DSA01.2
Implementation of Defence Policy for Health, Safety and Environmental Protection

Chapter 2
Requirement for Safety and Environmental Management Systems in Defence
Foreword

The Defence Operating Model establishes a single integrated framework of internal controls covering the entire Department which includes the designation of Defence Authorities. Although a Defence Authority, the Defence Safety Authority (DSA) operates outside of this framework in as far as it is directly accountable to the Secretary of State (SofS) for Defence and is not Held to Account by the Permanent Secretary; this is to ensure that organisational separation is maintained between those acting as a Regulatory Authority and those that deliver Defence outputs. To that end the SofS for Defence has empowered the DSA, by charter, for its roles as Regulator, Investigator and Defence Authority for safety. It has been granted independence from the rest of Defence (from financial, political and operational pressures) and is required to provide SofS with assurance that his policy on safety (including Health and Environmental Protection) in Defence is being promoted and implemented.

This policy and guidance provides a framework around which Defence demonstrates its compliance with the requirements of Health, Safety and Environmental Protection (HS&EP) legislation and where legislation is disapplied, that suitable arrangements are in place to safeguard personnel and the environment.

Authority

This document takes its authority from the SofSs’ policy statement for HS&EP and the DSA Charter. Compliance with these polices will be assured by the DSA and reported to the SofS and the Permanent Secretary via an Annual Assurance Report. Regulation will flow from the policies detailed within DSA01.1 and 01.2, but will be assured separately by the authoring Regulator. Domain specific policy and regulation will be detailed within the relevant DSA02 level publications. Defence is to comply with the DSA policies and Regulation with equal diligence and vigour. Should there be conflict between policy and Regulation within the DSA’s publication suite then in the first instance advice should be sought from the Policy Team in DSA HQ by email at DSA-HQ-SafetyEnquiries@mod.gov.uk.

Application

This policy and guidance applies to all Defence Organisations/Agencies and Defence activities.
Chapter 2


Scope

01.2.2

This chapter aims to:

1. Describe how Health, Safety and Environmental Protection (HS&EP)\(^1\) is to be managed across Defence.

2. Ensure a systematic, coherent and coordinated approach to HS&EP management via a “system of systems” across Defence.

3. Ensure that the interdependencies and risk transfer between accountable individuals within and between the Top Level Budgets (TLBs) and Defence Organisations\(^2\) is understood and managed effectively.

4. The term Safety and Environmental Management System (SEMS) is used to describe:

   a) The systematic approach that will be implemented across Defence for HS&EP management.

   b) The collection of specific arrangements put in place by the senior accountable individual within each TLB and Defence Organisation to describe how the policies defined within this Chapter will be implemented.

5. The term Defence SEMS is used to describe the collection of individual SEMS that have been put in place by each TLB and Defence Organisation and are coordinated, under the direction of the Defence Safety Committee (DSC), to monitor, report and manage HS&EP risks and impacts across Defence and up to the Defence Board.

Legal Requirement (Summary)

01.2.2 (1)

Management of Health and Safety at Work Regulations 1999

6. Regulation 5 of the Management of Health and Safety at Work Regulations 1999 requires that employers shall make and give effect to such arrangements\(^3\) as are appropriate, having regard to the nature of his undertaking, for the effective planning, organisation, control, monitoring and review of the preventative and proactive measures. Those safety arrangements that are put in place shall also be recorded.

\(^{1}\) For clarification this chapter and policy does not cover sustainable development. The MOD’s strategy and policy in this area is the responsibility of other departments within the MOD. For advice contact Fin Mil Cap.

\(^{2}\) The term Defence Organisation is used to describe those organisations which are not specifically TLBs. For example DE&S, DIO, DSTL and the DSA itself. The DSA will have to comply with this policy as well as providing input to the wider Defence SEMS.

\(^{3}\) Often referred to as Organisation and Arrangements (O&A).
### Legal Requirement (Summary) 01.2.2 (2)

**Environmental Protection**

7. Environmental legislation was introduced to provide protection to the environment which includes air, water, land, natural resources, flora, fauna, humans and their interrelationships. Where this legislation is applicable to Defence, it is implicit that Defence must have in place management arrangements that:

   a) assess the environmental impact (both positive and negative) of Defence activities;

   b) take measures to prevent or to reduce adverse effects on the environment at source; and

   c) require that those in Defence who are responsible for causing adverse effects on the environment pay to rectify, compensate or treat them.

### Policy 01.2.2 (1)

**Defence Requirement for the Nomination of Senior Accountable individuals for the Management of Health, Safety and Environmental Protection**

8. The Permanent Secretary (Perm Sec) shall ensure that senior individuals have been identified⁴ across Defence⁵ as being accountable for managing the health and safety (including Risk to Life)⁶ of the Department’s employees and protecting the environment from the impacts and risks associated with Defence activity.

### Policy 01.2.2 (2)

**Defence Requirement for Health, Safety and Environmental Protection Management Arrangements**

9. Senior individuals identified⁷ across Defence as being accountable for Health, Safety and Environmental Protection⁸ shall have in place appropriate arrangements for the effective planning, organisation, monitoring, reporting, continuous improvement in performance and the on-going review of the associated risks, impacts and control measures.

### Policy 01.2.2 (3)

**Defence Requirement for Safety and Environmental Management Systems**

10. Arrangements⁹ for HS&EP within TLBs, Defence Agencies and Trading Entities, shall be recorded and managed within an appropriate SEMS. SEMS shall identify dependencies and relationships with other SEMS across Defence and include the

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⁴ Nominated by name and informed by letter.
⁵ Within each TLB, Defence Agencies and Trading Entities.
⁶ As required by Duty Holding within Chapter 3 of DSA01.2.
⁷ By the Permanent Secretary.
⁸ From the impacts and risks associated with Defence activity.
⁹ And the outputs that they generate.
process of risk acceptance and reporting through command and business chains, up to the Defence Board.

Defence Requirement for the Nomination of Senior Accountable individuals for the Management of Health, Safety and Environmental Protection

11. The Perm Sec should be able to demonstrate that senior individuals have been nominated across Defence as being accountable for the management of health, safety (including Duty Holding) and Environmental Protection. Acceptance by individuals of their health, safety and environmental duties should be recorded.

Defence Requirement for Health, Safety and Environmental Protection Management Arrangements

12. TLB owners, Senior Duty Holders (SDHs) and Chief Executives (CEs) of Executive Agencies and Trading Entities should be able to demonstrate that:

a) They have in place policies and underpinning directives/order that describe the O&A for the management of HS&EP throughout their TLBs, Defence Agencies and Trading Entities;

b) The O&A should include, at an appropriate level, the duties, qualifications and experience required for individuals specifically nominated as accountable or responsible for HS&EP roles throughout the command and management chains;

c) All procedures and processes are documented to explain the implementation of these arrangements in terms of planning, organisation, performance monitoring, reporting, continuous improvement and on-going review of all control measures, safety risks and environmental risks and impacts.

Defence Requirement for Safety and Environmental Management Systems (SEMS)

13. TLB holders, SDHs and CEs of Defence Organisations should be able to demonstrate that they have in place an appropriate and effective SEMS for the systematic and continuous management of HS&EP.

14. The SEMS should describe how the organisation continuously improves its arrangements for managing HS&EP.

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10 As required to ensure that risk is held at the appropriate level within their organisation.
11 For all TLBs, Defence Agencies and Trading Entities and those high hazard activities identified as generating a credible and foreseeable Risk to Life.
12 Of their nomination and associated duties.
13 Noting that TLB holders and SDHs can be the same individuals.
14 Noting that TLB holders can also be SDHs.
15. The SEMS should describe how the organisation maintains safe work equipment and practices and employs safe systems of work for all personnel (including business partners and contractors\(^\text{15}\)).

16. The SEMS should describe how the organisation identifies and provides the training, information, instruction and supervision to ensure that policies, procedures and other control measures are implemented effectively.

17. The SEMS should describe the setting and monitoring of Measures of Performance and Measures of Effectiveness\(^\text{16}\) for the purpose of risk management and continuous improvement.

18. Although TLB Holders, SDHs and CEs can tailor SEMS to meet the specific needs of their organisations and activities, there is a need for a minimum level of consistency and coherence across Defence. To that end, when developing their SEMS, organisations should be able to demonstrate the following requirements have been met:

   a) How HS&EP management is embedded as part of routine command and business management;

   b) The extent to which authority and responsibility is delegated and how those that hold such positions are assessed as competent in terms of qualification and experience;

   c) The flow-down of requirements from the SofS’ Policy Statement, through the tailored arrangements of the TLB holder, SDH or CE through orders and directives down the command and business management chains;

   d) Set out the requirements for the management, communication, cooperation, coordination, competence and compliance assurance of any lodger organisations, business partners or contractors that contribute to Defence activities or work within or at locations within the organisation;

   e) Set out the arrangements for identifying, assessing and managing HS&EP risks and the arrangements for escalation and transfer through the business management and command chains for resolution. This should include risk transfer and/or risk dependency on other organisations and their SEMS;

   f) Set out the arrangements for consultation with Trades Unions and staff associations when necessary;

\(^{15}\) In accordance with contractual arrangements.

\(^{16}\) Measures of Performance (MoP) are concerned with business efficiency of the SEMS or owning organisation. Measures of Effectiveness (MoE) are concerned with the outcome or effect that Policy, Regulation, Assurance or Enforcement are having on stakeholder behaviours when managing HS&EP. Pan-Defence MoE that are mandated by the DSA or Defence Safety Committee will be issued as a policy statement in DSA01.2.
g) Identify environmental impacts and minimise any adverse effects;

h) Identify the HS&EP governance structure and its membership;

i) Set out how HS&EP assurance (first and second party) is achieved, including mechanisms for developing associated objectives and targets;

j) Identify a focal point for improvement of the SEMS, and associated feedback;

k) Identify sources of independent specialist HS&EP advice and support from competent Subject Matter Experts (SMEs);

l) Set out the arrangements for reporting and managing HS&EP events (eg accidents or environmental incidents);

m) Set out arrangements for Quality Assurance of the SEMS; and

n) Detail the requirement to undertake an Organisational Safety Assessment (OSA) to evaluate and manage the impact of change on safety.

19. A SEMS is a formal systematic approach for managing HS&EP.

20. The scope and structure of individual SEMS and the organisation of the overall Defence SEMS (as a system of systems) is detailed in Figures 1-7 in this Chapter. When establishing individual SEMS, TLB Holders, SDHs and CEs should:

   a) Establish an annual battle-rhythm as detailed in Steps 1-4 at Figure 1. The battle-rhythm should be defined to meet the specific needs of the TLB or Defence Organisation and provide input to the pan-Defence management and performance reporting cycle via; the Annual Assurance Report managed by Director General DSA, the Quarterly Performance Report managed by Perm Sec, inputs to the DSC and its supporting Stakeholder Committees.

   b) Ensure that individual SEMS deliver the activities and outputs defined at Figures 4-7 during annual battle-rhythm.

21. Compliance with this Chapter will be assured by DSA HQ but statutory and Defence Regulators may also consider the effectiveness of SEMS as part of gathering regulatory evidence. The DSA HQ will ensure that these activities are coordinated to avoid duplication.

22. In its most basic form ISO 14001 and the HSE recommends that a system for managing HS&EP uses a simple approach: Plan, Do, Check, Act. This is described in more detail in the Health and Safety
Executive (HSE) Guidance Note number 65 (HSG 65) “Managing for Health and Safety”\textsuperscript{17} and can be used as a source of additional guidance.

\textbf{Related Documents 01.2.2}

[This section will remain blank until the initial DSA01 document set has been completed]

\textsuperscript{17} Available as a download from the HSE website.
Figure 1 - DEFENCE SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM COMPONENTS & CYCLE

**Implementation Products & Activities**

**Step 1 - Plan for Safety “Plan”**
- Reviews of Hazard Logs & Risk Registers
- Review performance reports
- Analyse safety information (Measure of Effectiveness and Performance)
- Engagement with ITE, ISA, Subject Matter Experts, External Bodies to benchmark
- Conduct Horizon Scanning of Legislation, future Technology and Capability Equipment Programme
- Undertake OSAs to assess impact of Change of safety
- Undertake In-Year of funding (as affecting activity & safety)
- Consider SQEP & resilience of workforce

**Step 2 - Implement Safety Programs “Do”**
- Define & issue the rule set
- Undertake Risk mitigation & control

**Step 3 – Monitor Performance & Assure Compliance “Check”**
- Undertake Corrective Action & Continuous Improvement
- Understand Effectiveness

**Step 4 - Conduct Management Reviews “Act”**
- Undertake OSAs to assess impact of Change of safety
- Undertake In-Year of funding (as affecting activity & safety)
- Consider SQEP & resilience of workforce

**Implementation Products & Activities**

**Step 2 - Deliver/Undertake:**
- Establish & sustain safety organisations & governance
- Train & Educate workforce
- Issue delegations & report on individual & collective performance & culture
- Issue Organisational Approvals
- Issue licences
- Ensure compliance with safety policy, regulation & process
- Demonstrate leadership
- Empowered Workforce
- Ensure Just Culture
- Certify Equipment
- Maintain Equipment
- Manage safety risk to ALARP
- Retain records of decision making
- Ensure timely Corrective Action

**Step 3 - Deliver/Undertake:**
- Conduct assurance - 1st/2nd/3rd Party
- Report & analyse safety performance
- Investigate, report & analyse incidents
- Anonymous reporting of workforce concerns
- Take Enforcement Action
- Undertake independent investigation
- Retain assurance records
- Undertake Information Knowledge Management to enable management reviews
Figure 2 - DEFENCE SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM - SCOPE & GOVERNANCE AS A SYSTEM OF SYSTEMS

1. JFC also Force Generates
2. DE&S also Duty Holds
3. Equipment & Services require SEMS interface with Industry
**DEFENCE SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM IMPLEMENTATION**

**Defence Safety Authority**

DEFENCE SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM - SCOPE & GOVERNANCE AS A SYSTEM OF SYSTEMS

**Implement Steps 1 to 4 to deliver governance, to assure, to ensure**

**Figure 3**

DEFENCE SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM COMPONENTS & CYCLE

**Figure 4**

DETAILED DISPLAYS OF DEPENDENCIES & ASSOCIATIONS:
- **Step 1**: Define & Scope
  - Identify all safety & environmental activity
  - Define & scope
  - Identify all safety & environmental activity

- **Step 2**: Plan & Prepare
  - Define & scope
  - Identify all safety & environmental activity

- **Step 3**: Implement & Operate
  - Define & scope
  - Identify all safety & environmental activity

- **Step 4**: Review & Improve
  - Define & scope
  - Identify all safety & environmental activity

**DEFENCE SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM IMPLEMENTATION**

**Figure 4 – Defence SEMS – Step 1 Activities & Outputs**

**TLB SEMS**

1. **JFC also Force Generates**
2. **DE&S also Duty Holds**
3. **Equipment & Services require SEMS interface with Industry**
## Defence Safety & Environmental Management System: Implementation Step 1 – “Plan”

<table>
<thead>
<tr>
<th>Activity</th>
<th>Who &amp; How (Note TLB Holder can also be SDH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Define high level safety policy, Regulation &amp; standards</td>
<td><strong>Defence (via DSA)</strong> to request &amp; influence statute legislation during its development to include Disapplication, Exemptions &amp; Derogations. <strong>Legislative Bodies</strong> to define statute legislation which includes Defence Disapplication, Exemptions &amp; Derogations that have been agreed. <strong>SoFs (via DSA)</strong> to define &amp; issue HS&amp;E policy statement. <strong>SoFs</strong> to agree to enact exemptions when justified by TLBs. <strong>DSA</strong> to provide HS&amp;E policy &amp; guidance via DSA01.1 and 01.2. <strong>DSA</strong> to provide regulation where Disapplication and Exceptions apply and Enforcement may be necessary. <strong>DSA</strong> to provide Design Standards where its is necessary to regulate equipment design and performance. <strong>DSA</strong> to define high level Safety Operating Processes (SOPs) to be used by regulated and regulating community to meet the intent of SoFs HS&amp;E policy and domain specific regulation via DSA01.2, 01.3, 01.4 &amp; Regulations.</td>
</tr>
<tr>
<td>Define Roles &amp; Responsibilities, Organisational structures &amp; delegations</td>
<td><strong>DSA</strong> to define Roles &amp; Responsibilities for safety &amp; set levels of accountability within which TLB holders/SDHs/CEOs can delegate safety roles. <strong>TLB Holders, SDHs &amp; CEOs</strong> to define tailored SEMS requirements and the organisational structures through which safety policies and Regulations are to be met and define posts and individuals who are to be made Accountable and Responsible for executing associated safety duties. <strong>TLB Holders, SDHs &amp; CEOs</strong> to define risk interfaces with other SEMS &amp; organisations for vertical (within TLB) &amp; horizontal (pan TLB) governance.</td>
</tr>
<tr>
<td>Define competencies, approvals &amp; mutual recognition</td>
<td><strong>DSA</strong> to define generic competency levels to hold safety delegations &amp; set any industry approval scheme criteria for Defence equipment &amp; services. <strong>DSA</strong> to agree international standards for mutual recognition with other regulating bodies. <strong>TLB holders, SDHs &amp; CEOs</strong> to define capability or activity specific competencies which are required in addition to generic competencies. <strong>TLB holders, SDHs &amp; CEOs</strong> to distribute generic competencies via ToRs. <strong>Duty Holding &amp; Duty Facing Organisations</strong> to contract with approved industry &amp; utilise mutual recognition, as defined by domain regulation (where applicable).</td>
</tr>
<tr>
<td>Define safety Process, Procedures, Orders &amp; Guidance</td>
<td><strong>TLB holders, SDHs &amp; CEOs</strong> to define the safety processes and procedures required to ensure and assure compliance with DSA policy, regulation and statute legislation within their areas of responsibility. The definition of orders can be delegated as appropriate within the command/management chain. <strong>Commanding Officers &amp; Heads of Establishments</strong> to define orders to ensure compliance with DSA policy, TLB/CEO/SDH defined safety processes and statute legislation. <strong>ODHs and DDHs</strong> to define safety processes, procedures &amp; orders, (including operating envelopes) to ensure compliance with SDH process, regulation and Technical Authority safe operating limits <strong>Duty Holder Facing Accountable Individuals</strong> to issues processes &amp; procedures to meet DSA Regulation, CEO process and ODH processes. <strong>Technical Authorities within Duty Holder Facing Organisations</strong> to define platform specific operating limits, maintenance requirements and the operating procedures required to ensure safety.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Activity</th>
<th>Who &amp; How (Note TLB Holder can also be SDH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Planning Cycles – safety, financial &amp; capability</td>
<td><strong>FMC and HOCs</strong> to define Departmental Capability &amp; Financial planning cycles.</td>
</tr>
<tr>
<td>Governance structure &amp; battle rhythm</td>
<td><strong>DSA</strong> to define Annual Assurance Report cycle to SoFs for safety planning and associated battle-rhythm for Defence Safety Committee, Regulator Group and safety Stakeholder Committees. <strong>TLBs, SDHs and CEOs to define</strong> internal safety meeting drum beat to feed DSC and Perm Sec safety reporting. <strong>SDHs</strong> to comply with Regulation requirements for safety reporting.</td>
</tr>
<tr>
<td>Objectives</td>
<td>TNAs &amp; Training Design</td>
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<tr>
<td>---------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------</td>
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<tr>
<td><strong>DSA, TLB holders, SDHs &amp; CEOs</strong> to agree strategic level objectives for safety performance via Defence Safety Committee (DSC). <strong>TLB holders, SDHs &amp; CEOs</strong> to flow down safety objectives from DSC and define and distribute their own internal safety objectives.</td>
<td><strong>DSA</strong> to conduct TNAs against generic safety competencies as Training Requirements Authority (TRA). Training design agreed by TRA. <strong>TLBs &amp; Duty Holders</strong> conduct TNAs for capability/platform specific training as TRA. Training design agreed by TRA.</td>
</tr>
</tbody>
</table>
### Defence Safety & Environmental Management System: Implementation Step 2 - “Do”

<table>
<thead>
<tr>
<th>Activity</th>
<th>Who &amp; How (Note TLB Holder can also be SDH)</th>
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</tr>
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<tbody>
<tr>
<td>Establish &amp; sustain safety organisations &amp; governance</td>
<td><strong>DSA</strong> to chair Defence Safety Committee &amp; Safety Stakeholder Committees through which to coordinate Defence SEMS, issue policy &amp; Regulation and spread Best Practise. Forums also enable performance reporting against other 3 implementation steps of Defence SEMS and management of Annual Assurance Report “Corrective Action and Safety Improvement Plans”. <strong>TLB Holders, CEOs and SDHs</strong> to establish internal governance arrangements to ensure and assure compliance with safety policy &amp; Regulation and to monitor &amp; manage performance and resolution of enforcement action. Appointment of SQEP to hold safety accountable delegations is required with allocation of appropriate resources required. Risk reporting &amp; escalation process required to enable “risk management and acceptance” within and between TLBs.</td>
<td>Issue Organisational Approvals and Licences</td>
<td><strong>DSA</strong> to assure competencies and issue organisational approvals, as required by Regulation, to MOD and external organisations (within industry and other governments). <strong>DSA</strong> to issue internal MOD licences such as explosive safety.</td>
</tr>
<tr>
<td>Train &amp; Educate workforce</td>
<td><strong>DSA</strong> to define the training objectives to be met for generic safety competencies through career courses and those required and mandated to meet Regulation. <strong>DSA</strong> to assure effectiveness of training and run pan-defence safety awareness campaigns. <strong>DSC</strong> to agree most cost effective delivery for generic safety training &amp; awareness campaigns. <strong>TLB Holders, CEOs and SDHs</strong> to define training objectives for non-generic safety competencies within their Areas of Responsibility and ensure its delivery. Single Service leads to ensure delivery of career training.</td>
<td>Empowered Workforce &amp; Ensure Existence of a Just Culture</td>
<td><strong>DSA</strong> to coordinate pan-defence awareness and education campaign <strong>TLB Holders, SDHs, CEOs and Heads of Establishment</strong> to deliver awareness and education campaign within Areas of Responsibility. Reporting mechanisms and review process to be put in place with feedback mechanism. Publish trends and emerging actions.</td>
</tr>
<tr>
<td>Issue delegations, report on individual &amp; collective performance</td>
<td><strong>DSA</strong> to assure SQEP of nominated individuals when required by Regulation. Report collective performance via Annual Assurance Report to Sofs. <strong>DSC</strong> to agree Measures of Effectiveness for measuring safety performance. <strong>TLB Holders, CEOs, SDHs and ODHs</strong> to assure SQEP of nominated individuals when required by Regulation or policy. Report collective performance within their Areas of Responsibility via in-Year reporting (H2A) to Perm Sec against agreed safety metrics.</td>
<td>Certify Equipment, Maintain Equipment, Manage safety risk to ALARP, Retain records of decision making</td>
<td><strong>Technical Authorities</strong> to deliver equipment to meet agreed standards &amp; identify associated hazards/risks. <strong>Operating Authorities</strong> to define safe operating envelope. <strong>DSA</strong> to assure equipment safety <strong>TLB Holders, SDHs, CEOs and Heads of Establishment</strong> to mitigate and accept safety risks <strong>Operating Units</strong> to follow operating and maintenance instructions within approved operating envelope.</td>
</tr>
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**Figure 5 – Defence SEMS – Step 2 Activities & Outputs**

- **Issue 1.0**
- **Jan 2018**
### Defence Safety & Environmental Management System: Implementation Step 3 - “Check”

<table>
<thead>
<tr>
<th>Activity</th>
<th>Who &amp; How (Note TLB Holder can also be SDH)</th>
<th>Activity</th>
<th>Who &amp; How (Note TLB Holder can also be SDH)</th>
</tr>
</thead>
</table>
| **Conduct assurance**             | **DSA** to undertake 3rd party assurance.  
**TLB Holders, SDH/ODHs and CEOs** to undertake 2nd party assurance.  
**Heads of Establishment, DDHs and Unit COs** to undertake 1st party assurance. | **Take Enforcement Action**       | **DSA** to issue Enforcement Actions iaw DSA01.3 policy and process.  
**TLB Holders, SDHs/ODHs, CEOs, COs and Heads of Establishment** to take corrective action as required by Enforcement Action. |
| **Report & analyse safety performance** | **DSA** to assess and report pan-defence performance against agreed Measures of Effectiveness (MoE) and internal DSA performance against agreed Measures of Performance. Report via Annual Assurance Report to SoS and to Perm Sec via Quarterly Report & H2A. Defined within DSA01.2  
**TLB Holders, SDHs/ODHs and CEOs** to assess and report safety performance within their Areas of Responsibility against MoE defined within DSA01.2 and agreed by DSC. | **Retain records of assurance activity** | **DSA** as required by DSA01.3 policy.  
**TLB Holders, SDHs, ODHs, CEOs, COs and Heads of Establishment** as required by DSA01.2 policy and regulation. Internal TLB & SDH policy for SEMS may require additional record keeping. |
| **Investigate, report & analyse incidents** | **DSA** to investigate accidents and incidents as Convening Authority via DAIB and law Regulation.  
**TLB Holders, SDHs/ODHs and CEOs** to investigate accidents and incidents not investigated by Convening Authority and as directed by accountable individuals. | **Undertake Information Knowledge Management to enable management reviews** | **DSA** as required by DSA01.3 policy.  
**TLB Holders, SDHs, ODHs, CEOs, COs and Heads of Establishment** as required by DSA01.2 policy and regulation. Internal TLB & SDH policy for SEMS may require additional record keeping. |
### Defence Safety & Environmental Management System: Implementation Step 4 - “Act”

<table>
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<tr>
<th>Activity</th>
<th>Who &amp; How (Note TLB Holder can also be SDH)</th>
<th>Activity</th>
<th>Who &amp; How (Note TLB Holder can also be SDH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviews of Hazard Logs &amp; Risk Registers</td>
<td><strong>DSA</strong> to assure process and transfer of risk between Technical Authorities, Operating Authorities and Duty Holders. <strong>TLB Holders, Duty Holders, COS and Heads of Establishment</strong> to manage Risk Registers, with escalation process iaw SEMS. <strong>Technical Authorities and Duty Facing Organisations</strong> to provide Hazard and Risk Log support and input.</td>
<td>Conduct Horizon Scanning of Legislation, future Technology and Capability Equipment Programme</td>
<td><strong>DSA</strong> iaw DSA01.3.</td>
</tr>
<tr>
<td>Review performance reports</td>
<td><strong>DSA</strong> as required to deliver Risk Based Assurance iaw DSA01.3. <strong>TLB Holders and Duty Holders</strong> iaw DSA01.2 and internal SEMS.</td>
<td>Undertake OSAs to assess impact of Change of safety</td>
<td><strong>DSA</strong> to review OSAs against best practise and provide Advice and Guidance. <strong>Change Owners such as TLB Holders, CEOs and SROs</strong> iaw DSA01.2</td>
</tr>
<tr>
<td>Analyse safety information</td>
<td><strong>DSA</strong> as required to deliver Risk Based Assurance iaw DSA01.3. <strong>TLB Holders and Duty Holders</strong> iaw DSA01.2.</td>
<td>Undertake In-Year of funding (as effecting activity &amp; safety)</td>
<td>iaw Central Policy</td>
</tr>
<tr>
<td>Engagement with ITE, ISA, Subject Matter Experts, External Bodies to benchmark</td>
<td><strong>DSA, Duty Holders and Technical Authorities</strong> iaw regulation and policy</td>
<td>Consider SQEP &amp; resilience of workforce</td>
<td><strong>DSA, TLB Holders, Duty Holders, CEOs, COS &amp; Heads of Establishment</strong> - as required by Regulation, Policy and the business and set within the planning cycle.</td>
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</table>

**Figure 7 – Defence SEMS – Step 4 Activities & Outputs**