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**ACSO  
3216  
(FIRST REVISE)**



**ARMY**

**ARMY COMMAND STANDING ORDER**

**NO 3216**

**THE ARMY'S SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM**

**ISSUED APRIL 2019**

**Sponsored By:**

**Authorised By:**

**Chief Safety (Army)**

**Deputy Chief of the General Staff**

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## **SAFETY AND ENVIRONMENTAL PROTECTION IN THE ARMY**

### **STATEMENT OF INTENT**

**by the Chief of the General Staff**

The core purpose of the Army is to protect the UK, to defeat the UK's enemies, to deal with disaster and to prevent future conflicts. As the Chief of the General Staff, and the Army's Senior Duty Holder, I have personal responsibility for working, training and operating safely. This responsibility encompasses all of our Officers, Soldiers, Civil Servants, contractors and the General Public. To achieve this, I require you all to support me in this endeavour – looking after our people is my highest priority. This is not new and is enshrined in the Army's Leadership Code and our Values and standards.

You will all know that we have a legal duty to provide the right training for our soldiers and to be an effective force. The British Army is rightly regarded as the best army in the world; this is no small achievement having been developed and maintained by your professionalism in barracks, whilst training and on operations. I attach similar importance to Environmental Protection.

To maintain our reputation, we need hard and challenging training to prepare us for whatever may lie ahead; I regard Safety as a key enabler for this and demand, that it be at the forefront of your planning and delivery outputs. We must never become over confident or complacent. Sadly, the cause of many avoidable incidents can be traced to activity that an individual is not prepared or trained for or is taking place without proper supervision and in the worse cases an example of ill-discipline. None of this is excusable and, whilst individual responsibility remains, I look to the Chain of Command to ensure that these circumstances do not occur.

To do this effectively I require commanders at all levels to apply a Safe System of Training<sup>1</sup>. By doing so, we will achieve the correct balance between challenging training and acceptable risk. It is also vital that we create the opportunity for soldiers to make honest mistakes in training, in pursuit of learning lessons, in a safe environment. Of course, the difference between an honest mistake and negligence must be understood. Our actions move from mere mistakes into negligence when we fail to exercise the care, skill or foresight expected of anyone with our personal training and experience; negligence will not be tolerated. My desired end state is an Army able to demonstrate that we instinctively balance risk and safety in our decision making, underpinned by common sense and an understanding of both corporate (Chain of Command) and individual responsibility, in order to operate safely and mindful of our environmental impact, to maintain our battle-winning tempo and decisiveness.

The Army is a responsible employer, and this means having a strong safety culture. I expect all of you to ensure that when deployed, when training, in your barracks or on the sports field, it is as safe as it can be. There is no space for a reckless or cavalier approach to Safety with the support and guidance contained within this ACSO.

**General Sir Mark Carleton-Smith KCB CBE ADC Gen**

CGS

1 Mar 19

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<sup>1</sup> Safe Person, Safe Equipment, Safe Practice, Safe Place.

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**Introduction**

References:

- A. Secretary of State for Defence Health, Safety and Environment Policy Statement.
- B. DSA 01.1 – Defence Health, Safety and Environmental Protection.
- C. JSP 375 – Management of Health and Safety in Defence.
- D. JSP 418 – Management of Environmental Protection in Defence.
- E. JSP 850 – Infrastructure and Estate Policy.

**Context**

1. The Army is required by UK law and Defence policy (References A – E) to minimise work-related fatalities, injuries, ill-health and adverse effects on the environment from its activity. More than just a legal responsibility, this also enhances the physical and moral components of Fighting Power. Consequently, Safety and Environmental Protection (S&EP) has leadership<sup>2</sup> at its core and all Army personnel, irrespective of rank, have legal responsibilities under the Health and Safety at Work etc. Act 1974 (HASWA) to provide a Duty of Care to subordinates, each other and those who may be affected by their acts or omissions. The Army delivers its Safety commitments in conjunction with Environmental Protection<sup>3</sup>.

2. The Secretary of State for Defence (SoSfD) has ultimate responsibility for Health, Safety and Environmental Protection in Defence and has issued a [Policy Statement](#). He has appointed the Permanent Secretary as the Department's most senior official for Health, Safety and Environmental Protection (HS&EP) and he is required to ensure that effective management arrangements are in place to achieve compliance with SoSfD's Policy Statement. The Permanent Secretary is supported in this duty by the Defence Safety Authority (DSA) who regulate, assure and investigate HS&EP where there is a Departmental responsibility. Additionally, Health and Safety at Work is regulated by the Health and Safety Executive (HSE) and environmental matters are regulated by the Environment Agency (EA) (or equivalents in Scotland, Wales and Northern Ireland).

3. The HSE recommends an approach to safety based on a Plan, Do, Check, Act cycle (as set out in the HSE's HSG 65 document<sup>4</sup>) which achieves a balance between systems and behavioural aspects encouraging the integration of safety management with organisational management generally. The term Safety and Environmental Management System (SEMS) is used by Defence<sup>5</sup> to describe the systematic approach that will be implemented for HS&EP management and the collection of specific arrangements that underpin this implementation. The model is shown graphically below and is the framework for the Army's SEMS.

4. The HSE's Plan, Do, Check, Act model balances the systems and behavioural aspects of Health and Safety leadership and management. It encourages approaching Health and Safety management as an integral part of good management and leadership generally, rather than as a

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<sup>2</sup> Refer to the Army Leadership Code.

<sup>3</sup> It should be noted that the Defence Fire & Rescue (DFR) has the lead for Fire policy pan Defence and the Army's Senior Health Advisor (SHA(A)) has the lead for Occupational Health.

<sup>4</sup> HSE 65 – Managing for health and safety; <http://www.hse.gov.uk/pUbns/priced/hsg65.pdf>.

<sup>5</sup> DSA 01.2

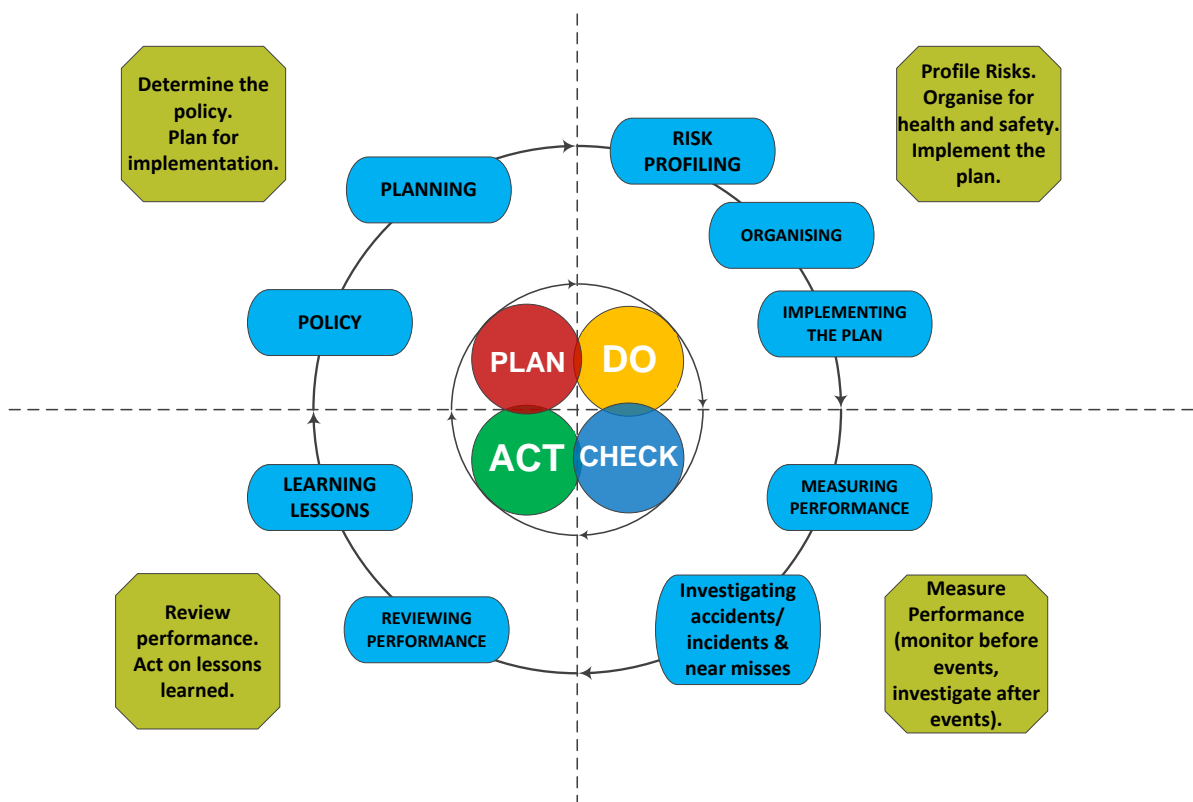
stand-alone system. Widely used as an industry standard, it can be adapted to the full spectrum of Army activity.

5. **Structure.** This ACSO utilises, where appropriate the Defence 2 Part structure:

a. Part 1 - direction (shall; an activity that is mandatory).

b. Part 2 – guidance (should; describes an activity that is considered to be good practice. If the activity is followed, then this will be considered sufficient to demonstrate compliance with this ACSO. However, alternative approaches may be utilised where this produces an outcome as good as required by this ACSO).

### Plan, Do, Check, Act Methodology



### The HSE Model – Plan, Do, Check, Act.

#### Plan

- Identify and communicate what is to be achieved in terms of HS&EP, who will be responsible for what, how aims will be achieved and how success will be measured. Capturing this in a policy and having a plan to deliver it will reduce ambiguity and ensure intent is clear.
- Decide how performance will be measured in the AoR. Consider ways to do this that go beyond looking at accident figures – looking at leading as well as lagging indicators. These are also called [active and reactive indicators](#).
- Consider fire and other emergencies. Co-operate with anyone who shares the workplace and ensure plans are co-ordinated.

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- Plan for changes and identify any specific requirements that apply.

### **Do**

- Identify HS&EP risk profile:
  - Conduct Risk Assessments, identify what could cause harm in the workplace, who it could harm and how, and what needs to be done to manage the risk.
  - Identify what the priorities are and identify the biggest risks.
- Organise activities to deliver HS&EP plans and aims to:
  - Involve all levels in the chain of command and communicate so that everyone is clear on HS&EP intent and their role in your plan.
  - Foster and develop positive attitudes and behaviours – a strong and just Safety Culture is critical.
  - Provide adequate resources, including competent advice where needed.
- Implement the plan:
  - Decide on the preventive and protective measures needed and put them in place.
  - Provide the right tools and equipment to do the job and keep them maintained.
  - Train and instruct, to ensure everyone is competent to carry out their work.
  - Supervise to make sure that arrangements are followed.
  - Demand HS&EP rigour from the chain of command – they are the eyes and ears for Risk Assessment on the ground and must demonstrate leadership in following your intent.

### **Check**

- Measure performance:
  - Make sure that plans have been implemented, 'paperwork' on its own is not a good performance indicator.
  - Assess how well the risks are being controlled and if aims are being achieved. A robust audit regime (iaw ACSO 9001) is strongly recommended.
  - Delivered through Mission Command, this delegation must be mentored and checked resisting the urge to believe comforting assurances about S&EP.
- Investigate the causes of accidents, incidents or near misses:
  - The Defence Accident Investigation Branch (DAIB) will investigate all serious accidents, incidents and near misses.
  - ASCen and APSG may request either an AF510A (Unit Investigation Report) or a Learning Accounts for specific accidents, incidents and near misses.
  - Formations and units are recommended to conduct their own Learning process for HS&EP events that do not meet the DAIB or ASCen/APSG thresholds but from which local lessons can be learned and preventative measures applied.

## **Act**

- Review performance:
  - Learn from accidents and incidents, ill-health data, errors and relevant experience, including from other Organisations.
  - Regularly revisit plans, policy documents and risk assessments to see if they need updating.
  - Encourage and teach Risk Assessment requirements and methods.
- Take action on lessons learned, including those from audit and inspection reports.



## CHAPTER 1

# THE ORGANISATION AND ARRANGEMENTS FOR THE MANAGEMENT OF SAFETY AND ENVIRONMENTAL PROTECTION IN THE ARMY

### Aim

1. This ACSO sets out the SEMS for Safety and Environmental Protection (S&EP) in the Army TLB.

### Compliance

2. Compliance with the Army SEMS will be assured by the Army Inspectorate on a biennial basis or as directed by CGS. However, statutory and Defence Regulators may also consider the effectiveness of this SEMS as part of gathering regulatory evidence. The Army Safety Centre (ASCen) will ensure that these activities are coordinated to avoid duplication.

### Scope

3. Directed by DCGS through ECAB, the SEMS regime creates the conditions to establish a positive S&EP culture throughout the Army ensuring the Chain of Command is not stifled in its ability to empower and delegate by allowing Commanders to manage risk according to context and learn from genuine errors; whilst not accepting recklessness and/or negligence. It is intended to identify risk and share good practice in the interests of continuous improvement. It is about making Mission Command work in peacetime and to 'remove centralisation, over assurance and bureaucracy...[which] stifles the Chain of Command's ability to delegate and empower subordinate levels'<sup>6</sup>.
4. This ACSO maintains this approach and it applies to all Army units and establishments. For those Army units that lie outside the Army TLB, they should subscribe to their parent TLB SEMS. It also applies to S&EP delivered by the Army to other TLBs and has been written to align with the International Organisation for Standardisation (ISO)<sup>7</sup>.

### Plan

5. CGS, as the Army's Senior Duty Holder (SDH), is responsible and accountable to SoSfD for conducting Defence activities in his Area of Responsibility (AoR) safely, environmentally responsibly and compliant with legislation. The Army must implement S&EP management systems that are proportionate to the risks and hazards faced – the greater or more complex the risk, the more sophisticated the system required to manage it. It is essential that the Army has a full understanding of the risks it faces in order that the management of them is sensible, proportionate and conducive to the Army's ethos, culture and requirement to deliver capability. Striking the right balance requires sound judgement and a strong, informed and 'Just' safety culture<sup>8</sup>. The safety of personnel and the protection of the environment are intrinsically linked to the Army's core values, the Army Leadership Code and business objectives.
6. Leaders and commanders must identify the S&EP risks in their AoR and establish safety management systems, processes and governance frameworks to manage them to ALARP and tolerable<sup>9</sup>, ensuring a Safe System of Work/Training is in place. Risk Registers must be produced

<sup>6</sup> [CGS Intent - Army Command Plan 2018](#).

<sup>7</sup> The ISO family of Quality Management System's standards is designed to help organisations meet the needs of customers and other stakeholders and regulatory requirements related to a product eg ISO 45001.

<sup>8</sup> Army Safety Strategy.

<sup>9</sup> ALARP - "as low as reasonably practicable" - Reasonably Practicable involves weighing a risk against the trouble, time and money needed to control it. When these are judged to exceed any further control of the risk, then ALARP and tolerable has been achieved.

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that identify priorities, focus resources, allocate and record Responsibility, Accountability and Authority (RA2) and track risk controls. Subject Matter Expert (SME) advice from various stakeholders will underpin effective safety management and Army S&EP performance, allowing risks to be managed at the appropriate level with agile mechanisms in place for tolerance, treatment, transfer or termination as required.

7. Mechanisms are to be established to measure S&EP performance by analysing leading and lagging indicators, such as (not exhaustive):

a. Leading Indicators:

- (1) The extent to which plans, and objectives have been set and achieved.
- (2) The appointment of staff leads and 'S&EP Champions'.
- (3) Publication of S&EP policies.
- (4) Sufficient trained and experienced personnel in supervisory posts.
- (5) Numbers of S&EP trained staff.
- (6) Number and quality of risk profiles and assessments.
- (7) Number and quality of Organisational Safety Assessments (OSAs)<sup>10</sup>.
- (8) Extent of compliance with risk controls (eg sufficient personnel, induction briefings, etc).
- (9) Extent of compliance with statutory and regulatory requirements.
- (10) Frequency and effectiveness of S&EP assurance activity.
- (11) Frequency and effectiveness of S&EP committee meetings.
- (12) Personal protective equipment usage (eg ear defence).
- (13) Number of Safety and/or Environmental Cases signed off (dual signature).

b. Lagging Indicators:

- (1) Unsafe acts and conditions reported (including near misses).
- (2) Major accident, incidents and fatalities.
- (3) Sickness and injury-related absences.
- (4) Observations made by regulators (eg Enforcement Notifications)
- (5) Observations from assurance activity.
- (6) Observations made by personnel (eg whistleblowing).

8. **Environmental Protection.** Whilst responsibility for a large component of EP sits with the Defence Infrastructure Organisation (DIO) as infrastructure providers and maintainers, the Army

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<sup>10</sup> DSA 01.2 Defence Policy Health, Safety and Environmental Protection - Chapter 7 (Organisational Safety Assessments).

has a responsibility to ensure that its practices and procedures are EP compliant and that any incident is effectively managed. JSP 418 requires an Environmental Management System (EMS) system to be put in place that is based on ISO 14001<sup>11</sup>. A bespoke Environmental Management System for Army Sites (EMSAS) pamphlet has been produced that provides a systematic approach to EP that is to be established at unit level. EMSAS identifies unit activities, which could have an environmental impact and thus enables effective management and regular review. The EMSAS pamphlet is [here](#).

## Do

9. Effective safety management allows the Army to do safely what is required and needs to do in the interests of Defence. S&EP risk management will normally involve several stakeholders and all are to understand their S&EP obligations; identifying, prioritising, managing and controlling the risks they are responsible for. Clear direction and appropriate supervision must be provided to meet those obligations. The Risk Assessment is an essential element of effective risk management by those directing and conducting hazardous activities; it is also a legal requirement.

10. **Safety Governance.** As part of the Army's SEMS all areas of the Army are to have structured and empowered safety governance organisations and arrangements that enable S&EP risks to be managed at the appropriate level. Commanders must set the example in energising safety governance, chairing meetings when appropriate to do so and taking an active leadership role in managing S&EP risks. Formation commanders and staff branch heads are to establish governance mechanisms that actively manage S&EP matters in their AoRs. Army HQ safety governance is at Chapter 2.

11. Safe Systems of Work and Training (SSOW/T) must be identified for all activities, including routine activity. The SSOW/T is explained at Chapter 3 and consists of:

- a. Safe Persons.
- b. Safe Equipment.
- c. Safe Practice.
- d. Safe Place.

12. The Army has a legal and moral Duty of Care obligation for the health, safety and welfare of its personnel and those who might be affected by its acts or omissions. This obligation is universal (applied to all activities) and responsibility is vested in every individual from recruit to CGS. However, more is expected of commanders (from LCpl upwards) who direct and supervise activity to manage the risks they create and/or are confronted by. This is done by understanding the risks, making a judgement on whether the risk (potential adverse outcome) is worth the potential benefit and putting controls in place to reduce the risks to As Low As Reasonably Practicable (ALARP) and tolerable. The SSOW/T is a useful framework and will, in most cases, reduce risk to ALARP and tolerable ensuring Duty of Care obligations are being met.

13. Where the risks are significant, but the activity must be conducted in the interests of Defence (ie live firing, flying, arduous physical training, etc.) CGS may direct that in order to meet Duty of Care obligations the Duty Holding process is followed to add focus and emphasis to safety risk management and an improved gearing for risk elevation. This Duty Holding framework will clearly identify those with RA2 for the management of safety risk when conducting the prescribed activities

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<sup>11</sup> ISO 14001:2015 sets out the criteria for an environmental management system; such a system can be certified to this standard. This ISO maps out a framework that a company or organisation can follow to set up an effective environmental management system. It can be used by any organisation regardless of its activity or sector.

and provide a mechanism for its effective resourcing and elevation of ownership when required. In accordance with Defence Duty Holding policy, there will be three levels of Duty Holder:

a. **Senior Duty Holder (SDH).** This will always be CGS and is the level at which ultimate RA2 is held. The SDH will direct which activities are subject to Duty Holding and the standards that are to be applied. Safety risk may be elevated from the Operating Duty Holder (ODH) to the SDH as required; in some instances, significant risks may need to be held by the SDH, in others, the SDH may elevate the risk to SoSfD.

b. **Operating Duty Holder (ODH).** This is the level at which CGS's intent and direction is applied within AoRs. It is normally vested at the 2\* level and appointed by the SDH. The ODH provides the safety management link between the SDH and those routinely conducting the activity at the Delivery level. The ODH will conduct 2<sup>nd</sup> Line of Defence assurance to ensure compliance with CGS' intent and direction, set standards and may direct resources to mitigate safety risk as required. Risk ownership may be elevated from the Delivery Duty Holder (DDH) to the ODH as required and the ODH may elevate risk to the SDH. ODHs will be expected to provide an annual report to the SDH on how Duty Holding safety risks are being managed and controlled in their AoR.

c. **Delivery Duty Holder (DDH).** This is the level at which CGS' intent and the safety standards to be applied are delivered by the appointed DDH; this is normally Commanding Officers (CO) or in some cases independent sub-unit commanders<sup>12</sup>.

d. Below the DDH, commanders at all levels are to ensure that a SSOW/T is in place for all activity. As directed by the DDH, additional scrutiny and control are likely to be applied to those activities prescribed for Duty Holding and 1<sup>st</sup> Line of Defence assurance should be focused accordingly in meeting CGS' intent. Commanders must maintain a SSOW/T. Where this cannot be maintained, but the activity must continue in order to accrue benefit, consultation with the DDH is required and the safety risk may be elevated if necessary.

14. The ASC and ASSC will provide the forums at which the activities requiring Duty Holding are identified, confirmed and monitored. Commanders and SMEs can offer opinion to either committee on the requirement for Duty Holding. Full details of the Army Duty Holding policy are at Chapter 6 and a DH training course is available on the [DLE Code 101](#). Duty Holding training is valid for 3 years and must be refreshed if Duty Holding responsibilities endure beyond that time.

15. **Safety Responsibilities/Organisation.** The following personnel have key roles in S&EP management.

a. **CGS.** CGS sets the standard for Army S&EP and is ultimately responsible for the Safety of all Army TLB personnel. They are supported in this role by the Chain of Command and the Executive Committee of the Army Board, which is briefed quarterly by the Army Inspector on the Army's S&EP performance. CGS chairs the Army TLB senior safety forum, the annual ASC, which considers Army S&EP risk management and performance, refines policy and sets safety objectives and priorities.

b. **DCGS.** DCGS is the Army's 'Safety Champion'. He chairs the biannual ASSC, which monitors Army S&EP risk management and ensures CGS's direction and guidance is being applied. He represents the Army on the tri-annual Defence Safety Committee (DSC).

c. **Army Inspector.** The Army Inspector ensures appropriate 3<sup>rd</sup> Line of Defence assurance and regulation for all Army activity across Defence and ensures the Army's

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<sup>12</sup> Specific arrangements are to be agreed and applied in the Collective Training Environment - see Ch 6.

activities are appropriately compliant with statutory and regulatory requirements. He ensures the Army is demonstrably rigorous and effective in self-regulation<sup>13</sup>.

d. **Commander Home Command (Comd HC) and Commander Field Army (CFA).**

Comd HC and CFA set the standards for S&EP in their respective AoRs chairing S&EP committees as necessary. They ensure CGS' direction and priorities are followed and that robust management mechanisms are in place for the management of S&EP risk. They are to promote an appropriate safety culture and ensure that all subordinate commanders understand their intent regarding S&EP risk management. They are to ensure effective procedures for the management of S&EP within their commands through an appropriate action plan including the identification of safety lessons to facilitate learning from experience, sharing that learning when it applies beyond their AoR.

e. **Army Safety Centre.** The Army Safety Centre's mission is to 'To protect the Army's people – soldiers and civilians – and environment in order to meet operational outputs'. The responsibilities of the principal staff officers are:

(1) **Chief Safety (Army) (CS(A)).** The Chief Safety (Army) is the Army's S&EP Subject Matter Expert (SME) and works directly to DCGS. He commands the Army Safety Centre (AScen) delivering the Army's Organisation and Arrangements for S&EP within ACSO 3216 – The Army's SEMS. He advises staff branches and the chain of command on S&EP issues and is the Army's link and lessons processes. He communicates key S&EP messages throughout the year, including a biannual magazine, guides and DVDs.

(2) **Deputy Chief Safety (Army)(DCS(A)).** The Deputy Chief Safety (Army) is the Chief of Staff of the AScen. They are also responsible for the management and direction of the Army Force Protection Advisers (AFPAs) and deputising for CS(A) as directed.

(3) **Command Environment and Safety Officer (Army) (CESO(A)).** CESO(A) maintains the Army's Organisation and Arrangements for S&EP within ACSO 3216 – The Army's SEMS. He conducts 2<sup>nd</sup> Line of Defence assurance in accordance with ACSO 9001<sup>14</sup> and sub-ACSO 9016<sup>15</sup> and routinely monitors S&EP performance for trends and weak signals. He produces an Annual Assurance Review on S&EP.

(4) **Army Force Protection Advisers (AFPA).** The Army Force Protection Advisers are a cadre of S&EP professionals who operate across the Army TLB to provide advice and guidance to units. They have a limited S&EP training capability and are able to act as incident investigators when directed by AScen.

f. **Army HQ 2\* Directorates.** 2\* Directors have RA2 for safety-related activity and policy in their respective areas which are aligned to their function in the AOM. They are to familiarise themselves with their responsibilities, authorities and accountabilities and ensure a suitable and sufficient governance framework exists to meet those obligations. This will include, but is not limited to: capability safety (including Part 3 Safety Case dual signature<sup>16</sup>), attendance at safety-related meetings and committees (eg Safety and Environmental Management Panels (SEMPs), Safety and Environmental Management committee (SEMCs) etc.), defining safe practice and procedures (eg Pamphlet 21 for Live Fire Training), Equipment safety including engineering policy, Army Competent Advisors and Inspectorate (ACAI) responsibilities, providing subject matter expert advice to the chain of command and

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<sup>13</sup> Army Insp SO1 H&S is to review this ACSO for regulatory compliance annually.

<sup>14</sup> [9001 Link.](#)

<sup>15</sup> [9016 Link.](#)

<sup>16</sup> Noting that Air System Safety Cases are controlled separately by the MAA.

Duty Holders, highlighting infrastructure safety risks (including fire and fuel and gas installations) and the means to control such risks.

g. **Director Personnel (D Pers).** D Pers is responsible for the Senior Health Adviser (Army) (SHA(A)) including the Environmental Health Adviser (Army) within Army HQ. Their responsibilities are:

(1) **Senior Health Adviser (Army) (SHA(A)).** Is responsible for Medical policy across the full spectrum of military activity, including: health, dental, occupational health and environmental health.

(2) **SO1 Environmental Health Policy (Army) (SO1 EH Pol (A)).** Is responsible for the co-ordination, provision and assurance of Environmental Health (EH) delivery including food and water safety, infectious disease control, occupational hygiene, pest management and housing fitness across the Army TLB. Details are contained within [ACSO 9017 – Force Health Protection Audit \(FHPA\)](#).

(3) **Director Army Legal Services (DALs).** DALs is responsible for Legal policy and advice in relation to legal regulation and compliance across the full spectrum of military activity.

h. **Director Capability (D Cap).** D Cap is both an 'Operating Duty Holder' as well as 'Duty Holder Facing'. They are responsible for all Land Equipment Safety Cases through the Land Equipment Safety Officer (LESO) as well as the 2\* Comd for all Trials and Development Units (TDUs). They are to:

(1) Provide direction on safe usage of equipment.

(2) Own, maintain and co-sign Part 3 of allocated Safety and /or Environmental Case Reports<sup>17</sup>.

(3) Act as a single point of contact for capability safety advice to 3\* Comds/Duty Holders.

(4) Develop and maintain an equipment safety focal point.

(5) Acknowledge, on behalf of the Army, risks that are transferred from Defence Equipment and Support (DE&S) through the risk referral process.

(6) Chairs (through Assistant Head Tech Safety) the Land Systems Capability Working Group (LSCWG).

(7) **Land Equipment Safety Officer (LESO).** Is D Cap's principal safety officer.

i. **Director Support (D Sp).** D Sp is 'Duty Holder Facing' and the lead for all in-service equipment and logistics. Responsibilities rest with:

(1) **Head Equipment (Hd Eqpt).**

(a) **Assistant Head Technical Land System (AHTLS).** AHTLS provides technical advice on in-service platforms and equipment, specifically for SEMP.

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<sup>17</sup> Whilst D Cap has the overall ownership of the Safety Cases, maintenance and co-signing is delegated to the appropriate HoCs where appropriate and that anyone holding safety responsibilities should be demonstrably competent to do so.

(b) **Chief Engineer (Army) (CE(A))**. CE(A) provides the Army's engineering safety focus. He is the principal advisor to stakeholders on in-service technical engineering and maintenance issues and equipment safety matters. He chairs the Land Systems Engineering Committee (formerly known as the Army Engineering Committee).

(2) **Head Logistics (Hd Log)**. Is responsible for Fuel and Gas, Movement and Transport, and Logistic Support through his staff officers. In particular;

(a) **Chief Ammunition Technical Officer (CATO)**. *To follow.*

(b) **Inspector Explosives (Army) (IA(A))**. *To follow.*

(3) **Assistant Head Defence Explosive Ordnance Disposal Supervisor (AH DEODS)**. AH DEODS provides the Safety focus for Army EOD & Search (EOD&S) which includes EOD Electronic Counter Measures (ECM), Chemical, Biological, Radiation and Nuclear (CBRN) EOD and explosive safety of Weapons Technical Intelligence (WTI). In particular;

(a) AH DEODS is the (EOD&S) SME Advisor to stakeholders for new and in-service EOD&S equipment, providing support to DE&S in development of associated Safety and/or Environmental Cases.

(b) AH DEODS is represented at the Safety and Environmental Working Groups (SEWG) and signs Part 3 of the Safety and/or Environmental Case for EOD&S equipment.

(c) AH DEODS is also the Competent Defence Advisor (CDA) and ACA&I for EOD&S.

j. **Director Information (D Info)**. D Info has 'Duty Holder Facing' responsibilities and is the lead for Land Information Systems. His responsibilities are as for D Cap but pertain to the Information AoR only. His responsibilities include:

(1) Ownership of Equipment Safety Management across D Info.

(2) Ownership of Risk Management at 2\*.

His principle Safety Officer is HoC C4ISTAR<sup>18</sup> who is responsible for:

(1) D Info sponsored Safety and/or Environmental Case sign off and management across C4ISTAR systems and services.

(2) Delivery of equipment safety management within C4ISTAR.

(3) Acts as D Info's Army Competent Advisor and Inspectorate (ACAI).

(4) Lead on equipment safety advice to Heads and Desk Officer's through ACA.

(5) Directs 2<sup>nd</sup> Line Assurance across C4ISTAR.

k. **Director Basing and Infrastructure (D B&I)**. D B&I is 'Duty Holder Facing' with responsibilities as for D Cap but pertaining to the Basing and Infrastructure AOR. He is

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<sup>18</sup> Command, Control, Communications, Computers, Information, Surveillance, Target Acquisition and Reconnaissance.

responsible for ensuring that DIO delivers its obligations for the provision of a safe, compliant and fit for purpose Estate including the safe place to live, work and train. His principle safety officer is **Head Infrastructure Plans (Hd Infra Plans)** who is responsible for:

(1) *To follow.*

l. **Directorate Children and Young People (DCYP).** The directorate of Children and Young People responsible for the care and education of service personnel's children and young people including MOD Schools and welfare provision. DCYP are part of Home Command.

m. **1\* and 2\* Commanders**<sup>19</sup>. Commanders have a key role in ensuring an appropriate safety culture exists and setting the standard for S&EP in their AoR. They are to ensure that subordinate commanders understand their S&EP risk management intent and ensuring that CGS's and other superior commanders' intent, direction and priorities are followed. They are to ensure effective procedures for the management and governance of S&EP within their commands through an appropriate action plan including the identification of safety lessons to facilitate learning from experience, sharing that learning when it applies beyond their AoR. 2\* commanders are ODHs and 1\* commanders have oversight responsibilities for their DDHs for specified activities and are to conduct 2<sup>nd</sup> Line of Defence S&EP assurance activity. Commanders are supported in their S&EP roles by SMEs and are normally established for S&EP qualified Force Protection and EP staff that can provide specialist advice. Where these do not exist, Commanders are advised to nominate a focal point and a senior officer as a S&EP proponent – a 'Safety Champion'. Force Protection staff must read and understand HSE guidance ([HSE65 PDF: Managing for Health and Safety](#)) whilst commanders and Command Group/Board members should be familiar with the key principles.

n. **Head of Establishment (HoE).** HOEs are to ensure that they have suitable Organisation and Arrangements in place to cover all their responsibilities in accordance with [ACSO 1105 - Head of Establishment Responsibilities](#).

o. **Unit Commanders.** As those closest to the conduct of hazardous activity, unit commanders have a key role to play in Army S&EP. They set the standards for S&EP in their respective units and must ensure their superior's direction and priorities are followed. They are to establish effective systems and governance for the management of S&EP risks, ensure an appropriate safety culture exists and that all subordinates understand their intent ensuring that all personnel, who have safety related responsibilities, have clear Terms of Reference (TORs). Unit Commanders are to conduct 1<sup>st</sup> Line of Defence assurance of their unit and are advised to conduct spot checks of Risk Assessments and other S&EP documentation in order to ensure standards are maintained. All units must appoint an officer to lead on S&EP management and are advised to appoint a senior officer (eg 2IC / QM) as a S&EP proponent – a 'Safety Champion'.

p. **Officers and NCOs.** This is the most important level as it is where risk is most apparent and intervention most critical. Good S&EP performance is achieved by commanders at all levels, but particularly at the junior levels, understanding their Duty of Care obligations for managing risk for those employed under their command (and others affected by acts and omissions). This is particularly important if and when the situation changes and requires a dynamic review of the Risk Assessment. Junior commanders must be trained for their respective roles and understand how those roles are to be conducted safely. They have a duty to stop or pause activity if they feel it has become dangerous and is no longer controlled to the correct standard; this is particularly pertinent when a situation has

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<sup>19</sup> Including Comd JHC.



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changed or a 'last minute good idea' becomes apparent. Whilst initiative and innovation are encouraged, due consideration must be given to the risks to personnel and the environment.

16. **Organisation.** The Organisation of Army's Safety arrangements are shown at:
- a. Annex A – Level 1: Army (Land) Safety and Environmental Protection Organisation.
  - b. Annex B – Level 2.1: Army Corporate Safety and Environmental Protection Governance Schematic.
  - c. Annex C – Level 2.2: Army Corporate Safety and Environmental Protection Governance (Home Command Organisation).
  - d. Annex D – Level 2.3: Army Corporate Safety and Environmental Protection Governance (Field Army Organisation).

17. **Safety Responsibilities/Arrangements.** The table below sets out S&EP governance responsibilities:

Ser	Task	Conducted By
1	<b>Create a Just Safety Culture.</b> A strong S&EP culture is at the heart of safety performance. Setting standards, demonstrating S&EP leadership, recognising and rewarding good behaviour and taking appropriate action against reckless behaviour or deliberate non-compliance, combine to ensure the right culture is achieved.	<b>Fmn, Unit, HoE and all Comds</b>
2	<b>Appoint a Safety Champion to the Command Board.</b> COS/DCOS/2IC, or an officer of similar status, is to be appointed the Command Board's S&EP Champion.	<b>Fmn, Unit, HoE</b>
3	<b>Publish signed and dated S&amp;EP Organisation and Arrangements Policy.</b> Unit O&A policy must include the following: <ul style="list-style-type: none"> <li>a. Reference to the extant Secretary of State for Defence's Policy Statement and CGS's Policy Statement.</li> <li>b. A reflection of the personal commitment of the Comd/CO to S&amp;EP.</li> <li>c. Demanding the personal commitment to S&amp;EP of the subordinate command chain.</li> <li>d. The requirement for the prevention of harm, injury, loss and ill health that are based on the systematic identification of health and safety/fire hazards through detailed risk assessment.</li> <li>e. Creation of S&amp;EP Action Plan (to cascade from 3* to unit level).</li> <li>f. Confirm EMS (preferably EMSAS) is in-place and up to date.</li> <li>g. The arrangements for providing Coordination, Cooperation, Communication and Control (4Cs) for lodger units, contractors and visitors in accordance with</li> </ul>	<b>Fmn, Unit, HoE</b>

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Ser	Task	Conducted By
	<p><a href="#">JSP 375 Part 2, Vol 1, Chap 34</a>. For lodger units, this is to be underpinned by a signed Memorandum of Understanding.</p> <p>h. The arrangements for the investigation of accidents and near misses in order to provide a mechanism to identify and learn lessons to ensure the prevention of recurrence.</p>	
4	<p><b>MS Recognition.</b> Ensure that subordinate commanders' job specifications set out S&amp;EP responsibilities and ensure, where possible, that annual appraisal reports reflect S&amp;EP leadership and management.</p>	Fmn, Unit, Sub Unit
5	<p><b>Establish a Safety Committee.</b> Ensure that the S&amp;EP committee meets on a regular basis and is chaired by the Commander/S&amp;EP Champion (at least once per year).</p> <p>The SHE Action Plan should be a standing agenda item at these meetings.</p>	Fmn, Unit, Sub Unit, HoE
6	<p><b>Safety Performance Measurement and Review.</b> Ensure that safety performance measurement occurs and that it is reviewed in detail by Safety Committees.</p>	CS(A), Fmn, Unit, HoE
7	<p><b>Reporting.</b> Encourage a reporting culture and ensure that all adverse events, including near misses, are reported to the Army Incident Notification Cell (AINC) in accordance with Chapter 10.</p>	Fmn, Unit, HoE
8	<p><b>Appoint an Army Force Protection Adviser (AFPA).</b> Chief Safety (Army) will appoint an AFPA where appropriate to advise units on their S&amp;EP, conduct investigations (as directed by ASCen) and conduct S&amp;EP training where appropriate. They are to maintain effective communications with their higher formation on S&amp;EP issues.</p>	CS(A)
9	<p><b>Appoint a Unit Safety Advisor (USA).</b> Each unit must appoint a Unit Safety Advisor to take the lead on S&amp;EP management. The nominated person must be trained on the All Arms Unit Safety Advisor Course or equivalent<sup>20</sup>.</p>	Unit
10	<p><b>Consultation.</b> Ensure that their personnel, whether military or civilian, are consulted on Safety issues possibly through Site Safety Meetings.</p>	Fmn, Unit, HoE
11	<p><b>Operate Safely.</b> Operate within the Safe System of Work (SSOW)/Safe System of Training (SSOT) whenever possible (Chapter 3). When not possible, treat (suitable controls to achieve a 'safe system'), transfer (elevate) or terminate (cease) the risk. Always ensure supervision is in place and that dynamic risk assessments are conducted if the situation changes.</p>	All

18. **Overseas Locations.** In addition to the responsibilities set out above, commanders in overseas locations, including Defence Attaches are, so far as is reasonably practicable, to publish

<sup>20</sup> This includes the Safety Advisors Course held at the REME Arms School.

a command level S&EP O&A policy that draws together UK and Host Nation requirements for compliance by all employees of the command, irrespective of their parent TLB or budgetary status.

19. All military personnel, civilian employees, contractors and visitors are to take reasonable care of their own safety and that of others who may be affected by their acts or omissions at work. All accidents, near misses, serious equipment failures or unsafe practices are to be reported in accordance with Chapter 10.

20. **Competence and Qualifications.** Competence is a vital element of Safety. It is achieved by ensuring that all personnel, commensurate with the task, are qualified, experienced and current, and that they are appropriately supervised. The Training Requirements Authority (TRA) sets the standard for Special-to-Arm and equipment specific training. This is assured and monitored by the appropriate ACA&I who have the overall responsibility for setting the safe standards by which capability is provided. The specific S&EP training that is to be carried out is at Annex E. For all other Safety and Environmental Protection training requirements, units must comply with the requirements of the [Compendium of Mandated Course Trained Personnel](#).

21. **Other Services.** RAF and RN personnel under OPCOM, OPCON or ADCON will conform to their Single Service training standards. The chain of command is to be notified if any deficiencies are identified or if other Service standards conflict or are at odds with those of the Army. The matter can be referred to Chief Safety (Army) if necessary.

22. **Communication and Collaborative Effort.** Good Safety Management relies on mechanisms being established to facilitate regular consultation and cooperation on Safety issues. Chains of Command are to ensure such forums exist at levels commensurate with the level of risk. Views from the 'coal face' and from SMEs are vital to ensuring that maximum benefit is derived from such meetings, which must be chaired by commanders (IC, OC, CO, HoE, Comdt, Comd, etc.). Where occupancy and/or activity is shared, such as with Cadets, other units, contractors, etc, the other user(s) must attend the safety meetings; the '4Cs' principle<sup>21</sup> (applies and Risk Assessments must account for all user groups. Mechanisms for anonymous reporting of Safety concerns are encouraged to ensure that potentially contentious issues can be raised without fear of sanction. In addition to programmed Safety meetings, 'extraordinary' Safety meetings are encouraged prior to and after a major event, such as an exercise or complex road move, in order to ensure that risks are/were identified and effectively managed and lessons learnt and communicated effectively. In addition to dedicated Safety meetings, Command Groups, Committees and Management Boards are recommended to have Safety as a standing agenda item to ensure that key Safety issues are brought to the attention of commanders.

23. Routine Safety messaging from Army HQ will be coordinated by SO2 Communications, ASCen, who will ensure the following:

- a. A Safety link is maintained and updated on the Army website.
- b. Key issues are highlighted in the ASCen 'Safety and Environment Matters' magazine and quarterly newsletter.
- c. DSA/ASCen Safety Notices<sup>22</sup> are promulgated through the CoC.

## Check

24. **Assurance, Audit and Inspection.** ACSO 9001 details the Army's Policy for Audit and Inspection (A&I). It situates A&I in the context of the Army Corporate Governance Assurance Operating Model, whilst describing the new assurance taxonomy and the division between 1st,

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<sup>21</sup> [JSP 375, Pt 2, Vol 1, Ch 34](#).

<sup>22</sup> Army Safety Notices are promulgated through Safety Notices via Email (SNvE).

2nd, 3rd and 4th Lines of Defence assurance. The ACSO 9001 model allows commanders to manage risk according to context and learn from genuine errors, whilst not accepting negligence or recklessness. CS(A) retains an assurance and audit capability and remains the proponent and ACAI for S&EP and Fire. As such, CS(A) will set appropriate standards for the Army to which it must operate and against which internal control measures will report. CS(A) is responsible to CGS, through the Army Inspector, for tracking the extent to which the chain of command is complying with the policy set out in ACSO 9016.

25. The ASCen will make recommendations on the most effective and efficient internal control measures required to provide the necessary level of assurance to the chain of command. It will also continue to monitor and analyse S&EP performance remotely using MIS thereby identifying triggers that would prompt an S&EP audit of a unit or formation. These are published in [ACSO 9016](#).

26. **Organisational Change.** Organisational change must not be detrimental to safety. In accordance with DSA 01.1 - Chapter 4 an OSA must be undertaken when major Organisational change is being considered. This involves base lining the present safety arrangements/procedures and verifying that the proposed Organisational change does not undermine safety. Army TLB OSAs are directed and recorded by Director Strategy as the Army SRO for organisational change. More guidance is published in DSA 01.2 Chapter 7.

27. **Accident Investigation.** Responsibility for investigating all MOD fatalities and some serious accidents and incidents falls to the DAIB. Upon notification of an accident or an incident involving Army personnel, the DAIB will liaise with the Army Personnel Support Group (APSG) to discuss if the event meets the DAIB threshold for investigation and possible Service Inquiry. If it does, the DAIB will conduct the investigation and pass safety recommendations to the ASCen<sup>23</sup> for input onto the Defence Lessons Information Management System (DLIMS). Irrespective of any DAIB investigation, APSG will always ask affected units for a Learning Account and may conduct their own Non-Statutory Inquiry (NSI) into the event. Lessons are then tracked through the quarterly Safety, Personnel, Health Integration Working Group (SPHIWG), which is attended by ASCen, APSG, SHA(A), Land Warfare Centre and the Army Inspectorate.

28. **Environmental Protection.** A site/unit EMS (or preferably EMSAS) must be reviewed annually and signed off by the HoE and/or CO.

## Act

29. **Learning Lessons.** The Army must be able to demonstrate that it is a learning Organisation. The process by which safety lessons are tracked, managed and closed is conducted in accordance with [ACSO 1118](#) and led by SO1 Safety Lessons and Investigations, ASCen. It is vital that S&EP lessons are also learnt at the lowest levels, particularly from near misses that often precipitate more serious accidents.

30. **External Enforcement.** The Army is subject to the HSAWA and the Corporate Manslaughter and Corporate Homicide Act 2007 – although certain exemptions are in place. However, the HSE has in general undertaken not to pursue individuals for prosecution when failings have occurred in the course of a duty but will seek to prosecute the MOD under the concept of vicarious liability. The HSE will issue a Crown Censure to the MOD where it can demonstrate that a similar failing by a corporate body would have likely resulted in a successful prosecution. CGS, or his nominated representative, will attend the Crown Censure and be supported by Chief Safety (Army). In extremis, where individuals are considered to have acted negligently, they may be liable to prosecution.

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<sup>23</sup> SO1 Safety Lessons and Investigations.

31. **Internal Enforcement - Defence Regulators.** Defence Regulators, working on behalf of DG DSA, regulate areas of Defence that have Disapplication, Exemption or Derogation (DEDs) from civil legislation. They have enforcement powers, but do not have powers of prosecution. Further details are in DSA 01.1 Chapter 7.

### **Coherence with other Army Policies and Guidance**

32. Where applicable, this document contains links to other relevant ACSOs, some of which may be published by different staff branches including legal and professional enforcement ie Service Discipline (AFA 06). Where dependencies exist, these other staff branches have been consulted in the formulation of the policy and guidance detailed in this publication.

### **Engagement with another MOD TLB**

33. There are numerous occasions when the Army TLB is required to engage with RN, RAF, JFC etc. The principal officer authorised to directly liaise with these other TLBs including the DSA, is the CS(A); less for DES when this responsibility falls to the LESO. CS(A) may delegate this responsibility across the ASCen to ensure continuity and coherence of engagement. In the case of the Defence Safety Committee, the principal Army representative is DCGS.

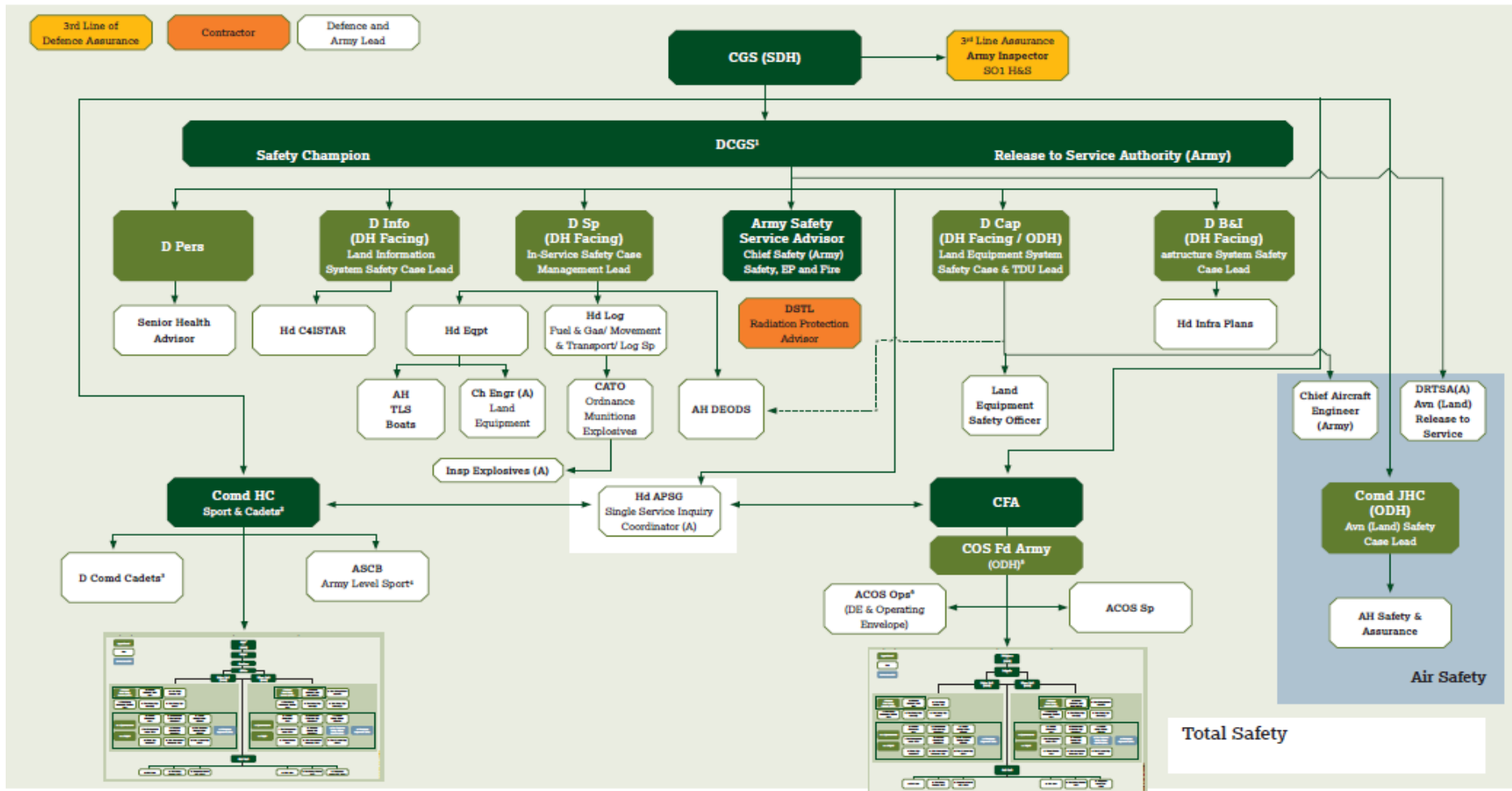
Annexes to Chapter 1:

- A. Level 1: Army (Land) Safety and Environmental Protection Organisation.
- B. Level 2.1: Army Corporate Safety and Environmental Protection Governance Schematic.
- C. Level 2.2: Army Corporate Safety and Environmental Protection Governance (Home Command Organisation).
- D. Level 2.3: Army Corporate Safety and Environmental Protection Governance (Field Army Organisation).
- E. Safety and Environmental Protection Training Requirements.

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ARMY (LAND) SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM



1. DCOB is ODH for RMP Special Operations Regt, Military Corrective Training Centre and the Military Provost Guard Service.
2. GOC Regional Command is ODH for Cadets.
3. D Comd Cadets commands the Army Cadet Force and the Combined Cadet Force.
4. Unit level sport safety is delivered via the Chain of Command under Duty of Care.
5. COS Fd Army is ODH for 16 AA Bde.
6. ACOS Ops, supported by CBO(A), is responsible for setting the operating envelope for those deployed on operations and Defence Engagement. The delivery mechanism is the FGenO.



ARMY (LAND) TOTAL SAFETY GOVERNANCE (AC(A))

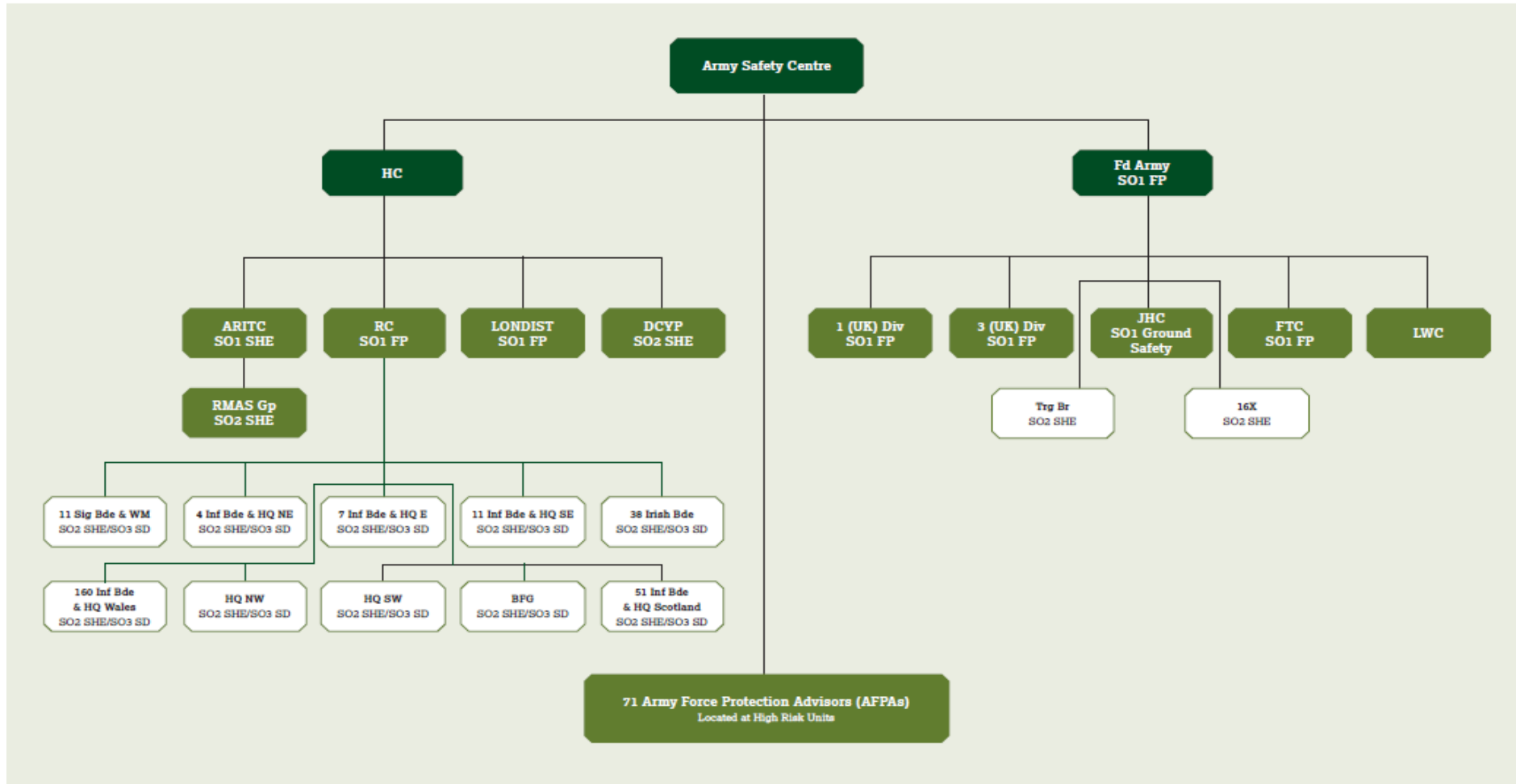
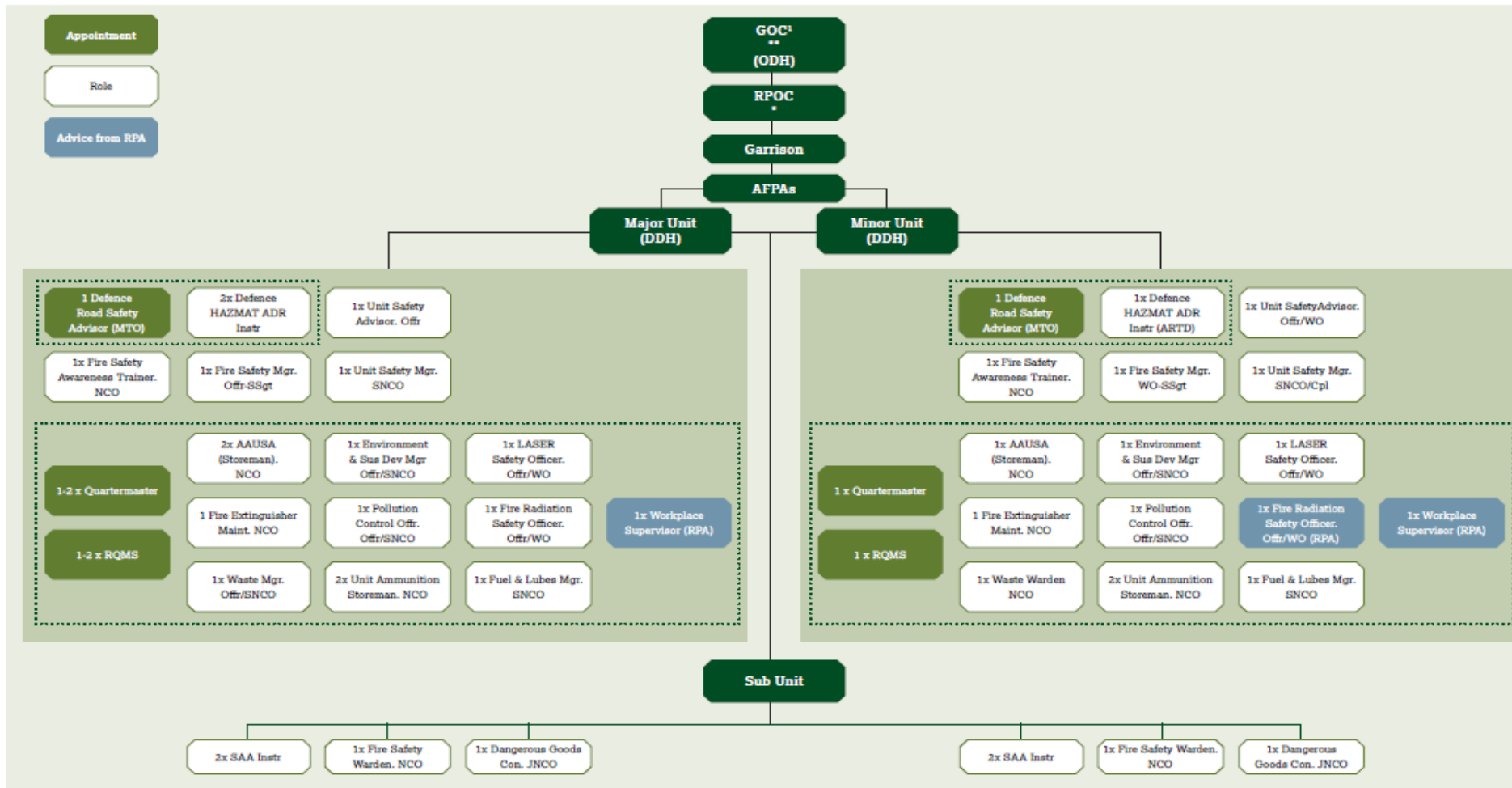


Figure 2. Army (Land) Total Safety Governance (AC(A))





**LEVEL 2.2.2 - ARMY CORPORATE GOVERNANCE ASSURANCE OPERATING MODEL:  
ARMY (LAND) SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM (HOME COMMAND ORGANISATION)**

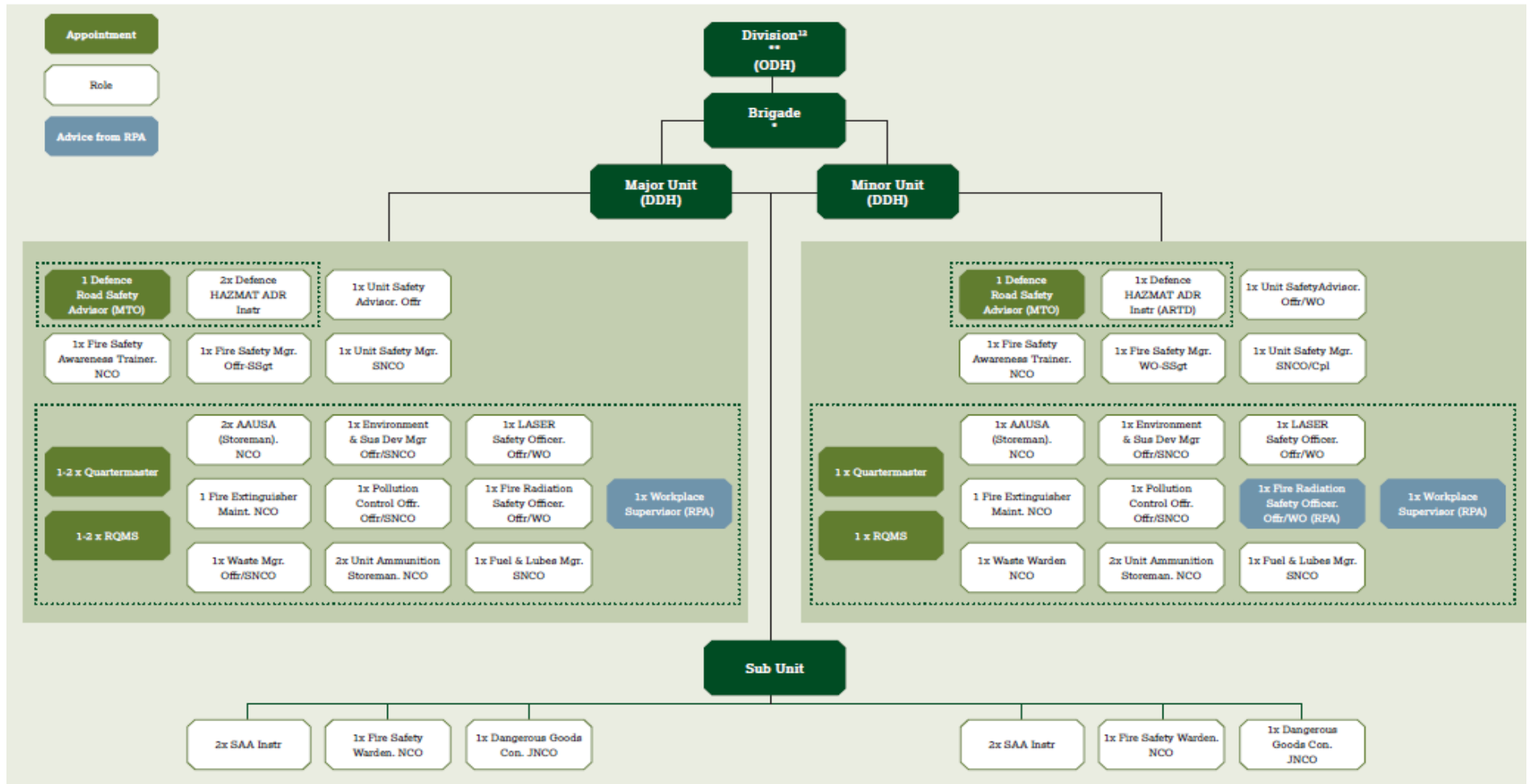


1. GOC Regional Command is ODH for Cadets and Parachute Display Teams.

Figure 3. Army (Land) Total Safety Governance (Home Command)



**LEVEL 2.2.3 - ARMY CORPORATE GOVERNANCE ASSURANCE OPERATING MODEL:  
ARMY (LAND) SAFETY & ENVIRONMENTAL MANAGEMENT SYSTEM (FIELD ARMY ORGANISATION)**



1. Director Land Warfare is ODH for Collective Training Establishments.  
 2. COS Fd Army is ODH for 16 AA Bde.

Figure 4. Army (Land) Total Safety Governance (Fd Army)



**SAFETY AND ENVIRONMENTAL PROTECTION TRAINING REQUIREMENTS**

Ser	Organisation	Training Requirement	Remarks
1	Army Safety Centre Staff	Advanced Diploma (Level 6) in Occupational Health and Safety (RFQ <sup>24</sup> Level 6). Safety CPD is to be used to demonstrate Competency.	All SO1/C1 (Minimum 2 staff holding Level 6).
2	SO1 Fire & EP (ASCen)	National Certificate in Fire Safety and Risk Management (VRQ Level 3 <sup>25</sup> ) F&EP is to be used to demonstrate Competency.	
3	SO2 EP (ASCen)	Institute of Environmental Management and Health. EP CPD is to be used to demonstrate Competency.	
4	SO1 SHE/Force Protection	A General Certificate (Level 3) in Occupational Health and Safety (RFQ Level 3). Advanced Diploma (Level 6) in Occupational Health and Safety (RFQ Level 6). The Army Equipment Safety Training for Cap Staff (online via DLE). Safety CPD is to be used to demonstrate Competency.	This must be achieved within 6 months of taking up appointment. Within 18 months of taking up the post. However, this is only required if the post holder has at least 3 years left in service.

<sup>24</sup> Regulated Qualifications framework (RQF) and all qualifications regulated by Ofqual (in England) are on this framework ie IOSH Level 3 etc.

<sup>25</sup> Vocationally Related Qualification (VRQ) at Level 3 within the National Qualifications Framework (NQF) and Qualifications and Credit Framework (QCF), or A-Level standard.

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5	Chief Engineer (Army)	The Army Equipment Safety Training for Cap Staff (online via DLE). The link to the online course is <a href="#">here</a> . System Safety in Action (completed online plus attendance at a workshop). A General Certificate (Level 3) in Occupational Health and Safety (RFQ Level 3) and, where possible, to Advanced Diploma (Level 6) in Occupational Health and Safety (RFQ Level 6).	Full details of the System Safety Training suite of courses are <a href="#">here</a> ; this includes the System Safety in Action course.
6	HoC - Safety and Assurance staff and appointed ACAI safety posts within HoCs	The Army Equipment Safety Training for Cap Staff (online via DLE). The link to the online course is <a href="#">here</a> . System Safety in Action (completed online plus attendance at a workshop).  A General Certificate (Level 3) in Occupational Health and Safety (RFQ Level 3).	Full details of the System Safety Training suite of courses are <a href="#">here</a> ; this includes the System Safety in Action course.
7	HoCs	Staff officers who represent the HoC at Safety Panels, together with those that provide policy, direction or advice that allows the Part 3 Safety Case to be developed/maintained.  The Army Equipment Safety Training for Cap Staff (online via DLE). The link to the online course is <a href="#">here</a> . System Safety in Action (completed online plus attendance at a workshop).  Where a greater understanding of the acquisition process is required <sup>26</sup> , those personnel must attend the System Safety Process Management (completed online plus attendance at a workshop). Typically, this will include HoC staff officers attending in-service safety panels/safety committees, Capability Integration Working Groups and Availability Working Groups.	Job Descriptions must include the relevant training applicable to that post.  Full details of the System Safety Training suite of courses are <a href="#">here</a> ; this includes the System Safety in Action course.
8	Bde SO2/C2 SHE	A General Certificate (Level 3) in Occupational Health and Safety (RFQ Level 3) and, where possible, Advanced Diploma (Level 6) in Occupational Health and Safety (RFQ Level 6).	Working towards or on appointment. On 3 years return of service.

<sup>26</sup> These will be the designated Safety Critical posts.

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9	Head of Establishment (HoE)	HoE are to be formally appointed by a directed letter (articulating their role and responsibilities) through HQ RC and are to complete the HQ RC HoE training package ( <i>once developed</i> ) either prior to appointment or within 3 months of appointment.	
10	Commanding Officers	Mandatory attendance on the Commanding Officer's Designate Course, Duty Holder training online via DLE (Course Code 101).	
11	Army Force Protection Advisers (AFPA)	A General Certificate (Level 3) in Occupational Health and Safety (RFQ Level 3).	Must be 'working towards' or completed prior to appointment.
12	Unit Safety Advisers (USAs) or nominated Safety leads within units	All Arms Unit Safety Advisers Course.	
13	Officers	All officers are to undergo safety training at RMAS, on career development courses and during pre-employment training.	
14	NCOs	All soldiers selected for promotion to JNCO and SNCO will undergo Safety Management and Risk Assessment training as part of the CLM syllabus or within PTI courses.	
15	Recruits and Soldiers	All personnel will undergo the safety Workplace Induction Package (WIP) on joining the Army and every 3 years thereafter. Other safety training as directed by COs.	
16	Mandated Unit S&EP Trained personnel	As set out in Army Individual Development Branch's Compendium of Mandated Training.	To include DSEAR DLE learning for relevant staff.
17	For all other Safety and Environmental Protection Trg	Training requirements units should comply with the <a href="#">Compendium of Mandated Course Trained Personnel</a> .	If further clarification is required, units should contact SO1 Training, Education and Learning (SO1 TEaL), ASCen.

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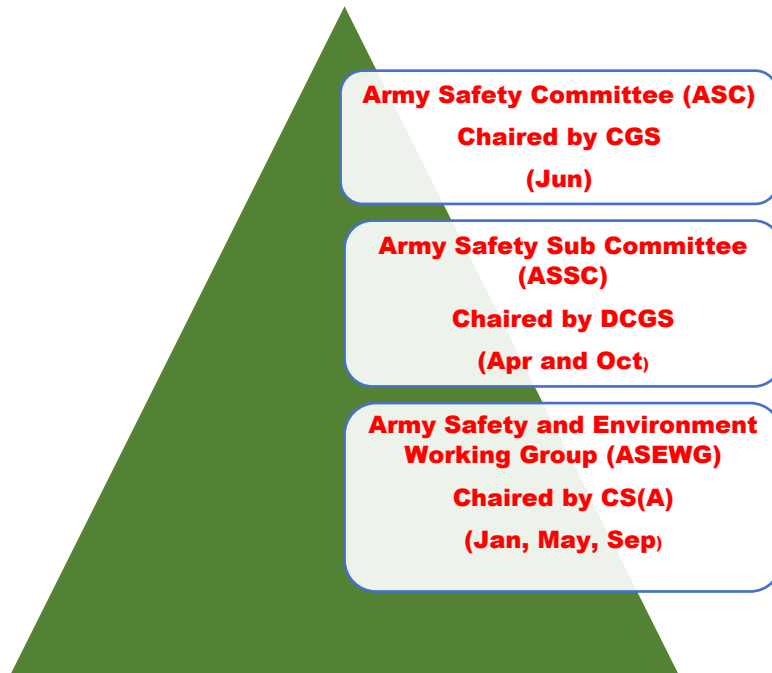
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## CHAPTER 2

### ARMY SAFETY GOVERNANCE

#### Introduction

1. The Army Safety Governance Structure is:



#### Part 1

#### Roles and Responsibilities

2. Army Safety Committee (ASC):
  - a. Aims:
    - (1) Maintain an awareness of critical Safety issues.
    - (2) Provide governance to manage Safety risk.
  - b. Chaired: CGS is to chair the ASC.
  - c. Attendance: key senior officers in Safety-facing roles (GOCs expected).
  - d. Scheduling: to meet annually in Jun.
  - e. Terms of Reference (ToRs): are at Annex A.
3. Army Safety Sub Committee (ASSC):
  - a. Aims:
    - (1) to support CGS in his role as the TLB's Senior Duty Holder.

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- (2) monitor progress of the work directed by the ASC.
  - (3) prepare DCGS for his attendance at the tri-annual Defence Safety Committee (DSC) (chaired by DG DSA).
  - b. Chaired: DCGS is to chair the ASSC.
  - c. Attendance: key senior officers in Safety-facing roles (Usually Safety Champion COS, DCOS or equivalent).
  - d. Scheduling: to meet bi-annually in Apr and Oct.
  - e. Terms of Reference (ToRs): are at Annex B.
4. Army Safety and Environmental Working Group (ASEWG):
- a. Aims:
    - (1) Support DCGS in his role as the Army Safety Champion.
    - (2) Receive direction from the ASSC.
    - (3) Monitor progress of the work directed by the ASSC.
    - (4) Provide updates and briefings.
  - b. Chaired: Chief Safety (Army) (CS(A)) is to chair the ASEWG.
  - c. Attendance: Safety staff and desk officers leading on key Safety issues.
  - d. Scheduling: to meet tri-annually in Jan, May and Sep.
  - e. Terms of Reference (ToRs): are at Annex C.
5. Chief Safety (Army) is to:
- a. Maintain the Army Safety Battle rhythm.
  - b. Appoint a suitable desk officer at either SO1 or C1 level to lead on the preparation for the ASC, ASSC and ASEWG.
  - c. Provide administrative support to ASC, ASSC and ASEWG.
  - d. Attend DSC as directed.
  - e. Be prepared to deputise for the Army Safety Champion as directed
6. The Army Safety and Environmental battle rhythm is set by the ASSC and endorsed by the ASC using the Safety governance template:



Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Q4			Q1			Q2			Q3		
	DSC				DSC			DSC			
					ASC						
			ASSC						ASSC		
ASEWG				ASEWG				ASEWG			

## Part 2

7. In order to ensure that S&EP performance is optimised, it is driven by CGS who chairs the ASC. This top-level governance will ensure CGS and key senior officers in Safety-facing roles will maintain an awareness of critical Safety issues and provide governance to manage Safety risk. It is the forum in which CGS will review Safety performance over the previous 12-months through the Annual Assurance Report (AAR) and set priorities for the forthcoming year.

8. The ASC is the Army’s strategic safety and environment governance board. Its remit covers all Army personnel, equipment, infrastructure and activity, irrespective of command arrangements with other TLBs, and others who may be affected by the Army’s acts or omissions. Its role is to ensure that the Army’s Safety Management System remains fit for purpose, is adhered to, assured and adequately resourced. It has continuous improvement of Safety as its central tenet and recognises that S&EP underpins the physical and morale components of fighting power and is therefore an enabler of Army capability. The ASC will be supported by the Army Safety Sub-Committee (ASSC).

9. The ASSC will be chaired by DCGS, the Army’s ‘Safety Champion’ and sit biannually. It will be scheduled to prepare DCGS for the Defence Safety Committee (DSC). It will also be in direct support of the annual ASC chaired by CGS. As such, the role of the ASSC is to take forward the direction of the ASC and support CGS in his role as the Army’s SDH. Its scope and remit will cover all Army personnel, equipment, infrastructure and activity, irrespective of command arrangements with other TLBs, and others who may be affected by the Army’s acts or omissions. It will ensure that the Army’s Safety Management System remains fit for purpose, is adhered to, assured and adequately resourced. It has continuous improvement of Safety as its central tenet and recognises that S&EP underpins the physical and morale components of fighting power and is therefore an enabler of Army capability. It is also designed to support CGS in his role as the TLB’s Senior Duty Holder and to monitor progress of the work directed by the ASC.

10. The ASSC will be supported by the tri-annual Army Safety and Environment Working Group (ASEWG) chaired by CS(A). This is a desk level forum with representation from Safety staff and desk officers leading on key Safety issues. It will take direction from the ASSC for which it will provide updates and briefings.

11. The ASEWG maintains and reviews the CS(A) Safety and Environment Risk Register and tracks the “actions” that fall out of the ASC and ASSC. The ASEWG reviews S&EP performance and considers S&EP issues and risks for potential elevation to the Committee level. The ASEWG draws its membership from across the Army and has a key role in ensuring that the Army’s Safety and Environment Management System (based on Plan, Do, Check, Act) (SEMS)<sup>27</sup> along with the organizational arrangements for the SEMS remain fit for purpose.

### Annexes to Chapter 2:

- A. Terms of Reference for the Army Safety Committee (ASC).
- B. Terms of Reference for the Army Safety Sub Committee (ASSC).
- C. Terms of reference for the Army Safety and Environmental Working Group (ASEWG).

<sup>27</sup> ACSO 3216.

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## **TERMS OF REFERENCE FOR THE ARMY SAFETY COMMITTEE (ASC)**

1. As the Army's strategic safety governance committee, the ASC will:
  - a. Inform, develop and promulgate strategic-level Safety policy for the Army, ensuring it is mature and mapped to MOD Safety policy.
  - b. Consider all risks owned by the SDH and key risks owned by ODHs to ensure that:
    - (1) They continue to be held at the appropriate level – directing that they are appropriately Treated, Tolerated, Terminated or Transferred.
    - (2) They are ALARP and tolerable to the risk owner.
    - (3) Compound risks are identified and managed.
  - c. Review priorities for investment in safety-critical areas in order to reduce risks and hazard levels.
  - d. Confirm compliance with safety legislation, noting Derogations, Exemptions and Disapplication (DEDs) as appropriate, and consider the impact and implications to Army activity of emerging legislation or policy.
  - e. Consider and analyse safety data in order to identify trends, direct mitigating action, risk ownership and wider implications (eg reputational and/or financial risk).
  - f. Set safety-related priorities and direct the activity of the ASSC.

### **Timing**

2. The ASC will meet annually in June in order to review the previous year's performance and set priorities for the forthcoming year.

## Agenda

3. The standing ASC agenda is<sup>28</sup>:

<b>ARMY SAFETY COMMITTEE – STANDING AGENDA</b>		
<b>Item</b>	<b>Output</b>	<b>Lead</b>
1. Opening Comments		Chair
2. Review Actions from Last Meeting	Progress update on actions arising from the last ASC/ASSC.	DCGS/CS(A)
3. Review Safety Performance and DRAFT AAR	Review of Safety performance since last meeting and consider DRAFT Annual Assurance Report (AAR).	CS(A)
4. Review Safety Risks	Update on all Safety risks owned by the SDH. Update on key risks owned by ODHs. Review pan-Army risks. Assess potential Safety impacts from future change programmes, investment decisions, legislation and policy changes, etc.	DCGS/CS(A) ODHs DCGS/CS(A) DCGS/CS(A)
5. Review Safety Governance Arrangements and Policy	Confirm or adjust/amend Governance structures and Policy.	CS(A)
6. Investigation and Inquiry Update	Update on accident investigations and SIs.	D Pers CS(A)
7. AOB	As raised by ASC members.	Chair
8. Safety Priorities	SDH briefs his Safety priorities for the next period.	Chair
9. Closing Remarks	SDH assessment of current and future Army Safety risk profile and whether RtL is ALARP and tolerable.	Chair
10. DONM		Sec

<sup>28</sup> This may be amended as required by CGS or DCGS.

## Membership

4. CGS, as the Army SDH, will chair the ASC. Membership is shown in the table below:

Ser	Member	
1	DCGS	Army Safety Champion
2	CFA / COS FA	3* Oversight and ODH
3	Comd HC	3* Oversight
4	DG DSA	DSA Perspective
5	GOC 1XX	ODH
6	GOC 3XX	ODH
7	GOC FTC	ODH
8	GOC RC	ODH
9	GOC LONDIST	ODH
10	DLW	ODH
11	GOC ARITC	ODH
12	Comd JHC	ODH
13	COS FA	ODH for 16 AA X
14	ACGS	Organisational Safety Assessments
15	D Cap	ODH and Safe Eqpt proponent
16	D Sp	Champion for through-life Safe Capability
17	D Pers	Safe People proponent
18	D B&I	Safe Place proponent
19	DALS	Legal advice
20	Army Inspector	Assurance and Compliance
21	Senior Health Advisor	Health
22	Chief Fire Officer	DFR
23	CS(A)	S&EP – Annual Assurance Report (AAR) author
24	CESO(A)	Regulation and Policy
25	Defence Land Safety Regulator	DSA/Regulator perspective
26	DE&S PEng LEOC	Eqpt Related Safety
27	ASCen SO1 Assurance	Secretariat

5. The following will be invited to attend as required:

28	Rep Army Sec	
29	ACOS CTG	Collective Training Issues
30	JFC Rep	
31	RN Rep	
32	RAF Rep	
33	LESO	Land Equipment
34	SO1s SHE/FP	Supporting the ODHs

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## **TERMS OF REFERENCE FOR THE ARMY SAFETY SUB-COMMITTEE (ASSC)**

1. The ASSC will:
  - a. Inform and, if necessary, develop Army Safety policy, ensuring it remains appropriate, relevant and mapped to MOD Safety policy.
  - b. Provide DCGS with an opportunity to raise specific safety issues and consult key stakeholders prior to the biannual DSC.
  - c. Consider all risks owned by the SDH and key risks owned by ODHs to ensure that:
    - (1) They continue to be held at the appropriate level – directing that they are appropriately Treated, Tolerated, Terminated or Transferred.
    - (2) They are ALARP and tolerable to the risk owner.
    - (3) Compound risks are identified and managed.
  - d. Consider and analyse safety data in order to identify trends, direct mitigating action, risk ownership and wider implications (eg reputational and/or financial risk).
  - e. Review priorities for investment in safety-critical areas in order to reduce risks and hazard levels.
  - f. Confirm compliance with safety legislation, noting Derogations, Exemptions and Disapplication's (DEDs) as appropriate, and consider the impact and implications to Army activity of emerging legislation or policy.
  - g. Set safety-related priorities and direct the activity of the ASEWG.

### **Timing**

2. The ASSC will meet biannually in April and October.

## Agenda

3. The standing ASSC agenda is<sup>29</sup>:

<b>ARMY SAFETY SUB COMMITTEE (ASSC) - DRAFT STANDING AGENDA</b>		
<b>Item</b>	<b>Output</b>	<b>Lead</b>
1. Opening Comments		Chair
2. Review Actions from Last Meeting	Progress update on actions arising from the last ASC/ASSC.	DCGS/CS(A)
3. Review Safety Performance and DRAFT AAR	Review of Safety performance since last meeting and consider DRAFT Annual Assurance Review (AAR).	CS(A)
4. Review Safety Risks	Update on all Safety risks owned by the SDH. Update on key risks owned by ODHs. Review pan-Army risks. Assess potential Safety impacts from future change programmes, investment decisions, legislation and policy changes, etc.	DCGS/CS(A) ODHs DCGS/CS(A) DCGS/CS(A)
5. Safety Case Management	Update on Safety Case Reviews Forthcoming Safety Case activities New Safety Cases required	D Cap/LESO LESO D Cap/LESO
6. Review Safety Governance Arrangements and Policy	Confirm or adjust/amend Governance structures and Policy.	CS(A)
7. Investigation and Inquiry Update	Update on accident investigations and SIs.	CS(A) D Pers
8. AOB	As raised by ASC members.	Chair
9. Safety Priorities	SDH briefs his Safety priorities for the next period.	Chair
10. Closing Remarks	SDH assessment of current and future Army Safety risk profile and whether RtL is ALARP and tolerable.	Chair
11. DONM		Sec

<sup>29</sup> This may be amended as required by DCGS.



## Membership

4. DCGS will chair the ASSC. Membership is shown in the table below:

Ser	Member	
1	ACGS	Army HQ
2	CFA Rep	ODH and 3* Oversight
3	Comd HC Rep	3* Oversight
4	1XX Rep	ODH
5	3XX Rep	ODH
6	FTC Rep	ODH
7	RC Rep	ODH
8	LONDIST Rep	ODH
9	DLW Rep	ODH
10	ARITC Rep	ODH
11	LWC Rep	ODH
12	JHC Rep	ODH
13	D Cap Rep	ODH and Champion for through-life Safe Capability
14	D Pers Rep	Safe People proponent
15	D Infra Rep	Safe Place proponent
16	Army Inspectorate Rep	Assurance and Compliance
17	Army Health Rep	Health SME
18	CS(A)	S&EP – Annual Assurance Report author
19	CE(A)	JFC view
20	CESO(A)	Regulation and Policy
21	CESO(JFC)	Safe Equipment proponent
22	LESO	Land equipment
23	Defence Land Safety Regulator	DSA/Regulator perspective
24	DE&S PEng LEOC	Eqpt Related Safety
25	ASCen SO1 Assurance	Secretariat

5. The following will be invited to attend as required:

27	H&S Rep	Directorate of Children and Young Persons (DCYP)
28	Brigadier Army Staff (BAS)	Dependent on agenda
29	DALS Rep	Legal advice (HASAWA 74, Corporate Manslaughter etc.)
30	Deputy Chief Fire Safety Officer (DCFSO)	DFR
31	ACOS CTG	Collective Training Issues
32	SO1s SHE/FP	Supporting the Rep from their 2* commands

Unless an appointment has been specified, attendance is expected to be at the COS/OF5/Command Safety Champion level.

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## **TERMS OF REFERENCE FOR THE ARMY SAFETY AND ENVIRONMENT WORKING GROUP (ASEWG)**

1. The ASEWG will:
  - a. Review the CS(A) Safety and Environment Risk Register.
  - b. Convey the key messages from the ASC and ASSC and track the Actions arising from both meetings, directing and informing further work as required.
  - c. Review S&EP management information.
  - d. Review Safety and Environmental lessons (from DLIMS).
  - e. Consider papers from ASEWG members on S&EP issues that potentially require elevating to the ASSC level.
  - f. Review other S&EP issues as directed by CS(A), such as:
    - (1) S&EP lesson learning
    - (2) Equipment safety
    - (3) Road safety
    - (4) Fire risk
    - (5) Radiation Protection
    - (6) Infrastructure safety (SO1 RC SHE)
    - (7) Safety training
    - (8) Provision of SQEP in safety critical posts
    - (9) Communications and messaging
  - g. Discuss any other business raised by ASEWG members.
2. The output from the ASEWG will be in the form of Record of Decisions (with ASEWG slide pack attached) and the CS(A) Activity Tracker.

### **Timing**

3. The ASEWG will meet tri-annually in Jan, May and Sep.

## Agenda

4. The ASEWG Standing Agenda items are<sup>30</sup>:

<b>ARMY SAFETY AND ENVIRONMENTAL WORKING GROUP (ASEWG) - STANDING AGENDA</b>		
<b>Item</b>	<b>Output</b>	<b>Lead</b>
1. Opening Comments		CS(A)
2. ASC/ASSC Outputs	Progress update on actions arising from the last ASC/ASSC	CS(A)
3. Review Actions from Last Meeting		CS(A)
4. Management Information	Reporting profile and trend analysis	SO2 AINC
5. Formation Updates	Only showing changes from previous meeting	3*/2* Formations
6. Review Safety Risks	Update on all Safety risks owned by the SDH (Army Risk Register)  Review pan-Army risks  Assess potential Safety impacts from future change programmes, investment decisions, legislation and policy changes, etc.  Risks to be elevated to ASSC	CS(A)  DDHs  CS(A)  CS(A)
7. Weak signals (AC&I)	Identification of and pre-emptive action for.	SO1 H&S, Army Insp.
8. Fire S&EP	Update on fire issues on Defence Estate	DFR
9. Health Issues	Current health concerns	SO2 HQ Pol, Army Health
10. Equipment Safety	Current equipment safety issues	LESO
11a. AT Safety (Jan)	Update	Sec, ASCB
11b. Sports Safety (May)	Update	COS, ATG(A)
11c. Estate Safety (Sep)	Update	CESO(DIO)
12. Environmental Protection	Environmental Protection issues	SO2 EP
13. Lessons	Safety Lessons Learned	SO1 Safety Lessons
14. TU Matters	Civilian workforce safety issues	TU Rep
15. Safety Priorities	CS(A) briefs his Safety priorities for the next period <sup>31</sup> .	CS(A)
16. Closing Remarks	SDH assessment of current and future Army Safety risk profile and whether RtL is ALARP and tolerable.	CS(A)
17. DONM		Sec

<sup>30</sup> This may be amended as required by CS(A).

<sup>31</sup> Jan ASEWG includes AAR returns.

## **Membership**

5. Membership is at Appendix 1.

## **Formation Returns**

6. Formation returns are at Appendix 2.

### Appendices:

1. Army Safety and Environment Working Group Terms Attendance List (Core and Invite).
2. Army Safety and Environment Working Group Formation Returns.

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### Army Safety and Environment Working Group Terms Attendance List (Core and Invite)

1. Membership of the Board is set at SO1 level and representation is required as follows:

SER	UNIT	POST	RANK/GRADE
1	ASCen	CS(A)	Col
2	ASCen	DCS(A)	Lt Col
3	ASCen	CESO(A)	B2
4	ASCen	SO1 F&EP	C1
5	ASCen	SO1 Safety Management	C1
6	ASCen	SO1 Assurance	C1
7	ASCen	SO1 Res	Lt Col (Res)
8	ASCen	OC AINC	C2
9	ASCen	SO2 Lessons	C2
10	ASCen	SO2 EP	C2
11	ASCen	SO2 Comms	C2
12	DSA	DLSR	Col
13	DFR	DFR Rep	B2/C1
13	LESO	Land Equipment	B2
14	Army Inspector	SO1 H&S	Lt Col
15	D Strat Org Br	SO1 (OSA)	Lt Col
16	SHA(A)	SO1 Occ Med	Lt Col
17	Army Sp Log EOD	SO1 IEA (DH)	Lt Col
18	HQ Army SCM	SO1 Safety Case Management	C1
19	HQ Field Army	SO1 Force Protection	C1
20	HQ JHC	SO1 Ground Safety	C1
21	HQ 1 (UK) Div	SO1 Force Protection	C1
22	HQ 3 (UK) Div	SO1 Force Protection	C1
23	HQ 16 AA X	SO1 Mil Para (DH)	Lt Col
24	HQ Home Command	SO1 SHE&SD	C1
25	HQ Regional Command	SO1 SHE&SD	C1
26	HQ Regional Command	Army Maritime Inspector	C1
27	Diving Standards Team	Diving Standards Officer (Army) (DH)	Maj
28	HQ ATG(A)	SO1 Safety/Training (DH)	Lt Col/C1
29	APSG	SO1 Service Inquiries	C1
30	HQ FTC	SO1 Force Protection	C1
31	HQ LONDIST	SO1 HSEP	C1
32	HQ ARITC	SO1 SHE	C1

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33	HQ LWC	SO2 SHE	Maj
34	TU Rep	Army TLB TU representative	

2. Invitational Attendance:

1	D Cap	COS	Col
2	DIO HQ Plans	SD Trg Safety	B2
3	DIO Infra	SO1 Infra	Lt Col/C1
4	HoC GM	SO1 COS	Lt Col
5	HoC CSS	SO1 COS	Lt Col
6	D Pers	SO1 Plans	Lt Col
7	D Info	SO1 Concepts	Lt Col
8	DALS	SO1 Employment Law	Lt Col
9	Hd Trg	SO1 Trg Pol	Lt Col
10	Hd Log	SO1 Trg Pol	Lt Col
11	Hd Eqpt	SO1 Eqpt Stds	Lt Col
12	Army Sp Log	CATO	Lt Col
13	HQ SASC	Comdt	Lt Col
14	DCYP	SHEF Rep	C2
15	HQ RC (Cadet Br)	SO1 SHE, HQ RC (or SO1 Cadet Trg if req)	C1/Lt Col
16	APSG	SO1 Lessons	Lt Col
17	APSG	SO2 Lessons	Maj

3. Additionally, invitations to attend will be extended to subject matter experts engaged in discrete S&EP work, such as Noise Induced Hearing Loss, Vibration at Work, Military Diving, Maritime, regulatory reform and other such issues that arise.



**Army Safety and Environment Working Group Formation Returns**

Formations are to submit their returns 7 days before the ASEWG. The key points of which are to be verbally summarise. The Returns are to cover the following areas:

FMN:		Date:
QUESTION	RESPONSE	
1 – to identify the extent to which the formation is complying with legislation.		
2 – identification of gaps in Suitably Qualified and Experienced Personnel (SQEP) within your formation/organisation.		
3 – details of 2* (ODH) Acceptance of Risk.		
4 – details of changes to formation Risk Registers.		
5 – verify the way in which you acquire your assurance information, and the confidence that you have in that information.		
6 - your commander's overall assessment of Safety Culture in his formation/organisation.		
7 – details of formation/organisation Best Practice.		

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## CHAPTER 3

### SAFE SYSTEM OF WORK / TRAINING

#### Introduction

1. This Chapter is intended to assist Commanders manage the balance between the safety risks faced and potential benefits that may accrue. Commanders must integrate risk management into their planning and estimates, ensuring that controls are in place to ensure risks in hazardous training and activities are managed to ALARP and tolerable.

#### Part 1

#### Duties

2. **Commanders.** Commanders have a personal responsibility for ensuring that activities are conducted in accordance with Service Instructions, Regulations, Defence Codes of Practice (DCOP), Directives and Policy while taking due regard to any risks to personnel. This responsibility cannot be delegated. The mechanisms for discharging this duty may be delegated and assistance and support obtained, but legal responsibility remains with the MOD through its Chain of Command.

3. Commanders, normally Commanding Officers, who direct activity, are to ensure that:

a. Activity takes place in a manner that is as safe as is reasonably practicable, in accordance with current Service Instructions, DCOPs, Policy, Regulations and Directives.

b. DCOP, Service Instructions, Policy, Regulations and Directives applicable to the training activities are complied with in full and are communicated to those supervising and delivering the training, as well as those undergoing training.

c. The Safe System of Work (SSOW) is applied to every activity, including activity undertaken on operations<sup>32</sup>. If the particular activity is not already covered by an existing SSOW, an activity-specific risk assessment covering all areas of the SSOW must be undertaken and any control measures required must be implemented in full.

d. Those being trained are informed of the hazards they will face during the training.

e. When, as a result of a risk assessment, the residual risk cannot be adequately controlled within the SSOW and the activity is routine and enduring, and deemed necessary to maintain operational effectiveness, the Commander obtains the relevant approval for the activity to take place via the Chain of Command.

f. Records of key training meetings are to be kept and any lessons learnt during training are to be documented (using DLIMS) and, where appropriate, implemented.

g. The effects of any changes to proposed exercises, particularly exercises in progress, are subjected to further risk assessment before implementing any change. All evidence must be kept for auditable purposes.

4. **1\* Commanders.** 1\* Commanders (or where appropriate OF5) must study the submissions made by their subordinate Commanders for activities carrying significant risk that cannot be managed within the SSOW. If the Defence benefit is critical, the 1\* Commander can suggest

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<sup>32</sup> It must also be acknowledged that the activity may be influenced by an adversary.

and/or resource additional controls to bring the activity back to within a SSOW or elevate the submission to the 2\*/3\* level, otherwise moderate the directed training requirement to reduce the risk. 1\* Operational Theatre Commanders are permitted to authorise Operational Dispensations. An Initial Operational Dispensation may be granted for a period of 28 days whilst an Urgent Statement of User Requirement is developed, and the submission is then considered by the force generating 2\* Commander and the relevant Safety and Environmental Committee<sup>33</sup>.

5. **2\* Commanders.** The force generating 2\* commander must study submissions made by the force generating 1\* wishing to deviate from Service Instructions, DCOPs, Policy, Regulations and Directives, particularly if it involves live fire training. If the Defence imperative is identified and following advice from the relevant Safety and Environmental Committee, they are satisfied that the risks are ALARP and tolerable<sup>34</sup> to them, they can approve the activity. It is normally only the force generating 2\* commander who can approve such activities and approvals must be documented.

6. **Persons Undergoing Training.** Personnel undergoing training are not considered Competent until they have met the test of Qualification, Currency, Experience and Maturity and shall adhere to any instructions delivered before or during training. The level of supervision and competency of those instructing and supervising will be directed by the appropriate commander. Trainees are to adhere to all instructions.

7. All risk assessments, together with the resultant control measure instructions, are living documents. Reviews must be carried out:

- a. If there is reason to suspect that the risk assessment is no longer valid.
- b. If there are significant changes to the activity.
- c. Annually.
- d. Immediately following any accident or incident.
- e. If there are changes in policy that affect the activity.
- f. If training is being delivered by a foreign nation and not to the appropriate NATO Standard.

8. Redundant risk assessments must be retained for 3 years.

9. **Short Term Training Team (STTT)/ Defence Engagement (DE).** Where an STTT/DE and some OTX activity which is at Medium/High Risk; remote locations; or involves an armed deployment, as in Overseas Operations, the coordinating HQ for STTT/DE and some OTXs activities are to:

- a. Set the Safe Operating Envelope.
- b. Set Theatre Entry Standards.
- c. Conduct assurance on those Medium/High Risk activities that endure longer than 28 days or as directed by Formation Commander.

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<sup>33</sup> [DSA 03.DLSR.LSSR - DCoP G](#) provides details of the Operational Dispensation process.

<sup>34</sup> 'Tolerable' does not mean 'acceptable'. It refers instead to a willingness by society as a whole to live with a risk so as to secure certain benefits in the confidence that the risk is one that is worth taking and that it is being properly controlled. However, it does not imply that the risk will be acceptable to everyone, ie that everyone would agree without reservation, to take the risk or have it imposed on them. ([HSE Reducing risks, protecting people](#)).

10. **Duty Holding.** When Duty Holding Risk to Life (RtL) activities are involved in the deployment of an STTT, the DH responsibilities are transferred to HQ Field Army and the supervising Divisional HQ (ODH). However, where there are **no** RtL activities involved and where **no** Defence Engagement (DE) relationship exists HQ Home Command may, subject to agreement, be nominated as the coordinating headquarters.

## Part 2

11. Health and Safety legislation requires all activities to be conducted within a Safe System of Work (SSOW). In the military context, this is extended to encompass the Safe System of Training (SSOT):

a. **Safe System of Work (SSOW)**<sup>35</sup>. In order to ensure uniformity of practice and clarity of implementation, all military SSOWs consist of a common format which is broken down into 4 parts:

(1) **Safe Persons.** Personnel who have been given the appropriate information, instruction, training and supervision to enable them to carry out a specific activity as a competent person with the appropriate qualification, currency, maturity and experience.

(2) **Safe Equipment.** Equipment brought formally into Service together with the associated documentation and underpinned by a Safety Case to ensure its safe use by a competent person. Where no Safety Case exists, any equipment hazards must form part of the activity-specific Risk Assessment.

(3) **Safe Practice.** The safe conduct of any activity, including those arising from the use of equipment, in a specific location, by competent Persons. Safe Practice is normally contained in documentation, eg Pamphlet 21 for Live Fire Training.

(4) **Safe Place.** This is the space to be occupied by the military for the conduct of their activities and includes any surrounding areas together with any military or civilian population which might be affected by those activities. The Safe Place must form part of the activity specific Risk Assessment taking into account the proposed use of the space and controls put in place.

b. **Safe System of Training (SSOT)**<sup>36</sup>.

(1) The SSOT, using the standard SSOW format when conducting any training activity, takes into account that those under training cannot be deemed Competent. It enables the Army to meet its training requirement to ensure that personnel are prepared for operational roles whilst maintaining risks at ALARP and tolerable. It is essential that those who direct and manage the training are competent.

(2) The acceptable level of training risk is set by the appropriate ODH who owns the training audience.

c. **Safety on Operations.** Safety on operations remains a key component for Force Elements considering the operational realities. Within the SSOW, there may be risks, resulting from certain hazards within the operational environment, which must be accepted due to limits on the controls which could be put in place to reduce the risk. Responsibility for accepting the increased level of risk lies with the operational commander (and the operational Chain of Command) and all decision making must be recorded.

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<sup>35</sup> JSP 375 Part 2 Volume 1 Chapter 8 refers.

<sup>36</sup> JSP 375 Part 2 Volume 1 Chapter 40 refers.

## Managing the SSOT

12. The SSOT consists of the four separate elements shown in Paragraph 11a above, where the hazards have been assessed and the consequent controls have been approved at the highest level and integrated into formal procedures in order to reduce the risks to the ALARP and tolerable condition within the constraints imposed by the Training Imperative.

13. **Safe Persons.** A Competent person within the SSOT is deemed competent by virtue of qualifications, currency, experience and maturity. It is essential that Commanders ensure instructors are competent and given the appropriate level of supervision to ensure that the delivery of training matches the ability of the trainee and complies in full with the SSOT.

14. **Safe Equipment.** Equipment, (including explosives and ammunition), is brought into service following a Safety Case, with appropriate documentation defining the safe operation and maintenance of the equipment under Service conditions. Commanders must ensure that their subordinates have, and make use of, the correct equipment to carry out an activity. Commanders must ensure that equipment used both by instructors and those under training is operated and maintained as laid down and ensure that only competent persons are allowed to operate and service the equipment. Complete training and maintenance records must be kept along with reporting and feedback to the capability sponsor and the ASCen.

15. **Safe Practice.** Practices are conducted in accordance with drills and instructions laid down by the Service authorities. Drills and procedures, taking into account the Training Imperative, are identified in the equipment Safety Case and developed in accordance with the Systems Approach to Training (SAT). Safe Practice includes following correct procedures, effective training and supervision, the provision of warnings and the use of Personal Protective Equipment (PPE). It is essential that all training is closely supervised by a competent person to ensure that procedures are strictly adhered to. Complete training records must be kept with reporting and feedback to the capability sponsor and the ASCen.

16. **Safe Place.** A Safe Place is one in which the controls necessary to enable authorised training to be conducted safely, have been identified by a site-specific risk assessment, and directed through appropriate Standing Orders such as Range Standing Orders.

## Persons at Risk during Military Training

17. There are 3 categories of people at risk in training:

- a. The military personnel undergoing training and those conducting it.
- b. Controlled personnel including civilian staff and contractors employed in support of training.
- c. The General Public. This includes those unaware of the military training activity and in the worst case, the trespasser, who deliberately disregards warnings or is unable to interpret warning signs be it through age or lack of knowledge or indeed any other factor.

18. Therefore, the first step in training is to establish whether all elements of the SSOT are in place. If all elements of the SSOT are in place the consequent hazards and controls should be recorded on the Risk Assessment and included in the exercise/activity coordinating instructions.

## Risk Assessment

19. The aim of risk assessment in training is to:

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- a. Establish that where any of the elements of the SSOT are not in place, the hazards that arise are recognised along with the corresponding residual risk that they pose.
- b. Analyse the residual risk to decide if the residual risk is:
  - (1) Adequately controlled. Where the risks are deemed by the commander in charge of the training activity to be ALARP and tolerable, the activity can be carried out.
  - (2) Not adequately controlled. Where the risks are deemed unacceptable by the commander in charge of the activity, further measures are to be introduced to reduce the risk to ALARP and tolerable before the activity can be carried out.

20. Where residual risks cannot be adequately controlled the activity is not to proceed unless authority is granted following consideration of the risk by the Chain of Command at the appropriate level.

21. A risk assessment, as set out in Chapter 4, Annex B, must be carried out for all activities when:

- a. Risk assessments for activities at a specific site are not provided.
- b. Instructions for the activity proposed are not covered by, or are contrary to, drills and instructions issued by the appropriate Service authority.
- c. The risk control measures must be included in any operation / exercise coordinating instructions.

22. **Proposed Changes to Training Exercises.** It is essential that the effects of any proposed changes to training exercises be subjected to full written risk assessment. The Health and Safety Executive have pointed out that many military training accidents are the result of last minute changes to exercises where the consequences of such changes have not been fully thought through.

23. **Safe Operating Envelope.** It is common for military activity and/or operations to be delivered within a Safe Operating Envelope allowing for bounded flexibility within the activity. It should be noted that due to the remote locations of some STTT/DE activity Medical Plans<sup>37</sup> in support of such activity should be considered at the 1\* level only. When planning a Safe Operating Envelope, the schematic below shows the areas that should be considered:

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<sup>37</sup> [ACSO 3215 - The Planning of Health Support Services.](#)



## Risk Assessment Process

24. The Army Risk Assessment process is contained with Chapter 4; Safety and Environmental Protection Risk Management. Within Defence, there are 2 formats utilised for risk assessment. As defined in JSP 375 Part 2, Vol 1, Ch 8, risk assessment is a subjective, but logical process which can be broken down into 5 steps:

- Step 1. Identify the hazards.
- Step 2. Decide who might be harmed and how.
- Step 3. Evaluate the risks and identify suitable and sufficient control measures.
- Step 4. Record your findings and implement them.
- Step 5. Review your assessment and update if necessary.

25. A practical aide memoire focussing on this 5 step risk assessment process is available from Army Safety Centre – [“Managing a Safe System of Training Commander’s Pocket Guide”](#).



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26. If all the elements of the SSOT are in place, the Exercise Risk Assessment should list the hazards and controls in place. If parts of the SSOT are missing, or do not cover the activity, then the additional hazards and their corresponding controls, must be added to the risk assessment in the standard format for SSOT risk assessments as at Annex B to Chapter 4.
27. The Exercise Instructions must contain an Exercise Action Safety Plan (EASP) either as part of the coordinating instructions or as a separate Annex giving the details of the controls to be put in place and their execution.
28. Further direction and guidance is contained within the Army Field Manual Training (AFM Trg).

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## CHAPTER 4

### ARMY SAFETY AND ENVIRONMENTAL RISK MANAGEMENT

#### References:

- A. JSP 892 – Risk Management.
- B. JSP 375 – Management of Health and Safety in Defence.
- C. Army Command Standing Order 1109 – Army Risk Policy.

#### Introduction

1. While no death or injury is acceptable, the Health and Safety Executive (HSE) recognises the importance of realistic training in ensuring the Army is prepared effectively to conduct military operations. It accepts that there will always be the risk of injury or death when conducting military training but expects those risks to be identified and properly managed (reduced to As Low As Reasonably Practicable (ALARP and tolerable).

#### Part 1

2. Commanders and risk owners are to clearly articulate the level of acceptable risk and the triggers for responses/escalation by setting risk appetites. In defining this appetite, and so the need for further action, a balanced view must be taken against the required response's cost in terms of time, money, effort, difficulty and the effect on objectives.

3. **Single Unit Activities.** The CO/DDH<sup>38</sup> of the unit conducting the event/activity, or who has unit personnel participating in an event/activity, must endorse the activity or proposed participation and is responsible for ensuring compliance with the direction within this ACSO. While, everyone has a Duty of Care, the CO/DDH is responsible for appointing a suitable Officer, Warrant Officer or NCO to be the event/activity responsible person for the 'Duty of Care' of all participants which must be recorded in the exercise/activity instruction.

4. **Multi-Unit Activities.** Where participating individuals come from more than one unit, then a lead unit must be appointed. The CO/DDH of the lead unit must ensure that the activity has been properly authorised in accordance with this ACSO. The CO/DDH of the lead unit is responsible for appointing a suitable Officer, Warrant Officer or NCO to be responsible for the Duty of Care of all participants and providing assurance as requested by contributing units.

5. **Joint Services Environment.** This ACSO is Army policy, therefore, In Joint Service Units, Navy and RAF personnel can only take part in an event/activity if they are under the command of the Army CO or Army 2\* HQ authorising the event/activity. Army personnel within the joint environment, under Navy or RAF command, should not be disadvantaged.

6. **Exercise Instructions.** All exercise instructions including EASP / RASP / risk assessments and medical plans, irrespective of the activity, should be appropriately endorsed (specifically by the DDH where this is applicable) to demonstrate that an initial assurance check has been conducted on the quality of the documentation and the stated risk mitigation methods.

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<sup>38</sup> Delivery Duty Holder (DDH) for Risk to Life (RtL) activities.

## Part 2

### Safety Risk

7. ALARP and tolerable is a subjective concept which requires careful consideration of the value of potential gain balanced against the risk and the cost of controls and mitigations. Gains may be measured in terms of ability to generate capability or to recruit and retain personnel, whereas costs may be calculated in terms of time, money and trouble (effort put into supervision and risk mitigation).
8. It is appropriate that the ALARP and tolerable cursor is set at different levels through the training progression, with very low tolerance of risk early in the cycle or when inexperienced troops are employed (when the gains are not worth the potential risks), but increasing as experience and confidence grow and training becomes more demanding and realistic in preparation for the realities of operations (training as we fight).
9. The following definitions are used through this chapter<sup>39</sup>:
  - a. **Appetite.** The variation in performance that is acceptable to the commander, representing an agreed zone of performance to operate in without reference to the superior commander. It articulates level of risk and represents a constraint and freedom on the subordinate level.
  - b. **Hazard.** A hazard is anything that may cause harm, such as range activities, handling ammunition, operating military vehicles, contact with chemicals and/or electricity, or specific activities etc.
  - c. **Risk.** An uncertain future event(s) that could affect the achievement of objectives. It is measured in terms of the likelihood of it occurring and the magnitude of its impact. It is described in terms of a cause, event and effect.
  - d. **Consequence.** The potential consequence (or severity) of the risk being realised (it is described in terms of levels of harm and/or loss).
  - e. **Likelihood.** An estimate of the chance of a risk materialising ie how often the risk might happen (eg per activity or within a specified timeframe).
  - f. **Risk Rating.** A measurement of the risk useful for assessing the priority for control measures for the treatment of different risks. The risk rating is derived from the 'risk score' for consequence x 'risk score for likelihood' (see Risk Matrix at Annex A).
  - g. **Risk reduction.** The process by which the risk is managed to reduce the consequence and/or likelihood of the occurrence of the event.
  - h. **Risk owner.** The single point of accountability for the effective management of that risk and is responsible to their commander for it.

### Risk Appetite

10. Risk appetites are not fixed, and will vary within the Army by readiness requirement, Collective Training level as well as competence and resources. They need to take account of the risk management capability of that area (where there is effective risk management and control a greater risk appetite might be appropriate). Risk appetites need to be practicable, providing guidance to enable effective risk decision making and appropriate risk taking, and should be viewed in terms of both freedoms and constraints on the subordinate level. In setting a risk

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<sup>39</sup> HSE definitions <http://www.hse.gov.uk/risk/controlling-risks.htm>.

appetite, the commander must consider what risk they are willing to take to achieve the assigned objectives and set an appetite that is tailored and proportionate.

11. **Risk Appetite**<sup>40</sup>. The risk appetite is the variation in performance that is acceptable to the commander, representing an agreed zone of performance to operate in without reference to the commander<sup>41</sup>. There is a correlation between risk appetite and control culture. A balance must be established between the propensity to take risk, the propensity to exercise control and the degree to which subordinate organisations are empowered. Five levels of risk are linked directly to a hierarchy of authorisation (para 13 below) and are defined as:

- a. **Low Risk.** Activities assessed as Low Risk can be authorised by the Commander.
- b. **Medium Risk.** Activities assessed as medium can be authorised by the Commander/DDH as long as they remain ALARP and tolerable.
- c. **Medium to High.** Activities assessed as Medium to High Risk require elevation to 1\* HQ for subsequent advice and authorisation. The 1\* HQ should be that which is closest to the activity ie for those units deployed on operations, this should be the deployed contingent 1\*HQ and *not* necessarily the contributing 1\* HQ.
- d. **High Risk.** Activities assessed to be High Risk will require authorisation from the unit's Chain of Command/ODH<sup>42</sup>.
- e. **Very High Risk.** Operational Capability where the required outcome impacts on defined military capability.

12. **Identifying the Risk.** The nature and type of risk needs to be identified early on. These could fall into one or more categories:

- a. **Non-operational**<sup>43</sup>. These are risks that could affect the achievement of objectives when not deployed on operations. This could be anything from achieving a collective training level, delivering a capability or delivering a combat ready and adaptable Army prepared for current and future contingencies. It covers threats that could reduce the achievement of an objective or an opportunity that could improve its achievement. Objectives in this area are often related to preparing Force Elements for operations, so non-operational risk in regard to these objectives could affect operational effectiveness. **This policy provides the direction for non-operational risks.**
- b. **Environmental.** Risk to the environment, flora, fauna, wildlife, water courses and infrastructure.
- c. **Corporate.** Risks to corporate systems or processes that undermine the Army's overall governance, operations or ability to deliver capability.
- d. **Reputational.** Risks that could/would damage the Army's professional reputation either nationally or internationally. This might also include the failure to take decisive action.

13. **Risk Rating and Authorisation.** Once the Risk Assessment has been completed, the factors can be scored according to the anticipated risk threshold, all the individual scores can then be added together to create a total risk score. The total risk score will produce a risk rating. This rating is directly linked to the level of authorisation required as defined in Chapter 6 – Army Duty

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<sup>40</sup> Risk appetite for Aviation remains iaw with Annex A of [RA 1210](#).

<sup>41</sup> This includes consideration of the question - are we doing enough about the risk to mitigate threats and take opportunities?

<sup>42</sup> Operating Duty Holder (ODH) for Risk to Life (RtL) activities.

<sup>43</sup> ACSO 1109 – Army Risk Policy, [https://modgovuk.sharepoint.com/sites/defnet/Corp/Army/Publications/ACSO\\_1109.pdf](https://modgovuk.sharepoint.com/sites/defnet/Corp/Army/Publications/ACSO_1109.pdf).

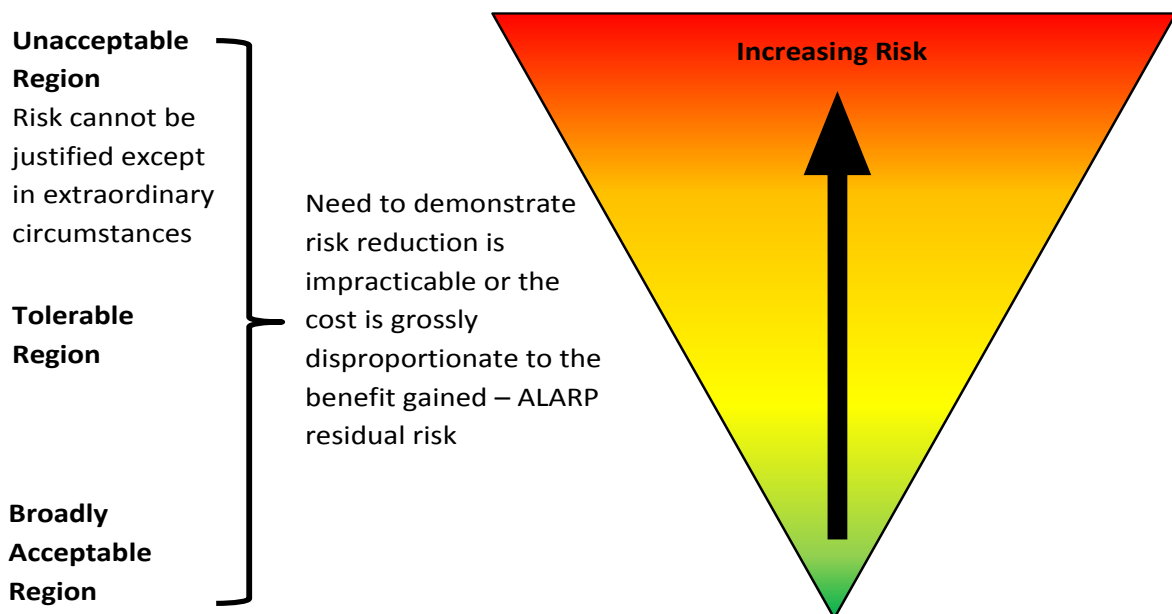
Holding. The risk rating against the total risk score and level of authorisation required is at Annex A.

### Risk Referral

14. Occasionally, a judgement call, by Army HQ, to tolerate very high levels of safety and environmental protection risks to specific groups of people such as the crew of a vehicle, or specific environmental receptors needs to be taken. This decision will be taken in order to preserve or enable an essential capability that balances the identified risks with the counter-risks to people that the capability aims to mitigate. The risk referral process provides an auditable mechanism for formally raising the risk to appropriate level.

15. This may also include Military operations where individuals could be exposed to levels of risk that, in civilian operations, would be considered abnormal. In these circumstances decisions to tolerate such risks to preserve or enable an essential military capability or operational outcome must always be made at appropriate levels of seniority. For risk that breaches legislation this authority lies at Ministerial level, except where National Security is not an element of the exemption clause, which remain with the Minister.

16. The process records decisions at each stage of the referral process. These decisions may involve the release of funds or changes to operating procedures that mitigate the risk, referral of the risk to a higher-level authority or a decision to tolerate the risk due to exceptional operational circumstances. The pace of decision-making will be driven by operational urgency and the risks associated with continued operations must be balanced against the consequences of withdrawing the capability.



17. Risks can be identified by any stakeholder, but will usually be identified by one of the following:

- a. Where a risk has been identified on operations and dispensation sought. Risk referral may be required to establish a temporary dispensation, exemption from legislation until the equipment is modified, or a new capability is introduced. This exemption will last for the duration of that given tour. In extremis, an exemption from legislation may be required.

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b. During the periodic review of an equipment's Hazard Log as part of the safety case management process.

c. During investigation following accidents or near misses where safety issues that require addressing are identified.

d. Where legislation and policy changes due to new information pertaining to a risk from previous legal use, places existing equipment, or activity in breach of that legislation.

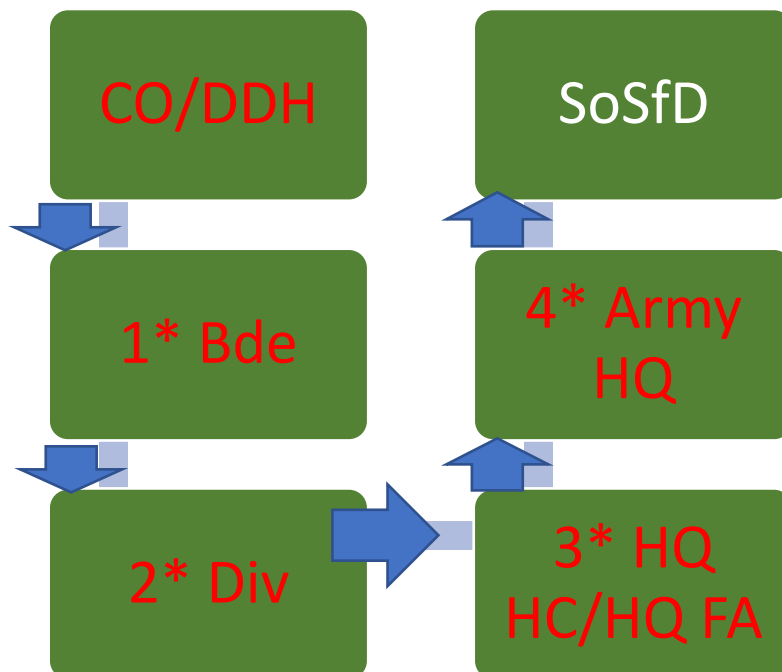
e. Where medical evidence may highlight a previously unknown risk which requires mitigation.

f. By Users, DE&S or contractor during design, use, maintenance or disposal.

g. When equipment has been modified, upgraded or the use changed on a permanent basis.

18. Where a decision cannot be taken at each specific level because it falls outside the delegated level of responsibility, or direction is sought from a higher level, the risk is referred to the next level of command. Referral of such issues through the Duty Holder chain, or Chain of Command will follow a judgment that further action to mitigate risk to a tolerable level is not reasonably practicable because the resulting loss of Defence capability, eg by withdrawal of equipment from service, delaying entry to service and reduction of operational performance, is grossly disproportionate to the benefit of removing or reducing the safety risk.

19. Within the Army TLB, the risk referral route is:



20. In cases where the capability is deployed on operations, this should be conducted through the Operational Dispensation and Risk Referral Process.

21. **Risk Assessment Process.** The Risk Assessment process for Army S&EP is the 5 Step process<sup>44</sup> supported by the Risk Escalation Matrix at Annex A. This process is explained in more detail at Annex A with the **Army Risk Assessment**<sup>45</sup> process shown at Annex B.

## Generic Risk Assessment

22. Generic Risk Assessments (GRAs) are employed where similar activities are undertaken or repeated. These assessments describe the hazards involved and direct a standard set of control measures that are to be employed to reduce the associated risks. Repetitive training activities carried out in training units in particular, lend themselves to GRA.

23. Given infinitely variable factors present in military activities, for example the location of training, the weather or the state of training of personnel, GRAs will require careful scrutiny to ensure that they are applicable to the particular activity at that specific time and location.

24. Where the officer or person carrying out the training risk assessment, for whatever reason, considers that there are still hazards remaining which require additional control measures, he should list them and their corresponding control measures, on the risk assessment form. Further details on the Risk Assessment process for military training are set out in JSP 375 Part 2, Vol 1, Chap 40 using the MOD Form 5015.

Annexes to Chapter 4:

- A. Risk Control Planning.
- B. The Risk Assessment Process for Military Activity.
- C. Military Activity Risk Assessment Proforma.
- D. Safety in Military Training, on Exercises and Operations – Military Activity Risk Assessment Proforma (example).

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<sup>44</sup> HSE Risk – Controlling the risks in the workplace, <http://www.hse.gov.uk/risk/controlling-risks.htm>.

<sup>45</sup> JSP 375 Part 2, Vol 1, Ch 40.



## Risk Control Planning<sup>46</sup>

### ‘He who creates the risk, owns the risk’

1. Below are a series of tables intended to provide risk planning and tolerability tools for the competent individual (conducting a military activity risk assessment), the organiser and/or the commander/CO/Duty Holder<sup>47</sup>:

<b>Controls - Treatment of Risk (5Ts)</b>	
Treat	Response plans, controls, exploitations and mitigations treat the risk to bring it back to within the risk appetite by reducing its likelihood or impact.
Take	Opportunities must be seized with actions taken to increase the risk's likelihood and impact, to maximise the benefits realised.
Tolerate	No action is taken other than monitoring because residual risk is within the risk appetite or the cost of responding to the risk is disproportionate to the benefit.
Terminate	The activities giving rise to the risk are ceased. It is unlikely this course of action will be available in the majority of cases.
Transfer	Transfers, or shares, part of the risk with another party. However, this action does not remove the accountability or the full effects of a risk and is rarely available as an option within the Army.

<sup>46</sup> [ACSO 1109 – Army Risk Policy](#).

<sup>47</sup> Duty Holder for Risk to Life (RtL) activities.

<b>Impact Criteria (Severity)<sup>48</sup></b>				
<b>Level</b>	<b>Non-operational</b>	<b>Environmental</b>	<b>Corporate</b>	<b>Reputational</b>
<b>5 - Critical</b>				
Critical constraint on the ability to deliver a Strategic Objective/Capability.	Multiple fatalities or permanent life changing injuries. Loss of major equipment. Intervention by HSE.	Permanent loss or damage beyond remediation of an important and publicly high profile natural resource, area or species. Multiple incidents causing a major environmental impact. Intervention by the EA.	Critical effect on the Army's overall governance, operations or ability to deliver capability.	Significant long term (4+ years) damage to strategically important international relationships, adverse ministerial interest, outrage/protests from key activists/campaign groups leading to substantial reputational damage.
<b>4 - Severe</b>				
Severe constraint on the ability to deliver a Strategic Objective/Capability.	A single death or multiple life-threatening injuries. Serious damage to major equipment. Intervention by HSE. Intervention by DSA.	Severe damage over a wide area and/or on a prolonged basis to a natural resource, including controlled waters, or geography requiring multi-year remediation. Single incident causing a major environmental effect or multiple incidents causing significant effect. Environment Agency informed.	Severe effect on the Army's overall governance, operations or ability to deliver capability.	Severe short-term (less than 6-month) or moderate long-term damage to strategically important international relationships. Severe short-term or moderate long-term damage to the UK's international geopolitical agenda. Concerted action in parliament questioning the SoSfD. Severe short-term/moderate/long-term outrage/protest. A single high-profile litigation.

<sup>48</sup> ACSO 1109 – Army Risk Policy, June 2018.

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<b>3 - Major</b>				
Major constraint on the ability to deliver a Strategic Objective/Capability.	A single life changing injury or multiple injuries which have a short-term impact on normal or quality of life. Major damage to major equipment. Intervention by DSA.	Moderate damage to an extended area and/or area with moderate environmental sensitivity (scarce/valuable) requiring months of remediation. Single incident causing significant environmental damage. Military (and / or local) Authority informed.	Major effect on the Army's overall governance, operations or ability to deliver capability.	Negative questions posed to ministers in parliament. Short-term major outrage and protests from key activists/campaign groups.
<b>2 - Moderate</b>				
Moderate constraint on the ability to deliver a Strategic Objective/Capability.	Multiple injuries requiring first aid. Moderate damage to major equipment.	Moderate damage to an area and that can be remedied internally. Multiple incidents causing minor environmental effect.	Minor effect on the Army's overall governance, operations or ability to deliver capability.	Short-term major outrage and protest from multiple non-key campaign/activist groups.
<b>1 - Minor</b>				
Minor constraint on the ability to deliver a Strategic Objective/Capability.	An injury requiring first aid. Minor damage to major equipment.	Limited short-term damage to an area of low environmental significance/sensitivity. Incident causing minor environmental impacts.	No loss to the Army's overall governance, operations or ability to deliver capability.	Regional outrage and protest from multiple non-key campaign/activist groups.

Likelihood		Definition	Severity	
5	Highly Probable (Almost Certain)	Is expected to occur in most circumstances	5	Multiple fatalities / Life changing injuries
4	Probable	Will probably occur at some time, or in most circumstances	4	Fatality / Multiple life-threatening injuries
3	Possible	Fairly likely to occur at some time, or some circumstances	3	Single life changing injury / Injury requiring medical intervention
2	Unlikely	Is unlikely to occur, but could occur at sometime	2	Minor injury requiring 1 <sup>st</sup> Aid
1	Remote/Rare	May only occur in exceptional circumstances	1	Minor injury – 1 <sup>st</sup> Aid not required

Risk Matrix<sup>49</sup>

SAFETY RISK ESCALATION						
2* (15 - 16)	3* <sup>50</sup> (20)	Likelihood				
1* (10 - 12)	CO (4 - 9)	1	2	3	4	5
	OC (1 - 3)					
I M P A C T	5	5	10	15	20	25 (4*)
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5

Level of Risk	How Risk should be managed
Very High (25) (CGS, Army HQ)	<b>Operational Capability</b> where the required outcome impacts on defined military capability.
High (20) (3* - HQ HC & FA)	<b>Requires active management</b> require review of desired outcome with additional resources or change to output requirements.
Medium to High (15 - 16) (2* Div HQ)	<b>Contingency Plans</b> may suffice together with limited risk mitigations to achieve risk ALARP and tolerable.
Medium (10 - 12) (OF5/1* Bde HQ)	<b>Good Risk Mitigations</b> to ensure that the impact remains ALARP and tolerable. Re-assess frequently to ensure conditions remain the same.
Low (1 - 9) (OC/CO)	<b>Review periodically</b> to ensure conditions have not changed and working within ALARP and risk appetite.

For activity where the risk is deemed Low, but requires higher authority to deviate, the CO can proceed in accordance with the further direction at Chapter 6, Annex A, Para 1.b.

<sup>49</sup> Does not apply to aviation who are to use Risk management based on Regulatory Article 1210.

<sup>50</sup> It is the 3\* Commander's prerogative (Commander Home Command or Commander Field Army) whether the risk should then be elevated to Army HQ (CGS).

## **THE RISK ASSESSMENT PROCESS FOR MILITARY ACTIVITY**

### **Production and Authorisation of Risk Assessments**

1. **Assessor.** The individual appointed to produce the risk assessment will be a competent person who has been appointed by the Chain of Command. The appointed competent person will be qualified, current, experienced and mature in the activity that they have been appointed to assess.
2. **Authorising Officer.** Risk assessments may only be carried out by an appointed person, as directed by the commander, who remains within the Chain of Command and is qualified<sup>51</sup>, current, experienced and mature.
3. **The Process.** The steps to be taken in carrying out a military training risk assessment are:
  - a. Step 1. Identify the hazards associated with the activity.
  - b. Step 2. Decide who or what environment might be harmed<sup>52</sup>.
  - c. Step 3. Evaluate the risks and decide on precautions.
  - d. Step 4. Record your significant findings and implement them.
  - e. Step 5. Review your risk assessment and update as necessary.
4. The risk assessment process is set out in detail below. GRAs for military training activities are also carried out using the process set out below.

### **Step 1**

5. **Describe the activity - The subject of the Risk Assessment.** The activity may consist of one single training practice such as top roping and abseiling, combat driver training or a complex series of events during a course, Regimental Duties or a Joint Service exercise. It is important that the whole scope of the exercise is considered. Describe the activity in Column 'b' of the risk assessment proforma at Appendix 2.
6. **Identify the hazards associated with the activity.** Identify whether all the elements of the SSOT are in place. If they are, record the relevant information in the form of a Range Action Safety Plan or Exercise Action Safety Plan as part of the exercise coordinating instructions or an Annex to the instructions and there is no need for further risk assessment.

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<sup>51</sup> Has completed the ASCen Risk Assessment training package either on-line or through an AFPA and which is valid for 5 years.

<sup>52</sup> While the hazard may well result in a fatal or severe accident, the risk of this occurring may well be Low with the appropriate controls in place. It is essential only Competent persons are tasked to complete a risk assessment as the determination of risk for matters not covered by the SSOT must be subjective relying on the knowledge, skill and experience of the assessor, in addition to any relevant qualification.

## Step 2

7. Decide who or what environment may be harmed. If they are not all in place, identify if there are any hazards not covered by the SSOT. Six factors should be considered in the identification of hazards:

- a. People - military, controlled personnel and the public.
- b. Equipment.
- c. Material – ammunition, food, water, fuel, etc.
- d. Procedures.
- e. Environment - the most important factors are likely to be climate, weather and terrain<sup>53</sup>.
- f. Relevant Service publications, drills, practices and instructions.

8. List the hazards in Column 'c' of the risk assessment proforma at Appendix 2.

## Step 3

9. **Assess the level of risk.** Record the assessed level of risk in Column 'd' of the risk assessment proforma.

## Step 4

10. **Identify any existing controls.** Existing controls are in the main to be found in the close observance of drills and instructions laid down by the Service authorities, by Range Standing Orders, by site specific risk assessments, or in GRAs. Existing controls should be listed in column 'e' of the risk assessment proforma with all control measures put into the exercise instruction / coordinating instructions; thus, linking the risk assessment to the exercise direction.

## Step 5

11. **Identify any residual risk.** Considering the hazards identified and the existing controls, decide whether there is any residual risk remaining and whether that risk is 'Acceptable' (the risks are adequately controlled) or 'Not Acceptable' (the risks are not adequately controlled).

12. Answer the question 'Is the residual risk acceptable?' Enter Yes or No in Column 'f' of the risk assessment proforma. Complete steps 6 & 7 as per page 4-C-1

13. If the answer is Yes, then the risk assessment needs to be reviewed and further controls identified prior to sign off.

14. If the answer is No, the risk assessment should be signed and dated by the Exercise Director who has directed the activity to take place.

15. The completed and signed risk assessment should be kept with the appropriate activity planning documentation and review periodically, or if the situation/circumstances change.

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<sup>53</sup> This also includes Environmental Hazards – vector borne diseases, asbestos (prevalent in some African countries) etc.

**MILITARY ACTIVITY RISK ASSESSMENT PROFORMA  
(SAFETY IN MILITARY TRAINING, ON EXERCISES AND OPERATIONS)**

Unit/Formation:  
Activity/Exercise:  
Relevant Publications/Pamphlets/Procedures:  
Steps relate to Risk Assessment Process

Assessor:  
Date Assessment:  
Review Date:  
Generic Risk Assessment:  
Yes/No

Ser	Activity / Element (Step 1)	Hazards Identified (Step 2)	Risks Identified (Step 3)	Existing Control (Step 4)	Is Residual Risk Acceptable (Step 5)	Additional Controls Required (Repeat Step 4)	Is Residual Risk Acceptable (Repeat Step 5)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)

Authorising Officer	Name	Post	Date	Signature
Existing and Additional Controls Agreed				
Additional Controls Implemented				

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**SAFETY IN MILITARY TRAINING, ON EXERCISES AND OPERATIONS  
MILITARY ACTIVITY RISK ASSESSMENT PROFORMA – EXAMPLE**

Unit/Formation:	45th Field Regiment Royal Artillery	Assessor:	WO2 Cox
Activity/Exercise:	Summer Mountaineering - Trekking in Nepal	Date of Assessment:	21 Apr 19
Relevant Publications/Pamphlets/Procedures:	JSP 375, 419, AGAI 11 & 18 & Unit SOPs.	Review Date:	21 Apr 19
Steps relate to Risk Assessment Process		Generic Risk Assessment: Yes/ <del>No</del>	Yes

Ser	Activity (Step 1)	Hazards <sup>54</sup> Identified (Step 2)	Risks <sup>55</sup> Identified (Step 3)	Existing Controls <sup>56</sup> (Step 4)	Is Residual Risk Acceptable (Step 5)	Additional Controls Required (Repeat Step 4)	Is Residual Risk Acceptable (Repeat Step 5)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1.	Driving - UK	1. RTA	Low	1. Compliance with JSP 800. 2. Driving will only take place in the UK. 3. Logistical company will arrange transport in Nepal.	Yes		
2.	Driving – Nepal	1. RTA	Med	1. Travel only in private vehicles hired and driven by logistical company. 2. Avoid public transport. 3. Avoid travelling at night. 4. Only proven competent drivers employed.	Yes		
3.	Political instability	1. Riots 2. Civil unrest 3. kidnap/abduction	Low	1. Exped authorised by FCO. 2. All members receive brief from FCO. 3. remain current with political situation. 4. Always remain in groups of 3 in built up areas.	No	1. Remain in contact with FCO. 2. Take advice from logistical support company and local guides.	Yes/Low

<sup>54</sup> Something with the Potential to cause harm.

<sup>55</sup> Likelihood that harm will occur and its consequences.

<sup>56</sup> An item, procedure or system introduced to eliminate or reduce risk.

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4.	Theft	1. Loss of exped equipment 2. Loss of personal equipment 3. Loss of cash	Med	1. Equipment always secured. 2. Equipment never left unattended. 3. 2 pax minimum stay with equipment. 4. Group equipment insurance. 5. Personal insurance.	Yes		
5.	River Crossing	1. Drowning 2. Entrapment 3. Head Injuries	High	1. The crossing of water that is deeper than 'wade-able water' will not be undertaken. 2. Current speed always confirmed before entry. 3. Local knowledge always consulted first.	Yes		
6.	Environmental Health	1. Food poisoning and subsequent illness	Med	1. Those cooking on the trek are to observe the highest hygiene. 2. Those feeling poorly are not to cook. 3. Thorough cleaning of all cooking and feeding equipment. 4. Bottled, filtered or boiled water only.	No	1. Maintain hygiene checks. 2. Early intervention.	Yes/Low
7.	Infectious Diseases	1. Malaria 2. Rabies	Med	1. Relevant inoculations pre-departure. 2. Advice from EHT at Sp Comd. 3. HRR Assessment.	Yes		
8.	Accidents and incidents in built up areas	1. Accidents/injuries 2. Re-occurring medical issues	Med	1. All MFD prior to departure from UK. 2. A stock of repeat prescriptions to be carried. 3. Exped insurance required. 4. Contact with FCO. 5. All participants to be 1 <sup>st</sup> Aid Trained. 6. Carry 1 <sup>st</sup> Aid equipment.	Yes		
9.	Accidents and incidents whilst trekking	1. Accidents/injuries 2. Re-occurring medical issues	Med	1. All participants to be 1 <sup>st</sup> Aid trained. 2. Exped insurance with emergency evacuation cover to be purchased. 3. Prearrange comms through logistical company. 4. Have JCCC details. 5. All participants know the evac procedure. 6. Inform FCO ASAP. 7. Satellite phone to be carried. 8. Carry 1 <sup>st</sup> Aid equipment.	No	1. Comms may fail dependent on location and signal strength. Establish emergency comms failure cut-off plan.	Yes/Low.
10.	Environmental Dangers	1. Monsoon rains 2. Flooding 3. Landslides 4. Avalanches	Low	1. Take advice on dates from FCO. 2. Take advice from logistical company. 3. Avoid monsoon season. 4. Effective route planning.	Yes		
11.	Trekking -Altitude Sickness	1. AMS 2. HAPE 3. HACE	High	1. Adhere to DIN on altitude. 2. Appropriate acclimatisation plan. 3. Climb high, sleep low. Fluid intake. 4. Altitude medication to be carried. 5. All participants briefed on altitude sickness prior to departure and in theatre. 6. Use Lake Louise scorecard. 7. Buddy system.	No	1. Maintain acclimatisation plan Maintain accompanied descent capability always.	Yes/Low

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12.	Trekking -Climatic Issues	1. Hypothermia 2. Hyperthermia 3. Sunburn 4. Non-freezing cold injuries	Med	1. Compliance with JSP 539. 2. Educate all participants. 3. Appropriate clothing. 4. Appropriate PPE (glasses, sun cream). 5. Hydration. 6. The ability to recognise the signs and symptoms. 7. Buddy-Buddy system.	No	1. Observe weather patterns. 2. Observe work rate during activities 3. Introduce regular physical checks as likelihood of occurrence rises 4. Introduce 5. Maintain accompanied descent capability always 6. Ensure early treatment intervention	Yes/Low
13.	Trekking – Exposure to height	1. Panic attacks	Low	1. Instructors to beware of the emotional response that can occur amongst those individuals exposed to height activities.	No	1. Always remain vigilant and be aware of the appropriate coping strategies	Yes/Low
14.	Trekking – Environmental impact	1. Overcrowding	Low	1. Communicate where required with other group leaders. 2. Confirm & de-conflict routes. 3. Share best practice.	No	1. Always remain vigilant of other users 2. Active de-confliction action	Yes/Low
15.	Trekking – Student competency	1. Student incompetence	Low	1. All participants to achieve SMF prior to departure from UK. 2. Close supervision. 3. Mutual / peer support.	Yes		
16.	Trekking	1. Group separation	Low	1. All participants to be closely supervised at all time 2. Separation is prohibited at all times (less real-life emergencies)	Yes		
17.	Steep ground	1. Falls from height	Med	1. Identification of potential fall sites (holes, drops, edges and similar). Continuous observation and briefing.	Yes		
18.	Trekking	1. Benighted	Low	1. All personnel carry issued and serviceable head torches. 2. Head torches are checked prior to issue. 3. Everyone to carry replacement batteries and cylumes	Yes		
19.	Trekking – Wild camping	1. Attack from wild animals	Low	1. Be aware that wild animals do exist in Nepal 2. Beware and avoid wild dogs 3. Seek advice from FCO	Yes		
20.	Trekking	1. Muscular and skeletal injuries	Med	1. All participants are to be mountain 1 <sup>st</sup> Aid trained and in date 2. All participants are to be conversant with the evacuation plan 3. Instructors are to carry a suitable 1 <sup>st</sup> Aid kit and satellite mobile phone	Yes		
21.	Trekking	1. Metrological influences	Med	1. Observe weather forecast and adjust travel where appropriate. 2. Obtain weather reports using logistical company.	No	1. Forecasting remains a priority. 2. Continuous observation and recording. 3. Early intervention	Yes/Low

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22.	Fire	1. Cooking	Med	1. No smoking in tents. 2. Cooking will be centrally focused. 3. No cooking in sleeping tents.	Yes		
<b>Authorising Officer</b>		<b>Name</b>		<b>Post</b>		<b>Date</b>	<b>Signature</b>
<b>Existing and Additional Controls Agreed</b>		A D Neale		2IC, 45 <sup>th</sup> Field Regiment Royal Artillery		1 Apr 19	<i>Original must be Signed</i>
<b>Additional Controls Implemented</b>		A D Neale		2IC, 45 <sup>th</sup> Field Regiment Royal Artillery		1 Apr 19	<i>Original must be Signed</i>

## CHAPTER 5

### LAND<sup>57</sup> EQUIPMENT SAFETY MANAGEMENT

#### Introduction

1. This chapter describes the roles and activities delivered within Army HQ to deliver and support equipment system safety across the Army TLB. This chapter is endorsed by the Land Equipment Safety Officer (LESO).

#### Part 1

#### Management of Capability

2. Capability is defined in the AOM<sup>58</sup> as the enduring ability to deliver an effect or outcome that is relative to the threat, the environment and the coalition contribution (source: *UK MOD Knowledge in Defence*). The ability to achieve a strategic or campaign level effect or end state in the context of defence planning (source: *Capability Management Practitioners' Guide*). In the Army, capability is used to describe all capability: ie Military Capability, Personnel Capability, Information Capability, etc. Land Military Capability (Land MILCAP) describes specific Land 'generated force' capabilities such as Air Manoeuvre or Dismounted Close Combat. Army HQ leads the development of capability strategy and planning through the Capability Management Sub Strategy lead by D Cap. Capability Sponsors provide the long-term, through-life proponentcy and conscience for specific capabilities and sit within the Heads of Capability (HoC).

#### Roles and Responsibilities

3. **D Cap.** D Cap retains ownership of Capability Safety Management, which he discharges through the HoCs. D Cap is responsible for:

- a. Co-ordinating the development of prioritised capability change initiatives/ Courses of Action (COA) to define the Army portfolio.
- b. The identification of Senior Responsible Owners (SRO), overseeing through life capability sponsors for generated force capabilities; acts as the lead Training Requirements Authority for Army Training.
- c. Co-ordinating the delivery of Capability safety management and assurance.
- d. Ensuring that capability risks are identified and managed at the appropriate level.

4. **Land Equipment Safety Officer (LESO).** LESO is the principle safety officer within Directorate Capability and is responsible for:

- a. To manage assurance of capability not sponsored by D Cap.
- b. Provide safety advice and guidance to the Chain of Command on the implementation of training safety (whilst remaining cognisant of the need to allow the necessary freedom of action to prepare for operational activity).

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<sup>57</sup> LAND refers to the Land Domain.

<sup>58</sup> The Army Operating Model v2.0 dated Apr 16.

- c. Chair the Land Safety Working group (LSWG).
  - d. Is the Army TLB lead for the Land Exemptions Committee (LEC).
  - e. Is the Army TLB lead for Whole Body Vibration (WBV) and Noise Induced Hearing loss (NIHL) and chair of the respective working groups.
  - f. The process for the transfer of risk between platforms and integrated systems.
  - g. The process for monitoring and reporting risks held by D Cap.
5. **Safety Case Management Team(SCMT).** The SCMT are responsible for:
- a. Providing Safety and Environmental Protection (S&EP) advice to stakeholders to ensure equipment operation and maintenance policy is compliant with UK law and MOD policy.
  - b. Liaison with relevant stakeholders such as DE&S, LESO(A), D Eqpt, Eqpt Ops, CE(A), CS(A) and Fleet Manger SMEs for the content and production of Safety Notices via Email (SNvE) and the process for the distribution of SNvE across the Army TLB and other equipment users in RN, RAF and JFC.
  - c. Monitoring the safety data for all Land systems sponsored by the Capability Directorate in conjunction with DE&S and the ASCen.
  - d. The assurance audit plan for the safety management for all D Cap capabilities.
  - e. Monitoring all safety recommendations that affect D Cap sponsored equipment including DLSR and DAIB investigation reports.
  - f. Leading the management of capabilities that are in service, but not supported by DE&S.
  - g. Represent D Cap Desk Officers at safety meetings and provide SME safety advice to equipment trials when required.
6. **HoCs.** The HoCs are responsible for coordinating Capability Safety Management activity (attendance at safety meetings, sign off Part 3 safety cases, etc) for those capabilities which have been assigned to them<sup>59</sup>. The HoCs may call upon military staff SQEP within D Cap to help conduct Capability Safety Management activity. Support for safety activity is to take priority over other tasks<sup>60</sup>.
7. HoCs are responsible for:
- a. Developing suitable plans and processes that must then be implemented to address risks and issues that may impact the delivery of an overall capability. To do this they must review the risks and issues in and across each of the Defence Lines of Development (DLoDs)<sup>61</sup>. The HoC responsibilities include setting HS&EP requirements during the planning stages of a capability's life and ensuring that these are met throughout a capability's life. They must ensure that capability can be fielded safely, and that suitable and sufficient training exists for the capability at all times throughout its service life. This, when

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<sup>59</sup> Capability safety ownership is set out in the [Equipment Safety Matrix Improved \(ESMI\)](#).

<sup>60</sup> Meeting between D Cap and D Sp to discuss safety management on 26 Oct 16.

<sup>61</sup> It should be noted that the equipment DLoD is specifically managed by D Eqpt (on behalf of D Sp) and his staff are organized to support HoCs.

combined with the various elements from other DLoDs, allows the user to apply a robust Safe System of Work<sup>62</sup>/Training.

b. Working with stakeholders across all DLoDs and in conjunction with the relevant DE&S Delivery Team Leaders (DTL), in order to:

- (1) Identify safety requirements for new capabilities during Project Start-up/Project Foundation (PSPF). This task needs to be performed in conjunction with the relevant Duty Holders (ODH/DDH)<sup>63</sup>.
- (2) Direct the safety requirements in a capability's User Requirements Document (URD), consulting safety specialists as necessary, so that the Secretary of State's policy is met<sup>64</sup>.
- (3) Ensure that the requirements of MOD safety policy are met throughout the project. This task needs to be performed in conjunction with the relevant Duty Holders<sup>65</sup> during the latter stages of the procurement cycle ie towards in-service acceptance.
- (4) Provide appropriate detail of the safety requirements for inclusion in the Systems Requirements Document (SRD).
- (5) Ensure that safety risks are identified and managed such that they are ALARP and either broadly acceptable or tolerable. This task needs to be performed together with the DTL.
- (6) Ensure that risk controls and mitigating measures, across the DLoDs, are implemented in a timely manner. Appropriate details of the implementation of these controls must be passed to the Delivery team (DT) project staff such that they can document it in support of their Safety Case audit trail.
- (7) Ensure that periodic review of the standards and policy for the operation of their respective capabilities is conducted. This shall include a review of the equipment hazard log and verification that the mitigation (controls) are still appropriate, particularly following any upgrade programmes; assurance is to be provided annually to D Cap, copied to the DTL.
- (8) Ensure that appropriate User Representative(s) attend DE&S Safety Panels (SP)/Safety Committees, to provide effective communication of user feedback. User representatives must complete the System Safety Awareness online training prior to attendance to ensure the overall SQEP of the panel.
- (9) Staff Dispensations where an equipment or platform requires to be operated outside of the endorsed Safety Case<sup>66</sup>. Initial details will be provided by the Chain of Command/PJHQ. The staffing process must include advice as necessary, provided by the CE(A) and Safety Assurance Team within Eqpt Dir as well as advice from training staff.
- (10) Engage as required, with those undertaking accident/incident investigations.
- (11) Staff exemption cases in conjunction with DTs through to the Land Exemption Committee.

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<sup>62</sup> Safe Place, Safe Person, Safe Equipment, Safe Practice.

<sup>63</sup> Risk to Life (RtL) activities only.

<sup>64</sup> DSA 01.1.

<sup>65</sup> Risk to life (RtL) activities only.

<sup>66</sup> Refer to [DSA03.DLSR.LSSR - DCoP](#) for detail of the Op Dispensation process.

(12) Staff risk referrals as necessary.

c. Ensuring that Equipment and Training Safety Policy is compliant with the direction in this ACSO, other MOD Policy that is applicable and current legislation.

d. Ensuring that procedures and policy are reviewed as a result of recommendations, whether by Defence Accident Investigation Branch (DAIB), Service Inquiry (SI) or external reports, are promulgated to the Chain of Command and implemented.

e. Ensuring that Training Policy staff are proactive in keeping abreast with DT equipment modifications and the potential issues arising from either change of concept, change of use, change of user requirement or change of equipment modification state. This includes the development of Safety Notification via E-Mail (SNvE) in accordance with DE&S policy<sup>67</sup>, following consultation with CE(A), D Eqpt, Eqpt Ops and relevant Fleet Manager SME.

f. Providing the ACAI function to carry out the following:

(1) Act as the HS&EP advisor to ensure equipment operating and maintenance policy is compliant with UK law, MOD policy and the policy contained in the statement set out by the Secretary of State.

(2) Ensure that Training Policy is suitable and sufficient to deliver capability safely.

(3) Provide safety advice to the Chain of Command on the implementation of Training Safety, whilst remaining cognisant of the need to allow the necessary freedom of action to prepare for operational activity.

(4) As required, act as a member on equipment SP/Safety Committees and when required chair/attend meetings such as the Capability Working Group/Capability Integration Group, Capability Integration Working Group (CIWG)/Availability Working Group (AWG) and LSSOWG.

(5) Liaison with ASCen and the Army Inspectorate.

(6) Ensure that the periodic review of Part 3 Safety and/or environmental Safety Case Reports and Hazard Logs are being appropriately managed by DTs.

(7) Provide SME safety advice to equipment trials from a Front-Line Command perspective.

(8) Review adverse event investigations to provide information for both good practice and lessons learned processes.

(9) Conduct event reviews to seek and learn safety lessons, distributing good practice guidance and safety procedures.

8. **D Sp.** D Sp Develops the Army Support Sub-Strategy (in conjunction with D Strat and D Cap) and sets associated policy; Leads the Support Sub-Portfolio and performance manages the change programmes/projects (pan-DLoD) within it. Delivers equipment, logistics and materiel to field forces. Conducts through-life support planning for equipment and logistics; is the Army's Intelligent Customer with external providers of Equipment, Logistics, associated Services and Support; sets and manages the Army's requirement with DE&S in the Command Acquisition Support Plan (CASP) and leads the relationship with Babcock on behalf of Defence.

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<sup>67</sup> [Safety Notice Via Email \(SNVE\)](#).



9. **D Info.** D Info is responsible for ensuring that the Intelligence and Royal Signals Requirement Setting Teams<sup>68</sup> are proactive in keeping abreast with DT equipment modifications and the potential issues arising from either change of concept, change of use, change of user requirement or change of equipment modification state.
10. **D Comd JHC.** D Comd JHC informs requirements setting for current and future capability, stands up Business Change Managers (BCMs), realises the benefits of change investment and supports in-service management for Army aviation including UAVs.
11. **Commander Home Comd (Comd HC).** Comd HC informs requirements setting for current and future capability, stands up Business Change Managers (BCMs), realises the benefits of change investment and supports in-service management within his AoR.
12. **Commander Field Army (CFA).** CFA Commands the Field Army's capabilities, informs requirements setting for current and future capability, stands up Business Change Managers (BCMs), realises the benefits of change investment and supports in-service management.
13. **Director Land Warfare (DLW).** DLW, through AH Training Plans who acts as the Training Requirements Authority (TRA), is responsible for ensuring that the seven Requirement Setting Teams (DCC, MCC, Mil Eng, Jt Effects, Log, ES and Med) are proactive in keeping abreast with DT equipment modifications and the potential issues arising from either change of concept, change of use, change of user requirement or change of equipment modification state.

## Part 2

14. **Defence Lines of Development (DLoDs).** The purpose of a DLoD is to promote coherence within Defence Capability by providing policy, strategy, rules, guidance and advice on the range of factors that need to be considered by Army HQ governance bodies when making decisions, both on change and in generating force elements (FEs) in business as usual (BAU). DLoD lead are shown in the table below:

DLoD	ECAB 2* Lead	1* Lead
Training Capability	D Cap	HoC Trg
Equipment	D Sp	Hd Eqpt
Personnel	D Pers	Hd Pers Cap
Information	D Info	Hd CSD
Concepts & Doctrine	D Strat	Hd Strat
Organization	D Strat	Hd Strat
Infrastructure	DB&I	Hd Infra Plans
Logistics	D Sp	Hd Log
Safety Management	D Cap	LESO

15. **SRO.** The SRO role is defined as the single individual with overall responsibility for ensuring that a project or programme meets its objectives and delivers the projected benefits. The SRO is personally responsible for cross-DLoD integration up to IOC, ensuring all DLoDs are orchestrated to achieve programme outcomes and deliver operational capability into service. At the point of handover into service, this responsibility will be transferred to the In-Service Manager. The SRO will also:

- a. Oversee all aspects of programme delivery to ensure that it is successfully implemented with the required outcomes delivered to the agreed Performance, Cost and

<sup>68</sup> Formerly Training Development Teams (TDT).

Time (PCT), that risks are managed, and the potential of the change or capability is fully exploited.

b. Setting up appropriate programme governance arrangements including: establishing and chairing the Programme Board and seeking appropriate assurance that the Programme risk management, control and governance is appropriate and effective.

c. The SRO is responsible for declaring when Initial Operating Capability (IOC)/Full Operating Capability (FOC) has been attained, in conjunction with the end user/ BCM.

16. **BCM.** The role of the BCM during each phase of the programme lifecycle is as follows:

(a) During Programme Identification/Programme Definition, the BCM will provide advice on requirements generation, Mandate development (especially definition of IOC, FOC and expected handover points) and expected benefits.

(b) Initially attend the CIWG and provide advice to the Programme Manager on the integration of the change/capability into Business as Usual (BaU). From the point at which the Programme Manager transfers Chair of the CIWG to the BCM, the BCM will take the lead on integrating the change into BaU.

17. **Programme Delivery and Integration.** The SRO leads and directs each change programme and will chair a Programme Board (PB) to oversee and direct delivery of the programme. The PB is to be attended by the project leads, SME, DLoD representatives and the BCM (when required).

18. To facilitate integration of change activity into BaU, the SRO is supported by a regular Capability Integration Working Group (CIWG) – which has agreed terms of reference, governance, frequency, attendance, agenda and ways of working. The CIWG supports the SRO by providing advice, guidance and planning input on integration, but is not a formal sub-group of the programme. The CIWG is initially chaired by the Programme Manager (on behalf of the SRO) with the Chair transferring to the BCM at an appropriate point.

19. Army HQ supports the test, evaluation and acceptance of capabilities in to service. Each Programme Manager is responsible for gathering the evidence and analysis to demonstrate that the capability generated meets the acceptance criteria.

### **Safety Case Management (SCM)**

20. A Safety Case<sup>69</sup> is defined in Def Stan 00-056 as “*a structured argument, supported by a body of evidence that provides a compelling, comprehensible and valid case that a system is safe for a given application in a given operating environment*”. A simple way of understanding the safety case is to consider five basic questions:

- **What are we looking at?** (System description)
- **What could go wrong?** (Hazard identification and analysis)
- **How bad could it be and what are the major threats?** (Risk estimation)
- **What has been or can be done about it?** (Risk evaluation, risk reduction and acceptance to ALARP and tolerable)

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<sup>69</sup> MOD, An Introduction to System Safety Management in the MOD, Part II, System Safety in MOD Acquisition, Issue 4 – 2018 (The White Book).

- **What if it happens?** (Emergency and contingency arrangements)

The safety case should answer these questions for the whole system under consideration and for the uses defined. Safety cases should be proportionate to the risks which the system poses. Understanding the major hazards will help to determine the scale and complexity of the required safety case. Therefore, preliminary hazard identification and analysis should be done early in the project lifecycle to scope the activities and resources needed to build the safety case.

21. In **MOD** terminology the '**safety case**' is the body of evidence: a comprehensive and structured document or set of documents. It usually includes evidence in test results, detailed safety analysis, modelling, expert judgement etc. The safety case provides an audit trail of safety considerations from requirements through to evidence of compliance and risk control. It gives the traceability of why decisions have been made and how they have been validated. The safety case develops during an equipment lifecycle and will typically be summarised in safety case reports at the end of each phase or prior to each major decision point.

22. The management of Safety Cases is a through life activity and, for Land equipment systems, requires a co-signatory between DE&S and the Army at Part 3 to ensure that the user understands the any limitations on operational capability and the safe use of the capability (safety envelope<sup>70</sup>). The current system for the management of Safety Cases is under review and therefore this ACSO reflects the interim process. The outline of Land equipment systems SCM is superimposed on the CADMID cycle at Annex A.

23. Equipment modified without DT endorsement takes that equipment outside of the Safety Case and it can therefore **no longer** be considered safe by design. Personnel who have implemented the unauthorised modification are responsible and culpable for all associated risks and any legislative non-compliance, due to that unauthorised modification. Units must adhere to the policy on Configuration Management, particularly on Land In-Service Local Modifications<sup>71</sup>.

24. The Part 3 Safety Case sets out the argument for in-service (Operation and Support) S&EP compliance for a capability. It is developed and maintained by the DT but is formally owned by the HoC on behalf of the Front-Line Command (FLC)<sup>72</sup>.

25. The End User who is charged with operating<sup>73</sup> the capability is to comply (or be able to explain otherwise) with the direction given in the Safety Case. The End User will not necessarily see the Safety Case or Safety Case Report (SCR), however direction will be articulated through the risk controls ie in user documentation, training, warnings and cautions etc.

26. DE&S CEO will delegate safety responsibilities, through the relevant CoM, to demonstrably competent individuals in the organisation. Safety responsibilities include the authority to sign-off, on behalf of DE&S, a systems Safety and/or Environmental Case Report – a report that summarises the arguments and evidence of the Safety and/or Environmental Case, documenting the progress against the safety and/or environmental programme.

27. D Cap delegates authority for ownership of the Part 3 Safety Case (Operation and Support Safety) on behalf of the FLC to his HoC in accordance with the D Cap Responsibility Matrix. To provide through life management of capability, each HoC establishes a CIWG<sup>74</sup> whose chief purpose is to ensure all DLoDs are fully matured prior to the capability's In-Service Date (ISD). DLoD leads help develop evidence to support the Safety Case by implementing risk controls such as establishing a training package for the user and the maintainer. The DT Safety Manager

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<sup>70</sup> This is a regulatory requirement.

<sup>71</sup> Details contained in the Defence Logistics Framework (formerly JSP 886).

<sup>72</sup> DG Capability/4/5/10 dated 6 Jul 12.

<sup>73</sup> In this case this will be the Commanding Officer (DDH).

<sup>74</sup> A CIWG may include many or single capabilities and is tailored by the HoC according to resource available and the type and stage of the capability in question.

reports Safety Case development progress<sup>75</sup> against milestone events<sup>76</sup> through the equipment DLoD representative at the CIWG.

28. At ISD, the HoC as the designated capability sponsor, liaises with D Sp's 1\* directorates to identify the chair for the AWG. The AWG predominantly manages the equipment, training and logistics DLoDs although the CIWG remains responsible for endorsing safety decisions through life, and may also need to reform to manage capability upgrades, operational dispensations etc.

29. **Part 3 Safety Case Endorsement.** The Part 3 Safety Case Endorsement/Review process is shown at Annex B<sup>77</sup> with an example template at Annex C. Prior to ISD, or at annual review date, the DT Safety Manager notifies the appropriate CIWG/AWG of the intention to review and endorse the Part 3 Safety Case. The DT Safety Manager completes Parts 1 to 4 and then submits the template to the CIWG secretary<sup>78</sup> seeking supporting DLoD and HoC statements.

30. On receipt, the CIWG Secretary: notifies the CIWG/AWG chair and HoC Safety Advisor<sup>79</sup>; identifies DLoD leads (by Organization) and the relevant Lead User (HoC) staff in order to obtain necessary supporting safety statements. The CIWG Sec then completes Parts 5, 6a, 7 and 8 of the template.

31. DLoD leads are to provide the CIWG/AWG Secretary with a statement confirming, or otherwise, that the risk controls are suitable and sufficient and remain in place. The HoC is to provide the CIWG/AWG secretary with a statement confirming, or otherwise, that the equipment is being used as intended and that limitations of use are identified and in place. To assist the Safety Case review process, they provide supporting statements appropriate with the complexity and stage of the programme. It is likely that there will be more verification and validation activity prior to ISD, and that evidence may be substantial as the Project matures (for example through trend analysis) after ISD. Therefore, the statement is most likely a tailored summary of the DLoD/AWG activity. This is also an opportunity for the CIWG/AWG Chairman to better understand and become familiar with the current issues surrounding the capability. In consultation with the DT Safety Manager, it will allow them to advise better the DLoD leads on the end product required. The CIWG/AWG Secretary is to complete Part 6b and return the e-template to the DT Safety Manager.

32. Once the supporting statements have been provided to the DT Safety Manager, the latter will gather all other necessary evidence, set the agenda for the review of the Safety Case and convene a SP/Safety Committee to review the SCR. Where the evidence suggests that greater than normal visibility is required by the CIWG/AWG Chair, in order to prevent unnecessary delay and duplication of effort, the CIWG Chair is to attend the SP/Safety Committee. Normally, the Advisory Statement can be supported through engagement with the HoC who will attend the SP/Safety Committee. Reviews will include the:

- a. Impact of any requirement changes.
- b. Impact of any legislative changes.
- c. Impact of any incidents, accidents or failures.
- d. Whether there has been a change in use of the capability.
- e. Assessment of assurance reports from the HoC.

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<sup>75</sup> Production of the Part 1, 2 and 3 SCR.

<sup>76</sup> Initial Gate, Main Gate, In Service Date and annual review.

<sup>77</sup> Legacy equipment may not have been subjected to the CIWG process.

<sup>78</sup> If CIWG is not known, the template should be submitted to the HoC's Capability Single Point of Contact (SPOC) or the Safety SPOC.

<sup>79</sup> Legacy equipment may not have been subjected to the CIWG process. If CIWG is not known, the template should be submitted to the HoC's Capability Single Point of Contact (SPOC) or the Safety SPOC if not already aware.

- f. Assessment of maturity statements from DLoDs.

33. Having gained SCR approval, the DT Safety Manager archives all the supporting evidence, and adds links to these on the template before submitting the completed template<sup>80</sup> to the DTL for Part 3 SCR endorsement and to the CIWG Secretary for HoC endorsement<sup>81</sup>. The CIWG Chair assesses the evidence, cognisant that the SP/Safety Committee has already approved the SCR. The Chair in making their recommendation to the HoC<sup>82</sup> via an advisory statement reports whether:

- a. The Chair has/has not undertaken Systems Safety in Action training and is SQEP in accordance with ACSO 3216.
- b. All DLoDs have/have not provided supporting statements that risk controls are in place.
- c. The HoC has/has not provided supporting statements that the equipment is being used as intended and all limitations of use have been identified and restrictions in place.
- d. The SP/Safety Committee has approved the SCR.
- e. The HoC was/was not represented was/was not SQEP and attended the SP/Safety Committee.
- f. The HoC Safety Advisor has/has not been consulted (where necessary).

34. Following HoC signature, the endorsed SCR is returned by the CIWG Secretary to the DT Safety Manager for retention.

35. The SP/Safety Committee is the forum through which the DT Safety Manager manages safety, including the development of the Part 3 SCR and Hazard Log. The aim of the Part 3 Safety Case review is to demonstrate that the residual risk is ALARP and tolerable. It should demonstrate that<sup>83</sup>:

- a. The maintenance policy and arrangements meet the system(s) requirements.
- b. The training policy and arrangements meet any stipulated system(s) requirements.
- c. Operating documentation is available that identifies any procedures for the acceptably safe operation of the system.
- d. Limitations of use are identified, and any safety related restrictions have been imposed on the operation of the system.
- e. Emergency and contingency arrangements are identified and in place.
- f. Arrangements are in place for monitoring safety performance and maintaining the Safety Case.
- g. Resources are in place to maintain the acceptably safe operation of the system through life and these are identified to the SP/Safety Committee.
- h. Matters that cannot be resolved by the SP/Safety Committee must be raised to the CIWG for resolution.

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<sup>80</sup> All reference links are to be established as Records.

<sup>81</sup> HoC may determine the appropriate level for endorsement of SCR based on risk posed by capability.

<sup>82</sup> Or delegated appointment.

<sup>83</sup> [DSA02.DLSR.LSSR](#): Land System Safety and Environmental Protection – Directive and [DSA03.DLSR/LSSR](#): Land System Safety and Environmental Protection – Defence Codes of Practice.

36. The HoC represents<sup>84</sup> the FLC on SP/Safety Committees. After the Part 3 SCR has been approved by the SP/Safety Committee, it is submitted to the DTL and HoC for their initial joint endorsement at declaration of ISD, and annually thereafter<sup>85</sup>. It does not need to be re-signed each year other than when a significant change occurs that requires an uplift to the Safety Case. If, following joint review, there is no change this should be recorded in the minutes of the SP/Safety Committee to provide the audit trail.

37. **Equipment Risk Referral Process.** The Army's equipment risk referral process is at Annex D.

Annexes to Chapter 5:

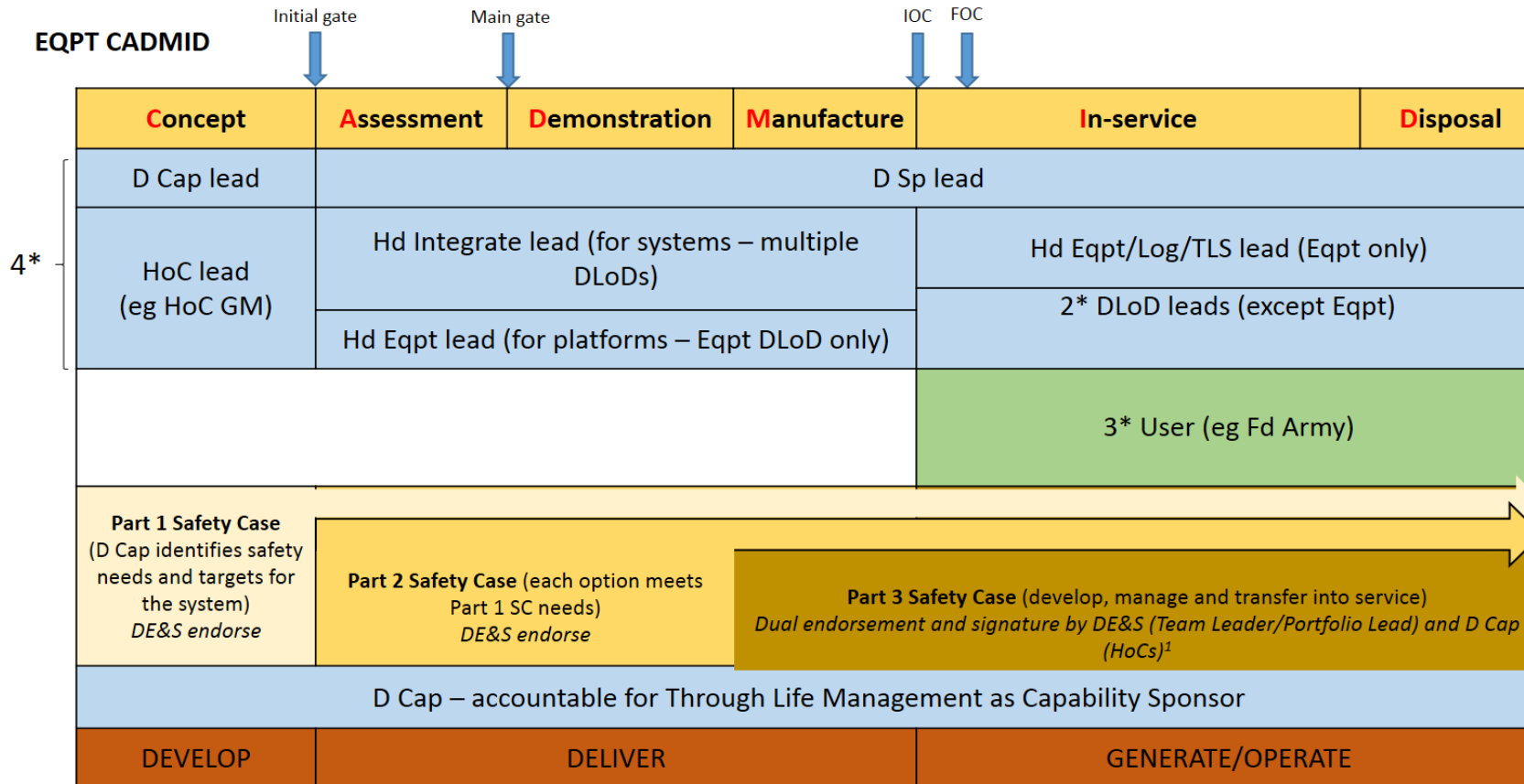
- A. Safety Responsibilities throughout the CADMID cycle.
- B. Part 3 Safety Case Review Process.
- C. Part 3 Capability Safety Case Endorsement e-Template Guide.
- D. Army Equipment Risk Referral Process.

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<sup>84</sup> Or arrange for other empowered representation to attend.

<sup>85</sup> Annually or tailored - see [DSA02.DLSR.LSSR](#): Land System Safety and Environmental Protection – Directive and [DSA03.DLSR/LSSR](#): Land System Safety and Environmental Protection – Defence Codes of Practice.

### Safety Responsibilities Throughout the CADMID<sup>86</sup> Cycle



<sup>1</sup> Only exception – DEOD Capabilities signed off by AH DEODs

<sup>86</sup> CADMID – Concept, Assessment, Demonstration, Manufacture, In-Service, Disposal.

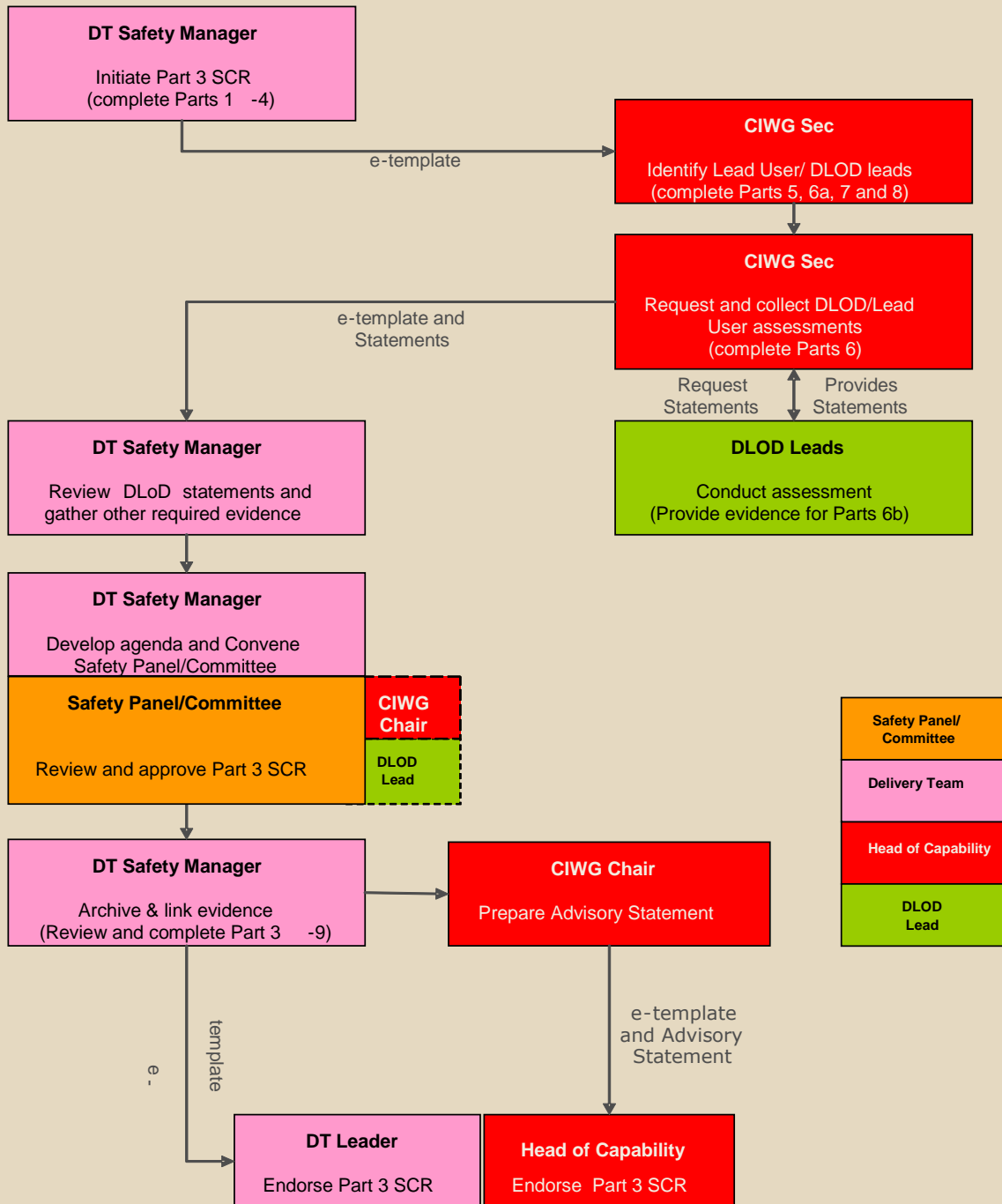
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# Part 3 Safety Case Review Process

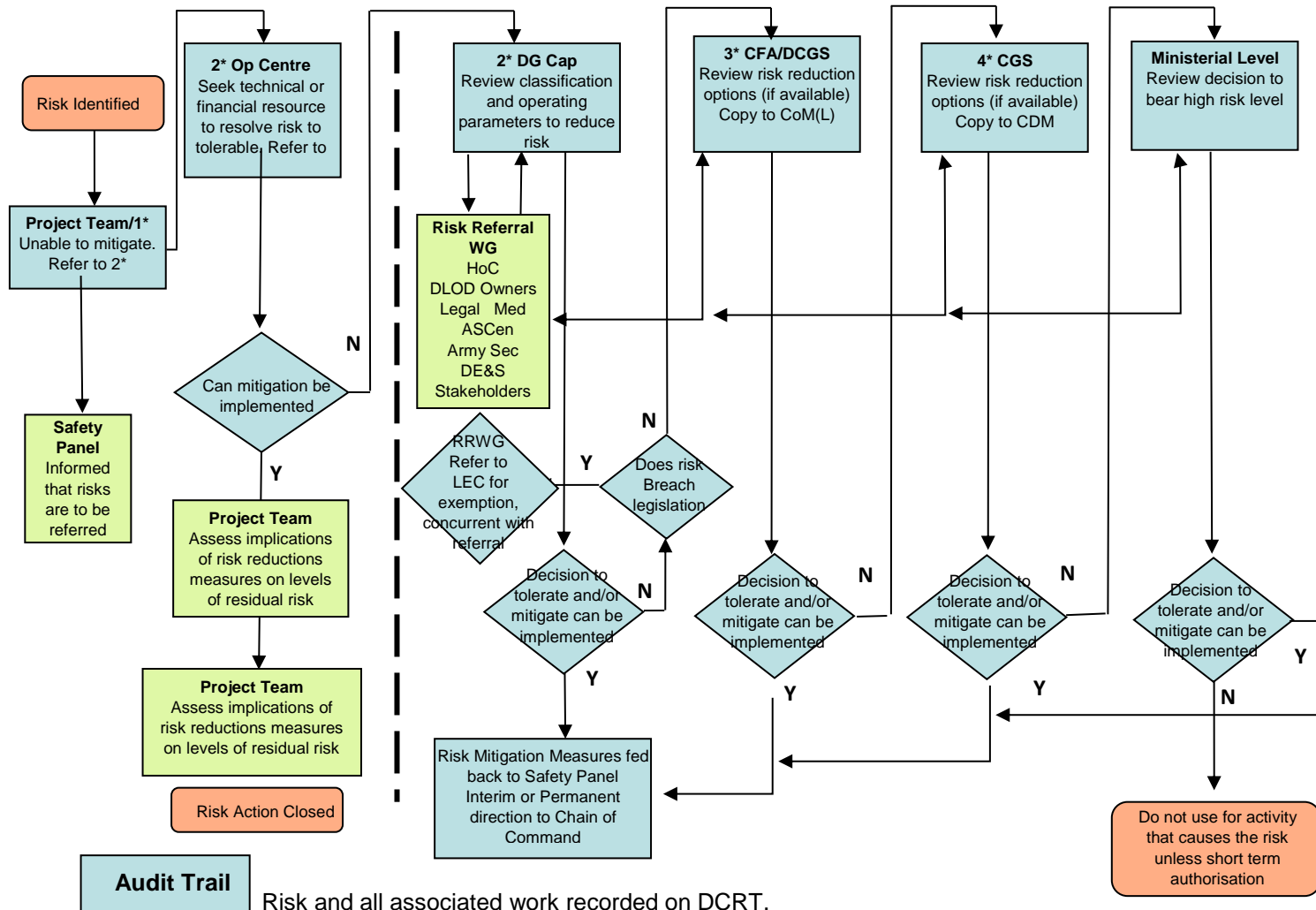


**Part 3 Capability Safety Case Endorsement e-Template Guide**

<b>1. Capability Programme Name:</b>			<b>Last Endorsement Date:</b>	
<b>2. Capability Safety Manager:</b>			<b>Management Delegated Authority:</b>	
<b>3. Safety Environment Management Plan:</b>				
<b>4. Part 3 Safety Case:</b>				
<b>5. CIWG Chairman:</b>			<b>Part 3 Safety Case Ownership Authority:</b>	
<b>6. DLoD Maturity Statements:</b>	<b>6.a CIWG DLoD Owner</b>	<b>6b. Link</b>	<b>Additional Remarks</b>	
<b>Training</b>				
<b>Equipment</b>				
<b>Personnel</b>				
<b>Infrastructure</b>				
<b>Doctrine</b>				
<b>Organization</b>				
<b>Information</b>				
<b>Logistics</b>				
<b>Security</b>				
<b>7. AWG Chairman:</b>			<b>Lead User Delegated Authority<sup>87</sup>:</b>	
<b>8. HoC Supporting Statement:</b>				
<b>9. Safety Panel Part 3 SCR Approval RODs Link:</b>				

<sup>87</sup> Where Lead User receives authority from.

ARMY EQUIPMENT RISK REFERRAL PROCESS



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**Annex D to  
Chapter 5 to  
ACSO 3216  
Dated Apr 19**

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## CHAPTER 6

### ARMY DUTY HOLDING

#### Introduction

1. **Duty of Care.** Irrespective of Duty Holding, Commanding Officers have both a moral and legal responsibility to ensure the safety and well-being of all personnel under their command and others affected by the activities undertaken by their unit's personnel; otherwise known as Duty of Care (DoC). This Duty of Care is principally exercised by ensuring that all activity within the unit is conducted in accordance with an appropriate Safe System of Work/Training (SSOW/SSOT). In addition, the Army has applied Duty Holding to key Risk to Life (RtL).

#### Part 1

#### The Army's Risk to Life Activities

2. The Army Duty Holding construct should only be applied to the following 8 key Risk to Life (RtL) activities which are reviewed bi-annually by the Army Safety Sub Committee (ASSC)<sup>88</sup> and endorsed annually by the Army Safety Committee (ASC)<sup>89</sup> and are overseen by their respective Army Competent Advisors and Inspectorates (ACAI).

3. The Army's RtL activities are:

Ser	Activity	HoC/ACAI
(a)	(b)	(c)
1	All training involving all types of live firing	HoC GM
2	Arduous Army Training	IDev
3	Adventurous Training	ATG(A)
4	Operating / driving military bespoke vehicles	HoC GM & HoC CSS
5	Aviation (including UAVs) – in accordance with Air DH arrangements	HoC Avn
6	EOD (and similar) activity, including Ammunition and Demolitions	Hoc GM & HoC CSS, CATO, IE(A)
7	Military Parachuting (including Display Teams)	Military Parachuting – COS FA Military Display Team – Comd HC <sup>90</sup>
8	Military Diving	HoC GM

4. **Arduous Army Training (AAT).** The Army definition of 'Arduous Army Training' is below with additional guidance at Part 2, Para 29:

<sup>88</sup> Chaired by DCGS – the Army's Safety Champion.

<sup>89</sup> Chaired by CGS – the Army's Senior Duty Holder.

<sup>90</sup> POC Hd A&SDs.

“Land environment training activity that is predominately physical in nature, which due to factors such as intensity, repetition and duration requires a *greater than normal* physical effort. By its nature, the activity has a *greater than normal* degree of risk to life, requiring risk management measures to be taken to reduce the risk to ALARP and tolerable. In this context, *normal* means those activities and risks routinely experienced in barracks during the working week.”

5. Commanders' are to ensure that **all** individuals have achieved MATT2 standard for their cap-badge/role prior to participating in Army Arduous Training (AAT)<sup>91</sup> alongside any other guidance on fitness standards from the host unit.
6. **Adventurous Training.** Comd ATG(A) sees value in retaining DH in the Army as a tool for enhanced safety management of Adventurous (Leadership and Resilience) Training. A bespoke model is required, the policy for which will be owned by ATG(A).
7. **Sport.** Whilst DH will not apply to sport as National Governing Bodies (NGBs) set the safety standards required for their sport, it remains a chain of command responsibility to adhere to their legal DoC obligations when their soldiers participate in sport. In certain circumstances, the Army may wish to impose stricter standards in some areas, such as mandating the ability to swim prior to conducting sailing.
8. For those activities that are not categorised as Arduous Army Training, Adventurous Training or Sport reference should be made to [ACSO 3235 – Authorisation of Comparable Activities which are not categorised as Adventurous Training or Sport](#), which outlines the procedures for the authorisation and conduct of activities which, by their very nature, are comparable to AT and/or Sport, but are not categorised as such within Joint Service policy.

## Governance

9. **Senior Duty Holder**<sup>92</sup>.
  - a. Directs the Army to have an effective process for managing RtL and that the activities to which DH is to be applied are duly endorsed and assured.
  - b. Elevate any safety related risk to Secretary of State that cannot be made ALARP and tolerable within Army TLB means.
  - c. Direct that all subordinate Duty Holders receive appropriate training<sup>93</sup> and have sufficient resources to deliver their role and responsibilities.
  - d. Formally appoints ODH through a letter of delegation.
10. **3\* Level**<sup>94</sup>.
  - a. Understand RtL activities across their High Level Budgets areas.
  - b. Ensure adequate resources to facilitate risk management at ODH level.
  - c. Sponsor intractable risks elevated by ODH to the SDH.

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<sup>91</sup> AGAI Vol 1 Ch 7.

<sup>92</sup> CGS is the Army's SDH.

<sup>93</sup> ODHs are to attend the 1-day DSA Generic DH Course. The course remains valid for 3 years.

<sup>94</sup> DCGS, CFA and CHC.

- d. **HC** – for firm base activities only.
  - e. **CFA** - hold Pan-Army (Command) risks and dispensations where appropriate. The risk referral and dispensation process are detailed at Chapter 4.
11. **2\* Level<sup>95</sup> - Operating Duty Holder (as ODH).**
- a. Understand RtL activities within their Area of Responsibility (AoR)<sup>96</sup>.
  - b. Within each RtL activity, balance risk with resource over time.
  - c. Agree and own dispensations (where no pan-Army dispensation has been issued).
  - d. Ensure that safety related risk is managed to at least ALARP and tolerable and, where this is unachievable, escalated for resolution by the chain of command or SDH.
  - e. Supported by appropriate Heads of Capability (HoC), ensure activity and equipment are not operated outside of the safety case without suitable and sufficient risk assessment, controls and mitigation, subject to operational circumstances.
  - f. Meet DH obligations for FE for UK and overseas operations.
  - g. Ensure compliance with specific direction on DH for the endorsed RtL activities set out by the Army Safety Sub-Committee.
  - h. Sponsor the case for additional resource to mitigate risk to appropriate command groups.
  - i. Where directing RtL activities which involve personnel from other TLBs, be prepared to assure to those TLBs that risk is managed to ALARP and tolerable.
  - j. Formally appoint DDHs in their AoR through a letter of delegation (LoD); an example is at Annex A to this Chapter.
  - k. Ensure DDHs have completed the ASCen DDH on-line training course and have at their disposal sufficient resources to deliver their role and responsibilities.
  - l. Chair an annual Safety Board that either collectively, or individually, reviews all RtL activity in their AoR. Safety Boards must be attended by all DDHs and should include any relevant updates from DH-facing SMEs (including DE&S PT) that pertain to risks in the AoR. The agenda is at the discretion of the ODH but should include a summary of reported incidents/accidents across the AoR (including recommendations/lessons from investigations), a review of the DDH's key risks (including control measures) and a summary of output from assurance of activity.
12. **1\* Level<sup>97</sup>.**
- a. Understand RtL activities within the brigade/command.
  - b. Mentor all DDHs' approaches to managing RtL.
  - c. Oversee the assurance process by DDHs.

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<sup>95</sup> GOC 1 (UK) Div, GOC 3 (UK) Div, Comd JHC, GOC FTC, GOC LONDIST, GOC RC, DLW, COS FA (for 16X), D Cap (as 2\* commander of the TDUs), GOC ARITC.

<sup>96</sup> AoR refers to the personnel OPCOM of the ODH.

<sup>97</sup> Including OF 5 Commanders

- d. Elevate and help prioritise DDHs' safety risks to the ODH level.
- e. Develop a culture for safety and conscience at the 1\*/OF 5 command level – see the [Army Safety and Environmental Protection Sub Strategy \(ASEPS\)](#) for safety culture details.

13. **Delivery Duty Holders (DDH)<sup>98</sup>**

- a. Identify what RtL activities occur within the unit, assessing the risk to ensure it is appropriately managed.
- b. Ensure activity and equipment are operated within the Safe System of Work/Training (SSOW/T) as articulated in the safety case or relevant policy document. Where not within a recognised SSOW/T, the activity must be risk assessed and the residual risk(s) tolerated or transferred.
- c. Stop or adjust activity where risk is not ALARP and tolerable. Then conduct action to restore ALARP and then maintain tolerability.
- d. Where dispensations have been authorised by the 3\* Comd or ODH, ensure all controls and mitigations are understood, applied and that regular reviews are carried out frequently and, as a minimum, every 6 months.
- e. Ensure compliance with specific direction on Duty Holding.
- f. Having engaged with the chain of command for resolution and, in extremis, elevate any safety related risk to the appointed ODH that cannot be made ALARP and tolerable within allocated resources.
- g. Where directing RtL activities which involve personnel from other TLBs/units, be prepared to assure to those TLBs/units that risk is to be managed to ALARP and tolerability.
- h. Report to ODH annually on RtL activity, risk management and incidents/accidents via the ODH Safety Board.

14. **Chief Safety (Army).** In addition to their safety policy role, is responsible for the management and oversight of the Army's DH policy. In doing so they will:

- a. Maintain records of the endorsed RtL activities to which DH is to be applied within the Army.
- b. Develop and deliver appropriate training to Duty Holders<sup>99</sup>.
- c. Inform the Chain of Command (through Command Groups) of emerging DH issues.
- d. Advise and create bespoke DH arrangements with the chain of command when the situation demands.
- e. Liaise with Defence Safety Authority (DSA) over Army DH issues.

### **Duty Holding in UK Operations**

15. Whilst for UK resilience operations, the Standing Joint Commander UK (SJC(UK)) operates direct to Government, as far as is practicable, normal DH principles will apply on such operations; it must be recognised that complex force packages involving all 3 Services and other Defence and

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<sup>98</sup> Commanding Officers/OCs of Independent Squadrons.

<sup>99</sup> ODHs will either attend the DSA-run training package or be briefed by Chief Safety (Army) in person; DDHs will be briefed by Chief Safety (Army) on the CODC and undertake the ASCen DLE- hosted online DH training (Code 101).



external agencies are task organised to meet the requirements of these operations. SJC(UK) will consult with ASCen on bespoke DH arrangements for inclusion in any Operation Order.

## Duty Holding on Overseas Operations

16. When activities identified by the SDH for Duty Holding are conducted by Army TLB personnel on operations, and/or under a Joint Operational construct, the Army's force generating DH chain is responsible for preparing the deployed troops to the required standard and defining the safe operating envelope for the conduct of the activity when deployed on operations (eg compliance with Pamphlet 21). Duty Holders retain their responsibilities for deployed Force Elements who are owed a Duty of Care by the chain of command under the Joint Operational Commander.

17. If the Joint Operational Commander wishes to exceed the agreed operating envelope, a discussion is required with the appropriate ODH. If the ODH is not prepared to extend the operating envelope to allow the activity, but the Joint Operational Commander wishes to continue, then the matter should be referred to the SDH. If circumstances do not permit this referral, the Joint Operational Commander must accept ownership of the risk. This should be completed iaw with [DSA03.DLSR.LSSR](#).

18. The same principle applies to operating equipment outside of its endorsed Safety Case. PJHQ must engage with the Army ODH who will engage with D Cap as capability sponsor (and where applicable D Sp as the conduit into DE&S); D Cap is best placed to understand and articulate the true nature of the risk, but the ODH will be clearly known to PJHQ. The discussions must identify what additional mitigations can be applied to reduce safety risk if there is a routine requirement to exceed the defined safe operating envelope. If D Cap (informed by D Sp and DE&S) does not agree to extend the operating envelope, PJHQ must accept ownership of the risk, with the ODH fully engaged in the process. The DH process for overseas operations is shown at Annex B.

## Duty Holding for units employed outside the Army TLB

19. Where an Army unit is employed for organisational necessity away from the Army CoC, DH responsibilities remain in line with ACSO 3216; although the ODH may be identified as the respective 2\* Commander such as 3 Cdo Bde RM, where the ODH for all Army Cdo units is Commandant General Royal Marines (CGRM).

## Duty Holding in Training<sup>100</sup>

20. Friction can occur in the Collective Training space between 2\* formations<sup>101</sup> who perceive parent Commanding Officers as being DDH for their personnel at all times. To address this CTG advocate that DH status is to be held within the Collective Training Establishment's (CTE) chain of command when it is the CTE who have **designed, are directing and delivering** combined arms training activity.

21. This policy allows for the transfer of DDH status for specified periods of collective training. Commanding Officers will remain DDH for their personnel with responsibility to safely generate force elements prepared in all respects when conducting special to arm and combined arms training at CTEs. However, during the phase when the CTE has designed and is directing and delivering combined arms training (ie competency earning exercise), the CTE Commander assumes DDH status, which is to be included in the exercise coordinating instructions and has overall responsibility for the safe conduct of the training. The precise time will be recorded and logged by exercise control when DDH responsibility is transferred from exercising Commanding

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<sup>100</sup> All stakeholders must recognise and acknowledge that DoC is the primary legal and moral obligation, the responsibility and accountability for which always sits with commanders (from JNCO to General) overseeing activity, irrespective of any DH status.

<sup>101</sup> 1XX, 3XX and FTC.

Officer to CTE Comd and returned, noting that this will only apply when a RtL activity requiring a DH construct is conducted. To support this process, CTEs are to establish a process to ensure that DDH-held risks are transferred at the point of DDH transition.

## Duty Holding for Collective Training Establishments

22. Transfer of DDH to the CTE Comd should also be accompanied by a transfer of ODH to the DLW at the point when training that has been designed by and is being directed and delivered by the Comd CTE is undertaken. This must be included in the exercise instruction and the time and date of transfer recorded by exercise control.

## Part 2

### Background

23. The Defence Safety Review in 2012 made it clear that Duty Holding was a critical instrument for managing RtL and therefore it was decided that the concept should be implemented as appropriate across Defence. In 2013 the Army Command Group directed that the DH model be aligned to the Chain of command (CoC) with CGS as the SDH, 2\* Commanders as the ODH and Commanding Officers as the DDH<sup>102</sup>.

### Duty Holding in the Defence Context

24. The Defence Duty Holding Principles<sup>103</sup> are:

- a. Duty Holding relates to the military **activities** which present a justified, credible and reasonably foreseeable RtL and where DoC is inadequate for owning, assuring or escalating the risk.
- b. Duty Holders should be appointed at 3 levels: SDH, ODH and DDH.
- c. Duty Holders should be competent and adequately prepared for DH, by means of formal training.
- d. Duty Holding is not rank-related, and a Duty Holder should have direct access to a superior Duty Holder.
- e. Duty Holders should be empowered through letters of appointment.
- f. Duty Holder Responsibility, Authority and Accountability (RA2) are to be aligned, to ensure RtL is mitigated to As Low As Reasonably Practicable (ALARP). Where this is not possible for Organisational reasons, the SDH must ensure that Duty Holders have the necessary influence to allow the mitigation of the RtL.
- g. Duty Holders must have the authority to pause or cease activities within an operating envelope where an operating risk is no longer ALARP and tolerable.
- h. Where a Duty Holder is unable to mitigate a RtL to both ALARP and tolerable, a mechanism should exist for the risk to be escalated up the Duty Holder chain.
- i. Duty Holders always retain their responsibilities for deployed Force Elements (FEs). These FEs are owed a DoC by the Operational Commander.

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<sup>102</sup> DSA0.1.2: Implementation of Defence Health, Safety and Environmental Protection, Chapter 3: Duty Holding.

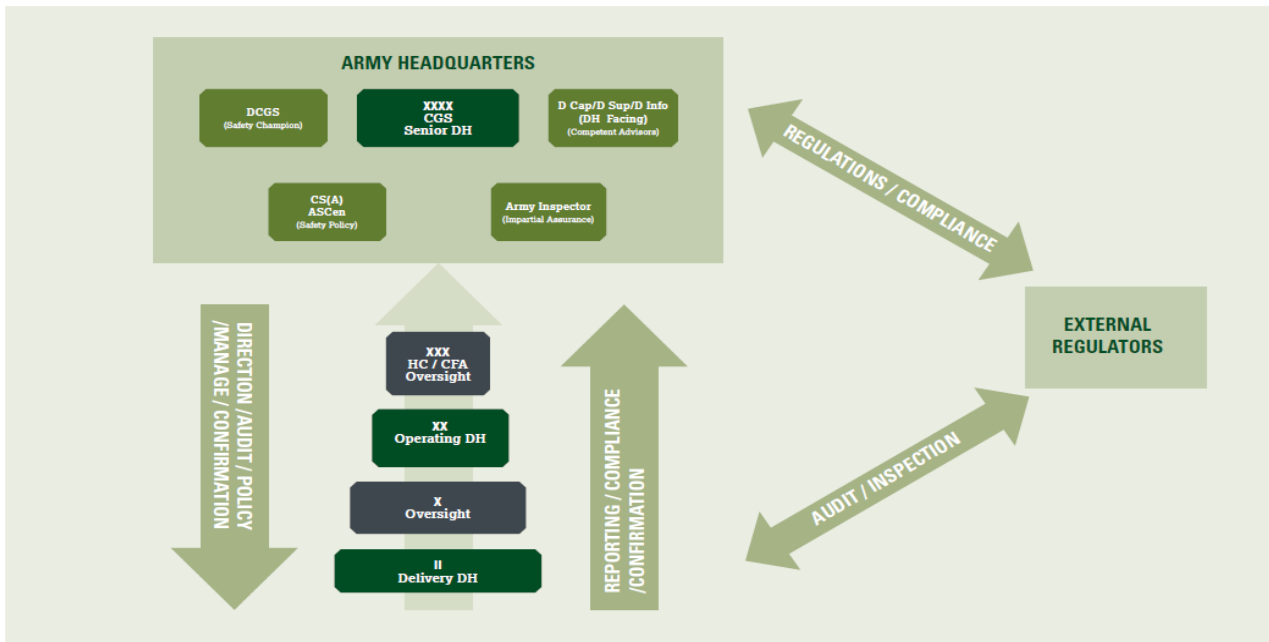
<sup>103</sup> The Defence Safety Committee endorsed DG DSA's Duty Holding Policy Paper in Jun 17.

- j. Organizations that support Duty Holders by providing platforms, equipment (DE&S) and infrastructure (DIO) that are designed, manufactured and maintained to be safe to operate are recognised as Duty Holder-facing.

## The Army Duty Holding Model

25. A pictorial representation of the Army DH model is shown below:

ARMY DUTY HOLDING FRAMEWORK



## Multiple DHs

26. Where soldiers are deployed on activities that involve multiple providing DDHs, the roles and responsibilities of the DDHs (and by default their respective ODHs where activity requires an ODH dispensation) are as follows:

- a. Providing DDH. The providing DDH has a DoC to ensure that the soldier:
  - (1) Meets joining criteria (as per any admin instruction or FGenO).
  - (2) Is fit and is temperamentally suited to undertake the planned activity.
- b. Receiving DDH. The receiving DDH, as the director of the activity, is the risk owner and hence is considered to be the “lead DDH”. They are to ensure that the activity remains within the safe operating envelope. They are to articulate the joining criteria and ensure that:
  - (1) Supporting documentation demonstrates the SSoT.
  - (2) The correct dispensations in place (where required).
  - (3) Safe execution of the activity will be adequately assured.

27. Examples of this system in practice are:

- a. An overseas exercise or operation with multiple providing units. The DDH for the activity will be the CO of the lead unit responsible for planning, training and deploying

on the exercise/operation. The Exercise Instruction or FGenO must detail who the DDH is for the activity. The providing COs should utilise supporting documentation, judgement and their personal knowledge of the people involved to decide on the level of assurance required to satisfy them that the activity is planned and executed safely.

- b. An organised course such as CLM, AT or range management. An example might be a soldier attending an AT course at the Joint Adventurous Training Centre Indefatigable. ATG(A) provides the SSoT for the course and hence is the Duty Holder for the activity. The providing CO does not need to seek additional assurance regarding the safe delivery of the course because ATG(A) is regulated and assured and as such, can be considered to be a competent delivery organisation.
- c. **Short Term Training Teams (STTT) and Defence Engagement (DE) Activities.** The lead DDH for STTT/DE activities must be included in the operation's FGEN coordinating instructions and has overall responsibility for the safe conduct of the STTT/DE activity (noting that this will only apply when a RtL activity subject to DH is being conducted). The lead DDH should be in a position to effectively manage the safety risks associated with the activity – for example the CO of the STTT lead unit, the local Defence Attaché, or can be raised to 1\* level if that better suits the force structure and risk management profile<sup>104</sup>. When conducting STTT and DE activities, providing DDHs will retain responsibility to safely generate force elements prepared in all respects to conduct the planned STTT/DE activities.
- d. **Trials and Experimentation.** The Army DDH policy for trials and experimentation is similar to that outlined above. For activity that has been designed by and/or directed and delivered by a Trials and Development Unit (TDU), the ODH is D Cap and the lead DDH is the CO of the TDU. The DH construct is to be articulated in the Trials and/or Experimentation Directive. When conducting trials and experimentation activities, providing DDHs will retain responsibility to safely generate force elements prepared in all respects to conduct the planned trials and experimentation activities. The force preparation requirements must be clearly articulated in the Trials and/or Experimentation Directive to inform the force generation activity.

## Arduous Army Training (AAT)

28. Land environment training which, by the nature of the activity, the environment or other factors, is more demanding than MATT 2<sup>105</sup> may be classed as ATT. An illustrative (not exhaustive) list of known AAT activities is at Annex E. These have been categorised against the scientific research by the Institute of Naval Medicine (INM) using Physical Activity Level (PAL)<sup>106</sup> where AAT is defined as an activity with an energy requirement (relative to the combination of intensity, duration and repetition) of  $\geq$  PAL 2.5. If in doubt, apply the risk management process contained within this document.

29. **Pre-Training.** AAT activities may require pre-training to bring personnel up to the standard required to meet the SSOT. If the pre-training also meets the definition of AAT, it must be conducted in accordance with this ACSO. It is recognised that the individuals may wish to conduct their own pre-training outside of formal organised activities; in this case individuals should be advised by the CoC on the mitigation of the inherent risks.

<sup>104</sup> Where the DDH being nominated is not already appointed as a DDH, the ODH must formally appoint the DDH in accordance with this Chapter.

<sup>105</sup> MATT 2 incl RFT(S) and AFT) is the minimum requirement for physical ability in the Army and (whilst demanding) is not deemed as arduous when conducted as part of routine activities.

<sup>106</sup> Institute of Naval Medicine - Define Arduous Army Training dated 26 Nov 18.

Annexes to Chapter 6:

- A. Dispensation Process (Appendix 1 – Risk Dispensation template).
- B. Duty Holding on Overseas Operations – Process Flow.
- C. An Example Letter of Authority to an ODH.
- D. An Example Letter of Authority to the SDH (Reply).
- E. Illustrative list of AAT activities.

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## **DISPENSATION PROCESS**

1. There are a number of areas where risk has been identified and a dispensation is required to be put in place to allow continued training or use of equipment. This is likely to be as follows:

a. **Training Dispensation.** Where training exceeds the boundaries of the operating capability as defined by the SC or is outside of the Safe System of Training. Training dispensations remain within the direction and control of the relevant 2\* ODH. Such dispensations should only be issued where the training activity to be conducted is beneficial in meeting the requirement to train to meet a specific operational task. For recurring tasks, carried out by multiple units, on multiple occasions, and where control measures remain the same, a fixed time period may be applied. Control measures should be regularly reviewed.

b. **Operation outside of Policy.** There will be occasions where risk is assessed as low, hence owned by the DDH, but policy requires higher authority/ ODH to deviate. In these instances, the DDH can deviate, subject to completion of a suitable and sufficient risk assessment, the residual risk remaining LOW in accordance with Chapter 4 Annex A, the required controls are in place, and the decision recorded (having consulted with 1\* if required). The policy should then be highlighted to the Formation SO1 FP to enable it to be challenged and the ODH requirement removed and, if the requirement to deviate is an enduring one, for the SSoT defined in the policy to be revised.

b. **Equipment Capability Shortfall.** The majority of risk referrals are likely to be in relation to equipment and will result in referral by the DE&S. If DE&S cannot provide sufficient risk reduction through technical means, the Operating Centre Director will refer the risk to the Capability owner, who in the Army's case is D Cap. A Risk Referral Working group (RRWG) will then provide advice or measures to the Fd Army HQ for them to mitigate the risk. These are likely to include:

(1) Technical solution. These may be time bounded. (eg Re-Engineered Warrior Final Drive and GPMG Barrel replacement).

(2) Changes to the operating envelope. (eg PCLV 3rd seat, carriage of personnel in the rear of Pinzgauer).

(3) Improved training, supervision and information.

2. Where the referred risk is pan-Army but emanating from Field Army directed/planned/organised activity, and is deemed tolerable by the DH facing SME, agreement will need to be sought from HQ Fd Army. HQ Fd Army will then discuss the risk with the 2\* ODH and potentially agree to retain the risk. In this instance, HQ Fd Army will issue a Dispensation, via a safety notice via email (SNvE), to 2\* Fmns which will detail the mitigations and control measures for them to exercise.

3. A record of dispensations must be retained on the Fmn risk register and subjected to audit. Where the Army is the designated Lead User, a copy of the dispensation must be agreed with other TLBs who use the equipment.

4. A Risk Dispensation template is attached at Appendix 1.

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**DISPENSATION TEMPLATE EXAMPLE<sup>107</sup>**

XXXX 19

**GOC**

**REQUEST FOR GOC (UK) DIV – ACCEPTANCE OF RISK (AOR) – UNIT - ACTIVITY**

**Background**

1. Brief statement on what activity the unit is undertaking, why and when? (2 lines max)

**Issue**

2. What is the issue (FonF<sup>108</sup> trg, working outside of policy, Safety Cases etc).

**Why a 2\* AOR is required**

3. The planned trg will not meet UK's Safe System of Training (SSOT) or policy, rules and guidance direct that GOC should hold the risk.

**What will be the impact if a 2\* AOR is refused?**

4. Risk to reputation, unable to achieve mission etc.

**Risk Analysis**

6. Confirm risk analysis methodology (Ch.4).
7. Without control measures - how is the risk assessed?
8. With control measures – how is the risk assessed?

**CM to bring the activity to ALARP AND TOLERABLE**

9. The following CM will be required to ensure that any residual risk is ALARP and tolerable (List CMs here):

**1\* Comment**

- 10.

**GOC's Decision**

11. The GOC has agreed/not agreed to hold the risk for XXXX to conduct FonF trg with the XXXX during the period XXXX subject to the CM in para 8 above which are to be acknowledged and accepted by DDH XXXX.

12. Date of decision:

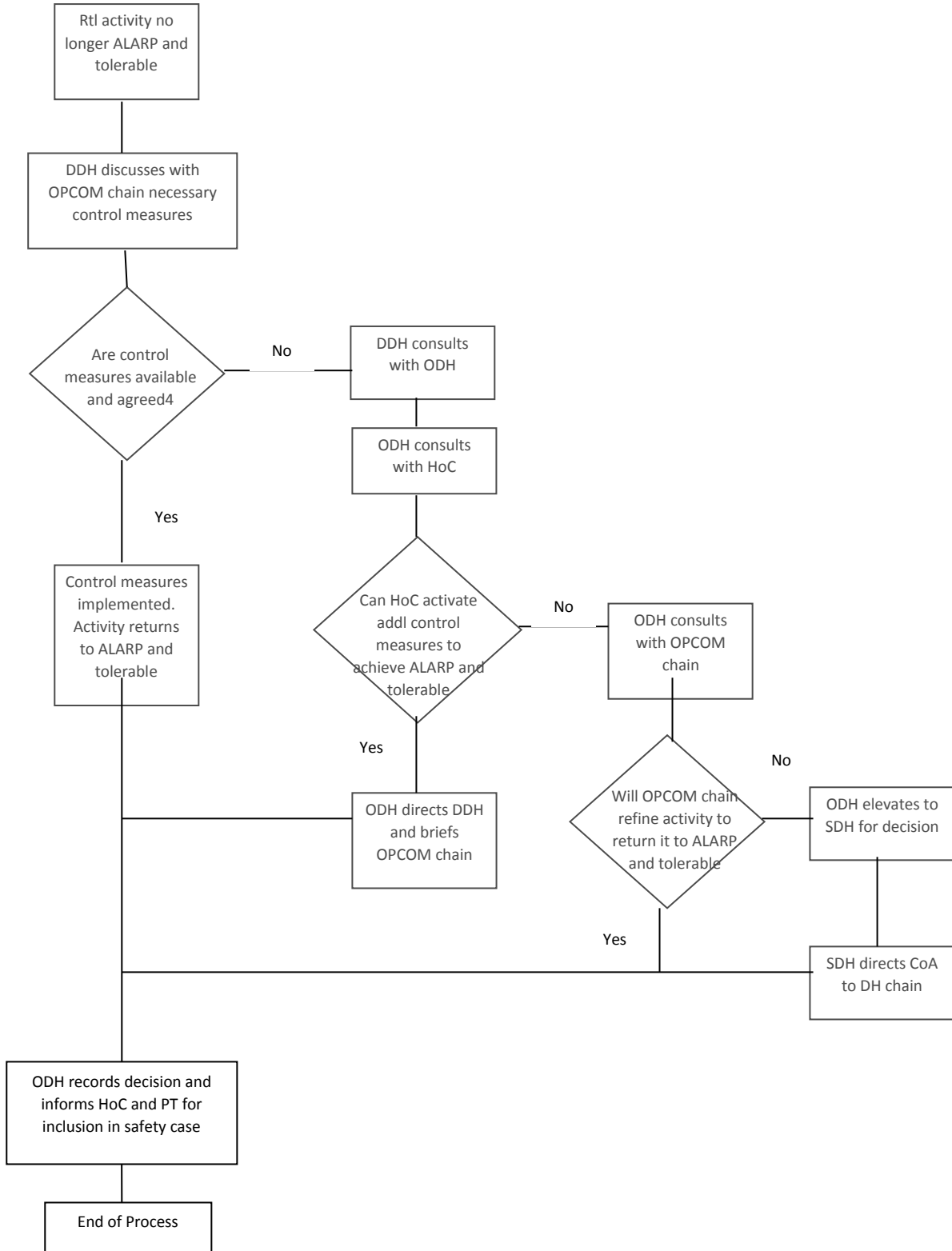
**GOC Signature**

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<sup>107</sup> Note the Official classification, which maybe up to OFFICIAL-SENSITIVE.

<sup>108</sup> Force on Force.

**DH ON OVERSEAS OPERATIONS - PROCESS FLOW**



## **AN EXAMPLE LETTER OF AUTHORITY TO AN ODH**

DO/ CGS

Major General  
General Officer Commanding 1<sup>st</sup> (United Kingdom) Division  
Headquarters 1<sup>st</sup> (United Kingdom) Division  
Picton Barracks  
Fulford Road  
York  
YO10 4HD

November 2018

### **APPOINTMENT AS OPERATING DUTY HOLDER FOR 1<sup>st</sup> (UNITED KINGDOM) DIVISION**

References:

- A. [DSA 01.2 Chapter 3 – Duty Holding](#).
- B. ACSO 3216 – Organisation and Arrangements for Safety and Environmental Protection Management in the Army.

1. In accordance with Reference A, as the Army's Senior Duty Holder, I hereby appoint you as the Operating Duty Holder (ODH) for the following Risk to Life (RtL) activities, as defined in Reference B, undertaken by personnel under your command:

- All training involving all types of live firing.
- Arduous training.
- Adventurous Training.
- Military Diving.
- Operating / driving military bespoke vehicles.
- Military parachuting (less Display Teams<sup>109</sup>).
- EOD (and similar) activity, including Ammunition and Demolitions.

2. You are personally responsible and accountable for ensuring that RtL when undertaking such activities is mitigated to As Low as Reasonably Practicable (ALARP) and tolerable. Further guidance on your roles and responsibilities as ODH are contained in Chapter 4 of Reference B. Where RtL cannot be maintained as ALARP and tolerable, you are to stop and adjust the activity to restore ALARP and then maintain tolerability. In circumstances where RtL cannot be restored to ALARP, but the activity must still be undertaken to maintain Defence outputs, you are to elevate the risk to me, informing the Chain of Command as necessary, in accordance with the process contained in Reference B.

3. You are to formally appoint Delivery Duty Holders (DDH) in your Area of Responsibility through a letter of authority and to ensure that DDHs are appropriately trained and competent to undertake their duties. You are to ensure that you understand the RtL activities within your command and to agree and own 2\* dispensations. In accordance with Reference A, you are to ensure that you attend the DSA Generic Duty Holder's course within 6 months of assuming your appointment<sup>110</sup>. I expect you to attend the Army Safety Committee where you will have the opportunity to raise issues identified during your own subordinate Safety Board.

4. I should be grateful if you could confirm in writing to me (copy to Chief Safety (Army)) that you are content to accept this appointment by 01 Jan 19.

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<sup>109</sup> ODH for Parachute Display Teams is Comd HC.

<sup>110</sup> Chief Safety (Army) (CS(A)) can advise.

## **AN EXAMPLE LETTER OF AUTHORITY TO THE SDH**

DO/DCGS

General M A P Carleton-Smith CBE ADC Gen  
Chief of the General Staff  
Army Headquarters  
Blenheim Building  
Marlborough Lines  
Andover  
Hants  
SP11 8HJ

August 2018

Sir,

### **APPOINTMENT AS OPERATING DUTY HOLDER FOR THE ROYAL MILITARY POLICE SPECIAL OPERATIONS REGIMENT, MILITARY CORRECTIVE TRAINING CENTRE AND MILITARY PROVOST GUARD SERVICE**

Reference:

A. CGS's Operating Duty Holder Delegation Letter dated 30 Jul 2018.

1. I am writing as directed in Reference A that I am content to accept the appointment as the Operating Duty Holder for the Royal Military Police Special Operations Regiment, Military Corrective Training Centre and Military Provost Guard Service.

2. I understand that I am personally responsible and accountable for ensuring that Risk to Life (RtL) activities are mitigated to As Low as Reasonably Practicable (ALARP) and tolerable for the following:

- All training involving all types of live firing.
- Arduous training.
- Adventurous Training.
- Operating/driving military bespoke vehicles.

And that, if this is not possible, I am to elevate the risk to you.

3. I can confirm that I have formally appointed the Delivery Duty Holders (DDH) in my Area of Responsibility through a letter of authority and agreed ownership of 2\* dispensations. I will attend the Army Safety Committee and use this opportunity to raise any issues from the Army Safety Sub Committee.

4. Finally, I can assure you that I have sufficient knowledge and understanding of Duty Holding to undertake this role.

## ILLUSTRATIVE LIST OF ARDUOUS ARMY TRAINING ACTIVITIES

1. The following is an illustrative list of known Arduous Army Training (AAT) activities alongside Normal activities. It is not definitive, and Commanders **must** gauge their own activity against those examples and **ensure** they apply the appropriate risk management process.

Arduous Army Activity - PAL $\geq 2.5$		
Activity Type (a)	Activity Details/Parameters (b)	Examples (c)
Individual or Team endurance and navigation events covering various distances with a variety of loads.	<ul style="list-style-type: none"> <li>- Individual weighted load carry (<math>\geq 20</math>kgs) in all weather conditions.</li> <li>- Series of MATT 2 (+) events or physically demanding activities over a short period of time.</li> <li>- Physical and psychological fatigue due to course length and career implications.</li> </ul>	<ul style="list-style-type: none"> <li>- SF Selection and Briefing Course.</li> <li>- All Arms Pre-Parachute Selection (P Coy).</li> <li>- All Arms Cdo Cse.</li> <li>- RAPT Selection.</li> </ul>
Career Progression/ Selection events with physical and psychological components over sustained periods of time.	<ul style="list-style-type: none"> <li>- Series of physically demanding activities during fieldcraft (Adv to Contact followed by repetitive PI Attacks).</li> <li>- Individual physical and psychological fatigue due to course length and career implications.</li> <li>- Individuals carrying loads <math>\geq 20</math>kgs (in CEMO/CEFO) in all weather conditions.</li> <li>- Reduced rest, nutrition and hydration.</li> </ul>	<ul style="list-style-type: none"> <li>- PSBC/PCBC/SCBC</li> </ul>
Multi-Activity Team Events Team events with series of loaded Marches, assault courses and other military tasks within a short period of time.	<ul style="list-style-type: none"> <li>- Individual loads <math>\geq 20</math>kgs.</li> <li>- Multi-terrain and may include adverse weather conditions.</li> <li>- Where the SSOT is owned by another nation.</li> <li>- Could include a number of activities; Swimming, Running, Cycling, Cross Country, Stretcher Race and Loaded March.</li> </ul>	<ul style="list-style-type: none"> <li>- Lanyard Trophy or similar.</li> <li>- Overseas Military Skills Competitions.</li> <li>- Race the Sun (also covered by ACSO 3235).</li> </ul>
Cumulative effect of other factors on normal activities ( $\leq$ MATT 2).	<ul style="list-style-type: none"> <li>- Individuals have had limited sleep and/or nutrition/hydration prior to the event.</li> <li>- Involve several dismounted activities (successive of rolling Sect/PI Attacks <b>or</b> NavEx) within a short period of time followed by an endurance activity (Advance to Contact or loaded March).</li> </ul>	<ul style="list-style-type: none"> <li>- MATT 2 level events (RFT(S)/AFT) during a field exercise.</li> <li>- DCC Field Training Exercise/Courses/ Selection Events.</li> </ul>
<div style="border: 2px solid black; background-color: yellow; padding: 5px; display: inline-block;"> <b>APPLICATION OF ARDUOUS ARMY TRAINING POLICY - ACSO 3216</b> </div>		
Normal Activity (routine in barracks and incl MATT 2) $< 2.5$ PAL		
Training Type (a)	Activity Details/Parameters (b)	Examples (c)
Role specific physical training and MATT 2 testing.	<ul style="list-style-type: none"> <li>- Moderate exertion or higher over a short period.</li> <li>- Comparable with routine daily activity (including PT).</li> </ul>	<ul style="list-style-type: none"> <li>- Level 1-3 Unit PT</li> <li>- RFT(S)/AFT/PFA/ SCR</li> </ul>
Role specific fieldcraft or specialist training.	<ul style="list-style-type: none"> <li>- Moderate exertion or higher over a short period.</li> <li>- Carrying <math>\leq</math>CEFO over short distances.</li> <li>- Adequate rest, nutrition and hydration.</li> </ul>	<ul style="list-style-type: none"> <li>- Fieldcraft and patrolling skills.</li> <li>- RE Bridging tasks.</li> <li>- RA Fd Gun Trg.</li> </ul>

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## CHAPTER 7

### FIRE

#### Introduction

1. The Defence Fire and Rescue (DFR) are responsible for managing Defence's exposure to fire risk at the corporate level, ensuring that consistent and coherent advice on mitigating the business and capability risks posed by fire is available to all SDH/HOE across the Department. DFR will be the focal point for all matters relating to Fire Risk Management (FRM) across the Department including on deployed Operations, and other synergistic activities which improve safety across Defence.
2. This role does not include daily and routine fire management activities which are the Army's own responsibility utilising the Defence management structure of the Defence Fire and Rescue Management Board (DFRMB) and supporting boards and forums.
3. The Head of Establishment (HoE). Whilst it is the HoE's responsibility to 'operate safely', within the Army, HoE will not have any Duty Holding responsibilities less for those individuals that fulfil the criteria within Chapter 6 – Army Duty Holding. All HoE responsibilities are contained within [ACSO 1105](#).

#### Part 1

4. To ensure that the Army maintains statutory compliance the roles and responsibilities are:
  - a. **ASCen.** Chief Safety (Army) is to ensure that a Memorandum of Understanding (MoU) is agreed and maintained between Army HQ and DFR. This is to be reviewed annually and agreed at the Army Safety Committee (ASC).
  - b. **Commander Home Command (Comd HC).** *Comd HC is to chair the Defence Fire and Rescue Management Board (DFRMB) in accordance with the Terms of Reference (ToRs)<sup>111</sup>, which is to be held bi-annually, or as required as business dictates. Note: TBC dependant on the outcome of the DFR review (Dec 19)*
  - c. **General Officer Commanding Regional Command (GOC RC).** *GOC RC is appointed as the Army's representative on the DFRMB. Prior to the meeting Army members of the DFRMB are to receive direction from DCGS<sup>112</sup> and report to the Army Safety Sub Committee (ASSC). Note: TBC dependant on outcome of the DFR review (Dec 19).*
  - d. **Headquarters Field Army (HQ Fd Army).** HQ Fd Army is the Training Requirements Authority (TRA) for all Army TLB fire safety training<sup>113</sup>.
  - e. **SO1 Fire and Environmental Protection (SO1 F&EP), ASCen.** SO1 F&EP is the Army's fire safety focal point and:
    - (1) is the fire safety assurance including liaison with the Defence Fire and Rescue (DFR).
    - (2) is to support CESO(A), ASCen, with the Army's fire assurance.
    - (3) is to ensure that the ASEWG, ASSC and ASC is briefed on all the Army's fire safety matters.

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<sup>111</sup> DFRMB ToRs are controlled by the Chief Fire Officer (CFO).

<sup>112</sup> Staffed by the ASCen SO1 Fire and Environmental Protection (SO1 F&EP).

<sup>113</sup> SO1 CSS, HQ Fd Army.

(4) is to ensure that the Army's representative is supported at the DFRMB.

(5) focal point for Major Accident Control Regulations.

f. **Regional Points of Command (RPOCs).**

(1) Are to ensure that suitable fire safety management plans are prepared and enacted in conjunction with DFR.

(2) Are to oversee and monitor the Fire Safety Management Plans produced by DFR (iaw JSP 426 Part 2 Chapter 4).

(3) Are to elevate any fire management risks that they are unable to deal with to HQ RC.

(4) Are to ensure that sufficient suitably qualified personnel are appointed to fulfil the Army's statutory obligations for fire safety iaw Compendium of Mandated Course Trained Personnel and [ACSO 1105 - Head of Establishment Responsibilities](#).

(5) Are responsible for Fire Safety Assurance in line with the Army HQ Question Set.

g. **HoEs.**

(1) Are to ensure that suitable fire safety management plans, including organisation and arrangements, are prepared and enacted.

(2) Are to elevate any fire management risks that they are unable to deal with to their RPOC.

(3) Are to ensure that the roles and responsibilities pertaining to fire safety, inspection and assurance iaw [ACSO 1105 - Head of Establishment Responsibilities](#) are completed.

h. **Units.** Are to ensure compliance with Fire Safety Regulations and that they have appointed appropriate fire safety personnel who are suitable trained and qualified in accordance with [Compendium of Mandated Course Trained Personnel](#).

5. Personnel appointed to any role that has fire safety responsibilities should be suitably trained and qualified within 3 months.



## Part 2

### Fire Safety in the Workplace<sup>114</sup>

6. Good housekeeping and the presence of appropriate fire safety policy for all workplaces reduces the possibility of a fire occurring. Carelessness and neglect not only make an outbreak of fire more likely but can also create conditions which may allow a fire to spread more rapidly.
7. **Responsibility.** On the MOD Estate, the HoE is deemed to be the Responsible Person (RP) for the management of fire safety on their establishment. The HoE delegates responsibility for the fire safety, through unit / local commanders for each building to the nominated Building Fire Focal Point (BFFP). This is often the building custodian or manager.
8. **Fire Training.** The Basic Fire Awareness course is hosted on DLE (course code BSFM01), which is mandated as part of a local induction and to all staff annually. It does not replace any local fire awareness training which has been mandated by the unit. However, it is a legislative requirement that employees are appropriately protected from fire. A vital component in achieving this goal is that employees should be trained in fire safety measures related to their establishment or location. Service, Civilian and Contracted persons employed to work on the MOD estate are to be given fire safety training on the following occasions:
- When joining an establishment (including training establishments) as part of formal arrival procedures.
  - Whenever the fire safety risk in a workplace (including deployment locations and accommodation facilities) change in such a way that retraining of personnel is required.
  - Annually.** However, more frequent training may be required in high/special risk areas, where special equipment is provided or where deemed necessary by Legislation /Regulation, local circumstances or a Fire Risk Assessment (FRA).
9. In addition to the general requirement for training detailed above, it is necessary to train personnel in the practical use of firefighting equipment. Such training should be appropriate to the firefighting equipment provided, the premises and any specific hazards or risks relating to the premises or equipment. Training advice can be obtained from the SO1 Safety and Environmental Protection Training, Education and Learning (SO1 S&EP TEaL), Army Safety Centre.
10. Fire evacuation drills are to be conducted at least at annual intervals and more frequently where warranted by the local risks.
11. **Workplace Housekeeping.** Unit Fire Safety Managers are responsible for training their BFFPs. This should include suitable measures to reduce the risk of fire on the premises contained within [JSP 426 Defence Fire Safety and Fire Risk Management Part 2: Guidance](#).
12. **Fire Risk Assessment (FRA).** An FRA should be conducted by the Competent Defence Fire Advisor (CDFA), by virtue of delegations and agreements, provides fire and rescue services that include the provision of appointed persons to undertake FRA(s) on behalf of HoE to assist them in discharging their legal obligations as relevant RP. The FRA must be reviewed by a Fire Safety Advisor depending on risk or if the situation changes ie a new appointee. Reviews of the FRA are dependent on the risk grading given by the Fire Safety Advisor (FSA). A FRA check should be conducted at intervals no longer than:
- Substantial risk – premises that fall into this grading may be subject to enforcement action and/or regular monitoring.

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<sup>114</sup> [JSP 426 Defence Fire Safety and Fire Risk Management Part 2: Guidance](#).

- b. Moderate risk – 3 yearly.
- c. Tolerable/Trivial risk – 5 yearly.

13. Periodicity for reviews and validations may be changed if, in the opinion of the FSA, the risk, management of the risk or other risk related factors warrant or require a more or less frequent review or whether there has been a significant change or if a fire has occurred.

14. The BFFP must ensure that they are aware of deficiencies identified within the fire risk assessment and the action plan implemented accordingly. They must also inform the FSA prior to any alterations involving the means of escape, fire warning systems, structural fire precautions or any change of use of the premises. The BFFP must make sure that everyone in their building is safe from fire. They must ensure that a fire risk assessment is completed by a qualified FSA, which will determine what the risks in the BFFP building are and to identify those measures necessary to minimise the risk to an acceptable level.

15. **Disabled Persons.** The Regulatory Reform (Fire Safety) Order 2005 covers the need to get all people out of buildings safely in the event of fire. It is the responsibility of the Line Manager or BFFP to talk to disabled staff or visitors and identify whether they will require any assistance in the event of an emergency. If any member of staff or visitor requires assistance, then a Personal Emergency Evacuation Plan (PEEP) should be put in place by the manager or building custodian.

16. **Testing/ Maintenance of Fire Safety Systems.** Every establishment will have a different arrangement for testing and maintenance and the BFFP will need to liaise with the establishment prime contractor and/or the Fire Safety Advisor for clarification. It is the responsibility of the BFFP to ensure the following fire safety systems are tested and recorded:

- a. Fire Alarms.
- b. Emergency Lighting.
- c. Fire Extinguishers.
- d. Suppression Systems.
- e. Means of escape.

17. **Key Points.** The following simple reminders should be shared with employees:

- a. Store stock safely; keep corridors, stairs and exits clear.
- b. Identify alarm points so that employees can warn others.
- c. Make sure doors are closed to stop fires from spreading.
- d. Place things that catch fire away from things that cause fire.
- e. Let someone know if you spot fire safety problems.
- f. Ensure everyone knows what to do if a fire alarm sounds.

## Single Living Accommodation (SLA)

18. **Smoking**<sup>115</sup>. Smoking is not permitted in a location that is near to entrances, or adjacent to entrances, to occupied premises or thoroughfares where non-smokers could be exposed to second-hand smoke. Where smoking is allowed in designated areas, these areas should be clearly signed. Attention should be paid to the discarding of cigarette ends/smoking materials to

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<sup>115</sup> JSP 375, Pt 2, Vol. 1, Ch. 13 and JSP 464, Vol. 2, Pt. 1, Ch. 5, Annex B.

ensure that they are extinguished and that none have been discarded where they may pose a risk of causing a fire (or littering).

19. **E-cigarettes.** Electronic cigarettes or 'e-cig' are classed as 'smoking materials' under MOD policy and can only be used in designated smoking area.

20. **Cooking**<sup>116</sup>. To maintain fire safety and minimise deterioration to the fabric of buildings. Cooking/snack preparation is only to be undertaken in spaces specifically provided for this purpose. Cooking in any form such open flame devices, microwave ovens, mini grills or toasters, is **not allowed** in bedrooms.

21. **Storerooms.** In the majority of SLA are rooms purposely designed for storing personal items that cannot be accommodated in the individual room, they are not for storing car batteries, petrol cans (full or empty) or car tyres. All packaging, boxes and stored items are to be kept a safe distance (minimum 1m) from any light fitting.

22. **Electricity.** Electrical appliances eg radios, hi-fi equipment, TVs, irons, kettles, etc. are only to be connected to authorised socket outlets. The use of multi-plug adaptors (that allow more than one electrical device to be run from one socket) dramatically increases the risk of overloading a socket ring main which can result in a fire going undetected and getting hold before it comes to light. Therefore, multi-plug adaptors are forbidden on MOD establishments. All electrical equipment should have a visual inspection to ensure it is in good condition for what is intended.

23. **Housekeeping.** Tidiness and cleanliness are essential fire prevention measures. The accumulation of rubbish and waste materials should be kept to a minimum, be cleared away each day and removed to a safe location outside and away from the building. Items should not be left to accumulate in corridors, stairways and across fire exits.

24. **Smoke Detectors.** These will be found in each bedroom and escape corridor. They are not to be tampered with or covered up. In the event of this happening; disciplinary action is to be taken against the perpetrator(s).

25. **Means of Escape.** Emergency escape routes are to be kept clear at all times. All fire doors (distinguishable by a blue circular sign with white lettering stating that it is a fire door) are kept either locked if they are in a storeroom or closed if they are to a habitable room or across a corridor.

26. **Key points.** SLA residents are to be informed to:

- a. Never:
  - (1) Overload socket outlets.
  - (2) Leave appliances plugged in and switched on when you leave a room for a considerable time.
  - (3) Run cables and flexes under floor coverings.
  - (4) Daisy chain extension leads.
  - (5) Never leave a cooking appliance unattended at any time.
  - (6) Use electrical appliances near to the sink or other water source.
  - (7) Use cooking appliances in your room.

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<sup>116</sup> JSP 464, Vol. 2, Pt. 1, Ch.5, Para 0509.

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(8) Leave pan handles hanging over the side of the cooker where clothing can catch them.

b. Always:

- (1) Report any defective appliances or equipment.
- (2) Ensure that any alterations are carried out by an authorised electrician.
- (3) All appliances are correctly fused.
- (4) Switch off all electrical appliances during a power failure.
- (5) Always use the facilities provided for cooking food.

27. **Enforcement.** The Defence Fire Safety Regulator (DFSR) is the main agency responsible for enforcing UK fire safety legislation on MOD establishments. They will consider complaints, carry out investigations after fires, and carry out risk-based audits. If there is a very serious risk to life, the DFSR can issue a notice preventing the premise being used for certain things, or preventing people from using all, or part, of the premises.

28. **Point of Contact.** Army HQ's point of contact with both DFR and DFSR is through the Army Safety Centre, SO1 Fire and Environmental Protection with fire safety delivery through HQ Regional Command and the Regional Points of Command (RPOCs).

## CHAPTER 8

### ELECTRICAL SAFETY AND PORTABLE APPLIANCE TESTING (PAT)

Reference.

A. JSP 375, Part 2, Vol 1, Chap 23 – Electrical Safety.

#### Introduction

1. Reference A lays down the MOD policy on electrical safety and Portable Appliance Testing (PAT). The need for PAT should be a result of conducting a Risk Assessment on the equipment by the owner or (HoE), to establish his/her safety requirements and necessary control measures this will include when they intend to conduct PAT. This chapter is designed to ensure Army TLB compliance.

#### Part 1

2. **Unit responsibilities.** All units are to:

a. Appoint a suitable qualified individual (JNCO) to undertake PAT across the unit.

b. Ensure PAT testing on the required frequency (para.4) with appropriate assurance checks and that this is recorded in a PAT Register.

c. Must conduct a risk assessment and have an electrical register that details the frequency of portable electrical testing.

d. Ensure that all personal equipment being used are declared and PAT prior to first use, especially within SLA, and then on the required frequency.

e. Assure themselves that the Maintenance Management Organisation (MMO) is conducting PAT at the agreed frequency (see para. 5).

3. **User responsibilities.** All electrical equipment must be inspected by the user before it is used. This consists of a visual check on the condition of the equipment looking for any signs of overheating or damage at:

a. The plug socket.

b. The plug.

c. The flex and lead.

e. **Damaged equipment must not be used.**

## Part 2

4. **PAT Programme.** All electrical items, particularly personal ones, are tested **prior to first use** and then:

<b>Equipment/environment</b>	<b>User checks</b>	<b>Formal Visual inspection</b>	<b>Combined inspection and testing</b>
Power leads, Extension leads, plugs and cables.	<b>Yes</b>	<b>Yes</b> As per category used with below or when issued	<b>Yes</b> As per category used with below or when issued
Heavy industrial use, high risk of equipment damage	<b>Yes</b>	<b>Yes</b> Weekly	<b>Yes</b> 6 - 12 months
Residual Current Devices (RCDs)	<b>Yes</b> Functional Test (socket outlet & portable RCDs)	<b>Yes</b> Weekly	<b>Yes</b> 6 – 12 months
(Class 1) Light industrial use handheld or bench mounted equipment	<b>Yes</b>	<b>Yes</b> 6 months	<b>Yes</b> 6 - 12 months
(Class 1) Earthed equipment handheld	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
(Class 1) Earthed equipment Hard wired (no plug) kitchen and workshop machines	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
(Class 1) Information technology	No	<b>Yes</b>	<b>Yes</b>
(Class 1) Earthed equipment Fixed systems and only moved occasionally, NOT hand-held	No	<b>Yes</b>	<b>Yes</b>
(Class II) Double insulated equipment frequently moved or hand-held	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
(Class II) Double insulated Moved occasionally, NOT hand-held	No	<b>Yes</b>	No
(Class 1) Earthed equipment Fixed systems and only moved occasionally, NOT hand-held	No	<b>Yes</b>	<b>Yes</b>
(Class II) Double insulated equipment frequently moved or hand-held	No	<b>Yes</b>	No

5. **PAT Register.** Whilst PAT of certain electrical devices may fall under the arrangements of respective MMO, it is imperative that the unit electrical register correctly identifies who has responsibility for the PAT of each type of electrical device – MMO or unit and when the PAT was conducted and by whom. The person who is conducting PAT must be competent to do so. They are to be added to the competent persons register. Should the competent person suffer from skill fade or have do not know how to conduct PAT they are to be removed from the register and not permitted to conduct Unit PAT until they have re-gained competency. There are 5 sections to a PAT Register which are:
- a. Electrical Register.
  - b. PAT Pass Register.
  - c. PAT Fail Register.
  - d. PAT machine calibration Register.
  - e. PAT Competent Person Register.
6. **PAT Testing Equipment.** A PAT device (for bench use) is available through the MOD supply system using:
- a. PAT device NSN – 6625 99 284 3037
  - b. Printer Scanner set NSN – 6625 99 724 3377.
  - c. Consumable labels NSN – 6625 99 380 6926
7. **Portable PAT Testing Equipment**<sup>117</sup>. Currently the MOD does not hold any portable (battery operated) PAT devices. Therefore, units may wish to purchase their own.
8. **Calibration**<sup>118</sup>. All PAT devices require calibration in accordance with the manufacturer's instructions. This is to be controlled and recorded via the unit's calibration procedures / register. AFPA can advise on this requirement. All Test Equipment (PAT machine) that require calibration should be entered onto the Unit Calibration Register.
9. **PAT Training.** All appointed personnel are to attend the Army's mandated PAT course. The minimum rank for attendance is JNCO. Courses can be booked through SO2 SHE&SD Trg RC. The successful candidate will then have the Specialist Qualification (Spec Qual) entered onto JPA or HRMS for Civil Servants.
10. **PAT Trainer.** Should an individual or unit want to qualify as a PAT instructor the Army Safety Centre<sup>119</sup> can advise on the skill set / competencies required.
11. **Extension Cables.** An often-overlooked hazard are military extension cables including any lead or multiway extension lead. These must be visually inspected before use, must not be overloaded (do not exceed their maximum current capacity) and should be used in conjunction with a Residual Current Device (RCD) if over 12m in length. Extension cables should only be used on a temporary basis. PAT inspection periods would be conducted as per the electrical device that they are providing power to. Or when issued out whichever is the shorter period.

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<sup>117</sup> Once current stocks of the PAT bench tester are exhausted the replacement will be a portable PAT equipment

<sup>118</sup> DECA SEALAND are the MOD nominated calibration contractor.

<sup>119</sup> SO1 Training, Education and Learning (SO1 TEaL).

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## CHAPTER 9

### RACKING AND SHELVING

#### References.

- A. Defence Logistics Framework (DLF) Supply.
- B. JSP 375, Pt. 2, Vol 1, Ch 4.

#### Introduction

1. Reference A lays down the MOD policy on racking and shelving, whilst Reference B is the MOD policy on workplace inspections. This chapter is designed to ensure ARMY TLB compliance with both in regard to racking and shelving.

#### Part 1

2. **Unit responsibilities.** All units are to:

- a. Ensure that their appointed Unit Safety Adviser is aware of the requirement to conduct inspections (dependant on the frequency of use) of racking and shelving.
- b. Ensure that all damage is reported as per unit Standing Operating instructions (SOPs).

#### Part 2

3. Inspections. Dependant on the level of risk ie the height and weight, the racking and shelving should be visually inspected for damage / deficiency by the store person / operator on a weekly basis. Where the risk is higher ie for racking and shelving above 2m, this inspection (visual from ground level) should be conducted by a 'supervisor'<sup>120</sup> and recorded as part of the Unit's weekly inspection regime.

4. More Complex Systems. Where more complex racking and shelving systems are in use there may be a requirement for an inspection to be conducted by the Maintenance Management organisation (MMO). This should be recorded by the unit.

5. Assurance. A unit's racking and shelving regime should be part of an annual audit either by the unit or Bde. This should include:

- a. Verification of the records that appropriate daily and weekly inspections are being conducted.
- b. Verification that in instances where an annual inspection by a 'technically competent person' is deemed as required, it has been conducted.
- c. Confirmation that damage / faults are being reported and repairs conducted.
- d. A review of damage history looking for repeated damage and propose solutions where necessary.
- e. Seek expert advice in areas of doubt (in the first instance this should be from the AFPA).
- f. Fully record findings and advice.
- g. Propose modifications to other training areas if appropriate (sharing Best Practice).

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<sup>120</sup> Minimum rank JNCO.

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6. Damage Categorisation. Any damage should be placed into one of the following categories:
  - a. GREEN. Superficial or cosmetic damage which will not affect the operation. Any interchangeable parts incorrectly located or incidents which can be solved immediately.
  - b. AMBER. Damage which renders the local area unfit for use and is in need of replacement or repair. If repairs are not affected within 4 weeks an AMBER risk becomes a RED risk.
  - c. RED. Damage which renders the greater area to be dangerous and in need of immediate attention to ensure safety.

If the damage falls within the AMBER or RED categories, the action should be directed to the MMO.

## CHAPTER 10

# ARMY ACCIDENT, INCIDENT, NEAR MISS AND DANGEROUS OCCURRENCE REPORTING

### Introduction

1. There are a number of actions that are required depending on the nature of the accident, incident, near miss, climatic injuries, occupational ill health, serious equipment failure, ammunition incident (including Free From Explosives (FFE) violations) and dangerous occurrence, including those involving fire and radiation hazard. An **incident** is defined as an unintended event not resulting in harm or damage - a near miss for example. An **accident** is an unintended event resulting in harm or damage. For clarity of language from this point on an incident refers to all activities listed above.

### Part 1

2. All accidents, incidents, near misses, dangerous occurrences and equipment failures<sup>121</sup> across the Army TLB must be reported to the Army Incident Notification Cell (AINC) using the [Army Form 510](#) (it can also be downloaded from the ASCen intranet page on MODnet). The form must contain as much detail as possible and include any equipment being used at the time with, where appropriate, exercise instructions and supporting documents attached. The form is not to be amended in any way. Once completed, forms are to be sent to the AINC group mailbox.

3. During non-office hours, incidents should be referred to the AINC on the next available working day.

4. All units are advised to retain a log of AF510s in accordance with JSP 375, Part 2, Volume 1, Chapter 39.

5. **Reporting Procedure.** The procedures to be followed for any accidents, near misses, climatic injuries, occupational ill health, serious equipment failures and dangerous occurrences including those involving fire, involving contractors whilst on Army administered MOD land or property must be reported to the AINC. Contractors may also report the occurrence under their own reporting procedures to their employer. This reporting requirement applies to all Army personnel, including those commanded or administered by other TLBs, including all Reservists and Cadets when on duty. It extends to RN/RM, RAF and civilian personnel working in the Army TLB or when operating Land Systems equipment, (eg weapons and vehicles), members of visiting Armed Forces and anyone affected by Army activity, its property or estate and contractors working on Army sites. This includes the reporting of environmental incidents.

6. The reporting requirements and method of notification are to be repeated on Unit Orders at least quarterly and must be included in Exercise, Range and Training instructions.

7. Where it is necessary to comply with the Joint Casualty and Compassionate Cell (JCCC) Policy and Procedures (JSP 751), there is no requirement to submit an additional notification<sup>122</sup>.

8. **Notifications.** However, **all** other accidents and incidents are to be reported to the Army Incident Notification Cell (AINC) using the AF510 (as shown at Annex A to this Chapter) to Army SafetyCentre-AINC-mailbox (MULTIUSER).

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<sup>121</sup> See also [DSA02.DLSR.LSSR](#): Land System Safety and Environmental Protection – Directive (Regulation 12) and [DSA03.DLSR/LSSR](#): Land System Safety and Environmental Protection – Defence Codes of Practice (DCoP) for Serious Equipment Failure reporting requirements.

<sup>122</sup> AINC is linked into the Joint Casualty and Compassionate Cell (JCCC).

9. **Promulgation.** Contact details for AINC and the DAIB POC must be included in all Exercise Instructions and Duty NCO, Officer, Staff Officer Folders etc.

10. **Near Miss reporting.** Units are to pay particular attention to Near Miss reporting (using the AF510), which is key to identifying future, more serious incidents.

## Part 2

11. All accidents and incidents (less for operational or JCCC), wherever they have occurred, are to be reported using the AF510 at Annex A to this Chapter. A unit involved in an incident whilst not in its own division or district, should report the matter to the division or district or garrison in which the incident occurred, as well as its parent division or district or formation. Units exercising overseas where the UK has a permanent military training facility<sup>123</sup> must ensure that the Comd of that location has also been informed. This can all be done using the same AF510 as submitted to the AINC.

13. **Adventurous Training (AT).** AT, including expeditions and overseas activity, instructions are to contain details of the accident reporting process. It is to be clearly stated that the AINC is to be notified in addition to any locally required arrangements.

14. **Advice.** The AINC can be contacted for advice or if there is any doubt as to whether an incident should be notified. Notifications can be made to AINC via:

- a. Military Email: [Army SafetyCentre-AINC-Mailbox \(Multiuser\)](mailto:Army SafetyCentre-AINC-Mailbox (Multiuser))
- b. Civilian e-mail. Via the internet to: [Army SafetyCentre-AINC-Mailbox@mod.gov.uk](mailto:Army SafetyCentre-AINC-Mailbox@mod.gov.uk)
- c. Telephone. Mil: 96770 3661 or Civil: 03067 703661 (Office Hours).
- d. Fax. Where an electronic submission is not possible, using an AF510 to Mil: 94393 6889 or Civil: 01264 886889.

15. Following initial notification to AINC, units will receive an acknowledgement email from AINC containing a unique incident serial number and details of the incident as reported. This enables units to:

- a. Verify that AINC has correctly recorded notified incident details.
- b. Confirm unit ownership of incident.
- c. When requested to do so, conduct a unit investigation<sup>124</sup> (using the Unit Investigation Report – AF510A) and, if necessary provide a Learning Account<sup>125</sup>.

16. In addition to reporting incidents to AINC, all deaths, serious injuries or significant losses of equipment capability are to be reported to DAIB. The POCs for reporting are as follows:

- a. Land domain: 03067 986587 – (manned 24/7). Follow-up email to: DSA-DAIB Land-Mailbox (MULTIUSER).
- b. Maritime and Air domains: 03067 988276 – (manned 24/7). Follow-up email to: DSA-DAIB-Air-Mailbox (MULTIUSER).

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<sup>123</sup> Currently BATSUB, BATUK and BATUS (2019).

<sup>124</sup> iaw JSP 375 Part 2, Vol 1, Chap 16.

<sup>125</sup> A Learning Account may be requested if the incident is unusual or a ASCen priority through the ASCen Watch List.

17. In the event of an ammunition incident including FFE violations, the following are to be notified:

- a. **UK.** Inform the Joint Services Explosive Ordnance Disposal Operations Centre (JSEODOC) Ammunition Incident Hotline, unless the civil police can confirm that they have already done so:

Didcot Mil: 94234 3360/3361/3362  
Didcot Civ: 01235 513360/513361/513362  
Fax Mil: 94234 3354 Civ: 01235 513354

- b. **Germany:**

(1) During working hours.

(a) Range incidents. The unit is to inform Range Control of the location and range where the incident has occurred. Range Control will request ATO assistance from Bielefeld.

(b) Other incidents. Other incidents where ATO assistance is required should be requested through the local RMP Unit.

(2) Outside working hours. Contact the nearest RMP Unit and request ATO support.

- c. **Rest of the World.** Units in Belize, Brunei, Canada, Cyprus, Falkland Islands and Kenya are to report all ammunition accidents direct to their local ATO (or nearest RMP unit who will assist in contacting the ATO).

d. **Exercises abroad.** When an ATO is deployed with exercising troops, units are to report all ammunition accidents direct to the ATO. When no local ATO support is available, units are to report all ammunition accidents to the Ammunition Incident Hotline.

e. **Other Defence/Army/Service Polices.** While it may be necessary to comply with JCCC Policy and Procedures, as described in Para. 5, there are also other Defence/Army/Service policies and procedures directed at specific activity that need to be adhered to such as Infantry Training Vol 4, Pam 21, Range Conduct and Safety Rules (Army Code 71080) – these take priority in the first instant; after which an appropriate AF510 should be submitted to the AINC as at Para. 2.

18. Details of the roles and responsibilities of the AINC are contained at Annex D with their Standard Operating Procedures (SOPs) held by the ASCen.

## Investigation

19. **Background.** The Management of Health & Safety at Work Regulations places a general duty on the MOD to record and investigate the immediate and underlying causes of all accidents/incidents to ensure that remedial action is taken, that lessons are learned, and longer-term preventative measures are introduced.

20. **DAIB.** The DAIB, having been notified of an event, will assess whether an investigation is required by them. If so, a team will deploy normally within 24hrs (UK) or 48hrs (overseas). They will contact the unit to arrange administrative details and the format of the investigation. The DAIB team are to be afforded full cooperation in the conduct of their duties.

21. **Army Safety Investigations.** Irrespective of a DAIB investigation, ASCen may request a Unit Investigation Report (AF510A) as at Annex B to this Chapter and, if the incident is of

particular importance, for the unit to produce a full Learning Account, the format for which is at Annex C to this Chapter. These may also be requested by other Army agencies such as APSG; however, an AINC copy **must** be included in the submission.

22. **AF510A.** The AF510A is part of the Army's Safe System of Work/Training (SSOW/T) and forms part of the mandatory investigation process for Serious and certain Specified Incidents and is intended to 'handrail' units through an investigation. This form will be sent to the originator of the AF510 for all incidents that carry the caveats of Serious and Specified injuries. It should be completed by a nominated unit representative<sup>126</sup> and returned to the AINC for electronic upload within 5 working days of receipt. It is completed in the same way as the AF510 (Incident Notification) and the incident summary will already have been completed by the AINC.

23. **Army Force Protection Advisers (AFPAs).** AFPAs will be tasked by the ASCen to conduct the investigation where the incident has been identified as one requiring more detailed analysis, such as those on the ASCen Watch list.

24. **Ordnance, Ammunition and Explosives.** All incidents involving ammunition will be investigated by ATO.

### **MOD Claims**

25. From time to time claims may be raised against the MoD following an accident where injury or loss has occurred. There is a clear legal requirement to provide documentary evidence to support MoD/other Solicitors in reviewing these claims. Units are often approached for copies of documentary evidence by such solicitors. It is important to note that Units or Establishments **must not** accept any responsibility for processing an individual's claim, or say anything that might be construed as accepting, admitting or denying liability for the incident giving rise to the claim. Units should refer the requesting solicitor to the AINC as the POC for the release of such documentation as may be required. The AINC may have further follow-up information not available to units. Information on the handling of claims is contained in [2019DIN06-011 – Guidance on Bringing a Common Law Claim for Compensation against MOD.](#)

Annexes to Chapter 10:

- A. Incident Notification Report (AF510).
- B. Unit Investigation Report (AF510A).
- C. Learning Account.
- D. Army Incident Notification Cell (AINC).

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<sup>126</sup> Usually the Unit Safety Adviser.

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**Annex A to  
Chapter 10 to  
ACSO 3216  
Dated Apr 19**

New 510 and 510A published date to TBC.

Please use current version until release date.

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## UNIT INVESTIGATION REPORT – AF510A

1. To facilitate better trend analysis into the root causes of accidents and incidents an AF510A has been introduced and is available on both MODNet and the Army Knowledge Exchange (AKX). This is part of the Army's Safe System of Work/Training (SSOW/SSOT) and forms a key element of the mandatory investigation process for Serious and certain Specified Incidents<sup>127</sup>.
2. The AF510A will be sent to the originator of the AF510 for all incidents that carry the caveats of Serious and Specified injuries. It will be partly completed by the AINC, using the original incident AF510, and the remainder should be completed and returned to the AINC for electronic upload within 5 working days of receipt. The AF510A should ideally be completed by the Unit Safety Adviser (USA) or their nominated representative, or the AFPA (if tasked by the ASCen), using a series of selectable sections each with a unique set of drop down menus. The form will expand as the information is entered in each section.
3. The Unit investigation should follow the following format:
  - a. **Overview.** A broad overview of the event; a summary of who, what, where, when and how. If there is a key issue, then this should be mentioned here. Detail, such as names of individuals, grid references etc., is not required here. The last line is to indicate the number and type of casualties by category.
  - b. **Background.** This should include a short synopsis of the provenance of the task or activity. Specified conventions are to be followed for names of people, equipment, vehicles<sup>128</sup>, locations<sup>129</sup>, grid references<sup>130</sup>, call signs<sup>131</sup>. Military terminology or jargon is to be minimised and cater for a mixed civilian/military readership – potentially a Coroner with little or no military experience. Footnotes are to be used to explain procedures and terminology in detail when it is thought necessary to provide clarity. Some of the factors that should be included here are:
    - (1) Detail of the area/location in which the incident took place.
    - (2) Include recent activity and leave dates as appropriate. Provide details that will indicate whether the personnel involved were suitably trained and qualified for the roles they took etc.
    - (3) Consider "risks" as widely as necessary – weather, terrain, equipment in use, level of supervision, adequate staff, and other factors.
    - (4) Any planning factors considered, or briefings received by the body of personnel that were undertaking the activity. Identify any applicable policy.
    - (5) Include any other specialist agencies, such as Civil Police, in response to an RTA.

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<sup>127</sup> [JSP 375, Part 2, Vol 1, Chap 16 – Annex A.](#)

<sup>128</sup> Put names of people, equipment and vehicles in BLOCK CAPITALS. Refer to serving personnel by rank then surname each time in full.

<sup>129</sup> All location names are to be written in full the first time they are mentioned, in BLOCK CAPITALS, followed by their abbreviation.

<sup>130</sup> Footnote grid references (GR) (do not place GR within the main body text).

<sup>131</sup> If appropriate, suffix an individual's Call Sign (C/S) after they are mentioned for the first time eg Sgt NOMINAL (C/S 30A).

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(6) Considerations would include factors such as duty patterns, training programme, fatigue, social considerations, relevant medical aspects and state of equipment in use.

- c. **What happened.** A description of the actions and decisions of the key players before, during and immediately after the incident. List events in chronological order and ensure that all known timings and dates are included. Details must be broken down logically and chronologically.
- d. **First Aid/medical arrangements.** This should outline in general the treatment delivered rather than a graphic description of the wounds.
- e. **Why the incident happened.** This is an opportunity to suggest why the event happened. The intent is to be objective and impartial. The purpose is not to apportion blame, but to highlight the contributory factors such as incorrect application of Tactics, Techniques and Procedures (TTPs) or an equipment failure.
- f. **Initial Issues Identified.** This part of the investigation process is to highlight what went wrong, what went right and any other information from which others might learn. However, units should refrain from making bold recommendations as these can be discussed with the Lessons desk and SMEs to ensure that they contain appropriate content for subsequent action or tasking.
- g. **Good Practice – Detail of Good Practice identified.** After all issues have been listed, any good practice that was noted, eg efficacy of PPE, should be listed using the format Observation – Discussion – Conclusion.
- h. **Immediate action taken to prevent recurrence.** This allows the unit and HQ to outline what activity they have taken, or will take, in seeking to avoid a recurrence. If the full circumstances of a recommendation have already been covered under the section above, simply note a title for the change and refer back to the relevant paragraph / sub-paragraph number. Immediate actions could include refresher training, adapting a TTP, changing the way a capability is used, distribution of literature as reminders, Urgent Statement of User Requirement (USUR) submitted for new capability, additional resource bid (ARB) made and so on. It is equally valid to state that there is nothing that can be done to avoid recurrence,
- i. **Personnel.** Details of 'personnel involved' in the incident should be included as an annex as a table and the investigation report (AF510A) produced should be at the lowest protective marking commensurate with the contents; preferably no higher than OFFICIAL.

## **LEARNING ACCOUNT**

1. The Learning Account allows detailed trend analysis to take place and provides recommendations to prevent a recurrence of the incident. Learning accounts should aim to investigate against the principles of the Safe System of Work/Training, ie Safe: Person, Equipment, Practice and Place, and should make recommendations to prevent recurrence.
2. Learning Accounts are to conform to the format set out in [ACSO 1118](#) for non-operational injuries and incidents. They may be requested by AINC as the third stage investigating process if the incident is unusual or of particular importance. This will be by an email to the Commanding Officer requesting that a Learning Account be raised. Additionally, Learning Accounts may be requested by other agencies such as DAIB or Formation SO1s FP if additional information not gathered through an AF510A is deemed necessary.
3. All accidents and incidents should be investigated, and the outcome of those investigations be sent to the AINC (and APSG and DAIB as requested). However, there are occasions when no report from the unit is required, which are as follows:
  - a. Sporting injuries.
  - b. Operational injuries and incidents already covered by ACSO 1118 reporting requirements. Non-Battle Injuries and incidents may still require a Learning Account to be produced.
  - c. Those injuries categorised as minor unless directed by ASCen.
4. ASCen/Army Lessons Process will use these as part of their information gathering exercise to inform themed ASCen Military Judgement Panel where the Army seeks to address the causes of incidents (3<sup>rd</sup> Loop Organizational learning), rather than the outcome of an incident (1<sup>st</sup> and 2<sup>nd</sup> Loop Organisational Learning).

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## **ARMY INCIDENT NOTIFICATION CELL (AINC)**

### **Role of the AINC**

1. The AINC is the focal point for the notification and data collation of all Army incidents, accidents, near misses, occupational ill health, serious equipment failures and dangerous occurrences including those involving fire, world-wide. AINC maintains the Army's Incident Notification System (INS); the repository for all incident reporting (AF510) and subsequent documentation<sup>132</sup>. It supports ASCen in carrying out its reporting requirements on behalf of the Army to the Defence Safety Authority (DSA) and UK statutory authorities, including the Health and Safety Executive (HSE) and the Environment Agency (EA)<sup>133</sup>.
2. The AINC is responsible for ensuring Army TLB's compliance with the statutory requirement for the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). Personnel deployed on Operations fall under the reporting requirements set by PJHQ/JFC and set out in mounting instructions where applicable. RIDDOR places a requirement for a death, major injury or dangerous occurrence being reported to the HSE as soon as possible. Any work-related injury resulting in over 7 consecutive days lost work time or incapacitation must also be reported within 15 days of the accident occurring/diagnosis. A RIDDOR submission may also be required for accidents and incidents that fall below the 7-day threshold but are between 3 days and 7 days lost work time.
3. The data collated by the AINC provides a mechanism for trend analysis for use by the Chain of Command to identify areas of risk in order to improve safety performance. The MOD Claims Directorate also makes extensive use of the AINC database when handling and settling claims, as do the Service Personnel & Veterans Agency to validate claims by Service personnel in respect of the Armed Forces Compensation Scheme (AFCS).
4. AINC contact details are:

Address:	AINC, ASCEN, Army HQ, IDL 2, Blenheim Bldg, Marlborough Lines, Monxton Road, ANDOVER, Hampshire, SP11 8HJ
Email:	Army SafetyCentre-AINC-mailbox (MULTIUSER)
Tel:	Mil: 94393 7645 / 7646 or Civil: 01264 887645 / 887646 <b>Cadet Forces:</b> Mil: 94393 7632 or Civil: 01264 887632
Fax:	Mil: 94393 6889 or Civil 01264 886889

<sup>132</sup> Such as AF510A, Learning Accounts, DAIB Triage reports, Service Inquiries etc.

<sup>133</sup> In cases of Fire, this is done by the Defence Fire and Rescue (DFR) who also notifies AINC.

**Definitions**

5. [JSP 375 Part 2 Volume 1 Chapter 16](#) provides the following definitions:

<b>Minor injury accident/incident</b>	Any injury, accident/incident that results in up to seven days lost time and is not reportable under RIDDOR or causes minor damage.
<b>Serious injury, accident/incident</b>	Any injury, accident/incident that results in: 1) More than seven days lost time (or unable to perform full range of duties) requiring medical treatment but not admission to hospital. 2) Requiring a formal report to the HSE under RIDDOR and is not a specified injury, accident/incident or dangerous occurrence. 3) Failure or corruption of safety measure or procedure (eg broken or damaged device). 4) Localised spillage or leak of pollutant eg short-term damage to flora and fauna. (see JSP 418).
<b>Specified Injuries</b>	Any injury, accident/incident that results in: 1) A fracture, other than to fingers, thumbs and toes. 2) Amputation of an arm, hand, finger, thumb, leg, foot or toe. 3) Permanent loss of sight or reduction of sight. 4) Crush injuries leading to internal organ damage. 5) Serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs). 6) Scalpings (separation of the skin from the head) which requires hospital treatment. 7) Unconsciousness caused by head injury or asphyxia. 8) Any other injury arising from work in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.
<b>Death</b>	Any accident/incident that results in a fatality.
<p><b>THIS IS NOT A DEFINITIVE LIST</b>  <b>– FOR FULL DETAILS OF DANGEROUS OCCURRENCES PLEASE REFER TO:</b>  HSE Reportable Incidents Web-Page.</p>	
<b>Dangerous Occurrences</b>	Any incident that results in: 1) The failure of any load-bearing part of any – <ul style="list-style-type: none"> <li>• Lifting machinery etc.</li> <li>• Freight containers.</li> </ul> 2) Any failure which has the potential to cause the death of any person relating to: <ul style="list-style-type: none"> <li>• Pressure systems.</li> </ul>

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	<ul style="list-style-type: none"> <li>• Electrical equipment/distribution systems.</li> </ul> <ol style="list-style-type: none"> <li>3) Any accident/incident which resulted or could have resulted in the release or escape of a biological agent likely to cause severe human infection or illness.</li> <li>4) Any unintentional fire, explosion or ignition involving explosives; or the unintentional discharge of a weapon.</li> <li>5) Any incident in which breathing apparatus malfunctions while in use, or during testing immediately prior to use.</li> <li>6) The complete or partial collapse of any scaffold which is more than 5 metres in height or erected over or adjacent to water.</li> <li>7) The accidental release or escape of any substance in a quantity sufficient to cause the death, specified injury or any other damage to the health of any person.</li> <li>8) An explosion or fire occurring in any plant or premises which results in the stoppage of that plant or as the case may be the suspension of normal work in those premises for more than 24 hours, where the explosion or fire was due to the ignition of any material.</li> <li>9) Total loss of system or facility for 24 hours or greater.</li> </ol>
<b>Near Miss</b>	An event that, while not causing harm, had the potential to cause injury, ill health or damage but not a RIDDOR reportable Dangerous Occurrence.
<b>Diseases</b>	<p>Diseases reportable to the HSE under RIDDOR include:</p> <ol style="list-style-type: none"> <li>1) Carpel tunnel syndrome.</li> <li>2) Severe cramp of the hand or forearm.</li> <li>3) Occupational dermatitis.</li> <li>4) Hand-arm vibration syndrome.</li> <li>5) Occupational asthma.</li> <li>6) Tendonitis or tenosynovitis of the hand or forearm.</li> <li>7) Any occupational cancer.</li> <li>8) Any disease attributed to an occupational exposure to a biological agent.</li> </ol> <p>Note: Certain occupational diseases must be reported, where these are likely to have been caused or made worse by their work.</p>

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## CHAPTER 11

### SAFETY AND ENVIRONMENTAL ASSURANCE

#### References:

- A. DSA01.1 – Defence Policy for Health, Safety and Environmental Protection.
- B. DSA01.2 – Implementation of Defence Policy for Health, Safety & Environmental Protection.
- C. ACSO 9001 – The Army Policy for Audit and Inspection.
- D. ACSO 9016 – Force and Environmental Protection Assurance.

#### Introduction

1. Safety Assurance can be regarded as the structures that have been put in place to ensure that the Secretary of State for Defence's Safety Policy is being implemented effectively. This will be achieved by confirming that there are robust Safety (Safety Management Plan(SMP), Fire Management Plan (FMP) and Environment Management System on Army Sites (EMSAS) at formation and unit level throughout the Army TLB.

#### Part 1

2. **Army Safety Centre (ASCen).** The ASCen is responsible for delivering Safety and Environmental Protection audit and assurance iaw with Reference C and maintaining the currency of Reference D. In addition, the ASCen is to:
- a. Conduct Army audit on overseas training establishments as required by Regional Command's Demand Signal.
  - b. Liaise with Defence Ordnance Safety Regulator (DOSR) to ensure that range assurance is reported.
  - c. Ensure consistency across Army TLB assurance (and audit).
3. **CS(A).** CS(A) is to direct the Army's S&EP Assurance policy including the appointment of a SQEP focal point<sup>134</sup>.
4. **HQs Home Command (HQ HC) and Field Army (HQ Fd Army).** HQ HC and HQ Fd Army are to ensure that they conduct suitable assurance of their respective 2\* HQs or as directed, but not less than biennially, utilising the ASCen question set (available on ARMS2) and record on ARMS2.
5. **2\* Formation Headquarters (2\* Fmn HQs).** 2\* Fmn HQs are to ensure that they conduct S&EP assurance audit<sup>135</sup> of their HQ within 6 months of the appointment of a new commander and record on ARMS2.
6. **Army Maritime Inspector (AMI).** The AMI is to carry out such inspections and audits of the Army's boats and Maritime assets as necessary to gain assurance of the effectiveness of the safety management arrangements and to record his findings on ARMS2<sup>136</sup>.

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<sup>134</sup> SO1 Assurance, ASCen.

<sup>135</sup> Using the Army Safety Centre (ASCen) authored Formation question set. An external audit can be organised through SO1 Assurance, ASCen, if required.

<sup>136</sup> Under the authority of his Letter of delegation from 2<sup>nd</sup> PUS.

7. **1\* Brigade Headquarters (1\* Bde HQs).** 1\* Bde HQs are to conduct assurance of their units iaw the RC Demand Signal ensuring that the results are recorded on ARMS2. They are to monitor unit self- assessments (through ARMS2) to inform the following year's estimate process.
8. **Regional Points of Command (RPOCs).** RPOCs are to provide a 6-monthly assurance update (through SO1 SHE, HQ RC) to the ASCen. This is in addition to their audit reports to units/Bdes.
9. **Units.** Units are required to conduct self-assessment in those years when no RPOC audit has been scheduled. Once completed these are to be loaded onto ARMS2.
10. **Audit Findings.** On receipt of their audit report, formations and units are to review and amend their formation/unit action plan with appropriate actions and timelines to address any issues identified. This action plan is to be reviewed at the Formation/unit safety committee.

## Part 2

### 11. Definitions:

- a. **Assurance.** Assurance is 'an evaluated opinion, based on evidence gained from review, on the organisation's governance, risk management and internal control framework'<sup>137</sup>.
- b. **Audit.** An audit is a 'systematic, independent and documented process for obtaining objective evidence and evaluating it...'<sup>138</sup>. All audit activity should be focussed on providing advice and assistance to Commanders/Head(s) of Establishment (HoE), identifying areas of risk that will inform their risk management process; audit should encourage good practice and inform a continuous improvement cycle. As an audit is conducted against a published standard, auditors do not necessarily need to be Subject Matter Experts (SME). In audit, there may be a degree of subjectivity<sup>139</sup>.
- c. **Inspection.** An inspection is a formal examination or review of performance and outputs, designed to assess effectiveness and to ensure fitness for purpose and defined as a 'determination of conformity to specified requirements'<sup>140</sup>. The requirement for inspection will normally be imposed by national or international legislation or by a licensing authority in order to licence an activity, capability or facility. Unlike an audit, it is objective. An inspection usually results in a pass/fail grade and should be carried out by an SME.

12. **Force and Environmental Protection Audits (FEPA).** FEPAs are scheduled in accordance with the 1\* Annual Estimate, promulgated through RC's Annual Demand Signal and usually conducted by Bde RPOCs' SO2 SHE and SO3 SD who form small audit teams. Occasionally auditors may be drawn from other organisations such as 2\* Formation HQs and SO1 Assurance/SO2 EP from the ASCen.

13. **Question Set (QS).** The audit QS is maintained by the ASCen<sup>141</sup> and is updated annually by 1 Jan after which it is then loaded onto ARMS2 overwriting the previous QS.

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<sup>137</sup> [JSP 525: Corporate Governance, Part 2 \(Beta V1.0\), July 15.](#)

<sup>138</sup> [ISO 9000:2015\(E\).](#)

<sup>139</sup> Less for financial audit, which is an objective examination and evaluation of the financial statements to make sure that the records are a fair and accurate representation of the transactions they claim to represent. It can be facilitated internally at unit level by a suitably trained officer, or externally by an outside agency.

<sup>140</sup> [ISO 9000:2015\(E\).](#)

<sup>141</sup> SO1 Assurance.

14. **Consistency.** The ASCen is responsible for monitoring and ensuring consistency across the Army TLB which will be achieved by accompanying each RPOCs on one audit annually.

15. **Arduous Army Training (AAT).** Having amended the policy, it is important that implementation is assured through [ACSO 9018 \(Physical Development Audit\)](#) providing assurance that the new policy is being appropriately implemented by commanders:

Ser	Audit Intensity			Standards	Reference
	Light	Medium	Full		
12.	X	✓	✓	Is the unit conducting or planning to conduct training which breaches the threshold of Arduous Army Training?	ACSO 3216
13.	X	✓	✓	Are risk assessments and mitigations in place for Arduous Army Training.	

16. **DSA Regulators.** The DSA through its regulatory activities has an important part to play in S&EP. Any unit or formation that receives a DSA assurance visit is to inform the ASCen ASAP as well as the appropriate SO1 SHE/FP.

17. **Continuous Improvement.** The Army's robust Assurance regime provides a unique opportunity to deliver continuous improvement across units, formations and estate. Therefore, the sharing of positive assurance reports is to be encouraged.

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## CHAPTER 12

# SAFETY AND ENVIRONMENTAL PROTECTION LESSONS PROCESS

### Introduction

1. To develop and maintain a positive, pro-active safety culture, the delivery of the safety and EP lessons process (S&EP LP) is the key output for the safety matrix across the Army to prevent incidents<sup>142</sup> and drive continuous improvement. The Army's safety Organisational Learning (OL) process is based on the Army Lessons Process contained within [ACSO 1118 – Army Lessons Process](#). To become an effective OL organisation, and therefore adopt a pro-active safety culture, the Army's safety matrix is to enact the following

### Part 1

### Roles and Responsibilities

2. **Army Safety Centre (ASCen).** The Role of the ASCen is to deliver the Army's S&EP Lessons Process at the Third Loop through the development of S&EP themes, the identification of weak signals<sup>143</sup>, scope the categorisation of the unit and formation recommendations creating the activity and evidence for scrutiny at an ASCen Military Judgement Panel (MJP). Responsibilities are:

a. **Chief Safety (Army)(CS(A)).** CS(A) is responsible for directing the Army's S&EP Lessons Process and chairing the ASCen MJPs.

b. **SO1 Safety Lessons and Investigations (SO1 SLI).** SO1 SLI is responsible for:

(1) The organisation, arrangements and delivery of the Army S&EP lessons process including:

(a) Categorisation of recommendations;

i. Cat 1 – unit only;

ii. Cat 2 – requires further investigation (thematic or weak signal);

iii. Cat 3 – potential organisational lesson identified<sup>144</sup>.

(b) All recommendations are to be recorded on the Incident Notification System against the senior identified incident<sup>145</sup>.

(c) The development and maintenance of the Army Safety Centre Watch List<sup>146</sup>.

(2) The arrangement, organisation and deliver of quarterly ASCen MJPs to investigate identified themes and formulate and agree the lesson/observation with the

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<sup>142</sup> Incident includes accident, incident, near misses and dangerous occurrences.

<sup>143</sup> Weak signals across the Army TLB that may not be apparent at Fmn/unit level.

<sup>144</sup> Leading to possible input into the Defence Lessons Identified Management System (DLIMS) as a lesson or observation.

<sup>145</sup> The incidents identified to support the MJP theme are to be linked within INS by the SO2 Lessons, Army Safety Centre.

<sup>146</sup> Army Safety Centre Watch List to consist of the top 6 threats to the delivery of Army capability.

relevant stakeholders and SMEs including the identification of appropriate Senior points of authority (SPAs) and Supporting Action Managers (SAMs).

(3) To act as the ASCen focal point for all S&EP investigations including liaison with the Defence Accident Investigation Branch (DAIB), APSG and the Army Safety Matrix.

(4) To identify, promulgate and exploit best practice across the Army TLB.

c. **Headquarters Home Command (HQ HC) and Headquarters Field Army (HQ Fd Army).** SO1 SHE, HQ HC and SO1 FP, HQ Fd Army are to conduct a regular review of their formation MJP findings<sup>147</sup> and submit a consolidated report to the Army Safety Centre<sup>148</sup> on a quarterly basis.

d. **2\* Headquarters (2\* HQs).** SO1 SHEs/SO1 FPs, 2\* HQs, are to conduct a regular review of the incidents within their formations:

(1) Using the Army Safety Centre Weekly Summary and Formation Monthly Reports.

(2) Utilising the MJP process and recording their findings and action plans.

(3) Submit their minutes including findings to their respective 3\* HQs.

(4) Report their MJP outputs at Fmn Command Boards.

e. **Army Force Protection Advisers (AFPAs).** AFPAs are to conduct monthly reviews of the incidents, investigations and recommendations across their unit portfolios and to submit a consolidated return to SO1 Safety Lessons and Investigations, ASCen, copied to their respective SO1 SHEs/FPs.

f. **Units.** Unit Safety Advisors are to regularly review their unit safety and environment protection performance on both operations, training and routine actives. They are to investigate incidents in line with the direction given in [JSP 375, Ch.16](#)<sup>149</sup>.

g. **Cadet Forces.** Cadet Forces are to adopt a suitable S&EP lessons process that subscribes to the principles within ACSO 1118 and the general direction here. Cadet Forces are to submit their findings (lessons identified and action plans) to the ASCen biennially and one month before the Army Safety Sub Committee (ASSC).

## Part 2

3. The Army S&EP lessons process is based on [ACSO 1118](#) utilising 'Triple Loop' Organisational Learning (3LOL) methodology shown diagrammatically at Annex A and described as:

a. **Single Loop Learning (Units).** Single Loop learning is synonymous with the routine repetitive issues that help us to do our everyday jobs. Single Loop learning (reacting and improving efficiency) is based on reacting to an event, action, unintended consequence or deviation from a plan that requires changes in behaviour, drills or Techniques, Tactics, Procedures (TTPs) to achieve activity and/or performance goals. It is normally run at the tactical activity, local or project level. It reflects on 'are we doing things right' and 'could we do things better'.

<sup>147</sup> MJP findings should include minutes, lessons, observations and recommendations identified.

<sup>148</sup> Using: [ArmySafetyCentre@mod.gov.uk](mailto:ArmySafetyCentre@mod.gov.uk); FAO: SO2 Safety Lessons & Investigations.

<sup>149</sup> [JSP 375, Pt 2 Vol 1, Ch. 16](#) (to become DSA 03.1 (TBC)).

b. **Double Loop Learning (Formations 2\*)**. Double Loop learning (understanding and improving effectiveness) questions the underlying assumptions behind actions and behaviour, examines the reason behind why the initial change that was required to identify a root cause and whether a second order change is required. This may result in changes to an approach, plan or capability<sup>8</sup> to improve effectiveness. This loop requires analysis, creative and critical thinking and asks the question 'are we doing the right things' and 'could we be doing things differently and/or different things'.

c. **Triple Loop Learning (Army HQ)**. Triple Loop learning (transforming) is operating at a higher level; it develops the organisation's ability to learn about learning. Triple Loop learning should answer to the question 'how we decide what is right?' It reflects on what we have learnt and how, and what we can learn from that. Triple Loop learning may therefore suggest changes in an organisation's thinking, its operating philosophy, principles and environment as well as its learning processes and training.

## Army HQ

4. **Army Safety Centre (ASCen)**. Within the 3LOL methodology, the ASCen has a strategic responsibility (not day to day) placing greater emphasis on the role of informed, evidence-based analysis, critical thinking and challenge in decision making and risk management. This requires the use of a systems thinking/approach and subsequently the sharing of that which has been learnt. To achieve this the ASCen utilise the Safety Management Operating Model shown at Annex B.

5. **ASCen Watch List**. The ASCen Watch List contains the top 6 S&EP threats to the delivery of Army capability based on lost 'man days' across the Army TLB. This may include Risk to Life (RtL) activities if it is shown that the activity is having an immediate or long-term impact. The ASCen Watch List is evidentially directed by CS(A) and maintained by SO1 SLI. It is scrutinised at the Army Safety and Environmental Working Group (ASEWG) and reviewed at the Army Safety Sub Committee (ASSC) along with the appropriate S&EP action plan.

6. **ASCen MJP**. In order to deliver effective safety management, the ASCen utilises the MJP process to address S&EP issues. The MJPs are thematically based bringing together all key stakeholders across all DLoDs. They are chaired by CS(A) (minimum rank of OF5) or, in their absence, by DCS(A)(OF4) and held on a quarterly basis or as frequent as necessary to address the systemic issues identified. The outcome of an ASCen MJP is a series of recommendations and/or observations to address the issue along with nominated SPAs and SAMs with a clear timeline for action.

7. **Defence Lessons Identified Management System (DLIMS)**. The ASCen MJPs will utilise the Defence Lessons Identified Management System (DLIMS) to record all lessons and/or observations. This also includes the nominated Senior Points of Authority (SPA) and Supporting Action Managers (SAM).

8. **ASEWG**. All MJP outputs are reported to the ASEWG and scrutinised by the ASSC. ASCen MJPs are to be included as a standing agenda item at the ASEWG to raise awareness of the issue – lessons identified and observations; and to highlight future themes.

9. **Best Practice**. The ASCen is to improve operational performance and effectiveness and risk mitigation or opportunity exploitation through the circulation of BEST PRACTICE through knowledge sharing. This requires an understanding of its audience(s) (when and what is required and in what format) and a means of sharing (both push and pull), requiring a mix of physical and electronic activities to be effective. Electronic sharing requires a set of knowledge support tools (publications and Army Knowledge Exchange (AKX)), a lessons repository (DLIMS) and a knowledge library (SharePoint) with underpinning information processes.

## HQs Home Command and Field Army

10. The 3\* Commands have a pivotal role to play within the S&EP LP providing the bridge between the 2<sup>nd</sup> (2\* HQs) and 3<sup>rd</sup> (Army HQ) loop involving the requirement to identify emerging trends and themes within their commands, both potentially with different emphases. If it is a systemic issue (or broader lessons can be drawn) then by default, it becomes an Army HQ issue. Therefore, it is imperative that the 3\* Commands<sup>150</sup> scrutinise and comment on their 2\* MJP reports before passing them onto the Army Safety Centre.

### 2\* HQs

11. The 2\* HQs (through their SO1 SHEs/FPs) are the key deliverer of 2<sup>nd</sup> loop S&EP OL addressing individual or grouped incidents within the formations. They are to use the MJP process and record their outputs, lessons identified, recommendations or observations in a formal report to their respective 3\*HQ. The MJPs should include a suitable representation from across the formation such as 1\* HQ and unit representatives.

12. 2\* HQs are also to use this mechanism to initiate investigations where they consider it necessary or where the submitted Unit Investigation Report (AF510A) does not, in their opinion, contain sufficient detail. If a more thorough investigation is required, they can request a Learning Account.

13. The 2\* HQ MJPs should also use this opportunity to close incidents if no further action is required at which point the Army Incident Notification Cell (AINC) should be informed on the AINC Group Mailbox: **Army SafetyCentre-AINC@mod.gov.uk**

14. **SO1 SHEs/FPs.** SO1 SHEs/FPs are to ensure that a suitable internal mechanism exists within the Chain of Command, such as Command Board, to raise awareness of S&EP issues along with any remedial or pre-emptive action required to address S&EP concerns.

15. **Units.** Unit responsibilities are outlined in Ch 1, Para 15n. However, it is imperative that the CO and/or Head of Establishment (HoE) is aware of their responsibilities including those of investigation within JSP 375<sup>151</sup>. All unit investigations, unless specifically directed otherwise, are to be conducted using the Unit Investigation Form (AF510A) and, once signed off by the CO, sent to the AINC using the group mailbox: **Army SafetyCentre-AINC@mod.gov.uk** and **copied** to their respect higher HQ.

Annexes to Chapter 12:

- A. The Triple Loop Organisational Learning Diagram.
- B. The Army Safety Centre Safety Management Model.

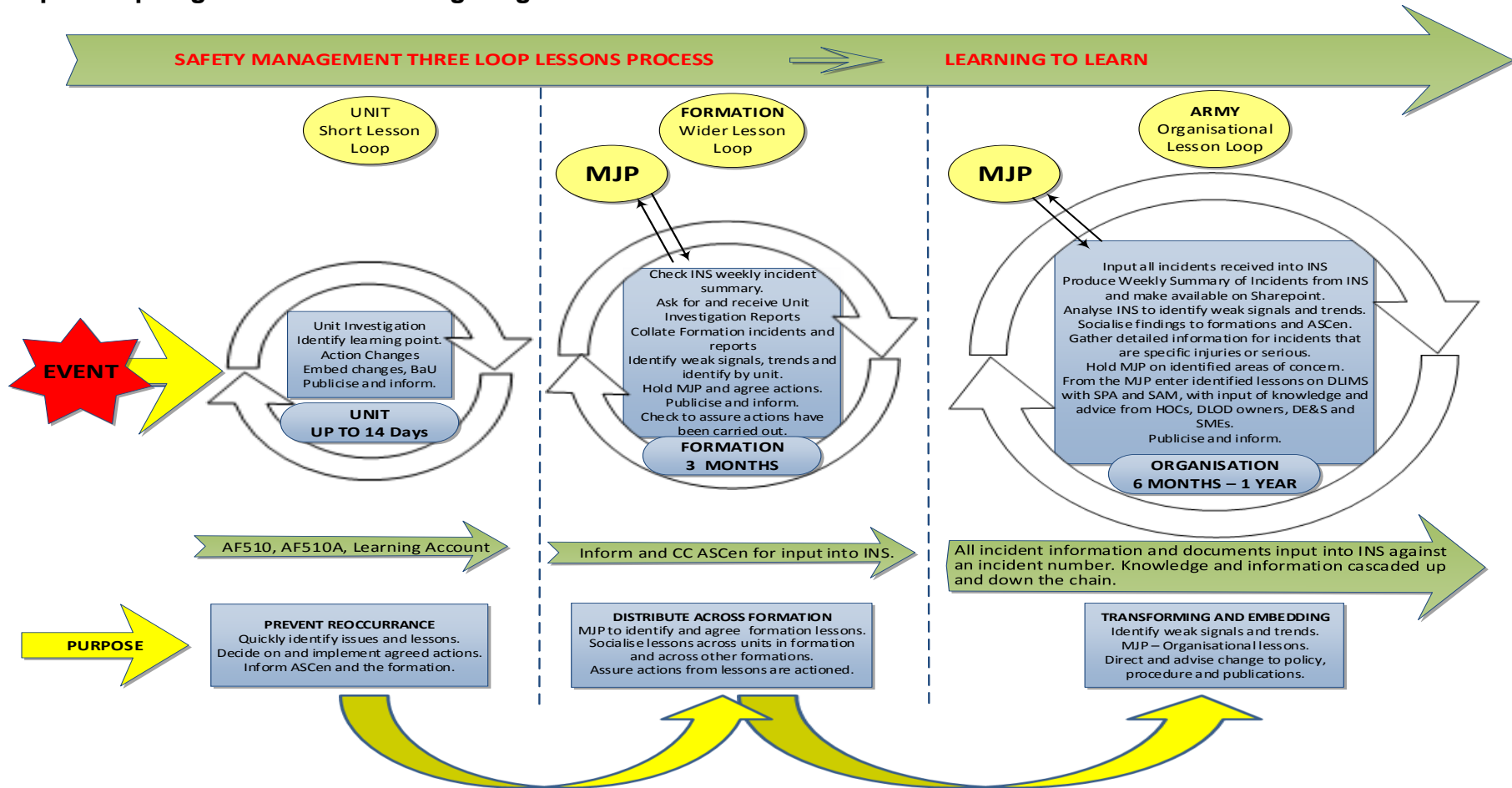
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<sup>150</sup> Through SO1 SHEs/FPs.

<sup>151</sup> All Serious or Specified incidents are to be investigated with Minor incidents at the CO's/HoE's prerogative.



The Triple Loop Organisational Learning Diagram



The Army Safety Centre Safety Management Model

