



# **CHANGE POLICY AND PROCEDURES MANUAL**

## **AUSTRALIAN PARACHUTE FEDERATION LTD**

ACN: 101 980 358

ABN: 75 061 266 510

CASA ARN: 205322 (The APF)

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## 1. INTRODUCTION

APF is a CASA approved self-administering aviation organisation (ASAO) that conducts operations under CASR Part 149 and Part 105. APF is also a not-for-profit company limited by guarantee (CLG) that operates under the Australian Securities and Investment Commission (ASIC) requirements of the Corporations Act.

APF has responsibilities to both CASA and ASIC in respect to managing change to its constituent documents.

This policy and procedures document deals with the change management requirements of CASA by an ASAO. Of necessity this policy also deals with changes to APF's role as a CLG. It also deals with changes to **relationships** APF has with other organisations as the foremost Sport Aviation Organisation responsible for administering sport parachuting in Australia.

Reference within this Change Policy and Procedures Manual (CPPM) to the Exposition refers to all documents approved by CASA under regulation 149.080 that relate to the APF's functions under Part 149. A reference to the APF's *Exposition Reference Document* is a reference to the APF Exposition that does not include the suite of documents listed in Appendix A. APF is mindful of AC1-02 *Guide to the development of expositions and operations manuals* section 3.13 when making this reference. The APF Exposition exists partly to demonstrate that APF has both the resources and processes in place to deal with legislative requirements. It also exists to show how APF manages the safety of its operations. Legislative requirements can and do change, and thus APF must have processes in place to respond to the inevitable changes. The exposition also serves as a guide to where more detail may be found when needed.

## 2. CHANGE MANAGEMENT UNDER CASR 149

Under 149.340(i) of CASR, CASA requires an ASAO to implement a management of change process that clearly identifies changes which require CASA approval and those changes which can be made without CASA approval (notification only).

A change to the aviation administration functions of the APF as listed on the APF Part 149 Certificate will require an application to be made under 149.070 of CASR.

CASA Advisory Circular AC 149-01 Appendix C and AC 119-07 and AC 138-03 Management of Change for Aviation Organisations have collectively been used to develop this CPPM.

Changes which require express CASA approval before the change is made are designated as a “**significant change**”. Changes that may be made without seeking CASA approval are designated a “**non-significant change**”. Changes made to documents that do not form part of the APF Exposition are designated an “**APF-specific change**”.

This policy includes a **Change Management Flow Chart** to show the process steps and decision points for management of change. The decision-point on when CASA involvement is required/not required will be made after the **Change Evaluation Process** is completed. The flow chart and processes allow for the management of unintended consequences, in that there is a feedback path from “monitor and evaluate” so that the learnings from the change process are used as part of a continuous improvement exercise. APF recognises AC149-01 v1 Section C.2.2 as a reference for developing this flow chart.

Changes that require formal CASA Approval under CASR 149.120(1) will be submitted on a **CASA Change Approval Request Form** and be numbered for tracking purposes.

## 3. SIGNIFICANT CHANGE REQUIRING CASA APPROVAL

A significant change is defined as being:

- a) A change to an approved system or process that has the potential for an adverse impact on safety, or
- b) Changes to:
  - Key Personnel and Appointed Persons (Exposition 1.3.2)
  - Operational Regulations (identified in Exposition Appendix A)
  - Regulatory Schedules (identified in Exposition Appendix A)
  - Jump Pilot Manual (parts identified in Exposition Appendix A)
  - Misconduct Policy and Procedures Manual
  - Change Policy and Procedures Manual
  - Change to CASA approval status of all documents in Appendix A
  - The approved aviation administration and enforcement rules
  - The approved audit and surveillance system
  - The Exposition reference document
  - The processes or procedures associated with the review of ASAO decisions
  - The process or procedures (other than internal administrative matters) that affects or is related to, CASA’s responsibility to perform its safety regulation functions listed in Section 9(1) of the Civil Aviation Act 1988
  - The maximum period that the position of Safety Manager and other Key Personnel position in the organisation may be occupied by the same person simultaneously in an unforeseen circumstance
  - The time for reporting to CASA under subregulation 149.425(2) of CASR
  - The period each vacancy in the key personnel of the organisation must be:
    - Notified to CASA
    - Filled

#### 4. NON-SIGNIFICANT CHANGE NOT REQUIRING CASA APPROVAL

A **non-significant** change is a change to documents (or parts of documents) listed in Appendix A of the Exposition Reference Document that are identified as not requiring the approval of CASA.

Non-significant change includes grammatical corrections, adding/removing references, changes to formatting, etc, that have no significant impact on the purpose and intent of the text in the Exposition.

In accordance with 149.340(i) CASA will be notified of a non-significant change to the APF Exposition at least 7 days before the change will take effect. This will be at the same time and in the same way APF Members are notified of the change. (Exposition Distribution List refers to this).

#### 5. APF-SPECIFIC CHANGE

**APF-specific changes** are changes that do not result in a modification to the APF Exposition and will be managed in accordance with the requirements of the relevant Federal Government and or State/Territory legislation and/or with other organisations with whom APF has a relationship such as Airservices Australia, ASAC, ISC, PIA, ATSB, etc. Notification to CASA of an APF-specific change is not required.

#### 6. PROPOSAL FOR CHANGE

A proposal for change may be initiated for any number of reasons by a person or persons and includes the following:

- recommendation from annual and/or regional conference or symposium
- an Operational or Board Committee
- Special Resolution to change the APF Constitution
- following analysis of incident and accident reports
- Review Officer resulting from misconduct proceedings hearing, etc
- introducing a new training method or sport discipline
- findings and/or recommendations from a Coroner's Court, and/or
- a request from CASA.

##### 6.1 NEED OR OPPORTUNITY FOR CHANGE IDENTIFIED

Once the need or opportunity for change has been identified it will be referred, as appropriate, to the APF Board, the CEO, the STM or relevant National Manager/Officer to determine if the change has merit and if the **Change Evaluation Process** should be undertaken.

##### 6.2 CHANGE EVALUATION PROCESS

If the decision is made to undertake the **change evaluation process**, a person or committee will be appointed by the Board, CEO, the STM or a National Manager/Officer to undertake and document the process within the SMS which will, as applicable, take account of the following:

- the Change Proposer's reasons
- who will be/should be the Change Approver?
- identify stakeholders impacted by the proposed change
- consult with APF Members using on-line APF Discussion & Feedback link
- establish staffing and resource requirements
- identify systems and processes requiring change
- estimated budget to implement/manage change
- determine timeframe for implementation
- communication requirements if/when the change is made
- training requirements for participants, staff, third parties
- identify all documents requiring change
- compliance considerations CASA, WHS, Governance, Financial

- Conduct a risk assessment to determine if a change will have an adverse effect on the safety of air navigation
- How does the change align with APF Strategic Plan Goals?
- is the change considered significant, non-significant or APF-specific?
- recommendation to proceed/not to proceed.

Note that the flow chart in Section 13 contains a feedback loop to ensure that the learnings from the change progress are not lost.

## 7. CHANGE APPROVERS

The **Change Approver** will depend on the nature and scope of the change and document/s being considered for change. Designated Change Approvers are:

- APF Board (APF-specific changes)
- APF Chief Executive Officer (CEO)/Accountable Manager (significant changes/APF-specific changes)
- Technical and Safety Committee (TSC) (Non-significant changes)
- Safety and Training Manager (STM) (Referrer Non-significant changes – Safety/Training)
- National Rigging Officer (NRO) (Referrer Non-significant changes – Rigging)
- National Aviation Officer (NAO) (Referrer Non-significant changes – Aircraft Operations)

**APF-specific changes** are approved, as appropriate, by the APF Board, Members at a General Meeting, the CEO, the applicable APF Manager or National Officer, as specified in the relevant document which gives the person *authority* to approve the change for and on behalf of the APF. The following require Member and/or APF Board and/or CEO approval:

- APF Constitution (Member approval)
- Election and Voting Regulations (Board approval)
- Board Charter (Board approval)
- Board and Operational Committee Charters (Board approval)
- Area Council Charter (Board approval)
- Misconduct Policy and Procedures Manual (Board approval)
- National Office Procedures Manual (CEO approval)
- Change Policy and Procedures Manual (CEO approval)
- Member Protection Policy (CEO approval)
- Privacy Policy (CEO approval)
- Drug and Alcohol Policy (CEO approval)

## 8. CHANGE APPROVED INTERNALLY

If the CEO and/or Board Chair determines the change requires APF Board approval the recommendation for change (and substantiating data) will be placed on the agenda for the next scheduled Board meeting or dealt with by an electronic vote.

If the change is Board-approved, it is the responsibility of the CEO to implement the change or delegate responsibility to the STM or the officer/manager responsible for that function.

A change to the APF Constitution requires the approval of Members as a Special Resolution at a General Meeting and is an APF-specific change. ASIC is then notified as required by the Corporations Act. Note: If the change to the APF Constitution has a direct effect on the Part 149 Functions APF performs for CASA, it will be classified as significant if it requires a change to the APF Exposition.

A change which requires the approval of the STM and/or TSC, once approved, will be actioned by APF Technical Officers, as necessary, to draft changes to all affected documentation.

Changes that are to correct grammar, change format, add/remove references, etc, and do not change purpose or intent may be made internally with the authorisation of the CEO. The changed document is to be dated and replace that listed on the APF webpage.

APF Members will be advised of the intended change and the date the change is proposed to take effect using the APF eNews Broadcast facility and Members will be invited to provide feedback. Member feedback will be assessed and actioned, as necessary, before the change is scheduled for adoption.

## 9. DECISION IF CHANGE REQUIRES CASA APPROVAL OR NOTIFICATION

If, after undertaking a **change evaluation process**, the CEO/Accountable Manager, the STM and the Safety Manager shall collectively make a final determination as to if the change is:

- **significant**, or
- **non-significant**, or a
- **APF-specific change**

### 9.1 CASA CHANGE APPROVAL REQUEST

If the change is deemed **significant** a **CASA Change Approval Request Form** (sample appended to this policy) will be prepared and lodged with CASA and include the following:

- Name of the Change Approver and contact details
- Purpose of and overview of proposed change/(s)
- The benefits, improvement to safety (reasons)
- Changes to APF Exposition and Appendix A documents requiring express CASA approval
- List of supporting documents:
  - Risk assessment
  - Marked-up Exposition with changes
  - Key documents with marked-up changes

## 10. IMPLEMENT CHANGE/COMMUNICATE TO APF MEMBERS

APF has a policy of implementing changes to Operational Regulations and Regulatory Schedules, and others that are referenced within these, effective 1 April each year. Members will be advised through eNews Broadcast of changes with links to the document(s) on the APF website.

The definitive version of each document is that on the APF website.

Documents which are for information purposes will be changed as required and affected Members advised of changes through various forms of notification including group email, eNews Broadcast, Australian Skydiving Magazine and, the Instructors News Sheet.

## 11. MONITORING AND EVALUATION OF CHANGE

APF will use its various sources including incident and accident reports, DZ audits, CASA audits, etc, to monitor the effectiveness of change implemented and to identify any unintended consequences that emerge afterwards including: feedback from Members, APF Officers, managers, and staff.

If the monitoring and evaluation feedback loop identifies deficiencies, unintended consequences, compromises to safety, etc, these will be referred to the relevant **Change Approver** for assessment and follow up action.

If the feedback indicates the matter should be referred to someone other than the original Change Approver, for whatever reason, the CEO will decide which of the Change Approvers listed in section seven should deal with the matter.

## 12. TRACK CHANGE REGISTER

The APF Exposition *Version Control – Revision History* will be used to track changes to the APF Exposition which are incorporated from time to time through Exposition Version Control Numbering.

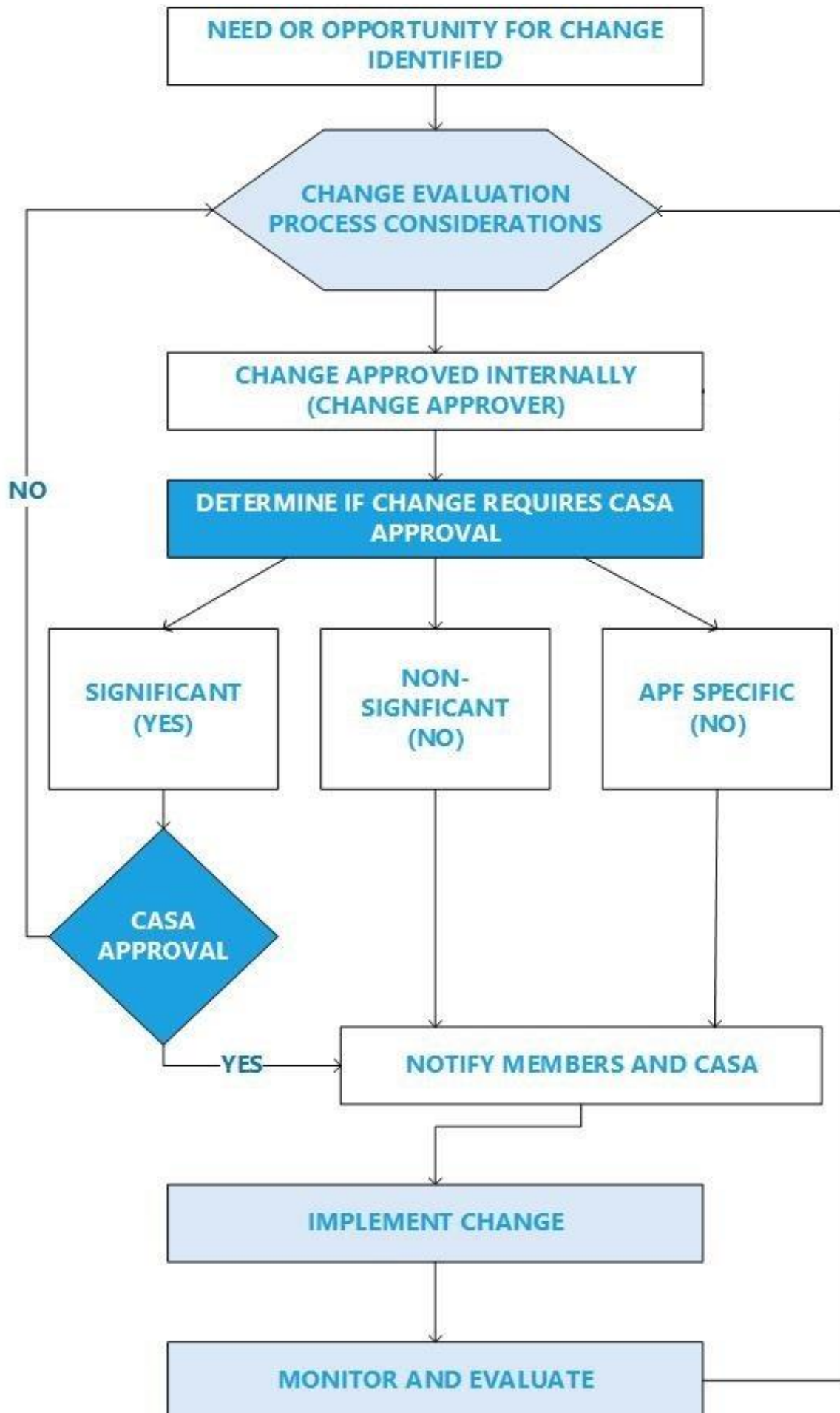
A significant, non-significant and APF-specific change will precipitate a change to the Exposition Version numbering such that:

- When a significant change receives CASA approval the Version Number will take on the next “V” number so that, for example, V2. will become V3 followed by the date it comes into effect.
- When a non-significant or APF-specific change is approved the Version Number will change so that, for example, V2.1 will become V2.2 followed by the date it comes into effect.

**Note:** For example, an Exposition version with five CASA approved changes incorporated and, subsequently has three APF internally approved changes incorporated, would become V5.3

The **Change Evaluation Process** and **Internal Approval** records will be retained on file as a record of the basis for making changes to the APF Exposition.

13. CHANGE MANAGEMENT FLOW CHART





14. CASA CHANGE APPROVAL REQUEST FORM (#: )

<b>Name of Change Approver:</b>	<b>Position:</b>
<b>Email:</b>	<b>Phone:</b>

**Purpose of proposed change/(s).** *(An explanation for what the change is, or changes are, considered necessary and why each change has been classified as significant and requires CASA approval before implementation).*

**Benefits, improvements to safety.** *(Provide a list of the benefits to parachuting safety that will flow from the change, or if the change does not provide a clear benefit to parachuting safety the change/(s) will not precipitate a reduction in safety or have a detrimental impact on other airspace users or persons and/or property on the ground).*

**Change to APF Exposition.** *(Detail, in broad terms, what changes are needed to the Exposition to accommodate the change/(s) being sought).*

**Changes to Appendix A documents.** *(If the change has a cascading effect and other documents also need changing list these even if they do not required CASA approval/notification).*

- List of supporting documents that accompany this change request:**
- Risk assessment
  - Marked up Exposition incorporating change/(s)
  - Key documents with marked-up changes.

In accordance with CASR 149.115 the APF hereby requests CASA approval to make change/(s) detailed above. After CASA approval is given, APF will proceed to implement the change and communicate with members (and CASA) as required by the APF Exposition Distribution List.

Signed by: \_\_\_\_\_ Date: \_\_\_\_\_