

# JSP 816 Volume 1 Defence Environmental Management System Framework

## **Preface**

#### How to use this JSP

- 1. JSP 816 sets out the mandatory requirements for the Defence Environmental Management System (EMS) framework within MOD. The JSP is structured in two parts:
  - a. Volume 1 Directive, which provides the direction that must be followed in accordance with statute or policy mandated by Defence or on Defence by Central Government.
  - b. Volume 2 Guidance, which provides the guidance and good practice that will assist the user to comply with the Directive(s) detailed in Volume 1.
- 2. The Defence EMS framework described in this JSP is the overarching authority for Environmental Management in MOD.

#### Further Advice and Feedback - Contacts

3. The owner of this JSP is the Director LUCC&S. For further information on any aspect of this guide, or questions not answered within the subsequent sections, or to provide feedback on the content, contact:

Job Title/e-mail	Project Focus	Telephone

4. This JSP will be reviewed at least annually. Where this document contains references to policies, publications and other JSPs which are published by other Functions, these Functions have been consulted in the formulation of the policy and guidance detailed in this publication.

## **Contents**

Foreword	i
Preface	ii
How to use this JSP	ii
Further Advice and Feedback – Contacts	ii
Contents	iII
Chapter 1 – Introduction to the Defence Environmental Management System (EMS) Framework	1
Purpose	1
Management System Approach	2
Structure	3
Using the EMS	6
Relationship to the Defence Safety Management System (SMS) Framework (JSP 815 Volume 1)	6
Scope and Authority of this Defence EMS	6
Jurisdiction and legislation	6
Assurance stages	6
Chapter 2 – 12 Elements, Expectations and Performance Statements	7

# Chapter 1 – Introduction to the Defence Environmental Management System (EMS) Framework

#### **Purpose**

- 1. The Defence Environmental Management System (EMS) is **the** system by which all Defence organisations manage the interrelated parts of their business in order to conduct and manage their activities in such a way as to protect the Environment. Each Defence organisation is expected to develop and maintain an EMS which reflects their activities and supports the Defence vision for the Environment. Each organisational EMS should relate back to this overarching document. The scope of the EMS relates solely to Environmental Protection activities.
- 2. This document, JSP 816 Volume 1 provides the Framework that the Defence organisations EMS should meet. Guidance on implementation and principles can be found in JSP 816 Volume 2. The Defence EMS comprises of JSP 816 Volume 1 Framework and JSP 816 Volume 2 Guidance together and JSP 418 (Figure 1).

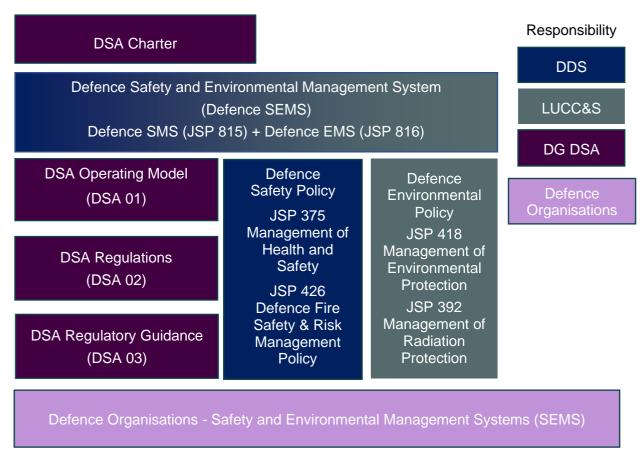


Figure 1: Defence Safety and EP policy and regulation framework

3. Where possible, the Defence EMS Framework seeks to avoid prescribing approaches or requirements, as these may not be generally applicable or relevant for all users but sets goals and provides direction on what good would look like.

#### **Environmental Management System Approach**

- 3. A management system comprises a range of interrelated practices, processes, documents, and information systems used to organise, direct and control Environmental Management within an organisation. These are complemented by attitudes and behaviours towards Environmental Management which must be demonstrated by staff at all levels of an organisation.
- 4. The **Defence** EMS Framework provides direction on the components needed for a cohesive and appropriate Environmental Management System. The framework encompasses the Environmental Management elements required to operate in an effective and consistent manner throughout the Department.
- 5. The Defence EMS Framework is based on the four-stage 'Plan-Do-Check-Act' approach (Figure 2) which helps to deliver and continually improve the Department's performance relating to the Environment:

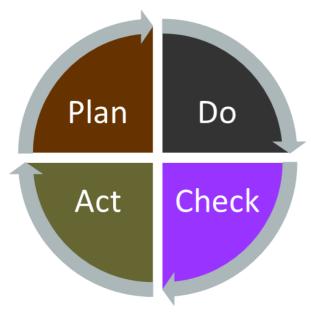


Figure 2: Plan-Do-Check-Act Cycle

- 6. The D-LUCC&S will oversee the process of implementing the Defence EMS.
- 7. The Defence EMS Framework:
  - a. is non-prescriptive and based on a devolved accountability model of Environmental Management, allowing each Defence organisation to manage environmental impacts consistent with Defence requirements, through their own specific Organisational governance and operational context.
  - b. outlines responsibilities and obligations each Defence organisation must take into account when managing environmental risks and impacts. It includes a set of expectations and performance statements that all Defence organisations must conform to when establishing governance frameworks, developing Environmental Management strategies, processes and performance indicators to regularly monitor and improve their Environmental Management. It also outlines the leadership and culture that must be in place to support process implementation. It also sets out the need to establish systems to identify and address performance failures.

c. is aligned to ISO 14001:2015, the international standard for Environmental Management systems, but tailored to meet the specific needs of Defence.

JSP 816 Volume 1 is a goal-based approach to managing environmental impacts in Defence and supports Defence's environmental ambition. As such, it gives each Defence organisation the flexibility to develop their own tailored EMS and pathways to meeting that ambition.

#### Structure

8. The Defence EMS Framework is divided into 12 **elements** to cover Defence organisation activities. Together, the elements provide those conducting their own EMS with a holistic approach to consider how they will control, manage, and respond to relevant Environmental risks and impacts. The 12 **elements** which form the Defence EMS Framework are shown in Figure 3.



Figure 3: Defence EMS Framework 12 Elements

- 9. Each element is supported by a series of **expectations** which describe the activities expected to be in place within each Defence organisation's Environmental Management systems. They outline typical processes, governance arrangements and other behaviours which are indicators of successful management systems.
- 10. Each expectation is further articulated by **performance statements** which set out how compliance

and continual improvement is demonstrated. Examples are given of performance across a maturity continuum, from those that would lead to no assurance, through limited, substantial, to full assurance. The 12 elements and their supporting expectations are shown in Figure 4.

E1 Leadership, Governance and Culture	E1.1 Tone from the top E1.2 Continual improvement E1.3 Accountabilities and responsibilities E1.4 Leadership visibility E1.5 Strategic objectives E1.6 Culture and behavior	Element 1
E2 Organisation and Dependencies	E2.1 Environmental Management System E2.2 Roles, responsibilities, and accountabilities E2.3 Allocation of resources E2.4 Sharing information E2.5 Standards of Environmental Management E2.6 Consultation with external and internal regulators E2.7 Changes to structure and personnel E2.8 Dependencies and interfaces	Element 2
E3 Legislation, Policy, Regulations and Guidance	E3.1 Compliance obligations E3.2 Compliance with policy and regulations E3.3 Local policy and guidance E3.4 Communicating compliance requirements E3.5 Review of policies and guidance E3.6 Exemptions, disapplication's, derogations	Element 3
E4 Environmental Aspect Identification, Risk and Impact assessment, Mitigation, and Opportunities	E4.1 Environmetnal Aspects E4.2 Managing risks and impacts E4.3 Escalation of risk and impacts E4.4 Communicating aspects, risks, impacts and controls E4.5 Continual improvement E4.6 Changes affecting the Defence organisation E4.7 Environmental case through acquisition lifecycle E4.8 Environmental opportunities	Element 4
E5 Supervision, Contracting and Control Activities	E5.1 Delegation of authority E5.2 Competence of delegated authority E5.3 Risk and impact elevation E5.4 Documentation of delegation E5.5 Mitigation of risks using BPEO E5.6 Ceasing activities E5.7 Environmental protections	Element 5
E6 Personnel Competence, Resources and Training	E6.1 Resources E6.2 Responsibilities, accountabilities, and delegation E6.3 People development E6.4 Training programmes E6.5 Competency assessment	Element 6
E7 Equipment Design, Manufacture and Maintenance	E7.1 Equipment lifecycle risks and impacts  E7.2 Risk and impact mitigation  E7.3 Compliance with statute and Defence Regulation  E7.4 Equipment maintenance and operation  E7.5 Physical Equipment changes  E7.6 Supply chain risks and dependencies  E7.7 Lessons learned  E7.8 Equipment and systems integration risk	Element 7

E8 Infrastructure Design, Build and Maintenance	E8.1 Infrastructure lifecycle risks and impacts E8.2 Risk and impact mitigation E8.3 Compliance with statute and Defence regulation E8.4 Infrastructure maintenance and operation E8.5 Physical infrastructure changes E8.6 Supply chain risks and dependencies E8.7 Lessons learned	Element 8
E9 Performance, Management Information and Reporting	E9.1 Monitoring performance E9.2 Reviewing performance E9.3 Management information review E9.4 Leadership performance decisions E9.5 Document storage and disposal	Element 9
E10 Incident Management and Continual Improvement	E10.1 Incident reporting E10.2 Incident recording E10.3 Incident investigation E10.4 Implementation of actions and learning E10.5 Emergency and business continuity plans tested	Element 10
E11 Communications and Stakeholder Engagement	E11.1 Stakeholder identification E11.2 Stakeholder engagement E11.3 Stakeholder collaboration E11.4 Accessing information E11.5 Feedback and raising concerns anonymously	Element 11
E12 Assurance	E12.1 1st Line of Defence (LOD) assurance E12.2 2LOD and 3LOD assurance E12.3 Annual self-assessment E12.4 Leadership review of EMS E12.5 Corrective action	Element 12

Figure 4: Defence EMS Framework 12 Elements and supporting Expectations

#### **Using the EMS**

- 11. It is the responsibility of each Defence organisation to develop and implement an EMS that meets the 12 elements, and accompanying expectations, for their organisation.
- 12. Defence organisations should adopt an evidence-based approach to their own EMS. Several data sources, information and knowledge are likely to be used to measure an organisation's current Environmental performance.
- 13. The documentation listed within each element, provide Defence organisations and assessors with an initial starting point to assess an EMS; the evidence to support performance assessment against each expectation and to determine overall performance against each element.

# Relationship to the Defence Safety Management System (SMS) Framework (JSP 815 Volume 1) and other JSPs

- 14. It is recognised that within Defence, Safety and Environmental Management are often, but not exclusively managed through the same organisational structures, governance arrangements, and documentation. The twinned development of JP816 and JSP815 aims to support this method whilst allowing sufficient flexibility to deliver the safety and environmental outcomes that Defence requires.
- 15. JSP 815 Volume 1 contains the Defence Safety Management System framework. It contains the same 12 element titles supported by expectations and performance statements aligned to the EMS but with the content amended to reflect health and safety management and policy requirements. In so far as is practical, both JSP 815 Volume 1 and JSP 816 Volume 1 will look to be 'digital twins', aligned in their format and presentation.
- 16. JSP 816 Volume 1 should be read in conjunction with other MOD internal policy documents such as but not limited to JSP 375, JSP 418, JSP 426, JSP 392 and JSP 850.

## Scope and authority<sup>3</sup> of this Defence EMS

17. The document takes its authority from the Secretary of State's (SofS) Policy Statement for Health, Safety and Environmental Protection (HS&EP) in Defence. All Defence organisations should be aware of the Defence EMS requirements and demonstrate their compliance with it.

### Jurisdiction and legislation

18. Any reference within the EMS to compliance with legislation generally refers to UK law. Where Organisations conduct overseas activity or have an overseas presence, compliance with legislation requires them to consider the latest Defence policy, guidance on applying UK standards and the host nation's relevant Environmental expectations, particularly where these are not aligned.

## **Assurance stages**

19. Performance statements are provided on a maturity continuum aligned with the MOD's assurance stages. These stages are sequential and build on all previous stages, i.e., an Organisation can only

achieve "substantial assurance" once the expectations and requirements of "limited assurance" have been achieved, in addition to the new performance statements contained in substantial assurance.

20. Figure 4 sets out some of the typical characteristics of processes and controls for each level.

#### **Full Assurance**

# System of internal control established and operating effectively.

For example, processes deliver the characteristics of Substantial, with an added focus on continual improvement and control performance. A blend of incremental improvements and innovative technological changes are identified through proactive engagement with industry and sector good practice.

# System of internal control established and operating effectively with some minor weaknesses.

# Substantial Assurance

For example, processes are repeatable and consistently applied, with management able to articulate and report on current activities through consistent process metrics and indicators. Management can adjust and adapt processes to suit particular projects, maintaining quality and delivery. Repeatable outputs to be delivered to the desired level.

#### Limited Assurance

# System of internal control established and operating effectively except for some areas where significant weaknesses have been identified.

For example, processes are typically repeatable with a degree of consistency. Process has some structure, however there is unlikely to be a review of the quality and consistency of control activity. There is limited documentation and evidence of control operation and outputs are not delivered to the desired level.

#### System of internal control poorly developed or nonexistent or major levels of non-compliance identified.

#### No Assurance

For example, processes are typically undocumented and operate inconsistently. They may have been introduced through ad-hoc and reactive arrangements, rather than being designed to incorporate controls to manage known risks. This leads to undesired outputs and an inconsistent control environment between areas of the Defence Organisation, teams and individuals.

Figure 4: Assurance Stages

## Chapter 2 – 12 Elements, Expectations and Performance Statements

Chapter 2 of this JSP contains the 12 Elements, Expectations and corresponding Performance Statements as shown on the following pages.

## **Element 1: Leadership, Governance and Culture**

#### **Purpose**

This Element focuses on the extent to which a Defence organisation has a vision, clear aims and objective about what it can and wants to achieve in terms of the Environment. Together with effective leadership, governance methods promote an effective approach to Environmental Management at all levels of the organisation 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.

#### The expectations in this element are:

- **E1.1** Leadership sets the "tone from the top" and actively demonstrate their commitment to Environmental Management.
- **E1.2** Leadership promotes a culture of continual improvement, championing the Environment, and embedding transparent and open reporting.
- **E1.3** Leadership sets clear Environmental management responsibilities through which the 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 Environmental Management.
- **E1.5** Corporate governance ensures that the Environmental aims and objectives of the organisations are compatible with Defence strategic direction.
- **E1.6** A culture is in place that encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognises them for it.

#### Documents often associated with this element:

- Agenda and minutes of the relevant committee meetings (Strategic, Tactical, and Working)
- Annual Budget Cycle (ABC) planning (for inclusion of Health, Safety and Environment 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 EMS
- Delegations / letters of appointment and formal acceptance
- Establishment Management Plans
- Health and Safety and Environmental Protection (HS&EP) Organisation and Arrangement (O&A) statement
- 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)

**Expectation 1.1** Leadership sets the "tone from the top" and actively demonstrate their commitment to Environmental Management.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>There is no evidence of effective leadership relating to Environmental Management.</li> <li>Employees are not aware of the Defence organisation's environmental goals.</li> </ul>	<ul> <li>There is limited evidence of leadership messaging relating to Environmental Management that inspires others within the Defence organisation.</li> <li>There is limited evidence to show that employees understand how they contribute to achieving the Defence organisation's environmental goals and act accordingly.</li> </ul>	<ul> <li>There is evidence of leadership behaviours that inspire others within the Defence organisation to work to deliver against the Environmental Management vision of the organisation (e.g., actively referencing and addressing environmental issues in meetings and communication).</li> <li>There is evidence to show that employees know how they contribute to achieving the organisation's environmental goals but with minor weaknesses in understanding the organisation's relevant policies and vision of the senior team and acting accordingly.</li> </ul>	<ul> <li>Leadership have set a vision and a clear tone from the top on Environmental Management.</li> <li>Leadership is visible in the workplace and demonstrate their commitment to Environmental Management not just through words but via their individual actions and behaviours that clearly demonstrate to the workforce that they prioritise the environment alongside other business objectives. Examples include specifically prioritising the discussion of environmental issues and ensuring these are given due priority when balancing against other operational activities.</li> </ul>

**Expectation 1.2** Leadership promotes a culture of continual improvement, championing the Environment, and embedding transparent and open reporting.

#### No Assurance

- Leadership do not take action to support 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 environmental impact incidents and cannot demonstrate continual improvement or a learning culture.

#### **Limited Assurance**

- Leadership speaks about the importance of open and transparent reporting, but this messaging is not consistent across the Defence organisation.
- There is limited evidence of the use of open reporting systems leading to effective corrective action, and this is not consistent.

#### **Substantial Assurance**

- Leadership consistently takes responsibility for developing and promoting an open and transparent reporting culture across the Defence organisation that supports effective Environmental management.
- There is evidence of effective use of open reporting systems (e.g., incident reports, near miss reports, continual improvement suggestions in meetings), with only minor weaknesses in the effectiveness of corrective actions undertaken.

#### Full Assurance

- Leaders support 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.

**Expectation 1.3** Leadership sets clear Environmental management responsibilities through which the organisation is measured and held to account.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
Most, if not all, of the Defence organisation workforce do not have defined Environmental Management roles and/or responsibilities.	<ul> <li>Some of the Defence organisation workforce have defined Environmental Management roles and/or responsibilities.</li> </ul>	<ul> <li>Most of the Defence organisation workforce, but not all, have defined Environmental Management roles and/or responsibilities.</li> </ul>	<ul> <li>Everyone in the Defence organisation has defined Environmental Management roles and/or responsibilities.</li> <li>Where roles require all of the</li> </ul>
Performance on Environmental Management is not considered during the performance appraisal process.	<ul> <li>Where roles require some of the Defence organisation workforce have Environmental Management objectives defined in their annual objectives, but this is not done consistently.</li> </ul>	<ul> <li>Where roles require most, but not all, of the Defence organisation workforce have Environmental Management objectives defined in their annual objectives, and this is largely consistent.</li> </ul>	Defence organisation workforce have Environmental Management objectives defined in their annual objectives, and this is applied consistently.  • Driving continual improvement in Environmental Management is
	<ul> <li>Performance on Environmental Management is considered during the performance appraisal process, but this is not done consistently.</li> </ul>	<ul> <li>Performance on environmental management is consistently considered during the performance appraisal process.</li> </ul>	valued, rewarded, and recognised by leadership.

**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 Environmental Management.

No Assurance	Limited Assurance	<b>Substantial Assurance</b>	Full Assurance
<ul> <li>Leadership shows little or no consideration of environmental issues or externalities.</li> <li>Throughout the Defence organisation, individuals do not believe that leadership are interested in mitigating environmental impacts.</li> <li>There is no communication from leadership to stakeholders regarding environmental performance and issues.</li> </ul>	<ul> <li>Leadership considers         Environmental management, but         not in a consistent manner nor         its effects on outputs.</li> <li>Individuals across the Defence         organisation believe that         leadership is interested in         reducing environmental impacts         and are taking proper mitigative         action.</li> <li>Leadership communicates on         adhoc basis on Environmental         Management performance and         issues to stakeholders.</li> </ul>	<ul> <li>Leadership demonstrates and articulates a clear, wide- ranging understanding of Environmental impacts and risks.</li> <li>Environmental Management matters are formally discussed by leadership and regularly assessed to reduce risks and impacts.</li> <li>Leadership takes action to equip stakeholders with sufficient and relevant information to allow them to challenge on Environmental Management issues as appropriate.</li> </ul>	<ul> <li>Leadership has continual engagement with the wider workforce and other stakeholders on Environmental Management.</li> <li>Leadership meets and regularly reviews Environmental performance at leadership meetings beyond formal environmental committee meetings. This is evident to the workforce.</li> <li>Leadership encourages stakeholders to identify areas for improvement, leading to continual improvement in Environmental Management through collaboration and innovation, including providing necessary resources.</li> </ul>

**Expectation 1.5** Corporate governance ensures that the Environmental aims and objectives of the organisation are compatible with Defence strategic direction.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>There is no evidence the corporate governance at the Environmental aims objectives of the organi with Defence strategic direction.</li> </ul>	ligns understanding and support for and the role of corporate governance	<ul> <li>There is evidence that management reviews result in effective changes to Environmental risk and impact mitigation.</li> <li>Corporate governance</li> </ul>	<ul> <li>Corporate governance for Environmental Management arrangements are regularly improved and reviewed by leadership</li> <li>Reviews are carried out routinely</li> </ul>
There are no governand arrangements in place to demonstrate that the EN delivered its intended objectives, and there is assessment conducted leadership of monitoring audits.	o arrangements in place but these MS has do not always align with the organisational risk profile and no strategies. Reviews are limited to by simple data such as outcomes	arrangements for Environmental Management systematically include lessons learned from events in other Defence	and result in continual improvement of Environmental Management. Outputs are shared widely to improve the corporate governance profile of the Defence organisation.  Defence organisations consider Environmental Management as equal to other strategic objectives.

**Expectation 1.6** A culture is in place that encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognises them for it.

#### No Assurance

- There is no evidence to demonstrate that senior leadership are truly interested in Environmental Management.
   Rather, it appears to be viewed as a 'tick box' requirement which hinders rather than enables delivery of Defence organisation priorities.
- There is no evidence that the EMS is seen as important or has been communicated outside of the team of Environmental Management experts.

#### **Limited Assurance**

- Leadership gathers anecdotal evidence about the wider Defence organisation's culture and behaviour towards Environmental Management and considers this when designing and implementing policy.
- There is limited evidence of effective environmental behaviours among the workforce, with limited participation in Environmental Management activities.

#### **Substantial Assurance**

- Environmental culture and behaviours are included in culture surveys.
- Results are reviewed by the team commissioning and organising the survey(s) and corrective actions are proposed to leadership and considered for implementation.
- There is good evidence of effective environmental impact behaviours and engagement in Environmental Management.

#### **Full Assurance**

- Bespoke Environmental
   Management 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 consistently
   identified, implemented, and their
   impact is monitored.
- The organisation rewards those who demonstrate positive environmental behaviours
- There is clear evidence of widespread effective environmental behaviours and active engagement in Environmental Management.

## **Element 2: Organisation and Dependencies**

#### **Purpose**

This element ensures that the Defence organisation's structure facilitates and encourages flexibility, collaborative working, informative sharing, and resilience towards the delivery of effective Environmental Management. This includes:

- Intra-organisation working between Defence organisations, with teams that are formed to best meet delivery requirements and mitigate Environmental risks and impacts rather than aligned with organisational and geographical boundaries; and
- Inter-organisation working, such as with other government departments, Environmental Regulators and NGOs, which brings in experience and expertise from external parties; and
- Identifying and understanding organisational autonomy and dependencies in the delivery of Departmental Environmental aims and objectives.

#### The Expectations in this element are:

- **E2.1** Defence Organisations develop and maintain an EMS system specific to their area of responsibility. It sets out how the Defence EMS and underpinning policy and regulations will be delivered in a way specific to the Defence Organisation.
- **E2.2** The organisation defines its Environmental Management roles, responsibilities and accountabilities in its EMS.
- **E2.3** There is a system in place to determine and allocate to appropriate resources (i.e. budget and people).
- **E2.4** The Defence Organisation has arrangements in place to share information about Environmental risks and impacts, supporting effective risk management and continual improvement.
- **E2.5** The organisation checks that standards of Environmental management, including policies and procedures, of its contractors and suppliers are working to an equal, or better standard than Defence standards.
- **E2.6** The organisation has mechanisms for joint working with external and internal Environmental Regulators.
- **E2.7** Changes to an organisational structure or changes in personnel with specific knowledge or experience are evaluated, risk assessed, approved and documented.
- **E2.8** Mechanisms are in place to identify functional and organisational dependencies and interfaces and how Environmental risks, impacts and opportunities are managed between these.

#### Documents often associated with this element

- Annual Budget Cycle (ABC) planning
- Agenda and minutes of the HS&EP committee meetings (Strategic, Tactical and Working)
- Command / Corporate plan
- Contract management and supply chain management plans
- Communication plans
- Defence Organisation Operating Model
- Defence Organisation EMS
- Joint Basing Arrangements (JBAs)
- Management of change process (for H&S inclusion)
- Memorandums of Understanding (MOUs)
- Organisation and Arrangements
- Organisational Safety Assessments (OSAs)
- Sustainability and Environmental Assessments (SEATs)
- RACI (Responsible, Accountable, Consulted, Informed) matrix
- Risk management process
- Service Level Agreements (SLAs)
- Suitably Qualified Experienced Person (SQEP) gaps

**Expectation 2.1** Defence organisations develop and maintain an Environmental Management System (EMS) specific to their area of responsibility. It sets out how the Defence EMS and underpinning policy and Defence regulations will be delivered in a way specific to the Defence organisation.

#### No Assurance

#### Defence organisations do not maintain an EMS which is specific to their area of responsibility.

#### **Limited Assurance**

 Defence organisations maintain an EMS which is specific to their area of responsibility. However, this is reviewed on an ad-hoc basis only and does not clearly set out how the EMS, underpinning policy and regulations will be delivered

#### **Substantial Assurance**

 Defence organisations maintain an EMS which is specific to their area of responsibility. This is reviewed on at least an annual basis and clearly sets out how the EMS and underpinning policy, regulations will be delivered. This is communicated to all stakeholders across the organisation.

#### **Full Assurance**

Defence organisations maintain an EMS which is specific to their area of responsibility. This is reviewed on at least an annual basis and clearly demonstrates how the organisation is kept aware of good practice within underpinning policy and regulations so that continual improvement can be maintained. All stakeholders in the organisation can explain their role or how they might be involved in the EMS.

**Expectation 2.2** The organisation defines its Environmental Management roles, responsibilities, and accountabilities in its EMS.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
Environmental Management roles, responsibilities and accountabilities are not clearly defined or communicated in an established EMS.	<ul> <li>There is limited understanding of Environmental Management roles and responsibilities across the Defence organisation.</li> <li>These roles are defined and documented in the EMS (e.g., for senior management) but are not well understood by or communicated to those responsible.</li> <li>Roles and responsibilities are not reviewed and updated following any lessons learned or changes to Defence organisation's resources and activities.</li> </ul>	<ul> <li>There is a clear understanding of Environmental Management roles and responsibilities across the Defence organisation.</li> <li>These roles are clearly defined and documented in the EMS for all relevant levels of the workforce.</li> <li>Roles and responsibilities are reviewed and updated following any lessons learned or changes to Defence organisation's resources and activities.</li> </ul>	<ul> <li>There is comprehensive understanding of Environmental Management roles and responsibilities across the Defence organisation</li> <li>These roles are clearly defined and documented in the EMS at all levels of the workforce and supported by robust evidence that the workforce understand the importance of their responsibilities and accountability for reducing environmental risks.</li> <li>Roles and responsibilities are consistent in practice with those set out in policy documents and systematically reviewed and updated each year as a minimum.</li> </ul>

**Expectation 2.3** The Defence organisation has a system in place to allocate appropriate resources (i.e., budget and people).

#### No Assurance

- There is no, or very little evidence that leadership considers Environmental management in the allocation of budgets and resources.
- The system of budget and resource allocation towards addressing Environmental management is not defined or applied, impacting the Defence organisation's ability to address Environmental risks.

#### **Limited Assurance**

- Some evidence that leadership applies a system to consider Environmental management during budget and resource reviews.
- The extent of budget and resource allocation to address Environmental management is not based on a clear riskbased rationale.

#### **Substantial Assurance**

- Clear evidence that leadership formally and systematically discusses Environmental Management during budget and resource reviews.
- The extent of budget and resource allocation to address Environmental management is based on risk level and regularly reviewed to reflect the Defence organisation's activity.

#### **Full Assurance**

- Leadership demonstrates an understanding that Environmental Management is an integral part of a productive Defence organisation.
- The Defence organisation's Environmental risk profile is directly linked to resource and budget allocation to manage these risks. Regular reviews are discussed at senior governance forums to inform decision making and continual improvement.

**Expectation 2.4** The Defence organisation has arrangements in place to share information about Environmental risks and impacts, supporting effective risk management and continual improvement.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>People work in isolation with no arrangement for environmental information sharing.</li> <li>Environmental risk management is not governed by a clear framework for sharing information.</li> </ul>	<ul> <li>Environmental information is shared within the Organisation, on an ad hoc basis without clearly documented dependencies and defined information requirements.</li> <li>Environmental risk management processes are applied without a consistent cross-Organisation framework</li> </ul>	<ul> <li>Environmental information is proactively shared across interorganisational boundaries. There is a culture of open and honest communication between teams and with the stakeholders.</li> <li>Environmental risk management and continual improvement is implemented, using a cross-Organisation framework.</li> </ul>	<ul> <li>There is clear evidence to show that the Defence organisation understands the importance of sharing information interorganisation and intraorganisation to continually improve environmental risk management.</li> <li>Environmental risk management and continual improvement is consistently implemented, using a cross-Organisation framework including from other organisations and industries in the UK and internationally.</li> </ul>

**Expectation 2.5** The Defence organisation checks that the standards of Environmental Management of its contractors and suppliers meet or exceed Defence standards.

#### No Assurance Limited Assurance Substantial Assurance **Full Assurance** There are no formal processes • There is limited monitoring of the • Evidence of effective Clear evidence that effective or systems to identify the **Environmental Management** arrangements for the selection of processes exist for **Environmental Management** activities of contractors, and contractors, and suppliers. environmental performance activities of contractors, and suppliers. considering Environmental pre-qualification, selection. induction, management and suppliers. performance of the contractor or Management does not have supplier. post-contract review of There is no monitoring of their consistent data to assess the contractors and suppliers. performance against the **Environmental Management** Effective processes exist for the Defence organisation's own status of contracts, particularly ongoing environmental These processes are regularly policies and practices. for long- running contracts. reviewed and there is evidence performance management of of effective interventions being contractors at all stages of the Contractor and supplier There is limited evidence of relationship. made as required. contracts do not specify environmental risk checks with Environmental harm reduction There is evidence that the contractors, and suppliers. • There are performance Defence organisation policies or environmental measures and post-contract reporting requirements. reviews in place to help guide proactively promotes decisions on the choice of **Environmental Management in** the whole supply chain. contractor.

**Expectation 2.6** The organisation has mechanisms for joint working with external and internal Environmental Regulators.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Organisation does not engage in joint working with internal or external Environmental Regulators.	There is evidence of engagement with external and internal Environmental regulators, but with little positive impact in relation to Environmental Management.	The Organisation collaborates with external and internal Environmental regulators. There is evidence of effective two-way communication on certain specific environmental matters.	The Organisation collaborates extensively with external and internal Environmental regulators. There is evidence of transparent and effective two-way communication across the full breadth of environmental matters.

**Expectation 2.7** Changes to an organisational structure or changes to personnel with specific knowledge or experience are evaluated, risk assessed, approved, and documented.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Environmental implications of changes to the organisational structure or changes to personnel with specific knowledge are not evaluated, risk assessed, approved, and documented.	Processes for evaluating and risk assessing the Environmental Management implications of changes to the organisational structure or changes to personnel with specific knowledge are defined but are not effectively or consistently implemented.	The Environmental     Management implications of     changes to the organisational     structure or changes to     personnel with specific     knowledge are evaluated,     risk assessed, approved, and     documented, with some gaps     evident.	The Environmental     Management implications of     changes to the organisational     structure or changes to     personnel with specific     knowledge are evaluated,     risk assessed, approved,     documented, and reviewed     periodically following     implementation.

**Expectation 2.8** Mechanisms are in place to identify functional and organisational dependencies and interfaces, and how Environmental risks, impacts and opportunities are managed between these.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>There is no coordination to manage environmental risks and impacts.</li> <li>There is no liaison with other organisations over Environmental Management procedures and standards.</li> <li>Environmental opportunities are not taken into account or evaluated by leadership.</li> </ul>	<ul> <li>There is coordination of Environmental Management risks and impacts at the working level but there no overall organisational oversight of dependencies and interfaces.</li> <li>There is infrequent liaison with other organisations over Environmental Management procedures and standards implemented. This does not include all stakeholders.</li> <li>Environmental opportunities are rarely taken into account or evaluated.</li> </ul>	<ul> <li>There is widespread coordination of Environmental Management issues with some arrangements to manage dependencies and interfaces.</li> <li>There is use of extra organisational knowledge and collaboration leading to clear understanding and control of shared and common Environmental risks.</li> <li>Environmental opportunities are often taken into account and evaluated across the Defence organisation.</li> </ul>	<ul> <li>Dependencies and interfaces are managed so that Environmental management practices are drawn from, implemented, and shared with other organisations.</li> <li>The Defence organisation looks to other industries to identify good Environmental management practices and there is evidence that this has led to continual improvement.</li> <li>Environmental opportunities are always taken into account and evaluated by leadership throughout the entire Defence organisation and shared across all stakeholders.</li> </ul>

## Element 3: Legislation, Policy, Regulations and Guidance

#### **Purpose**

This element ensures that the organisation identifies and communicates the requirements of applicable Environmental legislation, policy, regulations, and guidance and determines how these impact the organisation. Leadership sets out how Environmental Management contributes to the organisation's success and achievement of objectives and puts in place a framework for making balanced decisions at all levels both within the organisation and across other Defence organisations.

#### The Expectations in this element are:

- **E3.1** The Defence Organisation has mechanisms in place to identify and maintain its Environmental compliance obligations.
- **E3.2** The Defence organisation has mechanisms in place to comply with all relevant Defence Environmental Management expectations.
- **E3.3** The Defence Organisation's policy and guidance is consistent with Defence EMS and avoids duplication.
- **E3.4** The Defence Organisation has mechanisms in place to communicate with internal and external stakeholders the requirements to comply with Environmental legislation, Defence policy and guidance and Defence regulations.
- **E3.5** Policies and guidance are reviewed regularly to reflect any significant changes.
- **E3.6** The Defence organisation has a process in place to manage exemptions from statute, and exemptions / waivers / concessions from Defence regulation.

#### Documents often associated with this element:

- Agenda and minutes of the HS&EP committee meetings (Strategic, Tactical and Working)
- Command / Corporate plan
- Communications Plan (for Environmental information cascade)
- Compliance Registers
- Defence Codes of Practice (DCOPs)
- Defence Organisation business plans
- Defence Organisation Operating Model
- Defence Organisation EMS
- Exemptions log and process
- Environmental Case
- · Leadership sign-off for policy
- Legislation reviews and implementation process
- Legislation risk register
- Management Plans
- Policy changes process
- Policy tracker
- Risk registers review process
- Role holder for horizon scanning and policy update

**Expectation 3.1** The Defence organisation has mechanisms in place to identify and maintain its Environmental compliance obligations.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>Existing environmental legislation and regulations are identified and recorded with significant gaps present.</li> </ul>	<ul> <li>Existing environmental legislation and regulations are identified and recorded with some gaps.</li> </ul>	<ul> <li>Existing environmental legislation and regulations are identified and recorded with minor gaps.</li> </ul>	<ul> <li>Existing environmental legislation and regulations are systematically identified and recorded.</li> </ul>
<ul> <li>New and amended Environmental legislation and compliance is only taken into account on a reactive basis once it has become a legal requirement.</li> </ul>	<ul> <li>Upcoming changes to Environmental legislation and regulations are anticipated. However, there is limited activity to assess their impact on the Defence organisation.</li> </ul>	<ul> <li>The Defence organisation systematically identifies and anticipates new Environmental legislation and looks ahead to anticipate the potential impact on activities and standard operating procedures.</li> </ul>	<ul> <li>The Defence organisation is aware of and engages with the consultation phases of emerging Environmental legislation to represent the requirements of its workforce, contractors, internal regulators, and supply chain.</li> </ul>
		<ul> <li>Workforce, contractors, internal regulators, and suppliers likely to be affected by the legislation changes are identified and consulted.</li> </ul>	<ul> <li>It considers the potential impact that new legislation may have on its capabilities, both in the UK and overseas.</li> </ul>

**Expectation 3.2** The Defence organisation has mechanisms in place to comply with all relevant Defence Environmental Management expectations.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>The Defence organisation cannot effectively demonstrate compliance with Defence Environmental policy and regulations.</li> </ul>	<ul> <li>The Defence organisation can only demonstrate compliance with Defence Environmental policy and regulations in limited and isolated areas.</li> </ul>	<ul> <li>The Defence organisation can demonstrate compliance with most Defence Environmental policy and regulations with some gaps.</li> </ul>	<ul> <li>The Defence organisation can demonstrate compliance with all Defence Environmental policy and regulations.</li> <li>If non-compliance is identified</li> </ul>
<ul> <li>No action is taken to address non- compliance when identified.</li> </ul>	<ul> <li>Where non-compliance is identified, action is rarely taken to address this, and often at a slow pace.</li> </ul>	Where non-compliance is identified, timely action is often taken to address this.	action is taken to immediately address this. The Defence organisation can demonstrate learnings from any noncompliance.

**Expectation 3.3** The Defence organisation's policy and guidance is consistent with the Defence EMS and avoids duplication.

No Assurance	Limited Assurance	<b>Substantial Assurance</b>	Full Assurance
The Defence organisations     Environmental policy and     guidance does not align with     the Defence EMS, or     duplicates existing policy and     guidance, risking confusion of     responsibilities and     requirements.	<ul> <li>The Defence organisation's         Environmental policy and         guidance although established         is operating with major         weaknesses identified.</li> <li>There are significant areas         where the Defence organisations         policy and guidance is</li> </ul>	<ul> <li>The Defence organisation's         Environmental policy and         guidance is established and         operating with minor         weaknesses identified.</li> <li>Guidance is consistent with the         Defence EMS with only minor         unnecessary duplication of</li> </ul>	<ul> <li>The Defence organisation's Environmental policy and guidance is established and operating effectively.</li> <li>There is no unnecessary duplication, inconsistency or overlap with the Defence EMS.</li> </ul>
<ul> <li>Defence organisation's         Environmental policy and guidance is poorly developed, or non- existent     </li> </ul>	inconsistent with the Defence EMS.	content.	

**Expectation 3.4** The Defence organisation has mechanisms in place to communicate with internal and external stakeholders the requirement to comply with Environmental legislation, Defence policy and guidance and Defence regulations.

#### No Assurance Limited Assurance **Substantial Assurance Full Assurance** Environmental legislation. Environmental legislation. Environmental legislation. Environmental legislation. Defence policy and regulations Defence policy and regulations Defence policy and regulations Defence policy and regulations and the Defence organisation's and the Defence organisation's and the Defence organisation's and the Defence organisation's policy and guidance are not well policy and guidance is policy and guidance is policy and guidance is well understood bevond communicated within the communicated and broadly communicated and fully understood within the organisational Environmental organisation but is inconsistently understood within the specialists. organisation with minor gaps organisation. understood. present. Stakeholders are not aware of Stakeholders are aware of Stakeholders are aware of applicable Environmental applicable Environmental Stakeholders are aware of applicable Environmental legislation, Defence policy and applicable Environmental legislation, Defence policy and legislation. Defence policy and regulations and have a full regulations. regulations but do not legislation, Defence policy and understand how these apply to regulations and have a basic understanding how these apply understanding how these apply to their organisation. their organisation. to their organisation. Amendments and updates are communicated on a timely basis, with leadership providing clear direction on how the organisation should prepare for new requirements.

**Expectation 3.5** Policies and guidance are reviewed regularly to reflect any significant changes.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>Environmental policies and guidance are out of date,</li> <li>There are no mechanisms to review Environmental policies and guidance</li> </ul>	<ul> <li>Some environmental policies and guidance are up to date</li> <li>Mechanisms exist to review Environmental policies and guidance. This is applied inconsistently to address external Environmental changes</li> </ul>	<ul> <li>The majority of environmental policies and guidance are up to date with some gaps</li> <li>Mechanisms exist to review environmental policies. This is applied on a consistent basis where required by external environmental changes</li> </ul>	<ul> <li>All Environmental policies are kept up-to-date and systematically reviewed with stakeholder involvement to drive continual improvement in Environmental Management performance.</li> <li>Leadership recognises the importance of reviewing the policies and guidance proactively and at least annually, consulting stakeholders across the Defence organisation.</li> </ul>

**Expectation 3.6** The Defence organisation has a process in place to manage DEDs from statute, and exemptions / waivers / concessions from Defence regulation.

#### Full Assurance **Limited Assurance Substantial Assurance** No Assurance • The Defence organisation does • The Defence organisation has a • The Defence organisation has a • The Defence organisation has methodical and documented a methodical and documented not have a process for applying process for applying for, and for, or managing, DEDs from managing. DEDs from statute or process, which is consistently process that is operating statute, or exemptions / exemptions / waivers / applied, for applying for, and effectively for applying for, and managing. DEDs from statute waivers / concessions from concessions from Defence managing. DEDs from statute Defence regulations. regulations but weaknesses are or exemptions / waivers / or exemptions / waivers / concessions from Defence apparent in its design or concessions from Defence regulations. There are minor regulations. The list of application. gaps in the application of the exemptions / waivers / concessions, and any process. additional measures required to maintain them, is kept under regular review.

# Element 4: Environmental Aspect Identification, Risk and impact assessment, mitigation, and opportunities

#### **Purpose**

This element ensures that the organisation has put in place effective methods for identifying Environmental aspects, their impacts, their risks, and opportunities as a basis of effective Environmental Management.

#### The Expectations in this element are:

- **E4.1** The Defence Organisation has mechanisms in place to assess its risk profile and identify its Environmental aspects
- **E4.2** The Defence Organisation has mechanisms in place to manage its environmental risks and impacts, including provision of proportionate controls.
- **E4.3** Where Environmental risks and impacts are significant these risks are elevated and Leadership are actively involved in their management.
- **E4.4** The Defence Organisation has arrangements in place to ensure communication of Environmental aspects, risks, impacts and opportunities to all stakeholders, outlining control measures needed to deliver effective Environmental Management.
- **E4.5** The Defence Organisation has mechanisms in place to continually improve risk management with the aim of protecting the environment from harm.
- **E4.6** The Defence Organisation tracks changes, such as those impacting equipment, operations, infrastructure, training, people, plans and procedures, and takes action to manage associated risk
- **E4.7** An Environmental case is maintained throughout the acquisition lifecycle that identifies, evaluates and manages the risk from concept development through to disposal.
- **E4.8** The Defence Organisation has mechanisms in place to identify and deliver environmental opportunities within its sphere of influence.

#### Documents often associated with this element:

- 1LOD assurance reports
- Agenda and minutes of the HS&EP committee meetings (Strategic, Tactical and Working)
- Industry engagement (networking, conference, industry days)
- Change management process and plan
- · Change risk register and examples of use
- · Communications plan,
- · Corporate risk register
- Continual Improvement (CI) log and process
- Defence Organisation EMS
- Duty holding construct and letters of delegation and acceptance
- Emergency arrangements and escalation process
- Environmental Aspects Register
- Industry engagement (Networking, Conference, Industry days)
- Incident reporting log
- Knowledge sharing forums
- Learning from Experience (LfE) communications
- Quarterly Performance and Risk Review (QP&RR)
- Risk management plan including escalation process
- SLT risk review meeting minutes and actions
- Environment case policy application and risk assessments
- Environment case reports and reviews
- Top eight risks
- Environmental Impact Assessments

# **Expectation 4.1** The Defence organisation has mechanisms in place to assess its risk profile and identify its Environmental aspects

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>Environmental aspects and associated risk profile are not clearly defined or documented</li> </ul>	<ul> <li>Environmental aspects are identified but there is a limited risk profile.</li> </ul>	<ul> <li>Environmental aspects are identified and there is a complete risk profile.</li> </ul>	<ul> <li>Environmental aspects are identified, and the risk profile is regularly reviewed.</li> </ul>
<ul> <li>A mechanism may be in place to identify environmental aspects, but this is not adequately defined or consistently implemented.</li> </ul>	<ul> <li>Mechanisms are defined for identifying environmental aspects and these are implemented but there is limited evidence of connectivity with Environmental Management.</li> <li>A risk management framework is implemented within the Defence organisation, but it is not routinely reviewed by leadership.</li> <li>Risk assessments are appropriate for their intended use but are not regularly updated by leadership.</li> </ul>	<ul> <li>Environmental aspects are consistently and systematically identified with a clear linkage to Environmental Management.</li> <li>A risk management framework is applied across the Defence organisation and regularly reviewed by leadership.</li> <li>Risk assessments are adequately designed to capture risk mitigation activities. They are regularly reviewed by leadership.</li> </ul>	<ul> <li>The identification of environmental aspects involves a range of stakeholders and clearly encompasses life-cycle issues.</li> <li>A risk management framework is developed and used across the Defence organisation, it is owned by leadership and used to drive continual improvement in environmental performance.</li> <li>Risk assessments are well designed to capture risk mitigation activities. They are</li> </ul>

**Expectation 4.2** The Defence organisation has mechanisms in place to manage its environmental risks and impacts, including provision of proportionate controls.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
Risk assessments are not used to develop proportionate controls to mitigate the environmental risks associated with the Defence organisation's operations.	<ul> <li>Risk assessments are used to develop controls to mitigate environmental risks. However, this process is not always applied effectively.</li> <li>Risk assessments contain insufficient environmental information and do not help the Defence organisation implement and maintain proportionate controls.</li> <li>The Best Practicable Environmental Option (BPEO) is not properly taken into account when defining controls.</li> </ul>	<ul> <li>Risk assessments containing relevant environmental information relating to identified environmental aspects resulting in mostly effective and relevant controls.</li> <li>The BPEO is consistently taken into account when defining controls.</li> </ul>	<ul> <li>Risk assessments consider the Environmental impacts of wider risks and are frequently reviewed by leadership.</li> <li>Proportionate controls are in place to mitigate risks and are developed in conjunction with relevant stakeholders through continual improvement.</li> <li>The BPEO is regularly reviewed in consultation with stakeholders and relevant internal or external experts to maintain current knowledge.</li> </ul>

**Expectation 4.3** Where Environmental risks and impacts are significant these risks are elevated and Leadership are actively involved in their management.

	No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
•	Significant environmental risks and impacts are not elevated.  Leadership is not aware of environmental risks nor involved in their management.	<ul> <li>Significant environmental risks and impacts are elevated on an adhoc basis. However, there are significant weaknesses in the process,</li> <li>Leadership are not aware of, or involved in the management of significant environmental risks.</li> </ul>	<ul> <li>The majority of significant environmental risks and impacts are elevated and leadership is made aware.</li> <li>Leadership is involved in the management of the majority of significant environmental risks.</li> </ul>	<ul> <li>All significant environmental risks and impacts are elevated.</li> <li>There is clear evidence that Leadership is actively aware of, and involved in the management of all significant environmental risks.</li> </ul>

**Expectation 4.4** The Defence organisation has arrangements in place to ensure communication of Environmental aspects, risks, impacts and opportunities to all stakeholders, outlining control measures needed to deliver effective Environmental Management.

#### No Assurance

- There are no arrangements in place for the communication of the Environmental aspects, risks, impacts and opportunities faced by the Defence organisation.
- Control measures to address risks and impacts are not made available to those who need them.

#### **Limited Assurance**

- Some arrangements exist for the communication of Environmental aspects, risks, impacts and opportunities faced by the Defence organisation on an adhoc basis. The arrangements are not systematically defined or implemented, and information is not frequently updated.
- Control measures to address risks and impacts are only made available on request.

#### **Substantial Assurance**

- Arrangements exist for the communication of Environmental aspects, risks, impacts and opportunities faced by the Defence organisation. However weaknesses remain in the breadth of issues communicated and stakeholders engaged with.
- Control measures to address risks and impacts are made available to all stakeholders.

- Comprehensive arrangements exist for the communication of Environmental aspects, risks, impacts and opportunities faced by the Defence organisation.
- Control measures are clearly stated and structured in such a way as to deliver effective Environmental Management for the Defence organisation and proactively communicated to all stakeholders

**Expectation 4.5** The Defence organisation has mechanisms in place to continually improve risk management with the aim of protecting the environment from harm.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>The Defence organisation has no evidence of mechanisms for continually improving control of environmental risks.</li> </ul>	The Defence organisation has mechanisms in place to continually improve environmental risk management, but there are significant weaknesses in design or application.	The Defence organisation has mechanisms in place to continually improve environmental risk management, with only minor weaknesses in design or application.	The Defence organisation has effective mechanisms in place to continually improve environmental risk management, and the mechanisms are aligned to reducing harm, enhancing
	<ul> <li>The mechanisms are not aligned to reducing harm, enhancing capability and minimising environmental impacts.</li> </ul>	<ul> <li>The mechanisms are largely aligned to reducing harm, enhancing capability and minimising environmental impacts.</li> </ul>	capability and minimising environmental impacts.

**Expectation 4.6** The Defence organisation tracks changes which have an environmental impact, such as those impacting equipment, operations, infrastructure, training, people, plans and procedures, and takes action to manage associated environmental risk

#### No Assurance

 There is no process or system for tracking or risk assessing changes to equipment, operations, infrastructure, training, people, plans and procedures.

#### **Limited Assurance**

 The Defence organisation has a formal procedure for tracking and risk assessing changes to equipment, operations, infrastructure, training, people, plans and procedures but these are either not consistently implemented, reviewed by leadership and actions are not always tracked to completion.

#### **Substantial Assurance**

 The Defence organisation has a formal procedure for tracking and risk assessing changes to equipment, operations, infrastructure, training, people, plans and procedures that are reviewed by leadership but actions are not always tracked to completion.

- The Defence organisation has a formal procedure for tracking and risk assessing changes to equipment, operations, infrastructure, training, people, plans and procedures that are reviewed by leadership and actions are tracked to completion.
- Relevant management and stakeholders are involved in the change management and risk assessment process.

**Expectation 4.7** An Environmental case is maintained throughout the acquisition lifecycle that identifies, evaluates and manages the risk from concept development through to disposal.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
not consider environmental cases across the acquisition lifecycle of its activities.	The Defence organisation creates environmental cases for the acquisition lifecycle for some activities and equipment but does not do so consistently or adequately.  Environmental cases have significant gaps in depth and breadth.  Environmental cases are not updated frequently and are not accessible.	<ul> <li>The Defence organisation creates environmental cases for the acquisition lifecycle for those activities and equipment requiring them. Environmental cases are assured but with minor weaknesses.</li> <li>Environmental cases have minor weaknesses in depth and breadth.</li> <li>Environmental cases are not always kept updated throughout the lifecycle and / or not easily accessible.</li> </ul>	<ul> <li>The Defence organisation creates and maintains environmental cases for the acquisition lifecycle for all activities and equipment requiring them. Environmental cases are independently assured.</li> <li>Environmental cases are of appropriate depth and breadth of environmental risks.</li> <li>Environmental cases are regularly updated throughout the lifecycle and are easily accessible.</li> </ul>

**Expectation 4.8** The Defence organisation has mechanisms in place to identify and deliver environmental opportunities within its sphere of influence.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation does not consider environmental opportunities in relation to its environmental impact, business decisions, supply chain, or financial and operational benefits.	The Defence organisation considers environmental opportunities in relation to its environmental impact, business decisions, supply chain, or financial and operational benefits on an ad-hoc or infrequent basis.	<ul> <li>The Defence organisation regularly considers environmental opportunities in relation to its environmental impact, business decisions, supply chain and financial activities.</li> <li>The Defence organisation considers environmental opportunities from multiple perspectives and communicates environmental information to relevant stakeholders.</li> </ul>	<ul> <li>Environmental opportunities are reviewed on a regular basis and leadership is consistently seeking opportunities in relation to its environmental impact, business decisions, supply chain, or financial and operational benefits.</li> <li>The Defence organisation communicates its environmental opportunities and performance and any potential benefits to stakeholders across the organisation and wider Defence community.</li> <li>Where identified, environmental opportunities are consistently incorporated into the EMS.</li> </ul>

## **Element 5: Supervision, Contracting and Control Activities**

#### **Purpose**

This element ensures that the organisation has planned, implemented, maintained and reviewed control measures to meet its compliance obligations and its environmental objectives. It has arrangements for application of these systems applying through a lifecycle approach. Leadership have effective frameworks in place to ensure that they have sufficient and timely oversight of the organisation and its supply chain using the four Cs: coordination, cooperation, communication and control.

#### The Expectations in this element are:

- **E5.1** The Defence Organisation has mechanisms in place to delegate authority for the control of activities impacting the environment
- **E5.2** Those holding delegation for authority are competent and trained to discharge their environmental responsibilities and accountabilities.
- **E5.3** Those responsible for the control of activity have a mechanism in place to assess and elevate environmental risks and impacts where necessary and leadership are actively involved in their management.
- **E5.4** Delegated authority should be formally appointed and delegation documented.
- **E5.5** Those responsible for the control of activity have a duty to mitigate environmental risk using the BPEO
- **E5.6** Those responsible for the control of activity have the authority to pause or cease activity where a risk is no longer manageable through the BPEO
- **E5.7** The Defence Organisation has developed and implemented procedures according to which work must be carried out in a way to protect the Environment.

#### Documents often associated with this element:

- 1LOD assurance reports
- Audit reports such as Control of Major Accident Hazards (COMAH) requiring specific contracts to deliver
- Command / Corporate plan
- Communications plan
- Contract management and supply chain management plans including Environmental arrangements
- · Corporate risk register
- Defence Organisation Operating Model
- Defence Organisation EMS
- Documented arrangements for HS&EP co-operation with contractors lodger units (including Encroachments)
- Letter of delegation / authority / appointment including Duty Holder construct and Head of Establishment letters and acceptance
- RACI (Responsible, Accountable, Consulted, Informed) matrix
- Defence Organisational Policy

**Expectation 5.1** The Defence organisation has mechanisms in place to delegate authority for the control of activities impacting the environment.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
There are no mechanisms in place to delegate authority for the control of activities.	There is a mechanism in place to delegate authority but is not applied consistently across the Defence organisation.	There are mechanisms in place to delegate authority for the control of activities across the Defence organisation, and such delegated authorities are communicated and clear but there are some gaps in application	<ul> <li>There are mechanisms in place to delegate authority for the control of activities across the Defence organisation.</li> <li>Responsibilities are systematically identified and given in writing to teams or individuals, who demonstrate formal acceptance of these responsibilities.</li> </ul>

**Expectation 5.2** Those holding delegation for authority are competent and trained to discharge their environmental responsibilities and accountabilities.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>No training is provided to thos holding delegation of authorit</li> <li>There is no assessment performed of their competenc to understand and discharge their responsibilities and accountabilities.</li> </ul>	those holding delegation of authority.	<ul> <li>Training is provided to those holding delegation of authority.</li> <li>There are regular assessments performed of their competence to understand and discharge their responsibilities and accountabilities, but not in all cases of delegated authority.</li> </ul>	<ul> <li>Comprehensive training is provided to those holding delegation of authority and they are provided with opportunities for continual learning and development.</li> <li>There are systematic assessments performed of their competence to understand and discharge their responsibilities and accountabilities in all cases of delegated authority.</li> </ul>
			<ul> <li>Competence is assessed prior to delegation of authority and is monitored and reassessed regularly.</li> </ul>

**Expectation 5.3** Those responsible for the control of activity have a mechanism in place to assess and elevate environmental risks and impacts where necessary and leadership are actively involved in their management.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>There are no mechanisms in place for those responsible for the control of activity to assess and elevate risk and impacts.</li> <li>Leadership is not involved in risk management and understanding the potential impact to the Environment of their activities.</li> </ul>	<ul> <li>Those responsible for the control of activity have a mechanism in place to assess and elevate risks and impacts but it has not been effectively communicated or implemented.</li> <li>Leadership is aware but not involved in risk management.</li> </ul>	<ul> <li>Those responsible for the control of activity have a mechanism in place to assess and elevate risks and impacts. This has been effectively communicated and implemented, and included in work instructions, procedures, and orders as necessary.</li> <li>Leadership is aware and partially involved in risk management.</li> </ul>	<ul> <li>Mechanisms to elevate risks and impacts are regularly monitored for effectiveness and lessons learnt and shared.         Mechanisms in place are continually improved.</li> <li>Leadership is actively involved in risk management and fully understands the potential impact to the Environment of their activities.</li> </ul>

## Expectation 5.4 Delegated authority should be formally appointed and delegation documented.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
There is no evidence to show that delegated authority has been set out across the Defence organisation and documented.	Some evidence is available to demonstrate delegation of authority within the Defence organisation, through letters of delegation, formalised roles and responsibilities and documented Terms of Reference for governance groups and committees. However, these are not consistently adopted or made available.	<ul> <li>Evidence is available to demonstrate delegation of authority for the majority of activities within the Defence organisation.</li> <li>Formal governance groups and committees have signed off Terms of Reference, and letters of delegation of formalised roles and responsibilities are in place for individual positions.</li> </ul>	<ul> <li>Evidence of delegation of authority is readily available and communicated across the Defence organisation.</li> <li>Mechanisms in place are reviewed frequently and updated as needed. There is wide awareness across the organisation as to who has delegated authority, and through what documented process.</li> </ul>

## Expectation 5.5 Those responsible for the control of activity have a duty to mitigate environmental risk using the BPEO

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>The Defence organisation does not have a process in place to reduce the risk of environmental damage using the BPEO.</li> </ul>		<ul> <li>The Defence organisation has a process in place to reduce the risk of environmental damage using the BPEO which is usually applied across the organisation.</li> </ul>	<ul> <li>The Defence organisation has a process in place to reduce the risk of environmental damage using the BPEO which is always applied across the organisation.</li> </ul>
			<ul> <li>In addition, risk controls are monitored and reassessed regularly with actions taken in response.</li> </ul>

**Expectation 5.6** Those responsible for the control of activity have the authority to pause or cease activity where a risk is no longer manageable through the BPEO.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>There is no process in place to allow those in control of activities to pause or cease activity where a risk is longer manageable through the BPEO.</li> </ul>	ties to allow those in control of allow those in control of activities activities to pause or cease activity where a risk is no longer manageable through the BPEO.  • This is not applied consistently  allow those in control of activitie to pause or cease activity where a risk is no longer manageable through the BPEO.  • This is consistently applied	allow those in control of activities to pause or cease activity where a risk is no longer manageable through the BPEO.	There is a comprehensive process in place to allow those in control of activities to pause or cease activity where a risk is no longer manageable through the BPEO.
		across most activities and is well	<ul> <li>This is applied consistently across all activities.</li> </ul>
	responsibility.		<ul> <li>Those with responsibility demonstrate clear understanding of their duty/authority and understand how and why to apply it.</li> </ul>
			<ul> <li>Leadership demonstrates that those with responsibilities who pause or cease an activity are supported and not judged unreasonably.</li> </ul>

**Expectation 5.7** The Defence organisation has developed and implemented procedures according to which work must be carried out in a way to protect the Environment.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation has not developed or implemented procedures that enable work is carried out in a way to protect the Environment.	Procedures that enable work is carried out in a way to protect the Environment have been developed. However, these are either not comprehensive in their scope and content or are inconsistently applied throughout the Defence organisation and are not communicated effectively to the workforce.	<ul> <li>Procedures are consistently adopted and applied throughout the Defence organisation which address all the relevant environmental aspects of the organisation.</li> <li>Procedures are defined and their importance and application is communicated effectively to the workforce and other relevant stakeholders.</li> </ul>	<ul> <li>The Defence organisation continually improves its procedures to inform working which will protect the Environment, based on the application of lessons learned.</li> <li>Procedures are developed and maintained with crossfunctional involvement of relevant stakeholders.</li> </ul>

## Element 6: Personnel Competence, Resources and Training

#### **Purpose**

This element ensures that the organisation has adequate resources for Environmental Management aligned with its environmental aspects. It has identified all roles with Environmental Management responsibilities and has in place a means of identifying the skills, knowledge, experience, behaviours and expertise requirements of those roles. Where these needs are not met by the existing workforce, plans are developed to address and mitigate gaps through workforce planning, formal and informal training, and development. Sufficient resources and funding are identified to maintain competence and ensure continual professional development, including during changes to the organisation and its people.

#### The Expectations in this element are:

- **E6.1** The Defence Organisation has sufficient resources in place aligned to its environmental aspects.
- **E6.2** The Defence Organisation has defined responsibilities, accountabilities and delegations for Environmental management.
- **E6.3** The Defence Organisation has plans in place to support recruitment, deployment, career development, retention and succession of its people.
- **E6.4** Training programmes are in place that include Environmental Management to enable the workforce to meet Defence requirements.
- **E6.5** A competency process is in place to assess and assure the knowledge, skills, attitudes, and behaviours of the workforce to meet Defence requirements.

#### Documents often associated with this element:

- 1LOD assurance reports
- Annual Budget Cycle (ABC) planning (for inclusion of Health and Safety and Environmental requirements)
- Command / Corporate plan
- Defence Organisation business plans
- Defence Organisation Operating Model
- Defence Organisation EMS
- Skills framework
- Strategic workforce plan and succession planning
- Terms of reference for key personnel with Health, Safety and Environmental management responsibilities
- Training needs analysis

Expectation 6.1 The Defence organisation has sufficient resources in place aligned to its environmental aspects.

#### No Assurance

- There is no effective process for managing resources impacting the Defence organisation's ability to manage its risk profile.
- Resource allocation for Environmental Management is not taken into account in financial and business planning.

#### Limited Assurance

- There is a process for managing resources, but significant weaknesses exist resulting in ineffective management of the Defence organisation's risk profile.
- Environmental Management resource allocation is taken into account in finance and business planning, but limited actions are taken to address this

#### **Substantial Assurance**

- There is a process for managing resources, with only minor weaknesses, resulting in resource allocation being well balanced across the Defence organisation to reflect the organisation's risk profile.
- Environmental Management resource allocation is taken into account in finance and business planning and actions are taken to address this.

- The Defence organisation looks beyond its organisational boundaries for factors which may impact on its current resource allocation and collaborates with others to achieve continual improvement in planning future resource allocation in line with its risk profile.
- Environmental Management resource allocation is taken into account in finance and business planning and actions are taken to address this. Environmental Management resource allocation is regularly and effectively reviewed.

**Expectation 6.2** The Defence organisation has defined responsibilities, accountabilities and delegations for Environmental Management.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
Environmental Management roles, responsibilities and delegations are not defined.	<ul> <li>Environmental Management roles, responsibilities and delegations are poorly defined across the Defence organisation but not at all management and operational levels nor maintained centrally.</li> <li>The workforce is not aware of their specific responsibilities with regards to Environmental Management.</li> <li>Responsibilities, accountabilities, and delegations are infrequently reviewed and</li> </ul>	<ul> <li>Environmental Management roles, responsibilities and delegations are clearly defined and documented for all levels of the workforce.</li> <li>The workforce is aware of their specific responsibilities with regards to Environmental Management.</li> <li>Responsibilities, accountabilities, and delegations are regularly updated.</li> </ul>	<ul> <li>Environmental Management roles, responsibilities and delegations are systematically reviewed to reflect changes in resourcing, accountabilities and authorities.</li> <li>Roles, responsibilities and delegations are actively communicated and the workforce demonstrates clear understanding and acceptance of their roles and responsibilities through actions they take in relation to Environmental Management.</li> </ul>
	updated.		

**Expectation 6.3** The Defence organisation has plans in place to support recruitment, deployment, career development, retention and succession of its people with responsibilities for environmental management.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation does not have plans in place to support recruitment, workforce development or competency management.	<ul> <li>The Defence organisation has some plans to support recruitment, deployment, career development, retention and succession of its people in Environmental Management. However this does not translate into effective policies and there is a misalignment of objectives.</li> <li>There are minimal attempts to revise recruitment plans and there are limited reviews on workforce policies relating to recruitment, selection and training.</li> </ul>	<ul> <li>The Defence organisation has plans to manage organisational competence including deployment, career development, retention and succession and resilience planning.</li> <li>These are generally effective and subject to periodic review, with outcomes feeding into workforce policies on recruitment, selection and training.</li> </ul>	<ul> <li>Highly effective plans are in place for recruitment, deployment, career development, retention and succession planning for Environmental Management workforce.</li> <li>Plans are supported by training programmes, with regular reviews to meet objectives and applicable legal or other requirements.</li> <li>All of the workforce receive periodic performance reviews at which performance feedback is provided and training and development opportunities are identified,</li> </ul>
			<ul> <li>planned and implemented.</li> <li>Adoption of good practices from outside the organisation's boundary to drive continual improvement.</li> </ul>

**Expectation 6.4** Training programmes are in place that include Environmental Management to enable the workforce to meet Defence requirements.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
There is no evidence that training programmes are in place that include Environmental Management skills.	<ul> <li>There is limited evidence that training programmes are in place that include Environmental Management skills. Where present the level of effectiveness varies.</li> <li>Training is provided on an adhoc basis when needs are identified locally. There is an incomplete or incoherent plan to provide Environmental training for all who need it.</li> </ul>	<ul> <li>There is evidence that training programmes are in place that include Environmental skills, with content which is regularly refreshed as good practice evolves.</li> <li>Training is provided regularly when needs are identified and centrally coordinated and communicated throughout the Defence organisation.</li> </ul>	<ul> <li>There is a systematic training programmes in place that include Environmental skills with effective mechanisms in place to continually improve and draw on cutting edge techniques and good practice.</li> <li>Training programmes are clearly targeted to address the Defence organisations specific environmental aspects, risks and impacts.</li> <li>Adherence is monitored formally. Environmental training requirements are reviewed and updated annually.</li> </ul>

**Expectation 6.5** A competency process is in place to assess and assure the knowledge, skills, attitudes, and behaviours of the workforce to meet Defence requirements.

No Assurance Limited Assurance	Substantial Assurance	Full Assurance
competency evaluation processes to assess and assure knowledge, skills, attitudes and behaviours of the workforce to meet Defence requirements.  evaluation processes to assess and assure the knowledge, skills, attitudes and behaviours of the workforce to meet Defence Environmental Management requirements and this is not carried out consistently across the Defence organisation.	<ul> <li>There are competency evaluation processes to assess and assure the knowledge, skills, attitudes and behaviours of the workforce to meet Defence Environmental Management requirements with only minor weaknesses evident.</li> <li>There are arrangements in place to develop skills through CPD. There is limited engagement with CPD opportunities.</li> </ul>	<ul> <li>There are robust competency evaluation processes to assess and the knowledge, skills, attitudes and behaviours of the workforce to meet Defence Environmental Management requirements, including well established CPD arrangement</li> <li>There are clear arrangements in place to develop skills through continuing professional development (CPD). They are widely understood and engaged with.</li> </ul>

## Element 7: Equipment Design, Manufacture and Maintenance

#### **Purpose**

This element ensures that the organisation has put in place controls to incorporate Environmental requirements into the lifecycle of equipment including Defence digital systems.

#### The Expectations in this element are:

- **E7.1** The Defence Organisation has mechanisms in place to identify and assess Environmental risks, impacts and requirements associated with equipment throughout its entire lifecycle; from Concept, Assessment, Demonstration, Manufacture, In-service and Disposal (CADMID).
- **E7.2** The Defence Organisation has mechanisms in place to ensure risks and impacts associated with equipment are adequately controlled and mitigated through its entire lifecycle and where necessary elevated to the appropriate SRO and competent person.
- E7.3 The Defence organisation has mechanisms in place to ensure equipment is compliant with statute and Defence regulation throughout its lifecycle. Where necessary, a derogation, exemption or disapplication (DED) / waiver / concession is in place where compliance is not achievable.
- **E7.**4 The Defence Organisation has processes in place to ensure equipment is always maintained and operated within defined design and operating limits to avoid environmental damage. Mechanisms are in place to communicate these operating limits to those who operate and maintain equipment.
- **E7.5** The Defence organisation has mechanisms in place to ensure physical changes to equipment, (including major software changes), materials and associated specifications are evaluated, the environmental risk and impacts assessed, approved and documented.
- **E7.6** The Defence Organisation has mechanisms to accurately identify and manage the Environmental risks, impacts and dependencies in their equipment supply chain.
- **E7.7** Lessons learned from previous equipment design, acquisition, manufacture, operation, modification, maintenance and end of life activities are shared effectively across the Defence Organisation.
- **E7.8** The Defence Organisation has mechanisms in place to assess the risk from integration of equipment and systems and its effects on the Environment.

#### Documents often associated with this element

- 10-year infrastructure management plan
- ABC planning (for inclusion of environmental requirements
- Acquisition, Safety and Environmental Management System (ASEMS) compliance document
- Agenda and minutes of the Capability Management Group meetings
- Agenda and minutes of the Equipment and support steering group meetings
- Annual Budget Cycle (ABC) options
- Asset register
- Capability management strategy and plans
- Command / corporate plan
- Contract management and supply chain management plans •
- Corrective action plans arising from Assurance, Equipment Design and Infrastructure design
- Defence organisation business plans
- Defence organisation Operating Model
- Defence organisation EMS
- Equipment plan
- Exemplar environmental case reports
- Key user requirements including Environmental management
- Operation and Maintenance (O&M) management system for highrisk equipment
- Major equipment acquisition or replacement of equipment at end of life (e.g., weapons) plan / schedule
- Routine calibration
- Standard Operating Procedures

**Expectation 7.1** The Defence organisation has mechanisms in place to identify and assess Environmental risks, impacts and requirements associated with equipment throughout its entire lifecycle; from Concept, Assessment, Demonstration, Manufacture, In-service and Disposal (CADMID).

#### No Assurance

- The Defence organisation does not have a mechanism in place to identify and assess Environmental risks and impacts.
- The Defence organisation has not taken into account the effects of equipment usage on the Environment and impact of Environmental conditions on equipment design, storage, and use.

#### **Limited Assurance**

- The Defence organisation has a mechanism to identify and assess Environmental risks and impacts throughout the equipment lifecycle, however significant weaknesses exist.
- The Defence organisation has taken into account limited effects of equipment usage on the Environment and impact of Environmental conditions on equipment design, storage, and use.

#### **Substantial Assurance**

- Mechanisms are in place to identify and assess
   Environmental risks and impacts throughout the entire equipment lifecycle with only minor weaknesses
- Environmental risk assessments include specific consideration of usage context.
- The Defence organisation has taken into account some of the effects of equipment usage on the Environment and impact of Environmental conditions on equipment design, storage, and use.

- Mature mechanisms are in place to identify and assess Environmental risks and impacts throughout the entire equipment lifecycle.
- Risks are formally re-assessed on a continual basis throughout the rest of its lifecycle (including change of use or retrofitting).
   Lessons learned are shared and applied across the Defence organisation.
- The Defence organisation has taken into account the effects of equipment usage on the Environment and impact of Environmental conditions on equipment design, storage, and use.

**Expectation 7.2** The Defence organisation has mechanisms in place to ensure environmental risks and impacts associated with equipment are adequately controlled and mitigated through its entire lifecycle and where necessary elevated to the appropriate SRO and competent person.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
Environmental risks and impacts are identified but there are no mechanisms in place to control and mitigate or elevate those risks or impacts.	<ul> <li>The Defence organisation has a mechanism to control and mitigate Environmental risks and impacts however it does not address the full lifecycle or is not well implemented.</li> <li>Risk are infrequently elevated to the appropriate SRO, and competent person and when elevated rarely addressed.</li> </ul>	<ul> <li>The Defence organisation has a mechanism to control and mitigate Environmental risks and impacts throughout the entire lifecycle and this is substantially implemented.</li> <li>Risk are consistently elevated to the appropriate SRO, and competent person. When elevated the SRO or competent person act on elevated risks, however responses are sometimes insufficient.</li> </ul>	<ul> <li>Processes and controls to manage Environmental risks and impacts are fully implemented and regularly updated, following identification of new risks and reassessment of existing risks, lessons learned are applied.</li> <li>SROs and competent persons act on risks elevated and ensure risks are effectively controlled and mitigated.</li> </ul>

**Expectation 7.3** The Defence organisation has mechanisms in place to ensure equipment is compliant with statute and Defence regulation throughout its lifecycle. Where necessary, a derogation, exemption or disapplication / waiver / concession is in place where compliance is not achievable.

#### No Assurance

- The Defence organisation does not have mechanisms in place to ensure equipment is compliant with statute.
- The Defence organisation does not have mechanisms in place to ensure that any requirements for legislative DEDs are identified, recorded and implemented at the earliest possible stage.
- Exemptions / waivers / concessions are not routinely in place where statutory and regulatory compliance is unachievable.

#### **Limited Assurance**

- The Defence organisation has mechanisms in place to ensure equipment is compliant with statute and Defence regulation, but these are not reviewed when there are changes to the organisation's equipment portfolio.
- The Defence organisation has some mechanisms in place to ensure legislative DEDs are identified. However, these are not implemented at the earliest stage, or monitored for expiration and change during the equipment lifecycle.
- Exemptions / waivers / concessions are put in place where statutory and regulatory compliance is not achievable, but this only occurs late in the lifecycle.

#### **Substantial Assurance**

- The Defence organisation has mechanisms in place to ensure equipment is compliant with statute and Defence regulation and these are reviewed throughout the equipment lifecycle.
- Legislative DEDs are identified, recorded and implemented at the earliest possible stage. There is some monitoring in place to identify expiration and change during the equipment lifecycle.
- Exemptions / waivers / concessions from compliance with statute and Defence regulations are well understood, recorded, and monitored centrally. All exemptions / waivers / concessions are requested early in the lifecycle.

- The Defence organisation actively monitors changes in statute, Defence regulation, technology, social, environmental and political influences, and applicability to retrofitted equipment to remain compliant with changing requirements.
- Well established mechanisms are in place to identify, record and implement derogations and disapplication's at the earliest possible stage. These are actively monitored for expiration and change during the equipment lifecycle.
- Exemptions / waivers / concessions are approved for defined periods early in the lifecycle and compliance with statute and Defence regulation is reviewed prior to the expiry date.

**Expectation 7.4** The Defence organisation has processes in place to ensure equipment is always maintained and operated within defined design and operating limits to avoid environmental damage. Mechanisms are in place to communicate these operating limits to those who operate and maintain equipment.

# No Assurance The Defence organisation has no processes in place to always maintain and operate within

limits.

#### Operating limits are not defined or communicated to those who operate and maintain equipment.

defined design and operating

#### **Limited Assurance**

- The Defence organisation has a largely reactive approach to maintenance.
- Where planned maintenance is in place there is no consistent prioritisation process and delays are evident.
- Operating limits are defined, but not well communicated on a timely basis to those who operate and maintain equipment.

#### **Substantial Assurance**

- There is evidence of an effective and predictive maintenance regime across the Defence organisation.
- Operating limits are clearly defined and communicated to those who operate and maintain equipment. This includes changes made to the defined design or operating limits of equipment out of its initial intended use. Where operating limits are exceeded, these are monitored, with documented action taken to maintain operating capability.

- The Defence organisation has successfully implemented an effective preventative maintenance regime which includes a prioritisation process
- Operating limits are regularly reassessed so that equipment is maintained and operated within defined design and operating limits. Those who operate and maintain equipment are actively consulted during risk reviews and findings are communicated to them. Where operating limits are exceeded, these are documented and monitored, with action taken.

**Expectation 7.5** The Defence organisation has mechanisms in place to ensure physical changes to equipment, (including major software changes), materials and associated specifications are evaluated, the environmental risk and impacts assessed, approved and documented.

No Assurance	Limited Assurance	<b>Substantial Assurance</b>	Full Assurance
Physical changes to equipment are not formally evaluated and impacts and risks not assessed and documented.	The Defence organisation has mechanisms in place to ensure physical changes to equipment are evaluated. However, a suitable and sufficient risk-assessment is not consistently performed, and controls are not formally documented or communicated.	<ul> <li>The Defence organisation has mechanisms in place which are substantially implemented to ensure physical changes to equipment are evaluated, risk-assessed and documented.</li> <li>Those who operate, maintain, inspect, and manage equipment are consulted in the evaluation process. Mitigating controls are formally approved by an appropriately competent person before being communicated across the Defence organisation.</li> </ul>	Physical changes to equipment are consistently and proactively anticipated based on ongoing risk-assessments of the Defence organisations equipment portfolio. Changes are evaluated and risk assessed on a timely basis. Input is encouraged from stakeholders who maintain, use, and are affected by the operation of this equipment.

and understood.

**Expectation 7.6** The Defence organisation has mechanisms to accurately identify and manage the Environmental risks, impacts and dependencies in their equipment supply chain.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
There is no consideration for Environmental risks and impacts from equipment throughout the Defence organisation's supply chain.	<ul> <li>Management of Environmental risks from equipment are reliant upon the supply chain providing details of Environmental risks and impacts.</li> <li>Risk ownership along the supply chain is not well defined with respect to dependencies between Defence organisations and the supply chain.</li> </ul>	<ul> <li>Environmental risks from equipment are shared openly between organisations and their supply chains.</li> <li>Risk ownership is understood along the supply chain and dependencies between Defence organisations documented.</li> </ul>	<ul> <li>Environmental risks from equipment are shared between Defence organisations, and these are recorded, regularly monitored, and collaboratively mitigated and managed.</li> <li>Risk ownership along the supply chain is proactively managed and deconflicted will all dependencies between Defence organisations well documented</li> </ul>

**Expectation 7.7** Lessons learned from previous equipment design, acquisition, manufacture, operation, modification, maintenance and end of life activities are shared effectively across the Defence organisation.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>Equipment information is not held centrally for the whole Defence organisation to access.</li> <li>Lessons learned are not formally documented or applied to future operations.</li> <li>There is no evidence that lessons learned have occurrence or recurrence of Environmental impacts.</li> </ul>	<ul> <li>Equipment information is maintained centrally, however not effectively communicated across the Defence organisation.</li> <li>Lessons learned are documented but are not effectively communicated across the Defence organisation.</li> <li>There is some evidence that lessons learned have occurrence or recurrence of Environmental impacts.</li> </ul>	<ul> <li>Equipment information is maintained centrally and is communicated across the Defence organisation.</li> <li>Lessons learned are documented and well communicated across the Defence organisation when required.</li> <li>There is good evidence that lessons learned have occurrence or recurrence of Environmental impacts.</li> </ul>	<ul> <li>Lessons learned are documented and are proactively communicated across the Defence organisation and wider Defence.</li> <li>There is widespread evidence that lessons learned have occurrence or recurrence of Environmental impacts.</li> </ul>

**Expectation 7.8** The Defence organisation has mechanisms in place to assess the risk from integration of equipment and systems and its effects on the Environment.

to assess the risk from place. Not all equipment and substantially assessed, integration of equipment and	No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
systems and its effects on the Environment.  • Lessons learned from previous integration of equipment and systems are not documented nor communicated across the Defence organisation.  • Lessons learned from previous integration of equipment and systems are documented and communicated across the Defence organisation.  • Lessons learned from previous integration of equipment and systems are documented and communicated across the Defence organisation.  • Lessons learned from previous integration of equipment and systems are documented and communicated across the Defence organisation.  • Risks are managed through a structured approach and align to appropriate delegations.  • Integration risks are formally reassessed throughout the	to assess the risk from integration of equipment and systems and its effects on the	<ul> <li>place. Not all equipment and system integration risk is assessed.</li> <li>Lessons learned from previous integration of equipment and systems are not documented nor communicated across the</li> </ul>	substantially assessed, recorded and communicated across the Organisation.  • Lessons learned from previous integration of equipment and systems are documented and communicated across the	systems are documented and are proactively communicated across the Defence organisation and wider Defence and have been proven to prevent recurrence of Environmental impacts.  Risks are managed through a structured approach and aligned to appropriate delegations.  Integration risks are formally reassessed throughout the lifecycle of the equipment and

## Element 8: Infrastructure Design, Build and Maintenance

#### **Purpose**

This element ensures that the organisation has put in place frameworks and controls to incorporate Environmental requirements into the lifecycle of infrastructure

### The Expectations in this element are:

- **E8.1** The Defence Organisation has mechanisms in place to identify and assess Environmental risks, impacts and requirements associated with infrastructure throughout its entire lifecycle; from Concept, Assessment, Design, Manufacture and Construction, Use, Maintenance, and Disposal.
- **E8.2** The Defence Organisation has mechanisms in place to ensure environmental risks and impacts associated with infrastructure are adequately controlled and mitigated through its entire lifecycle and including through elevation to the SRO, Head of Establishment, or competent person.
- **E8.3** The Defence organisation has mechanisms in place to ensure infrastructure is compliant with environmental statute and Defence environmental regulation throughout its lifecycle. Where necessary, an exemption / waiver / concession is in place where compliance is not achievable.
- **E8.4** The Defence Organisation has processes in place to ensure infrastructure is maintained and operated within its intended use to avoid environmental damage. Mechanisms are in place to communicate these processes to the workforce that operate and maintain the infrastructure.
- **E8.5** The Defence Organisation has mechanisms in place to ensure physical changes or operation outside the original defined design intent to infrastructure, (including major software changes), materials and associated specifications are evaluated, the risks and impacts assessed, approved, and documented.
- **E8.6** The Defence Organisation has mechanisms to accurately identify and manage the Environmental risks and dependencies in their infrastructure supply chain.
- E8.7 Lessons learned from previous infrastructure design, acquisition, build, operation, modification, maintenance and disposal activities are shared effectively across the Defence organisation.

#### Documents often associated with this element:

- 10-year infrastructure management plan
- Agenda and minutes of the Equipment and Support steering group meetings
- Annual Budget Cycle (ABC) planning (for inclusion of Environmental requirements such as routine calibration
- Command Infrastructure Delivery Plan (CIDP)
- Command / Corporate plan
- Contract management and supply chain management plans
- Corrective action plans arising from assurance, equipment design and infrastructure design
- Defence organisation business plans
- Defence organisation Operating Model
- Defence organisation EMS
- Exemplar Environmental case reports
- Establishment Management Plans
- Project plans including Royal Institute of British
- Architects (RIBA) stages

**Expectation 8.1** The Defence organisation has mechanisms in place to identify and assess Environmental risks, impacts and requirements associated with infrastructure throughout its entire lifecycle, from Concept, Assessment, Design, Manufacture and Construction, Use, Maintenance, and Disposal.

#### Limited Assurance **Full Assurance** No Assurance **Substantial Assurance** The Defence organisation does The Defence organisation has a • The Defence organisation has a Risks, impacts and not have a mechanism in place mechanism to identify and mechanism to identify and requirements are formally to identify and assess assess Environmental risks. assess Environmental risks. identified and re-assessed on a continual basis throughout the infrastructure Environmental impacts and requirements impacts and requirements risks, impacts and associated with infrastructure. throughout the entire infrastructure lifecycle (including requirements. however it does not take infrastructure lifecycle. change of use and / or retrofitting), and lessons learned account of the full infrastructure • The mechanism is consistently are shared and applied across lifecycle or is not consistently implemented. implemented. the Defence organisation. Infrastructure risk assessments include specific consideration of as-built use and any change of use.

**Expectation 8.2** The Defence organisation has mechanisms in place to ensure environmental risks and impacts associated with infrastructure are adequately controlled and mitigated through its entire lifecycle and including through elevation to the SRO, Head of Establishment or competent person.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
Environmental risks and impacts are identified there are no mechanisms in place to control and mitigate those risks.	<ul> <li>The Defence organisation has a mechanism to control and mitigate infrastructure         Environmental risks and impacts however it does not take account of the full infrastructure lifecycle.</li> <li>Risks are infrequently elevated to the appropriate SRO, Head of Establishment, and competent person however this is not consistently undertaken across the Defence organisation.</li> </ul>	<ul> <li>The Defence organisation has a mechanism to control and mitigate infrastructure         Environmental risks and impacts, throughout the entire lifecycle</li> <li>Risks are consistently elevated to the appropriate, SRO, Head of Establishment, and competent person across the Defence organisation. When elevated the SRO, Head of Establishment or competent person acts on elevated risks, however responses are sometimes insufficient</li> </ul>	<ul> <li>Processes and controls to manage Environmental risks are regularly updated, following identification of new risks and reassessment of existing risks, lessons learned are applied.</li> <li>SRO, head of establishment, and competent persons act on risks elevated and ensure risks are controlled and mitigated.</li> </ul>

**Expectation 8.3** The Defence organisation has mechanisms in place to ensure infrastructure is compliant with environmental statute and Defence environmental regulation throughout its lifecycle. Where necessary, a derogation, exemption or disapplication / waiver / concession is in place where compliance is not achievable.

#### No Assurance

- The Defence organisation does not have mechanisms in place to ensure infrastructure is compliant with statute
- The Defence organisation does not have mechanisms in place to ensure that any requirements for legislative DEDs are identified, recorded and implemented at the earliest possible stage.
- Exemptions / waivers / concessions are not routinely in place where statutory and regulatory compliance is unachievable.

#### **Limited Assurance**

- The Defence organisation has mechanisms in place to ensure infrastructure is compliant with statute and Defence regulation, but these are but these are not reviewed when there is a change of use proposed or realised
- The Defence organisation has some mechanisms in place to ensure legislative DEDs are identified. However, these are not implemented at the earliest stage, or monitored for expiration and change during the infrastructure lifecycle.
- Exemptions / waivers / concessions are put in place where statutory and regulatory compliance is not achievable, but this only occurs late in the lifecycle.

#### **Substantial Assurance**

- The Defence organisation has mechanisms in place to ensure infrastructure is compliant with statute and Defence regulation and these are reviewed throughout the infrastructure lifecycle.
- Legislative DEDs are identified, recorded and implemented at the earliest possible stage. There is some monitoring in place to identify expiration and change during the infrastructure lifecycle.
- Exemptions / waivers / concessions from compliance with statute and Defence regulations are well understood, recorded, and monitored centrally. All exemptions / waivers / concessions are requested early in the lifecycle.

- The Defence organisation actively monitors changes in statute, Defence regulation, technology, social, environmental and political influences, and applicability to retrofitted infrastructure to remain compliant with changing requirements
- Where required, infrastructure is upgraded, refurbished, retrofitted and / or decommissioned to remain compliant with requirements
- Well established mechanisms are in place to identify, record and implement derogations and disapplication's at the earliest possible stage. These are actively monitored for expiration and change during the infrastructure lifecycle.
- Exemptions / waivers / concessions are approved for defined periods early in the lifecycle and compliance with statute and Defence regulation is reviewed prior to the expiry date.

**Expectation 8.4** The Defence organisation has processes in place to ensure infrastructure is maintained and operated within defined design intent to avoid environmental harm. Mechanisms are in place to communicate these processes to the workforce that operate and maintain the infrastructure.

#### No Assurance

- The Defence organisation has no processes in place to maintain and operate infrastructure within defined design limits and operating specifications.
- Design limits are not defined or communicated to those who interface with the infrastructure.

#### **Limited Assurance**

- The Defence organisation has a largely reactive approach to maintenance. Where planned maintenance is in place there is no consistent prioritisation process and delays are evident.
- Intended use limits are defined, but not well communicated on a timely basis to those who interface with infrastructure

#### **Substantial Assurance**

- The Defence organisation has successfully implemented an effective preventative maintenance regime which includes a prioritisation process.
- Environmental critical infrastructure is identified and is subject to specific procedures and protocols and this is communicated.
- Risks which impact effectiveness of Environmental critical infrastructure controls are elevated promptly and the continued use of the infrastructure is avoided where possible.
- Intended use and operating limits are clearly defined and communicated to those who interface with infrastructure. This includes where changes are made to the intended use or operating limits of infrastructure out of its initial intended use. Where operating limits are exceeded, these are monitored, with documented action taken to maintain operating capability.

- There is evidence of an effective and predictive maintenance regime across the Organisation.
- Intended use and operating limits are regularly reassessed so that infrastructure is maintained and operated within those intended use and operating limits. Those who interface with infrastructure are actively consulted during risk reviews and findings are communicated to them.

**Expectation 8.5** The Defence organisation has mechanisms in place to ensure physical changes or operation outside the original defined design intent to infrastructure, (including major software changes), materials and associated specifications are evaluated, the risks and impacts assessed, approved and documented.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
Physical changes to infrastructure are not formally evaluated, risk and impacts assessed and documented.	The Defence organisation has mechanisms in place to ensure physical changes to infrastructure are evaluated. However, a suitable and sufficient risk and impact assessment is not consistently performed, and controls are not formally documented or communicated.	<ul> <li>The Defence organisation has mechanisms in place to ensure the majority of physical changes to infrastructure are evaluated, risk and impact assessed and documented with some gaps present.</li> <li>Environmental controls are formally approved by an appropriately competent person before being communicated across the Defence organisation.</li> </ul>	<ul> <li>Physical changes to infrastructure are anticipated based on ongoing risk and impact assessments of the Defence organisation's infrastructure portfolio.</li> <li>Changes are evaluated and risk and impact assessed regularly. Input is encouraged from stakeholders who maintain, use, and are affected by the operation of this infrastructure.</li> </ul>

**Expectation 8.6** The Defence organisation has mechanisms to accurately identify and manage the Environmental risks and dependencies in their infrastructure supply chain.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
There is no consideration for infrastructure Environmental risk management throughout the Organisation's supply chain.	<ul> <li>Infrastructure Environmental risk management is reliant upon the supply chain providing details of Environmental risks.</li> <li>Risk ownership is not well defined with respect to dependencies between organisations and the supply chain.</li> </ul>	<ul> <li>Infrastructure Environmental risks are shared openly between organisations and their supply chains.</li> <li>Risk ownership is understood and dependencies between organisations documented.</li> </ul>	<ul> <li>Infrastructure Environmental risks are shared between organisations, and these are recorded, regularly monitored, and collaboratively mitigated and managed.</li> <li>Risk ownership is well understood and dependencies between organisations documented. Where dependencies are present these are proactively managed and deconflicted.</li> </ul>

Expectation 8.7 Lessons learned from previous infrastructure design, acquisition, build, operation, modification, maintenance and disposal activities are shared effectively across the Defence organisation.

### No Assurance

- Infrastructure information is not held centrally for the whole Defence organisation to access.
- Lessons learned from previous infrastructure design, acquisition, build, operation, modification. maintenance and disposal activities are not formally documented.
- Procedures are not in place to notify potential users of infrastructure determined to be defective or inappropriate for specific uses.
- There is no evidence that lessons learned have occurrence or recurrence of **Environmental impacts**

### Limited Assurance

- Infrastructure information is maintained centrally, however not effectively communicated across the Defence organisation.
- Lessons learned from previous infrastructure design, acquisition, build. operation, modification. maintenance and disposal activities are documented but are not effectively communicated across the Defence organisation.
- Procedures are in place but are not consistently used to notify potential users of infrastructure determined to be defective or inappropriate for specific uses.
- There is some evidence that lessons learned have occurrence or recurrence of **Environmental impacts**

# Substantial Assurance

- Infrastructure information is maintained centrally and is communicated across the Defence organisation.
- Lessons learned from previous build, operation, modification. maintenance and disposal activities are documented and communicated across the Defence organisation.
- Procedures are in place and are used to notify potential users that infrastructure has been determined to be defective or inappropriate for specific uses.
- There is good evidence that lessons learned have occurrence or recurrence of **Environmental impacts**

## **Full Assurance**

- Infrastructure information is maintained centrally and is proactively communicated across the Defence organisation.
- infrastructure design, acquisition. Lessons learned from previous infrastructure design, acquisition, build, operation, modification. maintenance and disposal activities are documented and are proactively communicated across the Defence organisation and wider Defence
  - Procedures are in place and consistently used to notify potential users of infrastructure determined to be defective or inappropriate for specific uses.
  - There is widespread evidence that lessons learned have occurrence or recurrence of Environmental impacts.

# Element 9: Performance, Management Information and Reporting

# **Purpose**

This element ensures that the organisation has put in place the mechanisms to generate and communicate complete and accurate Management Information on a timely basis. There are methods in place to define data requirements, and then collect, record, manage and report on its Environmental performance, including incidents, and good practice.

# The Expectations in this element are

- **E9.1** The Defence Organisation has effective systems and processes in place to identify collect, measure and monitor Environmental performance, using documented leading, lagging and cultural performance indicators.
- **E9.2** The Defence organisation regularly reviews environmental performance and conducts trend analysis to inform decisions and implement plans to optimise it
- **E9.3** The Defence organisation has mechanisms in place to produce, report and review the management information from performance indicators and trend analysis; acting on it in a timely manner
- **E9.4** Leadership decisions around cost, schedule and military capability performance are evidence driven, including assessment of Environmental Impact
- **E9.5** Documented information is adequately stored, retained and disposed of consistent with Defence policy and legislative requirements.

## Documents often associated with this element:

- 1LOD assurance reports
- Accident, Incident, Near Miss Reporting System such as DURALS, ASIMS, NLIMS, FSIMS etc
- Agenda and minutes of management board and ExCo meetings
- Command / Corporate plan
- Continual Improvement (CI) logs
- Contract Management and Supply Chain management plans
- Defence Organisation business plans
- Defence Organisation Operating Model
- Defence Organisation SMS
- ExCo / Command Board Dashboard
- HS&EP Organisation and Arrangement (O&A) statement
- KPI targets and metrics
- People survey or equivalent e.g., Attitude Survey
- Portfolio Management Reporting System (PMRS)
- Quarterly Performance and Risk Review (QP&RR)
- Review period of KPIs by a governance forum

**Expectation 9.1** The Defence organisation has effective systems and processes in place to identify, collect, measure, and monitor Environmental performance, using documented leading, lagging, and cultural performance indicators.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation does not have a system in place to collect, measure and monitor Environmental performance.	<ul> <li>The Defence organisation has mechanisms in place to collect, measure and monitor         Environmental performance.</li> <li>These processes are not effectively implemented, or leading, lagging, and cultural performance indicators are not standardised.</li> </ul>	<ul> <li>The Defence organisation has mechanisms in place to collect, measure and monitor key elements of Environmental performance.</li> <li>These processes are substantially implemented and are coherent with standardised leading, lagging, and cultural performance indicators.</li> </ul>	<ul> <li>The Defence organisation has mechanisms in place to collect, measure and monitor all elements of Environmental performance.</li> <li>These processes are fully implemented and are fully aligned with standardised leading, lagging, and cultural performance indicators which are regularly reviewed and shared with wider Defence.</li> </ul>

**Expectation 9.2** The Defence organisation regularly reviews environmental performance and conducts trend analysis to inform decisions and implement plans to optimise it.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation does not review any performance or conduct trend analysis to inform decisions and correct general performance deficits.	<ul> <li>The Defence organisation reviews performance and conducts trend analysis however this is not routine and is reactive to events and incidents.</li> <li>Performance and analysis are not used consistently to inform decisions and corrective actions.</li> </ul>	<ul> <li>The Defence organisation proactively reviews performance and conducts trend analysis.</li> <li>Performance and analysis are often used to inform decisions and corrective actions.</li> </ul>	<ul> <li>The Defence organisation proactively and systematically reviews performance and conducts trend analysis.</li> <li>Performance and analysis data are demonstrably used to inform decisions and help predict emerging trends, identify opportunities and to proactively improve performance.</li> </ul>

**Expectation 9.3** The Defence organisation has mechanisms in place to produce, report and review the management information from performance indicators and trend analysis, acting on it in a timely manner.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>The Defence organisation does not have mechanisms in place to produce and report complete, accurate and timely Environmental Management information.</li> <li>There is no evidence that Management information is acted on.</li> </ul>	<ul> <li>The Defence organisation has some mechanisms in place to generate and communicate Environmental Management information. However, these are rarely used applied or contain major weaknesses.</li> <li>Management information is made available at request, but not acted on in a timely</li> </ul>	<ul> <li>Mechanisms are in place to generate and communicate information across the Defence organisation in a consistent and structured way.</li> <li>Management Information is made available to all those who need it and often acted on in a timely manner.</li> </ul>	<ul> <li>Mature and well-established mechanisms are in place to generate and communicate information across the Defence organisation and available to other interested stakeholders.</li> <li>Management Information is proactively given to all those who need it, and consistently acted on in a timely manner.</li> </ul>

**Expectation 9.4** Leadership decisions around cost, schedule and military capability performance are evidence driven, including assessment of Environmental Impact.

	No Assurance	Limited Assurance	9	Substantial Assurance	I	Full Assurance
•	Leadership decisions around cost, schedule and military capability performance are not evidence driven and do not include an assessment of potential Environmental impact.	<ul> <li>Leadership decisions around cost, schedule and military capability performance are evidence driven but there is no evidence of assessment of Environmental impact.</li> </ul>	•	Leadership decisions around cost, schedule and military capability performance are evidence driven and there is evidence of assessment of Environmental impact.	•	Leadership decisions on cost, schedule and military capability are always evidence driven and consistently and proactively informed by the assessment of Environmental impact.
•	There is no record of decision making.	<ul> <li>There is a partial record of decision making, but this does not evidence the environmental information used to reach decisions.</li> </ul>	•	There is a record of decision making which evidences the environmental information used to reach decisions with minor gaps present.	•	There is a full record of decision making which evidences the environmental information used to reach decisions.

**Expectation 9.5** Documented information is adequately stored, retained, and disposed of consistent with Defence policy and legislative requirements.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>Documented information is not adequately stored, retained, and disposed of consistent with Defence policy and legislative requirements.</li> </ul>	<ul> <li>Documented information is sometimes but not always adequately stored, retained, and disposed of consistent with Defence policy and legislative requirements.</li> </ul>	<ul> <li>Documented information is most of the time adequately stored, retained, and disposed of consistent with Defence policy and legislative requirements.</li> </ul>	<ul> <li>Documented information is always adequately stored, retained, and disposed of consistent with Defence policy and legislative requirements.</li> </ul>

# **Element 10: Incident Management and Continual Improvement**

# **Purpose**

This element ensures that the organisation has frameworks in place to manage, notify, record, investigate and report Environmental incidents and how these are addressed. The organisation should promote an environment in which there is a culture of a learning so that internal and external stakeholders feel empowered to report incidents. Lessons are identified and learned through a process of continual improvement. There is a proactive approach to identifying and mitigating potential incidents through regular and effective creation and testing of emergency plans.

# The Expectations in this element are:

- **E10.1** The Defence Organisation promotes a culture of open reporting of environmental incidents and near misses that occur.
- **E10.2** The Defence Organisation has a system in place which is consistent with the Defence policy to record and report environmental incidents and near misses from initial submission to close-out, allowing for effective investigation and resolution.
- **E10.3** The Defence Organisation has systems and resources in place to investigate environmental incidents and near misses.
- **E10.4** The Defence Organisation has systems in place to implement the corrective actions and learning from incidents, and near misses to manage and drive continual improvement.
- **E10.5** Emergency and Business Continuity plans are in place, are tested regularly and consider Environmental matters.

## Documents often associated with this element:

- 1LOD assurance reports
- Actions to strengthen Management Information based on
- this learning
- Analysis and lesson learned
- Business continuity plans
- Command / Corporate plan
- Continual Improvement (CI) Logs
- Defence organisation business plans,
- Defence organisation Operating Model
- Defence organisation EMS & SMS
- Effective interface with statutory regulators
- Information collection process for Environmental management
- performance analysis and lessons learned
- Major Accident Control Regulations (MACR) plan
- Samples of emergency response exercise planning
- Whistle blower / anonymous escalation route / reporting

**Expectation 10.1** The Defence organisation promotes a culture of open reporting of environmental incidents and near misses that occur.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
People are not reporting environmental incidents and near misses that occur.	<ul> <li>People are occasionally reporting environmental incidents, and near misses that occur.</li> <li>There is limited evidence of reports being reviewed or acted upon.</li> </ul>	<ul> <li>People are consistently reporting environmental incidents, and near misses that occur.</li> <li>Reports are reviewed and acted upon by the organisation and its leadership in a timely manner.</li> <li>Investigations into root cause analysis are conducted and improvements are identified but may not be implemented in a timely manner.</li> </ul>	<ul> <li>The Defence organisation demonstrably promotes a culture that allows for people to report environmental incidents, and near misses that occur. The organisation positively re-enforces this culture.</li> <li>Leadership use reports to develop methods to prevent reoccurrence and drive continual improvement.</li> <li>The focus of investigations is on the root cause and systematic improvements, with actions being taken in response, in a timely manner.</li> <li>Those responsible for managing environmental 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.</li> </ul>

**Expectation 10.2** The Defence organisation has a system in place which is consistent with the Defence policy to record and report environmental incidents and near misses from initial submission to close-out, allowing for effective investigation and resolution.

#### No Assurance

- The Defence organisation does not have a system to record and report incidents and near misses for all stakeholders.
- Within the Defence organisation there is no, or little understanding, of the importance of leadership review of incidents, and near misses so that recurrence is prevented.

## Limited Assurance

- The Defence organisation has a system in place to record incidents and near misses, but this is either not consistent with Defence policy, does not include all stakeholders or is not effectively implemented.
- The Defence organisation conducts investigations into incidents, and near misses but they are inconsistent with Defence policy. Where incidents are reported, these are not closed out.

# **Substantial Assurance**

- The Defence organisation has a system in place which is consistent with Defence policy to record incidents and near misses which is substantially implemented and includes most stakeholders.
- The Defence organisation conducts investigations into incidents, and near misses.
   Where incidents are reported, these are close out in line with Defence policy, the majority in a timely manner.

## **Full Assurance**

- The Defence organisation has a system in place which is fully implemented and consistent with Defence policy to record incidents and near misses and includes all stakeholders.
- The Defence organisation uses root cause analysis or similar methods to avoid future event recurrence and drive continual improvement in a timely manner.
   All reported incidents are closed out in line with Defence policy in a timely manner.

**Expectation 10.3** The Defence organisation has systems and resources in place to investigate environmental incidents and near misses.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation has no systems and resources in place to investigate environmental incidents and near misses.	<ul> <li>The Defence organisation has systems in place but does not have sufficient resources to fulfil its investigatory responsibilities which results in investigations not meeting Defence policy expectations.</li> <li>Investigation effort is focused on incidents rather than also including near misses.</li> </ul>	<ul> <li>The Defence organisation has systems in place and sufficient resources to fulfil its investigatory responsibilities.</li> <li>The Defence organisation investigates near misses in addition to incidents.</li> </ul>	<ul> <li>The Defence organisation proactively assesses its investigatory resources and systems to ensure both current and future requirements can be met. The Defence organisation consistently implements systems to investigate environmental incidents and near misses.</li> <li>The Defence organisation performs investigations which produce recommendations that can be applied both within the Organisation and across the Department.</li> </ul>

**Expectation 10.4** The Defence organisation has systems in place to implement the corrective actions and learning from incidents and near misses to manage and drive continual improvement.

# No Assurance Limited Assurance Substantial Assurance Full Assurance The Defence organisation does The Defence organisation has The Defence organisation has

- The Defence organisation does not have a system in place to implement corrective actions and learning from incidents and near misses.
- The Defence organisation has systems in place to implement corrective actions and learning from incidents, incidents and near misses but does not consistently implement the system or the actions and learning.
- The Defence organisation has systems in place to implement corrective actions and learning from incidents and near misses. These are substantially implemented and used to manage and drive continual improvement and are shared across the Defence organisation.
- The Defence organisation uses its learning to better predict future incidents and take steps to mitigate ahead of realisation.
- The Defence organisation shares corrective actions and learning both internally and across wider Defence.
- The Defence organisation adopts good practice from outside the organisational boundary to drive continual improvement.
- The Defence organisation actively seeks to implement findings from investigations to support continual improvement and sharing across Defence.

**Expectation 10.5** Emergency and Business Continuity plans are in place, are tested regularly and consider Environmental matters

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>The Defence organisation does not have an emergency and business continuity plan in place.</li> </ul>	<ul> <li>An emergency and business continuity plan is in place, however it has not been tested regularly, not all responsibilities are assigned or there are gaps in competency.</li> </ul>	<ul> <li>An emergency and business continuity plan is in place and clearly considers possible events which could arise. It is tested regularly, and updates made as required.</li> </ul>	<ul> <li>An emergency and business continuity plan is in place which clearly considers relevant events which could arise. It is tested proactively and adjusted as the Defence organisations activities</li> </ul>
	<ul> <li>There is limited evidence that the plan considers Environmental matters.</li> </ul>	<ul> <li>The plan is closely linked to relevant Environmental matters for Defence and the specific Organisation.</li> </ul>	<ul> <li>A specific, detailed review is undertaken to consider relevant Environmental matters and to include these within planning.</li> </ul>

# Element 11: Communications and Stakeholder Engagement

# **Purpose**

This element ensures that the Defence organisation has mechanisms in place to identify its internal and external stakeholders and communicate and engage with these stakeholders on Environmental Management matters.

# The Expectations in this element are:

- **E11.1** The Defence Organisation has mechanisms in place to identify internal and external stakeholders and understand their role and purpose in Environmental matters.
- **E11.2** The Defence Organisation has mechanisms in place to manage and engage with stakeholders; and to consult on Environmental matters, including with the Environmental Regulators, OGDs, suppliers, contractors and any others affected by the organisation's activities
- **E11.3** The Defence Organisation works with its stakeholders to build effective working relations to drive continual improvement in Environmental management.
- **E11.4** The Defence Organisation has mechanisms in place to allow all people including, contractors and the supply chain to easily access up to date Environmental information relevant to their roles.
- **E11.5** The Defence Organisation has clear mechanisms in place to enable all people to raise feedback on its Environmental management policies and practices, anonymously where needed.

## Documents often associated with this element:

- 1LOD assurance reports
- Agenda and minutes of the Health and Safety committee
- meetings (Strategic, Tactical and Working)
- Command / Corporate Plan
- Communications plan
- Continual Improvement (CI) logs
- Corrective action plans
- Correspondence with regulators
- Correspondence with Regulators, Other government
- departments or MoD organisations regarding Environmental concerns or knowledge sharing
- Defence organisation business plans
- Defence organisation Operating Model
- Defence organisation EMS
- Joint Basing Arrangements (JBAs)
- Memorandums of Understanding (MOUs)
- RACI (Responsible, Accountable, Consulted, Informed)
- matrix
- Service Level Agreements (SLAs)
- Whistleblowing / anonymous reporting

**Expectation 11.1** The Defence organisation has mechanisms in place to identify internal and external stakeholders and understand their role and purpose in Environmental matters.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
There is no evidence of a stakeholder management system.	<ul> <li>There are some mechanisms in place to identify internal and external stakeholders.</li> <li>Mechanisms are rarely applied to identify stakeholders' roles in Environmental matters.</li> </ul>	<ul> <li>The Defence organisation has mechanisms in place to identify its internal and external stakeholders.</li> <li>Mechanisms are regularly applied to identify stakeholders' roles in Environmental matters.</li> </ul>	The Defence organisation has mechanism in place to identify its internal and external stakeholders. There is evidence this is used to build a strong understanding of its stakeholders and their roles in Environmental matters.

**Expectation 11.2** The Defence organisation has mechanisms in place to manage and engage with stakeholders; and to consult on Environmental matters, including with the Environmental Regulators, OGDs, suppliers, contractors and others affected by the organisation's activities.

No Assurance	Limited Assurance	<b>Substantial Assurance</b>	Full Assurance
<ul> <li>The Defence organisation does not have mechanisms in place to manage and engage with stakeholders regarding consultation of Environmental matters.</li> <li>Environmental information is not communicated with other key parties (such as suppliers</li> </ul>	The Defence organisation has mechanisms in place to consult with stakeholders regarding Environmental matters, but this is typically one-way communication.	The Defence organisation has mechanisms for two-way communication on Environmental matters with its stakeholders resulting in a collaborative and proactive partnership.	The Defence organisation has mechanisms in place to gather feedback from stakeholders and those affected by the Organisation's activities regarding Environmental matters, and stakeholders are enabled to proactively share concerns.
and contractors).			The Defence organisation actively communicates with individual stakeholders and stakeholder forums and openly considers feedback to improve Environmental Management.

**Expectation 11.3** The Defence organisation works with its stakeholders to build effective working relations to drive continual improvement in Environmental Management.

### No Assurance

- The Defence organisation does not work with stakeholders to build effective working relations or drive continual improvements in Environmental Management.
- The Defence organisation does not have mechanisms to manage feedback.

## **Limited Assurance**

- The Defence organisation works with some stakeholders to build effective working relations and drive continual improvements in Environmental Management through documented processes but there are significant weaknesses in implementing Environmental Management processes across the organisation.
- The Defence organisation has mechanisms to manage feedback, however feedback is not acted upon.

# **Substantial Assurance**

- The Defence organisation works with most but not all stakeholders to build effective working relations and drives continual improvements in Environmental Management through documented processes.
- The Defence organisation has mechanisms to manage feedback and they are regularly acted upon.

# **Full Assurance**

- The Defence organisation works with all stakeholders to build effective working relations and drives continual improvements in Environmental Management through documented processes.
- The Defence organisation routinely consults with stakeholders, jointly sharing Environmental Management challenges, and working collaboratively to resolve and implement corrective actions.
- The Defence organisation seeks feedback from its stakeholders and takes action, including addressing concerns and grievances to allow them to resolve matters before they are realised.

**Expectation 11.4** The Defence organisation has mechanisms in place to allow all people, including contractors and the supply chain, to easily access up to date Environmental information relevant to their roles.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation has no mechanisms in place to allow its people, contractors, and the supply chain to easily access up to date Environmental information.	The Defence organisation has a mechanism in place to allow its people, contractors, and the supply chain to easily access Environmental information, but the information is not up to date, is incorrect or hard to access.	<ul> <li>Mechanisms are in place to provide access to Environmental information. The information is frequently reviewed and updated.</li> </ul>	<ul> <li>Mechanisms are in place to provide easy access to Environmental information.</li> <li>Systematic updates to information are undertaken and proactively shared to all stakeholders, making them aware of the changes made.</li> </ul>

**Expectation 11.5** The Defence organisation has clear mechanisms in place to enable all people to raise feedback on its Environmental Management policies and practices, anonymously where needed.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
There are no mechanisms in place to enable people to raise feedback on its Environmental Management policies and practices either directly or anonymously.	<ul> <li>Limited mechanisms are in place to raise feedback, however feedback is not considered or acted upon.</li> </ul>	<ul> <li>The Defence organisation has mechanisms in place for some people to be able to raise feedback on policies and practices, anonymously where desired.</li> <li>Feedback is often considered or acted upon.</li> </ul>	<ul> <li>People can easily raise feedback on policies and practices, anonymously where desired or required.</li> <li>There is evidence that the Defence organisation takes active steps to adjust policies and practices in response and communicate changes to those impacted.</li> </ul>

# Element 12: Assurance

# **Purpose**

This element ensures the organisation has assurance mechanisms in place to identify strengths and weaknesses in its Environmental Management system and drives continual improvement.

## The Expectations in this element are:

- **E12.1** The Defence Organisation has mechanisms in place to conduct regular risk-based 1st Line of Defence (1LOD) assurance appropriate to its scale and complexity.
- **E12.2** The Defence Organisation has mechanisms in place to enable 2LOD, 3LOD assurance and supports external assurance.
- **E12.3** The Defence organisation conducts an annual self-assessment against the elements of the Defence EMS and provides this to organisational leadership to identify opportunities for improvement and help inform the generation of the annual assurance report submission.
- **E12.4** The Defence Organisation's leadership formally review the effectiveness of their organisational EMS in meeting organisational objectives based on assurance activity undertaken.
- **E12.5** The Defence Organisation has mechanisms in place to ensure that corrective action is taken to address Defence and statutory regulator enforcements actions.

## Documents often associated with this element:

- 1LOD assurance reports
- Agenda and minutes of the relevant committee meetings
- Annual Assurance plan
- Assurance mapping and gap analysis of risk and control measures
- Audit Reports
- Command / Corporate plan
- Continual Improvement (CI) logs
- Corrective action plans and NCRs
- Defence and statutory regulator enforcement actions procedures
- Defence Organisation business plans
- Defence Organisation Operating Model
- Defence Organisation EMS
- · List of enforcement actions received

**Expectation 12.1** The Defence organisation has mechanisms in place to conduct regular risk-based 1st Line of Defence (1LOD) assurance appropriate to its scale and complexity.

No Assurance	Limited Assurance	<b>Substantial Assurance</b>	Full Assurance
not conduct 1LOD risk-based assurance activities. conducts activity, based for the 1LO non-confi	The Defence organisation conducts 1LOD assurance activity, but this is not to a risk- based formal schedule.	<ul> <li>The Defence organisation conducts 1LOD assurance activity, using a risk-based formal schedule.</li> </ul>	<ul> <li>The Defence organisation's 1LOD assurance activity identifies non-conformance, corrective actions and manages these through to resolution with a formal management and review process.</li> <li>The Defence organisation uses the findings from its 1LOD assurance activity to review and update its EMS.</li> <li>The Defence organisation routinely reviews its risk-based formal schedule and is agile in re-prioritising its assurance activity in response to emerging risks.</li> </ul>
	<ul> <li>The 1LOD assurance identifies non-conformance but does not identify corrective actions.</li> </ul>	<ul> <li>The Defence organisation has sufficient resources in place to conduct 1LOD assurance.</li> </ul>	
		<ul> <li>The 1LOD assurance identifies non-conformance and corrective actions.</li> </ul>	
		<ul> <li>The Defence organisation does not routinely review its risk- based formal schedule and is not agile in re-prioritising its assurance activity.</li> </ul>	

**Expectation 12.2** The Defence organisation has mechanisms in place to enable 2LOD, 3LOD assurance and supports external assurance.

inable to fully support the full ange of Defence 2LOD and	<ul> <li>The Defence organisation can support the full range of Defence 2LOD and 3LOD activities</li> </ul>	<ul> <li>The Defence organisation proactively seeks 2LOD and 3LOD activities including</li> </ul>
	including external assurance.	external assurance.
external assurance because of resourcing and organisational constraints.	<ul> <li>The Defence organisation does not consistently collate the findings from 2LOD, 3LOD and external assurance activities, or fully incorporates them into the management and review process.</li> </ul>	The Defence organisation routinely collates the findings from 2LOD, 3LOD and external assurance activities, and fully incorporates them into the management and review process.
<ul> <li>The Defence organisation does not understand the similarities and differences for 2LOD, 3LOD and external assurance processes, arrangements, and requirements.</li> </ul>		
	<ul> <li>The Defence organisation can demonstrate how it intends to reach full assurance.</li> </ul>	<ul> <li>The Defence organisation can demonstrate how it intends to maintain full assurance.</li> </ul>
	esourcing and organisational constraints.  the Defence organisation does not understand the similarities and differences for 2LOD, 3LOD and external assurance rocesses, arrangements, and	<ul> <li>Atternal assurance because of esourcing and organisational constraints.</li> <li>The Defence organisation does not consistently collate the findings from 2LOD, 3LOD and external assurance activities, or fully incorporates them into the management and review process.</li> <li>The Defence organisation does not consistently collate the findings from 2LOD, 3LOD and external assurance activities, or fully incorporates them into the management and review process.</li> <li>The Defence organisation does not consistently collate the findings from 2LOD, 3LOD and external assurance activities, or fully incorporates them into the management and review process.</li> <li>The Defence organisation does not consistently collate the findings from 2LOD, 3LOD and external assurance activities, or fully incorporates them into the management and review process.</li> <li>The Defence organisation does not consistently collate the findings from 2LOD, 3LOD and external assurance activities, or fully incorporates them into the management and review process.</li> </ul>

**Expectation 12.3** The Defence organisation conducts an annual self-assessment against the elements of the Defence EMS and provides this to organisational leadership to identify opportunities for improvement and help inform the generation of the annual assurance report submission.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation does not conduct an annual self-assessment against the elements of the Defence EMS to inform the annual assurance report.	The Defence organisation formally conducts an annual self- assessment against the elements of the Defence EMS.	The Defence organisation formally conducts an annual self- assessment against the elements of the Defence EMS.	The Defence organisation formally conducts an annual self- assessment against the elements of the Defence EMS.
	<ul> <li>Improvement opportunities are identified however these are not consistently implemented by leadership.</li> <li>An annual assurance report submission is produced; however, it does not provide sufficient detail in regard to the EMS</li> </ul>	<ul> <li>Improvement opportunities are identified during the self-assessment and are used by leadership to enable continual improvement.</li> <li>An annual assurance report submission is produced and provides sufficient detail relating to the EMS.</li> </ul>	<ul> <li>Improvement opportunities are identified during the self-assessment and passed onto leadership to enable continual improvement, with a formal plan for improvement and clear actions taken in response.</li> <li>Previous annual assurance report submissions are reviewed to allow for year-on-year trending of the EMS performance.</li> </ul>

**Expectation 12.4** The Defence organisation's leadership formally review the effectiveness of their organisational EMS in meeting Organisational objectives based on assurance activity undertaken.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
<ul> <li>There is no evidence that leadership is evaluating the outputs of organisational assurance.</li> <li>Leadership is not reviewing its EMS effectiveness on organisational objectives.</li> </ul>	<ul> <li>There is evidence that leadership is evaluating the outputs of organisational assurance, this is however unplanned, un-scheduled or not documented.</li> <li>Leadership reviews effectiveness of the EMS in meeting organisational objectives but is done inconsistently.</li> </ul>	<ul> <li>Leadership evaluates the outputs of organisational assurance; the process is well documented and routinely undertaken.</li> <li>Leadership regularly reviews the effectiveness of their EMS in meeting organisational objectives.</li> </ul>	Leadership promotes continual improvement in Environmental Management based on learning from formal reviews of assurance activity and the effectiveness of their EMS.

**Expectation 12.5** The Defence organisation has mechanisms in place to ensure that corrective action is taken to address Defence and statutory regulator enforcement actions.

No Assurance	Limited Assurance	Substantial Assurance	Full Assurance
The Defence organisation does not have mechanisms in place to take corrective action to address Defence and statutory regulator enforcement actions.	<ul> <li>The Defence organisation has mechanisms in place to take corrective actions to address Defence and statutory regulator enforcement actions, however this is not formally documented or consistently applied.</li> <li>Actions are not complied with within the timescale set by the regulator.</li> </ul>	<ul> <li>The Defence organisation has mechanisms in place to take corrective actions to address Defence and statutory regulator enforcement actions, and these are formally documented and consistently applied.</li> <li>Actions are complied with within the timescale set by the regulator.</li> </ul>	<ul> <li>Actions taken to comply with Defence and statutory regulator enforcement actions are shared across Defence for the benefit of organisational learning and to prevent recurrence.</li> </ul>

## **Glossary**

A glossary of key terms and acronyms used across the Defence EMS Framework.

ABC Annual Budget Cycle

ASEMS Acquisition, Safety and Environmental Management System

ALARP As Low as Reasonably Practicable

CADMID Concept, Assessment, Demonstration, Manufacture, In-service, and Disposal

CIDP Command Infrastructure Delivery Plans

CI Continual Improvement

CPD Continuing Professional Development

DCOP Defence Code of Practice

DED Disapplication, Exemption, Derogation

DURALS Defence Unified Reporting and Lessons System

EMS Environmental Management System

HS&EP Health, Safety and Environmental Protection

KPI Key Performance Indicator

LfE Learning from Experience

LOD Line of Defence (1st, 2nd, and 3rd)

MACR Major Accident Control Regulations

OSA Organisational Safety Assessments
OGD/s Other Government Department/s

PMRS Portfolio Management Reporting System

QP&RR Quarterly Performance and Risk Review

RACI Responsible, Accountable, Consulted, Informed

RIDDOR Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

SLT Senior Leadership Team

SQEP Suitably Qualified Experienced Personnel

SRO Senior Responsible Officer/Owner