on aviation safety, other airspace users or third-party property.

Judgements of significance and material impact must be informed or assessed using the Gliding Australia MOSP Part 5 Safety Management System and AS/NZS 31000:2018 Risk Management processes, consistent with CASA philosophy¹ and policies requiring application of risk-based judgements², to determine whether any adverse effects to the safety of aviation are presented.

Note: This entails flexible approaches³ to the risk management processes and tools used, as described in MOSP Part 5 SMS Section 5, dependent upon the severity of safety risk and the environment in which they are analysed.

¹ See CASA Regulatory Philosophy. Principle 3 states CASA takes risk-based approaches to regulatory action and decision-making: CASA will adopt a regulatory approach based on a sound assessment of the level of risk associated with particular aviation operations.

² See Statement of Expectations for the Board of the Civil Aviation Safety Authority. Section 4 Regulatory Approach states: Safety management requires a systems-based approach, including risk based and evidence driven decision making by CASA (including well documented safety cases) as well as industry. CASA's regulatory approach should be scalable to the size and complexity of each aviation activity and take into account the differing risks associated with different industry sectors and categories of operations.

³ For example, changes relating to high altitude soaring operations in controlled airspace may require 5x6 matrix analysis and a safety case with bowtie analysis. Changes related to approved maintenance processes may require 5x5 or 3x3 matrix and risk-benefit analysis. Some changes may be best supported by self-evident common-sense and TEM logic. The risk management process is not prescriptive as to the methodology for likelihood, consequence and severity analysis.

3.2 CASA Notification

A change that requires CASA notification is **defined** as any change that is not defined as a change requiring CASA Approval in subsection 3.1.1, but results in a modification to the Gliding Australia Part 149 Exposition and Appendix A documents.

3.3 Gliding Australia Specific Change

A Gliding Australia specific change is **defined** as any change that does not result in a modification to the Gliding Australia Exposition statement and supporting manuals and sections specifically invoked by the Exposition (see CASR 149.340). A Gliding Australia specific change does not require approval by, or notification to CASA.

Some Gliding Australia specific changes may be quite complex or important to the organisation. Despite the complexity or importance, if the change does not impact the Gliding Australia Part 149 Exposition, it is a Gliding Australia specific change.

4 ADMINISTRATION

4.1 Compliance

When actioning a proposed change, the management of change process in Figure 5-1 must be followed. Additional information on the methodology and process is outlined in Section 6.

4.2 Roles and Responsibilities

Gliding Australia has four Part 149 Key Persons:

- 1 Accountable Manager (AM) Chief Executive Officer (CEO), who heads the Gliding Australia Executive,
- 2 Safety Manager (SM),
- 3 Executive Manager Operations (EMO), and
- 4 Executive Manager Airworthiness (EMA).

Gliding Australia also has a governing Board and an Executive comprising various specialist department heads and representatives.

The following roles are responsible for approval of changes:

- 1 Approval of change proposal requiring CASA Approval: Chief Executive Officer (CEO).
- 2 Approval of change requiring CASA notification: The relevant key person (CEO, SM, EMO or EMA).
- 3 Approval of Gliding Australia Specific Change: The relevant key person or Executive member.

Should the change proposer⁴ also be the key person responsible for the Executive department portfolio, the change must be peer reviewed by a delegated key person; the CEO, EMO, EMA or by the SM. Approval from the change approver must be given *prior* to the implementation of any change proposal.

The SM is responsible for managing the safety management system (SMS) which defines the risk assessment framework.

The CEO may appoint a key person or Executive member as a change manager, as appropriate to the subject matter, team expertise and resources required. The appointed change manager is responsible for identifying risk and administering the change process. Where change impacts more than one department, the change manager is to consult with the other department(s) when managing the change.

The CEO and SM are accountable for the integrity of Gliding Australia's Management of Change processes, and their alignment with MOSP Part 5 SMS risk management processes.

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⁴ The change proposer may be any Gliding Australia member submitting a change proposal form. This may be accompanied by a submission or safety case for change from a key person or other Board or Executive member developing a change, improvement proposal or business case within their area of expertise and responsibility.

5 CHANGE MANAGEMENT FLOW CHART

Figure 5-1 shows the process workflow for Gliding Australia management of change process.

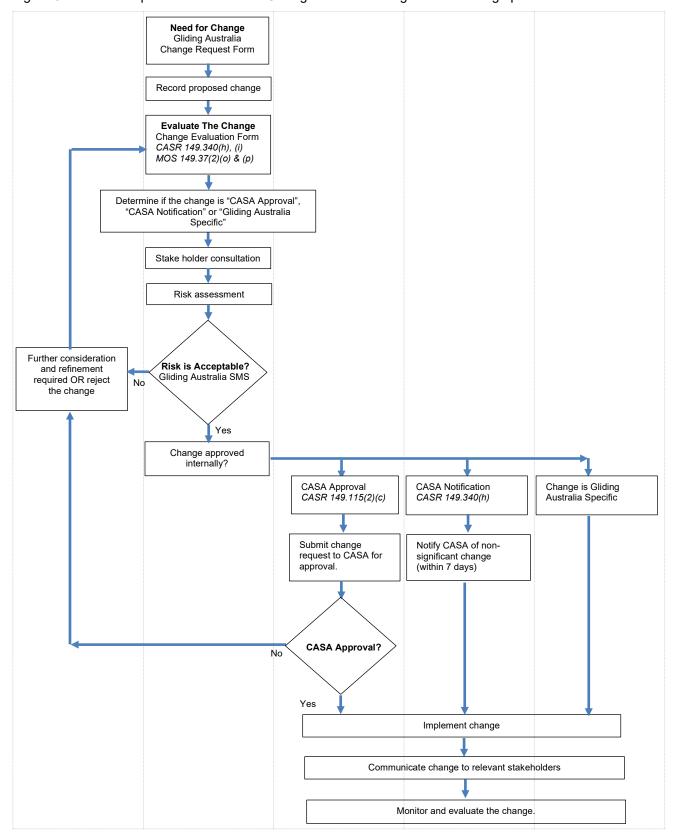


Figure 5-1 Gliding Australia Management of Change Workflow

6 CHANGE MANAGEMENT PROCEDURE

6.1 Change Proposed (Opportunity)

A request for change will be received using the Gliding Australia 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*). Gliding Australia's 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. The change management process supports the disciplined application of risk-based decision making, supporting the aviation safety related functions performed by key persons, as well as corporate efficiency, effectiveness and governance.

Change can be initiated for many reasons including:

- a. New regulatory requirements;
- b. Change in strategic direction;
- c. Change in legal opinion;
- d. Audit report findings;
- e. Occurrence report findings;
- f. Continuous improvement process;
- g. Member feedback;
- h. Editorial changes (e.g. correcting spelling, punctuation and grammatical errors);
- i. New business or member opportunities;
- j. Changes in technology;
- k. Changes in airspace and aerodrome use;
- I. Introduction of new or different aircraft types;
- m. Change of key personnel; and
- n. Legal ruling or CASA direction.

6.2 Recording Proposed Change

All change proposals are to be recorded by the Administration Officer in the Change Register (example register at Appendix D) held at the Gliding Australia Office. The change register captures sufficient detail so as to identify the source of the proposal, a brief synopsis of the proposed change, classification of the change (e.g. requiring CASA approval or notification, Gliding Australia specific), date of approval and date of proposed implementation. If the change affects the Exposition and requires CASA approval, the register records the date the change request is submitted to CASA and the date the change is approved by CASA.

Not all information will be available immediately and the Change Register will be updated by the Gliding Australia Administration Officer when they are notified of progress with the proposal.

6.3 Proposed Change Evaluation

The Change Manager will evaluate the proposal using the Evaluation Form at Appendix B. The evaluation will take into account:

- a. The impact on the applicable stakeholders;
- b. The approximate number of affected stakeholders (ASAO's members and other aviation participants);
- c. The complexity of the proposal;

- d. The budget and resource impact;
- e. The communication requirements;
- f. The training requirements; and
- g. The specific documentation changes that would be required to support the change.

Complex changes may affect more than one department. Consultation with other stakeholders is required as described at Section 6.5.

At the completion of the evaluation, the Change Manager, CEO and SM will discuss the proposed change, with specialist input from EMA and EMO. At the completion of the discussion a decision will be made on whether there is sufficient merit for the proposed change to proceed.

6.4 Determine Type of Change

Once notified by the Gliding Australia Office of a Request for Change Form, the CEO will nominate a Gliding Australia Executive member as the Change Manager. The CEO, SM and Change Manager will categorise the change proposal as either 'CASA Approval', 'CASA Notification', or 'Gliding Australia Specific' in accordance with the definitions at Section 3. The category of change will determine whether the change requires approval from CASA and the level of approval required in Gliding Australia.

6.5 Stakeholder Consultation

Many changes will impact more than one department. In these circumstances the Change Manager is to consult with each affected department to identify and assess the merits and risks of the proposed change. Records of consultations and departmental inputs should be maintained.

Stakeholder consultation should address factors including, but not limited to:

- a. The need for change,
- b. Safety benefit, impacts on aviation safety including informed participants, other airspace users and third-party persons and property,
- c. Member and club impacts,
- d. Financial and resource impacts,
- e. Organisational, systemic, process and data impacts,
- f. Governance and compliance considerations,
- g. Complexity of the change,
- h. Consequential and residual risk,
- i. Impacts on external stakeholders,
- j. Communications strategy.

Complex changes may require early engagement with CASA as a stakeholder. This should reduce nugatory effort, reduce schedule impediments to approval, and improve change effectiveness in addressing risk and compliance aspects.

6.6 Risk Assessment and Acceptance of Risk

A risk assessment will be carried out by the Change Manager in accordance with the Gliding Australia MOSP Part 5 SMS and recorded on the Change Evaluation Form.

Where the risk is assessed to be "High" or "Extreme Risk", an independent review of the change proposal is to be carried out by another Executive member. Some risks assessed as Medium may require independent review by another Executive member if of high priority and not at SFAIRP level.

The CEO, SM, relevant key person and Change Manager will review the assessed risk level and consider all treatments and mitigations (if any). Any residual risk should be as low as reasonably practical, if not further assessment and mitigation is required or the change should not proceed. At completion of the risk

assessment, the decision to proceed constitutes acceptance of the residual risk by the CEO on behalf of Gliding Australia, with the Change Manager and department head accepting responsibility for implementing the specified risk mitigation.

6.7 Internal Change Approval

A decision will be made by the Change Approver (see Section 4.2) whether to proceed or reject the change proposal. The Gliding Australia Office is to be informed of the decision by e-mail and the Change Register updated.

6.8 Approval From or Notification to CASA

6.8.1 CASA Approval of Changes

Changes requiring CASA approval will be provided to CASA by means of email to sport@casa.gov.au using the CASA Exposition Change Form (ECF) (or CASA Form 149.01) in accordance with the requirements of CASR 149.115. The change proposal will be accompanied by a copy of the part of the Gliding Australia Exposition affected by the change (if applicable) and clearly identify the change; and comply with the requirements (if any) prescribed by the Part 149 Manual of Standards.

CASA may request further information about the application to enable an assessment to be made. CASA will handle changes in accordance with Part 149 regulations. Gliding Australia must seek a written CASA notification of decision prior to change implementation.

Should an urgent change to the Gliding Australia Exposition be required, then direct CEO communication with CASA should be undertaken to seek CASA's urgent attention..

If no response is received from CASA within the prescribed timeframe, then Gliding Australia will notify CASA Director of Aviation Safety in writing of the aviation safety impacts of this non-compliance.

A complex change proposal, affecting multiple documents or processes, might not be fully agreed by CASA within the 21 day timescale. In circumstances where non-approval is considered by Gliding Australia as having adverse safety impacts, the CEO may seek urgent interim CASA approval of partial changes. Early engagement of CASA as a stakeholder is preferred, to enable early feedback and avoid schedule impediments to change.

The CEO and Gliding Australia Board may make additional representations or implement Gliding Australia specific changes, as required to protect the interests of members.

The Gliding Australia Office is to be informed of the decision by e-mail and the Change Register updated.

6.8.2 Changes of Key Personnel

A change of key personnel is, by definition, a significant change requiring CASA approval and will be actioned in accordance with the requirements of CASR Subpart 149.C. However, in certain circumstances, for example acting arrangements during illness of a key person, the immediate implementation of a change in key personnel will be required for Gliding Australia to remain compliant and continue operations. Gliding Australia may have a position vacant for a specified period under CASR 149.085(d). This specified period would allow the appointment of another person to the role (either temporary or permanent) as opposed to other regulations where an organisation may not be able to operate if a person vacates a role and no other persons have been pre-approved by CASA. Where this is required, e.g. appointment of persons pre-approved by CASA, the CEO has authority to proceed with implementation of the change prior to receiving CASA approval.

Any change request submitted to CASA under this paragraph will be made within 7 days of the new appointment and will be promulgated with an annotation that clearly identifies it as a significant urgent change requiring priority CASA attention.

Note: When implementing any change, the requirements of the Gliding Australia Exposition must be complied with. This includes recruitment, induction and training requirements for key personnel.

Where the change of key personnel results in the appointment of someone new to the position of CEO, the Gliding Australia Chair of the Board or a person nominated by the Gliding Australia Board must make the application to CASA on behalf of Gliding Australia.

6.8.3 Changes Requiring CASA Notification

Changes requiring CASA notification will be sent to CASA within at least seven (7) calendar days prior to the effective date unless there is a clear need for immediate implementation. Early engagement of CASA as a stakeholder is preferred, to enable early feedback and avoid schedule impediments to change. The CEO may directly communicate with CASA on issues requiring urgent attention, where CASA will give priority attention to emergency requests.

6.9 Change Implementation

An explanation of the change(s) must be provided to all staff, Gliding Australia members, and CASA as per the distribution process in the Gliding Australia Exposition.

When there has been a change(s) involving key personnel, a revised distribution of the exposition, accompanied by an explanation of the changes, must be provided to all staff, Gliding Australia members and CASA as per the distribution process in the exposition.

6.10 Communication of Changes

6.10.1 Communication to stakeholders

Changes to the Gliding Australia Exposition will be provided to Gliding Australia stakeholders in accordance with Section 1.16.7 of the Gliding Australia Exposition. Notification of changes must be provided with a minimum of 7 calendar days' notice of the effective date., Communication to Gliding Australia membership.

Communication of changes to Gliding Australia members is a vital part of change implementation. Members and Clubs are often comfortable with existing procedures and arrangements, so are likely to resist change implementation unless it is properly communicated.

Different groups within Gliding Australia will accept and respond to diverse methods of communication. It is important to engage all Clubs and members. The different methods are, but not limited to:

- a. Direct e-mail to members,
- b. The Gliding Australia Forum,
- c. 'Launch Points' newsletter,
- d. The Gliding Australia magazine,
- e. The Gliding Australia website,
- f. The Gliding Australia Facebook page,
- g. Webinars,
- h. Presentations at regional meetings and seminars,
- i. Bulletins for Operational, Airworthiness and Safety changes.

In order to keep the membership engaged it is important for the Change Manager to do the following:

- a. Communicate the reasons for the change openly and honestly. The communication should be kept simple, transparent, direct and straightforward.
- b. Explain how the change will affect members. This should include what benefit the change will bring to the members. This will encourage adoption of the change.
- c. Explain what the membership needs to do to implement the change. This should include the stepby-step plan for implementation and the actions the membership need to carry out.
- d. Allow members to ask questions and raise concerns. This is important in keeping the membership engaged in the change implementation by 'hearing' their concerns. Ideally this should be done at face to face regional meetings but can also be done on the Gliding Australia Forum or by e-mail.
- e. Provide ongoing updates. By providing regular ongoing updates, the membership can be kept informed of progress and remained engaged with implementing the change. Keep the

communication regular even though there may not have been any development in the implementation since the previous communication.

6.11 Monitoring the Change

All changes will be monitored by the Change Manager 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 or second order consequences are identified that require corrective action, this must be brought to the attention of the CEO, SM and the responsible key person and department officers.

Where review of the change identifies that the classification of the change requires escalation (e.g. Gliding Australia Specific change becomes CASA notifiable 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 Gliding Australia Office will be notified to update the Gliding Australia change register, and if appropriate, the Gliding Australia risk register and audit program to record closure of the change.

Regular operations and airworthiness audits will assist in monitoring the implementation of a change by the Gliding Australia membership. MOSP Parts 2 (Operations), 3 (Airworthiness) and 5 (SMS) refer.

APPENDIX A – GLIDING AUSTRALIA CHANGE/FEEDBACK PROPOSAL

This form is to be used to provide feedback, suggested changes, corrections or amendments to a Gliding Australia process, manual or published document. If the proposed change is too long or complex for this form, please attach a separate document to support the proposed change/s. Supporting documents and/or references are to be attached if available.

Document Title: (If for a manual or document to be changed, use the manual/document title)	Tracking Details (Office use only)				
changed, use the manual/document title)	Number:	Date Received:			
Name of person submitting change proposal:					
	_				
Email Address:	Phone:	Membership Number:			
What should be changed? (Include Section or Chapter reference	f for a document. Add atto	achments if required)			
	 				
Description and Reason: (<i>Provide a brief description and supportion benefit Gliding Australia</i>).	ng comment as to why the	e change is needed, and how it will			
Source for supporting data or details that may assist the review	ew:				
NOTE: Please ensure a clear description of the issue / opport	unity has been given si	Innorting data if available has			
be identified and / or attached. This form may be sent to the					
Email: returns@glidingaustralia.org					
Mail: Gliding Australia, C4/1-13 The Gateway, Bro	oadmeadows, Vic 3047				

APPENDIX B – GLIDING AUSTRALIA CHANGE EVALUATION FORM

Change Title:	Change Number:
Person responsible for change:	Department:
To be completed by the nominated Change Manager:	
Complexity of Proposed Change (HIGH, MED, LOW)	
Stakeholders Impacted (E.g. Members – 70%, Staff - All)	
Impact on Stakeholders (Internal, External, Other Airspace Users, ⁻	Third Party Property)
Staff & Other Resourcing Requirements (What is needed to implen	nent the change)
Systems / Process Changes Required	
Budget Impact (Resources, Implementation Costs - including Future	e FYs)
Timeframe for Implementation	
Gliding Australia Capability to Implement The Change (Resources/Sk	xills/Experience)

Communication Requirements	
Training Requirements (Internal and External Stakeholde	ers)
Training Requirements (memarana External Stakenolas	,
Documents To Be Updated (Exposition, Manuals, Adviso	ry Notices, Website, Policies, etc.)
Compliance Considerations (e.g. CASR Part 149, WHS, G	overnance Financial Audit)
compliance constactations (e.g. cristivate 143) witis, c	overnance, i maneral, ridale,
How does this change align with Gliding Australia's strat	egic plan and priorities?
Change Risk Assessment (Consider factors from p	age 1)
Strengths	Weaknesses
Strengths	Weakilesses
<u>Opportunities</u>	Threats

Expected Overall Change to Aviation Risk based on the	e proposed change (Decrease, Increase or No Change) E	Explain:
Expected Overall Change to Organisational Risk (busine Increase or No Change):	ess continuity) based on the proposed change (Decrea	ise,
Recommendation to proceed or not to proceed with p	proposed change:	
Review to be completed by Executive team and	I final approval by Gliding Australia CEO:	
Change Approved/Deferred/Rejected	Date	
Explanation		
To be completed by Safety Manager Change Classification (CASA Approval Notification C	Gliding Australia Specific)	
Change classification (CASA Approval) Notification C	Gliding Adstralia Specific)	
Full Risk Assessment Completed (YES/NO) Provide Det	tails:	

APPENDIX C - EXPOSITION CHANGE FORM

Name of person submitting red	μest:	Position:
Email:		Phone:
What is the proposed change?		
What is the proposed effective	date of the change?	
Statement of Reasons (Why the	change is necessary)	
	 change, new initiative or oppo	ortunity benefit the organisation or improve compliance or
safety?)		
What changes are required to	 the Gliding Australia expo:	sition? (Include Section or Chapter reference)
	5 1	
List of supporting documentati		
List of supporting documentati Gliding Australia Change I		
☐ Gliding Australia Change I☐ Gliding Australia Change I		
	Evaluation Form	
☐ Risk Assessment		
☐ Draft Exposition Update		
Other:		
Other:		

Gliding Australia Management of Change Manual

APPENDIX D - CHANGE REGISTER EXAMPLE

Change Number	Date Received	Change Proposed By	Change Owner	Description of Change	Classification of Change	Status	Date Approved / Denied	Date of Proposed Implementati on	Implementati on Status	Date Request Submitted to CASA	Date Approved by CASA	Review Status	Date of Closure
001	10/11/2021	Anthony Smith	Anthony Smith	EXAMPLE CHANGE	Gliding Australia Specific	Approved	12/11/2021	20/12/2021	In-progress	N/A	N/A	Waiting Review	-