

# 35 Organisational Change

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## Introduction

1. This chapter shall be read in conjunction with DSA01.2 Chapter 7 – Assessment of Organisational Change on Health, Safety and Environmental Protection. It amplifies that guidance, with specific considerations for managing the occupational health and safety risks within wider organisational change. For the purpose of this chapter:

- a. organisation can mean anything from a TLB, to an establishment or a business area; and
- b. organisational change encompasses any changes affecting the structure or range of duties currently carried out by personnel within that organisation and may include mergers, organisational restructuring, transfers of Defence personnel or changes to staffing levels and alterations to procedures, roles and responsibilities. Even subtle changes to organisations can have a detrimental effect on health and increase the workforce's experience of stress.

2. The motivation for change may come from the top or from bottom up, it may be driven by financial concerns and these may not be connected with safety. However, safety must be regarded as a core component of the business activity and not a side issue. Senior management must demonstrate their commitment to safety by their actions from the very beginning.

3. The management of organisational change requires that a systematic approach is used, both from the perspective of an organisation and from the individual. A key issue is the identification and assessment of the direct and indirect effects of the proposed change and the control of existing and new hazards.

4. Where organisational change occurs at TLB Holder level, an Organisational Safety Assessment (OSA) is to be conducted by a person in a position of authority, with suitable knowledge and competence to conduct such an assessment and should have identified potential risks and required mitigation measures to manage

the proposed change and to ensure that there is no adverse impact to the safe conduct of Defence activities.

5. The OSA should include a clear declaration that there is no detriment to health and safety as a result of the proposed change, as far as could be determined given the work done thus far. The principal means for assessing the potential impact is a comparison of the proposed Organisation and Arrangements (O&A) with those in place prior to the organisational change. The assessment should analyse the effect of the proposed change with the appropriate level of rigour for the period over which the change is to take place and be reviewed at key milestones.

## **Roles and Responsibilities**

### **Commanding Officer (CO) / Head of Establishment (HoE)**

6. Prior to the implementation of change, a review should be undertaken to confirm the existing baseline or establish one and the fitness for purpose of the existing safety management system. A review should be undertaken to determine the potential impact on the existing arrangements for managing safety, and the interim and long-term control measures required to mitigate any potential adverse effects of the proposed change; e.g. organisational structure, staffing levels, staff disposition, roles and responsibilities or any other change that may directly or indirectly affect the control of the hazard. If the change is managed effectively, it should provide assurance to all stakeholders that safety will not be compromised during the transition period or on completion to the new changed state.

7. The CO / HoE is responsible for managing the health and safety risks associated with organisational change. They may delegate the task of managing the implementation of change to a nominated responsible person within the organisation (the seniority of the individual should reflect the complexity of the proposed change, known as the Senior Responsible Officer or Nominated Change Manager) who should have the appropriate authority, relevant competency, direct responsibility for safety issues and understanding of safety implications. The CO / HoE needs to be prepared to change plans if risk assessments show potential risks are emerging.

8. Organisational change should be planned in a thorough, systematic, and realistic way following a documented and structured procedure for each element of organisational change management and whether the change can be phased in over time to prevent change overload. The process of organisational change should at an early stage involve all stakeholders including Service and civilian personnel, contractors, Trade Unions and Representatives of Employee Safety. It needs to be conducted in an open and transparent manner with clear accountability for decisions.

### **Senior Responsible Officer / Nominated Change Manager (SRO / NCM)**

9. The SRO / NCM is responsible for the management of the organisational change process. This role will include co-ordinating and collating all the risk assessments, contingency plans, and hazard operability studies, etc for the area(s) affected by the proposed change in conjunction with the appropriate management and personnel. The SRO / NCM will need to clearly understand what the change will

mean for the area(s) and the personnel. They will need to ensure that any changes made will have no detrimental effect on health and safety. Activities that should be considered:

- a. the maintenance of services, plant and equipment in a safe condition;
- b. the maintenance of a fully functioning health and safety management system;
- c. safe design and plant inspection;
- d. major accident prevention; and
- e. the maintenance of an effective emergency response.

10. A mapping procedure should be conducted for the understanding of tasks and individuals from the old to the new organisation. This should involve personnel and should include:

- a. identification of all personnel in the existing and future organisation who will be affected by the change. This data needs to be accurate and complete. A register should be maintained of all personnel in the organisation with relevant roles (it should also capture contractors);
- b. identify the processes or activities that are carried out (to ensure that risks arising from that change are identified, assessed and reduced to as low as is reasonably practicable);
- c. identify who is accountable and who is responsible for these activities;
- d. identification of the tasks each person carries out including any other tasks secondary to their main daily duties e.g. emergency response; identify the competencies required (any specialist knowledge) or skill that each task or responsibility requires (it is often easy to overlook the loss to the organisation of informal knowledge and processes). Personnel often have important knowledge, skills and relationships that are not recorded, and which can be lost unless specific effort is made to capture them;
- e. whether the current health and safety arrangements for that organisation including remote (home) working are satisfactory and, if not, any shortcomings or lack of resources should be identified so that they are not replicated in the new organisation;
- f. any stress points in the existing organisation. An examination should be made of previous accidents and incidents and maintenance records. Hours of work should also be scrutinised, including records of overtime and individual exemptions from working time regulations; and

g. human factors e.g. training (in relation to health, safety and the environment) and workloads.

11. This procedure becomes more complex in larger organisations where they may be simultaneous changes that may interact with each other, e.g. roles or responsibilities passing from one area to another.

12. The SRO / NCM should compile an Implementation Plan for the appropriate senior officer (the 'Change Owner', e.g. TLB Holder, CO, HoE or Head of Business Area) depending on the level at which the change is being driven. The Implementation Plan should be reviewed at regular intervals. The Implementation Plan should contain the individual action plans and key performance indicators, together with continuity plans to cover those roles with safety responsibilities requiring specific competences and the tasks that personnel in those roles carry out, contractors should also be involved in this process and the processes must be communicated effectively.

13. The SRO / NCM should also co-ordinate the effective and frequent cascade of information between all levels of management and personnel and ensure that feedback of concerns from all levels is supported and encouraged (personnel should be provided with feedback following receipt of their comments).

14. Plans should be made to review the operation of the new organisation which should be timed to take into account any possible delayed effects of the change. Lessons learnt, including strengths and weaknesses, should be identified and used to amend the organisations change procedure.

### **Managers**

15. Managers are responsible for ensuring that risk assessments are reviewed as part of the change process, and that any additional risk assessments identified are completed and the results discussed with the SRO / NCM. Risk assessments, including those for the period of transition should be reviewed regularly (at least once every 6 months until the organisation matures and confidence in the systems and control measures can be validated). Any occupational stress assessments should also be reviewed to identify any areas of concern to personnel e.g. threat of redundancy, outsourcing, move of house, low morale. Managers should encourage feedback from their personnel which should be fed back up to the SRO / NCM.

16. During the change process managers should review activities under their control for any indications of overload on systems or personnel from the change, e.g. near-misses that have resulted from the change, or any delays, backlogs or excessive working hours. Managers should develop a fallback plan if the changes show signs of increasing risks to health and safety. This may require advising the SRO / NCM that certain activities must cease until control systems are put in place to reduce the risks.

17. The operation of the new organisation should be reviewed regularly, this should be timed to take account of any possible delayed effects of the change. All lessons

learnt, including strengths and weaknesses, should be identified and used to amend the organisations change procedure.

18. Personnel should be encouraged to complete any training requirements identified as part of organisational changes and report any safety concerns resulting from the change.

### **All Personnel**

15. It is the responsibility of Defence personnel to follow all information and instruction communicated to them on the process of organisational change.

16. Personnel should raise any concerns with their managers if they feel that workloads from the change may be having an impact on their own or another person's safety. Personnel may also wish to discuss their concerns with workplace Trade Union or Employee Safety Representatives.

### **Retention of Records**

17. All records including the unit / establishment register, risk assessments, etc. should be kept in accordance with JSP 375, Volume 1, Chapter 39 (Retention of Records).

### **Related Documents**

18. The following documents should be consulted in conjunction with this chapter:

- a. JSP 375, Volume1;
  - (1) Chapter 02 - Office & General Workplace Safety;
  - (2) Chapter 07 - Site Transfer or Closure Procedures;
  - (3) Chapter 08 - Health and Safety Risk Assessment;
  - (4) Chapter 17 - Stress; and
  - (5) Chapter 39 - Retention of Records.
- b. Other MOD Publications;
  - (1) DSA01.1 – Defence Policy for Health, Safety and Environmental Protection;
  - (2) DSA01.2 Chapter 1 – Health, Safety and Environmental Protection Requirements for Defence; and
- c. DSA01.2 Chapter 7 – Assessment of Organisational Change on Health, Safety and Environmental Protection.

- d. Legislation and Guidance;
  - (1) [Health and Safety at Work, etc Act](#);
  - (2) [Management of Health and Safety at Work Regulations](#); and
  - (3) HSE guidance on Organisational Change

## **Annex A: Managing Organisation Change**

### **Step 1: Getting Organised**

- Have a strong policy
- Make senior-level managers accountable
- Have a clear change-management procedure
- Communicate and include everyone.

### **Step 2: Risk Assessment**

- Identify the people involved
- Identify all the changes
- Assess the risks
- Consider all the human factors, competence and workload
- Test Scenarios

### **Step 3: Implementing and Monitoring**

- Provide enough resources to make the change safely
- Monitor risks during change
- Keep your plan under review; track changes
- Monitor performance after change
- Review your change policy.