

Checklist for approving a change management procedure

NOTES:

CHANGE MANAGEMENT PROCEDURE UNIQUE IDENTIFICATION REQUIREMENT

As the Change Management Procedure must be approved by the CAA, it must be a separate and uniquely identified document and not included within any other document such as the Safety Management System or Management System.

The unique identification must include the Document Number, Issue, date, amendment state etc in accordance with your Management System document control process.

Larger more complex organisations may require more than one procedure to manage change. In such situations, to prevent multiple approvals being issued, the procedures are to be grouped under a master change management procedure/index with sub procedures clearly identified such that any modification to a sub-procedure will constitute a modification to the master approved document.

SCOPE OF THE CHANGE MANAGEMENT PROCEDURES

Where the service provider is also a certified training organisation the management system should encompass the requirements of both 2017/373 and 2015/340. Although not specifically stated in regulation 2015/340, the CAA requires that the single change management procedure should also encompass the change requirements of both regulations.

CHANGE MANAGEMENT PROCEDURES

- Regulation 2017/373, ATM/ANS.OR.B.010 requires service providers to have an approved change management procedure to manage changes to its functional system.
- Regulation 2017/373, ATM/ANS.OR.A.040 (b) requires service providers to have an approved procedure to manage changes that do not affect the functional system.
- Regulation 2015/340, ATCO.OR.B.015 (e) requires training organisations to have an approved procedure to manage changes that do not require prior approval.

MODIFICATIONS TO THE CHANGE MANAGEMENT PROCEDURES

ATM/ANS.OR.B.(b)

There is no requirement for the change management procedure to define the process for modifying the change management procedure and for submitting details of the modification to the CAA for approval. This process should be documented within the management system or safety management system document control process and appropriate records maintained.

IDENTIFICATION OF CHANGES TO FUNCTIONAL SYSTEMS

GM1 ATM/ANS.OR.B.010(a) (b) and GM1 ATM/ANS.OR.B.005(a)(4)

There is no requirement for the change management procedure to detail a process for identifying the circumstances that will trigger a change. This process should be documented within the management system or safety management system as applicable.

MONITORING A CHANGE

GM1 ATM/ANS.OR.B.010(a) (a) (5)

There is no requirement for the change management procedure to establish the criteria for monitoring a change once it is implemented. Such criteria and monitoring process should form part of the service provider's management system.

LIFECYCLE OF A CHANGE

AMC1 ATM/ANS.OR.B.010(a) (a)

The change management procedures should cover the complete lifecycle of a change i.e. From identification of the need for a change to completion of transition into service.

CHECKLIST

DOES THE CHANGE MANAGEMENT PROCEDURE MEET THE FOLLOWING REQUIREMENTS		
Requirement	Reference	Y/N
A change identification process i.e. once a change has been proposed the change identification process should determine if the proposed change is viable, realistic and practical to implement and what are the potential benefits before deciding to initiate the change management process.	AMC1 ATM/ANS.OR.B.010(a) (f)	
A process for assessing if the change management procedure content is suitable for the proposed change or will it be necessary to deviate from the approved procedures to implement the change and a process for requesting an exemption from the CAA to deviate from the approved procedures.	ATM/ANS.OR.B.010 (c)	
For changes that affect the functional system a process to determine the scope of the change i.e. which parts of the functional system will be impacted on by the change.	ATM/ANS.OR.B.010(a) GM1 ATM/ANS.OR.B.010(a) (a) (2)	
A process for determining if a safety assessment or safety support assessment will be required to manage the change.	ATM/ANS.OR.B.010(a) GM1 ATM/ANS.OR.B.010(a) (c) (1) (iii)	
The roles and activities for managing the change and for developing the safety assessment or safety support assessment as applicable.	ATM/ANS.OR.B.010(a) AMC1 ATM/ANS.OR.B.010(a) (c)	
A process for determining if there is sufficient competence available to develop the safety assessment or safety support assessment i.e. will a contracted organisation be required to develop the safety assessment/safety support assessment.	ATM/ANS.OR.B.010(a) GM1 ATM/ANS.OR.B.010 (a) (c) (1) (i)	
The format and content of safety assessments (ATS.OR.205), safety criteria (ATS.OR.210) or safety support assessments (ATM/ANS.OR.C.005) and any other mitigation methods used.	ATM/ANS.OR.B.010(a) AMC1 ATM/ANS.OR.B.010(a) (b)	
Where the change involves one or more service providers a process for consultation and for the development of an overarching safety argument	AMC1 ATM/ANS.OR.B.010(a) (b) ATM./ANS.OR.A.045 (a) (3)	
A means of identifying if other organisations or service users will be affected by the change and a process for communicating details of the change to those affected	ATM/ANS.OR.B.010(a) GM1 ATM/ANS.OR.B.010(a) (c) (1) (vii) (viii)	

A process for notifying the CAA of changes that affect the functional system.	ATM/ANS.OR.B.010 (b) (1) AMC1 ATM/ANS.OR.B.010 (a) (d) and (e)	
A process for notifying the CAA of changes that do not affect the functional system or require prior approval.	ATM/ANS.OR.A.040 (b) AMC2 ATM/ANS.OR.A.040(b)	
A process for ensuring that once the change is notified to the CAA any modifications to the change proposal are also notified to the CAA and to any other service providers affected by the change.	ATM/ANS.OR.A.045 (b)	
When a notified change is selected for review by the CAA the change management procedure should ensure that the change or any parts of the change cannot be implemented until approval is received from the CAA.	ATM/ANS.OR.A.045 (c)	
The change management procedure should refer or link to a Change Register as required by AMC2 ATM/ANS.OR.B.010(a).	AMC2 ATM/ANS.OR.B.010(a)	
THE FOLLOWING REQUIREMENTS ARE FROM REGULATION 2015/340 AND ARE THEREFORE ONLY APPLICABLE TO AIR TRAFFIC CONTROL PROVIDERS		
A process for identifying if a training organisation change requires prior approval before implementation.	ATCO.OR.B.015 (a) (b)	
A process for notifying the CAA of training organisation changes that require prior approval.	ATCO.OR.B.015 (c)	
COMMENTS		