



Ministry
of Defence

Element 11: Communications and Stakeholder Engagement



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Amendment record

1. This chapter has been reviewed by the Directorate of Levelling Up, Climate Change and Sustainability together with relevant subject matter experts and key environmental stakeholders. Any suggestions for amendments should be sent to:

SPO-LUCCS@mod.gov.uk

Version No	Date	Text Affected	Authority

Use of must and should

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

3. Where this chapter says should, this means that the action is not a compulsory requirement but is considered best practice to comply with the policy.

Scope

4. This policy applies to all those employed by Defence (military or civilian) as well as those working on behalf of Defence (for example, contractors). It applies to all Defence activities carried out in any location (UK or overseas).

Introduction

5. This element provides the guidance and best practice that should be followed and will assist users to comply with the expectations for communication and stakeholder engagement as set out in Element 11 of Volume 1 to JSP 816 (this JSP). This element

also aims to explain the importance of communication and stakeholder engagement which at the highest level is set out in the HS&EP Operating Model.

Purpose and expectations

6. This element focuses on the mechanisms the Defence organisation has in place to identify its internal and external stakeholders and communicate and engage with these stakeholders on matters relating to environmental management (EM).

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 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.

E11.4 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.

Identification of stakeholders

7. Stakeholder identification may differ between Defence organisations and units depending on its size and nature, supply chain and risk profile particularly where stakeholder identification is combined within a broader stakeholder management plan. Regardless of the overall approach, the following four stage approach should be common to all communications and stakeholder engagement exercises:

- a. identify.
- b. engage.
- c. consult.
- d. communicate.

Identify

8. Defence organisations should identify the stakeholders who are impacted by its activities and understand their needs and expectations. Needs and expectations can be both internal and external to the Defence organisation. This information should be used, to inform the design of their Environmental Management System (EMS), particularly the identification of environmental risks and opportunities (refer to Element 4), and their stakeholder engagement planning.

9. A stakeholder mapping exercise is a good way to consider stakeholder influence and impact, prioritise engagement and assist Organisations in developing a 'communications and engagement plan'. The plan should be reviewed and updated as appropriate and should consist of:

- a. a set of communication and engagement objectives that are agreed with key stakeholders and approved by senior leaders.
- b. a stakeholder map, identifying target stakeholders / audiences, their needs, and expectations (including information needs), and the methods / channels for communications and engagement.
- c. a description of how identified needs and expectations are addressed by the EMS.
- d. a forward plan of tactical activity to deliver against the specific objectives.
- e. a method of evaluating the impact / success of the communication and engagement activities (ideally with metrics). Any findings should be acted on to improve delivery against objectives and increase stakeholder satisfaction and participation.

10. Defence organisations should understand and fulfil their legal obligations and regulatory requirements with regards to EM stakeholder engagement and communication which should be clearly identified and understood at every level of the organisation.

Engage

11. Defence organisations should understand the influence that internal and external stakeholders have on their activities. They should establish, implement, and maintain a process for stakeholder engagement and consultation which is likely to include:

- a. providing mechanisms, time, training, and the resources necessary for consultation and participation
- b. providing timely access to clear, understandable, and relevant information about their EMS.
- c. determining and removing obstacles or barriers to participation and minimising those which cannot be removed.
- d. making all stakeholders aware of their roles with respect to communication on environmental matters.
- e. emphasising the consultation of personnel at all levels (particularly those carrying out the work activities or impacted by it):
 - (1) determining the needs and expectations of interested parties.
 - (2) understanding relevant environmental legislation, policy and regulations.
 - (3) assigning organisational roles, responsibilities, and authorities, as applicable.
 - (4) determining how to fulfil legal requirements and other requirements.
 - (5) establishing environmental objectives and planning to achieve them.
 - (6) determining applicable controls for outsourcing, procurement and contractors.

- (7) determining what needs to be monitored, measured and evaluated.
 - (8) planning, establishing, implementing, and maintaining an audit programme.
 - (9) ensuring continual improvement.
- f. emphasise the participation of the workforce in the following:
- (1) determining the mechanisms for their consultation and participation.
 - (2) identifying and assessing environmental risks and opportunities.
 - (3) determining actions to reduce environmental risks.
 - (4) determining competence requirements, training needs, training and evaluating training.
 - (5) determining what needs to be communicated and how this will be done.
 - (6) determining control measures and their effective implementation.
 - (7) investigating environmental occurrences and determining corrective actions.

12. Defence organisations should engage with the Director LUCC&S and DG DSA on specific environmental issues that may prevent the Defence organisation from complying with environmental legislation or Defence policy and regulations. Defence organisations should also consult if they identify environmental risks and issues which may have a Defence level impact.

Consult

13. Director LUCC&S uses the CC&S Steering Group and the EP Functional Delivery Group (FDG E) to consider and address pan-Defence strategic EP issues. Defence organisations should support these groups, providing suitable representatives and avoiding delegation of attendance where possible. Defence organisations should use these forums to raise awareness of the environmental risks, issues and challenges affecting their own organisation and share good practice and lessons learned to help drive continuous improvement.

14. Defence organisations should establish their own structure of committees, forums, and meetings to maintain awareness of current and potential future issues. Director LUCC&S should be invited to any organisation committee meetings, in line with the letters of delegation from the Permanent Secretary.

15. Defence organisations are consulted on all EP policy reviews and updates through the FDG E or specific policy review groups led by the Director LUCC&S. Defence organisations are to provide appropriate resources (often those with subject matter expertise) to assist with the development of new or to review and update existing environmental policy.

16. Consultation is a two-way process, so as well as making sure that EP direction and guidance is communicated to all levels of the organisation by senior leaders, Defence

organisations should encourage all personnel to raise concerns within the chain of command and to consult with others as needed.

Communicate

17. As part of the EMS, Defence organisations will be required to develop a procedure to report internally and externally on how its activities affect the environment. The procedure should define:

- a. what information needs to be communicated.
- b. when, or under what circumstances, it needs to be communicated.
- c. to whom it needs to be communicated.
- d. how it will be communicated.

18. Communication should motivate personnel to continual improvements in environmental performance and promote public understanding and acceptance of MOD activities. Effective communication should demonstrate commitment and deal with the concerns of staff and the public about issues related to the environmental aspects or the organisation's activities.

19. Internal Communications. The motivation of personnel towards proper regard for environmental concerns is vital and may be enhanced, for example, through positive recognition of good performance when environmental objectives and targets are achieved. A mechanism should be established for communicating current environmental issues to all levels and debate should be encouraged to generate ideas in order to improve site environmental performance. This can be achieved through the large range of media available for effective communication ranging from internal memos to a full-scale annual environmental report, including regular meetings, notice boards, newsletters, emails, e-newsletters, suggestion schemes etc.

20. External Communications. Regular contact should be encouraged with regulatory authorities, local authorities, and where appropriate, pressure groups and Non-Government Organisations (NGOs), using agreed communication channels (see JSP 418 on Freedom of Access to Environmental Information). A system for recording and dealing rapidly with any complaints should be established. Organisations should record their decision to communicate significant environmental aspects to the public.

Raising Health & Safety concerns

21. Defence organisations must have a process in place, to enable environmental concerns to be reported and for appropriate actions to be taken, including anonymous reporting (this is in addition to the reporting of environmental incidents set out in [JSP 375 Volume 1 Chapter 16 - Safety Occurrence Reporting and Investigation](#)). The process should have clear sequential steps to follow, until the issue is resolved or addressed at an appropriate level within the organisation's chain of command. The following steps are a good example:

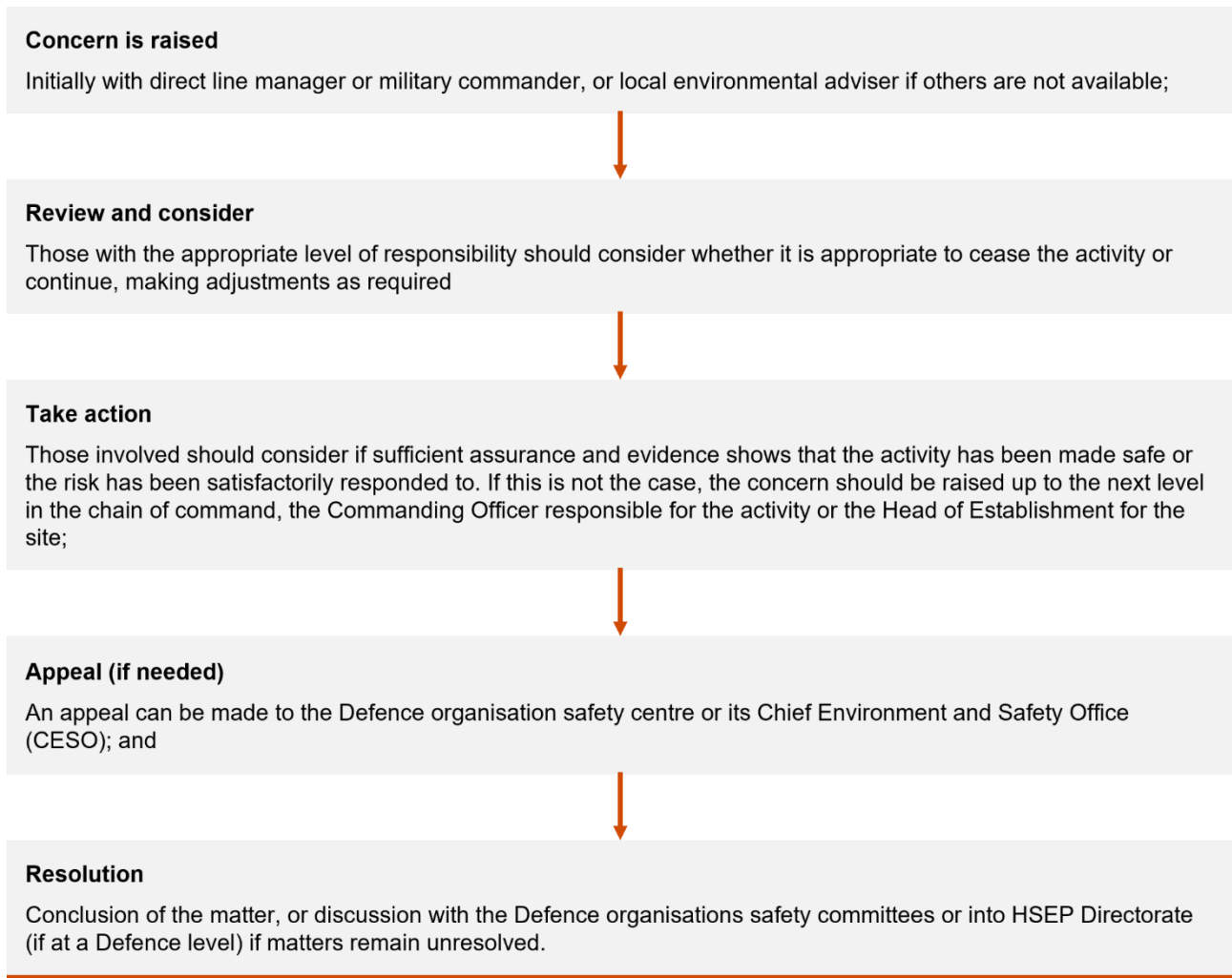


Figure 1: Raising a Health & Safety concern

22. Throughout the escalation process records should be maintained, to provide an audit trail of decision making and rationale. All decisions should be commensurate to the severity of the concern, they should be expeditious and responded to in a period of days rather than weeks.

23. Where appropriate there should be a mechanism for sharing environmental concern information internally, and with wider Defence if the issue has wider EP implications. Defence organisation leaders should make every effort to remove any obstacles or barriers (or minimise those that cannot be removed) that have been identified, which may prevent personnel raising environmental concerns.

24. If any individual feels that their concern is not being taken seriously or is not being adequately addressed, then they are able to use the MOD's whistleblowing and raising a concern process which can be found on defnet; or use the contact details which are:

- a. telephone - 0800 161 3665 (STD) or +44 1371 85 4881 (overseas).
- b. e-mail - confidential-hotline@mod.gov.uk

25. All concerns must be handled responsibly, professionally and in a positive manner. MOD will not tolerate the victimisation of anyone raising a concern, and robust action will be taken against anyone found to be responsible for such actions. Further details regarding the complaints procedures are set out in [JSP 763 - The MOD Behaviours and Informal Complaints Resolution Policy](#).

Element summary

26. Defence organisation leaders should ensure that their organisations:

- a. have mechanisms in place to identify internal and external stakeholders and understand their role and purpose in environmental matters.
- b. have mechanisms in place to manage and engage with stakeholders and to consult on environmental matters, including with the workforce, environmental regulators, suppliers, contractors, and others affected by the organisation's activities.
- c. work with its stakeholders to build effective working relations to drive continual improvement.
- d. have mechanisms in place to allow all people, contractors, and the supply chain to easily access up to date information relevant to their roles.
- e. have mechanisms in place to enable people to raise environmental-related concerns.

Plan- Do- Check- Act- (PDCA) Cycle

27. This diagram is designed to illustrate where this, and all the elements of JSP 816, fit into the PDCA cycle.

