

Attachment 1:

**CASA Review of CASR Part 172 Approval of Airservices Australia –
Action Response – 14 December 2012**

CASA Review of CASR Part 172 Approval of Airservices Australia – Action Response – 14 December 2012

Recommendation		Existing Review and Improvement Program		Action		Evidence		Completion Date		Lead Action		
1	Airservices should conduct an annual review of all ATS-attributable BOS, LOSA and other significant incidents to identify the root causes and any trends, whilst ensuring robust and effective systemic corrective actions are put in place.			Airservices will conduct a review and develop a report to provide to CASA on a bi-annual basis.	Report	Complete 30 Nov 12			Analysis: S&A		Propose actions: ATC & S&A	
				Report addressing data July to December will be prepared and provided to CASA by the end of February 2013.								31 Jan 13
				Each subsequent bi-annual report will be prepared and provided to CASA within one month of end of period.								31 Jan and 31 July each year
2	Airservices should provide a detailed report of the annual review of all ATS-attributable BOS, LOSA and other significant incidents to CASA including the safety outcomes of the review with action plan details to address any safety identified issues.			See (1) above.					Analysis: S&A		Propose actions: ATC & S&A	
3	Airservices should change its focus from concern over the number of NCNs issued at audit, to identifying their root cause.			Airservices is conducting systemic analysis of Part 172 NCNs to assess the: <ul style="list-style-type: none"> - level and nature of recurrence of NCNs and - robustness/effectiveness of root cause analysis and agreed actions Opportunities for improvements will be identified and actions developed and advised to CASA.	Advice to CASA on outcome of analysis and proposed actions	28 Feb 13			S&A and ATC			

Recommendation	Existing Review and Improvement Program	Action	Evidence	Completion Date	Lead Action
<p>4</p> <p>Airservices should identify and implement strategies to identify the root cause(s) of NCNs issued, specifically including:</p> <ul style="list-style-type: none"> - Improving Document Control processes, including fixing Contingency Plan issues; - Improving the SMS; - Identifying strategies for achieving greater compliance with the Operations Manual by ATS staff; and - Improving the Training and Checking processes. 		<p>See (3) above. The systemic review will specifically look at these areas.</p>			S&A and ATC
<p>5</p> <p>Airservices should conduct a detailed review of ATS staff numbers to ensure that sufficient suitability qualified and trained personnel are available to provide and supervise at all times the appropriate levels of ATS.</p>	<p>In 2009 Ernst and Young (EY) undertook a work standards review for ATCs. This review established the Independent Requirement Review (IRR), which determines the staffing requirements for the ATC Group based on air traffic operational requirements.</p> <p>The IRR, using the process defined by EY, is undertaken annually and includes the review of the hours of coverage, core training requirements and other operational factors. This methodology has previously been provided to CASA.</p>	<p>An external review will be conducted by NavCanada.</p>	<p>Terms of Reference</p>	<p>21 Dec 12</p>	<p>ATC</p> <p>28 Feb 13 (subject to availability of contractor)</p>

Recommendation		Existing Review and Improvement Program			Action	Evidence	Completion Date	Lead Action
6	Airservices should review the validity of the Service Delivery Environment concepts, its impact on the availability of ATS resources, and the status of the rollout including revised timelines.			See (5).				ATC
7	Airservices should fast-track improvements to the ATS re-sectorisation of airspace in the Brisbane Basin, Western Australia and South Australia, including a review of air routes, holding patterns, workstations and staffing.			Airservices is reviewing implementation timeframes and updated advice will be provided to CASA.	Letter to CASA	21 Dec 12		ATC
8	Airservices should improve the demand/capacity system for enroute Sectors by examining the application of ATM tools and processes for traffic management used in foreign state jurisdictions.			<p>Airservices implemented Metron Air Traffic Management Tool (Metron) into Perth and Sydney in March 2012. The Post Implementation Review has provided evidence that enroute feeder air traffic control sectors into Sydney (Hunter/Macquarie/Canberra group) have seen reduced significantly traffic complexity and workload. Metron will be implemented in Brisbane on 19 Dec 12 and Melbourne is currently scheduled for June 2013.</p> <p>Airservices is driving the Airport Capacity and Enhancement Program to increase capacity and therefore reduce holding into airports. Each airport has a specific agreed action plan developed with Industry and airport owner.</p> <p>The delivery of ATM Workload tools within Eurocat are identified in the Eurocat 5 year works plan and currently programmed for 2014-15.</p>	<p>Nil additional actions.</p> <p>Metron: Brisbane 19 Dec 12 Melbourne June 13</p>			ATC

Recommendation	Existing Review and Improvement Program	Action	Evidence	Completion Date	Lead Action
<p>9</p> <p>Airservices should conduct a holistic review of Manual of Air Traffic Services (MATS) in conjunction with the Department of Defence in order to update the suite of ATS procedures and standards to obtain increased efficiency and international harmonisation.</p>	<p>Airservices is working with Defence to simplify Chapter 10 of MATS (Separation) and better align with ICAO where possible. These improvements will be effective on 30 May 2013.</p> <p>Our ability to simplify separation standards is currently limited by the mixed avionics fitment across the current aircraft fleet. A further review will be conducted of separation standards leading up to the introduction of the NFRM 1105AS CNS/ATM mandate and ATC Future Systems in February 2017.</p>	<p>Nil additional actions.</p>	<p>MATS Chapter 10</p>	<p>30 May 2013</p>	<p>S&A and ATC</p>

Recommendation	Existing Review and Improvement Program	Action	Evidence	Completion Date	Lead Action
<p>10</p> <p>Airservices should regularly review and test Contingency Plans at a local and national level to ensure that they are fit for purpose in an operational environment.</p>	<p>Requirements for review and test of contingency plans (CPs) are set out in the National ATS Contingency Plan (ATS-CP-0001).</p> <p>Managers are required to ensure that CPs are tested annually by a desktop exercise or simulated contingency scenario, unless it has been activated within the past 12 months.</p> <p>PARs are conducted for all CP activations to ensure that lessons learnt are captured and lead to process improvements.</p> <p>CPs are required to be reviewed:</p> <ul style="list-style-type: none"> - whenever normal operating procedures are changed to the extent that the procedures contained in the CP may be affected - as soon as possible after the commissioning of new communications facilities, air traffic services or air routes which might affect, or be affected by, the CP procedures. <p>In addition:</p> <ul style="list-style-type: none"> - Three monthly - Review contact lists for accuracy and currency. - Six monthly - Review the plan for accuracy and relevance in light of organisational changes and changes to the operational environment. - Annually - Review the plan for standardisation and for consistency with the national plan and sub-plan templates. <p>There are 13 improvement initiatives underway in relation to contingency planning as a result of the March TIBA incident in the TOPS group. These have separately been reported to CASA.</p>	<p>Provide CASA with an annual plan for testing</p>	<p>2013 Plan</p>	<p>21 Dec 12</p>	<p>ATC</p>

Recommendation		Existing Review and Improvement Program		Action	Evidence	Completion Date	Lead Action
11	Airservices should review the way TIBA is currently managed as the Contingency Plan documentation, procedures and requirements are complex and have failed, at times, to adequately provide an acceptable level of safety to the travelling public.		In addition to airspace release arrangements already implemented, Airservices is developing a contingency endorsement to improve the way we manage short notice staff unavailability and avoid use of TIBA. Contingency plan documents, procedures and requirements being addressed under (10) above.	Advice to CASA with supporting evidence once endorsement is developed	28 Feb 13	ATC	
12	Airservices should develop a staffing strategy that will ensure that ATS are provided without the need to employ the contingency measure of TIBA for non-catastrophic events such as staff illness or injury.		See (11) above.			ATC	
13	Airservices should conduct a complete review of its SMS, including its effectiveness to achieve its stated safety objectives relative to the provision of ATS.	<p>External reviews of Airservices SMS in recent years include:</p> <ul style="list-style-type: none"> UKNATS reviewed the entire SMS approach in 2008 and made two recommendations for improvements, which were addressed. ICAO USOAP audit in 2008 which found that we have "a mature and comprehensive SMS" CASA audit in 2010 which found that we had a "sophisticated and mature SMS that is constantly seeking internal and external critical assessment" CANSO SMS maturity benchmarking oversighted and validated by Eurocontrol in 2012 placed Airservices SMS in the top 10% of participants 	External review to be completed.	Terms of Reference	21 Dec 12	S&A	
				Report	31 Mar 13 (subject to availability of contractor)		

Recommendation	Existing Review and Improvement Program	Action	Evidence	Completion Date	Lead Action
14	<p>Airservices should review the effectiveness of its internal audit process in relation CASA and ICAO requirements regarding ATS.</p>	<p>An ICAO and Part 172 aligned compliance test plan is used for all ATC operational audits. It is reviewed annually and was most recently updated in November 2012.</p> <p>A new regulatory compliance audit report format was introduced in November 2012 to more clearly demonstrate audit scope and coverage.</p> <p>An external quality assessment of our internal audit methodology against professional auditing standards is conducted every five years, as required by the professional auditing standards. The last review (in July 2011) identified two minor non-conformances issues which have since been addressed.</p>	<p>Provide detailed evidence to CASA of internal audit process and its alignment with Part 172 and ICAO 4444 for ATC operational audits, including supporting documentation.</p> <p>Provide evidence to CASA of sufficient access to SME's for Part 172 audits from 2010-11 to present.</p> <p>Document the Part 172 audit strategy to improve the robustness of the audit plan.</p> <p>Prepare an assurance map for our Part 172 compliance.</p> <p>Commission an external review of the audit process for Part 172.</p>	<p>Step through detailed evidence of audit process with CASA</p> <p>List of SMEs</p> <p>Copy of Part 172 audit strategy</p> <p>Copy of assurance map</p> <p>Copy of review</p>	<p>8 Feb 13</p> <p>8 Feb 13</p> <p>31 Mar 13</p> <p>31 Mar 13</p> <p>30 Jun 13</p> <p>S&A</p>
15	<p>Airservices should strengthen its audit surveillance program.</p>	<p>See (14) above.</p>			<p>S&A</p>

16	<p>Airservices should have more suitably trained ATS incident investigators available to conduct more investigations of ATS-attributable incidents in order to identify root causes.</p>	<p>In October 2012 Airservices completed a Post Implementation Review of its investigation process, identifying 23 actions for improvement that are being implemented. Actions include:</p> <ul style="list-style-type: none"> - Update investigation process timings - Improve the capture of investigation (causal) factors - Improve the investigation report template and develop a template to capture the managerial review outcomes - Clarify the assurance functions and responsibilities in 'Findings to Action' workflow - Formalise process for publication of investigation reports <p>Two additional investigator positions were approved in December and will be filled as soon as possible.</p>	<p>The effectiveness of the investigation process will be included in the external SMS review at item (13).</p> <p>Airservices will conduct a Lean Six Sigma review of investigation process, to inform a decision on process improvements and investigation resourcing.</p>	<p>SMS review report</p> <p>Lean Six Sigma review report</p>	<p>31 Mar 13</p> <p>31 Mar 13</p>	<p>S&A</p> <p>S&A</p>
17	<p>Airservices should improve its timeframe for the finalisation of incident investigation reports so as to identify and address deficiencies in practices and procedures.</p>	<p>See (16) above</p>	<p>See (16) above</p>			<p>S&A</p>
18	<p>Airservices should improve its responsiveness to CASA's request for investigation results to provide evidence that root causes have been identified and addressed.</p>	<p>See (16) above</p>	<p>See (16) above</p>			<p>S&A</p>

19	<p>Airservices should assure the investigators' independence when forming recommendations for agreed corrective action' with the business group manager.</p>	<p>Investigators are independent from the business group they investigate and S&A managers approve all actions proposed by the business group.</p> <p>In addition, the revised investigation procedure clarifies an assurance process to ensure that the agreed action appropriately addresses the identified finding.</p>	<p>As an additional measure, a rotation program is now in place with an investigator being assigned investigations at other ATC facilities other than normal place of employment. Rotation will be based on a minimum of 4 investigations at other locations per annum.</p>	Internal Memo	Completed 3 Dec 12	S&A and ATC
20	<p>Airservices should review its ATS incident investigation process in order to better identify systemic issues.</p>	<p>See (16) above.</p>				S&A
21	<p>Airservices should review its ATS Risk Management processes so that operational staff have better visibility of hazards and current risk levels, and are more involved in risk ownership and mitigation.</p>	<p>The Operational Risk Assessment (ORA) standard (AA-NOS-SAF-006) was recently updated, effective 13 Nov 2012. It makes clear that:</p> <ul style="list-style-type: none"> - Operational unit managers are responsible for risk assessments for their unit - Managers must monitor and maintain ORA as part of normal business operations to ensure that hazards and controls are effectively managed. - The ORA must be formally reviewed each year, with appropriate representation from staff members and subject matter experts. <p>A current review of the 60 ATC unit ORAs, to establish a current risk baseline and will be completed by 21 December 2012. This will improve visibility of operational risks at Unit level.</p>	<p>All ATC line managers have been reminded of their accountabilities for risk management.</p>	<p>Completion of tactical ORAs</p>	<p>21 Dec 12</p> <p>Complete 3 Dec 12</p>	S&A and ATC

22	<p>Airservices should ensure that suitability qualified ATS staff are provided for safety activities, such as Hazard Identification workshops, incident investigations, testing of new equipment and other safety related, efficiency and support activities.</p>	<p>This requirement exists for:</p> <ul style="list-style-type: none"> - Safety Case Assessment and Reporting Determinations (SCARD) Step 2 (see AA-TEMP-SAF-0042). An updated SCARD template released on 27 Nov 2012 more clearly emphasises participant requirements. - Hazard Identification (AA-PROC-SAF-0105) - Investigations (AA-NOS-SAF-0002) - New equipment testing (C-MAN0107) 	<p>Airservices will conduct an audit to examine a sample of safety activities over the last six months to ensure that sufficient ATS staff participated in safety related activities where ATC expertise was required.</p>	28 Apr 13	S&A and ATC
23	<p>Airservices should notify CASA of all 'significant' changes to the National Airspace Systems (NAS) that may affect the provision of ATS. CASA will determine which changes will require further safety evidence.</p>	<p>The combining of the SCARD templates made no change to the levels of change notification that were reflected in the separate Part 171 and 172 SCARDS.</p> <p>The current SCARD template ensures that</p> <ul style="list-style-type: none"> - a Safety Case is prepared whenever regulatory approval is required for a change to the provider certificate schedules. - Safety Assessment Reports that meet the CASA notification requirements (as defined in Part 171 Operations Manual) are sent to CASA prior to the change. This includes changes like decommissioning of a system or a reduction in service noticeable to industry. <p>It is important to note that regardless of which regulatory part triggers the requirement for a Safety Case, the SMS requires that it must address all regulatory impacts (i.e.171, 172, 139H).</p>	<p>Airservices is updating its Safety Change Management Requirements (AA-NOS-SAF-0104) and the SCARD Template (AA-TEMP-SAF-0042) to include notification to CASA upon completion of the SCARD for any 'major' overall safety magnitude.</p>	21 Dec 12	S&A

24	<p>Airservices should improve the quality, consistency and timeliness of Safety Cases presented to CASA.</p>	<p>Airservices has recently introduced a number of improvement initiatives in relation to Safety Cases, including:</p> <ul style="list-style-type: none"> - Key stakeholders must explicitly agree on the safety argument and supporting evidence during the safety planning process. This includes identifying evidence that is required for conditional approval, subject to provision of remaining evidence prior to implementation of the change. - Safety Template and Project Safety Services Manual changes in December 2012 to standardise the use of appendices, attachments and referenced documents and provide guidance on suitable evidence items. Referenced documents will no longer be attached to Safety Cases and hyperlinks will be removed from electronic documents sent to CASA. - A new Work Package Management System launched on 3 Dec will ensure all resources are identified to meet agreed timelines. Project schedules must reflect linkages between safety activities, production of evidence items and development, review and submission of safety documents. This will ensure tasks on the critical path are not compromised (e.g. document review time). - A Project Safety Services Improvement Panel was created in November 2012 to focus on quality assurance and consistency including standardised methodology for use of GSN. 	<p>A Lean Six Sigma review of the project delivery pipeline as it relates to Safety Cases will be undertaken and it will specifically address content, quality, consistency and timeliness.</p> <p>An action plan will be developed to address any recommendations in the review.</p>	<p>Copy of the report and action plan</p>	<p>31 Mar 13</p>	<p>S&A and P&E</p>
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25	<p>Airservices should publish clear documentation regarding the roles of Airservices' commissioning process of new infrastructure and facilities and the roles of CASA in determining any safety evidence required prior to commissioning.</p>	<p>In September 2012 Airservices commenced an internal review to identify opportunities for improvements to the commissioning process and System Management Manual (SMM). Amendments include:</p> <ul style="list-style-type: none"> - Clarifying the various stages and approvals required to progress through Test Readiness, Mimic, OT&E, Ghosting and full Service Commissioning. - Guidance on commissioning multiple systems that together provide a service (e.g. a tower service requires the commissioning of various communications, radar, software and infrastructure to provide a full tower service) - The role of Engineering Authorities, Operational Authorities, Project Authorities and CASA in determining the safety and commissioning evidence requirements for each phase of system development in the provision of a regulated service. <p>Revised SMM to be published by 31 Mar 13.</p>	<p>Provide CASA with a copy of the updated SMM when complete.</p>	<p>Copy of updated SMM</p>	<p>14 Apr 13</p>	<p>S&A and P&E</p>
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26	<p>Airservices should provide more comprehensive Safety Management training for ATS staff on an ongoing basis.</p>	<p>Existing Safety Management training includes:</p> <ul style="list-style-type: none"> - Safety Management Awareness and Responsibility Training (SMART), mandatory for all ATC recruits from 9 Oct 12. - Education materials (SafetyBytes) are regularly issued to controllers to highlight emerging threats and risks. - Mandated training on FRMS, DAMP, and WHS has been delivered to ATCs. <p>An "SMS and Me" information booklet is under development and will be issued to all ATC staff in the field on 1 May 13 (Airservices National Day of Safety) and their understanding tested through an online quiz.</p> <p>Other safety training is identified and delivered as an output of the SMS in addition to mandated refresher training. Examples include compromised separation training which is mandated on an annual basis, mandated separation assurance training to ATCs.</p>	<p>Nil additional actions.</p>	<p>SMS information booklet</p>	<p>1 May 13</p>	<p>ATC, S&A and Academy</p>
27	<p>Airservices should review the process involving 'Direct Appointment Recruits' to better ensure the desired safety outcomes are achieved.</p>	<p>The Recognition of Prior Learning (RPL) process was identified as an area for improvement in the 2012 Learning Academy review. Allocation of resources to oversight the process by the new ATS School has strengthened Airservices RTO Recognition of Prior Learning (RPL) and Recognition of Current Competency (RCC) processes.</p> <p>For example, the ATS School has recently required that the ATC Curriculum Module 125: Scanning and Separation Assurance is a MANDATORY module for all ATS conversion programs to ensure improved safety outcomes.</p>	<p>Nil additional actions.</p>		<p>Complete</p>	<p>Learning Academy</p>

28	Airservices should review the application of its ATC Training Needs Analysis (TNA) process nationally to ensure better outcomes.	Recruitment has commenced for eight Operational Training Specialists (OTS); new roles created following the Learning Academy review in 2012. A key accountability of these roles is ensuring the quality and governance of the TNA process. The roles will be filled as soon as possible, with timing subject to competing resource demands of RTO reaccreditation.	Nil additional actions.	Advice to CASA when roles filled	30 Jun 13	Learning Academy
29	Airservices should conduct an annual formal review of ATS Refresher Training compliance and the results provided to CASA. The review should include an assessment of the effectiveness of the training from feedback provided by ATS check and standardisation officers and Continuous Service Improvement Officer.	Completion of Refresher Training is currently tracked in SAP Training and Events, and will be transferred to SAP Enterprise Learning in 2013. This module will give individual managers better visibility over training completion throughout the year.	Airservices will conduct an annual review of Refresher Training completion and effectiveness and provide a copy of the report to CASA.	Copy of annual review	First report due 31 Jul 13	ATC and Learning Academy
30	Airservices should review ATS Operational Supervision within the organisation.		See (5) above			ATC
31	Airservices should permanently split Surveillance information Services (SIS) and Approach Control (APP) functions to ensure that the APP service is not compromised.		An additional risk assessment to be conducted to determine whether CASA's recommended action is appropriate.	Copy of findings	31 Mar 13	ATC
32	Airservices should review Independent Visual Approach (IVA) procedures at Sydney in order to determine if sufficient risk mitigators are in place to ensure the continued safe operation of aircraft.	On 14 Nov 12 Airservices implemented revised wording on the Automated Terminal Information Service (ATI), drawing pilots attention to IVA procedures. In addition a Safety Bulletin on IVAs was issued following discussion with airlines. It is planned to review the procedure, with airline input in the first quarter of 2013.	Airservices will review the procedure, in conjunction with industry, and any agreed actions will be implemented	Advice to CASA on review outcome and actions.	30 Jun 13	ATC

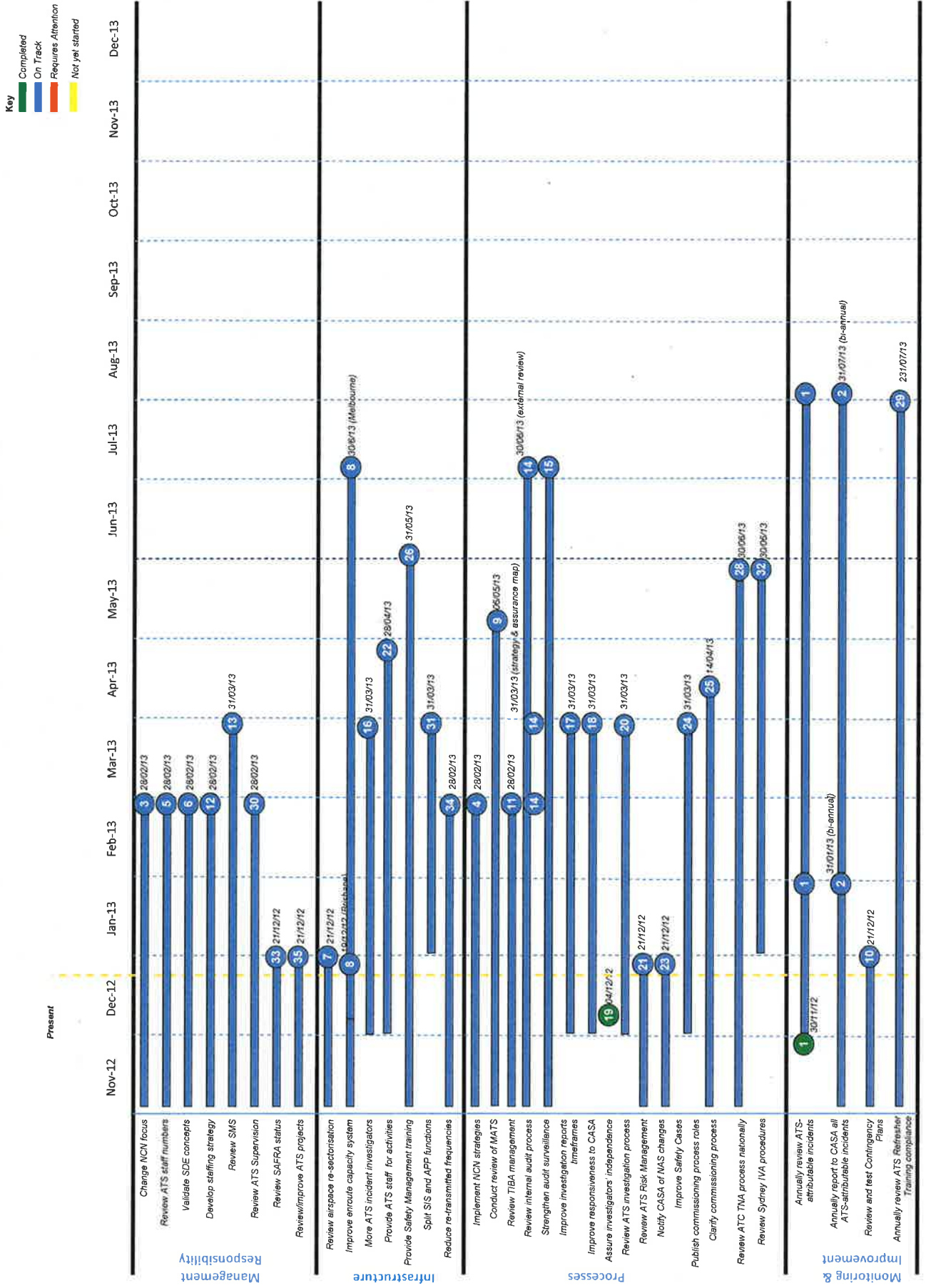
33	Airservices should review the status of Surveillance Approach for Regional Airports (SAFRA) and update implementation plans.		The implementation plan is currently being updated. Biannual progress reports will be provided to CASA.	Updated implementation on plan	21 Dec 12	ATC
34	Airservices should reduce the number of frequencies being re-transmitted.	Any decision to alter the use of retransmission is complex because retransmissions are currently used as a means of enhancing safety. Benefits are delivered through minimising call overlaps on frequencies, improving intelligibility and aiding controller workload.	A review of frequency retransmission commenced in November. A document that details all retransmission configurations from Brisbane and Melbourne has been completed. Details for other major locations will be completed by 14 December 2012. A risk workshop is scheduled for January 2013 involving ATC, engineering authorities and Safety. A report will be prepared and provided to CASA that captures the outcomes from the risk review and any intended actions.	Progress report	21 Dec 12 and every six months	Analysis - P&E Risk Review - S&A with ATC and P&E Report - S&A
35	Airservices should review and improve ATS project design and implementation.	Airservices has recognised the need to improve on project delivery. Early this year the Board agreed to an action plan developed by management. Progress against the agreed actions is reported to the Board on a regular basis.	Prepare a report for CASA on actions implemented or identified to improve project design and implementation. This will include actions resulting from external reviews as well as internally generated improvement actions.	Report	28 Feb 13	P&E

ARFF areas of concern

Recommendation	Existing review and improvement	Proposed Action	Evidence	Completion Date	Lead Action
<p>Documentation:</p> <ul style="list-style-type: none"> - inaccurate training records - invalid competency assessments - non compliance with internal policy and instructions - failure to sign off operational documents - obsolete documentation readily available <p>1</p>		<p>A action plan is being developed by ARFF Operations Managers to improve the compliance culture of our operational staff, including:</p> <ul style="list-style-type: none"> - setting clear expectations - improving line management accountabilities for compliance performance - coaching for improved performance and education. 	Copy of action plan	21 Dec 12	ARFF
<p>Training: the failure of Airservices to apply operational foam to a fire by fire-fighters during training.</p> <p>2</p>	<p>Safety cases were approved by CASA on June and August 2012 providing for:</p> <ul style="list-style-type: none"> - annual application of foam using a hand line - 3 yearly application of foam from a monitor 	<p>The relevant exemptions will be sought from CASA when the initial round of branch line training is complete at the end of 2012.</p>	<p>Evidence regarding training completion and exemption request to CASA</p>	31 Jan 12	ARFF
<p>SMS and operational maintenance: failure to produce foam on 26 October.</p> <p>3</p>	<p>Upon identification of the issue all vehicles across Airservices fleet were tested and are producing foam. Monthly testing has been established for all vehicles.</p>	<p>The engineering investigation is underway. CASA is being kept informed of progress (fortnightly updates) and will be provided a copy of the final report.</p>	Investigation Report	28 Feb 13	ARFF

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<p>4</p> <p>Port Hedland: length of time taken to establish an ARFFs, no interim service</p>		<p>Implement an "interim" Category 5 ARFF service from May 2013.</p> <p>Increase to Category 6 in July 2013 and the permanent Category 7 service will be operational in March 2014.</p>	<p>Formal notification to CASA following board decision and request for relevant exemptions</p>	<p>31 May 13</p>	<p>ARFF</p>
<p>5</p> <p>Expired 139H exemption: CFBT training and UFU concerns regarding WHS issues</p>	<p>Following the emergence of this issue we established a robust process for tracking and monitoring all CASR exemption instrument conditions and expiry dates.</p> <p>We have established an Airservices/UFU Working Group to address the WHS concerns raised by the UFU with oversight provided by Comcare.</p>	<p>Establish a clear process for future ARFFS establishment in compliance with the existing regulations. Preliminary discussions have been held with CASA.</p> <p>Nil further action.</p>	<p>Proposal to CASA</p> <p>CASA has been advised.</p>	<p>30 Apr 13</p> <p>Complete</p>	<p>ARFF</p> <p>ARFF</p>

CASA 172 Review - Actions Timeline



Attachment 2:

**CASA Review of CASR Part 172 Approval of Airservices Australia –
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1	<p>Airservices should conduct an annual review of all ATS-attributable BOS, LOSA and other significant incidents to identify the root causes and any trends, whilst ensuring robust and effective systemic corrective actions are put in place.</p>	Airservices will conduct a review and develop a report to provide to CASA on a bi-annual basis.	<p>Report addressing data July to December will be prepared and provided to CASA by the end of January 2013.</p> <p>Each subsequent bi-annual report will be prepared and provided to CASA within one month of end of period.</p>	Report	30 Nov 12	Complete
					31 Jan 13	On track
					31 Jan and 31 July each year	On track
2	<p>Airservices should provide a detailed report of the annual review of all ATS-attributable BOS, LOSA and other significant incidents to CASA including the safety outcomes of the review with action plan details to address any safety identified issues.</p>	<p>See (1) above.</p>				
3	<p>Airservices should change its focus from concern over the number of NCNs issued at audit, to identifying their root cause.</p>	<p>Airservices is conducting systemic analysis of Part 172 NCNs to assess the:</p> <ul style="list-style-type: none"> - level and nature of recurrence of NCNs and - robustness/effectiveness of root cause analysis and agreed actions <p>Opportunities for improvements will be identified and actions developed and advised to CASA.</p>	Advice to CASA on outcome of analysis and proposed actions	28 Feb 13	On track. Review and analysis has commenced.	

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<p>Airservices should identify and implement strategies to identify the root cause(s) of NCNs issued, specifically including:</p> <ul style="list-style-type: none"> - Improving Document Control processes, including fixing Contingency Plan issues; - Improving the SMS; - Identifying strategies for achieving greater compliance with the Operations Manual by ATS staff; and - Improving the Training and Checking processes. 	<p>See (3) above. The systemic review will specifically look at these areas.</p>			
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<p>Airservices should conduct a detailed review of ATS staff numbers to ensure that sufficient suitability qualified and trained personnel are available to provide and supervise at all times the appropriate levels of ATS.</p>	<p>An external review will be conducted by NavCanada.</p>	<p>Terms of Reference</p> <p>Review report</p>	<p>21 Dec 12</p> <p>28 Feb 13 (subject to availability of contractor)</p>	<p>Complete</p> <p>On track. NavCanada commenced on 7 January 2012.</p>
<p>5</p>				
<p>6</p>	<p>See (5).</p>			

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7	Airservices should fast-track improvements to the ATS re-sectorisation of airspace in the Brisbane Basin, Western Australia and South Australia, including a review of air routes, holding patterns, workstations and staffing.	Airservices is reviewing implementation timeframes and updated advice will be provided to CASA.	Letter to CASA	21 Dec 12	Complete	
8	Airservices should improve the demand/capacity system for enroute Sectors by examining the application of ATM tools and processes for traffic management used in foreign state jurisdictions.	Nil additional actions.		Brisbane 19 Dec 12	Complete. Workload reduction already visible in Fraser and Byron sectors.	
				Melbourne June 13	On track. Precursor work with Melbourne airport on gate management is commencing in February.	
9	Airservices should conduct a holistic review of Manual of Air Traffic Services (MATS) in conjunction with the Department of Defence in order to update the suite of ATS procedures and standards to obtain increased efficiency and international harmonisation.	Nil additional actions.	MATS Chapter 10	30 May 2013	On track. Internal consultation has commenced.	
10	Airservices should regularly review and test Contingency Plans at a local and national level to ensure that they are fit for purpose in an operational environment.	Provide CASA with an annual plan for testing	2013 Plan	21 Dec 12	Complete	

Recommendation		Action	Evidence	Completion Date	Progress (at 16 January 2012)
11	Airservices should review the way TIBA is currently managed as the Contingency Plan documentation, procedures and requirements are complex and have failed, at times, to adequately provide an acceptable level of safety to the travelling public.	In addition to airspace release arrangements already implemented, Airservices is developing a contingency endorsement to improve the way we manage short notice staff unavailability and avoid use of TIBA. Contingency plan documents, procedures and requirements being addressed under (10) above.	Advice to CASA with supporting evidence once endorsement is developed	28 Feb 13	On track. Planning has commenced.
12	Airservices should develop a staffing strategy that will ensure that ATS are provided without the need to employ the contingency measure of TIBA for non-catastrophic events such as staff illness or injury.	See (11) above.			
13	Airservices should conduct a complete review of its SMS, including its effectiveness to achieve its stated safety objectives relative to the provision of ATS.	External review to be completed.	Terms of Reference Report	21 Dec 12 31 Mar 13 23 Apr 13	Complete Dr Rob Lee will commence the review 4 February 2013. Due to Dr Lee's other commitments the review will not be finalised until mid-late April 2013.
14	Airservices should review the effectiveness of its internal audit process in relation to CASA and ICAO requirements regarding ATS.	Provide detailed evidence to CASA of internal audit process and its alignment with Part 172 and ICAO 4444 for ATC operational audits, including supporting documentation. Provide evidence to CASA of sufficient access to SME's for Part 172 audits from 2010-11 to present.	Step through detailed evidence of audit process with CASA List of SMEs	28 Feb 12 28 Feb 12	A meeting with CASA has been established for 6 February 2012. The list has been prepared and will be provided to CASA and discussed at the meeting scheduled for 6 February 2012.

Recommendation		Action	Evidence	Completion Date	Progress (at 16 January 2012)
		Document the Part 172 audit strategy to improve the robustness of the audit plan.	Copy of Part 172 audit strategy	31 Mar 13	On track. The document is under development.
		Prepare an assurance map for our Part 172 compliance.	Copy of assurance map	31 Mar 13	On track. An external consultant, External Management Consultants, is being engaged to prepare the map.
		Commission an external review of the audit process for Part 172.	Copy of review	30 Jun 13	On track. Early planning on a suitable contractor and procurement process has commenced.
15	Airservices should strengthen its audit surveillance program.	See (14) above.			
16	Airservices should have more suitably trained ATS incident investigators available to conduct more investigations of ATS-attributable incidents in order to identify root causes.	The effectiveness of the investigation process will be included in the external SMS review at item (13). Airservices will conduct a Lean Six Sigma review of investigation process, to inform a decision on process improvements and investigation resourcing.	SMS review report Lean Six Sigma review report	31 Mar 13	On track. See (5). On track. A review charter has been agreed with internal stakeholders and the review has commenced.
17	Airservices should improve its timeframe for the finalisation of incident investigation reports so as to identify and address deficiencies in practices and procedures.	See (16) above			

Recommendation		Action	Evidence	Completion Date	Progress (at 16 January 2012)
18	Airservices should improve its responsiveness to CASA's request for investigation results to provide evidence that root causes have been identified and addressed.	See (16) above			
19	Airservices should assure the investigators' independence when forming recommendations for agreed corrective action' with the business group manager.	As an additional measure, a rotation program is now in place with an investigator being assigned investigations at other ATC facilities other than normal place of employment. Rotation will be based on a minimum of 4 investigations at other locations per annum.	Internal Memo	3 Dec 12	Complete
20	Airservices should review its ATS incident investigation process in order to better identify systemic issues.	See (16) above.			
21	Airservices should review its ATS Risk Management processes so that operational staff have better visibility of hazards and current risk levels, and are more involved in risk ownership and mitigation.	All ATC line managers have been reminded of their accountabilities for risk management.	Completion of tactical ORAs	21 Dec 12	Complete
			Memo to ATC managers	3 Dec 12	
22	Airservices should ensure that suitability qualified ATS staff are provided for safety activities, such as Hazard Identification workshops, incident investigations, testing of new equipment and other safety related, efficiency and support activities.	Airservices will conduct an audit to examine a sample of safety activities over the last six months to ensure that sufficient ATS staff participated in safety related activities .where ATC expertise was required.	Copy of audit report	28 Apr 13	On track. The audit has commenced.

Recommendation		Action		Evidence	Completion Date	Progress (at 16 January 2012)
23	Airservices should notify CASA of all 'significant' changes to the National Airspace Systems (NAS) that may affect the provision of ATS. CASA will determine which changes will require further safety evidence.	Airservices is updating its Safety Change Management Requirements (AA-NOS-SAF-0104) and the SCARD Template (AA-TEMP-SAF-0042) to include notification to CASA upon completion of the SCARD for any 'major' overall safety magnitude.	Advice and copy of procedure provided to CASA.	21 Dec 12	Complete. The documents have been updated.	
24	Airservices should improve the quality, consistency and timeliness of Safety Cases presented to CASA.	A Lean Six Sigma review of the project delivery pipeline as it relates to Safety Cases will be undertaken and it will specifically address content, quality, consistency and timeliness. An action plan will be developed to address any recommendations in the review.	Copy of the report and action plan	31 Mar 13	On track. A review charter has been agreed with internal stakeholders and the review has commenced.	
25	Airservices should publish clear documentation regarding the roles of Airservices' commissioning process of new infrastructure and facilities and the roles of CASA in determining any safety evidence required prior to commissioning.	Provide CASA with a copy of the updated SMM when complete.	Copy of updated SMM	14 Apr 13	On track. Internal consultation and drafting of changes is underway.	
26	Airservices should provide more comprehensive Safety Management training for ATS staff on an ongoing basis.	An 'SMS and me' booklet is under development.	SMS information booklet	1 May 13	On track.	
27	Airservices should review the process involving 'Direct Appointment Recruits' to better ensure the desired safety outcomes are achieved.	Nil additional actions.			Complete	

Recommendation		Action	Evidence	Completion Date	Progress (at 16 January 2012)
28	Airservices should review the application of its ATC Training Needs Analysis (TNA) process nationally to ensure better outcomes.	Recruitment of eight Operational Training Specialists.	Advice to CASA when roles filled	30 Jun 13	On track. Recruitment process is underway. It is expected that filling all eight positions with suitable candidates may take some time.
29	Airservices should conduct an annual formal review of ATS Refresher Training compliance and the results provided to CASA. The review should include an assessment of the effectiveness of the training from feedback provided by ATS check and standardisation officers and Continuous Service Improvement Officer.	Airservices will conduct an annual review of Refresher Training completion and effectiveness and provide a copy of the report to CASA.	Copy of annual review	Annual. First report due 31 Jul 13	Will commence in July 2013.
30	Airservices should review ATS Operational Supervision within the organisation.	See (5) above			
31	Airservices should permanently split Surveillance information Services (SIS) and Approach Control (APP) functions to ensure that the APP service is not compromised.	An additional risk assessment to be conducted to determine whether CASA's recommended action is appropriate.	Copy of findings	31 Mar 13	On track. Planning of safety management activities is underway.
32	Airservices should review Independent Visual Approach (IVA) procedures at Sydney in order to determine if sufficient risk mitigators are in place to ensure the continued safe operation of aircraft.	Airservices will review the procedure, in conjunction with industry, and any agreed actions will be implemented	Advice to CASA on review outcome and actions.	30 Jun 13	Not yet commenced.
33	Airservices should review the status of Surveillance Approach for Regional Airports (SAFRA) and update	The implementation plan is currently being updated. Biannual progress reports will be provided to CASA.	Updated implementation plan	21 Dec 12	Complete

Recommendation		Action	Evidence	Completion Date	Progress (at 16 January 2012)
	implementation plans.		Progress report	21 Dec 12 and every six months	
34	Airservices should reduce the number of frequencies being re-transmitted.	A review of frequency retransmission commenced in November. A document that details all retransmission configurations from Brisbane and Melbourne has been completed. Details for other major locations will be completed by 14 December 2012. A risk workshop is scheduled for January 2013 involving ATC, engineering authorities and Safety. A report will be prepared and provided to CASA that captures the outcomes from the risk review and any intended actions.	Report	28 Feb 13	On track. A risk workshop was conducted on 16 January 2013.
35	Airservices should review and improve ATS project design and implementation.	Prepare a report for CASA on actions implemented or identified to improve project design and implementation. This will include actions resulting from external reviews as well as internally generated improvement actions.	Report	21 Dec 12	Complete

ARFF areas of concern

Recommendation	Proposed Action	Evidence	Completion Date	Progress
<p>1</p> <p>Documentation:</p> <ul style="list-style-type: none"> - inaccurate training records - invalid competency assessments - non compliance with internal policy and instructions - failure to sign off operational documents - obsolete documentation readily available 	<p>A action plan is being developed by ARFF Operations Managers to improve the compliance culture of our operational staff, including:</p> <ul style="list-style-type: none"> - setting clear expectations - improving line management accountabilities for compliance performance - coaching for improved performance and education. 	<p>Copy of action plan</p>	<p>21 Dec 12</p>	<p>Complete</p>
<p>2</p> <p>Training: the failure of Airservices to apply operational foam to a fire by fire-fighters during training.</p>	<p>The relevant exemptions will be sought from CASA when the initial round of branch line training is complete at the end of 2012.</p>	<p>Evidence regarding training completion and exemption request to CASA</p>	<p>31 Jan 12</p>	<p>On track. Training is complete and the relevant exemption is being drafted.</p>
<p>3</p> <p>SMS and operational maintenance: failure to produce foam on 26 October.</p>	<p>The engineering investigation is underway. CASA is being kept informed of progress (fortnightly updates) and will be provided a copy of the final report.</p>	<p>Investigation Report</p>	<p>28 Feb 13</p>	<p>On track.</p>

Recommendation	Proposed Action	Evidence	Completion Date	Progress
<p>4</p> <p>Port Hedland: length of time taken to establish an ARFFs, no interim service</p>	<p>Implement an "Interim" Category 5 ARFF service from May 2013.</p> <p>Increase to Category 6 in July 2013 and the permanent Category 7 service will be operational in March 2014.</p>	<p>Formal notification to CASA following board decision and request for relevant exemptions</p>	<p>31 May 13</p>	<p>Airservices met with CASA on 15 January and we have an agreed way forward on the regulatory approach.</p>
	<p>Establish a clear process for future ARFFS establishments in compliance with the existing regulations. Preliminary discussions have been held with CASA.</p>	<p>Proposal to CASA</p>	<p>30 Apr 13</p>	<p>On track for a paper to the April board meeting.</p>
<p>5</p> <p>Expired 139H exemption: CFBT training and UFU concerns regarding WHS issues.</p>	<p>Nil further action.</p>	<p>CASA has been advised.</p>		<p>Complete</p>

Attachment 3:

**CASA Review of CASR Part 172 Approval of Airservices Australia –
Action Response – 22 July 2013**

CASA Review of CASR Part 172 Approval of Airservices Australia – Action Response - 22 July 2013

Recommendation	Action	Evidence	Completion Date	Progress (at 22 July 2013)
1	<p>Airservices should conduct an annual review of all ATS-attributable BOS, LOSA and other significant incidents to identify the root causes and any trends, whilst ensuring robust and effective systemic corrective actions are put in place.</p>	<p>Airservices will conduct a review and develop a report to provide to CASA on a bi-annual basis.</p> <p>Report addressing data July to December will be prepared and provided to CASA by the end of January 2013.</p> <p>Each subsequent bi-annual report will be prepared and provided to CASA within one month of end of period.</p>	<p>30 Nov 12</p> <p>31 Jan 13</p> <p>31 Jan and 31 July each year</p>	<p>Complete</p> <p>Complete</p> <p>Complete. Ongoing action in place.</p>
2	<p>Airservices should provide a detailed report of the annual review of all ATS-attributable BOS, LOSA and other significant incidents to CASA including the safety outcomes of the review with action plan details to address any safety identified issues.</p>	<p>See (1) above.</p>		
3	<p>Airservices should change its focus from concern over the number of NCNs issued at audit, to identifying their root cause.</p>	<p>Airservices is conducting systemic analysis of Part 172 NCNs to assess the:</p> <ul style="list-style-type: none"> - level and nature of recurrence of NCNs and - robustness/effectiveness of root cause analysis and agreed actions <p>Opportunities for improvements will be identified and actions developed and advised to CASA.</p>	<p>28 Feb 13</p>	<p>Complete</p>

Recommendation	Action	Evidence	Completion Date	Progress (at 22 July 2013)
<p>Airservices should identify and implement strategies to identify the root cause(s) of NCNs issued, specifically including:</p> <ul style="list-style-type: none"> - Improving Document Control processes, including fixing Contingency Plan issues; - Improving the SMS; - Identifying strategies for achieving greater compliance with the Operations Manual by ATS staff; and - Improving the Training and Checking processes. 	<p>See (3) above. The systemic review will specifically look at these areas.</p>			Complete
<p>Airservices should conduct a detailed review of ATS staff numbers to ensure that sufficient suitability qualified and trained personnel are available to provide and supervise at all times the appropriate levels of ATS.</p>	<p>An external review will be conducted by NavCanada.</p>	<p>Terms of Reference</p>	<p>21 Dec 12</p>	Complete
<p>Airservices should review the validity of the Service Delivery Environment concepts, its impact on the availability of ATS resources, and the status of the rollout including revised timelines.</p>	<p>A report has been prepared for CASA.</p>	<p>Review report</p>	<p>28 Feb 13</p>	Complete

Recommendation	Action	Evidence	Completion Date	Progress (at 22 July 2013)
7 Airservices should fast-track improvements to the ATS re-sectorisation of airspace in the Brisbane Basin, Western Australia and South Australia, including a review of air routes, holding patterns, workstations and staffing.	Airservices is reviewing implementation timeframes and updated advice will be provided to CASA.	Letter to CASA	21 Dec 12	Complete
8 Airservices should improve the demand/capacity system for enroute Sectors by examining the application of ATM tools and processes for traffic management used in foreign state jurisdictions.	Nil additional actions.		Brisbane 19 Dec 12 Melbourne June 13 October 13	Complete. Workload reduction already visible in Fraser and Byron sectors. Deployment is now expected in October 2013. The delay is due to required vendor software updates not yet delivered and airline readiness.
9 Airservices should conduct a holistic review of Manual of Air Traffic Services (MATS) in conjunction with the Department of Defence in order to update the suite of ATS procedures and standards to obtain increased efficiency and international harmonisation.	Nil additional actions.	MATS Chapter 10	30 May 2013	Complete
10 Airservices should regularly review and test Contingency Plans at a local and national level to ensure that they are fit for purpose in an operational environment.	Provide CASA with an annual plan for testing	2013 Plan	21 Dec 12	Complete

Recommendation		Action		Evidence	Completion Date	Progress (at 22 July 2013)
11	Airservices should review the way TIBA is currently managed as the Contingency Plan documentation, procedures and requirements are complex and have failed, at times, to adequately provide an acceptable level of safety to the travelling public.	In addition to airspace release arrangements already implemented, Airservices is developing a contingency endorsement to improve the way we manage short notice staff unavailability and avoid use of TIBA. Contingency plan documents, procedures and requirements being addressed under (10) above.	Advice to CASA with supporting evidence once endorsement is developed	28 Feb 13	Complete	
12	Airservices should develop a staffing strategy that will ensure that ATS are provided without the need to employ the contingency measure of TIBA for non-catastrophic events such as staff illness or injury.	See (11) above.			Complete	
13	Airservices should conduct a complete review of its SMS, including its effectiveness to achieve its stated safety objectives relative to the provision of ATS.	External review to be completed.	Terms of Reference	21 Dec 12	Complete	
			Report	31-Mar-13 30-Apr-13 31 May 13	Complete	
14	Airservices should review the effectiveness of its internal audit process in relation CASA and ICAO requirements regarding ATS.	Provide detailed evidence to CASA of internal audit process and its alignment with Part 172 and ICAO 4444 for ATC operational audits, including supporting documentation.	Step through detailed evidence of audit process with CASA	28 Feb 13	Complete.	
		Provide evidence to CASA of sufficient access to SME's for Part 172 audits from 2010-11 to present.	List of SMEs	28 Feb 13	Complete	
		Document the Part 172 audit strategy to improve the robustness of the audit plan.	Copy of Part 172 audit strategy	31 Mar 13	Complete.	

Recommendation		Action		Evidence	Completion Date	Progress (at 22 July 2013)
		Prepare an assurance map for our Part 172 compliance.		Copy of assurance map	31 Mar 13	Complete
		Commission an external review of the audit process for Part 172.		Copy of review	30 Jun 13	Complete
15	Airservices should strengthen its audit surveillance program.	See (14) above.				
16	Airservices should have more suitably trained ATS incident investigators available to conduct more investigations of ATS-attributable incidents in order to identify root causes.	The effectiveness of the investigation process will be included in the external SMS review at item (13). Airservices will conduct a Lean Six Sigma review of investigation process, to inform a decision on process improvements and investigation resourcing.		SMS review report	31 Mar 13 30 Apr 13 31 May 13	Complete
17	Airservices should improve its timeframe for the finalisation of incident investigation reports so as to identify and address deficiencies in practices and procedures.	See (16) above		Lean Six Sigma review report	31 Mar 13	Complete
18	Airservices should improve its responsiveness to CASA's request for investigation results to provide evidence that root causes have been identified and addressed.	See (16) above				

Recommendation		Action		Evidence	Completion Date	Progress (at 22 July 2013)
19	Airservices should assure the investigators' independence when forming recommendations for agreed corrective action' with the business group manager.	As an additional measure, a rotation program is now in place with an investigator being assigned investigations at other ATC facilities other than normal place of employment. Rotation will be based on a minimum of 4 investigations at other locations per annum.	Internal Memo	3 Dec 12	Complete	
20	Airservices should review its ATS incident investigation process in order to better identify systemic issues.	See (16) above.				
21	Airservices should review its ATS Risk Management processes so that operational staff have better visibility of hazards and current risk levels, and are more involved in risk ownership and mitigation.	All ATC line managers have been reminded of their accountabilities for risk management.	Completion of tactical ORAs	21 Dec 12	Complete	
			Memo to ATC managers	3 Dec 12		
22	Airservices should ensure that suitability qualified ATS staff are provided for safety activities, such as Hazard Identification workshops, incident investigations, testing of new equipment and other safety related, efficiency and support activities.	Airservices will conduct an audit to examine a sample of safety activities over the last six months to ensure that sufficient ATS staff participated in safety related activities where ATC expertise was required.	Copy of audit report	28 Apr 13	Complete.	
23	Airservices should notify CASA of all 'significant' changes to the National Airspace Systems (NAS) that may affect the provision of ATS. CASA will determine which changes will require further safety evidence.	Airservices is updating its Safety Change Management Requirements (AA-NOS-SAF-0104) and the SCARD Template (AA-TEMP-SAF-0042) to include notification to CASA upon completion of the SCARD for any 'major' overall safety magnitude.	Advice and copy of procedure provided to CASA.	21 Dec 12	Complete.	

Recommendation		Action		Evidence	Completion Date	Progress (at 22 July 2013)
24	Airservices should improve the quality, consistency and timeliness of Safety Cases presented to CASA.	<p>A Lean Six Sigma review of the project delivery pipeline as it relates to Safety Cases will be undertaken and it will specifically address content, quality, consistency and timeliness.</p> <p>An action plan will be developed to address any recommendations in the review.</p>	Copy of the report and action plan	31 Mar 13	Complete.	
25	Airservices should publish clear documentation regarding the roles of Airservices' commissioning process of new infrastructure and facilities and the roles of CASA in determining any safety evidence required prior to commissioning.	Provide CASA with a copy of the updated SMM when complete.	Copy of updated SMM	14 Apr 13	Complete.	
26	Airservices should provide more comprehensive Safety Management training for ATS staff on an ongoing basis.	<p>An 'SMS and me' booklet is under development. It will be distributed to all staff and contractors on the Airservices 'Day of Safety'</p> <p>Airservices will review the existing safety training requirements procedure and republish.</p> <p>An independent review of Airservices' SMS is underway that will encompass safety training. See (13) above.</p>	<p>SMS information booklet</p> <p>Updated procedure</p>	<p>1 May 13</p> <p>10 Apr 13 30 Sept 13</p>	<p>Complete.</p> <p>The safety training requirements matrix was updated in April. The SMS review findings are now being addressed. Updated by procedure to be released by end of September 2013.</p> <p>Complete</p>	
27	Airservices should review the process involving 'Direct Appointment Recruits' to better ensure the desired safety outcomes are achieved.	Nil additional actions.			Complete	

Recommendation		Action		Evidence	Completion Date	Progress (at 22 July 2013)
28	Airservices should review the application of its ATC Training Needs Analysis (TNA) process nationally to ensure better outcomes.	Recruitment of eight Operational Training Specialists.	Advice to CASA when roles filled	30 Jun 13 16 Aug 13	Seven have been appointed. A selection process is underway for the final position.	
29	Airservices should conduct an annual formal review of ATS Refresher Training compliance and the results provided to CASA. The review should include an assessment of the effectiveness of the training from feedback provided by ATS check and standardisation officers and Continuous Service Improvement Officer.	Airservices will conduct an annual review of Refresher Training completion and effectiveness and provide a copy of the report to CASA.	Copy of annual review	Annual. First report due 31 Jul 13	On track.	
30	Airservices should review ATS Operational Supervision within the organisation.	See (5) above				
31	Airservices should permanently split Surveillance information Services (SIS) and Approach Control (APP) functions to ensure that the APP service is not compromised.	An additional risk assessment to be conducted to determine whether CASA's recommended action is appropriate.	Copy of findings	31 Mar 13	Complete	
32	Airservices should review Independent Visual Approach (IVA) procedures at Sydney in order to determine if sufficient risk mitigators are in place to ensure the continued safe operation of aircraft.	Airservices will review the procedure, in conjunction with industry, and any agreed actions will be implemented	Advice to CASA on review outcome and actions.	30 Jun 13	Complete.	
33	Airservices should review the status of Surveillance Approach for Regional Airports (SAFRA) and update	The implementation plan is currently being updated. Biannual progress reports will be provided to CASA.	Updated implementation plan	21 Dec 12	Complete. December 12 and June 13 updates provided. Ongoing action in place.	

Recommendation		Action		Evidence	Completion Date	Progress (at 22 July 2013)
	implementation plans.			Progress report	21 Dec 12 and every six months	
34	Airservices should reduce the number of frequencies being re-transmitted.	A review of frequency retransmission commenced in November. A document that details all retransmission configurations from Brisbane and Melbourne has been completed. Details for other major locations will be completed by 14 December 2012. A risk workshop is scheduled for January 2013 involving ATC, engineering authorities and Safety. A report will be prepared and provided to CASA that captures the outcomes from the risk review and any intended actions.		Report	28 Feb 13	Complete
35	Airservices should review and improve ATS project design and implementation.	Prepare a report for CASA on actions implemented or identified to improve project design and implementation. This will include actions resulting from external reviews as well as internally generated improvement actions.		Report	21 Dec 12	Complete

ARFF areas of concern

Recommendation	Proposed Action	Evidence	Completion Date	Progress
<p>1</p> <p>Documentation:</p> <ul style="list-style-type: none"> - inaccurate training records - invalid competency assessments - non compliance with internal policy and instructions - failure to sign off operational documents - obsolete documentation readily available 	<p>A action plan is being developed by ARFF Operations Managers to improve the compliance culture of our operational staff, including:</p> <ul style="list-style-type: none"> - setting clear expectations - improving line management accountabilities for compliance performance - coaching for improved performance and education. 	<p>Copy of action plan</p>	<p>21 Dec 12</p>	<p>Complete</p>
<p>2</p> <p>Training: the failure of Airservices to apply operational foam to a fire by fire-fighters during training.</p>	<p>The relevant exemptions will be sought from CASA when the initial round of branch line training is complete at the end of 2012.</p>	<p>Evidence regarding training completion and exemption request to CASA</p>	<p>31 Jan 12</p>	<p>Complete.</p>
<p>3</p> <p>SMS and operational maintenance: failure to produce foam on 26 October.</p>	<p>The engineering investigation is underway. CASA is being kept informed of progress (fortnightly updates) and will be provided a copy of the final report.</p>	<p>Investigation Report</p>	<p>28 Feb-13 31 Mar 13</p>	<p>Complete.</p>

Recommendation	Proposed Action	Evidence	Completion Date	Progress
<p>4</p> <p>Port Hedland: length of time taken to establish an ARFFs, no interim service</p>	<p>Implement an "interim" Category 5 ARFF service from May 2013.</p> <p>Increase to Category 6 in July 2013 and the permanent Category 7 service will be operational in March 2014.</p>	<p>Formal notification to CASA following board decision and request for relevant exemptions</p>	<p>31 May 13</p>	<p>Complete.</p>
	<p>Establish a clear process for future ARFFS establishment in compliance with the existing regulations.</p>	<p>Proposal to CASA</p>	<p>30 Apr 13 30 Jun 13</p>	<p>Complete</p>
<p>5</p> <p>Expired 139H exemption: CFBT training and UFU concerns regarding WHS issues</p>	<p>Nil further action.</p>	<p>CASA has been advised.</p>		<p>Complete</p>