

JSP 815

Element 1: Leadership Governance and Culture



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Amendment record

This element has been reviewed by the Directorate of Defence Safety (DDS) together with relevant subject matter experts and key safety stakeholders. Any suggestions for amendments should be sent to COO-DDS-GroupMailbox@mod.gov.uk.

Version	Date	Text Affected	Authority
No	Published		
1.0	Dec 22	BETA version for consultation	Dir HS&EP
1.1	31 May 23	Final version	DDS
1.2	10 Sep 24	Annual revision and combined element and assurance framework	DDS

Terms and definitions

General safety terms and definitions are provided in the <u>Master Glossary of Safety Terms</u> and <u>Definitions</u> which can also be accessed on <u>GOV.UK</u>.

Must and should

Where this element says must, this means that the action is a compulsory requirement.

Where this element says should, this means that the action is not a compulsory requirement but is considered good practice.

Introduction

1. This element provides the direction that must be followed and the guidance and good practice that should be followed and will assist users to comply with the expectations for leadership, governance and culture that are set out in this Element.

Purpose and expectations

2. This element focuses on the extent that an organisation is forward-thinking and that it has clear aims and objectives about what it wants to achieve. Together with effective leadership and governance methods organisations are to promote a consistent approach to safety management at all levels and support a positive, proactive culture of reporting and learning. This is to be supported by establishing accountability based on well-defined authority levels and a clear understanding of responsibilities.

Promoting a consistent approach to safety management

Leadership

- 3. The Secretary of State's (SofS) Policy Statement for Health, Safety and Environmental Protection (HS&EP) applies to everyone within Defence, including contractors and partner organisations. The Policy Statement is a commitment of the SofS's personal leadership in HS&EP and as such the SofS relies on all those in leadership roles to make sure the policy is applied. Senior leaders of Defence organisations are to lead on HS&EP through the responsibilities set out in their letters of delegation issued by the Permanent Secretary (or equivalent delegated authority).
- 4. The SofS's Policy Statement identifies the key requirements and high-level responsibilities for Health Safety and Environmental Protection (HS&EP) which applies to all Defence activities and personnel. The Defence Safety Management System (SMS) Framework (JSP 815) amplifies the SofS Policy Statement and describes the safety direction and guidance to be followed by Defence organisations.
- 5. The senior leader of each Defence organisation must set down and implement safety management arrangements through a Defence organisation SMS for the activities under their areas of responsibility. The Defence organisation SMS must reflect the policy requirements of the Defence SMS Framework.
- 6. Leadership should demonstrate a commitment to safety within their organisation by setting a clear tone from the top, promoting the Defence vision for safety and by:
 - a. taking overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of safe and healthy workplaces and activities:
 - b. making sure that they are visible across their organisation and by prioritising safety alongside other strategic objectives;
 - c. communicating the importance of effective safety management and of conforming to the Defence SMS Framework and the Defence organisation's SMS requirements using a range of communication methods;
 - d. regularly reviewing safety performance at leadership meetings and bidding for the necessary finance and resources to maintain a safe workplace;

- e. developing, leading and promoting a culture in the organisation which supports the intended outcomes of the Defence SMS Framework and the Defence organisation's SMS;
- f. ensuring the organisation establishes and implements processes for continuous engagement via consultation, training and participation of the workforce and other stakeholders;
- g. encouraging the workforce and stakeholders to identify areas for improvement, leading to continual improvement in risk management through collaboration and innovation;
- h. promoting the open and transparent reporting occurrences, hazards, risks and opportunities; and
- i. driving continuous improvement of safety performance management and effective oversight of action plans.

Governance

- 7. The Defence Safety and Environment Committee (DSEC) is the principal forum within Defence responsible for the governance of safety. The DSEC is supported as necessary by sub-committees and working groups comprised of representatives of the DSEC members and safety representatives from other Defence organisations.
- 8. Defence organisations are to establish their own governance arrangements and framework. The Defence organisation's governance arrangements should include a hierarchy and structure of safety forums with agreed terms of reference, a timetable of scheduled meetings and a formal communication route that is understood by the organisation. Safety forums are covered in more depth in Element 2 (Organisations and Dependencies) of this JSP.
- 9. Safety governance within Defence organisations should provide leadership oversight, challenge and review of safety policies, procedures, performance and effectiveness of the Defence organisation's SMS.
- 10. In its most basic form, the Health and Safety Executive (HSE) recommends the Plan, Do, Check, Act framework for managing health and safety (see HSE guidance note HSG 65 for more information). It assists Defence organisations in achieving a balance between the systems and behavioural aspects of management and treats health and safety as an integral part of good management.

11. Examples of some Defence organisation activities using the Plan, Do, Check, Act approach are shown in the following table:

Plan, Do, Check, Act	Safety management activities	Examples (not an exhaustive list)
PLAN	Determine your policy / Plan for implementation	 Consider where you are now and where you need to be. Define what you want to achieve and who will be responsible for delivering that outcome. Define and communicate acceptable performance and the resources required.
DO	Profile risks / Organise for health and safety / Implement your plan	 Identify and assess your risks and identify control measures. Organise your activities to deliver your plan / involve workers and communicate. Implement and manage control measures. Train and instruct, to ensure everyone is competent to carry out their work and supervise to make sure that arrangements are followed.
CHECK	Measure performance (monitor before events, investigate after events)	 Make sure your plan has been implemented. Measure and review performance. Assess how well the risks are being controlled. Investigate the causes of safety occurrences.
ACT	Review performance / Act on lessons learned	 Review your performance. Learn from measurements and findings of investigations. Revisit the plan, policy documents and risk assessments to see if they need updating. Take action on lessons learned, including from audit and inspection reports.

Safety culture

- 12. Leaders in Defence set the strategic direction for safety which influences how individuals within Defence behave in relation to safety and defines the culture of the organisation.
- 13. Culture can be best understood as "the way we do things around here". The HSE Advisory Committee definition of safety culture is; "The safety culture of an organisation is the product of individual and group values, attitudes, perceptions, competencies and patterns of behaviour that determine the commitment to, and the style and proficiency of, an organisation's health and safety management". A safety culture builds slowly, but behaviours are influenced quickly through strong leadership, messaging, expectations, and examples, this is known as the 'tone from the top'.
- 14. Building a strong culture of safety is vital to prevent accidents, injuries and deaths. Defence organisations should show genuine care to those who deliver Defence activities, support open and honest reporting and set a culture where everyone feels able to speak up before and not just after things go wrong, rather than fearing blame. They should maintain policies and processes that develop and promote a positive safety culture throughout their organisation and area of responsibility, they should share and effectively communicate good practice and any safety lessons identified in order to promote and support continuous improvement.

Clear aims and objectives

- 15. Defence organisations have flexibility to describe the elements of a strong safety culture using their own language. However, clear aims and objectives are important as they ensure that all stakeholders are aligned and all involved parties take the right steps in achieving an effective safety culture. The following steps should be taken by Defence organisations to achieve this:
 - a. leaders should set clear expectations and communicate a 'tone from the top' based around their 'duty of care' for the health, safety and wellbeing of their people;
 - b. leaders at all levels should be visible and proactive in promoting safety;
 - c. their safety policies and procedures should be maintained, continually monitored and improved to mitigate human error;
 - d. there should be open and honest reporting of health and safety concerns by stakeholders at all levels. A 'Just Culture' that includes learning, questioning and flexible behaviours should be actively promoted, supported and maintained. A just culture is the cornerstone in ensuring that such errors are dealt with fairly and appropriately, where personnel are supported to learn from their actions;
 - e. lessons identified within one area should be effectively communicated across all areas (e.g., from occurrence reporting / investigations / trends). Human factors should be appropriately considered within their SMS to understand what lessons can be learned from occurrences and how to adapt in the future; and
 - f. the management of safety should be embedded throughout their organisation which should include two-way communication, constructive challenge, open reporting and decision making which is transparent and responsive.
- 16. A safety culture is not something to impose on others, but a product of facilitating and inspiring enduring safety behaviours. Defence organisations with a positive safety culture should have the following characteristics:
 - a. a low number of routine procedural violations;
 - b. effective reporting of safety occurrences;
 - c. effective feedback and learning from safety occurrence reporting;
 - d. proactive rather than reactive responses to safety occurrences and regulatory interventions;
 - e. compliance with the Defence SMS Framework; and
 - f. management decisions that consistently consider safety whilst planning or undertaking Defence activities.
- 17. The establishment of a positive safety culture within an organisation is dependent on the following:
 - a. **Management commitment**: This commitment produces higher levels of motivation and concern for safety throughout the organisation. It is indicated by the proportion of resources (time, money, people) and support allocated to safety management and by the status given to safety versus delivery/output, cost etc. The active involvement of senior management in the safety system is vital.

- b. **Visible management**: Senior managers and leaders need to be seen to lead by example when it comes to safety. Good leaders appear regularly on the 'shop floor', talk about safety and visibly demonstrate their commitment by their actions. It is important that leaders are seen as committed to safety through both their words and their actions.
- c. Good communications between all levels of personnel: In a positive culture questions about safety should be part of everyday work conversations. Leaders should not only ask but, listen actively to what they are being told by personnel with regards to safety, and take what they hear seriously. Active personnel participation in safety is important, to build ownership of safety at all levels and exploit the unique knowledge that personnel have of their own work. This can include active involvement in workshops, risk assessments, plant design etc. In organisations with a good safety culture, personnel and leaders will be consistent, and safety is seen as a joint exercise to help change things for the better.
- d. **Effective decision making**: Safety needs to be fully embedded within all aspects of an organisation's evidence-based decision-making processes to ensure that the safety impact of any decisions is considered and understood.
- 18. A safety culture and behaviour survey can be used as a tool for measuring an organisations safety culture. Where a safety and behavioural survey is used, the results should be reviewed by the team commissioning and organising the survey(s); and corrective actions should be proposed to leadership.

Using the Parker-Hudson Ladder in the context of culture

- 19. The Parker-Hudson Ladder is a framework to assess an organisation's safety culture, this is shown diagrammatically in Figure 1. Each level has distinct characteristics and is a progression from the previous level. Defence organisations should aim to have a Generative safety culture where all stakeholders are informed and take accountability for their actions.
- 20. Hudson further defines each level of culture as follows:
 - a. **Pathological safety culture**: Safety is a problem caused by the workers. The drivers are the business and a desire not to get caught by the regulator.
 - b. **Reactive safety culture**: Organisations start to take safety seriously, but action is taken only after incidents.
 - c. **Calculative safety culture**: Safety is driven by management systems, with much collection of data. Safety is still primarily driven by the management and imposed rather than looked for by the workforce.
 - d. **Proactive safety culture**: With improved performance, the unexpected is a challenge. Workforce involvement starts to move the initiative away from a purely top-down approach.
 - e. **Generative safety culture**: There is active participation at all levels. Safety is perceived to be an inherent part of the business, and safety-based solutions are welcomed as adding value and sustainability to the organisation. Safety challenges are tackled with innovative solutions.

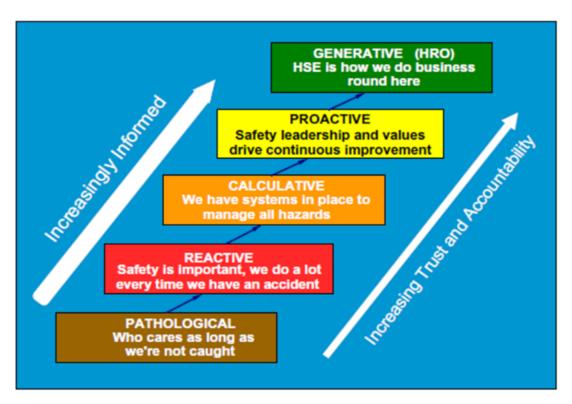


Figure 1 - Parker-Hudson Ladder

Establishing roles and responsibilities

21. The people listed in Table 1 as follows are responsible for safety in an organisation, this list is not exhaustive:

Role	Responsibility
The Secretary of State for Defence	The SofS is regarded as the employer for the purposes of complying with the requirements of UK HS&EP legislation. They are answerable to Parliament for ensuring Defence complies with this duty as set out in a Policy Statement which identifies the key requirements and high-level responsibilities for HS&EP management. The Policy Statement is the Defence policy for complying with HS&EP requirements and applies to all Defence activities and its personnel.
The 2 nd Permanent Under Secretary	As the Department's most senior official for safety matters, the 2 nd Permanent Under Secretary (2PUS) is to ensure that effective management arrangements and resources are in place to achieve compliance with the SofS Policy Statement. 2PUS is to include safety performance in the Department's holding-to-account process.
The Chief Operating Officer (COO)	The Chief Operating Officer (COO) leads on developing functions and functional integration for Defence, enables the Head Office to operate effectively and is the Defence Safety Function owner.

The Director of Defence Safety (DS)	The Director of Defence Safety (DS) is the Defence Safety Function leader and the owner of the Defence Safety Functional Strategy, Operating Model, the overarching Defence Safety Management System (Defence SMS) Framework (JSP 815) and Defence safety policy (JSPs 375 and 376). The Director DS is responsible for the corporate governance of MOD safety, on behalf of 2PUS and reviews Defence organisations' risk reporting and safety performance. The Director DS is Head of Profession for safety and leads on the profession's approach to safety training.
The Director General, Defence Safety Authority (DG DSA)	The Director General, Defence Safety Authority is empowered through a Charter with the SofS as the independent Defence regulator and has the following responsibilities: a. Empower suitably qualified and experienced Crown servants to regulate safety for Defence activities in the UK where it has disapplications, exemptions or derogations from UK statutory requirements and Defence activities overseas, outside of the requirement to respond to host nations' relevant safety expectations and co-operate with their safety authorities;
	b. To be the primary Convening Authority (CA) for Service Inquiries (SIs) into safety related fatalities, serious injuries and significant loss of major capability. To support in this function, DG DSA maintains the Defence Accident Investigation Branch (DAIB);
	c. As the Defence Authority for safety setting standards through the creation of regulation and taking assurance of compliance measures by Defence organisations where Defence has disapplications, exemptions or derogations through the Defence Regulators;
	d. Providing independent advice to the SofS on safety policy in Defence and with evidence-based assurance that the policy is being promoted and implemented in the conduct of Defence activities; and
	e. Providing the Defence Board with information on safety matters and an Annual Assurance Report (AAR).
Defence organisations senior leader	The most senior leader in each Defence organisation should lead on safety through the responsibilities set out in their letters of delegation issued by the Permanent Under Secretary.
Defence organisation Safety Centre	Each Defence organisation has established a Safety Centre or equivalent that is generally headed up by a Safety Director or Chief of Safety and is staffed by safety professionals from within the Defence organisation.

Chief Environment and Safety Officer	Under the Health and Safety at Work etc Act 1974 (HSWA74) senior leaders of Defence organisations must appoint a competent person to assist them manage Health, Safety and Environmental Protection within their organisation. This role is typically provided by the Chief Environment and Safety Officer (CESO) or an equivalent competent person. They are required to provide advice on and assurance of compliance with legislation, Defence safety policy and regulations, they are also the Defence organisations point of contact for liaising with statutory and Defence Regulators.
Role of Duty Holders	Duty Holding is to be applied for military activities that the Defence organisation's most senior leader considers: a. are justified and present a credible and reasonably foreseeable Risk to Life (RtL); and b. the Duty of Care, other statutory arrangements and the control of risks are considered to be inadequate and require enhanced
	safety management arrangements; or
	c. are mandated through Regulation.
	Please refer to Element 5 of this JSP for further details on Duty Holding.
Duty Holder- facing organisations responsibilities	Duty Holder-facing organisations are organisations that provide equipment, services or infrastructure or other support required by the Duty Holder in mitigating RtL, for equipment and platforms this may be DE&S and for infrastructure this may be DIO.
	Please refer to Element 5 of this JSP for further details on Duty Holder-facing organisations.
Defence Contractor responsibilities	Where Defence Contractors undertake work or provide services directly in support of Defence activities, they are to comply with relevant safety legislation, the requirements of the SofS's Policy Statement and with relevant Defence regulation and policy. Please refer to Element 5 of this JSP for further details on
	contracting.
Employee responsibilities	All Defence employees have legal responsibilities in UK health and safety legislation to take reasonable care for their health and safety and that of any other persons who may be affected by their acts or omissions at work.
	Defence employees are also required to co-operate with their line management or chain of command to make sure that their legal responsibilities are complied with. In doing so, no employee is to intentionally or recklessly interfere with or misuse anything provided in the interests of their health, safety or welfare. Employees are also required to comply with the requirements of the SofS's Policy Statement.

Table 1 - Organisation safety roles and responsibilities

Element assurance framework

- 22. This element focuses on the extent to which a Defence organisation has a vision, clear aims and objectives about what it can and wants to achieve in terms of safety. Together with effective leadership, governance methods promote a consistent approach to safety management at all levels and support a positive, proactive culture of reporting and learning. This is supported by establishing accountability based on well-defined authority levels, acceptance of decision-making and a clear understanding of responsibilities.
- 23. The expectations and performance statements for this element are set out in the following pages.

Expectations and performance statements

Element 1: Leadership Governance and Culture

The Expectations in this element are:

- **E1.1** Leadership sets the "tone from the top" and actively demonstrate their commitment to safety.
- **E1.2** Leadership promotes a culture of continual improvement, speaking up and embedding transparent and open reporting.
- **E1.3** Leadership sets clear safety responsibilities by which the Defence organisation is measured and held to account.
- **E1.4** Leadership is visible at all levels of the Defence organisation; including through direct interactions with the wider workforce and other stakeholders on matters of safety.
- **E1.5** Corporate governance holds safety as an equal partner to other strategic objectives such as capability, cost and schedule.
- **E1.6** A culture is in place which fosters resilient safety management, engages people, and promotes effective safety behaviours.

Documents often associated with this element:

- Agenda and minutes of the safety committee meetings (Strategic, Tactical and Working)
- Annual Budget Cycle (ABC) planning (for inclusion of safety requirements)
- Command / Corporate plan
- Continual Improvement (CI) logs
- Contract management and supply chain management plans
- Corrective action plans
- Defence organisation business plans
- Defence organisation Operating Model
- Defence organisation SMS
- Delegations / letters of appointment and formal acceptance
- Establishment Management Plans
- Safety Organisation and Arrangement (O&A) statement
- · Safety cultural surveys
- Joint Basing Arrangements (JBAs)
- Key Performance Indicator (KPI) targets and metrics
- Memorandums of Understanding (MOUs)
- People survey or equivalent e.g., Attitude Survey
- Review period of KPIs by a governance forum
- Senior Leadership Team (SLT) walk arounds & townhall briefings
- Service Level Agreements (SLAs)
- Organisation safety priority commitment/action plan

Expectation 1.1 Leadership sets the 'tone from the top' and actively demonstrate their commitment to safety.

Unsatisfactory	Limited	Moderate	Substantial
 There is little or no evidence of effective leadership relating to safety. Employees are not consistently aware of the Defence organisation's safety goals. 	 There is some, but not enough evidence of leadership messaging relating to safety that inspire others within the Defence organisation. There is some, but not enough evidence to show that employees understand how they contribute to achieving the Defence organisation's safety goals and act accordingly. 	 There is some evidence of leadership behaviours that inspire others within the Defence organisation to work to deliver against the safety vision of the organisation. There is some evidence to show that employees know how they contribute to achieving the organisation's safety goals but with minor weaknesses in understanding the organisation's relevant policies and vision of the senior team and acting accordingly. 	 Leadership have set a vision and a clear tone for the top on safety. Leadership is visible in the workplace and demonstrate their commitment to safety not just through words but via their individual actions and behaviours that clearly demonstrate to the workforce that they prioritise safety alongside other business objectives.

Expectation 1.2 Leadership promotes a culture of continual improvement, speaking up and embedding transparent and open reporting.

Unsatisfactory	Limited	Moderate	Substantial
 Leadership do no not value open and transparent reporting. There is no systematic process for open reporting and ensuring that corrective actions are completed. As such, the Defence organisation does not know if lessons are being learned from incidents and cannot demonstrate continual improvement or a learning culture. 	 Leadership speaks about the importance of open and transparent reporting, but this messaging is not consistent across the Defence organisation. There is some, but not enough evidence of the use of open reporting systems leading to effective corrective action, but this is not consistent. 	 Leadership consistently takes responsibility for developing and promoting an open and transparent reporting culture across the Defence organisation that supports effective safety risk management. There is some evidence of effective use of open reporting systems, with only minor weaknesses in the effectiveness of corrective actions undertaken. 	 Leaders support fairness, openness and learning by making personnel feel confident to speak up when things go wrong, rather than fearing blame. Actions and decisions are understood before they are judged, and people are supported to learn from their actions. People are asked for their advice to help with designing the systems that could help change things for the better. Those responsible for managing incidents draw on human factors (things which influence people's actions and decisions) investigations, skills and expertise to fully understand how an incident happened, the lessons that can be learned and how to adapt in the future.

Expectation 1.3 Leadership sets clear safety responsibilities by which the Defence organisation is measured and held to account.

Unsatisfactory	Limited	Moderate	Substantial
 Some of the Defence organisation workforce do not have defined safety roles and responsibilities. 	Some of the Defence organisation workforce have defined safety roles and responsibilities.	Most of the Defence organisation workforce, but not all, have defined safety roles and responsibilities.	 Everyone in the Defence organisation has defined safety roles and responsibilities. All of the Defence organisation
Performance on safety is not considered during the performance appraisal process.	 Some of the Defence organisation workforce have safety objectives defined in their annual objectives, but this is not done consistently. Performance on safety is considered during the performance appraisal process, but this is not done consistently. 	 Most, but not all, of the Defence organisation workforce have safety objectives defined in their annual objectives, and this is partially applied consistently. Performance on safety is consistently considered during the performance appraisal process. 	 All of the Defence organisation workforce have safety objectives defined in their annual objectives, and this is applied consistently. Driving continual improvement in safety is valued, rewarded, and recognised by leadership.
	but this is not done sometonity.	Leadership takes responsibility for ensuring required safety requirements are met in the Defence organisation's outputs / deliverables.	

Expectation 1.4 Leadership is visible at all levels of the Defence organisation; including through direct interactions with the wider workforce and other stakeholders on matters of safety.

Unsatisfactory	Limited	Moderate	Substantial
 Leadership shows little or no consideration of safety issues or effect on outputs. Throughout the Defence organisation, individuals do not believe that leadership are interested in their safety. There is little or no communication from leadership to stakeholders regarding safety performance and issues. 	 Leadership considers safety risk management, but not in a consistent manner or its effects on outputs. Individuals across the Defence organisation believe that leadership are interested in their safety and are taking the necessary steps to reduce risks. Leadership communicates on safety performance and issues to stakeholders but does not welcome challenge. 	 Leadership shows a clear, wide-ranging understanding of the Defence organisation, including safety management and effects on outputs. Individuals across the Defence organisation express confidence that safety matters are formally discussed by leadership and regularly assessed to reduce risks. Leadership take action to equip stakeholders with sufficient and relevant information to allow them to challenge on safety issues as appropriate. 	 Leadership has continuous engagement with the wider workforce and other stakeholders on safety. Leadership meet and regularly review safety performance at leadership meetings beyond formal safety committee meetings. This is evident to the workforce. Leadership encourages stakeholders to identify areas for improvement, leading to continual improvement in risk management through collaboration and innovation, including providing necessary resources.

Expectation 1.5 Corporate governance holds safety as an equal partner to other strategic objectives such as capability, cost and schedule.

Unsatisfactory	Limited	Moderate	Substantial
 There is little or no evidence of understanding, at any level, of the importance of governance and reviews so that risk management objectives are delivered. There are no governance arrangements in place to demonstrate that the SMS has delivered the intended objectives, and there is no analysis of the findings of monitoring and audits by leadership. 	 There is, but not enough evidence of understanding and support for the role of corporate governance in setting and reviewing safety performance, but it is inconsistent. There are governance arrangements in place, but these do not always align with the organisational risk profile and strategies. Reviews are limited to simple data such as outcomes and status of actions from previous management reviews. 	 There is evidence but could be improved, that reviews result in effective changes to control safety risks. Corporate governance arrangements systematically include lessons learned from events in other Defence organisations and other industries and include measures to assess the outcome of changes made. Corporate governance sometimes holds safety equally to other strategic objectives 	 Corporate governance arrangements encourage suggestions for improvement, and these routinely trigger leadership reviews. Reviews are carried out routinely and result in continual improvement of risk management. Outputs are shared widely to improve processes and encourage positive behaviours. Defence organisations considers safety as equal to other strategic objectives.

Expectation 1.6 A culture is in place which fosters resilient safety management, engages people and promotes effective safety behaviours.

Unsatisfactory	Limited	Moderate	Substantial
 There is little or no evidence to demonstrate that senior leadership are truly interested in safety. Rather, it appears to be viewed as a 'tick box' requirement which hinders rather than enables delivery of Defence organisation priorities. There is little or no evidence that the SMS is seen as important or has been communicated outside of the team of safety specialists. 	 Leadership gathers anecdotal evidence about the wider Defence organisation's culture and behaviour towards safety risk and considers this when designing and implementing policy. There is some, but not enough evidence of effective safety behaviours among the workforce, with limited participation in safety management activities. 	 Safety culture and behaviour surveys are issued and completed on an ad-hoc basis; results are reviewed by the team commissioning and organising the survey(s); and corrective actions are proposed to leadership. There is some but could be improved evidence of effective safety behaviours and engagement in safety management. 	 Safety culture and behaviour surveys are completed and responded to on a regular basis. The outcomes are reviewed by leadership of appropriate seniority. Corrective actions are identified, implemented, and their impact is monitored. There is robust evidence of widespread effective safety behaviours and active engagement in safety management.