



Civil Aviation Authority
SAFETY NOTICE
Number: SN-2020/015



Issued: 20 August 2020

**Effective Change Management for
Organisations During Covid-19**

This Safety Notice contains recommendations regarding operational safety.

Recipients must ensure that this Notice is copied to all members of their staff who need to take appropriate action or who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability:	
Aerodromes:	All Aerodrome Operators
Air Traffic:	All ATS
Airspace:	Not primarily affected
Airworthiness:	All Airworthiness Organisations
Flight Operations:	All AOC/NCC/SPO Operators (Management System)
Licensed/Unlicensed Personnel:	For awareness

1 Introduction

- 1.1 The Covid-19 pandemic has brought about significant change to the aviation industry. The importance of effective change management is now more vital than ever to ensure that new and existing risks are managed.
- 1.2 Aviation is a complex system of systems, with multiple different organisations operating in complementary roles in the same operational environment. The challenges that the multiple different organisations and service providers have will be unique to them but may have significant impact on others during this period of rapid change and re-prioritisation. Organisations need to consider not only the changes affecting them but those affecting others in order to develop robust change management approaches.
- 1.3 The purpose of this Safety Notice (SN) is to promote the importance of utilising a Safety Management System (SMS) to manage change. It makes recommendations on approaches to take, particularly as the return to normal operations has commenced.
- 1.4 This SN does not replace existing regulatory requirements associated with your approval or introduce new mandatory requirements. Existing organisational procedures should still be complied with.
- 1.5 Although SMS is not yet mandated across all airworthiness organisations, they are invited to consider the recommendations in this SN.

2 Recommendations / Considerations

2.1 Examples of changes relevant to the Covid-19 pandemic that may require a formal management of change review include:

- Ramping up of operations following a period of reduced operations
- Furloughing of staff / reduction in staff numbers / personnel changes
- Restructuring of management teams, including nominated persons/postholders
- Change to contracted / sub contracted activities (impacting supply chain fragility)
- The impact of layering of exemptions / alleviations
- The lifting of exemptions / alleviations
- Significant reductions in budget and revenue
- Continued operation under prolonged periods of uncertainty

2.2 The following are recommended considerations:

Start the management of change process as early as possible. The change management process is important to identify new hazards and their associated risks. With the current situation, financial or business needs may lead to decisions being made at speed, before the change management process has been followed. If this is the case, a risk assessment should still be performed prior to the change being implemented. This will allow any required mitigations to be identified, which should be implemented prior to the change.

The management of change should utilise your existing safety risk management process for the assessment of hazards and their consequences during risk assessment.

Re-assess existing risks and challenge previous assumptions about mitigations. As well as new risks being introduced by the significant changes the aviation industry is going through, existing risks should be revisited. Assumptions on the performance of existing risk mitigations may no longer be valid.

Assurance of the change / safety performance monitoring – existing Safety Performance Indicators (SPIs) may no longer be sound, with previous targets or goals no longer suitable. This is particularly true as reporting will have abruptly reduced following the reduction in flying and then ramped up as operations restart. New targets and/or goals will need to be established. In addition, new SPIs in their entirety may be necessary to monitor the impact of changes.

Safety Objectives – high level, medium term safety objectives may no longer be realistic or achievable given the Covid-19 pandemic. These objectives may require review and amendment, either in terms of their content or time scales. Revisions to SPIs should consider any changes to safety objectives.

Collection of new data – consider asking colleagues to report new events or incidents that had not been collected previously, particularly if these relate to a new risk mitigation for a change. The use of safety surveys and safety observations don't rely on reporting and can supplement compliance monitoring and SPIs to ensure risk mitigations are robust. The validity of existing data (including the loss of data) should not necessarily be taken for granted.

Compliance monitoring - the use of compliance monitoring is key, not only to ensure compliance with the applicable regulations, but also to verify the effectiveness of risk mitigations that rely on compliance with processes, procedures or rules. An audit programme may need revision to focus on key risk mitigations.

Use of resources – job changes or the furloughing of staff may mean that resources or assets are being used in different ways to their original intention, assess their redeployment.

Reporting in different ways – there may be barriers to reporting that previously didn't exist – consider new ways to receive reports such as via telecons, verbally or an instant messaging function such as whats app, but ensure these remain factual. The reporting of certain events may not be practical on an ongoing basis. Continue asking colleagues to report for a limited time period, such as a shift or one week, to at least gain a sample of a particular event frequency.

Safety Committee meetings - these meetings are a key forum to discuss changes to the external operating environment and challenge assumptions. Consideration should be given to the compounding effects of multiple changes happening at the same time. The meeting frequency may need to be varied and extraordinary meetings may be convened to focus on specific changes and risks.

Training – training budgets will likely be stretched and scaled back given financial challenges. However, colleagues must continue to remain competent to fulfil their responsibilities. Consider how continued staff competency (e.g. knowledge, experience, attitudes and behaviours) can be achieved.

Safety Promotion – safety communications should be carefully planned as colleagues are likely to be overloaded with information. Consider the best means to convey key messages, such as briefings and video messaging.

3 Framework for the Management of Change

3.1 In assessing the change, the following steps are one approach that can be taken. A link to the CAA's detailed Management of Change Evaluation Tool guidance (from which these are extracted) can be found in Section 5.

I. Assessment of the nature, scope and impact of the proposed change

Review the submitted documentation to understand the change, has been adequately described, including the context and its impact internally and externally.

II. Assessing hazard and consequence identification

Ensure that an appropriate hazard identification process has been carried out and the range of consequences have been identified and documented.

III. Evaluation of the way that the risk has been assessed and accepted

Review and evaluate the probability and severity classifications are appropriate and justified and are applied consistently to manage risks to an acceptable level.

IV. Assessing the risk mitigation actions

Evaluate the risk mitigations to determine the effectiveness of the actions taken to control the risk.

V. Assessing the justification and, supporting evidence

Assessment of any supporting evidence and arguments used to justify that the change is valid and does not have an adverse effect on safety

VI. Assessing the assurance plan to manage the residual risk

Review how the organisation plans to monitor the change implementation and verify that risks' mitigations are effectively managed after the change has been completed

4 Examples of Key Questions to Ask to Support Change Management Within the Organisation's Context

- 4.1 The foundation for change management will be a clear understanding of the nature, scope and impact of the change (step one in the change management process). This sets the scene for being able to understand, assess and mitigate risks associated with the change.
- 4.2 Below are some high level questions that organisations should consider asking themselves to support the introduction of change, especially on the impact of the people they asking to deliver the changed approach within the day to day operational environment.

People

- How does it change the task itself?
- Do the new tasks/roles require new knowledge or skill?
- Does the change alter the tasks of a user or affect the tasks of others?
- Does the change alter roles and responsibilities for the users or affect others?
- How does the change impact the consumer (passenger)?

Equipment (Hardware)

- Does the change imply the use of new equipment?
- Does the change impact of the ability to use current equipment?

Processes / Technology (Software)

- Does the change imply processing of new information?
- Does the change involve new, changed or additional procedures?
- Does the change impact the supply chain?

Environment

- Does the internal change alter the user's work environment?
- Is the environment itself altered by external changes that may impact on the task? (Wearing PPE / Airport layout changes / Passenger expectations / etc)

5 Further Information

- 5.1 Additional information and guidance material for SMS and change management can be found in the links below:
- 5.2 [CAA SMS Webpage](#)
- 5.3 [CAA Management of Change Evaluation Tool](#)
- 5.4 [Safety Notice 2020/011 - Human Factors Considerations During Covid-19 Restart Activities](#)
- 5.5 [Safety Notice 2020/14 – Aviation Mental Health](#)
- 5.6 [Safety Management International Collaboration Group Guidance](#)

5.7 [CAP 795 - Safety Management Systems - Guidance to Organisations](#)

6 Queries

6.1 Any queries or requests for further guidance as a result of this communication should be addressed to sms@caa.co.uk.

7 Cancellation

7.1 This Safety Notice will remain in force until further notice.

Appendix 1

Management of Change Framework during Covid-19



i) Nature, Scope and Intent

Consider the people, process, equipment and environment

Consider the changes in the external environment .



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ii) Hazard & Consequence identification

Review hazards in line with new environment

Understand effectiveness of safety barriers

Safety barriers need to be organisational and built in rather than relying on people to perform perfectly on the day.



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iii) Risk Evaluation Process

Involve safety committee

Assumptions need to be clearly identified

Use multiple approaches and consider system safety issues such as HF and culture.



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iv) Risk Mitigation

Selection of mitigations may be different from pre-Covid 19

Build tolerance into mitigation selection to cope with potential short notice or rapid changes in other parts of the system.



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v) Justification and Evidence

Select SPIs based on new operational environment and available data sources

Use internal and external sources of evidence

Evidence contingency planning to cope with disruptions



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vi) Assurance Activities

Identify proactive as well as reactive methods to carry out assurance

Review SPIs and make necessary changes

Check assumptions

Check external factors for changes



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