ARMY COMMAND STANDING ORDER

NO 1200

THE ARMY'S SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM (SEMS)

ISSUED APRIL 2024

Sponsored By:

Authorised By:

Head Safety (Army)

Deputy Chief of the General Staff

Contents

RECORD OF AMENDMENTS

Change Number	Authority	Date	Amendment
0	CESO(A)	Mar 15	LFSO 3216 (Tenth Revise)
1	CESO(A)	May 18	ACSO 3216 (First Edition)
2	CS(A)	Apr 19	ACSO 3216 (First Revise)
3	CS(A)	Jan 21	ACSO 1200 (First Edition)
4	Hd Safety (A)	Apr 24	ACSO 1200 (First Revise)

1.   **Public Sector Equality Duty**. In accordance with ACSO 3252 (The Conduct and Assurance of Equality Analyses for Army Policies and Services), this ACSO 1200 – The Army Safety and Environmental Management System (SEMS) has been considered against the Public Sector Equality Duty and whilst it does impact on people it does not impact adversely on any protected characteristic group and thus an Equality Analysis Impact Assessment (EQIA) was not completed.

2.   **Public Sector Accessibility Regulations 2018**. The Army has a legal requirement to comply with the Public Sector Accessibility Regulations 2018. The regulations apply to all online content including documents (PDF, Word, PowerPoint, Excel). The owner of this ACSO 1200 – Army SEMS confirms they have performed an accessibility check of this document and that it complies with the legal requirements of the Public Sector Accessibility Regulations 2018.

3.   **Inclusive Language**. As directed by the Chief of Defence People and the Executive Committee of the Army Board (ExCo) and, all policies and services must where use inclusive language. This can usually be done by rephrasing sentences, for example by using 'they' or 'their' rather than 'his' or 'her'. The owner of ACSO 1200 – Army SEMS confirms that it complies with the MOD's inclusive language guidelines.

4.   **Maintenance of this Document and Amendments.** This document will be reviewed annually and revised as required. All hard copies of the document are uncontrolled. Amendments will be managed by the Army Safety Group - Safety Centre, Army HQ, Blenheim Building, Marlborough Lines, Monxton Road, Andover, Hampshire SP11 8HT.

Preface

References:

A.   [JSP 375 Management of Health and Safety in Defence](#).
B.   [JSP 376 Defence Acquisition Safety Policy](#)
C.   [JSP 418 Management of Environmental Protection in Defence](#).
D.   [JSP 426 Defence Fire Safety & Risk Management Policy, Guidance, and Information](#).
E.   [JSP 815 Defence Safety Management System](#).
F.   [JSP 816 Defence Environmental Management System](#).

Aim

1.   This Army Command Standing Order (ACSO) sets out the Safety and Environmental Management System (SEMS), including Fire Safety Management (FSM), across the Army in line with the Secretary of State for Defence Policy Statement on Health, Safety and Environmental Protection.

Scope

2.   The SEMS regime is directed by the Deputy Chief of the General Staff (DCGS) - the Army Safety Champion, through the Executive Committee of the Army Board (ECAB). It creates the conditions to deliver the Army's legal obligations whilst nurturing the Army's safety culture and sustaining the Army's Duty of Care (DoC) responsibilities. It is about making Mission Command work in peacetime and to remove centralisation, over assurance and bureaucracy which stifles the CoC's ability to delegate and empower subordinate levels. Thus ensuring the Chain of Command (CoC) is not stifled in its ability to empower and delegate by allowing Commanders to manage risk according to context learning and learn from genuine errors; whilst not accepting recklessness and/or negligence.

Structure

3.   This ACSO is in 4 sections in accordance HSG 65 broken down into chapters with, where appropriate, using the Defence two-part approach of:

a.   Part 1. Direction – **MUST**; an activity that is mandatory.

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

Legislation

4.   UK Common Law obligations under the law of negligence apply; the key point being that the DoC to ensure a safe working environment continues throughout and applies to all activities including the employment of personnel, training, and equipment. The Army must not breach this DoC. This duty includes ensuring that the working environment, so far as reasonably practicable, is safe.

5.   The Health and Safety at Work Act 1974 (HSWA) sets out the overarching duty upon employers to ensure, as far as reasonably practicable, the health, safety, and welfare at work of all their employees and those visiting their premises[1]. Health and Safety statutory obligations and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) contain specific legal obligations which must be complied with.

6.   The Management of Health and Safety at Work Regulations 1999 (MHSWR 99) and The Control of Substances Hazardous to Health Regulations 2002 (COSHH) contain further detail and mandate risk assessments and precautions to eliminate or adequately control the risks.

7.   In the UK, the primary piece of environmental protection legislation is the Environmental Act (EA) (2021). The EA21 defines within England, Scotland, and Wales the legal framework for DoC for waste, contaminated land, and statutory nuisance. One of the principal regulations in England and Wales is the Environmental Permitting Regulations (EPR) (2016). EPR provides a consolidated framework for environmental permits and exemptions covering industrial activities, waste operations and water discharge activities amongst others. EPR also sets out the powers, functions, and duties of the regulators. In Scotland and Northern Ireland the Principal permitting regulations are the Pollution Prevention and Control (PPC) Regulations.

8.   The Regulatory Reform (Fire Safety) Order 2005 (RRO)[2] stipulates that any person who has some level of control in premises must take all reasonable steps to reduce the risk from fire and make sure people can escape if there is fire, and also mandates fire risk assessments and precautions to eliminate or reduce the risk from fire as far as is reasonably practicable.

Applicability

9.   The Army SEMS is intended to identify and mitigate risk while sharing good practice as part of the Army's continuous improvement and is applicable to all Army Commands, Formations, Units and establishments.

10.   **Coherence with other Army policies and guidance**. It also applies to Force Protection (Safety, Health, Environmental Protection, Fire) (FP (SHEF)) delivered by the Army to other TLBs and has been written to align with the Directorate of Defence Safety (DDS) as per Refs A - F and Defence Regulations issued by the Defence Safety Authority (DSA) as well as International Organisation for Standardisation (ISO)[3]. Where applicable, this document contains links to other relevant ACSOs, some of which may be published by different staff branches including legal and professional enforcement ie Service Discipline (AFA 06). Where dependencies exist, these other staff branches have been consulted in the formulation of the policy and guidance detailed in this publication.

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[1] The general duties of HSWA are employers have towards employees and members of the public, employees have to themselves and to each other and certain self-employed have towards themselves and others.
[2] And equivalent Fire Legislation in devolved administrations.
[3] The ISO family of Quality Management System's standards is designed to help organisations meet the needs of customers and other stakeholders and regulatory requirements related to a product e.g. ISO 45001.

11.   **Joint Services activities**. This ACSO is Army policy, therefore, in Joint Service units, RN and RAF personnel can only take part in an event/activity if they are under the command of the Army 2*/1* HQ or Army CO authorising the event/activity and as such it becomes the Army OPCOM CoC who retains accountability and responsibility for the safe planning and delivery of the task and retains the DoC for all participants. Where Army personnel are authorised to participate in an activity being planned and delivered under another Single Service (sS) it is the other sS that retains accountability and responsibility for the safe planning and conduct of the task, but the Army CoC retains a DoC as the providing CoC as outlined in Ch. 4.

12.   **Training Standards**. RN and RAF personnel under OPCOM, OPCON, or ADCON will conform to their Single Service training standards. The CoC is to be notified if any deficiencies are identified or if other Service standards conflict or are at odds with those of the Army. The matter is to be referred to Head Safety (Army) (Hd Safety (A)) if necessary.

Responsibilities

13.   **CoC and Line Managers**. The CoC and all Line Managers are responsible for providing a Safe System of Work (SSW) and must understand these obligations, continue to assess the risks dynamically, demonstrate good judgement and reasonable decision making, record their decisions and report any occurrences[4]. These requirements are fulfilled by reducing the risks to "As Low as Reasonably Practicable" (ALARP) and Tolerable through ensuring that the MOD and Army policies[5] and guidance on reducing the risks are adhered to. The mechanism to do this is a formal and recorded risk assessment in accordance with doctrine (JSP 375). All confirmed or suspected breaches of the law and regulations are to be reported as required by policy. In certain instances this may include RIDDOR which is undertaken by the Army Reporting Cell (ARC).

14.   **Engagement with another MOD TLB**. The principal officer authorised to directly liaise over all SHEF matters is Hd Safety (A) including other Front-Line Commands (FLCs) – RN, RAF, and UK Strat Com, Enabling Organisations (EOs)[6] or Head Office such as Directorate Defence Safety (DDS) or LUCCS (Levelling Up, the Union, Climate Change and Sustainability). Less for maritime matters which is the purview of the Chief Maritime Officer (Army) (CMO(A)).

15.   **Engagement with the Health and Safety Executive (HSE), the Environment Agency (EA) and other Government Departments**. There are occasions when the Army is required to engage with statutory bodies such as the HSE and EA and Other Government Departments (OGD). The principal point of contact is through the Army Safety Group - Safety Centre (ASG-SC). ASCen-Mailbox (MULTIUSER) ASCen-Mailbox@mod.gov.uk.

16.   **Point of Contact**. The PoC for this document is the ASG-SC; ASCen-Mailbox (MULTIUSER) ASCen-Mailbox@mod.gov.uk.

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[4] Occurrence - is defined as any safety-related event which endangers or, if not corrected or addressed, could endanger people, equipment, infrastructure, environment, the active participants, bystanders, or any other person. It includes accidents, incidents, work related illness, dangerous occurrence, fire, environmental incidents and near misses.
[5] Both elements subscribing to HSE and EA good practice.
[6] This includes the DSA.

Safety and Environmental Protection in the Army

Statement of Intent
by the Chief of the General Staff

The British Army must have a strong safety culture. Unnecessary harm to our people and our environment is negligent, a failure of leadership and prevents us from meeting our moral and legal obligations to both the nation and our employees. There is simply no place in the British Army for a reckless or cavalier approach to safety.

Trust and leadership are the bedrock on which our attitude to safety must be founded. The Army requires a culture of continuous improvement that demonstrates that our people will be commended for their honesty and desire to improve, rather than penalised for it. All commanders must lead by example, encourage the right behaviour, and be fair and measured in their judgement. We must also be rapid in exploiting the lessons from our mistakes and near-misses.

A mature and professional safety culture should be empowering; it should seek freedoms rather than imposing constraints. Our training must be as realistic as possible and our lives in camp should be unencumbered and free – safe in the knowledge that the welfare of our people is at the heart of all decision making.

The true mark of success will be when this is second nature: where our people are proactively improving procedures in advance of any incident rather than in response to one; where they are able to balance risk and safety accurately and instinctively in their decision making; and where safety is a team sport.

General Sir Patrick Sanders KCB CBE DSO ADC Gen

CGS

1 Oct 22

Army Command Standing Order No 1200

The Army's Safety and Environmental Management System

Foreword

Additional references:

A.   HSE HSG 65 – Managing for Health and Safety.
B.   20180423-A Review of the Army's Safety, Lessons, Organisational Learning and Assurance Mechanisms.
C.   ARMYEXCO/P (18)023, dated 15 Nov 18.

Requirement

1.   The Army is required by UK law and Defence policy to minimise work-related fatalities, injuries, ill-health, and adverse effects on the environment from its activity. More than just a legal responsibility, this also enhances the physical and moral components of Fighting Power. To deliver this effectively and consistently it requires leadership[7] at its core with all Army personnel, irrespective of rank, have legal responsibilities under the HSWA to provide a DoC to subordinates, each other and those who may be affected by their acts or omissions. The Army delivers its Safety commitments in conjunction with Environmental Protection[8]. The Army SEMS methodology is based on HSG 65 – Plan, Do, Check, Act[9] delivered via FP (SHEF) using a disaggregated approach.

Context

2.   Health and Safety at Work is regulated by the Health and Safety Executive (HSE) and environmental matters are regulated by the EA (or their equivalents in Scotland, Wales, and Northern Ireland) while the Secretary of State for Defence (SoS) is the AP with ultimate responsibility for Health, Safety and Environmental Protection in Defence. The HSE recommends an approach to safety as set out in additional Ref A based on a Plan, Do, Check, Act cycle achieving a balance between behavioural aspects and systems encouraging the integration of safety management with organisational management. It encourages approaching Health and Safety management as an integral part of good management and leadership, rather than as a stand-alone system. Widely used as an industry standard, it can be adapted to the full spectrum of Army activity.

3.   The SoS has appointed the 2nd Permanent Under Secretary (2PUS) as the Department's most senior official for HS&E[10] responsible for ensuring that effective management arrangements are in place to achieve compliance with SoS's Policy Statement. 2PUS is supported in this duty by DDS (Safety and Fire) and LUCCS[11] (EP) for policy and guidance and the DSA for regulation and who will also investigate HS&EP where there is a Departmental responsibility. The term Safety and Environmental Management System (SEMS) is used by Defence to describe the systematic approach

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[7] Army Leadership Code
[8] It should be noted that Army Health and Wellbeing have responsibility for Environmental and Occupational Health (ACSO 3215).
[9] HSG65 - Managing for Health and Safety.
[10] Health & Safety and Environment.
[11] Levelling Up, Climate Change and Sustainability (LUCCS) Directorate.

that will be implemented through FP (SHEF) management and the collection of specific arrangements that underpin this implementation. The model is shown graphically in Fig 1 and is the framework for the Army's SEMS.

Defence Safety Leadership Principles

4.   The following Safety Leadership Principles should guide how leaders act on safety:

a.   Relentlessly pursue our vision of a fatality free working environment.

b.   Value safety as an equal partner to other priorities, and an enhancer of military capability.

c.   Actively encourage open and transparent reporting – especially of near misses.

d.   Shape how those below me act on safety by the way I speak and act on safety.

e.   Seek feedback on my own and my senior team's individual safety leadership behaviours.

Figure 1. HSG 65 model

Commander's Responsibilities

5. Commanders and Leaders must:

a. **PLAN:**

(1) Identify and communicate what is to be achieved in terms of FP (SHEF), who will be responsible for what, how aims will be achieved and how success will be measured. Capturing this in a policy and having a plan to deliver it will reduce ambiguity and ensure intent is clear.

(2) Consider fire and other emergencies. Co-operate with anyone who shares the workplace and ensure plans are co-ordinated.

(3) Plan for changes and identify any specific requirements that apply.

(4) Produce Risk Registers[12] that identify priorities, focus resources, allocate and record Responsibility, Accountability and Authority (RA2) and track risk controls.

b. **DO:**

(1) Identify the FP (SHEF) risks in their AoR and establish safety management systems, processes, and governance frameworks to manage them to ALARP and Tolerable[13] ensuring an SSW is in place.

(2) Where occupancy and/or activity is shared, such as with Cadets, other units, contractors, etc, the other user(s) must attend the safety meetings. The '4Cs' principle[14] applies and Risk Assessments must account for all user groups.

c. **CHECK:**

(1) Decide how performance will be measured in the AoR. Consider ways to do this that go beyond looking at accident figures – looking at leading as well as lagging indicators. These are also called <u>active and reactive indicators</u>.

(2) Establish mechanisms to measure FP (SHEF) performance by analysing leading and lagging indicators[15], as shown in Table 1 (not exhaustive):

(3) Leading indicators are a form of active monitoring focused on a few critical risk control systems to ensure their continued effectiveness. Leading indicators require a routine systematic check that key actions or activities are undertaken as intended.

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[12] Risk registers should be completed, recorded, and maintained with the preferred template in the Army Force Protection (SHEF) Framework available on the Army Safety DC Page.
[13] ALARP in a Service context DALS has interpreted the test in the military context as, "Do the measures identified to mitigate the risk have a grossly disproportionate impact on Operational Effectiveness and Defence outputs compared to the likelihood of the risk occurring?".
[14] JSP375 Vol 1 Chap 34.
[15] HSE Developing process safety indicators.

(4) Lagging indicators are a form of reactive monitoring requiring the reporting and investigation of specific incidents and events to discover weaknesses in that system. These incidents or events do not have to result in major damage or injury or even a loss of containment, providing that they represent a failure of a significant control system which guards against or limits the impact of a major incident.

Ser	Leading Indicators	Ser	Lagging Indicators
1	Publication of FP (SHEF) plans.	1	Observations made by personnel (e.g. challenges)
2	Sufficient trained and experienced personnel in supervisory posts.	2	Major occurrences and fatalities
3	Appointment of staff leads and 'Safety Champions'.	3	Sickness and injury-related absences
4	Frequency and effectiveness of FP (SHEF) committee meetings.	4	Unsafe acts and conditions reported (including near misses)
5	Personal protective equipment usage (e.g. ear defence).	5	Observations from assurance activity
6	Quality of Safety and/or Environmental Risk Assessments signed off (dual signature).	6	Observations made by regulators (e.g. Enforcement Notifications)
7	Frequency and effectiveness of FP (SHEF) assurance activity.		
8	Numbers of FP (SHEF) trained staff.		
9	Number and quality of risk profiles, assessments, and Organisational Safety Assessments (OSAs)[1].		
10	Extent to which plans, and objectives have been set and achieved.		
11	Extent of compliance with risk controls (e.g. sufficient personnel, induction briefings, etc).		
12	Extent of compliance with statutory and regulatory requirements.		

Table 1: 1LOD Performance Assessment Leading and Lagging Indicators

d. **ACT:**

(1)   Conduct Organisation Learning (OL). Identify and embed OL across the force at the appropriate level.

(2)   Collaboration. Good Safety Management relies on mechanisms being established to facilitate regular consultation and cooperation on Safety issues. Chains of Command **must** ensure such forums exist at levels commensurate with the nature of risk and chaired by Commanders (OC, CO, HoE, Comdt, Comd, etc). In addition to programmed FP (SHEF) meetings, Commanders should include FP (SHEF) 'risk' meetings prior to and after a major event – an 'After-Action Review' such as an exercise or complex road move, in order to ensure that risks are/were identified, effectively managed, lessons learnt and communicated effectively.

(3)   Continuous Improvement. Strive for continuous improvement by developing and driving their Continuous Improvement plan.

(4)   Communicate. Communications both horizontal and lateral with views from the 'coal face' and from SMEs are vital to ensuring that maximum benefit is derived from the lived experience. Everyone should be aware and participate in the Commander's intent. Ideally, every opportunity should contain a FP (SHEF) thread be that as a standing agenda item, a safety moment or encouraging individuals to use the Army's FP (SHEF) training and education offering.

Introduction
Safety Culture

Additional references:

A.   [Defence Safety Authority 01.1 - Regulations](#).
B.   [Values and Standards of the British Army](#).
C.   [Army Leadership Code](#).

Figure 2. Supporting Cultures – Safety

1.   Culture is best understood as '*the way we do things around here*'[16]. Culture forms the context within which people judge the appropriateness of their behaviour with the Army's organisational culture based on its Values and Standards underpinned by its Leadership Code. This is supported by 3 sub-cultures: behaviours, safety, and security. An organisation's culture will influence human behaviour and human performance at work. Historically, poor safety culture has contributed to major occurrences and personal injuries with the Army facing an arguably unique challenge. It is required to demonstrate a legal responsibility to its people, comply with the law, minimise avoidable losses and promote a strong safety culture. At the same time, it must retain its warfighting ethos of boldness, initiative and calculated risk taking that can often be decisive on operations.

2.   A key activity in improving safety subculture is to understand what culture an organisation currently has and what sort of safety culture it wants. The components of a healthy safety culture are well recognised with Reason's[17] original four sub-cultures of just, flexible, learning and reporting complemented by Haddon-Cave[18] adding a 5th sub-culture - questioning. These are captured in additional Ref A - C and summarised for simplicity at Fig 2.

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[16] Organisational Culture – HSE; https://www.hse.gov.uk/humanfactors/topics/culture.htm.
[17] Reason, J (2000) Human error: models and management BMJ 18 Mar 00 Vol. 320 pp. 768-770.
[18] Haddon-Cave QC, C (2009) The Nimrod Review, published 1 Oct 09.

3.   The key to resolving the dilemma is sound judgement; understanding when it is desirable to take additional risks in order to achieve a successful outcome as the gains outweigh the potential cost, and when it is prudent to take a more measured approach to safety risk as the gains are not worth the potential cost. The safety of personnel is both a leadership and management responsibility that has its roots in legislation; we are breaking the law if we do not manage risk correctly. It may, at times, feel counter-cultural to insist on good safety behaviour in barracks, on the training area or when conducting adventurous training or sport when mindful of the extreme hazards that Army personnel may face, or have recently faced, on combat operations. However, it must be recognised that safety is a **FP** measure acting as an **Enabler** to support and deliver **Operational Effectiveness**. Therefore, strong leadership is required in developing a mindset of safety with an insistence on good behaviour – to permit poor behaviour is to promote it.

4.   Generating a strong culture is not something that can be fixed in a defined period and then just put aside; it is a journey, not a destination. It is likely the Army has evidence of behaviour from every part of the safety culture spectrum shown below at Fig 3 which identifies the major steps of any cultural improvement journey. The challenge is to move more behaviour up the steps away from the Pathological and towards the Generative.
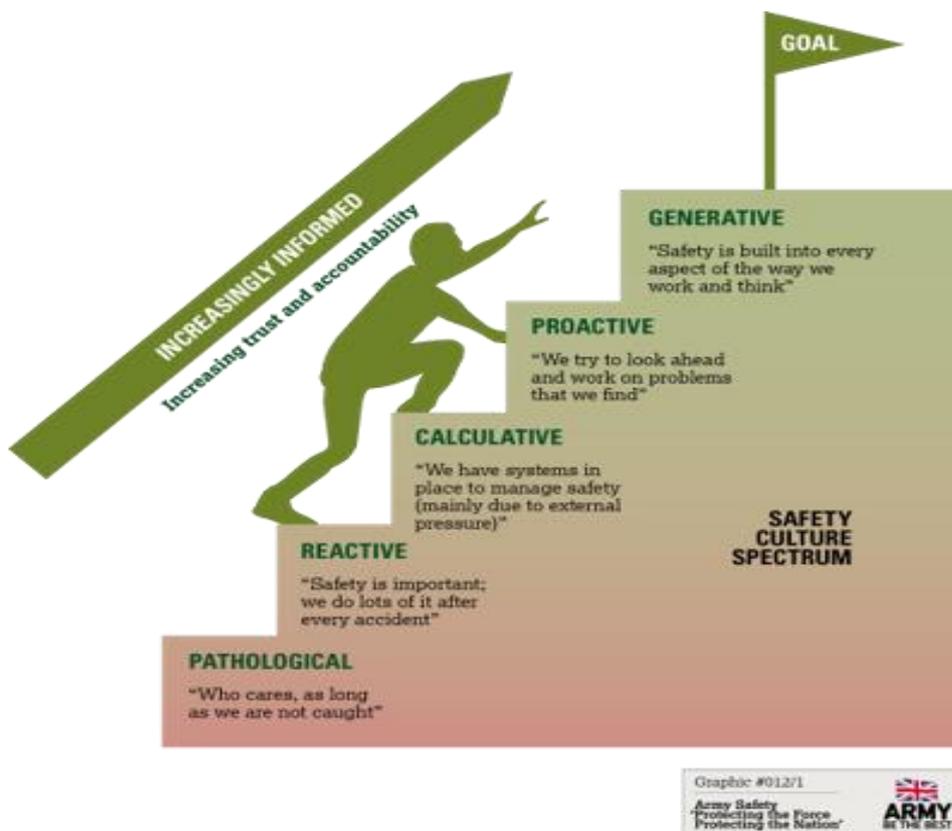

Figure 3. Safety Culture Spectrum

5.   A just system recognises and rewards good behaviour which must be recognised even whilst dealing with poor or reckless behaviour. To aide this determination, it is important to understand the causal factors of why an occurrence happened or is

happening. An understanding of these factors enables the application of a Just System thereby engendering mutual trust and the strengthening of a safety culture with a supporting flowchart at Fig 4.
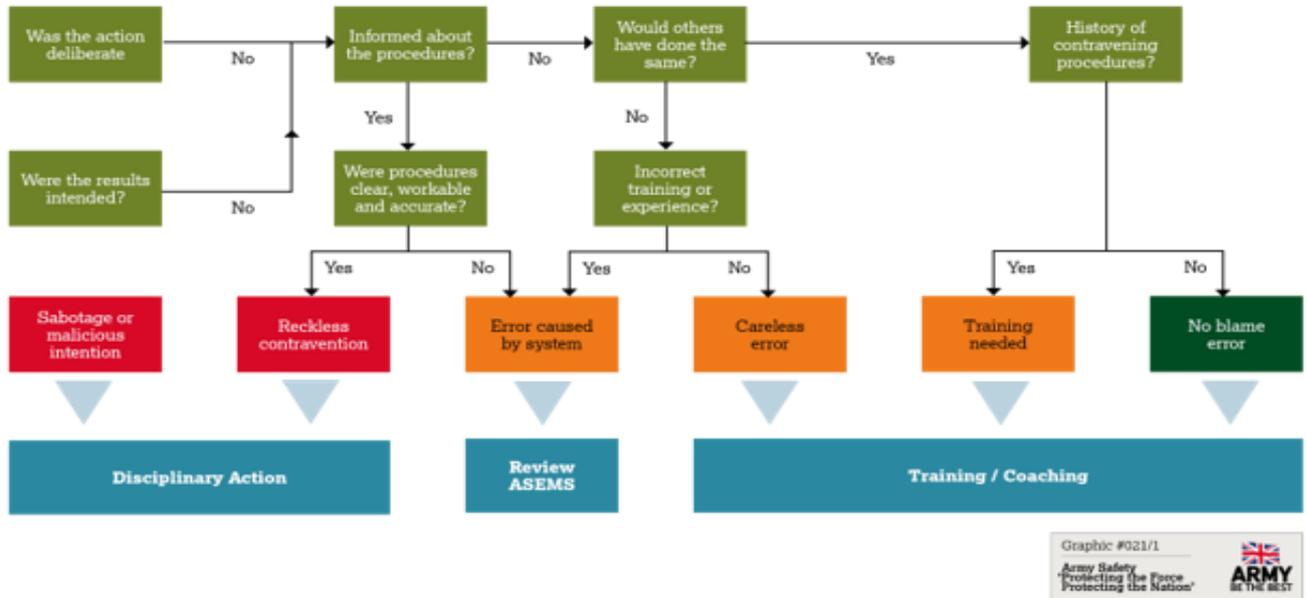

Figure 4. Just System

6.   The Flow Chart Analysis of Investigation Results (FAIR) System provides the decision-making flowchart to steer Commanders thorough a judgment of culpability at Fig 5.
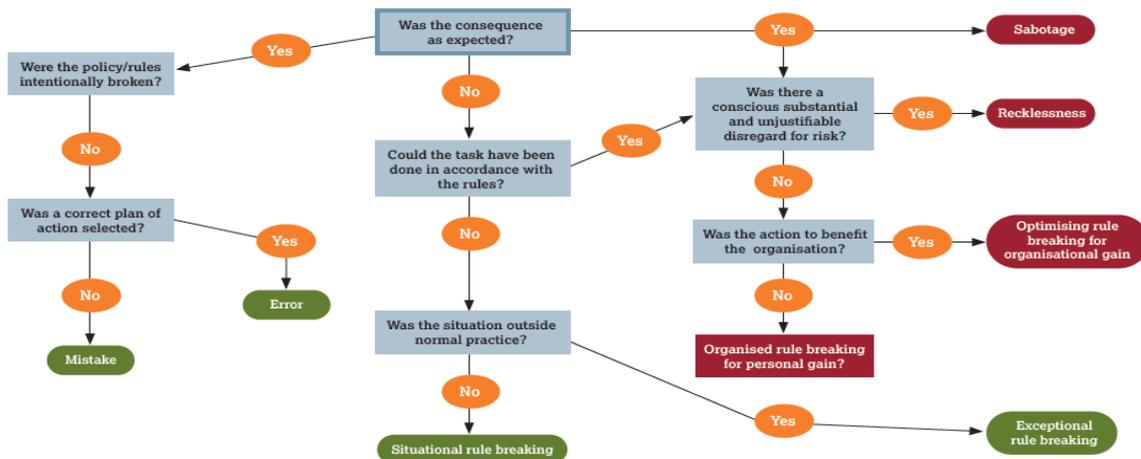

Figure 5. Flowchart Analysis of Investigation Results (FAIR)

7.   A key component to enable the journey up the steps in any organisation is a Just Culture. In terms of taking the academic and analytical a template for commanders / managers on how they can develop and improve safety culture to assist with 1st Line of Defence (1LOD) cultural assessments is at Table 2:

A healthy safety culture is where there is:	This is shown when Commanders:	And is helped when Commanders:
Visible commitment to Safety by the CoC	Make regular useful visits to units and establishments. Discuss safety matters with all Ranks. Commits resources to Safety, including Safety Workshops and audits. Does not tolerate violations of procedures	Demonstrate commitment. Actively set an example in conforming to Safety procedures Make time to visit units and establishments (not just after an accident)
Participation at all levels and ownership of Safety problems and solutions	Consult widely about Health and Safety matters. Do more than the minimum to comply with the law. Seek all rank participation in setting objectives and investigating occurrences	Lead and support active Health and Safety (EP and Fire) committees. Have a positive attitude toward safety staff and concepts. Provide the means and encouragement for an all-informed approach to Safety where everyone feels they can speak up without fear of reprisals
Trust between Commanders and the commanded	Respects the health and safety of personnel. Show good judgement when balancing risk and task needs. Encourage others to raise any concerns they have	Establish a Just safety culture that recognises good behaviour and assigns blame only when someone has clearly been reckless (FAIR) Act on concerns raised, justifying their response if necessary
Good communications	Provide clear, concise, and relevant Safety policy, guidance, and information. Regularly communicate with their personnel, listening to and acting on feedback	Communicate the Safety message via a number of means. Actively seek feedback
A competent workforce	Ensure and maintain an SSW. Ensure that personnel are trained for the tasks they are asked to conduct.	Conduct proper assurance. Check on training requirements. Ensure personnel are current on the tactics, techniques

	Ensure that, where appropriate, an effective supervisory regime is in place	(tools and equipment) and procedures (TTPs) they will be expected to use

Table 2. Commander's Cultural Continuous Improvement Approach

8.   Duties of an Employee[19]. One of the ways that employees can fulfil their individual responsibilities is through bystander intervention. A bystander being is anyone who witnesses or becomes aware of behaviour that warrants comment or action. Bystanders can provide favourable feedback or praise in response to positive acts and redirect or de-escalate negative acts. Bystander intervention is an effective, proactive strategy in the prevention and de-escalation of crises. Bystanders can improve the organisation's climate by increasing job satisfaction and unit morale.

9.   The bystander effect is a psychological phenomenon where persons are less likely to intervene in a situation that warrants comment or action when others are present than when they are alone. On the contrary, diffusion of responsibility tends to occur in groups where responsibility is not explicitly assigned and consequently, events are allowed to occur that otherwise may have been de-escalated or stopped if bystanders were alone.

10.   Bystander intervention is assessing a situation to determine what kind of intervention, if any, might be appropriate. The Bystander Approach:

  a.   Shifts responsibility to community.

  b.   Encourages Service Member involvement.

  c.   Discourages victim blaming.

  d.   Is an opportunity to change the culture and social norms of the Army.

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[19] HSWA 74, Sect 7 - Duties of an Employee.

SECTION 1 – PLAN

Additional references.

A.   JSP 375 Master Glossary.
B.   JSP 815 Vol 2 Element 5.
C.   JSP 376: Defence Acquisition Safety Policy.
D.   ACSO 1201 – Land Equipment Safety Management Instruction.
E.   ACSO 9017 – Force Health Protection Audit (FHPA).

Introduction

1.   This Chapter is intended to assist Commanders to manage the balance between the safety risks faced and potential benefits that may accrue. Commanders must integrate risk management into their planning and estimates ensuring that controls are in place to ensure risks are managed to ALARP and Tolerable. This obligation is universal (applied to all activities), and responsibility is vested in every individual from recruit to CGS. However, more is expected of Commanders (from LCpl upwards) who direct and supervise activity to manage the risks they create and/or are confronted by. This is done by understanding the risks, making a judgement on whether the risk (potential adverse outcome) is worth the potential benefit and putting controls in place to reduce the risks to ALARP and Tolerable.

Chapter 1

The Organisation and Arrangements for the Management of Safety, Environmental Protection and Fire Safety in the Army

Introduction

2.   Defence has committed to applying UK standards where reasonably practicable and, in addition, respond to host nations' relevant health and safety expectations. Therefore, the Army must implement a SEMS that is proportionate to the risks and hazards faced – the greater or more complex the risk, the more sophisticated the system required to manage it. It is essential that the Army has a full understanding of the risks it faces in order that their management is appropriate, coherent, and proportionate with the Army's culture, ethos, and requirement to deliver operational capability. Striking the right balance requires sound judgement and a strong, informed and 'Just' safety culture. The safety of personnel and the protection of the environment are intrinsically linked to the Army's operational effectiveness, business objectives and FP. The Army operates a disaggregated approach to the delivery of its DoC responsibilities through FP (SHEF) of which the principal organisation is the ASG-SC which acts as the coordinating authority on behalf DCGS – the Army Safety Champion.

3.   Accountable Person (AP). Additional Ref A defines the term Accountable Person (AP) as 'The person whose terms of reference state that they are responsible for making sure there are suitable and sufficient systems in place to control health and safety risks in

their unit, estate (site) or platform. In reducing or removing the risk of harm to people, equipment or the environment, an AP must comply with legislation, regulation, and policy'. This term is used in place of CO, HoE, OC, Station Commander and so on, or as decreed by the Defence organisations.

    a.   In the Army, an AP is identified as being a 3* Strategic HQ Head, 2* Directorate Head, or 1* Functional enabler (akin to head of a business unit). An AP is responsible for producing and owning a Safety and Environmental Management Plan (SEMP) for their AoR.

    b.   The AP is expected to ensure an appropriate plan, including organisation and arrangements, exists to control HS&EP risks in their area of responsibility and can justify their actions or decisions to their seniors, regulators and higher if necessary[20].

    c.   To support the decision-making process, each AP should nominate an SME to support the risk assessment process (see Ch 3), e.g., a Senior Operator (SO) or technical Subject Matter Expert (SME). The SO should be experienced with operations with the specific AoR.

    d.   The AP is authorised to appoint subordinate APs at the 1*/OF5/B1/B2 level within their CoC, where deemed necessary to manage specific areas of FP (SHEF), e.g., Chief Maritime Officer (Army), Chief Engineer (Army), Chief Aircraft Engineer (Army), Inspector Explosives (Army), Chief Ammunition Technical Officer etc. COs and HoEs are also to be authorised APs by appointment[21].

4.   Organisational Safety Role Definitions:

    a.   Safety Critical. A safety critical position exists where the incumbent is the controlling mind who is required to make safety decisions, for which this person is accountable, and without which the delivery of the capability or output would not be possible, e.g., an AP or Duty Holder (DH). The definition extends to specifically nominated specialist Advisors to the AP or DH such as Senior Operators or Chief Engineers as well as DCGS and Hd Safety (A).

    b.   Safety Enabling. A safety enabling position exists where the incumbent is responsible for provision of direct SME advice or assurance to a safety critical post holder. This definition would include positions such as a technical SME or DH staff officer and include key members of safety focussed organisations such as the ASG, Army Commands and Unit/Establishment FP (SHEF) personnel.

    c.   Safety Related. A safety related post exists where the incumbent acts in a supporting safety role to provide general FP (SHEF) advice.

5.   Competence. Competence is a vital element of FP (SHEF). It is achieved by ensuring that all personnel, commensurate with the task, are qualified and current, and that they are appropriately supervised. The ASG-SC acts as the Army Professional Standards Authority (APSA) for all of the Army's Functional Safety Training and through Army

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[20] Definition of Accountable Person is contained in JSP815_Vol2_Element5.pdf (sharepoint.com).
[21] Contained with the Assignment order.

Force Protection Advisors (AFPAs) using an 'on demand at the point of need' principle, whilst Education remains at designated Defence colleges and schools.

Part 1

6.   CGS. CGS is responsible and accountable to SofS for conducting Defence activities in their Area of Responsibility (AoR) in a way that is safe, environmentally responsible, and compliant with MOD regulation[22]. CGS is responsible for the Safety of all the Army's personnel and sets the standard for the Army SEMS. CGS is the most senior role within the Army whose principal tasks include:

a.   Meet all legislation, regulation, and policy in a systematic and reliable manner to promote continuous improvement.

b.   Be appointed the SDH for Army activity that gives rise to a Known Activity Risks requiring enhanced safety management arrangements.

c.   Lead the TLB Duty Holding system as the SDH and write to all ODHs with Letters of Appointment[23].

d.   Chair the Army Health, Safety and Environment Committee (AHSEC) and when not available delegate this responsibility to the DCGS and Hd Safety (A).

e.   Use the Army Operating Model (AOM) governance system to ensure that FP (SHEF) risks are adequately controlled, and Army activity is sufficiently resilient to safety failures.

f.   Review key performance indicators (KPIs) or metrics to ensure that the Army SEMS is performing to the required standard.

g.   Attend the Defence Safety and Environmental Committee (DSEC), as chaired by the Second Permanent Secretary.

7.   DCGS. DCGS is the Army Safety Champion as the Senior Safety Manager (SSM) to CGS who is the overall Safety Owner as Head of the Army TLB. The post holder provides direction and guidance on the requirements of the Army SEMS and ensures they are being implemented effectively. The SSM is also responsible for delivery of the Army Safety and Environment Improvement Plan (ASEIP). DCGS operates within a safety-critical position and as part of their duties, they shall:

a.   Provide direction and guidance on the Army SEMS including FP (SHEF) management arrangements and ensure they are being implemented effectively.

b.   Ensure the resilience of FP (SHEF) activities across the Army; through compliance and appropriate risk controls that are enacted effectively.

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[22] See JSP375_Directive_and_Guidance.pdf (sharepoint.com).
[23] SDH appointment letters are supplied by the ASG-SC.

c.   Be the Senior Responsible Owner (SRO) for the ASEIP.

d.   As owner of the SEMS, be responsible for an EP management system that underpins CGS's Environmental Protection Statement and direct the boundary of environmental responsibility between the AHSEC and the Climate Change and Sustainability Steering Group.

e.   Develop and manage a system to implement EP requirements across the TLB and to ensure that APs are competent and have the necessary resources to:

(1)   Minimise adverse effects on the environment.

(2)   Report/analyse environmental occurrences from Army activities.

f.   Chair the AHSEC in the absence of CGS.

g.   Review the findings summarised by 2LOD.

h.   Review assurance reports submitted by the DSA and Statutory Regulators.

i.   Be responsible for ensuring the effective and efficient operation of records management procedures across the TLB including:

(1)   Safe retention of records for as long as they are required.

(2)   Transfer of records to long-term storage.

(3)   Timely destruction of records no longer required.

(4)   Maintaining an effective and demonstrable system to retain records as described in JSP 441.

j.   Attend the supporting Defence Safety and Environmental Committee (DSEC) Functional Steering Group.

k.   Initiate a non-statutory Army Safety Investigation where an external investigation is not undertaken by the DSA, the conditions for a Service Inquiry have not been met, and an Army level investigation would be beneficial. DCGS may also direct an ACAI to analyse any Army-wide HS&EP trends.

Army HQ

8.   Army Strategic Centre (StratCen). StratCen sets and aligns the Army's Ends, Ways and Means. It does this by directing Army activity, orchestrating the development, and setting of Army strategy with a strategy-led Balance of Investment (BoI) process and by producing the Army Command Plan (ACP) to organise and direct implementation of strategy. Principal tasks are:

a. Develop the Army's strategy.

b. Directs the organisation to deliver its ASEIP.

c. Coheres and assures the Army Programme of Record.

d. Directs and orchestrates the Army's institutional and international communications and engagement.

e. Initiates Army structural change through using the Structural Change Working Group (SCWG), implementation order including endorsement of Organisational Safety Assessments (OSA).

9. Army HQ 2* Directorates. 2* Directorates have RA2 for safety-related activity and policy in their respective areas which are aligned to their function in the AOM. They are to familiarise themselves with their responsibilities, authorities and accountabilities and ensure a suitable and sufficient governance framework exists to meet those obligations. This will include but is not limited to defining safe practice and procedures providing subject matter expert advice to the CoC and DHs, highlighting infrastructure safety risks (including fire and fuel and gas installations) and the means to control such risks as outlined in Chap 4.

10. Futures Directorate (D Futures). D Futures helps the Army win by operating as an engine for research, analysis, and experimentation, setting the aiming mark and driving change. This includes the Army's Maritime capability:

a. Maritime Operations.

b. Littoral Operations.

c. Riverine Operations.

d. Army Diving.

e. Port Operations.

11. Maritime Equipment is sponsored by the Royal Navy and delivered as 'Safe to Operate' by DE&S; its management is detailed within ACSO 1203 – Army Maritime Instruction Army Maritime safety management[24] is overseen by the Chief Maritime Officer (Army) (CMO(A)) whose principal tasks are:

a. Responsible for the Army's maritime safety focus.

b. Army principal maritime Advisor on all maritime health, safety, and environmental protection issues.

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[24] Defence Safety Authority 01.1 - Regulations.

c.   Lead for Army maritime Governance and Assurance policy, implementation and compliance including ACSO 1203 – Army Maritime Instruction[25].

d.   Conducting of Maritime Second Party Assurance (safe to operate / operate safely) in concert with AMIAT (craft) and Captain Port Operations (marine facilities) where appropriate.

e.   Representing Army on all maritime related issues with Navy Command and DE&S as maritime capability lead.

f.   Army Maritime representative to Defence Maritime Regulator and Defence Fire Safety Regulator (DFSR) for the implementation of and compliance with Defence Maritime Regulations and all maritime related fire safety issues.

12.   Programmes Directorate (D Progs). D Progs is responsible for delivering the Army needs: be that the latest equipment, key logistical support, or developing new programmes. Key appointments are:

a.   Chief Engineer (Army) (Ch Engr (A)). The Army's engineering focus for Land Systems and Army boats, Ch Engr (A)'s principal safety tasks are:

(1)   Army principal advisor to stakeholders on in-service and future technical engineering and maintenance issues for Land Systems and Army boats and related equipment safety matters.

(2)   Chair the Land Systems Engineering Committee.

(3)   CGS' Service Advisor and the ACAI, lead for Army Land Systems and Army boats' maintenance policy and assurance.

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

(1)   Advising stakeholders for all new and in-service EOD&S equipment, providing support to DE&S in development of associated Safety and/or Environmental Cases.

(2)   Representing Army HQ at the Safety and Environmental Working Groups (SEWG) and signing Part 3 of the SECRs for EOD&S equipment.

(3)   Acting as the Competent Defence Advisor (CDA) for EOD&S.

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[25] A sub-ACSO as it is part of and contributory to the SEMS, not stand alone.

Specialist Directorates

13.   Director Personnel (DPers). DPers is responsible for the Safe People aspect of the SSW. Key appointments are:

      a.   Head Army Healthcare (Hd AHc). Is responsible for medical policy across the full spectrum of military activity including health, dental, occupational health, and environmental health.

      b.   AH Force Health Protection Group (AH FHPG). Is responsible for the providing advice and guidance for the prevention of occupational health challenges and co-ordination, provision, and assurance of occupational Health treatment.

      c.   SO1 Environmental Health Policy (Army) (SO1 EH Pol (A)). Is responsible for the co-ordination, provision, and assurance of Environmental Health (EH) delivery including food and water safety, infectious disease control, occupational hygiene, pest management and housing fitness across the Army. Details are contained within Ref A.

14.   Directorate Basing and Infrastructure (DB&I). DB&I has responsibilities as for the Basing and Infrastructure AOR including estate linked Climate Change, Sustainability and Environment and ensuring that DIO delivers its obligations for the provision of a safe, compliant, and fit for purpose Estate including the Safe Place (to live, work and train) component of an SSW. The key appointment is Head Infrastructure Plans (Hd Infra Plans), whose principal tasks are:

      a.   Defining requirements for sustainable and efficient infrastructure procurement, maintenance, and utility use across the Army estate.

      b.   Planning Army Estate development and setting infrastructure requirements for DIO in line with Army and Defence strategy.

      c.   Holding DIO to account for providing and maintaining an Army estate which is legislatively compliant, considering sustainability and environmental considerations.

      d.   Funding works required to ensure the estate is safe and compliant and accepting risks transferred from the DIO when required.

15.   Directorate of Army Legal Services (DALS). DALS is responsible for legal advice in relation to legislation, regulation, and compliance across the full spectrum of military activity.

Army Safety Group

16.   Army Safety Group (ASG). The ASG acts on behalf of DCGS to deliver the Army SEMS and associated ASEIP. Its two components: Functional Safety overseen by the Safety Centre and Capability Safety to assure that equipment is 'safe by design' and 'safe to operate' in accordance with UK law, MOD policy and the policy contained in the statement set out by the Secretary of State for Defence. Principal tasks are:

a.   Advising Army Senior Safety Managers (SSM) on the provision of Safety, Health, Environmental Protection and Fire Safety Management (SHEF) advice to stakeholders.

b.   Acknowledge, on behalf of the Army, safety risks including those transferred from Defence Equipment and Support (DE&S) through the risk referral process. Referring safety, environmental or fire issues to the AHSEC.

c.   Management of Occurrence Reports (ORs) that lead to external enforcement e.g., HSE Crown Censures and DSA enforcement.

d.   Assuring the Army capability programme safety management plans to ensure that Army programmes and acquisitions are conducted according to safety policy iaw additional Ref C.

e.   Assurance of all Safety and Environmental Case Reports (SECR), including those used by oTLB where the Army is designated lead user for IAW extant policy and regulations[26].

f.   Supporting senior officers in fulfilling their DoC responsibilities through FP (SHEF), including attendance at ministerial meetings and any enforcement action such as Crown Censures.

17.   Hd Safety (A). The Hd Safety (A) is accountable to the Army's Senior Safety Manager, on behalf of CGS, to provide: an effective Army SEMS that enables APs and DHs to deliver successful activity without unnecessary harm to people, equipment or the environment and an ASEIP to transform safety throughout the Army by fostering resilient, yet simple, safety and environmental management that engages with our people to promote effective risk-based safety behaviours and environmental compliance. Principal tasks are:

a.   Continuously improve the Army SEMS at all levels of the Army to deliver successful activity without unnecessary harm to people, equipment, or the environment.

b.   Direct strategy for FP (SHEF) management across the whole force.

c.   Ensure that all TLB safety and environmental related change programmes are managed to maintain coherence with CGS Safety Statement and Environmental Statement.

d.   Provide advice, guidance, and support to CGS, DCGS as Senior Safety Manager, Top Level APs, all APs, and DHs on delivery of their safety and environmental protection responsibilities.

e.   Deliver Ordnance Munitions and Explosives (OME) licensing and assurance ashore on behalf of CGS through the Inspector of Explosives (Army).

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[26] Defence Safety Case Regulations and JSP 376.

f.   Lead the Army FP (SHEF) investigation capability including Army Safety Investigations and liaison with the DSA on Army related Service Inquiries (SIs) and Non-statutory Inquiries (NSIs).

g.   Administer, enable, and assure the Army's engagement with the Defence Unified Reporting and Lessons System (DURALS) to provide an effective safety and environment occurrence reporting and lessons management system.

h.   Provide FP (SHEF) actionable intelligence to the SEMS governance system and enable Army organisations to access safety data, information, and analysis.

i.   Monitor and assess FP (SHEF) Performance Management in the Army and provide tools for performance management to APs.

j.   DoC responsibilities at home and overseas including assuring that the Army is balancing the achievement of operational outputs with operating safely through an SSW.

k.   Supply independent assurance to CGS on the control of FP (SHEF) related risks and effectiveness of SEMS management and, in pursuit of good practice and continuous improvement, actively benchmark other high-risk organisations, both military and civilian.

l.   Act as Director of the ASEIP, with DCGS as SRO, to deliver a safety resilient organisation with Full Assurance.

m.   Enable Continuous Improvement in FP (SHEF) culture and OL, including the provision of communication and information such as safety notices, instruction, and tools such as maturity assessments and cultural surveys.

n.   Be the capability sponsor for generic safety training, including the provision of Army FP (SHEF) Core Training and the Human Factors system enabling sufficient appropriate safety and environmental protection competence throughout the Army and nurturing the FP (SHEF) profession.

o.   Continuously enhance SEMS management by seeking coherence and collaborative working across the Army, LUCCS, DDS, DSA including Regulators, other Defence organisations, Allies, Statutory Regulators, investigative bodies, and commercial entities.

18.   Chief Environment and Safety Officer (Army) (CESO(A))[27]. DCGS is required to appoint a CESO(A) who works for Hd Safety (A) in support of Assistant Head Safety (Army) (AH Safety (A)) to provide advice on the delivery of Functional Safety and assurance on SEMS compliance, and to be the focal point for developing and co-ordinating advice on the implementation and compliance with legislation, regulation, and policy. CESO(A) also promotes continuous improvement and good practice through proactive engagement with the HSE, DSA, DDS, Trades Unions (TUs) and all other MoD

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[27] 20180423-A Review of the Army's Safety, Lessons, Organisational Learning and Assurance Mechanisms.

entities and external bodies associated with delivering the Army SEMS. Principal tasks are:

    a.   Provision of Army Functional Safety SME advice.

    b.   Leading the contribution to, consideration and dissemination of MOD SEMS Policy including Defence Regulation, Defence Codes of Practice (DCOPs) and others[28].

    c.   Developing and maintaining the overarching Army SEMS including responsibility for ACSO 1200 – The Army's SEMS.

    d.   Overseeing the 2nd Line of Defence (2LOD) Assurance for Functional Safety in accordance with ACSO 9001 and sub-ACSO 9016.

    e.   Communicating with the other Frontline Commands, Enabling Organisations, MOD Agencies, Government Departments, External Organisations and Statutory Enforcement Agencies.

    f.   Army Functional Safety representation as directed by Hd Safety (A).

Army Safety Group – Safety Centre

19.   Army Safety Group – Safety Centre (ASG-SC)[29]. The ASG-SC oversees the delivery of Functional Safety defined as 'the state of being protected from danger or harm' dependant on the correct functioning of safety-related systems and other risk reduction measures such as basic process control systems (BPCS) ie risk assessments through the Army SEMS and associated ASEIP. The ASG-SC mission is to '**To empower the protection of the Army's people; soldiers, civilians, and environment, in order to optimise operational outputs**' enacted through an SSW – Safe Persons, Safe Equipment, Safe Practice and Safe Place which must be identified for all activities including those considered routine. The ASG-SC functions are as follows[30]:

    a.   Plan – Defining and communicating the Army's specific safety policy that complies with MOD SHEF policy, regulation, and statutory legislation.

    b.   Do – Advising APs on their application of policy and providing them with the tools (including safety reporting, analysis, performance, and risk management tools) required to manage safety and environmental protection within their areas of responsibility.

    c.   Check – Providing assurance to CGS, via DCGS, of the effectiveness of the Army SEMS and leading DCGS's FP (SHEF) Investigations as required.

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[28] Legislation, Defence Regulation (DSA), DCOPs ie JSPs (DDS) and Policy ie ACSOs.
[29] Army/Strat/Org/IO/ASCen dated 04 Feb 19 - Establish the Army Safety Centre.docx (sharepoint.com).
[30] HS_EP_Functional_Strategy_-_Oct_2021.pdf (publishing.service.gov.uk).

    d.   Act – Coordinating continual improvement activities to deliver the Army Safety Vision and to deliver the recommendations from assurance activities and investigations.

20.   AH Safety (A). The AH Safety (A) is the military officer appointed to oversee Functional Safety, supporting the Army's SHEF function and ensuring coherence and consistency with Army Health and the Commands. Their responsibilities being representation, risk (oversight), reward (safety culture) and reputation (assurance) and whose principal tasks are:

    a.   Direction of Functional Safety outputs of the ASG Safety Centre.

    b.   Oversight and delivery of Continuous Improvement through the ASEIP.

    c.   Senior Safety Manager (SSM) for Army FSM.

    d.   Advising staff branches and the CoC on SEMS issues (inc DH21).

    e.   DIRLAUTH with the other FLCs, EOs (less DE&S) and TLBs on behalf of the Army for SEMS matters[31].

    f.   Monitoring and analysing Functional Safety performance including the Army's Functional Known Activity Risk (KAR) risk process.

    g.   Briefing Army Leadership cses (1*, CO Des etc) and others as appropriate.

    h.   Overseeing the Army's Functional Safety OL outputs.

    i.   Supporting senior officers in fulfilling their DoC responsibilities through FP (SHEF), including attendance at ministerial meetings and any enforcement action such as Crown Censures.

21.   SO1 Safety. The SO1 Safety is responsible for the PLAN outputs of the ASG-SC. Their responsibilities being command (of military personnel), support (to outputs) and enterprise communication whose principal tasks are:

    a.   Responsible for the Army Functional Safety (SHEF) Strategy and Plans interaction with the ACP and other supporting organisations and agencies.

    b.   Commanding the AFPA cadre and the Army Safety Investigation Team (ASIT).

    c.   Providing staff duties oversight to the ASG-SC including the ASG response to Functional Safety FOIs and PQs.

    d.   Contextualising Functional Safety OL in accordance with ACSO 1118[32].

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[31] Including Fire Safety Management.
[32] SO1 FP (SHEF) Organisational Learning Lead, ASG-SC.

e.   Monitoring the Army's safety culture and Functional Safety performance for trends and weak signals.

f.   Providing 1LOD of the ASEIP.

g.   Supporting Army Functional Safety engagement and communication, as necessary.

22.   SO1 Force Protection (SO1 FP). SO1 FP is responsible for the 'DO' outputs of the ASG-SC. Principal tasks are:

a.   Providing Functional Safety (SHEF) advice and guidance to the CoC as necessary supported by:

(1)   Safety advice and guidance through the SO2 FP(A).

(2)   Environmental Protection (EP) advice and guidance through SO2 FP(B).

(3)   Fire Safety Management (FSM) advice and guidance through SO2 FP(C).

b.   Maintaining the currency of the Army Code of Practice (Army COP) FP (SHEF) Frameworks.

c.   Consulting with the Army's Commands and internal MOD bodies including DSA regulators and Head Office (DDS and LUCCS) including safety advice letters and electronic Safety Notices (eSN) are promulgated through the CoC as the ASG Functional Safety POC.

d.   Representing the ASG-SC at Army and MOD committees for FP (SHEF) issues as directed.

23.   SO1 Assurance. SO1 Assurance is responsible for the CHECK outputs of the ASG-SC. Principal tasks are:

a.   Delivering the 2LOD for Functional Safety in accordance with ACSO 9001[33] and sub-ACSO 9016[34].

b.   Maintaining the ASEIP.

c.   Management and oversight of the Army Known Activity Risks (KAR) for safety, EP and FSM.

d.   Supporting the ASG-SC contribution to R2 including Strategy Delivery Synchronisation Matrix (SDSM) and Quarterly Performance Review Report (QPRR).

e.   Currency and maintenance of the Army SEMS legal register.

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[33] ACSO 9001 is revised annually and is available on the ACSO Landing page.
[34] ACSO 9016 is revised annually iaw with the policy laid down in ACSO 9001.

f.   Coordinating the Army's SEMS assurance activities including the Army's SEMS Annual Assurance Report and Mid-Year Report.

24.   SO1 FP (SHEF) Organisational Learning & Lessons (SO1 FP (SHEF) OLL). SO1 FP (SHEF) OLL is responsible for the ACT outputs of the ASG-SC. Principal tasks are:

a.   Delivering Functional Safety OL in accordance with ACSO 1118[35] through SO2 OL.

b.   Developing Army Functional Safety engagement and communication including coordination of FP (SHEF) messaging including Army Force Protection Bulletins (AFPB) from Army HQ, as necessary.

c.   Deliver an effective and assured Safety Lessons Management process on behalf of Hd Safety (Army).

d.   Identify Army Safety OL themes and trends across all mediums available to reduce the likelihood of similar occurrences in the future.

25.   Inspector Explosives (Army) (IE(A)). IE(A) principal tasks are:

a.   Licensing and Assurance of all Army explosives facilities (and UK Strat Com sites listed in the relevant CSA) in the UK and Overseas directly or through formal delegation to the Ammunition Inspectorate.

b.   Enabling the maintenance of and compliance by the Army with Defence OME Regulations.

c.   Acting as the Competent Defence Advisor (CDA) for OME.

d.   Provision of Ordnance, Munitions and Explosives (OME) subject matter expertise to the Army CoC (and UK Strat Com / PJHQ on request).

26.   ASIT. The ASIT provide the Army's FP (SHEF) investigative capability and conduct demonstrably independent safety investigations of serious[36] occurrences or other Functional Safety activities across the Army to determine causal factors and make targeted safety recommendations to reduce the likelihood of reoccurrence. The ASIT then track these to implementation in order to support OL, enhance safety and sustain the Army's operational capability. Principal tasks are:

a.   To undertake FP (SHEF) investigations as directed by AH Safety (A).

b.   To oversee the content and currency of the Army Force Protection Investigator's (FPI) cse.

c.   To support the CoC and units on the delivery of FP (SHEF) investigations at the appropriate level (Minor and Near Miss).

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[35] SO1 FP (SHEF) Organisational Learning Lead, ASG-SC.
[36] HSE definition: Over-seven-day injuries to workers. This is where an employee is away from work or unable to perform their normal work duties for more than seven consecutive days (not counting the day of the accident).

    d.   To undertake quality control of investigative activity within DURALS on behalf of the Army.

27.   **Army Force Protection Advisors (AFPA).** The AFPAs are a military cadre of FP (SHEF) professionals who operate across the Army responsible for a defined portfolio of units based on their geographical location as directed by the ASG-SC ensuring that every deployable Regular and Reserve unit has access to an SME who operate using the principle of 'on demand at the point of need'. Principal tasks are:

    a.   Delivery of FP (SHEF) training at Practitioner and Manager level for safety, EP, FSM and FPI.

    b.   Provision of FP (SHEF) advice and guidance.

    c.   Conduct of Army distributed training activity as directed (2LOD).

    d.   Support to Army and unit safety investigations, as necessary.

    e.   Any other associated tasks as directed by the ASG-SC.

Army Safety Group – Capability Safety

28.   **Army Safety Group – Capability Safety Operations and Policy.** The ASG Cap Safety Ops and Pol branches are responsible for ensuring Army capability is safe by design, safe to operate and is operated safely. In addition to this, they ensure that throughout the whole CADMID cycle, safety is managed and maintained in accordance with policy and regulations[37], utilising the DE&S Command Acquisition Support Plan (CASP)[38] as detailed in additional Ref C.

Army Commanders

29.   **Army Commanders**[39]. Army Commanders are the Senior Safety Operators (SSO) for their Command Area of Responsibilities (AoR) responsible for ensuring CGS's direction and priorities are followed and setting the standards for FP (SHEF) within AoRs. They are to chair their Command FP (SHEF) committees at least annually and ensure that robust mechanisms are in place for the management of FP (SHEF) risk. Principal tasks are:

    a.   Establish and promote a safety culture within their AoR.

    b.   Ensuring that there are suitable and sufficient organisation and arrangements in place for the discharging of their Statutory DoC responsibilities.

    c.   That C2 of SRM is to be aligned to the OPCOM CoC to ensure personnel are operating in accordance with the agreed thresholds and an SSW including:

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[37] Noting that Air System Safety and Environmental Cases are controlled separately by the MAA.
[38] Primary interfaces with the CASP are Directorate Futures (D Futures) and Directorate Programmes (D Progs).
[39] Comd HC, CFA and Comd JAC.

(1)   Ensuring that the SRM processes are applied to all activity within their AoR.

(2)   Where appointed conduct the roles and responsibilities of the 'Risk Owner'.

(3)   Where appointed conduct the roles and responsibilities of the 'Activity Owner'.

(4)   Ensure that Force Elements are sufficiently supported in their FP (SHEF) responsibilities[40].

(5)   Where appointed conduct the roles and responsibilities of the ODH including appointing DDH as deemed appropriate to support the continued delivery of operational outputs.

(6)   Provide 2LOD of activity within the AoR as required.

(7)   Attend the Army Health, Safety and Environmental Committee (AHSEC).

(8)   Maintain a FP (SHEF) risk register[41] for:

(a)   All risks for which they are accountable and responsible within their AoR.

(b)   All dispensations they have authorised.

(c)   All activities that have been escalated to SDH level for oversight.

30.   DCOS Fd Army is responsible for the "safe to operate" of all Land equipment (in service, upkeep, upgrade and update, which includes the maintenance of Safety Arguments.

31.   ACOS Equipment (ACOS Eqpt) oversees a Whole Force approach (including HC and JAC Force Elements) for equipment support and is responsible for Through Life Support (TLS).

32.   ACOS Logistics (ACOS Log) oversees a Whole Force approach (including HC and JAC Force Elements) for logistic support and is responsible for LogSp supply supported by:

a.   DACOS Logistics (DACOS Log). DACOS Log is responsible for Fuel and Gas[42], Movement and Transport, and Logistic Support and is supported by:

(1)   SO2 Fuels. Has responsibility for ensuring Defence regulatory compliance across the Army to support the Logistic Proponent for setting Army policy,

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[40] For Fd Army this is through the Land Operations Command (LOC).
[41] An example of which is available on the Army Force Protection (SHEF) Framework.
[42] Including responsibility for The Dangerous Substances and Explosive Atmospheres Regulation 2002.

identifying the standards applicable within their area of expertise for Fuels, Lubricants & Industrial Gases (FLIG) and associated Infrastructure.

(2)   Command Petroleum Warrant Officer. Has the responsibility for ensuring the Logistic Support Assurance Framework (LSAF) and Specialist Petroleum Inspections (SPI), which are conducted by HQ RC Petroleum Inspectorate (PI), are met appropriately. The HQ RC PI maintain the technical responsibility for the safe storage and handling of Fuel, Lubricant and Gases at 1st and 2nd Line, communicating all areas of concern or consideration for future risk mitigation. Post tend analysis the findings are then appropriately messaged into the Logistic proponent, offering technical SME guidance and direction with FLIG matters and associated Infrastructure.

(3)   Command Master Driver (Comd MD). The CMD is responsible for the 'Operate Safely' through the control, management and operation of all MOD vehicles and ensuring compliance with Defence regulations, DCOPs and policy.

(4)   Staff Master Drivers (SMD). SMDs typically sit in 2* formations (fmns) and other establishments which require high level Subject Matter Expertise (SME) input and support the CMD through the control, management and operation of MOD vehicles and ensuring compliance with Defence regulations and policy within their formation / establishment. SMDs in 2* fmns also provide the SME direction and guidance of road transport related activity to their Brigade MDs and investigation into RTC occurrences as appropriate.

(5)   Master Drivers (MDs). MDs are usually located in 1* fmns and provide SME input to their formation HQ and units for the control, management and operation of MOD funded vehicles and ensuring compliance with Defence regulations and policy within their formation / establishment and investigation into RTC occurrences as appropriate.

b.   Chief Ammunition Technical Officer (CATO). CATO is responsible for Explosives Safety and their principal tasks are:

(1)   Advising the CoC with functional technical advice for ammunition natures across the Army.

(2)   Assuring all explosives activity across Army Command sites including exercises and operations.

(3)   Acting as the technical authority for Munitions Occurrence Reports.

33.   Joint Aviation Command (JAC). In addition to the responsibilities mentioned above, JAC works within Total Safety Management governance, incorporating both Aviation and Functional Safety (SHEF) responsibilities. Where appropriate Comd JAC may produce an Applicability of Instructions – Memorandum of Agreement with RN or RAF units to facilitate continuity of delivery using their respective SEMS[43]. Principal tasks are:

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[43] RN – BRd10 or RAF - AP8000.

a. Delivering the JAC Ground Safety Management Plan (GSMP) and associated assurance activity.

b. Conducting 2LOD fire assurance across JAC fmns/units for both Fire Safety Management (FSM) and Operational Support (Fire) (OS(F)) in conjunction with Fire Risk Management and Assurance (FRMA).

34. 2* Commanders. 2* Commanders are responsible for ensuring that their superior Commanders' intent, direction, and priorities are followed and ensuring that subordinate Commanders understand their FP (SHEF) risk management intent. Principal tasks are:

a. Establish and promote a safety culture within their AoR.

b. Appoint an officer to lead on FP (SHEF) management and are advised to appoint a senior officer as a FP (SHEF) proponent – a 'Safety Champion'.

c. Ensure that the SRM processes are applied to all activity within their AoR.

d. Oversee and monitor the activities of subordinate Risk Owners in order to provide advice and guidance.

e. Where appointed conduct the roles and responsibilities of the 'Risk Owner'.

f. Where appointed conduct the roles and responsibilities of the 'Activity Owner'.

g. Where appropriate provide advice and guidance to the DDH and ODH to support their decision-making processes.

h. Provide 1LOD of activity within the AoR as required.

i. Assure that FP (SHEF) risk is appropriately managed during the conduct of activity for which they have oversight.

j. Maintain a register of all FP (SHEF) risks for which they are accountable and responsible within their AoR.

k. Maintain a register of all dispensations they have authorised.

l. Chair FP (SHEF) committees as appropriate.

35. 1* / OF5 Commanders. 1*/OF5 Comds are responsible for ensuring that CGS's and other superior Commanders' intent, direction and priorities are followed. They are to ensure that subordinate Commanders understand their FP (SHEF) risk management intent and have access to appropriate SME advice. Where this does not exist, Commanders are to nominate a senior officer as the FP (SHEF) focal point within their organisation – 'a Safety Champion'. Principal tasks are:

a. Establish and promote a safety culture within their AoR.

b.   Appoint an officer to lead on FP (SHEF) management and are advised to appoint a senior officer as a FP (SHEF) proponent – a 'Safety Champion'.

c.   Ensure that the SRM processes are applied to all activity within their AoR.

d.   Oversee and monitor the activities of subordinate Risk Owners in order to provide advice and guidance.

e.   Where appointed conduct the roles and responsibilities of the 'Risk Owner'.

f.   Where appointed conduct the roles and responsibilities of the 'Activity Owner'.

g.   Where appointed conduct the roles and responsibilities of the DDH.

h.   Provide 1LOD of activity within the AoR as required.

i.   Assure that FP (SHEF) risk is appropriately managed during the conduct of activity for which they have oversight.

j.   Maintain a register of all FP (SHEF) risks for which they are accountable and responsible within their AoR.

k.   Maintain a register of all dispensations they have authorised.

l.   Maintain a register of all activities that have been escalated to ODH level for oversight.

m.   Chair FP (SHEF) committees as appropriate.

36.   **Head of Establishment (HoE).** HoE should be formally appointed through their Assignment Order with their role and responsibilities contained within <u>ACSO 1105 – Head of Establishment (HOE) Responsibilities</u> and are assured through HQ RC. HoEs are to ensure that they have suitable Organisation and Arrangements in place to cover all their responsibilities including their establishment's FP (SHEF) delivery plan which must be reviewed annually.

37.   **Commanding Officers.** As those closest to the conduct of hazardous activity, unit Commanders have a key role to play in Army FP (SHEF). They are to ensure their superior's direction and priorities are followed and that all subordinates understand their intent. All CO's must:

a.   Establish and promote a safety culture within their AoR.

b.   On appointment, sign their unit's FP (SHEF) delivery plan, which must be reviewed annually.

c.   Ensure that all personnel with FP (SHEF) related responsibilities have clear Terms of Reference (ToR).

d.   Ensure that the FP (SHEF) risk management processes are applied to all activity within their AoR.

e.   Oversee and monitor the activities of subordinate Risk Owners in order to provide advice and guidance.

f.   Where appointed conduct the roles and responsibilities of the 'Risk Owner'.

g.   Where appointed conduct the roles and responsibilities of the 'Activity Owner'.

h.   As a Force Generating (FGen) CO communicate any risks or failures to achieve the stated requirements to the 'Activity Owner'.

i.   Where acting as a FGen CO, conduct the roles and responsibilities of the FGen CoC e.g. ensure that all persons authorised to conduct activity outside the unit are sufficiently prepared for the activity; ensure they are 'safe to operate' and have the means to 'operate safely' as directed by the 'Activity Owner' – FGenO.

j.   Provide 1LOD of activity within the AoR.

k.   Assure that FP (SHEF) risk is appropriately managed during the conduct of activity for which they have oversight.

l.   Maintain a register of all FP (SHEF) risks for which they are accountable and responsible within their AoR.

m.   Chair the unit FP (SHEF) committees as appropriate.

38.   Officers and NCOs. This is the most important level as it is where risk is most apparent and intervention most critical. Good FP (SHEF) performance is achieved by Commanders at all levels, but particularly at the junior leadership levels, understanding their DoC obligations for managing risk for those employed under their command (and others affected by acts and omissions). This is particularly important if and when the situation changes and requires a dynamic review of the Risk Assessment. Junior Commanders must be trained for their respective roles and understand how those roles are to be conducted safely. They have a duty to stop or pause activity if they feel it has become dangerous and is no longer controlled to the correct standard; this is particularly pertinent when a situation has changed or a 'last minute good idea' becomes apparent. Whilst initiative and innovation are encouraged, consideration must be given to the risks to personnel and the environment. See Ch 2 – SSW, paras 12 & 13 regarding innovation.

39.   Line Managers. All line managers are responsible for providing a SSW and must understand these obligations, continue to assess the risks dynamically, demonstrate good judgement and reasonable decision making, record their decisions and report any incidents. Additionally, SO2 and/or SO3 SHEF must ensure that they attend appropriate establishments FP (SHEF) committees within their AOR.

40.   Individual Responsibilities. All military personnel, civilian employees, contractors, and visitors are to take reasonable care of their own safety and that of others who may be affected by their acts or omissions at work. The management of visitors to Army sites is contained within JSP 375, Vol 2, Chap 34[44]. All occurrences (accidents, incidents, near misses, dangerous occurrences, serious equipment failures or unsafe practices) are to be reported in accordance with Ch. 7.

41.   Environmental Protection. EP is a key requirement for all Army units, sites and personnel. For certain sites there may be a requirement to undertake the Defence Climate Risk Analysis Methodology (DCRAM) training and support for which is available through AFPAs. The details for which are contained within the unit/site FP (SHEF) Framework.

42.   Fire Safety Management. All personnel are responsible for the protection of life delivering FSM across the Army. The details for which are contained within the unit/site FP (SHEF) Framework.

43.   Overseas Locations. In addition to the responsibilities set out above, Commanders in overseas locations, including Defence Attaches shall, so far as is reasonably practicable publish a command level FP (SHEF) O&A policy that draws together UK and Host Nation requirements for compliance by all employees of the command, irrespective of their parent TLB or budgetary status.

Youth Services

44.   Army Cadets. Army Cadets are a recognised youth organisation commanded by HQ Cadet Branch[45] responsible for delivering the Army's DoC, support, and assurance to Army Cadets, primarily Army Cadet Forces (ACF) and, where appropriate, Combined Cadet Forces (CCF). HQ RC Cadet Branch are responsible for the delivery and maintenance of the Army Command Standing Order 1210 – Army Cadets Safety Management System (ACSO 1210 – Cadet SMS) which, whilst subordinate to this ACSO is endorsed by GOC RC and assured independently.

45.   Defence Children Services (DCS). DCS deliver a global education and care service for Defence. Hd DCS's services are commissioned by Dir OB (for NATO and Cyprus), Comd HC (for QVS Dunblane), GOC RC (for Brunei and Sennelager), and CFA (for Canada and Kenya). These are provided through the Chief Education Officer's Schools and Settings (S&S), Specialist Support Services (SSS) and the Schools Interface Services (SIS) Operating Pillars. S&S provides education and early years services, SSS provide an Education Advisory Team, Education Psychology clinical services, Speech and Language clinical services, safeguarding services, Virtual Schools, Overseas Special Education Needs Supportability, and the British Forces Welfare Service. SIS provides the interface between the BLB and Schools. It manages Infra, IT, Fin, HR, Data and SHEF business activities.

46.   DCS operates from two UK and twenty overseas locations. All its activities are conducted within the supporting and enabling envelop of the service users (garrison and

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[44] JSP375, Pt.2, Vol.1, Ch. 34.
[45] HQ Cadet Branch are contained within and supported by HQ RC.

station commands) who capture, with DCS SME and School Governor Committee advice, associated risks on behalf of DCS's commissioners. Due to the nature of their outputs, DCS are responsible for the content of Army Command Standing Order 1212 – DCS Safety Management System (ACSO 1212 - DCS SMS) which is endorsed by GOC RC and Director Overseas Basing while being independently assured by AFPPol under CDP.

Part 2

47.   Safety Responsibilities and Arrangements. Army FP (SHEF) governance responsibilities are contained at in Table 3 below.

Ser	Task	Conducted by
1	**Operate Safely**. Operate within the SSW whenever possible (Ch. 2) ensuring supervision is in place and that dynamic risk assessments are conducted if the situation changes. When not possible the 5Ts methodology should be employed; Terminate (cease), Treat (suitable controls to achieve a 'safe system'), Transfer (escalate), Tolerate (accept) or Take (the opportunity) [46].	**All**
2	**Enhance Just safety culture**. A strong FP (SHEF) culture is at the heart of safety performance. Setting standards, demonstrating FP (SHEF) leadership, recognising, and rewarding good behaviour and taking appropriate action against reckless behaviour or deliberate non-compliance, combine to ensure the right culture is achieved.	**All Comds, Fmn, HoE and Units**
3	**Consultation**. Ensure that their personnel, whether military or civilian, are consulted on Safety issues through Site Safety Meetings.	**Fmn, HoE, Unit,**
4	**Publish signed and dated FP (SHEF) Organisation and Arrangements Policy**. The Management of Health and Safety at Work Regulations 1999 requires that employers describe, in writing, their organisation and arrangements for ensuring the health, safety and welfare of their employees and anyone else affected by their activities. Defence policy extends this legal requirement for describing organisation and arrangements to include the protection of the environment. The individuals with this responsibility include the TLB Hd/CE, CO or HoE with each being required to set out the organisation and arrangements (O&A) in a statement that is appropriate to their level of responsibility and is signed, dated, and displayed prominently in their area of responsibility. There is no mandated or statutory format for O&A statements but to ensure a degree of consistency across Defence such statements should, as a minimum, contain the following information, which builds on the HSE's expectations for safety management:	**Fmn, HoE, Unit**

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[46] JSP 892_Part 1 – Risk Descriptions.

a. A reflection of the personal commitment of the Comd/CO/HoE to FP (SHEF) (referencing CGS's Statement of Intent).

b. The requirement for the assessment of the risks to employees, contractors, customers, partners, and any other people who could be affected by your activities and to record the significant findings in writing.

c. Any risk assessment must be 'suitable and sufficient'.

d. Arrangements for the effective planning, organisation, control, monitoring and review of the preventive and protective measures that come from risk assessment.

e. Access to competent health and safety advice.

f. The provision of employees with information about the risks in your workplace and how they are protected.

g. Instruction and training for employees in how to deal with the risks.

h. Ensuring there is adequate and appropriate supervision in place.

i. Consulting with employees about their risks at work and current preventive and protective measures.

j. Creation of FP (SHEF) Delivery Plan[47] (cascaded from higher formation to unit level). This must be signed on appointment and reviewed annually.

k. The arrangements for the investigation of accidents and near misses in order to provide a mechanism to identify and learn lessons to ensure the prevention of recurrence.

l. The arrangements for providing Coordination, Cooperation, Communication and Control (4Cs) for lodger units, contractors and visitors in accordance with JSP 375, Vol 1, Chap 34. For lodger units, this is to be underpinned by a signed Memorandum of Agreement.

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[47] Utilising the Army's SEMS Framework.

5	**Appoint a Safety Champion to the Command Board**[48]. COS/ DCOS, or an officer of similar status, should be appointed the Command Board's FP (SHEF) Champion.	**Fmn, HoE,**
6	**Reporting**. Encourage a reporting culture and ensure that **all** incidents, including near misses, are reported using the DURALS.	**Fmn, HoE, Unit**
7	**Investigations**. Ensure that all occurrences are investigated appropriately and recorded on DURALS.	**Fmn, HoE, Unit**
8	**Safety Performance Measurement and Review**. Ensure that safety performance measurement occurs and that it is reviewed in detail by Safety Committees.	**Fmn, HoE, Unit**
9	**Establish a FP (SHEF) Committee**. Ensure that the FP (SHEF) committee meets on a regular basis and is chaired by the Commander/FP (SHEF) Champion (at least once per year). The FP (SHEF) Delivery Plan should be a standing agenda item at these meetings.	**Fmn, HoE, Unit, Subunit**
10	**MS Recognition**. Ensure that subordinate Commanders' job specifications set out FP (SHEF) responsibilities and ensure, where possible, that annual appraisal reports reflect FP (SHEF) leadership and management.	**Fmn, HoE, Unit, Subunit**
11	**Appoint a Safety Risk Advisor (SRA)**. Each site/unit must appoint an SRA to take the lead on safety risk management (SRM) with the principal responsibilities contained with the FP (SHEF) Framework. The nominated person, which is usually the Regimental Operations Officer (Ops Offr) or equivalent, must be educated in iaw Ch 14.	**HoE/Unit**
12	**Appoint an Environmental Facilities Safety Advisor (EFSA).** Each site/unit must appoint an EFSA to take the lead on environmental and facilities safety management with the principal responsibilities contained within the FP (SHEF) Framework. The nominated person, which is usually the Quartermaster (QM) or equivalent, must be educated iaw Ch 13.	**HoE/Unit**

[48] Good practice.

13	**Appoint a Fire Prevention Safety Advisor (FPSA)**. Each site/unit must appoint an FPSA to take the lead on fire safety management with the principal responsibilities contained with the FP (SHEF) Framework. The nominated person, which is usually the Quartermaster Technical (QM(T)) or equivalent, must be educated iaw Ch 13.	**HoE/Unit**
14	**Appoint an Organisational Learning & Lessons (OLL) Gatekeeper**[49]. Each site/unit must appoint an OLL Gatekeeper, which is usually the Regimental Training Officer (RTO) or equivalent, to take the lead on OL.	**HoE/Unit**
15	**Appoint a Safety Risk Manager (SRM)**. Each <u>subunit</u> must appoint a SRM to take the lead on safety risk management within the subunit with the principal responsibilities contained within the FP (SHEF) Framework. The nominated person must be trained in iaw Ch 13.	**Subunit**
16	**Appoint an Environmental and Facilities Safety Manager (EFSM).** Each <u>subunit</u> must appoint a EFSM to take the lead on environmental and facilities safety management with the principal responsibilities contained within FP (SHEF) Framework. The nominated person must be trained iaw Ch 13.	**Subunit**
17	**Appoint a Fire Prevention Safety Manager (FPSM)**. Each subunit must appoint a FPSM to take the lead on fire safety management within the <u>subunit</u> with the principal responsibilities FP (SHEF) Framework. The nominated person must be trained iaw Ch 13.	**Subunit**
18	**Appoint a Force Protection Investigator (FPI)**. Each <u>subunit</u> must appoint an FPI to take the lead on FP (SHEF) investigations within the subunit with the principal responsibilities contained within FP (SHEF) Framework. The nominated person must be trained in iaw Ch 13.	**Subunit**

Table 3. Army FP (SHEF) Delivery Responsibilities

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[49] ACSO 1118 DURALS Gatekeeper is the appointed Organisational Learning Lead (OLL).

Chapter 2

The Safe System of Work (SSW)

Additional references:

A.   DLSR/RN/22/002 - Trails and Experimentation.
B.   JSP 376: Defence Acquisition Safety Policy.
C.   ACSO 1209 – Authorisation of Comparable activities which are not categorised as adventurous training or sport.

Introduction

1.   Health and Safety legislation requires all activities to be conducted within an SSW. In the military context this includes all training activities:

   a.   SSW[50]. In order to ensure uniformity of practice and clarity of implementation, all military SSWs consist of a generic format which is broken down into 4 parts:

      (1)   <u>Safe Persons</u>. Personnel who have been given the appropriate information, instruction, training, and supervision to enable then to conduct a specific activity as a competent person with the appropriate qualification, currency, maturity, and experience.

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

      (3)   <u>Safe Practice</u>. The safe conduct of any activity, including those arising from the use of equipment, in a specific location, by competent Persons. Safe practices are conducted in accordance with drills and instructions laid down by the Service authorities and normally contained in documentation.

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

Part 1

1.   The SSW is a useful framework and will, in most cases, reduce risk to ALARP and Tolerable ensuring DoC obligations are being met. Risk may only be accepted within the authorised threshold of a Commander without seeking higher authority where the activity risks are significant, and/or there is an operational (or training) imperative to deviate from

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[50] JSP 375 Vol 1 Ch 8 refers.

the approved SSW in order to conduct an activity in the interests of Defence. CGS may direct that, in order to meet DoC obligations in specific circumstances, the Duty Holding 2021 (DH21) process is followed to add focus and emphasis to SRM and a rapid escalation process. As the application of DH21 is primarily conditions based (less aviation) and therefore not persistent.

Duties

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

3.   2* Commanders. The FGen 2* Commander must study submissions made by the FGen 1* wishing to deviate from Service Instructions, DCOPs, Policy, Regulations and Directives, particularly if it involves live fire training. If the Defence imperative is identified and following advice from the relevant SMEs and Safety and Environmental Committee, they are satisfied that the risks are ALARP and Tolerable[51], they can approve the activity. It is normally only the FGen 2* Commander who can approve such activities. The approvals must be documented.

4.   1* Commanders. 1* Commanders (or where appropriate OF5) must study the submissions made by their subordinate Commanders for activities carrying significant risk that cannot be managed within the SSW. If the Defence benefit is critical, the 1* Commander can suggest and/or resource additional controls to bring the activity back to within an SSW or escalate the submission to the 2*/3* level, otherwise moderate the directed requirement to reduce the risk. 1* Operational Theatre Commanders are permitted to authorise Operational Dispensations. An Initial Operational Dispensation may be granted for a period of 28 days whilst an Urgent Statement of User Requirement is developed, and the submission is then considered by the FGen 2* Commander and the relevant Safety and Environmental Committee.

5.   Commanders, normally COs who direct activity, are to ensure that:

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

   b.   Policy, Regulations, Directives, Service Instructions and Defence Codes of Practice (DCOP) applicable to the activities are complied with in full and are communicated to those supervising and delivering the activity, as well as the participants.

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

    c.   The SSW is applied to every activity, including activity undertaken on operations[52]. If the particular activity is not already covered by an existing SSW, an activity-specific risk assessment covering all areas of the SSW must be undertaken and any control measures required must be implemented in full.

    d.   Activity participants are informed of the hazards they will face during the activity.

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

    f.   Records of key meetings are to be kept and any lessons learnt during the conduct of activities are to be documented[53] and, where appropriate, implemented.

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

6.   **Persons Undergoing Training (PUT).** The level of supervision and competency of those instructing and supervising will be directed by the appropriate Commander. Personnel undergoing training are not considered Competent until they have met the test of Qualification, Currency, Experience and Maturity. Trainees are to adhere to all instructions delivered before or during training. In basic training officer cadets and Phase 1 soldiers are required to undertake arduous training to develop military skills and train them to be able to pass ITR 2. Therefore, there is an exception in basic training establishments IOT develop the mil skills required to pass RFT(S).

7.   **Army Arduous Training (AAT) Activities.** Army Arduous Training (AAT) definition is below:

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

8.   Commanders' are to ensure that **all** individuals have achieved ITR 2 standard for their cap-badge/role prior to participating in Army Arduous Training (AAT)[54] alongside any other guidance on fitness standards from the host unit. It is not definitive, and Commanders **must** gauge their own activity against those examples and **ensure** they apply the appropriate SRM process. An illustrative list of known Army Arduous Training (AAT) activities alongside normal activities is at Annex A.

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[52] It must also be acknowledged that the activity may be influenced by an adversary.
[53] Using the DURALS to facilitate knowledge sharing.
[54] AGAI Vol 1 Ch 7.

9.   For those activities that are not categorised as Army Arduous Training, Adventurous Training or Sport reference should be made to additional Ref C which outlines the procedures for the authorisation and conduct of activities which, by their very nature, are comparable to AT and/or Sport, but are not categorised as such within Joint Service policy.

10.   Service Animals. All military ceremonial equestrian activities are to follow the Household Cavalry Mounted Regiment (HCMR) and The King's Troop RHA (KTRHA) SSW processes. For State ceremonial, these are assured through HQ LONDIST with all other Army military equestrian activities by the Defence Animal Training Regiment (DATR). For Military Working Dogs (MWD) the SSW should be produced and assured by the DATR.

11.   Innovation. Innovation is primarily an activity conducted within units, as directed by the CoC, and can be described as 'the use of a procedure and / or piece of equipment to assess its suitability for potential adoption'. Innovation activity by its very nature will fall outside of a standard SSW and therefore a bespoke SSW will need to be created. This requires a suitable and sufficient Risk Assessment to be conducted which covers all elements of the SSW with any residual risk being held at an appropriate level. The principles of Army innovation are:

   a.   The procedure and / or equipment must be used to achieve a specified intent linked to a military capability.

   b.   The procedure and / or equipment must be used for a time bound period only ie a one-off.

   c.   The procedure / equipment must be undertaken within an SSW with a suitable and sufficient risk assessment.

   d.   If the innovation is considered successful by the CO and endorsed by the CoC, a decision must be taken in regard to innovation outcome which could be terminate, further innovation to refine, transfer to Army Experimentation and Trials Group (ETG) or procure and bring into service through Rapid Acquisition Team.

12.   Experimentation and Trials. Recognising that, by their very nature, a unique SSW will need to be created for Trials and/or Experimentation, the DH21 construct is to be articulated in the Activity Directive. For activity that has been designed by and/or directed and delivered by an Army ETG unit, the ODH is CFA with Comd ETG, LWC as the DDH[55].

13.   All trials and experimentation activities must be carried out iaw additional Refs A and B. With the force preparation requirements being clearly articulated in the Experimentation and /or Trials Directive to inform the force generation activity. However, the CO of the providing unit retains responsibility for safely generating force elements prepared in all respects to conduct the planned trials and experimentation activities.

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[55] Commander Experimentation and Trials Group (sharepoint.com) is required to attend the GDHC as per DH21.

14.   Safety on Operations. Safety on operations remains a key component for Force Elements considering the operational realities. Within the SSW, there may be risks, resulting from certain hazards within the operational environment, which must be accepted due to limits on the controls which could be put in place to reduce the risk. Responsibility for accepting the increased level of risk lies with the Operational Commander (and the Operational CoC); noting that all decision making must be recorded.

Part 2

15.   **Safe Operating Envelope**. It is common for military activity and/or operations to be delivered within a Safe Operating Envelope allowing for bounded flexibility within the activity[56]. When planning a Safe Operating Envelope, a variety of contributing elements to the successful completion of the task should be considered including, but not limited to, climatic controls, fire safety, health and hygiene, infrastructure, legal, medical, security, people and/or vehicle movement and reputation.

Training[57]

16.   Persons at Risk during Military Training. There are 3 categories of people at risk in training:

   a.   The military personnel undergoing training and those conducting it.

   b.   Controlled personnel including Army Cadets, Cadet Force Adult Volunteers (CFAV)[58], civilian staff and contractors employed in support of training.

   c.   The General Public. This includes those unaware of the military training activity and in the worst case, the trespasser, who deliberately disregards warnings or is unable to interpret warning signs for whatever reason.

17.   Considering that those under training **cannot be deemed competent**, using the standard SSW format when conducting any training activity enables the Army to meet its training requirement ensuring that personnel are prepared for operational roles whilst maintaining risks at ALARP and Tolerable. It is essential that those who direct and manage the training are competent.

18.   The acceptable level of training risk is set by the appropriate Commander who owns or is responsible for the training audience. Considering the constraints imposed by the Training Imperative, the assessed hazards and the consequent controls must be approved at the highest level appropriate and integrated into formal procedures with additional considerations as follows:

   a.   Safe Persons. It is essential that Commanders ensure instructors are competent and given the appropriate level of supervision to ensure that the delivery of training matches the ability of the trainee and complies fully with the SSW.

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[56] It should be noted that due to the remote locations of some DE/STTT activity Medical Plans[56] in support of such activity should be considered at the 1* level in the first instant.
[57] JSP 375 Volume 1.
[58] ACSO 1210 – Army Cadet SMS.

b. Safe Equipment. Commanders must ensure that their subordinates and trainees have, and make use of, the correct equipment to conduct an activity. Commanders must ensure that it is operated and maintained as directed in SSW and ensure that only competent persons operate and service the equipment. Complete training and maintenance records must be kept along with any reporting to the capability sponsor and the ASG-SC.

c. Safe Practice. All training should consider the Training Imperative and follow the Defence Systems Approach to Training (DSAT). It is essential that all training is closely supervised by a competent person to ensure that procedures are strictly adhered to along with the use of Personal Protective Equipment (PPE) and the provision of warnings. Complete training records must be kept and accompany the officer or soldier.

d. Safe Place. A Safe Place is one in which the controls necessary to enable authorised training to be conducted safely, have been identified by a site-specific risk assessment; and directed through appropriate Standing Orders such as Trg Area and/or Range Standing Orders; and implemented in full.

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

a. Establish that where any of the elements of the SSW are not in place, the hazards that arise are recognised along with the corresponding residual risk that they pose.

b. Analyse the residual risk to decide if the residual risk is:

(1) Adequately controlled. Where the risks are deemed by the Commander in charge of the training activity to be ALARP and Tolerable, the activity can be conducted.

(2) Not adequately controlled. Where the risks are deemed unacceptable by the Commander in charge of the activity, further measures are to be introduced to reduce the risk to ALARP and Tolerable before the activity can be conducted.

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

21. Exercise Instructions. All exercise instructions including Risk Assessments / EASP / RASP and medical plans, irrespective of the activity, should be appropriately endorsed to demonstrate that an assurance check has been conducted on the quality of the documentation and the stated risk mitigation methods[59]. If all the elements of the SSW are in place, the Exercise Risk Assessment should list the hazards and controls in place. If

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[59] As per PAM 21.

parts of the SSW are missing, or do not cover the activity, then the additional hazards and their corresponding controls, must be added to the risk assessment in the standard format for SSW risk assessments as at Ch 3.

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

Dispensation Process

23.   A 'dispensation' is the process of recording and communicating a risk decision ie an acceptance of risk. Dispensations are intended to be temporary in order to facilitate a specific activity where it is assessed that the operational / training imperative is sufficient to justify it. Where an enduring need to conduct an activity outside the standard SSW is identified, a bespoke SSW shall be developed and certified by the appropriate authority. It is to be placed into the relevant policy, pamphlet and guidance which shall define the approved and authorised mitigations, and the level of command authority required to authorise a dispensation.

24.   Types of dispensation:

    a.   Mandated. Where an Army activity requires a known deviation from the standard SSW for which there is an alternative Approved Code of Practice (ACOP) which mandates specific higher authority before it can be authorised (e.g. Increased driving hours, use of non-UK BFA, etc).

    b.   28-day operational waiver (Safe to Operate).

    c.   Activity dispensation. Where an activity meets the threshold for the application of DH21, a dispensation to conduct that activity can only be authorised by a DH. Once the activity has been assessed, the operational (or training) imperative agreed and the activity declared ALARP and Tolerable by the appropriate DH, they may authorise an activity dispensation. Whilst the Activity Owner/Deliverer remains responsible for the risk and delivering the additional control measures, the DH is accountable for their decision in authorising the activity (through a dispensation). Where there is likely to be an enduring requirement to conduct the activity, the DH shall inform the appropriate authority who shall include it in the relevant policies or procedure for subsequent management by the OPCOM CoC under the mandated dispensation process.

25.   The AP authorising the dispensation shall:

    a.   Scrutinise all dispensation applications, obtaining SME advice as required.

    b.   Balance and appropriately evidence the risk, cost of mitigation and the operational/training imperative that has informed their decision-making process.

c.   Only authorise dispensations within the bounds of their authority.

d.   Maintain a register of all dispensation applications including the decided outcome ie (authorised/declined).

e.   Put in place assurance that control measures are implemented as planned.

f.   Continue to monitor and review dispensations and the agreed controls to ensure they are sufficient to control the risks.

g.   In the case of dispensations for routine or enduring activities where a standard set of controls can be implemented and can be considered 'good practice'; engage with the relevant policy owners (ACA&I) to consider having the controls included in the associated policy to negate future referral to the CoC/DH and thus permit management through the standard safety risk escalation process as appropriate.

26.   Format. The format and formality of a dispensation should be proportional to the risk but always provided in writing (electronic format). As a minimum a dispensation **shall** state[60]:

a.   The accountable and responsible Activity Owner and those responsible for the management of safety on their behalf.

b.   The residual risk score after a suitable and sufficient risk assessment and a heat map showing the inherent, residual and target risk.

c.   The agreed controls and sufficient evidence to demonstrate that risks have been controlled to ALARP and Tolerable.

d.   The time/place/activity for which the dispensation is authorised (the defined operating envelope).

e.   The named accountable and responsible person who has authorised the dispensation.

f.   A formal ALARP and Tolerable declaration by the accountable and responsible person.

27.   Further direction and guidance are contained within the Army Field Manual Training (AFM Trg). A practical aide memoire focussing on this 5 step risk assessment process is contained within Managing a Safe System booklet available on the Army Safety Centre | Defence Connect (mod.uk).

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[60] This can be adapted for Duty Holding 2021 (DH21).

Annex A to Chapter 2
ACSO 1200 – SEMS (First Revise)
Dated 1 Apr 24

Army Arduous Training (AAT) Criteria

Description	Criteria	Examples
Normal Activity <2 .5 PAL		
Routine ie in barracks Role specific physical training (PT) ITR 2 testing	Moderate excertion or higher over a short period Comparible with routine daily activity (including PT)	Level 1-3 Unit PT RFT(S)/SCR
Role specific fieldcraft or specialist training	Moderate excertion or higher over a short period Carrying ≤CEFO over short distances Adequate rest, nutrition and hydration	Fieldcraft and patrolling skills RA S2A gun trg RE Bridging tasks
Application of Army Arduous Training Policy = Arduous Activity – PAL ≥2 .5		
Military Selection		
Individual or Team endurance and navigation events covering various distances with a variety of loads.	Individual weighted load carry (≥40kgs) in all weather conditions Series of ITR 2 (+) events or physically demanding activities over a short period of time Physical and psychological fatigue due to cse length and career implications	All Arms Pre-Parachute Selection (P Coy). All Arms Cdo Cse (AACC) Ranger Assessment Cadre (RAC) RAPTC Selection SF Selection and Briefing Cse
Career Progression		

Events with physical and psychological componets over sustained periods of time	Series of physicaly demanding activities during fieldcraft (Adv to Contact followed by repetitive Pl Attacks) Individual physical and psychological fatigue due to cse length and career implications Individuals carrying loads ≥40kgs (in CEMO/CEFO) in all weather conditions Reduced rest, nutrition and hydration	Platoon Commanders' Battle Cse (PCBC), Platoon Sergeants' Battle Cse (PSBC), and Section Commanders' Battle Cse (SCBC) at the Infantry Battle School Anti-tanks, Mortars, and Machine Gun cses at the Combined Arms Manoeuvre School (CAMS)
Multi-Activity		
Team Events Team events with series of loaded Marches, assault cses and other military tasks within a short period of time	Individual loads ≥40kgs Multi-terrain and may include adverse weather conditions Where the SSW is owned by another nation Could include a number of activities; Swimming, Running, Cycling, Cross Country, Stretcher Race and Loaded March	Cambrian Patrol Overseas Military Race the Sun Lanyard Trophy or simliar Skills Competitions
Activities that may have a Cumulative Effect		
Cumulative effect of other factors on normal activities (≤ ITR 2).	Individuals have had limited sleep and/or nutrition/hydration prior to the event Involve several dismounted activities Such as within a short period of time followed by an endurance activity	ITR 2 level events during a field exercise DCC Field Training ie successive or rolling Sect/Pl Attacks or NavEx Cses Exercises ie Advance to Contact or loaded March) Selection Events
Application of Army Arduous Training Policy = Arduous Activity – PAL ≥2 .5		

Chapter 3

Safety Risk Management

Additional references:

A.   JSP 892 – Risk Management.
B.   JSP 892 Glossary and Acronyms.
C.   ACSO 1109 – Army Risk Policy.
D.   ACSO 4001 – Army Competent Inspectors and Advisors (ACA&I).

Introduction

1.   The chapter is intended to provide the direction and guidance for the CoC to 'operate safely' by balancing challenging activity against acceptable risk[61]. The nature of the Army's business requires its officers and soldiers to conduct activity that is inherently high risk. The Army has a legal and moral duty to ensure that all Army activity is conducted safely with risks controlled to ALARP. This DoC not only protects 'our people' but anyone who may be affected by our activities from unnecessary harm, it maintains our ability to generate credible fighting power whilst protecting the reputation of the Army.

2.   CGS is accountable and responsible for discharging the employer's legal responsibilities under the HSWA[62] on behalf of the Secretary of State (SoS). These employer's duties are further delegated by CGS to those with direct responsibility for managing Army activities within their Area of Responsibility (AoR). The Army Operating Model separates accountability and responsibility for the provision of capability that is 'safe to operate' from the accountability and responsibility to 'operate' safely':

    a.   Safe to Operate. The 4* HQ primarily through the 2* Directorates is accountable for equipment / capability and infrastructure that is 'safe to operate' including the provision of the DCOP, pamphlets and procedures that outline the approved SSW (see Ch. 2 for an SSW and Ch 5 for Environmental Management).

    b.   Operate Safely. The accountability and responsibility to 'operate safely' lies with the 'Operating' CoC – HLB Commanders and below ie User community that operates the In-Service capabilities/equipment.

3.   The majority of the key terms are contained within additional Ref B less for:

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[61] For simplicity Safety Risk Management (SRM) applies to 'Activity' and safety risks.
[62] The Health and Safety at Work etc Act 1974 (HSWA) provides the overarching legal duty upon employers. s2 of HSWA provides that "*It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees*". That duty extends to the maintenance of plant and systems of work; the handling, storage and transport of articles and substances; the provision of appropriate instruction, suitable training, and supervision; the maintenance of the place of work; and ensuring that the working environment, so far as is reasonably practicable, is safe. Subordinate legislation also mandates risk assessments and other precautions to eliminate or adequately control the risks. Similar obligations also exist under s4 HSWA to persons other than employees who might access our premises. This could include contractors and visitors. Deciding whether a risk is 'ALARP' thus lies at the heart of the UK health and safety system. Defence has interpreted these duties and set them out within JSP 375. Breaches of the HSWA will not, given our position as a Crown body, lead to criminal prosecution. Rather the Army may face Crown Censure by the HSE or other forms of enforcement action. In addition, common law obligations sit alongside the statutory obligations highlighted above. These are grounded in the principles of negligence, and potentially generate civil claims for damages for breach of DoC or Disciplinary action. If the accountable and responsible persons can demonstrate that they have reduced the risk to an ALARP standard, this should enable the MoD or accountable and responsible Commanders to defeat such claims.

a.   Activity (Risk) Owner. The Activity Owner is accountable and responsible for directing that an activity takes place and has the final decision on authorising that activity.

b.   Activity Deliverer. The Activity Deliverer is the person responsible for the safe planning and delivery of activity on behalf of the Activity Owner.

c.   Activity Lead. The Activity Leads are the persons responsible for the safe conduct of the task/elements of the task on behalf of the Activity Owner/Deliverer.

d.   Activity Participants. Anyone taking part in the activity.

e.   Operating Risk. Risk associated with routine activity that takes place within defined parameters as set out in an Operating Envelope, SSW or Safety Case. This assumes that in defining the operating parameters, consideration will have been given to likely risks and controls will have been imposed such that the activity will be ALARP. Operating risks are owned by the organisation undertaking routine activities and could manifest in the workforce, capability, training, sustainability, and interoperability.

f.   Operational Risk. Risk associated with the Armed Forces conducting military Operations and risk to military objectives, life, and reputation. Where risk must be taken to achieve an objective, particularly where this requires activity by a force element outside a defined operating parameter, this is operational risk. Operational risk is always owned by the operational CoC. The management of operational risk is covered in Army Doctrine Publications (ADP) Ops, Planning and is not a significant focus of this policy.

Part 1

Safety Risk Management

1.   Safety Risk Management (SRM) is a principles based, systematic approach to delivering DoC during missions or activities with clear roles and responsibilities.

Principles of SRM

2.   The four SRM principles apply all the time and in all circumstances. They enable SRM and are to be applied in all risk decision making. They are:

a.   Principle 1 – Anticipate and manage risk by planning. Risks are more easily controlled when identified early in the planning cycle. Commanders at all levels are to:

(1)   Integrate risk management into all levels of planning.

(2)   Dedicate time and resources to apply risk management effectively.

(3)   Consider all reasonably foreseeable hazards.

(4)   Avoid last minute changes to the activity without re-assessing the risks.

b.   Principle 2 – Accept risk when the benefits outweigh the costs. Commanders at all levels are to be 'Risk Aware' rather than 'Risk Averse' and are empowered to take considered and appropriate risk. The goal is not to eliminate risk, which is inherent in what we do, but to manage risk so that we can accomplish the mission or activity with minimal loss of operational capability. Commanders must consider the benefits and costs associated with risks to make informed decisions.

c.   Principle 3 – Accept no unnecessary risks. Only risks necessary to achieve the mission or activity are to be accepted once controlled to ALARP and deemed Tolerable. Commanders are to, wherever possible, implement the approved SSW to reduce risk to ALARP. Where the approved SSW is not applied in full, the appropriate authority shall only declare risks to be ALARP once they have formally considered the operational imperative, residual risk, and cost of further mitigation.

d.   Principle 4 – Make risk decisions at the right level. Risk management decisions are to be made by the Commander responsible for the conduct of the mission or activity. However, if the risks cannot be controlled to ALARP and within tolerability at this level, Commanders must escalate the risk decision to the most appropriate accountable and responsible authority.

SRM Roles and Responsibilities

3.   Effective SRM requires diligent discharge of roles and responsibilities. The Relationship between those responsible for activity and SMEs is at Fig 6.
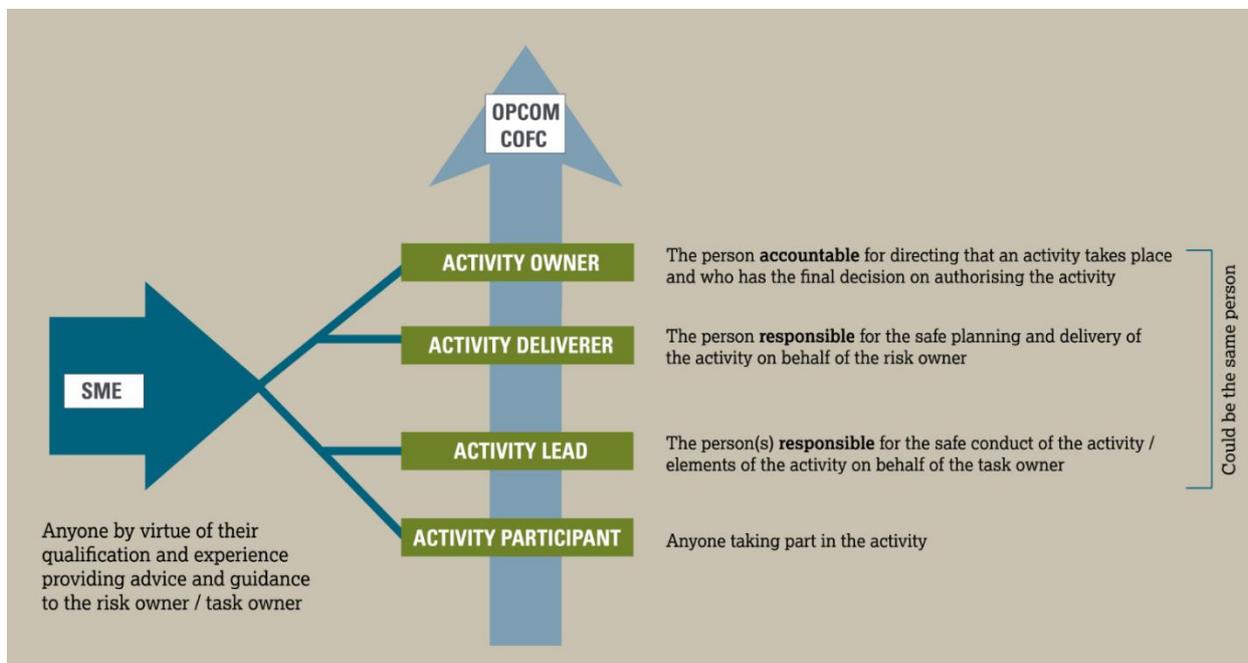

Figure 6. Relationship between those responsible for the activity and SMEs

4.   For every activity there must be a named and appointed 'Activity (Risk) Owner':

a.   The Activity Owner may appoint an 'Activity Deliverer' to plan and manage the activity on their behalf. The Activity Owner is accountable and responsible for directing that an activity takes place and has the final decision on authorising that activity. The Activity Owner shall:

(1)   Be personally accountable for the safety (DoC) of all personnel undertaking any activity that they have directed to take place or for which they have been appointed the Activity Owner by their higher CoC.

(2)   Manage risk in accordance with the SRM principles and process.

(3)   Only authorise activity within their pre-authorised risk threshold without seeking higher authority.

(4)   For any activity they authorise, be personally accountable for declaring that risk is mitigated to ALARP and can be tolerated[63].

(5)   Where appropriate and necessary, appoint suitably qualified and experienced persons (SQEP) as the Activity Deliverer to plan and deliver the activity on their behalf.

(6)   Oversee the activity and actions of any appointed Activity Deliverer.

(7)   Articulate the pre-authorised risk threshold for their subordinates.

(8)   Where required, escalate safety risks through their OPCOM CoC or to the appropriate DH.

(9)   Maintain a record of all risk decisions for 3 years (for auditing purposes).

(10)   Stop activity if it is no longer safe, ALARP or Tolerable.

(11)   Assure the SRM process for activities for which they are the Activity Owner.

(12)   Contribute to continuous learning by sharing lessons.

(13)   Where directed, support the occurrence investigation process.

(14)   Complete all SRM training as directed.

b.   The Activity Deliverer may, if appropriate, appoint an 'Activity Lead' who will oversee the conduct of the activity (or sub-elements of the activity) on their behalf. The Activity Deliverer is the person responsible for the safe planning and delivery of activity on behalf of the Activity Owner. The Activity Deliverer shall:

(1)   Apply the principles of SRM.

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[63] For low-risk activity conducted entirely within the defined SSW this declaration may be as simple as authorising the activity instructions. For more complex activity where the SSW is not applied in full this may require a formal declaration that they have assessed and agree risks to be ALARP.

(2) Be accountable to the risk owner for the safe planning and delivery of the activity.

(3) Be responsible for the DoC of all participants undertaking the activity on behalf of the Activity Owner.

(4) Be responsible for planning and conducting activity in accordance with the relevant Defence and Army policy, pamphlets and procedures that define the approved SSW[64].

(5) Implement and oversee all elements of the SRM process.

(6) Ensure a risk assessment is completed by a suitably qualified and/or competent (based on military judgment) person[65].

(7) Communicate with the Activity Owner highlighting any risks or deviations from the defined SSW for their consideration, decision, and direction.

(8) Be responsible for ensuring that hazards and the associated safety risk controls are clearly communicated to all Activity Leads and participants.

(9) Ensure all controls to mitigate risk are implemented as planned.

(10) Communicate with the CoC of all activity participants to ensure they are aware of the required start state and any intent to deviate from the defined SSW that may expose activity participants to increased risk[66].

(11) Conduct dynamic risk assessment and manage risk on behalf of the Activity Owner throughout the conduct of the activity.

(12) Stop activity if it is no longer safe, ALARP or Tolerable.

(13) Where they have been appointed, oversee the activity of the 'Activity Lead(s)' in order to provide guidance and direction as required.

(14) Report any occurrence on DURALS.

(15) Maintain all activity documentation for a period of 3 years.

(16) Contribute to continuous learning by sharing lessons.

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[64] On occasions where it is not possible to fully comply with policy and implement the defined SSW this requires additional scrutiny by the Activity Owner, where a deviation from the SSW creates a credible and foreseeable known activity risk this may require referral to the Duty Holder for approval.

[65] Until all personnel have received formal training in RAs and have been awarded the Army Risk Assessment qualification - Health and Safety at Work (Risk Assessor (Joint)) the CoC can nominate and record 'competent' personnel to complete RAs until the Trg gap has been closed. This **does not** give authority to **not complete** the RA Trg - this must be completed at the **earliest opportunity**.

[66] For routine activity this can be achieved through the publication of a calling notice, joining instruction or similar which directs that participation in the activity is to be authorised by the Commanding Officer and participation placed on unit part one orders. For more complex or high-risk activity this may require a formal dialog with the providing CoC and or the requirement for a fit to participate certificate to be signed.

(17)   Where directed, support the occurrence investigation process.

(18)   Complete all mandated SRM training as directed.

c.   Activity Lead. The Activity Leads are the persons responsible for the safe conduct of the task/elements of the task on behalf of the Activity Owner/Deliverer. The Activity Lead shall:

(1)   Apply the principles of SRM.

(2)   Implement the SRM process.

(3)   Plan and conduct activity for which they are responsible in accordance with the SSW as defined in policy.

(4)   Highlight safety risk or deviations from the SSW to the Activity Deliverer for their consideration.

(5)   Fulfil the duties of the Activity Deliverer if they are not present during the conduct of the activity.

(6)   Only plan and oversee activity within the bounds of their rank, qualifications, and experience.

(7)   Complete all SRM training as directed.

d.   Activity Participants. Anyone taking part in the activity shall:

(1)   Follow all safety notices and direction given to them by the Activity Owner, Activity Deliverer or Activity Lead.

(2)   Take responsibility for their own safety and the safety of others that may be affected by their actions/in-actions.

(3)   Challenge unsafe practices.

(4)   Report any occurrences to the Activity Deliverer/Activity Lead.

(5)   Complete all SRM training as directed.

e.   The responsibilities of the Activity Owner, Activity Deliverer and Activity Lead may be vested in the same person.

f.   There shall only ever be one accountable Activity Owner for the activity, although there may be several persons appointed with responsibilities for elements of the SRM and delivery of sub-elements of a larger activity.

g.   Subject Matter Experts (SME)[67]. Anyone specifically appointed as an authorised SME/competent authority or who, by virtue of their qualifications and experience, is providing advice and guidance to the **Activity Owner or Activity Deliverer** shall:

(1)   Only advise on matters for which they are current and competent within the limitations of their rank, qualifications, and experience.

(2)   Be accountable for the advice and guidance they provide.

(3)   Be responsible for providing accurate advice based on extant policy.

(4)   Provide reasonable risk mitigations for consideration by the by the Activity Owner based on their professional judgment and current good practice.

The SRM Process
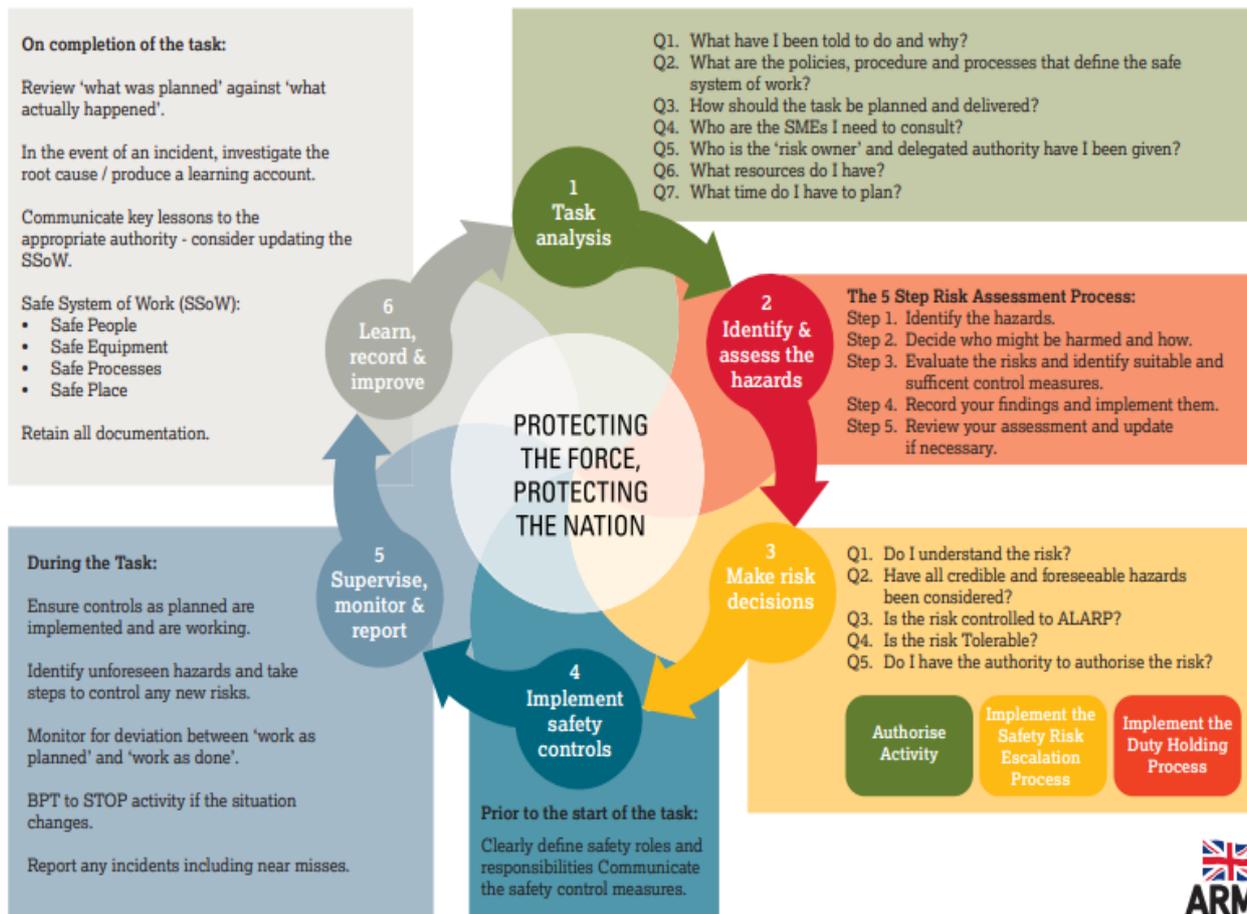
Figure 7. SRM 6 Phase Process

5.   The 6 Phase SRM Process. SRM is delivered in a systematic, considered process consisting of 6 phases as described below and shown graphically in Fig 7 with additional detail in Part 2. Applying this process will enable those responsible for activity and the management of risks to discharge their SRM obligations:

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[67] SMEs include appointments such as Comdts in LWC; Comd CTG, Comdt RSME, Comdt DCSp as well as Master Drivers, Division Trg and Advisory Team etc.

a.   SRM Phase 1 – Task Analysis. The Activity Deliverer (or the Activity Lead on their behalf) conducts their initial estimate for the task they have been assigned.

b.   SRM Phase 2 – Identify and Assess the Hazards. This involves the Activity Deliverer conducting a Risk Assessment. The output of Phase 2 is the identification of the residual risk rating (or risk score) for the activity as planned and is an important input into Phase 3 – the Activity Owner's decision.

c.   SRM Phase 3 – Make A Risk Decision. The Activity Owner is to consider sufficient evidence in making a judgment and then decides on their risk response.

d.   SRM Phase 4 – Implement Controls. Once authority to conduct the activity as planned has been given by the appropriate level of command, the agreed controls must be communicated and implemented in full and recorded[68].

e.   SRM Phase 5 – Supervise, Monitor and Report. The Activity Deliverer is to conduct the dynamic risk assessment process as part of their DoC obligations. Dynamic risk assessment differs from generic or specific risk assessments completed during activity planning. Dynamic risk assessment is the process used to supervise, monitor, change or stop activity even where it is being delivered.

f.   SRM Phase 6 – Learn, record, and improve. This phase follows the task and forms part of the OL process.

SRM Command and Control

6.   SRM Command and Control (C2). C2 for the management of safety risk is aligned to the OPCOM CoC responsible for the planning, coordination, and delivery of the activity, as follows:

a.   Single Unit activities. Where the Activity (Risk) Owner, Activity Deliverer and all participants are within the same unit under the direct command of the appointed Activity Owner, the activity is considered a single unit activity. The Commander appointed as the Activity Owner retains full accountability and responsibility for the DoC of all participants and the safe conduct of the activity.

b.   Multi-Unit Activities. Where any participants in an activity are not usually under direct command of the Activity Owner, including Individual Augmentees, it is a multi-unit activity. The Activity Owner and their OPCOM CoC are responsible for the planning and conduct of the activity and the CoC of the participants have the legal obligation under DoC to ensure the participants are sufficiently prepared to do so.

7.   Bespoke SRM C2. Where deemed appropriate due to the nature of the activity, a bespoke SRM / DH chain may be authorised by CoC (ODH) advised by AH Safety (A)[69].

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[68] Articulated in relevant documentation such as an activity or exercise instruction or OSW, a safety brief or where specifically mandated in policy, the RASP, RSD or JSATFA.
[69] For example: **Representative Sport.** The Army Sport Board (ASB), Directors of representative sport and appointed coaches etc may be better placed as the SRM chain for these activities rather than linked to the OPCOM CoC. For **AT Expeditions** that are Pan-Army or High Risk and/or Remote the OPCOM CoC may not be best suited to conduct SRM in which case a bespoke Expedition Director and Activity Owner should be appointed in consultation with the ASG-SC and advised by ATG(A).

This should be clearly articulated in any joining/administrative instructions and a bespoke letter of authority provided (where this is mandated in policy) for the specified task or activity.

8.   Army units / personnel permanently assigned outside the Army. Where for operational necessity Army organisations and units are permanently assigned OPCOM to another Front-Line Command, they are to follow their receiving OPCOM CoC SRM policy and process. In this case CGS shall:

    a.   Retain Full Command of Army Force Elements including a DoC.

    b.   Establish and maintain an MOU with the receiving FLC to include a declaration of the agreed operating envelope and the Army 'Operating Risk' DH chain that shall be applied if the receiving FLC wishes to employ Army Force Elements (FE) outside the agreed operating envelope.

    c.   Direct assurance activity as necessary to ensure the operating envelope is not being exceeded.

Safety Risk Authorisation

9.   In accordance with the fourth principle of SRM – make risk decisions at the right level; in deciding to authorise risk the appropriate authority shall apply the second and third principles of SRM (take risk where the benefit outweighs the cost and accept no unnecessary risk) and, in the vast majority of cases, the risk should be authorised (tolerated) and managed at the lowest practicable level in the CoC. Only the SofS can authorise tolerating risk that is NOT ALARP.

10.   The appropriate authority[70] shall only authorise risk that is necessary and has been controlled to ALARP. In making this assessment the appropriate authority shall review the risk, the cost of further mitigation and the operational (or training) imperative to conduct the activity. A decision not to treat risks shall only be made once any further mitigation is considered grossly disproportional to the benefit gained.

11.   By exception, where a Commander at any level is faced with an immediate requirement to tolerate a risk that is above their pre-authorised threshold and gaining higher authority is not practicable, they shall satisfy themselves that the operational (or training) imperative is sufficient to justify the risk and inform their high CoC at the earliest opportunity. In deciding to take the risk the Commander is personally accountable and responsible for their decision and must be able to justify it accordingly.

12.   Pre-authorised risk thresholds. The level at which the decision to tolerate risk can be made is directly proportional to the residual risk of an activity or where it has been mandated in policy for specific deviations from the approved SSW. The pre-authorised risk thresholds are linked to level of command which is the level of risk a Commander is authorised to Tolerate without seeking additional scrutiny or authority, so long as it is within the risk appetite of their superior Commander and they themselves are satisfied that

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[70] Typically, the level of authority is linked to the level of command in accordance with the pre-authorised risk thresholds, where a Commander is faced with an immediate requirement to take a risk that is above their authorised threshold, they shall inform their high CoC at the earliest opportunity in deciding to take the risk the Commander is personally accountable and responsible.

risk is ALARP and Tolerable. Whilst guidance parameters shown in Table 4, this is CoC decision based on competency with any pre-authorisation recorded on Part 1 Orders.

Level of Risk	Level at which Risk should be authorised	Level at which DH21 for Known Activity Risk can be owned and tolerated
Very High (Scoring 25)	CGS (4*)	Extreme Operational requirement only – SDH/Defence
High (Scoring 20)	Army Command[71]	ODH
Medium to High (Scoring between 15 and 19)	Command (2*)	
Medium (Scoring between 10 and 14)	OF5/1*	DDH
Low to Medium (Scoring between 7 and 9)	OF4 (Includes COs, CIs, COs (OF3) of independent sub units with delegated powers)	Not applicable – DH21 does not apply to low activity risks and can be held by the CO/OF4
Low (Scoring between 4 and 6)	OF3 (Unit 2IC, XOs and subunit Comd)	
Very Low (Scoring between 1 and 3)	LCpl – Capt	

Table 4. Risk Authority Table

13. Changes to pre-authorised risk levels. For non-DH holding risk where appropriate and local context dictates, a superior Commander may:

   a. Reduce the pre-authorised threshold for their subordinate Commanders. This should be clearly articulated in the superior Commander's risk appetite and instructions given to the subordinate Commander(s) in writing.

   b. Increase the pre-authorised threshold for their subordinate Commanders up to but not beyond their own pre-authorised threshold. This shall be:

      (1) Communicated in writing.

      (2) Be bounded by time and activity.

      (3) On the rare occasions that DH applies, DH accountability and responsibility cannot be delegated.

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[71] Army Command is Comd HC, CFA and Comd JAC.

14.   A dispensation may also be used to delegate authority subject to specific controls being in place and when specific criteria are met. This should be recorded usually on Part 1 Orders or similar. Finally, if an SSW cannot be achieved then the authoriser should consider if DH21 applies.

15.   Do I have the authority to authorise the risk? The authority to authorise risk rests with the CoC for all non-aviation activities[72]. The decision to authorise risk responsibility being dependent on the activity owner (risk holder's) competence noting that Comds may wish to apply their own controls on who is authorised to approve activities providing the levels do not exceed their own pre-authorised risk thresholds.

16.   Risk escalation. If the residual risk is above the level that a commander or activity owner can hold then they must escalate it through their CoC. The next level in the CofC must review the risk assessment to satisfy themselves that they understand the risk, that all credible and foreseeable hazards have been considered and that the risk is ALARP and Tolerable. If further risk reduction measures can be applied (e.g., by allocating additional resources, using different equipment, adjusting controls) then they must be applied until the risk is considered ALARP, prior to the activity being authorised.

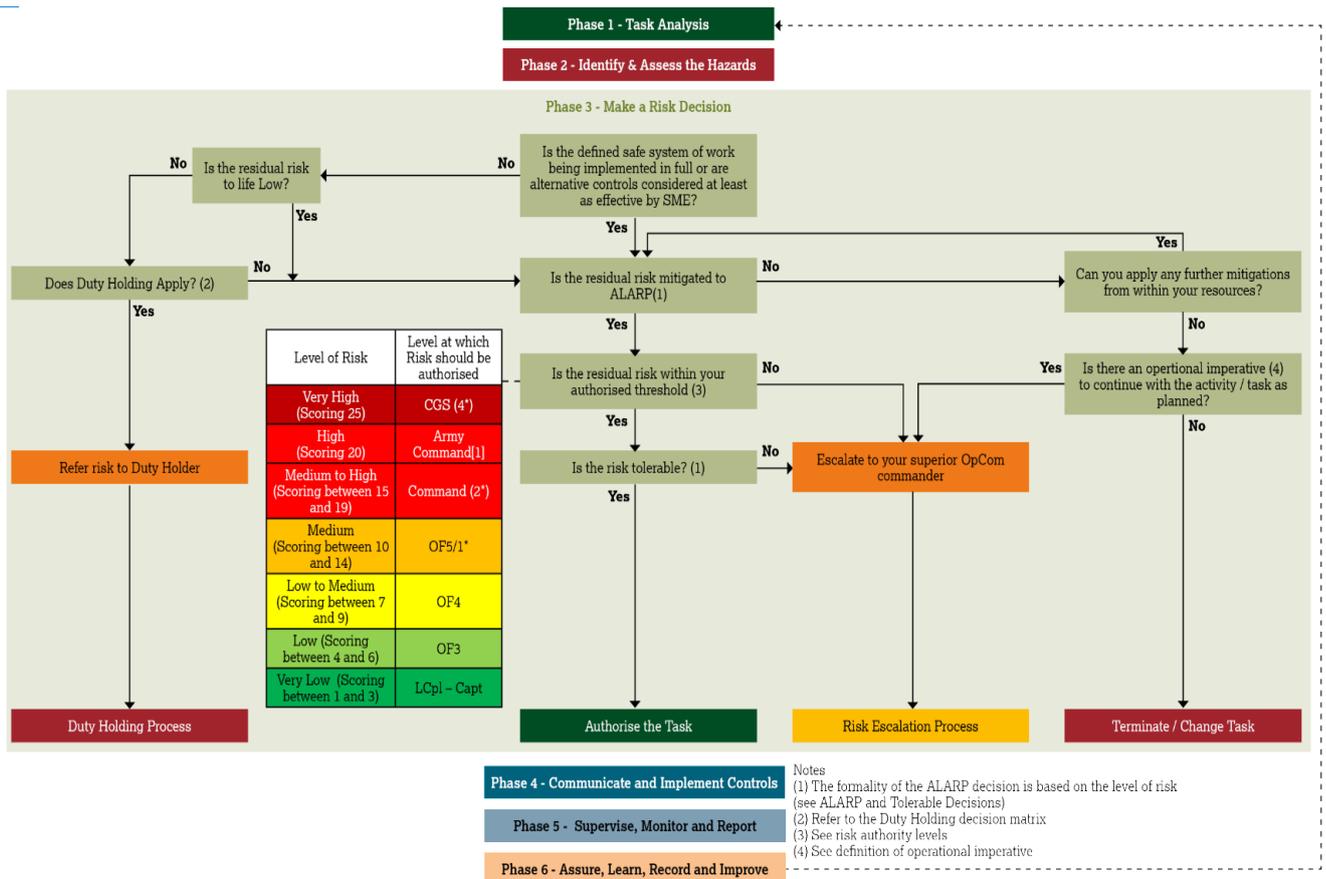17.   The Army Risk Decision Flow Diagram at Fig 8 is a useful tool as outlined below.

Figure 8. Army Risk Decision Flow Diagram

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[72] Aviation risk management must be conducted in accordance with MAA Regulations.

SRM in the Operational Context

18.   Introduction. DoC applies universally including on operations. Both the operational CoC and the FGen CoC have responsibilities under DoC as outlined in this section. In principle, the Single Service (sS) Generating FE for operations retains accountability and responsibility for ensuring that the FE/capability provided to the operational Commander is 'safe to operate' and has the means to 'operate safely' in the context for which they have been force generated, throughout the deployment. Thus, the FGen CoC retains the responsibility for Operating Risk and the operational CoC are responsible for Operational Risk.

19.   Roles and responsibilities of the FGen and operational / employing CoC. Both the CoC FGen FE and the CoC employing those FE as an **operational commander** have legal DoC responsibilities which are:

a.   The operational / employing CoC. When employing FE and capability not usually from within their organisation/unit for the purposes of a specified activity or operational deployment, the Employing or Operational CoC, receiving the FE **shall**:

(1)   Define and communicate the expected operational requirements to the FGen CoC in terms of Theatre Entry Standards for Workforce, Equipment, Training, Sustainability, and Interoperability (x-WETSI), effects and tasks to be achieved.

(2)   Where appropriate, approve the suitability of the Force Requirements or capabilities provided by the FGen CoC for a given task or activity[73].

(3)   Understand the operating and operational risks associated with the use of FGen FE being transferred to the Operational CoC for a specific task or activity.

(4)   Ensure that the FGen CoC are made aware of the risks associated with the planned activity and where necessary/practical, involve the FGen CoC in the risk management process.

(5)   Provide information, instruction, and training to FGen FE on operational risks, hazards, and their associated controls. This may be conducted as part of pre-deployment briefs and training, Reception, Staging, Onward Movement and Integration (RSOI) or through additional in-theatre training.

(6)   Establish liaison arrangements for co-operation and co-ordination with all those responsible for the provision of operational safety during the conduct of activity[74].

(7)   Provide the necessary operational oversight to assure FGen FEs have the necessary permissions, KSE and capabilities to complete assigned tasks within pre-defined controls[75].

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[73] AJP 3.13: The Joint Force Commander (JF Comd) ensures that necessary capabilities are provided during the force generation process, the provision of support to personnel arriving at the Joint Operating Area (JOA) and coordinates the efforts of all other organisations in the RSOI process, including National Support Elements (NSEs). AJP 3.13. The JF Comd is responsible for "Approving CCs CONOPS, including Force Requirements, DOA, and the corresponding intra-theatre LOC".
[74] This should be broader than pure FP (SHEF) compliance and be a holistic approach to FP.
[75] Controls include ROE, FP controls, delegated permissions etc as well as op safety / regulatory compliance.

(8)   Routinely employ assigned FE within the limits of the agreed **operating envelope**. Where practical and time permits, inform the FGen CoC of any intention to operate out with the agreed operating envelope. Continued use of FEs beyond a set operating envelope is subject to review through a formalised risk management process.

b.   The FGen CoC. When assigning FE to another organisation for the purposes of conducting a specific activity / operational deployment, the FGen CoC providing FE **shall**:

(1)   Ensure all FE meet the agreed Theatre Entry Standards in terms of WETSI and as directed by the receiving Operational CoC.

(2)   Ensure all FE are able to 'operate safely' in that they have been suitably trained to undertake the tasks for which they have been assigned and they have SSW providing the means to 'safely operate' in the deployment context.

(3)   Declare the **operating envelope** in terms of caveats or limitations for the FE being assigned to the Operational CoC.

(4)   Inform the Operational CoC of any risks or limitations in the employment of the FEs and the associated controls that may impact the Operational CoC employing the FE.

(5)   Identify and appoint the operating Activity Owners responsible to the Operational CoC for the FE.

(6)   Maintain co-ordination and communication links with the Operational CoC as appropriate and necessary to manage change and/or emerging risks.

c.   Defining the operating envelope. The format and content of the operating envelope should be proportional to the complexity of the Force Package/FE being Generated, the context of the deployment and the risks involved with the inclusion of an **operating capability certificate** as part of the FGenO which shall include:

(1)   Formation/FE.

(2)   Deployment/Rotation Period.

(3)   Deployment location.

(4)   Declaration that the assigned FE(s) have met the appropriate deployment standards[76].

(5)   Identification of DH responsibilities.

(6)   Identification of operational risks arising from the FGen or preparation process.

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[76] Across Workforce, Equipment, Training, Sustainment, and Interoperability (WETSI).

(7)   Confirmation of the operating envelope in terms of caveats/limitations or operational deficiencies.

20.   Defence Engagement (DE) / Short Term Training Team (STTT). Where an DE / STTT and some OTX activity which is at Medium / High risk; remote locations or involves an armed deployment, as in overseas operations, the coordinating HQ for the activity is to:

a.   Set the Safe Operating Envelope.

b.   Set the Theatre Entry Standards.

c.   Conduct assurance on those activity risks that endure longer than 28 days or as directed by the Formation Commander.

21.   Application of SRM in the operational context. Army SRM is applicable to operations where appropriate with the responsibilities resting with the operational commander at all times. For Army sponsored operational activity this is through either the Standing Joint Headquarters (UK) or the Land Operations Centre (LOC) as shown in Fig 9:
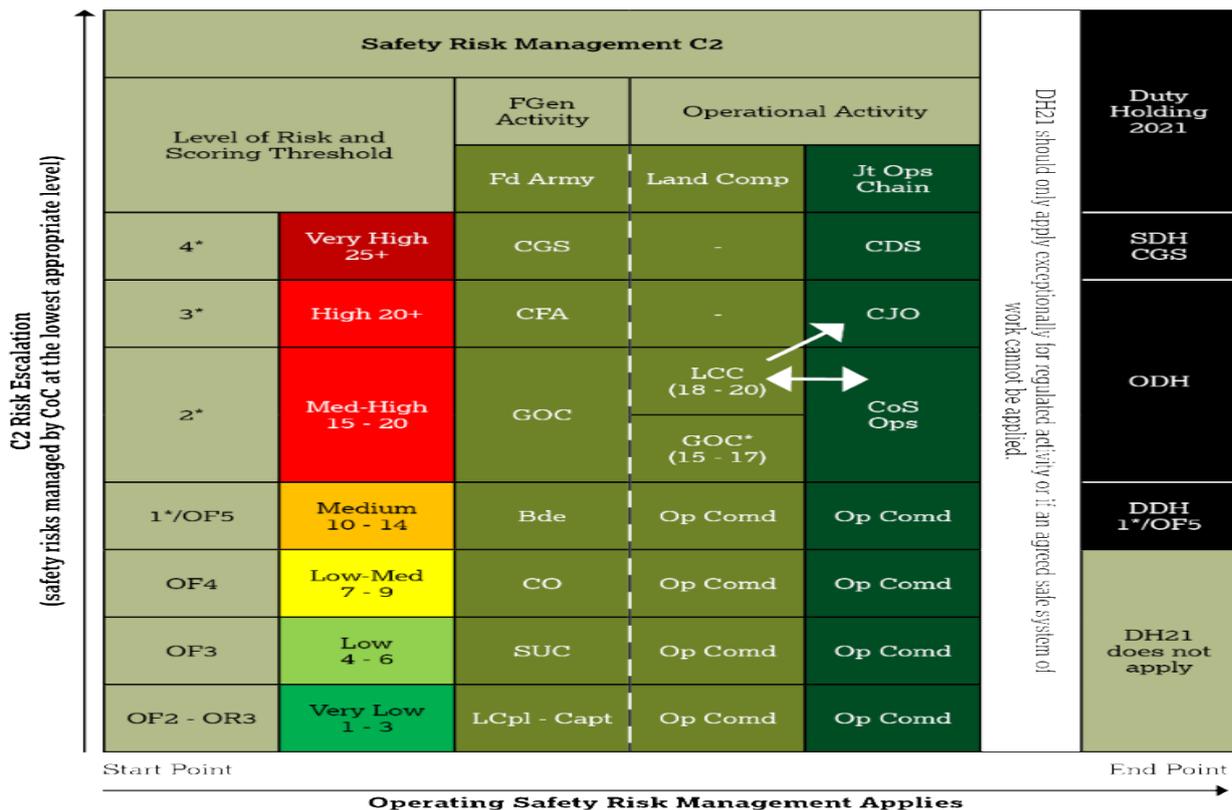
Figure 9. FGen and Operational Activity Risk Management Guide

Part 2

The SRM Process

22.   Part 2 provides the guidance and advice with which to discharge the direction in Part 1 and follows the 6 Phase SRM Process illustrated at Fig 7.

SRM Phase 1 - Mission / Task Analysis

23.   The Activity Deliverer (or the Activity Lead on their behalf) conducts their initial estimate for the task they have been assigned. Key questions should include:

a.   What have I been told to do and why? If required use the 7 questions, 3 column format or another analysis tool.

b.   What are the policies, procedures and processes that define the SSW? Examples of reference documents that may assist with SSW for the task/s being analysed include Defence regs, JSPs, ACSOs, Publications ie PAM 21 etc.

c.   How should the task be planned and delivered?

d.   Who are the SMEs that I need to consult? These will be specific to the task and/or generalist for FP (SHEF) / Force Health Protection.

e.   Who is the Activity Owner and what delegated authority have I been given?

f.   What resources do I have?

g.   How much time do I have to plan the task? Should I use the Time Critical   or Deliberate SRM process? Whilst a failure to plan in advance does not justify the use of the Time Critical SRM process (otherwise known as a dynamic risk assessment - see Phase 5) as Principle 1 of SRM directs that risk should be anticipated and managed by planning, providing a checklist for Commanders.

h.   There are occasions when there will be insufficient time to follow the detailed and deliberate SRM process before conducting an activity. Therefore, Time Critical SRM is intended for short notice activities, routine low risk tasks or where a last minute but unforeseen change to the activity plan has occurred. Usually, the Time Critical SRM process relies on mental analysis rather than a written problem-solving process as such it is more susceptible to heuristics and bias. Those conducting the Time Critical SRM process should seek input from SMEs wherever possible in order to inform their decision making.

i.   The steps of the Time Critical SRM process are outlined below:

(1)   Assess (your situation and your potential for error):

(a)   Where am I?

(b)   What is going on?

(c)   What could happen next?

(d)   Who is the 'risk owner'?

(2)   Balance Resources (to prevent and contain errors):

(a)   What are my options?

(b)   How best could I use my resources to minimise safety risk and still achieve the desired task/mission?

(3)   Communicate (risks and intentions):

(a)   Who needs to know?

(b)   Who can help?

(c)   How can I ensure all are aware? And complying?

(4)   Do and Debrief (take the necessary action, monitor, and supervise the activity for change, once appropriate INFORM your high CoC.

(a)   Was the task achieved?

(b)   Did my actions reduce the risk?

(c)   Have I reported any occurrences?

(d)   What can we learn?

SRM Phase 2 - Identify and Assess the Hazards

24.   Purpose. A Risk Assessment is a tool to support the CoC manage risk. Use it to:

a.   Establish that all elements of the SSW; persons, equipment, practice, and place are implemented as defined and approved in policies.

b.   Identify any other hazards not already addressed by the SSW, their corresponding risk and suitable control measures.

c.   Identify any elements of the SSW that are missing, hence alternatives that are considered by the relevant SME to be at least as effective.

d.   Provide the evidence for a risk decision to be taken at the appropriate level.

25.   Types. The output of Phase 2 is the residual risk rating (or risk score) for the activity and is an important input into Phase 3 – the Activity Owner's decision. Types of Risk Assessments are:

a.   Generic. Generic Risk Assessments can be used where similar activities are undertaken or repeated, as in training units. Careful scrutiny is required to ensure

that variables, such as location, conditions, or experience levels, are adequately considered.

b.   Specific. Task/Activity or Person Specific Risk Assessment. When assessing a risk all influencing factors must be considered. This process allows specific parameters such as the ability or limitations of an individual or the environmental conditions expected at a particular time to be effectively assessed.

c.   Dynamic. This allows for immediate safety assessments to be made without implementing the written risk assessment process e.g., the decision to tackle a small fire, a task with obvious safety risks which would increase if delayed (and/or when there is a compelling operational or training imperative to conduct activity and time is short). This is to be used where any delay increases the risk of harm, it is not to be used purely to save time or avoid additional work. It may also be used as an initial step in identifying the need for a written assessment process.

26.   Format. In order to standardise the risk assessment process the Army uses the Army Form 5010 Risk Assessment (AF5010) unless policy directs a specific format such as the JSATFA or AF5010C for Army Cadets.

Phase 3 – Make Risk Decisions

27.   What is the Risk Decision? The appointed Activity Owner needs to consider all the available evidence in order to make a judgment on and decide on their risk response whether to:

a.   Authorise the activity as planned; or

b.   Further treat the risks within own resources; or

c.   Implement the safety risk escalation process; or

d.   Implement the DH21 process; or

e.   Change the parameters of the activity to reduce risk or

f.   Terminate the activity.

28.   Do I understand the risk? In making the risk decision the Activity Owner should consider the following questions:

a.   Have all credible and foreseeable hazards been considered?

b.   Is the SSW being applied in full?

c.   Where the SSW is not being implemented in full are alternative controls considered as least as effective by appropriate SME?

d.   Is the risk controlled to ALARP?

    e.   Is the risk Tolerable?

    f.   Do I have the authority to authorise the risk?

29.   Have all credible and foreseeable hazards been considered? The activity owner or Comd must review the Risk Assessment to confirm that all the credible and foreseeable risks have been considered. If the activity is something that they are familiar with and understand well through training and experience, then this may be as simple as reading the risk assessment. If the activity is more complicated or is less familiar to them then they should consider consulting with subject matter experts either from within the unit or by reaching into Bde or Fmn staff.

Is the risk controlled to ALARP[77]?
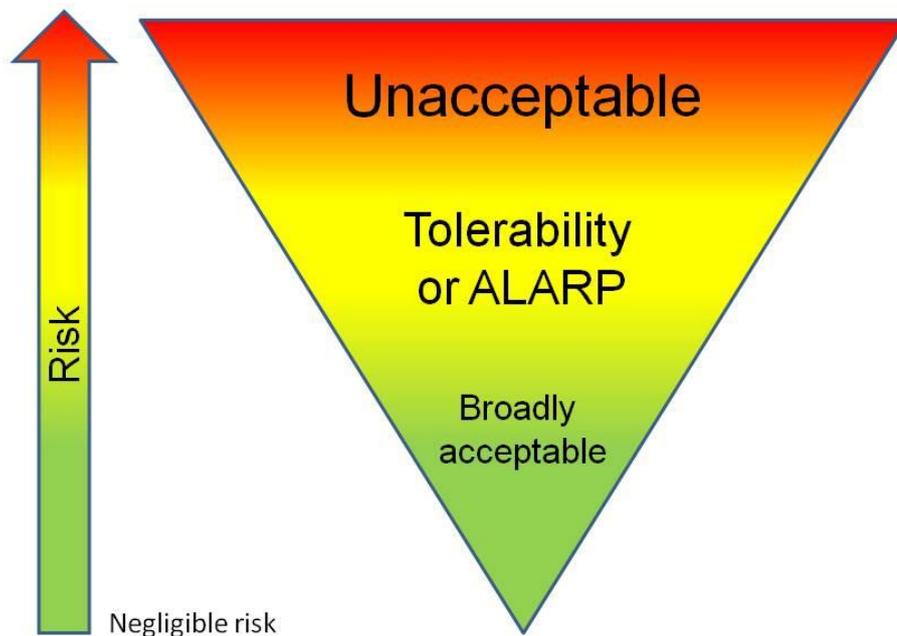
Figure 10. Level of Risk and Scale of Tolerance

30.   When starting to consider ALARP, first consider the controls in place to mitigate the hazards. Many will be in place by ensuring that the relevant SSW as prescribed by relevant policy and procedure is applied. Examples include ratios of safety supervisors to participants, drivers' hours, range standing orders etc. These controls have been designed to minimise the risk to personnel and when implemented, apply a hierarchy of risk controls. The most effective controls are applied first with the final line of Defence being

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[77] https://www.hse.gov.uk/managing/theory/alarpglance.htm. HSE expands: ALARP describes the level to which we expect to see risks controlled. In essence, making sure a risk has been reduced ALARP is about weighing the risk against the sacrifice needed to further reduce it. The decision is weighted in favour of health and safety because the presumption is that the commander should implement the risk reduction measure. To avoid having to make this sacrifice, the commander must be able to show that it would be grossly disproportionate to the benefits of risk reduction that would be achieved. Thus, the process is not one of balancing the costs and benefits of measures but, rather, of.

administrative controls and PPE[78]. Fig 10 outlines the Level of Risk and Scale of Tolerance.

31.   There will be additional hazards such as environmental (heat, cold, precipitation, terrain etc) or experiential (level of experience of participants) that must also be considered in the risk assessment. Are the controls to manage those hazards also effective and complete? Key here is establishing whether there is anything else that could reasonably be done to reduce the risk further. When making that judgement, the availability of other resources from higher formation and flanks should be considered to ensure that all reasonable avenues have been pursued.

32.   Of course, many decisions about risk and the controls that achieve ALARP are not so obvious. Factors come into play such as ongoing costs set against remote chances of one-off events, or daily expense and supervision time required to ensure that service personnel use and /or wear appropriate personal protective equipment (PPE). There is no simple formula for computing what is ALARP - it requires judgment.

33.   Is the Risk Tolerable? Above a certain level, a risk is regarded as unacceptable and cannot be justified on any grounds, except in extraordinary circumstances (the '*Intolerable*' level). At the lowest level, a risk can be regarded as broadly acceptable when the risk becomes truly negligible in comparison with other risks that the individual or society runs (the '*Acceptable*' region[79]*).*

34.   Conduct of realistic military training. The HSE recognises that the MoD must be able to conduct realistic training to mitigate the risks associated with combat operations[80]. Between the acceptable and intolerable regions an activity can take place provided that the associated risks have been made ALARP and are judged to be '*Tolerable*'. It is appropriate that the tolerability cursor is set at different levels through the training progression, with very low tolerance of risk early in the cycle or when inexperienced troops are employed (when the gains are not worth the potential risks) but increasing as experience and confidence grow and training becomes more demanding and realistic in preparation for the realities of operations ('training as we fight').

35.   Evidencing an ALARP and Tolerable position. Whilst the activity risks shall be the primary focus of this decision process, the appropriate authority may also need to consider and balance the activity risks against other forms of risk as defined in the Army's Risk Policy**[81]**. The greater the residual risk following the application of controls and mitigations, the stronger and more formal the ALARP argument should be. For activities with a residual risk that is High (ie authorised by 2*), the argument must be written down and evidenced. It should show what additional controls were considered and rejected including the argument for them not being practicable to apply. Minor deviations from the defined SSW that do not increase the activity risks can usually be confirmed as ALARP by applying and recording a command judgment after a sufficient and detailed risk assessment has been completed by a competent person[82]. Fig 11 shows how the ALARP argument can be evidenced by

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[78] See Pg 78, Fig. 12.
[79] Adopting measures except where they are ruled out because they involve grossly disproportionate sacrifices. Extreme examples might be: (1) To spend £1m to prevent five staff suffering bruised knees is obviously grossly disproportionate; BUT (2) To spend £1m to prevent a major explosion capable of killing 150 people is obviously proportionate.
[80] HSE's Position on Realistic Training in the Military.
[81] ACSO 1109 - Army Risk Policy.
[82] Noting that in some cases policy requires higher authority even for minor deviations from the SSW irrespective of the activity risk.

demonstrating compliance with good practice (SSW), sufficient risk assessment and (where necessary) evidence of risk reduction options.
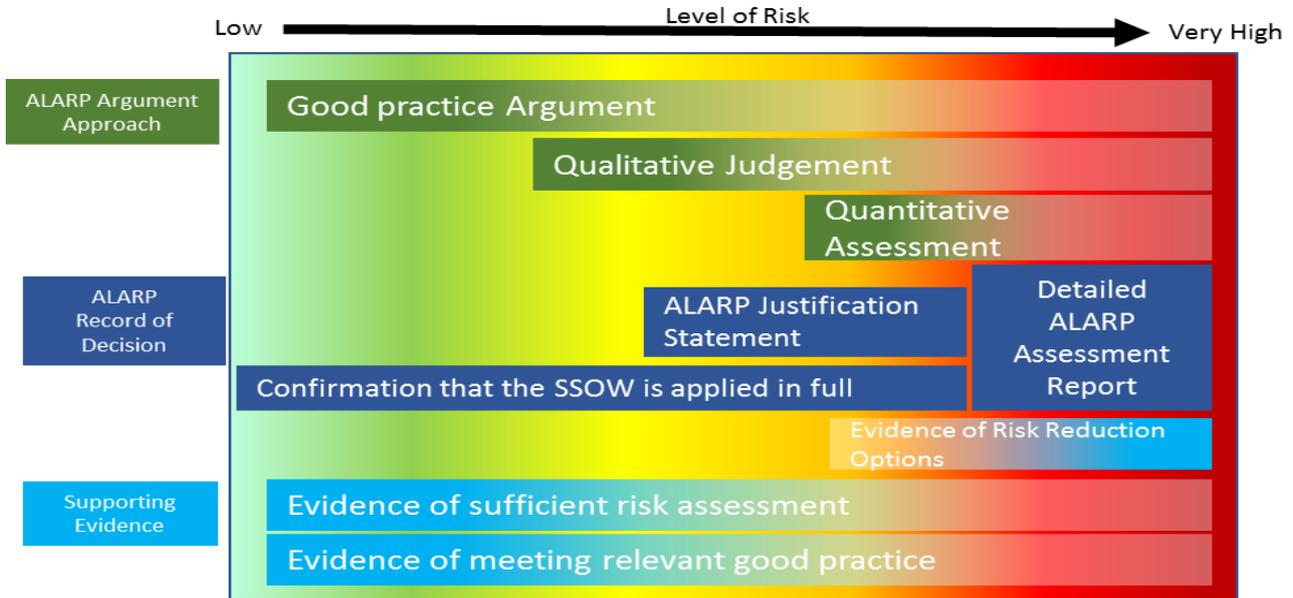
Figure 11. Guidance on ALARP argument approach, record and supporting evidence

SRM Phase 4 - Implement Controls

36.   Once authority to conduct the activity as planned has been given by the appropriate level of command, the agreed controls must be communicated and implemented in full. Part of this process is the requirement to articulate who is accountable and responsible for the management of safety risk and who has the immediate DoC responsibility. The specific roles and responsibilities along with the safety risk control measures must be clearly detailed in the activity documentation; typically, OSW, an administration instruction / safety brief or where specifically mandated in policy in the RASP, RSD, JSATFA etc.

SRM Phase 5 - Supervise, Monitor and Report

37.   This is conducted during the delivery of the task and is often considered the dynamic risk assessment during the activity (see Phase 1 Time Critical SRM). It relies on mental analysis rather than a written problem-solving process. The person responsible for the delivery of the activity (typically the Activity Deliverer but could be delegated to an Activity Lead) has a DoC (responsibility) to conduct **dynamic risk assessment**. Noting that dynamic risk assessment differs from the generic or specific risk assessment completed during the planning of an activity; dynamic risk assessment refers to the process used to supervise, monitor, change or stop activity even when it is being delivered in accordance with the authorised plan. Typically, dynamic risk assessment is about assurance of controls. The responsible person conducting the dynamic risk assessment should:

   a.   Ensure controls as planned are implemented and are working to maintain safety.

b.   Identify new (unforeseen hazards) and take necessary measures to reassess and control these new risks.

c.   Monitor for deviations between 'work as planned' and 'work as done'.

d.   Be prepared to **<u>Stop</u>** the activity when they are no longer able to confirm that the risk is ALARP or within their authorised level of Tolerability.

e.   In the event that a risk is realised and results in an occurrence (including a near miss) ensure the occurrence is dealt with in accordance with policy; noting that this may require the termination or pause of the activity in order to enable a reassessment of the risks to others.

f.   Ensure any occurrences are reported in accordance with the Army occurrence reporting process.

g.   Any on the spot control measures implemented, can then potentially be added to the risk assessment to ALARP future risk on that type of activity.

SRM Phase 6 - Learn, record, and improve

38.   This phase is fed throughout the activity and conducted on conclusion. It forms part of the OL. The key activities include:

a.   An assessment of 'what was planned' and 'what actually happened' - were the applied controls effective in managing the risk?

b.   In the event of an occurrence; investigate the root cause and complete an Army Investigation Report as required**.**

c.   Forward key lessons / successful mitigations / general observations to the CoC and appropriate authority for them to consider including in policy (this is an opportunity to update the SSW) and disseminate learning for the benefit of others ie publishing the PXR etc.

d.   Retain all documentation for the activity including the OSW, administration instruction, risk assessments and any decision to amend the original plan as a result of the dynamic risk assessment and the lessons learned for a period of 3 years in accordance with Army records policy.

SECTION 2 – DO

INTRODUCTION

1.   Effective safety management allows the Army to do safely what is required and needs to do in the interests of Defence. Safety Risk Management (SRM) will normally involve several stakeholders, and all are to understand their FP (SHEF) obligations; identifying, prioritising, managing, and controlling the risks they are responsible for. Clear direction and appropriate supervision must be provided to meet those obligations. The Risk Assessment is an essential element of effective risk management by those directing and conducting hazardous activities; it is also a legal requirement. All Commanders and Line Managers must:

    a.   Identify FP (SHEF) risk profile:

        (1)   Conduct Risk Assessments to identify what could cause harm in the workplace, who it could harm and how, and what needs to be done to manage the risk.

        (2)   Identify what the priorities are and identify the biggest risks.

        (3)   Organise activities to deliver FP (SHEF) plans and aims to:

            (a)   Involve all levels in the CoC and communicate so that everyone is clear on FP (SHEF) intent and their role in your plan.

            (b)   Foster and develop positive attitudes and behaviours – a strong and just safety culture is critical.

            (c)   Provide adequate resources, including competent advice where needed.

    b.   Implement the plan:

        (1)   Decide on the preventive and protective measures needed and put them in place.

        (2)   Provide the right tools and equipment to do the job and keep them maintained.

        (3)   Train and instruct to ensure everyone are competent to carry out their work.

        (4)   Supervise to make sure that arrangements are followed.

    c.   Demand FP (SHEF) rigour from the CoC – they are the eyes and ears for Risk Assessment on the ground and must demonstrate leadership in following your intent.

    d.   Unified Approach. As part of the Army's FP (SHEF) continuous improvement pathway setting the conditions for a coherent and consistent approach across the

force, all units and fmns are encouraged to adopt and adapt the Army COP through the FP (SHEF) Framework.

Chapter 4

Risk Identification and Management

Additional reference:

A.   JSP 892 - Risk Management.

Introduction

1.   It is a legal requirement to conduct a risk assessment for work-related activities[83]. The degree of rigour applied to the risk assessment for an activity is to be proportionate to the impact of failure. A risk assessment shall be completed for any Army activity where there is a credible safety risk (activities considered to have a negligible risk do not require a formal risk assessment but should still be subject to dynamic risk assessment).

2.   Operating risk[84]. Risk associated with activity that takes place within defined parameters as set out in an operating envelope, safety case or SSW. This assumes that in defining the operating parameters, consideration will have been given to likely risks and mandated controls will have been imposed such that the activity will be ALARP. Operating risks will usually be owned by FULLCOMD chain and for activities that cannot achieve a SSW, the Army DH21 chain. CJO may own some operating risks through exercising their OPCOM DoC.

3.   Operational risk. If the operational CoC needs to step outside of the operating risk envelope for operational necessity, they may do so on their own authority taking operational risk. Where time allows, they should refer the matter to the relevant military command DH.

Part 1

1.   All formal Risk Assessments shall:

a.   Be completed by a suitably qualified or competent person(s). The risk assessor appointed to produce the risk assessment will:

(1)   Hold the appropriate Army Risk Assessment qualification - Health and Safety at Work (Risk Assessor (Joint)) or similar.

(2)   Have been appointed by the CoC[85].

(3)   Have knowledge of the activity, and how and in what environment the activity is to be conducted.

(4)   Assess all reasonably foreseeable hazards and consider the findings of other related risk assessments that may impact on the activity e.g. Fire Safety Risk Assessment, DSEAR Assessment.

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[83] JSP 815 - Defence Safety Management System (SMS).
[84] ACSO 1109 - Army Risk Policy includes detailed guidance for financial and reputational risk impact and likelihood.
[85] Confirm the currency of any necessary qualifications, as mandated for the activity for competence in accordance with the specific policy and pamphlets determining the SSW.

(5)   Be authorised and signed by the accountable Activity Owner or by a person specifically delegated responsible on their behalf.

(6)   All risk assessments[86] must be retained for a minimum period of 3 years[87] which is the responsibility of the activity owners.

b.   Generic Risk Assessments are best used for locations / places such as sites, ranges or other Trg areas not activity and shall:

(1)   Be used to establish the base line of what minimum controls must be in place for an activity to be conducted (with an activity RA as a checklist to ensure that this is the case) and;

(2)   Only where the activity is conducted under the same conditions for which a standard set of mitigations can be employed and,

(3)   Only where the Activity Owner is satisfied that the control measures identified and implemented, adequately reduce the risk to ALARP. This is irrespective of cultural, physical, or mental differences of those undertaking the activity and the different environments in which the activity is conducted.

(4)   Be reviewed annually or;

(a)   When there has been a change in the conditions for which the risk assessment was produced.

(b)   The Activity Owner has changed.

(c)   As a result of any occurrence.

(5)   **Must** be signed off by the appropriate Activity Owner iaw with the pre-authorised risk thresholds. If the Activity Owner is the individual who conducts the risk assessment, then the risk assessment must then be signed off by the next higher person in the Activity Owner's CoC.

c.   Specific Risk Assessments are employed when conducting an activity as a 'one-off' and therefore the hazards are specific to that activity. In addition to covering bespoke military training activity, this will include events such as a families' day or charity events etc and shall:

(1)   Be included as part of the activity administrative/exercise instruction[88].

(2)   Cover the entirety of the planned activity including for example travel to and from the main activity.

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[86] Using an AF5010 unless the policy and procedures for the specific activity mandate an alternative risk assessment proforma.
[87] In accordance with JSP 375, Volume 1, Chapter 39 - Retention of Records.
[88] For low-risk activity inclusion of a safety brief in the activity instruction that includes the controls to manage risks may be sufficient and acceptable.

(3)   Be completed on the appropriate risk assessment proforma e.g. AF5010[89].

(4)   Be signed off by the appropriate Activity Owner iaw with the **pre-authorised risk thresholds**.

d.   Dynamic Risk Assessments[90] are live documents and should be reviewed dynamically throughout the activity to ensure that and shall:

(1)   The control measures are implemented and remain in.

(2)   The SSW remains intact.

(3)   In an operational context, with potentially time and preparation constraints, a dynamic risk assessment by the Comd will take primacy.

2.   Risk Assessment Review. All risk assessments, together with the resultant control measure instructions, are living documents. Reviews must be conducted using a risk-based approach:

a.   High risk (biannual).

b.   Medium risk (annual).

c.   Low risk (biennial).

d.   If there is reason to suspect that the risk assessment is no longer valid.

e.   If there are significant changes to the activity.

f.   Immediately following any occurrence.

g.   If there are changes in policy that affect the activity.

h.   If training is being delivered by a foreign nation and not to the appropriate NATO Standard.

Risk Escalation

3.   Aim and purpose. Safety Risk escalation is a tool to facilitate DoC, managerial oversight, assurance of risk decision making and risk management by the CoC. The responsibility and accountability for the management of risk remains with the Activity Owner directing that the activity takes place unless there is an agreement by the higher CoC to accept a transfer of the risk[91]. The purpose of safety risk escalation is for:

a.   Activity Owners to request from their higher CoC, additional resources or changes in the demands placed upon them when they are either unable to apply the

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[89] Unless the policy and procedures for the specific activity mandate an alternative risk assessment proforma.
[90] The Health and Safety Executive note that many military accidents are the result of last-minute changes to activity where the impact of such changes have not been fully thought through.
[91] Risk escalation is not automatically a transfer of risk.

SSW in full or are unable to apply alternatives to the SSW considered as least as effective in mitigating risk to ALARP.

b.   The Higher CoC to assure that the SSW is in place prior to the conduct of a higher-risk activity; or direct that activity is terminated where it is not considered ALARP or Tolerable.

4.   Application of safety risk escalation. For certain activity risks escalation enables the fourth principle of SRM - the decision to authorise risk shall be taken at the appropriate level with access to the appropriate SME advice. Safety risks[92] **shall** be escalated through the OPCOM CoC by subordinate Activity Owners when:

a.   Having conducted a RA the Activity Owner considers the level of **residual risk to be greater than their authorised threshold** and therefore requires higher authority to proceed with the activity – **Request for Authority**.

a.   The residual risk is within the pre-authorised threshold of the Activity Owner who considers the risk to be ALARP, but policy directs (mandates) that **dispensation is required** prior to conducting the activity or to authorise even minor deviations from the approved SSW – **Mandated Dispensation**.

b.   An Activity Owner is unable to apply the defined SSW or alternatives to the defined SSW that are considered by SME to be equally as effective within the limitations of their own resources and thus the **activity is not currently ALARP** – **Request for additional resources or changes in the demands of the activity**.

5.   Safety risk escalation process. Whilst the physical risk and therefore control will always remain at the activity level, risk acceptance escalation is initiated by a subordinate Commander and the Commander receiving the escalation is their immediate One Up:

a.   Initiating the risk escalation. The format, formality and method for escalating risks should be proportional to the risk and complexity of the activity. As a minimum the Activity Owner should include:

(1)   A brief description of the task/activity.

(2)   Summary of the risks including the risk assessment and heat map as appropriate and the residual risk score of the activity as planned.

(3)   The reason for risk being escalated:

(a)   Authority to conduct activity above pre-authorised threshold.

(b)   Request for additional resources or changes in the demands of the task.

(c)   Application for mandated dispensation as required by the appropriate policy or doctrine including minor deviation from the SSW.

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[92] When the risk does not breech the threshold for the application of DH.

(4)   Confirmation of compliance with the relevant policy, procedures, ACOP and pamphlets which define the SSW or where elements of the defined SSW are missing, confirm the alternative controls that have been implemented are considered at least as effective by appropriate SME.

(5)   The additional resources/change to the activity being requested to enable the risk owner to control risk to ALARP.

b.   Actions by the Superior Commander receiving the risk escalation. The superior Commander (in consultation with SME as appropriate) should consider the submission from the subordinate Activity Owner and:

(1)   Provide additional resources to enable the subordinate Activity Owner to apply the SSW in full; or

(2)   Change the demands of the task placed on the subordinate Activity Owner so that the SSW can be applied in full; or

(3)   Scrutinise and confirm that the SSW is applied in full or that alternatives are equally as effective and the current residual risk is therefore ALARP and can be tolerated by the subordinate Activity Owner; or,

(4)   Direct that the activity as planned is 'Terminated' as it is either not ALARP or the current risk cannot be tolerated as there is no justified operational (or training) imperative to continue with the task, at the current risk level and additional resources cannot be provided to treat the risk further; or

(5)   Escalate the risk to their higher CoC for their further consideration and action; or

(6)   Where relevant and appropriate implement the DH process and refer the risk to the appropriate DH (DDH or ODH) for their consideration.

6.   Army Approach. The Army approach to DH is through DH21 and is only applicable under specific circumstances with DHs appointed at 3 levels.

a.   The Service Chief is the SDH and nominates:

b.   ODHs (ODH) who in turn nominate:

c.   DDHs (DDH)

7.   Applicability. Noting that that DoC is a commander's legal and moral obligation and that DH21 should only apply exceptionally on a risk-basis. DH provides additional management arrangements to enhance the DoC and is applicable for uniquely military activity where:

a.   When mandated by the regulator.

b.   An SSW cannot be delivered in full.

   c.   As Directed by the SDH[93] or ODH[94].

8.   Non applicability: DH21 does not apply for the following activities which all be conducted under SRM[95]:

   a.   Army recruiting.

   b.   Army Phase 1, 2 and 3 trg.

   c.   Army multi-unit activities.

   d.   Army Sport.

   e.   Army Adventure Training.

   f.   Army Cadets[96].

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[93] SDH is CGS.
[94] ODHs are Comd HC, CFA, Comd JAC and with DDHs being their subordinate 1*/OF5 formation Operating Group Commanders.
[95] As agreed at the Army Safety Committee 2018.
[96] Army Cadets must be conducted iaw the ACSO 1210.

Part 2

9.   The Hierarchy of Risk Controls describes the different controls available to mitigate risk and include Elimination, Substitution, Engineering Controls, Administrative Controls, Personal Protective Equipment (PPE) which are illustrated with their relative levels of effectiveness in Fig 12.
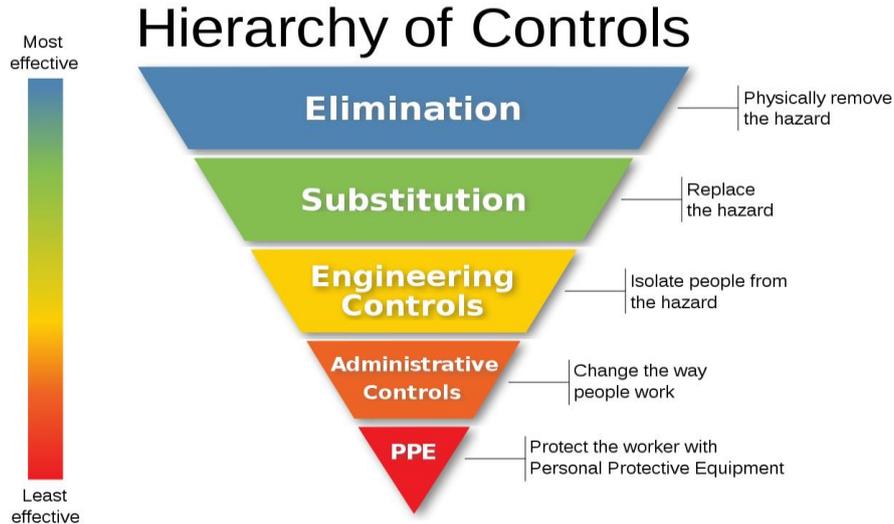
Figure 12. Hierarchy of Controls

10.   Risk Assessment. The Army uses the methodology contained within JSP 375, Ch 8 as the basis for its risk assessment process supported by the Likelihood and Impact Table 5 below:

Likelihood		Definition		Impact/Severity	
5	Highly Probable (Almost Certain)	Is expected to occur in most circumstances		5	Multiple fatalities or permanent life changing injuries
4	Probable	Will occur at some time or in most circumstances		4	A single death or multiple life-threatening injuries
3	Possible	Fairly likely to occur at some time or in some circumstances		3	A single life changing injury or multiple injuries which have a short-term impact on normal or quality of life
2	Unlikely	Is unlikely to occur, but could occur at sometime		2	Multiple injuries requiring first aid
1	Remote/Rare	May only occur in exceptional circumstances		1	An injury requiring first aid

Table 5. Likelihood and Impact Criteria Table

Annex A to ACSO 1200 –
ASEMS (First Revise), Ch 4
Dated 1 Apr 24

Duty Holding 2021 (DH21)

Additional references:

A.   JSP 815 Vol 2 Element 5 - Supervising, Contracting and Control Activities.
B.   Generic Duty Holding Course.

Introduction

1.   Duty Holding (DH). DH is a Defence mechanism that is intended to supplement DoC in specific circumstances. Importantly DH does not alter the legal responsibility to ensure the DoC of our personnel, nor does it imply any additional legal responsibility; however, the DH can be held personally accountable for their decisions. Therefore, DoC and DH places **accountability** and **responsibility** on a named and trained individual (the DH) to formally consider, agree and assure that the activity risks associated with military activity is controlled to ALARP and can be Tolerated. The Defence approach is covered in additional Ref A less for aviation where it is mandated in Defence Regulations.

2.   Coherence of DH across defence boundaries. In order to ensure compliance and coherence across Defence some inherently high-risk and specialist activities require the standing appointment of an ODH and Lead DDH within the Army. Lead Army DDH is a specific thing to ensure compliance and coherence across Defence some inherently high-risk and specialist activities require the standing appointment of an ODH and Lead DDH within the Army.

Roles and Responsibilities

3.   In accordance with Defence DH policy, there will be three levels of DH21:

a.   **SDH**. This will always be CGS[97] and is the level at which ultimate RA2 is held. The SDH will direct which activities are subject to DH21 and the standards that are to be applied. Safety risk may be escalated from the ODH to the SDH as required; in some instances, significant risks may need to be held by the SDH, in others, the SDH may escalate the risk to SofS. The SDH **shall:**

(1)   Direct the Army's approach to the application of DH21.

(2)   Escalate to the SofS DH21 activity risks that cannot be controlled to ALARP and Tolerable within the Army means.

(3)   Direct that all subordinate DHs receive appropriate training and have sufficient resources to deliver their roles and responsibilities as DHs.

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[97] Less for Army personnel within 3 Cdo Bde where it remains within the RN DH construct (ie to 1SL).

(4)   Where appointed as the Activity Owner be personally accountable and responsible for confirming DH21 activity risks are controlled to ALARP and Tolerable.

(5)   Accept the escalation of risks from subordinate DHs where there is an operational (or training) imperative to conduct the activity which subordinate DH are unable to control within their means or for which the risk is above their authorised threshold.

(6)   Formally appoint subordinate ODHs.

b.   **Operating Duty Holder (ODH)**. This is the level at which CGS's intent and direction is applied within AoRs. They are appointed by the SDH and is vested with 3*/2* HLB level (Comd HC, CFA and Comd JAC). The ODH provides the safety management link between the SDH and those routinely conducting the activity at the delivery level. The ODH will conduct 2LOD to ensure compliance with CGS's intent and direction, set standards and may direct resources to mitigate safety risk as required. Risk ownership may be escalated from the DDH to the ODH as required and the ODH may escalate risk to the SDH. ODHs are expected to provide an annual report to the SDH on how DH safety risks are being managed and controlled in their AoR as part of their Commands AAR. The ODH shall:

(1)   Chair an annual FP (SHEF) board to review DH21 activity conducted within their AoR. FP (SHEF) boards must be attended by subordinate DDHs and should include relevant updates from DH-facing SMEs.

(2)   Complete the DSA GDHC[98] and DH21 discussion with Hd Safety (A) prior to appointment as an ODH or, by exception, within the first 3 months of assuming the role.

(3)   Identify, monitor, and assure all DH21 activity risks within their AoR.

(4)   Where appointed as the DH balance risk with resources over time.

(5)   Agree and own DH21 activity risk dispensations as appropriate.

(6)   Where appointed as the DH be personally accountable and responsible for confirming DH21 activity risks has been controlled to ALARP and Tolerable.

(7)   Accept the escalation of risks from subordinate DDHs where subordinate DDHs are unable to control the risk within their means or for which the risk is above their authorised threshold.

(8)   Engage with DH-Facing organisations / persons as required to treat risk either held by subordinate Activity Owners or on behalf of the SDH as required.

(9)   Refer risks to the SDH when they are unable to make an ALARP and Tolerability statement or where ALARP, but the residual risks is above the pre-authorised threshold.

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[98] DSA Generic Duty Holding Cse (GDHC) at the Defence Academy.

(10) Where appointed as the lead ODH for Army FE deployed on operations – provide the initial PoC (through the LOC) for the Operational CoC to raise requests to conduct activity outside the declared operating envelope.

(11) Terminate any activity within their AoR that they do not consider to be ALARP and Tolerable.

(12) Oversee, monitor, and supervise the activities of subordinate DDHs.

(13) Maintain cross-HLB and cross-TLB communication links with other ODHs in order to share issues, risks and mitigations that have pan-Army or pan-Defence implications.

(14) Only authorise risk within their pre-authorised risk threshold.

(15) Formally appoint subordinate DDHs.

c.   **Delivery Duty Holder (DDH)**. This is the level at which CGS's intent and the safety standards to be applied are delivered by the appointed DDH at the 1*/OF5 Level. When DH21 applies, the DDH shall:

(1)   Complete the GDHC and Army DH21 training prior to appointment as a DDH or, by exception, within the first 3 months of assuming the role.

(2)   Identify, monitor, and assure activities that pose a known activity risks within their AoR.

(3)   Where appointed as the DDH balance risk with resources over time.

(4)   Agree and own DH21 activity risk dispensations as appropriate.

(5)   Where appointed as the DDH be personally accountable and responsible for confirming risk has been controlled to ALARP and Tolerable.

(6)   Accept the escalation of risks from subordinate Activity Owners where there is an operational (or training) imperative to conduct the activity, but it is being delivered outside of the agreed SSW and meets the criteria for the application of DH21.

(7)   Engage with authorised SME, Lead DH, DH-facing organisations / persons as required to assess and treat risk on behalf of subordinate risk owners or on behalf of the ODH as required.

(8)   Refer risks to the ODH when they are unable to make an ALARP and Tolerability statement or where they are deemed ALARP, but the residual risks is above the pre-authorised threshold.

(9)   Terminate any activity within their AoR that they do not consider to be ALARP and Tolerable.

(10) Maintain cross-formation and cross-TLB communication links with other DDH in order to share issues, risks and mitigations that have pan-Army implications.

(11) Only authorise risk within their pre-authorised risk threshold.

4. Training. All appointed Army appointed as DH are to undertake the Generic Duty Holders Cse (GDHC) at additional Ref B within 3 months of their appointment. Confirmation of completion being given to the SDH for ODHs and to respective ODHs for DDHs by the appointees.

Structure

5. The DH21 Chains typically mirror the OPCOM CoC with the Army DH21 Chain (ADH21C) using directed letters of appointment. These emanate from CGS as the SDH to the Army Commanders as ODHs who are empowered to then appoint DDHs as appropriate. Where an appointment has both general DH21 accountability and responsibility as well as specific accountability and responsibilities under 'Air Duty Holding' or where they perform a cross TLB DH function for mandated activities they are annotated accordingly.

6. DH21 Decision Support:

a. It is Mandated by the regulator[99].

b. The ***operational imperative*** requires the operating CoC to ***conduct an inherently high risk and uniquely military activity[100] outside or contrary to an approved SSW, which presents a credible and foreseeable known activity risk*** [101] typically because of one or more of the following:

(1) The operational (or training) imperative demands of the task or the context in which it is being conducted make it impossible for operators to comply with the approved SSW in full and still achieve the required operational output.

(2) An inability by the current Activity Owner to evidence and declare that risks are ALARP because they lack access to appropriate evidence to adequately assess the risk or the leavers to control the risks are not owned or cannot be influenced directly by the current Activity Owner' or the operating CoC.

(3) There is no approved SSW already documented or defined in policy for the activity or equipment being used. Typically, because the activity requires the use of 'new' equipment that does not have a safety case and associated

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[99] This is separate to the application of Army DH whereby some defence activities require management through a specified DH construct. For example Aviation is to be regulated in accordance with Air Duty Holding policy see RA 1020 Aviation Duty Holder and Aviation Duty Holder-Facing Organisations – roles and responsibilities.

[100] Activities known to have inherently high risk that are governed with strict adherence to the SSW include but are not limited to live firing, Maritime activity, Military Diving, Military Parachuting, and operating complex military platforms.

[101] A residual known activity risk assessed to be low ie scores less than 9 on the Army risk matrix is considered Tolerable and the decision that a risk is ALARP can be based purely on the judgement and experience of Commanding Officers (OF4) without the need to refer to the Duty Holding process.

documentation (e.g. experimentation or use of non-UK issue /endorsed equipment).

(4)   The proposed activity requires equipment / capability to be operated outside of its defined Safe Operating Envelope[102] and the hazards may not have been considered within the capabilities safety case – this will usually result in an **equipment risk referral**.

7.   **Lead DDH**. Should it be required, a Lead DDHs provides a single Army focal point for pan-Defence activity. The Lead DDH is accountable and responsible for ensuring the activity is conducted safely within the Army providing the link between all Army operators conducting the activity and those who ensure the capability is 'safe to operate' particularly where the capability is owned by another FLC. Lead DDHs have the authority to stop the activity if they deem it unsafe irrespective of the OPCOM CoC. Lead DDH are to be consulted by DDHs when they intend to breach the SSW.

8.   Additionally, Defence requires specific activities to have an appointed Lead DDH which are shown at Table 6:

Activity[103]	Lead Army ODH	Lead Army DDH	Lead Service[104]
Army Military Diving	Comd Field Army	Comd 8 Engr Bde	RN
EOD and Similar Activity	Comd Field Army	Comd 29 EOD&S Group	Army
Army Maritime Activity	Comd Field Army	Comd 104 Log Bde	RN
Army Military Parachuting	Comd Field Army	Comd 16 (AA) Bde	RAF
Army SUAVs	Comd JAC	Comd Surv Gp	Army

Table 6. Coherence of DH across Defence Boundaries

Applicability

9.   DH21 is the Army's internal management tool that supports the Army CoC as an enhancement to the Safety Risk Escalation Process in certain circumstances by providing additional management controls in delivering its legal responsibilities. DH21 allows for the referral and where necessary rapid escalation of activity risk (particularly those associated with hazards created by 'safe to operate' issues) through the DH chain to enable resolution.

10.   CGS directs the DH21 will only be applied when the activity must be conducted in the interests of Defence and the safety risks exceed the acceptable tolerance levels in order to meet DoC obligations such that one or more elements of an SSW cannot be achieved within routine ALARP and Tolerable parameters iaw with Army SRM as outlined in Ch. 3.

11.   Application of DH21 in a non-operational context. DH21 will apply **IF** mandated by the regulator **OR** in certain circumstances when personnel are required to conduct a uniquely military activity outside of the agreed SSW and arrangements are considered

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[102] The Safe Operating Envelope refers to the set of limits and conditions within which an equipment/capability must be operated to ensure conformance with the Safety Case.
[103] Avn DH is delivered through JAC iaw with MAA.
[104] Lead Service responsible for policy and procedure.

inadequate for managing a credible and foreseeable risk **AND** there is a training or operational imperative for the activity to continue. DH21 Decision Support sequence should be followed at Fig 13:
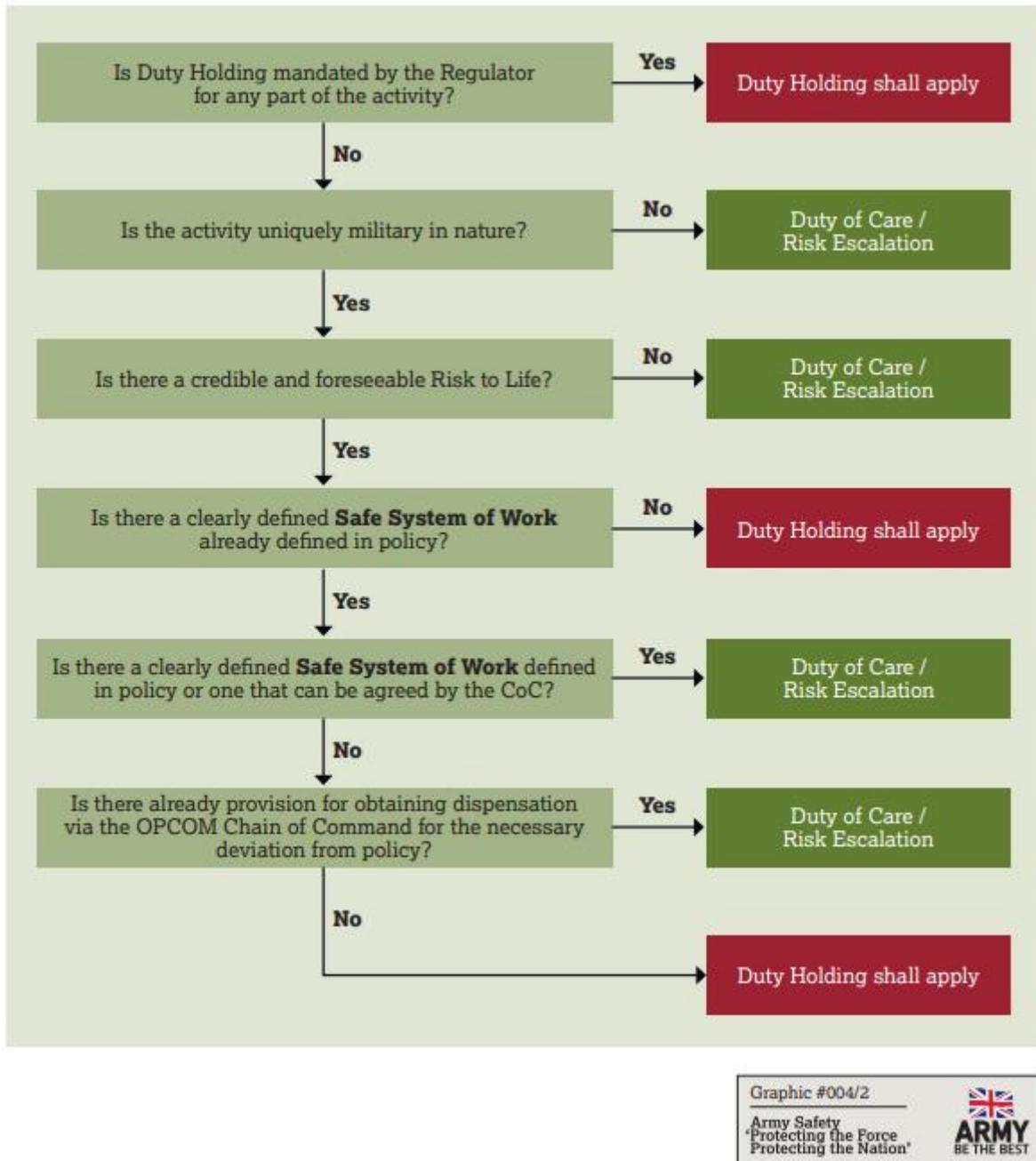
Figure 13. DH21 Decision Support Diagram

12.   If this is not that case, the activity should cease. If an activity cannot be conducted within an SSW the principal question **is there a training imperative for this activity to continue**? If the answer is no, then the activity should cease.

13.   However, if the answer is yes then then those with RA2 responsibilities for the management of the safety risk when conducting the activity must be clearly identified and provided with a mechanism for its effective resourcing and escalation of ownership when required. Or the activity must cease.

14. DH21 risk referral process. DH21 risk referral can be initiated bottom-up (by the activity owner) or top-down (by a Regulator, DH facing organisation etc). The processes are similar and are detailed below in Fig 14.
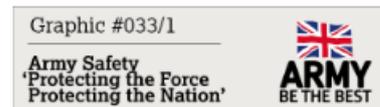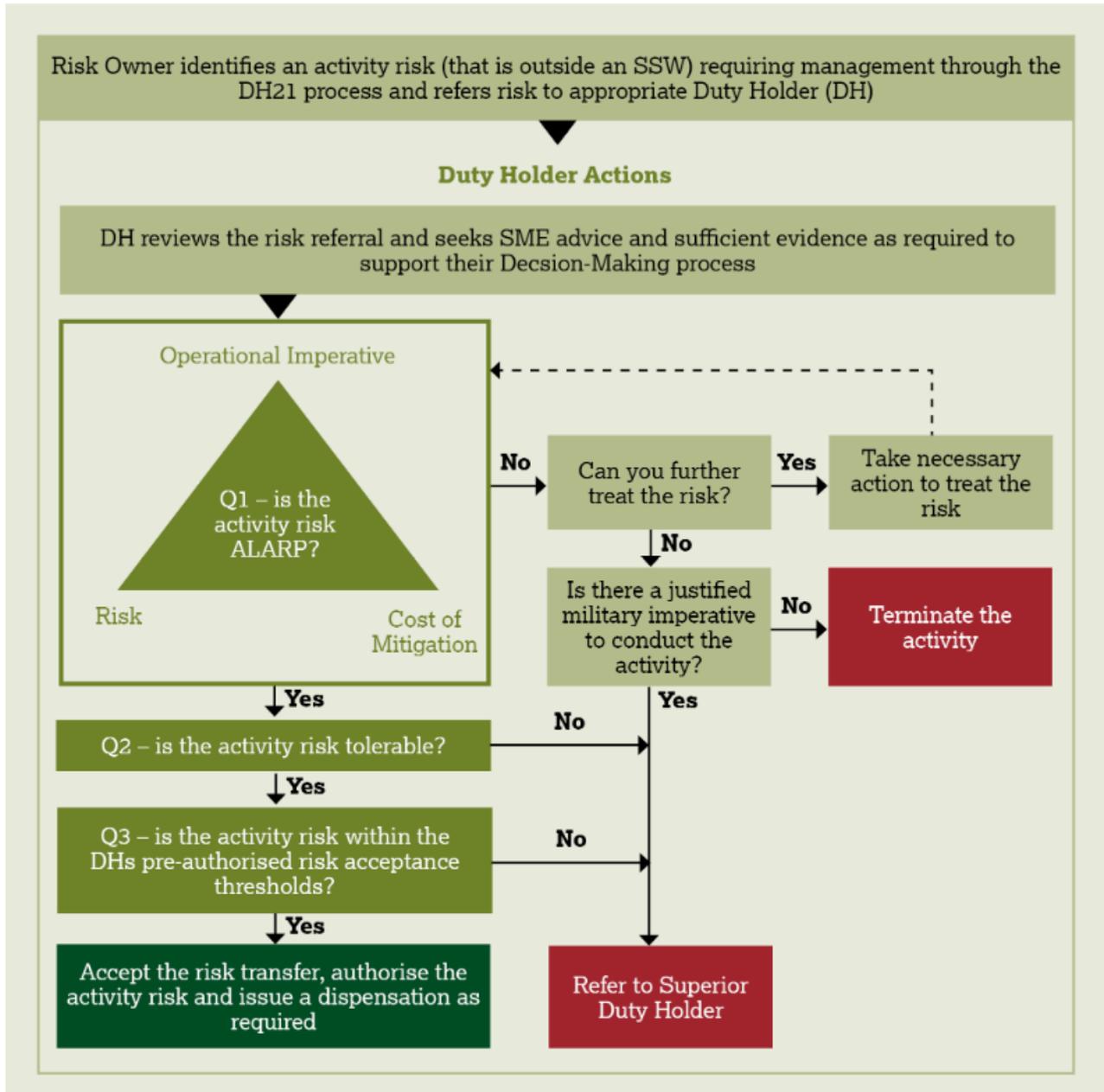
Figure 14. DH's actions on receipt of a DH21 risk referral

15. Experimentation and Trials. The DDH for Army Experimentation and Trials is the Comd ETG, LWC.

16.　DH-Facing. Those organisations that provide safe equipment and platforms (e.g. DE&S), infrastructure (e.g. DIO) or persons who provide other support required by the DH in mitigating DH21 activity risks are designated as DH-facing. A DH-facing organisation/person is responsible for assuring that equipment, platforms and infrastructure are 'safe to operate' by providing evidence in SECRs or equivalent safety documentation allowing the maintenance of an SSW for Army Activity. Where these assurances or services cannot be provided this will impact on the DH's ability to ensure activity risks are both ALARP and Tolerable. The DH-facing organisation must ensure that the DH is informed immediately. The roles and responsibilities of designated DH-facing persons / organisations are contained in Ch 3.

17.　Top Down. Typically initiated by an external DH-facing organisation or by the Regulator. The process for a top-down initiated risk referral is shown in Fig 15.

Incident or investigation results in a risk referral by the regulator questioning the safety of an activity or capability being ALARP

The regulator informs the appropriate authority(1) in Army HQ

Actions by appropriate Army Authority

If there is a significant activity risk, issue an eSN to temporarily stop the activity

Competent authority conducts an initial triage of the risk referral obtaining SME advice as appropriate

Is there an urgent and justifiable operational imperative to continue with the activity

↓Yes　　　　　　　　　　　↓No

Are there any immediate risk mitigations that can be implemented to reduce the risk?　　Temporarily terminate the non-operational activity

↓Yes　　　　↓No

Update the eSN with additional risk mitigations　　SDH / ODH Issues a 28 day waiver to continue with the activity at risk

Competent authority conducts a detailed risk assessment

Can the risk be immediately controlled to ALARP and tolerable within Army resources?

↓No　　　　　　　　　　　　↓Yes

Is there justifiable operational imperative to continue with the activity despite it not being ALARP and Tolerable?　　No →　Suspended non-operational activity until mitigation can be implemented　　Treat the risks and update the SSW as required

↓Yes

Risk is referred to SofS, Operational waivers issued by the SDH / ODH as required　　　　　Competent authority formally declares the risk is now ALARP and tolerable

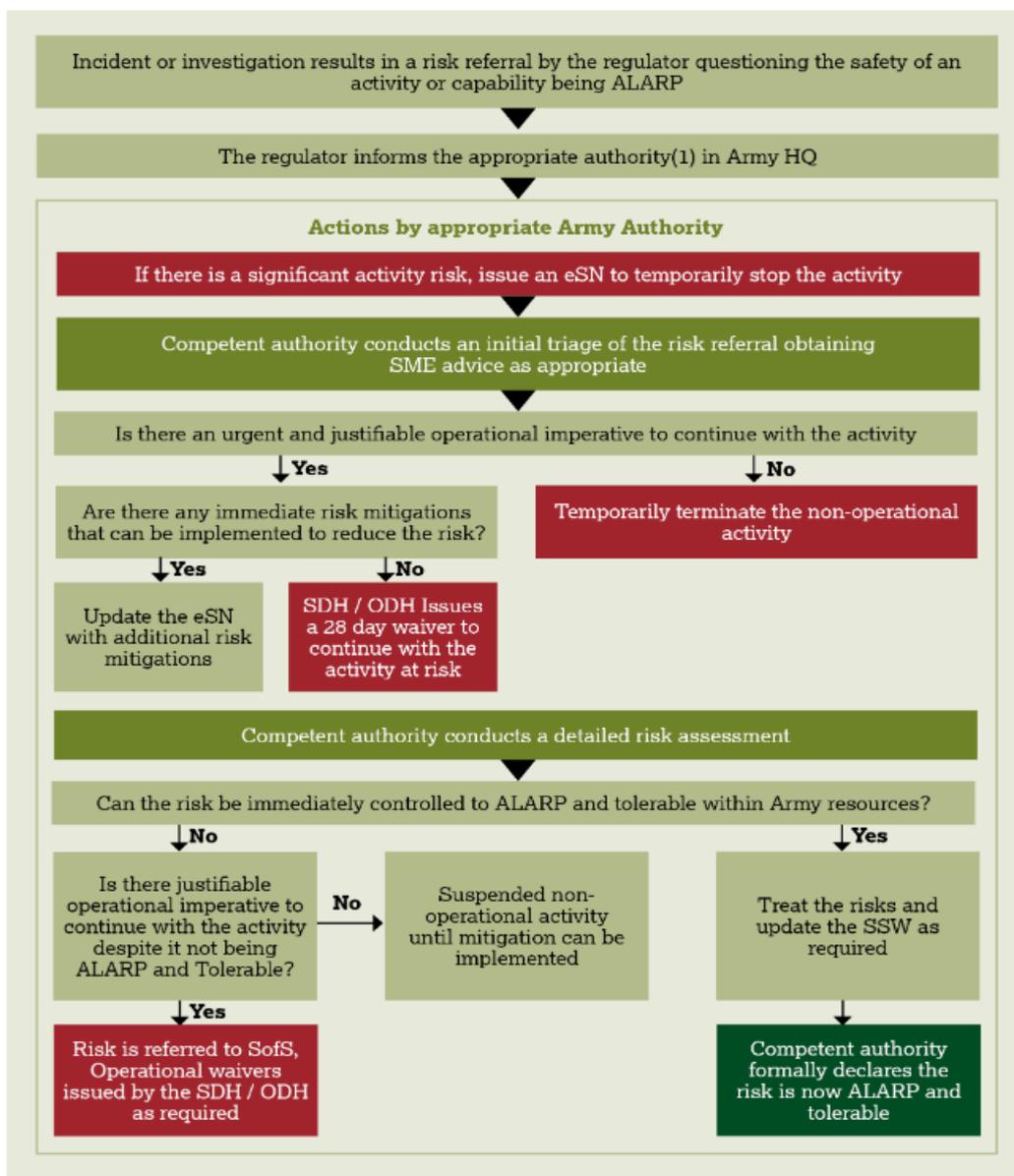Graphic #032/1

Army Safety
'Protecting the Force
Protecting the Nation'　ARMY
BE THE BEST

Figure 15. Top-down initiated risk referral

Application of DH21 in the operational context.

18.   The force generating organisation (usually the Service Commands) will retain DH responsibilities. Operational Commanders must be familiar with the DH constructs of the Service Commands with whom they interface. Commanders must also understand their responsibilities to the DH CoC for operating risk as well as to CJO for operational risk.

19.   Where the Army generates a force package / FE for an Operational Commander, the FGen CoC shall retain accountability and responsibility for the capability operating risks of the force package they have been directed to generate. The Operational Commander has a DoC to deploy and employ FE in accordance with the defined Safe Operating Envelope[105].

20.   The following process shall be followed if an Operational Commander identifies an enduring operational need to exceed the Safe Operating Envelope:

a.   Operational Commander. The Operational Commander shall refer to the FGen ODH.

b.   FGen ODH. The FGen ODH, in consultation with appropriate capability leads (who shall cohere the cross-DLOD leads / SME and any relevant external DH-facing organisations as appropriate) shall:

(1)   Consider and, where appropriate, issue a 28 Day waiver to enable the Operational Commander to continue with the activity outside of the operating envelope[106], whilst undertaking further analysis.

(2)   Assess new or potential hazards and where possible identify all possible additional controls to 'treat' any additional operating risks.

(3)   Formally assess and evidence the balance of risk, cost of further mitigation and operational (or training) imperative:

(4)   Where possible declare, the new risks are controlled to ALARP and Tolerable and in doing so declare a new Safe Operating Envelope for the Operational Commander, or.

(5)   Where the ODH is unable to 'treat' the risks within own resources and make an ALARP and Tolerable declaration[107] but agrees there is an operational (or training) imperative to continue to conduct the operational task they shall refer the risk to the SDH.

c.   SDH. Where operating risks have been referred to the SDH, the SDH in consultation with SME including DH-facing organisations and the Senior Operational Commander shall:

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[105] e.g. in the case of NEWCOMBE: CFA as ODH and Comds 4 and 7 BCT as DDHs.
[106] The 28-Day operational waiver is a tool to temporarily enable an operational Commander to conduct activity outside of the agreed operating envelope it is time and activity bound and intended to maintain operational tempo whilst deeper analysis is conducted – is not intended to be a solution the enduring need to exceed the Safe Operating Envelope – subsequent 28-day operational waivers should only be considered by exception.
[107] Based on a sufficient body of evidence directly proportional to the risk or due to the residual risk being outside their authorised threshold.

(1)   Scrutinize operating risks that have been referred to them by the ODH.

(2)   Consider through cost benefit analysis (CBA), the risks, cost of further mitigation and the operational (or training) imperative.

(3)   Where possible further 'treat' risks to formally declare them ALARP and Tolerable and in doing so provide a new operating envelope for the Operational Commander[108], or;

(4)   Where the SDH is unable to declare ALARP and Tolerable as they are unable to treat the residual risk within own resources but agrees there is an operational (or training) imperative to exceed the safe operational envelope, they shall escalate the risk to the SofS / CDS through the appropriate risk elevation mechanism eg the Contingent Readiness Assessment Framework (CRAF) or TLB Performance and Risk Reporting (PRR).

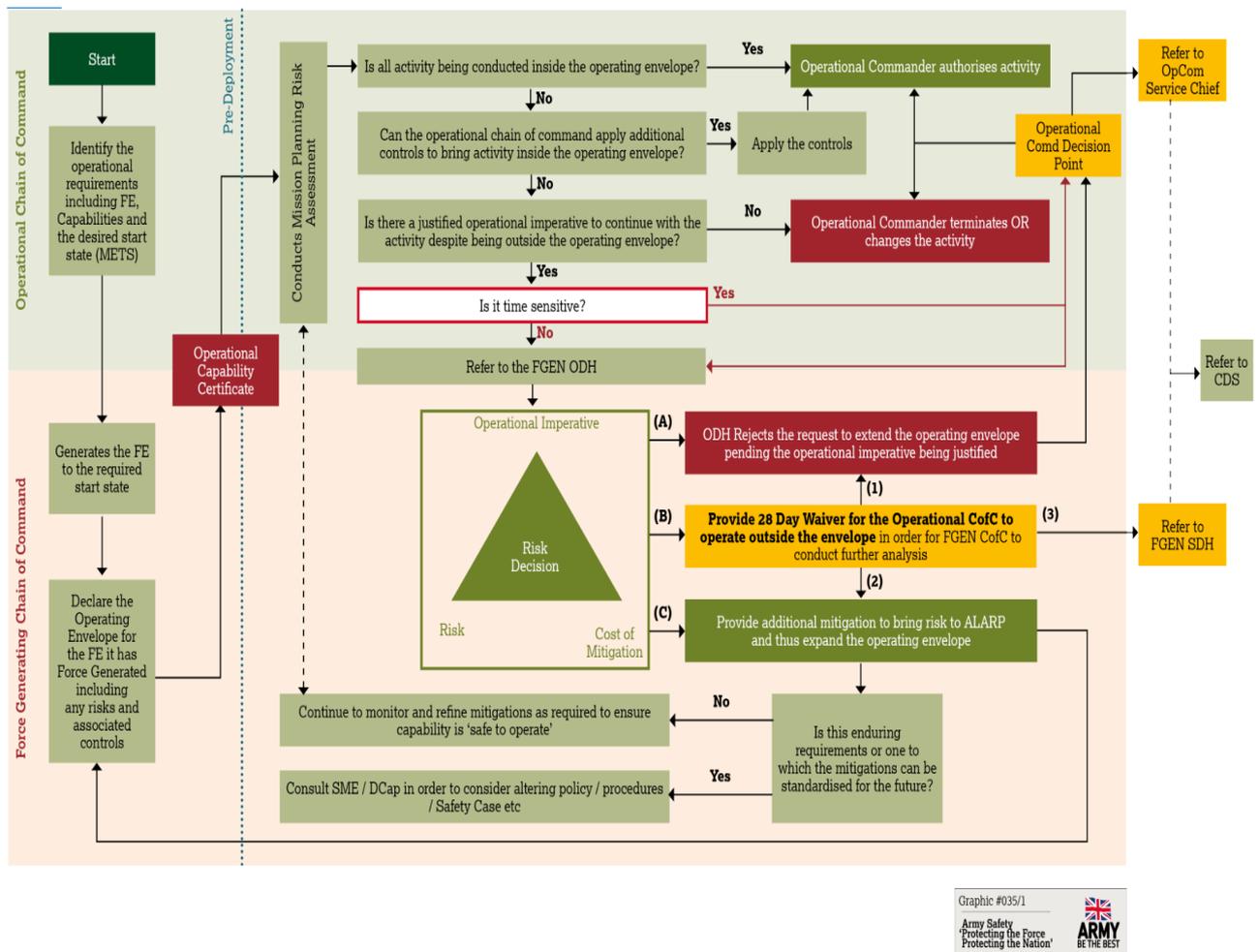21.   Fig 16 outlines a decision matrix for activity relating to the Operating Envelope:

Figure 16. Decision Matrix for Activity relating to the Operating Envelope

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[108] By exception, the SDH and Senior Operational Commander may 'share' accountability to 'tolerate' the risks.

Chapter 5

Environmental and Radiation Protection

Additional references:

A.   [JSP 392 - Radiation Protection in Defence](#).
B.   [JSP 317 - Joint Service Safety Policy for the Storage and Handling of Fuels, Lubricants and Associated Products](#).
C.   [JSP 850 - Infrastructure and Estate Policy](#).

Introduction

1.   The MOD must comply with UK Environmental Protection (EP) legislation and any international agreements the UK has signed. Most EP legislation stems from the EPA 90 supported by regulations covering EP areas including air quality, waste, water protection etc. Additionally, Devolved Administrations also have their own versions of EP legislation. Only on rare occasions, involving exercises and operations, disapplication, exemptions, and derogations (DEDs) apply[109]. All EP legislation and regulation is enforced by the environmental statutory regulators[110] who have the power to visit MoD sites and undertake enforcement action if necessary.

2.   Although the MOD has a Memorandum of Understanding (MoU) with the statutory regulators, the SofS has stated that the MOD will endeavour to protect the environment whilst conducting its business including routine tasks, exercises, and operations. When operating or exercising overseas the MOD must be compliant with Host Nation (HN) legislation, whilst also striving to follow UK legislation where it can, if it is better than the HN. The MOD's main EP policy document is at Foreword - Ref A, although this is supported by several other JSPs covering EP as at additional Refs A - C.

3.   LUCCS lead on EP within the MOD, with the Army lead being its Efficiency Programme Office (EPO) supported by the ASG-SC.

4.   FP (SHEF) Framework. Preface Refs C & F state that the management of EP at site and unit level should be conducted through an effective Environmental Management System (EMS) (ACSO 1200 - ASEMS). The Army delivers this through its integrated [Army FP (SHEF) Framework](#) which links activities into a coherent plan.

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[109] When DEDs are used; alternative arrangements must be put in place at least as effective as those in legislation.
[110] Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Natural Resources Wales (NRW) and Northern Ireland Environment Agency (NIEA).

Part 1

1.   To ensure that the Army maintains statutory compliance the roles and responsibilities are:

a.   ASG-SC. The ASG-SC is responsible for the maintenance of the Army's SEMS and assurance. The principal staff responsibilities are:

(1)   CESO(A). CESO(A) is the ASG-SC's principal representative for Army EP management and assurance.

(2)   SO1 FP. SO1 FP is the Army's EP focal point whose principal tasks are to ensure legislative compliance, support DH CC&S, advising on EP issues and representing the Army where appropriate.

(3)   SO2 FP(B). SO2 FP(B) supports SO1 FP and has particular responsibilities for radiation protection and providing SME EP advice and guidance.

(4)   AFPAs. AFPAs will provide EP Trg and advice for their assigned portfolio of units[111].

b.   HC. HQ HC (through RC) is the EP focal point for the Firm Base providing advice and direction to the RPoC SO2 and SO3 SHEFs. They are also responsible for managing the Army's EP training where appropriate.

c.   RPoC. RPoC SHEF staff are to provide advice to establishments within their AOR and to conduct ASEMSA A&I iaw the Demand Signal. They are also responsible for delivering appropriate local guidance/training when requested or identified.

d.   Garrison HQs. Garrison HQ SO2 SHEFs are an additional source of EP advice to establishments within garrisons such as Tidworth and Catterick. They should co-ordinate their efforts with their local RPoC SHEF staff.

e.   Head of Establishments (HoE)/Commanding Officers (CO). The HoE/CO is responsible for EP on their establishment and during their activities. They must:

(1)   Manage their EP liabilities and responsibilities effectively[112].

(2)   Appoint formal EP duties and ensure that appointees are trained to conduct these duties iaw with the Compendium of Mandated Course Trained Personnel.

(3)   Develop and rehearse annually a spillage response plan (SRP) as included in the FP (SHEF) framework.

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[111] AFPAs are assigned to a portfolio of units based on geographical location. This could include 4-6 different units.
[112] Using a site/unit FP (SHEF) delivery plan based on the Army SEMS Framework.

    (4)   Familiarise themselves with their responsibilities regarding waste management[113],including DoC with respect to hazard waste disposal.

    (5)   Maintain liaison with their RPoC, RIC and DIO staff to ensure infrastructure-based EP responsibilities are being met e.g. Oil/Water Interceptor maintenance, discharge consents.

    (6)   Ensuring that any management activities recommended in either a Land Quality Assessment (LQA) or a Land Condition File (LCF), are completed.

    (7)   Ensuring any contaminated land is included in the site's Hazard Register and Risk Assessments.

    (8)   Report all environmental incidences on DURALS e.g. spills, fly tipping etc.

2.   Radioactive Material. HoEs and units who hold radioactive material must:

    a.   Appoint a Radiation Safety Officer (RSO) and Workplace Supervisor (WPS).

    b.   For certain activities there may be a requirement to appoint a Radiation Protection Supervisor (RPS)[114].

    c.   Complete the Radiation Annual Holding Return[115] which will help AWE conduct a more tailored radiation advisory visit.

    d.   Training for all radiation appointments is conducted by Atomic Weapons Establishment (AWE).

3.   Electromagnetic Fields (EMF). The Control of Electromagnetic Fields at Work Regulations (CEMFAW) 2016 has tightened up EMF safety. EMF hazards can come from a variety of sources including communications, welding, and testing equipment. Units and HoEs are to:

    a.   Ensure EMF risk assessments are conducted on their sites.

    b.   Appoint the relevant EMF trained personnel[116].

    c.   Ensure EMF emitting equipment is included in the Radiation Annual Holding Return.

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[113] Non-Hazardous Waste management should subscribe to the waste hierarchy – reduce, reuse, recycle, (energy) recovery and disposal.
[114] Use of a handheld x-ray machine for example.
[115] Units to populate with their radioactive holdings and send back to AWE.
[116] Advice and training available from AWE.

4.   Air. All establishments/sites/units are contributors to the air quality within their AoR. To assist the maintenance of which, units should:

    a.   Ensure that all vehicles shall be regularly maintained and serviced to ensure no unnecessary emissions are produced.

    b.   Not dispose of any waste by burning.

5.   Conservation and Biodiversity. The Army is legally obligated to protect designated conservation areas[117] on its land. Army establishments that contain a designated area are encouraged to form a conservation group, who can support activity to protect and enhance the designated area and species within. Site/unit conservation groups can include anyone who works on the establishment and interested locals. All sites/units are encouraged to identify opportunities to enhance the natural habitat within their AoR, such as tree planting, bird/boxes etc. This should be included as an agenda item on the establishment FP (SHEF) committee meetings. Advice and guidance are available from the DIO's ecology team and civilian Wildlife organisations.

6.   Heritage. Many Army establishments have Listed Buildings and Scheduled Monuments on their sites, which are legally protected. Listed Buildings have to be inspected every four years and Scheduled Monuments every five by a specialist, coordinated by DIO. Some Scheduled Monuments may be located on an establishment's backdoor training area and may not be obvious to the untrained eye[118], such monuments must be identified so that no accidental damage occurs during unit activity.

7.   Noise. Establishments are encouraged to assess their activities for noise and reduce it where possible using a Noise Risk Assessment (NRA). They should have procedures in place for handling complaints. If noisy activities need to take place, neighbours should be informed in good time and the activities restricted to the daytime if possible.

8.   OME. All establishments/sites/units are encouraged to have a method whereby small arms ammunition and pyrotechnics that may have been mistakenly retained on a person can be returned such as an Amnesty Boxes.

9.   Radiation Protection. Legally, the Army must appoint a Radiation Protection Advisor (RPA). Therefore, ASG-SC has a contract with AWE to provide this service. AWE conduct radiation protection advisory visits, conduct training, provide a dosimetry service and other capability support as required.

10.   AWE conduct radiation advisory visits at units every three years. A report is created that may contain recommendations. HoEs and units shall action any recommendations and send confirmation to AWE and HC. A radiation protection website maintained by AWE and containing useful resources[119] is available and should be the first port of call should a unit have a query on radiation protection.

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[117] Special Area of Conservation (SAC), Special Protected Area (SPA) and Site of Special Scientific Interest (SSSI).
[118] Ancient burial mound for example.
[119] Templates, generic standard operating procedures, training advice etc.

11.   Army Cadets. Although efforts are made to ensure cadet units hold as little radioactive equipment as possible, a small amount is held securely in some locations[120]. There is a risk of legacy radioactive items being donated by well-meaning individuals outside the official system. Therefore, AWE offer a bespoke advisory service, including training for HQ RC staff, Army Cadets and RFCA.

12.   Army Museums. Such museums who hold radioactive artefacts shall appoint an RSO. Bespoke training and support to official Army museums are available from AWE.

13.   Summary. As with any activity, communication is key to delivering both the Army's legal obligations and the opportunities that are presented. This can be enhanced and maintained by including all relevant EP subjects as a regular agenda item at FP (SHEF) committees. Therefore, it is important that sites/establishments/units, led by the HoE/COs, regularly communicate with other stakeholders including lodger units, DIO representatives and local communities. The above provides general guidance on managing EP liabilities within an Army establishment. More detailed guidance is available from the ASG-SC and the EP component of the SEMS framework.

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[120] SUSAT gun sights, for example.

Chapter 6

Fire Safety Management

Additional references:

A. The Regulatory Reform (Fire Safety) Order 2005.
B. The Fire Safety (Scotland) Regulations 2006.
C. The Fire Safety (Northern Ireland) Regulations 2010.
D. Fire Safety (England) Regulations 2022.
E. JSP 426: Defence Fire Safety and Fire Risk Management policy, Guidance, and Information.
F. 2023DIN06-021-Fire Risk Assessment Frequency.
G. ACSO 1204 - HOE Responsibilities.
H. ACSO 1205 - Cooking in Single Living Accommodation.
I. Compendium of Mandated Course Trained Personnel.

Introduction

1.   The discharge of daily and routine Fire Safety Management (FSM) activities is the responsibility of the Army through a 'Responsible Person'[121] meaning:

a. in relation to a workplace, the employer, if the workplace is to any extent under his control;

b. in relation to any premises not falling within paragraph (a) –

(1)   the person who has control of the premises (as occupier or otherwise) in connection with the carrying on by him of a trade, business or other undertaking (for profit or not); or

(2)   the owner, where the person in control of the premises does not have control in connection with the carrying on by that person of a trade, business or other undertaking.

2.   DFSR are part of the and is the Authority responsible for enforcing UK fire safety regulation on MOD establishments. They will consider compliance, conduct risk-based audits, and conduct SME investigations.

3.   DFR are the focal point for all advisory matters relating to Fire Safety Management (FSM) across the Defence and the Army, including on deployed Operations and are responsible for advising AP who themselves manage Defence's exposure to fire risk at the corporate level, ensuring that consistent and coherent advice on mitigating the business and capability risks posed by fire is available to all HoEs/COs across the Army. DFR are also the contract monitoring organisation for Capita Fire & Rescue (CFR) who deliver a range of services on behalf of DFR.

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[121] Footnote 1 to Leaflet 1 to JSP 426 in that the "Responsible Person (RP) as specified in the Regulatory Reform (Fire Safety) Order 2005 (England and Wales); Duty Holder in the Fire Safety (Scotland) Regulations 2006 (as amended); Fire Safety Regulations (Northern Ireland) 2010 are referred to as the 'Accountable Person' (AP) within Defence.

4.   CFR are Defence's principal delivery contractor for operational fire support, delivering Fire Risk Assessments and providing FSM advice. CFR have no enforcement authority.

Part 1

5.   Fire Safety Measures. It is a legislative requirement that employees are appropriately protected from fire. A vital component in achieving this goal is that all employees should be trained in fire safety measures related to their establishment or location. It is a unit responsibility to conduct local fire awareness training for any service, civilian and contracted persons employed to work on the MOD estate on the following occasions:

   a.   When joining an establishment (including training establishments) as part of formal arrival procedures.

   b.   Whenever the fire safety risk in a workplace (including deployment locations and accommodation facilities) change in such a way that retraining of personnel is required.

   c.   Fire evacuation drills are to be conducted at <u>annual intervals</u> as a minimum and more frequently when warranted by the local risks. Ideally, one evacuation should be conducted during normal working hours and one in twilight hours. Fire evacuations should also be incorporated to cover all personnel where shift work is conducted.

   d.   Fire Awareness on an annual basis. However, more frequent training may be required in high/special risk areas, where special equipment is provided or when deemed necessary by Legislation /Regulation, local circumstances, or a Fire Risk Assessment (FRA).

6.   Sleeping in Non-Designated Accommodation (SINDA). It is acknowledged that there may be occasions requiring military personnel to sleep in non-designated accommodation which is defined as premises not originally designed as sleeping accommodation including Army Reserve Centres (ARCs) and Cadet Centres (CCs).

   a.   Non-designated accommodation is defined as premises not originally designed as sleeping accommodation including Dutch barns, stone tents, ARCs, and CCs etc.

   b.   The Activity Owner is normally the CO, OC (sub-unit Comd) or nominated Crown Servant who retains responsibility for ensuring that a suitable and sufficient risk assessment is conducted and that risk mitigations are implemented.

   c.   The risk assessment should be based on the guidance provided by the facility in use. All facilities should be assessed by a competent Fire Safety Practitioner prior to first use. Having a suitable and sufficient assessment of the risks to which personnel will be exposed, for the purpose of identifying the general fire precautions that must be taken, is a legal requirement.

   d.   In the event of a short notice requirement that may be too late for HoE endorsement then the Activity Owner should ensure that they have considered any associated instructions relating to the facility in use as described above ie HoE guidance.

e.   HoEs of each facility that may be used for SINDA should provide their own instructions peculiar to their situation so that any control measures that the HoE requires are considered.

7.   Chain of Command. SINDA can be authorised by the CoC but should not be used when other means of correctly accommodation personnel is available, regardless of convenience or cost. Accountability and responsibility remains with the activity owner who must ensure:

a.   That any requirement for SINDA is based on a clearly defined, justifiable and auditable imperative e.g. an Army Reserve weekend exercise is cancelled at short notice after personnel have already paraded at the ARC; there is no public transport and no other means for personnel to return home; there is no alternative accommodation available such as hotel or guest house, and the risk (to life) for personnel walking home late at night on unlit roads outweighs that of implementing SINDA.

b.   The period of SINDA should be kept to the absolute minimum necessary and not be used as a routine means by which to accommodate personnel. SINDA periods should not run consecutively.

c.   HoE who retains DoC responsibilities for all personnel using their site must be notified by the activity owner if SINDA may be a component of the activity to be conducted.

d.   Activity owners should satisfy themselves that the HoE has conducted a suitable and sufficient risk assessment, clearly identifying fire as a hazard, with suitable practical control measures put in place (usually via a Standard Operating Instruction (SOI)). This should be reviewed on a regular basis.

e.   It is the responsibility of the Activity Owner to ensure that the requirements of additional Ref E are complied with, along with any additional measures that the activity owner feels necessary. These should be recorded for each bespoke event.

8.   Tented Camps. Additional Ref E covers fire precautions required for Tented Camps in Support of Operations and Exercises which remain unchanged.

9.   Disabled Persons. The UK fire safety legislation (additional Refs A – D) covers the need to evacuate all people out of buildings safely in the event of fire. It is the responsibility of the Line Manager and Building Fire Focal Point (BFFP) to establish disabled staff or visitor's assistance requirements in the event of an emergency. If any member of staff or visitor requires assistance, a Personal Emergency Evacuation plans (PEEP) should be put in place by the Manager or BFFP.

10.   Fire Risk Assessments (FRA)[122]. It is a legal requirement under additional Refs A - D that all buildings must have an FRA. These are overseen by DFR but delivered by CFR. FRAs are managed through the Defence Assure System and overseen by the ASG-

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[122] An FRA review is a legal requirement placed on the AP with national sector guidance advocates that FRAs are reviewed annually. However, the exact periodicity for a review may also be varied and advised to the AP (HoE) by a competent fire risk assessor.

SC/RPoCs. Sites requiring information on or copies of the FRAs associated with their buildings should contact their RPoC in the first instance.

11.   Quality Control. DFR are responsible for conducting Quality Control of all FRAs across Defence. However, FPSA must conduct 1LOD on the FRAs within their AOR when they are either new, changed or updated[123].

12.   Accessibility. Defence uses the ASSURE database to manage all FRAs for content, timeliness, and changes. For the Army access to the ASSURE database is through HQ RC and RPOCs overseen by the ASG-SC; therefore should HoEs or units require information regarding the validity of the FRAs relating to their buildings they should contact their RPoCs in the first instance.

Roles and Responsibilities

13.   Heads of Establishment (HoE). Within the Army, all HoE responsibilities are contained within additional Ref G. For short-term 'Urgent Operational Needs' the baseline requirement may be reduced further by the HoE, in consultation with DFR, who should consider Waking Watch / use of Grade F smoke detectors as means of detection and warning if appropriate as an ALARP solution as further risk mitigation factors when they conduct the FRA for the premises in such circumstances.

14.   Units. Units must:

a.   Ensure that suitable FSM plans, including organisation and arrangements, are prepared, and enacted. These must be reviewed annually.

b.   Appoint personnel to fulfil Safety Management Responsibilities who are suitable trained and qualified in accordance with this ACSO and additional Ref I.

c.   Ensure that site fire safety awareness is included in all Workplace Inductions Packages (WiPs) and that a fire evacuation drill is completed at least annually as a minimum with the date and outcome recorded.

d.   Ensure that personnel appointed to any role that has fire safety responsibilities should be suitably trained and qualified within 3 months.

e.   Escalate any FSM risks (safety and infrastructure) that they are unable to deal with to their RPoC.

f.   Maintain an awareness of all the building FRAs within their AOR through their RPoC.

g.   Ensure that FSM is included in all FP (SHEF) Command Boards and committees.

h.   Where the CO is not a HoE and are taking fire safety related disciplinary action iaw AGAI 62 - Discipline Policy they are to inform HoEs as appropriate.

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[123] To assist with this the FPSA cse includes a specific FRA 'What does good looks like' module.

15.   Regional Points of Command (RPoCs). RPoCs principal tasks are:

    a.   Oversee and monitor the FSM plans produced by units iaw with additional Ref D.

    b.   Support the delivery of suitable FSM plans in conjunction with DFR.

    c.   Escalate any FSM risks (safety and infrastructure) that they are unable to deal with to HQ RC.

    d.   Utilise ASSURE to maintain an awareness of all the building FRAs within their AOR.

    e.   Are responsible for 2LOD Fire Safety Assurance in line with the Army SEMS Audit (ASEMSA) question set and that the results are recorded on ARMS.

16.   Army Commands. The Army Commands (HC, Fd Army and JAC) are responsible for ensuring that their commands operate appropriate FSM practices iaw this ACSO and providing suitable 2LOD assurance iaw Ch. 11[124].

17.   Directorate Building and Infrastructure (DB&I). DB&I is responsible for ensuring the Army meets all of its fire safety infrastructure responsibilities and, where these may not be cost effective, elevating the risk appropriately and informing the AHSEC.

18.   Army Safety Group (ASG). The ASG is responsible for supporting the delivery of the Army's FSM responsibilities on behalf of DCGS, the Army's AP for FSM. It is acts as the TRA for Army non specialist fire safety training[125]. The principal staff responsibilities are:

    a.   AH Safety (A). Hd Safety (A) is the Senior Safety Manager (SSM) for Army FSM, representation, and assurance.

    b.   SO1 FP. SO1 FP is the Army's FSM focal point whose principal tasks are:

        (1)   Ensuring that a Joint Business Agreement (JBA) is agreed and maintained between Army HQ and DFR. This must be reviewed annually and agreed at AHSEC for enactment the following financial year.

        (2)   Representing the Army for DSA Major Accident Control Regulations (MACR).

        (3)   Representing the Army within the Defence fire safety governance.

        (4)   Undertaking APSA responsibilities for FSM on behalf of the ASG-SC and undertaking the activities of the Army Fire Safety TRA.

        (5)   Supporting Defence's assurance of the Army's delivery of fire safety including liaison with the DFSR, DFR and CFR.

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[124] Using the ASEMSA HLB QS available and recorded on ARMS.
[125] SO1 FP & SO2 Trg.

19.   FSM Appointments. All Fire Safety Management appointments should be IAW Ch 1, Pt 2.

Part 2

20.   FRA. Within UK fire safety legislation there is no statutory requirement to undertake FRAs within set timescales, with Defence establishing its own criteria to determine frequency. The frequency for the delivery of FRAs within Defence premises being defined through a risk-based approach which takes account of any risk associated with the premises, the activity undertaken within the premises, and the potential impact of loss to Defence capability.

21.   An FRA should be conducted by the competent Defence Fire Practitioner (FSP), by virtue of delegations and agreements, provides fire and rescue services that include the provision of appointed persons to undertake FRA(s) on behalf of HoE to assist them in discharging their legal obligations as relevant RP. The FRA must be reviewed by a FPSA depending on risk or if the situation changes ie a new appointee. Reviews of the FRA are dependent on the risk grading given by the FSP.

22.   Changes affecting the frequency of stipulated FRA delivery within the JSP 426 leaflet are summarised in the tables 7 and 8 below:

Type of Premises	Frequency
Higher Fire Risk / Complex Premises	Annually
Defence Critical national infrastructure	Annually
Familiar / Unfamiliar Sleeping Accommodation	Up to 2 years

Table 7 – FRA Frequency

23.   For all other premises on the Defence estate, the frequencies for the delivery of FRAs will be predicated on the FRA assessed risk rating as referred to below:

Type of Premises	Frequency
Substantial risk	Annually
Moderate risk	Up to 3 years
Tolerable / trivial risk	Up to 5 years

Table 8 – FRA Risk Rating

24.   Out with the frequencies identified above, changes in circumstances affecting Defence premises may also drive the requirement for the AP to request the provision of an FRA. The circumstances under which this may apply can be found within JSP 426 Leaflet 2 para 33.

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

26.   Point of Contact. The Army HQ focal point for all Fire Safety Management (FSM) is SO1 FP: ASCen-Mailbox (MULTIUSER) ASCen-Mailbox@mod.gov.uk.

Chapter 7

Occurrence Reporting

Additional references.

A.   [JSP 375, Chap 16 - Reporting](#).
B.   [2023DIN06-007 - Managing Common Law Compensation Claims for Personal Injury and Property Damage brought against the MOD](#).

Introduction

1.   An **occurrence** includes an accident – defined as an unintended event resulting in harm or damage, an incident - defined as an unintended event not resulting in harm or damage, a near miss, dangerous occurrence, unsafe act, or unsafe conditions. For clarity of language from this point on an **occurrence** refers to all these elements. The Army reporting principle is to report everything including, but not restricted to occurrences, climatic injuries, occupational ill health, serious equipment failure, ammunition occurrence (including Free from Explosives (FFE) violations) and dangerous occurrences, including those involving fire and radiation hazard.

Part 1

Reporting

2.   Requirement. All occurrences[126] across the Army must be reported on DURALS and, where appropriate, exercise instructions and supporting documents should be attached. The notification is not to be amended in any way.

3.   Applicability. This reporting requirement applies to all Army personnel, including those commanded or administered by other TLBs, including all Reservists and Army Cadet personnel[127] when on duty; RN/RM, RAF and civilian personnel working in the Army or when operating Land Systems equipment, (e.g. weapons and vehicles), Army Maritime, members of visiting Armed Forces and anyone affected by Army activity, its property or estate and contractors working on Army sites.

4.   Occurrence Managers. In line with the utility of DURALS all organisations and units are to appoint a competent Occurrence Manager who is responsible for conducting initial scrutiny of any occurrence submissions including DURALS Alerts for their validity and any subsequent actions including additional completion of the Occurrence Report (OR) as more information is known and appointing a competent FPI if an investigation is required. The Occurrence Manager is also responsible for conducting 2LOD of the investigation outcomes.

5.   Following the submission of a DURALS Occurrence Report (DURALS OR) units will receive an acknowledgement email from DURALS containing details of the occurrence as reported and a unique reference number (URN) enabling units to:

    a.   Verify that DURALS has correctly recorded OR details.

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[126] Accidents, incidents, near misses, climatic injuries, occupational ill health, serious equipment failures and dangerous occurrences including environmental occurrences, fire or involving contractors whilst on Army administered MOD land or property.
[127] Cadets, CFAVs and contractors.

b.   Confirm unit ownership of the OR (and therefore the occurrence).

c.   Transfer ownership if required (via the ARC).

d.   Conduct a unit investigation[128] unless there is a valid reason not to.

e.   Record and action the findings.

f.   Escalate to the most suitable level, as necessary.

6.   RIDDOR. While RIDDOR applies to all Civilian personal, there are exceptions for military personnel. However, all likely RIDDOR should be recorded. The ARC is the agency charged with overseeing the Army's approach to RIDDOR and reporting an RIDDOR to the HSE if necessary (less for contractors). However, there is a need to ensure that it is appropriately recorded initially through DURALS.

7.   Adventurous Training (AT). For AT, including expeditions and overseas activity, instructions are to contain details of the DURALS OR process clearly stating that all occurrences should be reported using DURALS in addition to any local arrangements.

8.   ASIT. The ASIT are part of the ASG-SC and will automatically be notified by DURALS.

9.   Army Off Duty Reporting. All military personnel are to report occurrences that occur when Off Duty if the occurrence impacts on their ability to deliver their operational outputs such as injuries that prevent delivering their primary role or duties or damage to military equipment or infra.

10.   Matters of Public Interest. Where an occurrence has happened that may be of Public Interest, this is to be reported using DURALS where it will be automatically reported to the ARC and their CoC Duty Officer (One Up).

11.   Contractors. Contractors usually report occurrences under their own reporting procedures to their employer who is responsible for ensuring that they inform the HoE/CO of the site or activity. It is the HoE/CO's responsibility to ensure that ORs are entered onto DURALS.

12.   Promulgation. The requirement to report on DURALS must be included in all Exercise, Range and Training Instructions and Duty NCO, Officer, Staff Officer Folders etc. The reporting requirement (report everything) and method (DURALS) are to be repeated on Unit Orders at least an annual basis.

13.   MOD Claims. MOD Claims. Every year thousands of claims are raised against the MoD due to injury. Units or establishments are often approached by lawyers asking for documentary evidence and witness statements. There is a legal duty to provide documentary evidence to the court, but only through the lawyers working for the MoD. Those law firms working for the MoD are named in Annex C to additional Ref B. If the request is from lawyers not on that list, then Units or establishments must not respond

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[128] IAW JSP 375, Vol 1, Chap 16.

directly but must forward the request asap to Topmark Claims Management at Defence.CM@davies-group.com. Any direct communication with the claimant's lawyer may amount to accepting responsibility for processing an individual's claim, or accepting, admitting, or denying liability for the occurrence giving rise to the claim. If in doubt units or establishments should contact the CLCP in Annex C to additional Ref B.

Part 2

14.   Other Notifications. Using the principle of 'report once, use many times' the majority of Defence departments and organisations who require notification of an occurrence will automatically be notified by DURALS, there are certain agencies with specific requirements:

a.   Joint Casualty and Compassionate Cell (JCCC). Where it is necessary to comply with the JSP 751 - JCCC Policy and Procedures, there is still a requirement to submit an additional notification[129].

b.   Defence Accident Investigation Branch (DAIB)[130]. DAIB notification thresholds have been digitised within DURALS which will <u>automatically</u> notify them if these are met. However, the occurrence reporter has the option to **deactivate** the auto-notification should they wish.

15.   Near Miss Reporting. Near Miss reporting is an indicator of effective safety culture, as well as an excellent opportunity to learn without anyone being harmed. To support the Army's intent to be pre-emptive, all Near Misses should be reported on DURALS which will aid trend and thematic analysis across the force.

16.   Army Reporting Cell (ARC). The ARC is the Army's system administrator for DURALS responsible for:

a.   Analytics – providing management information for ARMY HQ and Commands at ASL level[131].

b.   Audit – conducting quality control and audit of Army inputs into DURALS.

c.   Administration – undertaking administrative responsibilities for the Army's use of DURALS including permissions, feedback, and development oversight.

17.   Advice. The ARC can provide advice on the system use as well as for RIDDOR. The ARC can be contacted on <u>ASCen-ARC-Mailbox@mod.gov.uk</u>.

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[129] ARC is linked into the Joint Casualty and Compassionate Cell (JCCC).
[130] <u>2023DIN06-024-The Defence Accident Investigation Branch</u>.
[131] CGS, DCGS, ACGS (& BGS), Comd HC, CFA and Comd JAC.

SECTION 3 – CHECK

Introduction

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

2.   Internal Enforcement - Defence Regulators. Defence Regulators, working on behalf of DG DSA, regulate areas of Defence that have Disapplication, Exemption or Derogation (DEDs) from civil legislation. They have enforcement powers, but do not have powers of prosecution. Further details are in [Defence Safety Authority 01.1 - Regulations](#).

3.   Safety Governance. As part of the Army's SEMS all areas of the Army should have structured and empowered safety governance organisations and arrangements that enable FP (SHEF) risks to be managed at the appropriate level. Commanders must set the example in energising safety governance, chairing meetings when appropriate to do so and taking an active leadership role in managing FP (SHEF) risks. Formation Commanders and staff branch heads are to establish governance mechanisms that actively manage FP (SHEF) matters in their AoRs. Army HQ safety governance is at Ch. 8.

4.   Army FP (SHEF) Investigations. Investigations are an essential part of the Army's SEMS to better understand the root causes of occurrences, identify trends and improve the Army's learning. Irrespective of a DAIB/ASIT investigation, the Army is required to conduct a suitable and sufficient investigation including supporting evidence such as exercise instructions and supporting documents[132].

5.   Assurance, Audit, and Inspection. ACSO 9001 details the Army's Policy for Audit and Inspection (A&I). It situates A&I in the context of the Defence Operating Model (DOM), whilst describing the Defence assurance taxonomy and the division between 1st, 2nd and 3rd Lines of Defence (LOD) assurance. The ACSO 9001 model allows Commanders to manage risk according to context and learn from genuine errors, whilst not accepting negligence or recklessness. This is enacted through sub-ACSO 9016 for ASEMSA.

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[132] DURALS facilitates the uploading of documents, photographs etc.

Chapter 8

Army Safety Governance

Introduction

1.   ASG-SC provide advice, guidance, and support to the Army for Functional Safety to enable them to deliver activity in keeping with the Army safety approach. This includes safety governance system, including Command Safety Boards, run the Army Health, Safety and Environment Committee (AHSEC) for CGS/DCGS and chair the Army Functional Safety Steering Group (AFSSG). Support senior leaders in representation at Defence and external safety meetings, including the DSEC. The Army Safety Governance Structure is at Fig 17.
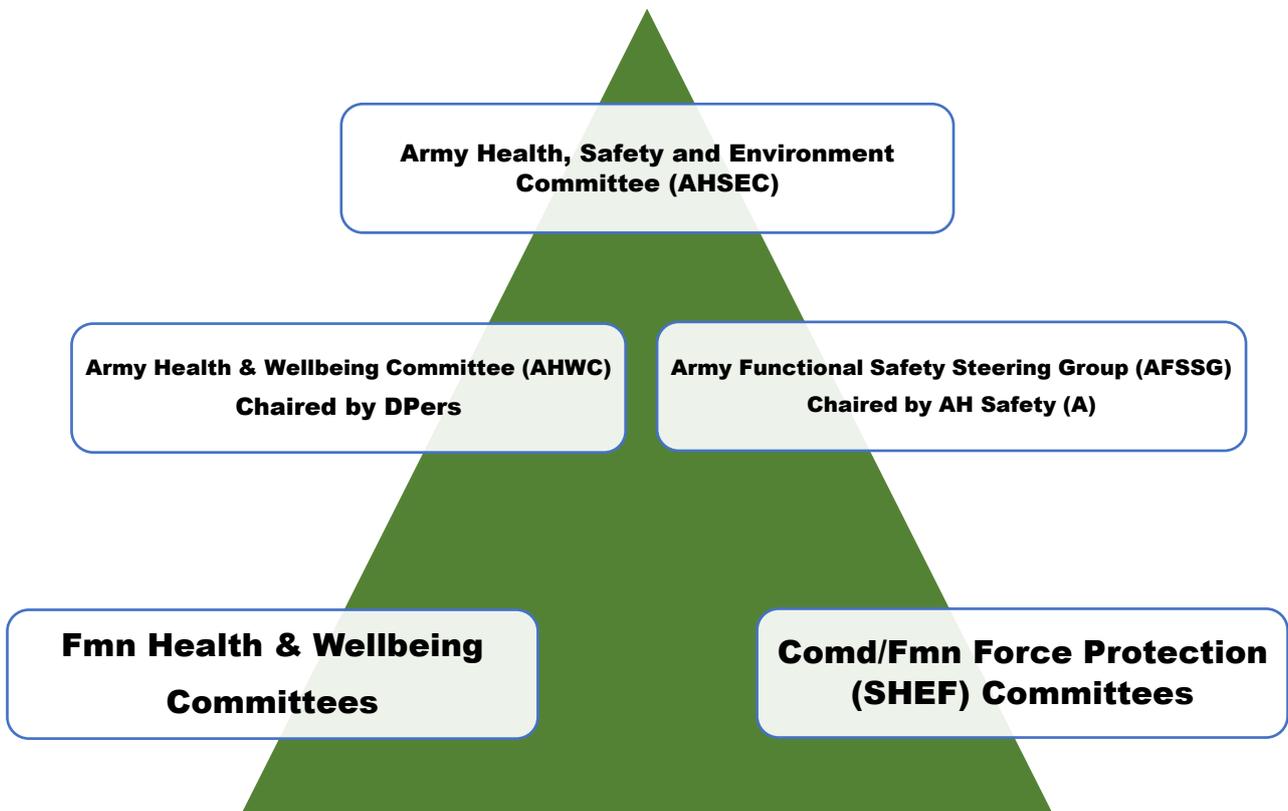
Figure 17. The Army Safety Governance Structure

Part 1

1.   The Army Health, Safety and Environment Committee (AHSEC) is the Army's biannual strategic safety, environment, and fire governance committee. Its remit covers all Army personnel, equipment, infrastructure, and activity, irrespective of command arrangements with other TLBs, and others who may be affected by the Army's acts or omissions. Its role is to ensure that the Army's Safety Management and Environmental System remains fit for purpose, is adhered to, assured, and adequately resourced. It has continuous improvement of the Army's performance as its central tenet and recognises

that SEMS underpins the physical and morale components of fighting power and is therefore an enabler of Army capability.

2.   In order to ensure that SEMS performance is optimised, it is driven by CGS who chairs the AHSEC. This top-level governance ensures CGS and key senior officers in SEMS-facing roles maintain an awareness of critical SEMS issues and provide appropriate governance to manage SEMS risk. It is the forum in which CGS will review SEMS[133] performance throughout the year culminating with the Army SEMS Annual Assurance Report (AAR) each Jun, which details the previous 12-months and identified the Army's continuous improvement activities.

3.   In CGS's absence the AHSEC will be chaired by DCGS – who is the Army Safety Champion. It is scheduled on a biannual basis and as such, the role of the AHSEC is to support CGS in their role as the Army's SDH and take forward direction from the DSEC if required.

4.   The AHSEC is supported by a series of other meetings whose ToRs and attendance are contained within Army SEMS SoPs. These include, but are not limited to:

    a.   Army Health and Wellbeing Board chaired by DPers.

    b.   Army Functional Safety Steering Group chaired by Hd Safety (A).

    c.   Army Fire Safety Management Committee (AFSMC) chaired by AH Safety (A).

    d.   Army Lessons Steering Group (ALSG) chaired by BGS.

6.   All Army Commands, fmns and units are to replicate a similar governance approach with, at a minimum a biannual battle rhythm, to ensure that the CoC oversight of their DoC responsibilities is suitable and sufficient with all Governance activities must being recorded for both audit and assurance.

Part 2

Construct

7.   Army Health, Safety and Environment Committee (AHSEC):

    a.   Aims:

        (1)   Maintain an awareness of critical SEMS issues.

        (2)   Provide governance to manage SEMS risk.

        (3)   Support DCGS in their role as the Army Safety Champion.

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[133] Health assurance (including occupational and environmental) is the responsibility of Army Health Branch – Hd Healthcare (A).

(4)   Prepare the Army's attendee for the Defence Safety and Environmental Committee (DSEC)[134].

b.   Chair: The AHSEC chair is CGS.

c.   Attendance: Key senior officers in SEMS-facing roles.

d.   Scheduling: Biannually.

e.   Terms of Reference (ToR): Army SEMS SoPs.

8.   Army Functional Safety Steering Group (AFSSG):

a.   Aims:

(1)   Receive direction from the AHSEC.

(2)   Monitor progress of the work directed by the AHSEC.

(3)   Provide direction, updates, and briefings to the Army.

(4)   Oversee any Civil Service safety issues[135].

b.   Chair: AH Safety (A) is to chair the AFSSG.

c.   Attendance: Safety staff and desk officers leading on key Safety issues.

d.   Scheduling: Quarterly.

e.   ToR: Army SEMS SOIs.

9.   Army Safety Group - Secretariat:

a.   Maintain the Army SEMS battle rhythm[136].

b.   Provide administrative support to AHSEC and AFSSG.

c.   Attend DSEC as directed.

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[134] DSEC battle rhythm is quarterly.
[135] As highlighted by TU representation.
[136] The health (occupational and environmental) component is the responsibility of Army Health – Hd Army Health and Wellbeing.

Chapter 9

Organisational Safety Assessments

Additional reference.

A.   [JSP375 Vol 1 Ch 35 Safety and the management of change](#).

Introduction

1.   The aim of an Organisational Safety Assessments (OSA)[137] is to assess – and subsequently manage – the potential impact of an organisational change on the Health, Safety and Environmental Protection (HS&EP) standards being delivered by the organisation's SEMS (in accordance with additional Ref A). An OSA is an HS&EP risk assessment for an organisational change and, as such, should ideally be conducted prior to the decision point of the planning process to inform decisions on whether and how the change should be implemented.

2.   However, OSAs should not necessarily focus just on risks but it is good practice to also consider opportunities where a change could enhance HS&EP standards; this will help the OSA owner to balance the overall level of risk. OSAs include an implementation plan which ensures that the risk controls stipulated by the change owner implemented successfully.

Part 1

3.   Army Approach. The Army specifies that this should be done using an accepted framework which for simple changes can be the SSW; Safe People, Safe Equipment, Safe Practices and Safe Place; for more complex internal organisational changes that have been initiated by the Army itself the G1 - 9 Functional Responsibilities is recommended and for organisational changes that may impact externally then the DLODs template is recommended. The OSA should be completed by the unit or those most affected by the organisational change after which it should be agreed (signed off) by the appropriate Change of Command and then endorsed by Army HQ (StratCen) as per Table 9.

Organisation	Conducted by (Most Affected)	Signed Off by (CoC)	Endorsed by	Reviewed by
Unit	Sub-unit	Unit	Bde	Div
Bde	Unit	Bde	Div	Command
Div	Bde	Div	Command	Army HQ (StratCen)
Command	Div	Command	Army ExCo	
Army	Command	Army HQ (StratCen)		
Army HQ	Directorate	Army ExCO	Army ECAB	

Table 9: OSA Sign Off Profile

4.   Requirement. The requirement to undertake an OSA rests with the organisation that is initiating the change through the issuing of an Implementation Order (IO). For the Army

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[137] Includes Environmental Assessments.

this is usually StratCen but could also be one of the Army down to formation level. Consequently, the organisation issuing the IO is responsible for the oversight and scrutiny of the OSA as per para 3.

5.   Criteria. An OSA should be proportionate to the complexity and scale of the proposed change. Typically, the following types of organisational change have significant potential to impact on SHEF standards and should always require an OSA:

    a.   Re-rolling of Military units or organisations.

    b.   Adoption of new equipment and/ or platforms.

    c.   Major re-organisation of staff or re-alignment of senior management responsibilities.

    d.   Major re-basing of capabilities.

    e.   The transfer of infrastructure and sites from or to another organisation or closure of major sites.

    f.   Reductions to military and/or civilian staffing levels at a site or across an organisation.

    g.   Outsourcing of major areas of the Army's enabling or supporting capabilities to industry partners.

    h.   Changes to DH arrangements.

6.   However, where the IA or AP assesses that there is no or low potential for a change to impact on HS&EP standards and that an OSA is not required, this decision must be documented, either within the Implementation Order or for example in the minutes of Change Programme Meetings/Boards.

7.   Owner. The OSA owner will usually be an AP (Commanding Officers, HoE and DHs for the organisation that is changing, because they will own the residual risk from the change:

    a.   Involve all relevant stakeholders in the assessment process.

    b.   Decide whether the level of residual risk associated with the change is considered acceptable. If not, they should take the appropriate action as stated above.

    c.   In cases where, to maintain levels of safety management performance, a resource change or assured dependency is required, then a change implementation or risk management plan is conducted.

    d.   Where organisational change is initiated that affects another TLB that the other TLB is consulted, and effective preventive and protective measures are put in place to the satisfaction of the other TLB.

8.   Substantial change programmes will have an SRO who is responsible for the governance structure of the programme which may span multiple AP areas. In these instances, the SRO should coordinate the overall OSA and ensure that the risk appetite is agreed across the programme; however, AP(s) remains accountable for HS&EP within their area of responsibility (AoR) so should assess and own their respective risks and be prepared to challenge any decision-making by the SRO.

9.   Results. The results of the OSA analysis should inform the decision-making process for the change. If the risks are unacceptable, or the OSA Owner is unable to manage risks within their risk appetite or the risk appetite of the programme (for example a Critical Success Factor that safety should be at least as good as before the change), they should postpone the change. They should then formally escalate the risk within the CoC so that additional levers of control can be applied, or a decision made at an appropriate level regarding the implementation of the change.

10.   Timing. The OSA process (if required) should commence as soon a requirement for organisational change is identified. This is necessary to establish the starting baseline from which the change is to be assessed.

Part 2

11.   Process. Where change will take place in distinct stages, the AP should clearly detail the plan for OSAs at all stages to ensure that all risks are considered and are not overlooked, but also are not accounted for more than once. The following phases should be followed when undertaking an OSA:

        a.   Phase 1. Initiation and Decision. Decision on whether an OSA is required based on the scale and complexity of the change and its potential to impact HS&EP standards.

        b.   Phase 2. Baseline. Determine the baseline organisation against which the proposed change will be assessed.

        c.   Phase 3. Assessment. Assess the potential for the change to impact HS&EP standards (using the Army OSA template). All stakeholders, including regulators as required, should be involved in the assessment. The extent of the evidence required to support an assessment will be determined by the OSA Owner, but examples are provided within the templates that are available on the <u>Army Safety Centre | Defence Connect (mod.uk)</u>.

        d.   Phase 4. Submission. Submit assessment to OSA Owner for review and AP acceptance. The submission should also include all appropriate stakeholders.

        e.   Phase 5. Implementation. Change implemented.

        f.   Phase 6. Review. The OSA should be reviewed at regular interval through the change process to ensure that the assumptions that underpinned it remain valid. Any deviation from the scope of change proposed in the OSA should necessitate a full/partial update and re-assessment of the OSA.

g.   Phase 7. Closure. The OSA should only be considered closed when all change has been completed and residual risks have been fully mitigated or transferred to being managed through 'business as usual' risk management processes within the organisation. It is good practice to notify all stakeholders that an OSA has been closed.

12.   Governance and Audit. It is an Army responsibility to oversee and audit OSAs as part of the change process documentation and may also be called forward by external auditors. An OSA and associated documentation shall be retained for a minimum period of five years after the change programme has migrated to business as usual.

13.   Advice and External Engagement. The Army's Strategic Centre will initiate OSAs as part of the Implementation Order (IO). Where regulated activities are affected by the change then the relevant Defence regulator should also be involved from the outset so that they can advise on regulatory compliance accordingly. The ASG-SC is also able to advise on the appropriateness of the OSA to the scale of organisational change taking place and whether further engagement is required throughout the change process, further info can be found on ASG Defence Connect or by contacting ASCen-Mailbox@mod.gov.uk.

Chapter 10

Force Protection (SHEF) Investigation

Additional references.

A. [The Management of Health & Safety at Work Regulations 1999](#).
B. [Defence_Safety_Authority_01.1_-_Regulations](#).
C. [JSP 375, Chap 16 - Investigations](#).

Introduction

1.   The Management of Health & Safety at Work Regulations – Reg. 5; places a general duty on the MOD to record and investigate the immediate and underlying causes of all occurrences to ensure that remedial action is taken, that lessons are learned, and longer-term preventative measures are introduced to support, sustain, and develop the Army's operational effectiveness.

2.   While the unfortunate will always happen, this is usually the exception rather than the norm with the majority of occurrences being caused by one or more of the following contributory factors:

      a.   Overconfident.

      b.   Complacent.

      c.   Unsupervised.

      d.   Ill-disciplined.

      e.   Untrained.

3.   The Army is mandated by legislation to investigate all occurrences of whatever nature and has now adopted an initiative-taking learning investigation principle of not 'if an occurrence should be investigated' but 'why it shouldn't?' As part of the Army's drive to improve our learning, operational performance, and the delivery of the Army's outputs as well as to adhere to the Management of Health and Safety at Work Regulations 1999. These require employers to plan, organise, control, monitor and review their health and safety arrangements with HSE guidance and the intent of Regulation 5 that "health and safety investigations form an essential part of this process".

4.   Outcomes. An investigation should follow the FAIR model with 3 potential outcomes:

      a.   Recommendations. A recommendation constitutes an immediate action and is intended to prevent a reoccurrence. Good practice is also to include proposed closure criteria.

      b.   Learning. Learning will be identified and may be evidenced by recommendations (as above). Learning will be in 2 parts: Lesson Identified leading

to a Lesson Learnt. The format should follow the NATO STANAG of Observation, Discussion, Recommendation, Conclusion. Good practice is also to include proposed lesson learnt success criteria.

c.   Good Practice. Detail of Good Practice identified after all issues have been listed, any good practice should be noted and shared using the format Observation – Discussion – Conclusion.

Part 1

Approach

5.   Investigations. To enhance learning, the Army has moved to a positive investigative approach to all safety occurrences based on the principle of 'why should an occurrence not be investigated?'. However, responsibility for investigating all MOD fatalities and specified occurrences falls to the DAIB. If the occurrence meets the DAIB threshold for investigation, they will conduct the investigation informing the appropriate ASG-SC of the results. Irrespective of any DAIB triage, the ASG-SC will always ask the affected party to conduct an internal investigation to identify learning opportunities, using the Army's FPI methodology, which should be sent to the ARC once completed. If there is the possible requirement for a Service Inquiry the DSA will deconflict with Army Personnel Support Group (APSG) who may conduct their own Non-Statutory Inquiry (NSI) into the event. Lessons are then tracked through the quarterly Safety, Personnel, Health Integration Working Group (SPHIWG), which is attended by ASG-SC, APSG, Army Health and Wellbeing, Land Warfare Centre, and the Army Inspectorate.

Roles and Responsibilities

6.   CoC. It is a CoC decision to undertake an investigation based on learning opportunities, availability of resources and nature of the occurrence. Therefore, as part of FP (SHEF) arrangements COs, LMs and HoEs are to ensure that arrangement are in place to conduct suitable and sufficient investigations into FP (SHEF) occurrences with an appointed FPI and that the investigation is recorded on DURALS so that recommendations can be managed, and effective learning undertaken.

7.   Unit. Unit investigations are the starting point for learning and must be incorporated into appropriate Minor and Near Miss occurrences using a qualified FP (SHEF) Investigator (FPI). These should be completed within 10 Working Days (WD) of the occurrence date. The investigation results - finding, observations, to prevent a reoccurrence (recommendations) and lessons identified must be recorded on DURALS. Other investigations may also be requested by other agencies such as DE&S, DFR or APSG using DURALS to ensure coherence and continuity of the investigation, findings, and outcomes.

8.   Fmns. Where reporting or investigations indicate an emerging trend or theme, fmns are empowered to undertake an appropriate investigation using available evidence.

9.   Recording. All investigation reports must be recorded on DURALS to aid accessibility, exploitation, and learning.

10.   Training. The FPI cse is designed to train nominated individuals in the techniques to undertake a simple investigation (Minor and Near Miss) with advice and guidance available from the ASIT. The FPI cse is available on demand at the point of need through the assigned AFPA.

Specialist Investigations

11.   ASIT. The ASIT provide the Army specialist FP (SHEF) investigative capability. They are tasked through the ASG-SC to investigate where the occurrence has been identified as serious or one requiring more detailed analysis.

12.   Environmental Health. All environmental health occurrences such as asbestos, air quality. Legionella or infection control will be conducted by the Army's Environmental Health Practitioners (EHP) who are part of Army Health. The requirement and conduct of EHP investigations will be initiated, coordinated, and conducted by the EHPs within respective Commands. Where there is a need for an inter-Command investigation this will be coordinated through the ASG-SC in conjunction with Army Health.

13.   OME. All occurrences involving OME, including ammunition, will be investigated by ATO.

14.   Maritime. The Chief Maritime Officer (Army) is responsible for any specialist investigative activity involving Army maritime activity. This may be conducted by the ASIT, AMIAT, DMR or the National Maritime Agency.

Part 2

15.   Levels of Investigation. Noting that the investigation is partially fulfilled by the completion of a DURALS OR, most occurrences will still require a more detailed investigation and the completion of a DURALS investigation report to gain maximum understanding, identify prevention measures and highlight learning opportunities. The DURALS levels 1 – 6 plus specialist are aligned to the CoC in accordance with the Defence levels of investigation at Table 10.

Level	Organisation	Responsibility	Completion Time[138]
1	Unit	Minor and Near Misses	10 WD
2	1* / OF5	Trends	60 WD
3	2*	Themes	120 WD
4	3*	Trends and Themes	180 WD
5	4* (ASIT)	Serious	20 WD
6	Defence	Specified and fatalities	20 WD
S	Specialists	IPT / EHP / MD	20 WD

Table 10. FP (SHEF) Investigation Completion Timelines

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[138] The Completion time is dependent on resources and nature of investigation requiring appropriate management by the appointed DURALS Occurrence Manager.

16.   **Investigation Timelines**. It is imperative that investigations are conducted as soon as possible after the occurrence to identify any immediate actions that may be required to prevent re-occurrence, as well as to capture useable evidence to support Army learning. This should happen as quickly as possible on the unit's own initiative despite a higher-level investigation also being conducted; noting that the intent and therefore focus of investigative action will be different. All Army investigation activity must be managed through DURALS and will be reported as part of the Army's FP (SHEF) assurance activities in the AAR. For **Level 1** (Unit) investigations the Army's investigations escalation timelines are at Table 11.

Timeline	Cumulative Timeline	Responsibility/Elevation
2 – 48 hrs	2 WD	Occurrence Report Unit
10 WD	10 WD	Failure to complete will result in a reminder to the unit 2IC/Adjt.
5 WD	15 WD	Failure to complete will result in a reminder to the unit 2IC/Adjt.
5 WD	20WD	Failure to complete will result in a reminder to the unit CO/HoE.
5 WD	25 WD	Failure to complete will result in a notification to the Bde and Fmn SHE/FP
5 WD	30 WD	Failure to complete the investigation by this time will have negated the utility of the investigation and the request/outcome will be archived.

Table 11. The Army's Investigations Escalation Timelines

Chapter 11

Safety and Environmental Management System

(SEMS) Assurance[139]

Additional references:

A.   JSP 815 - Defence Safety Management System.
B.   JSP 816 - Defence Environmental Management System.
C.   JSP 426 - Defence Fire Safety & Risk Management Policy, Guidance, and Information.
D.   ACSO 4001 - The Policy for Army Assurance.
E.   ACSO 9001 – The Army Policy for Audit and Inspection[140].
F.   ACSO 9016 – The Army Policy for Army Safety and Environmental Management System Audit (ASEMSA)[141].
G.   ACSO 9018 (Physical Development Audit).

Introduction

1.   Defence requires the Army to submit an annual SEMS AAR on behalf of CGS which is endorsed at AHSEC 1 and prepared by the ASG-SC. The report is compiled iaw additional Refs A to C with an expanded Element 4 to include Safety, EP and FSM.

2.   Definitions:

　　a.   Assurance. Assurance is 'an evaluated opinion, based on evidence gained from review of an organisation's governance, risk management and internal control framework'[142].

　　b.   Audit. An audit is a 'systematic, independent and documented process for obtaining objective evidence and evaluating it…'[143]. All audit activity should be focussed on providing advice and assistance to Commanders/Head(s) of Establishment (HoE), identifying areas of risk that will inform their risk management process; audit should encourage good practice and inform a continuous improvement cycle. As an audit is conducted against a published standard, auditors do not necessarily need to be Subject Matter Experts (SME). In audit, there may be a degree of subjectivity[144].

　　c.   Inspection. An inspection is a formal examination or review of performance and outputs, designed to assess effectiveness and to ensure fitness for purpose and defined as a 'determination of conformity to specified requirements'[145]. The requirement for inspection will normally be imposed by national or international

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[139] Includes Army FSM assurance.
[140] Link not included due to the annual review cycle.
[141] Link not included due to the annual review cycle.
[142] JSP 525: Corporate Governance, Part 2 (Beta V1.0), July 15.
[143] ISO 9000:2015(E).
[144] Less for financial audit, which is an objective examination and evaluation of the financial statements to make sure that the records are a fair and accurate representation of the transactions they claim to represent. It can be facilitated internally at unit level by a suitably trained officer, or externally by an outside agency.
[145] ISO 9000:2015(E).

legislation or by a licensing authority in order to licence an activity, capability, or facility. Unlike an audit, it is objective. An inspection usually results in a pass/fail grade and should be conducted by an SME.

3.   Assurance Levels. Assurance is an outcome generated from analysis of established practices within Defence at additional Refs A - G as well as DSA Regulatory regimes[146] articulating the utilisation of LoD assurance to provide the framework for identifying the overall level of assurance provision. The definitions of the various levels of LoD are:

a.   1LOD is Self-Assessment. 1LOD equates to 1st party (internal) assurance (1PA) conducted by those responsible for delivering output. First party assurance audits are often called internal audits. This is when someone from the organisation itself will audit a process or set of processes to ensure it meets the procedures or regulations that the higher organisation has specified. This person is acting on behalf of the entity itself rather than as an assured organisation or certification body. This audit is focused on the organisation's processes iot meet the requirements of a standard, and all rules the entity has set for itself. The audit will look at the effectiveness of the organisations delivery plan.

b.   2LOD is TLB Assurance. 2LOD equates to 2nd party assurance (2PA) and is conducted by an external body intended to provide CoC oversight to ensure compliance and is achieved through audit of the effectiveness of control of risks and internal frameworks. A second party assurance audit is when an organisation with a personal stake ie SDH, performs an audit of a DDH or similar receiving organisation, to ensure that they are meeting the requirements specified in the regulation or orders. The SDH or higher organisation can audit all or part of the delivery plan; whenever they see a need to audit.

c.   3LOD is Independent Assurance. 3LOD equates to 3rd party assurance (3PA) and is conducted by an organisation that is separate from and maintains no personal stake in (so far as practicable), the activity or output being assured). A third-party assurance audit occurs when the higher-level independent organisation has decided that organisation under which it has responsibility to regulate requires further analysis.

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[146] Defence Safety Authority 01.1 - Regulations.

Part 1

1.   Army assurance is the responsibility of Director Resources (DRes), Army HQ[147] and is in part dependent on an effective A&I regime with HQ HC designated as the Army A&I CA[148] and sub-delegated to HQ RC for delivery. This framework is further complemented by other assurance activities such as the Land Equipment Inspection (LEI) regime and Army Maritime assurance. The Army Competent Advisors and Inspector (ACAI) body identify 'weak signals' across the Army, with SEMS assurance being directed and reviewed by the AHSEC.

2.   Chain of Command. Commanders at all levels are responsible for ensuring compliance with Statutory and Service regulations and requirements. In addition to those responsibilities outlined in additional Ref A - C Commanders are to:

        a.   Ensure that the Self-Assessment reports are completed within the timelines in ACSO 9016.

        b.   Validate the accurate completion of the annual ASEMSA QS for Self-Assessments.

        c.   Verify that it reflects the status of their compliance.

        d.   Where a Commander is unable to comply with Service and Statutory requirements the Commander is responsible for employing suitable process mitigation to ensure the risk is ALARP. These processes must be staffed up the OPCOM CoC with the justification and supporting paperwork to create an audit trail.

3.   Army Commands[149]. Army's Commands are responsible for:

        a.   Ensuring all fmns are captured in the A&I Demand Signal and for ensuring that the following is conducted.

        b.   1st LOD – all fmns conduct annual self-assessment.

        c.   2nd LOD – that 3*/2* HQs conduct appropriate assurance based on formal, risk-based assessments of each organisation/Unit/Gp within their AOR at a frequency of not less than once every 3 years[150].

        d.   Recording findings on ARMS.

        e.   Complete their own FP (SHEF) Delivery AARs on behalf of their Commanders using the elemental structure which are to be submitted to the ASG-SC NLT 2nd Mon in May.

4.   Fmn HQs[151]. Fmn HQs are responsible for:

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[147] ACSO 9001 - The Army Policy for Audit and Inspection
[148] As defined in AJP-3(B) – Coordinating Authority or DIRLAUTH (Direct Liaison Authority) is the authority granted to a Commander or individual assigned responsibility for coordinating specific functions or activities involving forces of two or more countries or commands, or two or more Services or two or more forces of the same Service.
[149] Utilising the HLB ASEMSA QS available on ARMS.
[150] Within the tenure of a Command Appointment ie GOC.
[151] Utilising the HLB ASEMSA QS available on ARMS.

a.   Generate the ASEMSA ADT; Conduct Full ASEMSA Audits[9] on all subordinate fmns and units commanded at OF5 and above in line with the ASEMSA programme and the trigger points at ACSO 9016.

b.   Ensure subordinate fmns and units commanded at OF5 and above complete the ASEMSA Self-Assessment in years where they do not undergo a full ASEMSA. These must be completed by 30 Nov each year.

c.   Monitor the progress of assurance for all subordinate fmns and Units at all levels for completion against the ASEMSA programme.

d.   Monitor audit reports for all subordinate fmns and Units at all levels, engaging as appropriate to ensure non-compliances and non-conformances are rectified.

e.   Review Full and Self-Assessment ASEMSA reports from subordinate fmns and Units at all levels to identify trends, weak signals, reporting these to their OPCOM Headquarters.

f.   Conduct their AAE (based upon the risk appetite promulgated by their superior formation HQ).

g.   Monitor subordinate units for Self-Assessment completion against the ASEMSA programme.

h.   Hold subordinate fmns and units to account for recording of their audit reports in accordance with the timelines given at ACSO 9016 and ensure completion before 30 Nov each year.

i.   Take action to resolve any non-compliances or non-conformances identified on 2LOD and 1LOD ASEMSA Reports.

j.   It is also considered good practice for 2* Fmns to complete their own FP (SHEF) Delivery AARs on behalf of their Commanders using the elemental structure which are to be submitted to their respective Comds NLT 2nd Mon in Apr.

5.   Brigade Headquarters and Op Gps (BOG HQs). BOG HQs are responsible for:

a.   Monitoring unit self-assessments within their AoR to inform the following year's estimate process (through ARMS).

b.   Conducting assurance of their units iaw the RC Demand Signal.

c.   Recording the findings on ARMS iaw additional Refs E & F.

d.   Submitting their AAR to their higher formation HQs NLT than the 3rd Mon in Mar.

e.   Reviewing FP (SHEF) plan annually at fmn FP (SHEF) committees.

7.   HoEs and COs. HoEs and COs are responsible for:

a.   Conducting 1st LOD (self-assessment) for military establishments/sites (encompassing all the units/lodgers on the site) within their AoR[152].

b.   Reviewing establishment/site FP (SHEF) plan annually at site FP (SHEF) committees.

8.   ASG-SC. IAW additional Ref E, the ASG-SC is responsible for delivering audit using the ASEMSA through additional Ref F. Principal tasks include:

a.   Function as the Proponent for ASEMSA including setting policy and maintaining the ASEMSA QS and ensuring consistency across the Army's assurance (and A&I).

b.   Deliver the Army ASEMSA Management Information (MI) to the Army Health, Safety and Environmental Committee (AHSEC).

c.   Provide Army ASEMSA return into the biannual Army Competent Authority and Inspector report and Compile the Army Annual Assurance Report (AAR) on behalf of DCGS.

d.   Support the Army's assurance reporting activity such as QPRR[153], Army Competent Advisors and Inspectors (ACAI)[154] and the Army Audit and Risk Assurance Committee (AARAC)[155].

e.   Support the Army's Safety, Environmental and Fire input into the Defence Safety and Environmental Committee (DSEC).

f.   Consult with other Defence and Army organisations such as DSA and Army Health, to ensure that other assurance activity is reported and captured.

9.   Key ASG-SC staff responsibilities are:

a.   Hd Safety (A). Hd Safety (A) is to direct the ASEMS assurance policy.

b.   CESO(A). CESO(A) is responsible for coordinating the ASEMS assurance activities and consulting with external agencies such as the DSA.

c.   SO1 Assurance. SO1 Assurance is the focal point for all ASEMS assurance within Army HQ. Particular responsibilities include management of information in support of Army SEMS governance and providing advice and guidance on the conduct of ASEMSA.

10.   Home Command (HC). HC are the coordinating Authority (CA) for all the ASEMSA audit and inspection and overseeing the Demand Signal.

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[152] Using the Unit ASEMSA QS available on ARMS.
[153] Measurement of Performance (MoP).
[154] Weak Signals.
[155] Measurement of Effectiveness (MoE).

11.   Regional Command (RC). RC is the principal delivery organisation for ASEMSA 2LOD operating in support of the CA.

12.   Regional Points of Command (RPoCs). Whilst most units are OPCOM to their own 1* formation, due to the geographic dispersion, the administrative support regarding ASEMSA 2LOD for units commanded at OF4 (and below) plus Army Cadets is delivered through the RPoCs as directed by RC using demand signal scheduling. Although, there may be occasions when a 2LOD is requested independently.

13.   Army Maritime Inspection and Advisory Team (AMIAT)[156].The AMIAT is responsible for:

a.   Conducting such inspections and audits of the Army's Maritime assets and operating procedures as directed[157].

b.   Recording their findings on ARMS.

c.   Submitting their AAR to the CMO(A) NLT than the 2nd Mon in Apr (copied to HQ RC).

14.   Findings and Recording. All audit reports must be recorded on ARMS. On receipt of their audit report, fmns and units are to review and amend their formation / unit FP(SHEF) plan with appropriate actions and timelines to address any issues identified.

15.   JAC. The Army Aviation assurance programme comprises: first party assurance (1PA), second party assurance (2PA) and third-party assurance (3PA).[158] The MAA Air Safety Management Performance Matrix (MAPM) is an optional tool that has been produced to facilitate the assurance of ASMS by 1PA, 2PA and 3PA organisations.[159] In this sense the MAA acts as certification body, they then provide assurance or certification to organisations or entities that they approve (if it is required). This can be used to give Defence the confidence that Defence Aviation activity risks are ALARP and Tolerable.

16.   DSA Regulators. The DSA, through its regulatory activities has an important part to play in FP (SHEF). Any unit or formation that receives a DSA assurance visit is to inform the ASG-SC ASAP as well as the appropriate CoC SO1 SHE/FP.

17.   Arduous Army Training (AAT). It is important that implementation of Army Arduous Training policy is assured through additional Ref G under Force Health Protection; not RPoC SO2 SHEFs.

Part 2

18.   ASEMSAs are scheduled in accordance with the Annual Assurance Estimate (AAE) process, promulgated through HQ RC's Annual Demand Signal and conducted by Bde RPoC's SO2 and SO3 SHEFs who form small audit teams. Occasionally they may be assisted by other organisations such as 2* Formation HQs or SMEs from elsewhere within the Army.

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[156] Under the authority of a Letter of Delegation from 2nd PUS.
[157] With the exception of those engineering elements assured by the LEA regime.
[158] Detailed definitions for these terms are provided within MAA0217.
[159] The MAPM and the associated report form are available for download from the MAA gov.uk MAPM site

19.   Question Set (QS). The Army (Regular and Reserves) ASEMSA QSs are reviewed and, if necessary, updated annually by 30 Sep. Once the changes have been confirmed the ASG-SC will notifying HQ HC[160] as the ASEMSA coordinating Authority by 19 Nov of the preceding year. These will then be promulgated by HS HC to HQ RC who will inform the RPoCs. Once confirmed the revised QSs will be loaded onto ARMS overwriting the previous QS in preparation for the new audit and inspection period (Jan – Dec). Army Cadets follows a similar process with responsibility resting with HQ Cadet Branch.

20.   Methodology. To deliver effective evidence-based assurance, the ASG-SC uses the Army assurance methodology to identify sources, define their contribution, and integrate them to provide a coherent, consistent, and sustainable output that is mutually supportive to the Army's wider assurance activities. The assurance draws on established practices, ie occurrence reporting, investigation outcomes and formation reports, AARAC, QPRR and ACAI[161] (weak signals) using the principle of 'report once, use many times'.

21.   Consistency. The SO1 Assurance, ASG-SC supported by SO1 SHEF Assurance, HQ HC, is responsible for monitoring and ensuring consistency of ASEMSA across the Army.

22.   Army SEMS Annual Assurance Report Structure (Army SEMS AAR). The Army SEMS AAR[162] uses the elemental approach iaw Refs A to C in a single report expanding Element 4 to include Safety, Environmental and FSM. The Army SEMS AAR is available on the Army Safety DC page and all Army Commands and formations are encouraged to use the same approach.

23.   Outcomes. An audit activity will result in an audit report. However, the CoC should bear in mind that a 1LOD is an internal management tool, and it is considered poor practice for 1LOD be used as part of the CoC performance judgement. This is a pre-requisite to drive continuous improvement approach with a judgemental approach shown to be counterproductive to an honest and open assessment. Therefore, the CoC should monitor quantity – how many 1LOD have been conducted and not comment on quality.

24.   Continuous Improvement. The Army's robust assurance regime provides a unique opportunity to deliver continuous improvement across units, fmns, HLBs and estate. Therefore, it is good practice to share the finding of assurance reports both negative and, more importantly, positive. This process being supported by a 6-monthly update to allow DCGS to monitor progress at AHSEC.

25.   Structure. The Army SEMS Annual Assurance Report (Army SEMS AAR) uses the elemental structure iaw Refs A to C expanding Element 4 to incorporate safety, EP and FSM. This evidences the Army's assurance rating, is approved by Hd Safety (A) and endorsed by CGS at the AHSEC 1. Army Commands and formations are encouraged to use the same structure[163].

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[160] SO1 SHEF Assurance and SO2 A&I.
[161] ACSO 4001 - The policy for Army Competent Advisors and Inspectorates (ACAI)
[162] Report format is available on the ASG-SC DC page: Army Safety Centre | Defence Connect (mod.uk).
[163] Report format is available on the ASG-SC DC page: Army Safety Centre | Defence Connect (mod.uk).

SECTION 4 – ACT

1.   Organisational Learning (OL). For the Army to be a truly effective force, it must continually evolve to meet a variety of threats, manage risk effectively and continuously learn. The difference between success and failure on operations is the Army's ability to learn effectively and swiftly in order to adapt to changing circumstances. However, effective learning is intrinsic to all Army activities all of the time.

2.   Review performance:

    a.   Embed a continuous improvement approach striving for success.

    b.   Learn from occurrences (accidents and incidents, ill-health data, errors, and relevant experience, including from other Organisations) and any activity conducted.

    c.   Regularly revisit plans, policy documents and risk assessments to see if they need updating.

    d.   Identify and act on observations from all activities including from audits and inspection (after activity reviews are encouraged). Develop them into a lesson identified through to them being embedded and business as usual (BAU) at that point they are therefore a lesson learned.

3.   It is vital that SHEF OL is conducted at all levels from the lowest (individual, section, and crew) up to the highest level in HQ Army. As the Army refines its lessons and learning approach, it must also be able to demonstrate that it is a Learning Organisation,[164] so all lessons activity must be captured using DURALS to provide an evidence / audit trial as well as a knowledge library for anyone to exploit. The process by which FP learning is identified, tracked, managed, and learnt is overseen by ASG-SC Organisational Learning & Lessons team within the ASG-SC supported by the Army Commands, fmns and units, all facilitated by DURALS.

4.   FP (SHEF) Training and Education (FP(SHEF) T&E). FP(SHEF) T&E provides the foundation for the Army's delivery of its DoC responsibilities as well as ensuring the Army's legislative compliance. In addition FP (SHEF) T&E seeks to embed the golden thread of Continuous Improvement through OL.

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[164] IAW with the Defence OL Strategy (DOLS).

Chapter 12

SEMS Organisational Learning

Additional references:

A.   VCDS - Defence Organisational Learning Policy Statement.
B.   ACSO 1118 - Army Lessons Process (First Revise).

Introduction

1.   The ability for the Army to learn quickly and effectively could be the difference between mission success or failure. To achieve this the Army has adopted an OL approach that, for FP (SHEF), will drive:

   a.   Continuous Improvement. Learning matters because it empowers everyone to make better development decisions and achieve greater impact.

   b.   Efficiency. Efficient learning along with the ability to exploit it will help stop isolated or stovepipe actions that merely reinvent something, add more policy, or repeat a previous action. Thus preventing wasted time, energy, and resources. It will also ensure that efforts are focused on maximum benefit.

   c.   Engagement. OL should be undertaken using a whole force approach by engaging the workforce, encouraging participation especially Learning from Experience (LfE) in order to move into a pre-emptive space and strengthen the Army's operational capability.

   d.   Humility. Institutionalising curiosity using a whole force approach – recognising that the lived experience is key; differing contexts, how change happens, and how best to go about achieving results.

2.   At its core, OL should answer some basic questions:

   a.   What do we need to know in order to be effective and enlightened?

   b.   How will we create, acquire, analyse, share, and use our knowledge?

   c.   Who will do what to ensure we create, acquire, analyse, share, and use our knowledge?

   d.   How will we resource and reinforce these practices within our organisation?

Part 1

Approach

1.   The Army's FP (SHEF) OL approach uses DURALS and is based on three key processes:

> a.   Knowledge creation. This is outcome of the Army's activities be that in-camp, training, or operations. It has both an informal component primarily from the LfE which should be captured on the DURALS using a Portable Electronic Device (PED) and formal elements such as DURALS ORs, DURALS investigation Reports as well as Service Inquiries.

> b.   Knowledge retention. By using DURALS as an active learning platform, the Army has the ability to use a data driven approach to categorisation and retention across all domains.

> c.   Knowledge transfer. DURALS facilitates both a bottom up and top-down approach to supporting OL activity. For bottom up it allows units to action learning activities and outcomes within their AOR or the ability to escalate if this is not possible. For top down it allows fmns, commands and ARMY HQ to oversee learning activity while exploiting learning at the appropriate level.

Roles and Responsibilities

2.   CoC. As with most things, OL will only be successful giving the Army its battle winning edge if the CoC are engaged and motivated. However, it is recognised that while the CoC needs to be cognisant of the outcomes and impact, to deliver OL effectively requires both a supporting IT platform – DURALS and a competent person to engage and audit who should be the Organisational Learning Lead (OLL).

3.   OLL. The OLL acts as the DURALS OL gatekeeper whose principal tasks are:

> a.   Conducting the initial triage of any recommendations (an immediate action intended to prevent a reoccurrence) and /or Lesson Identified[165] to ensure it is valid.

> b.   Allocates the AP who:

>> (1)   Conducts 2LOD on recommendation closure or lesson learnt.

>> (2)   Transfers to the knowledge exploitation library (assured knowledge).

> c.   AP – the person accountable for that activity who will:

>> (1)   Review the recommendation (an immediate action intended to prevent a reoccurrence) and / or Lesson Identified from a wider perspective.

>> (2)   Endorse the Action Plan.

>> (3)   Conducts 1LOD of recommendation closure or lesson learnt.

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[165] Using NATO STANAG (ODCR).

  d.   Proponent[166] – the person responsible for that activity who:

      (1)   Develops the Action Plan.

      (2)   Identifies a Deliverer.

      (3)   Monitor Progress.

  e.   Deliverer – implements the Action Plan keeping the Proponent updated.

4.   Army FP (SHEF) OL Delivery. The OLL must ensure that a suitable internal mechanism exists within the CoC, such as Command Board, to raise awareness of FP (SHEF) OL such as emerging trends or themes along with any remedial or pre-emptive action required to address FP (SHEF) concerns. They are to use DURALS to record and manage their OL activity supported by the Military Judgement Panel (MJP) process where appropriate. In order to inculcate participation and success, all OL communication should be both vertical and horizontal as shown in Fig 18:
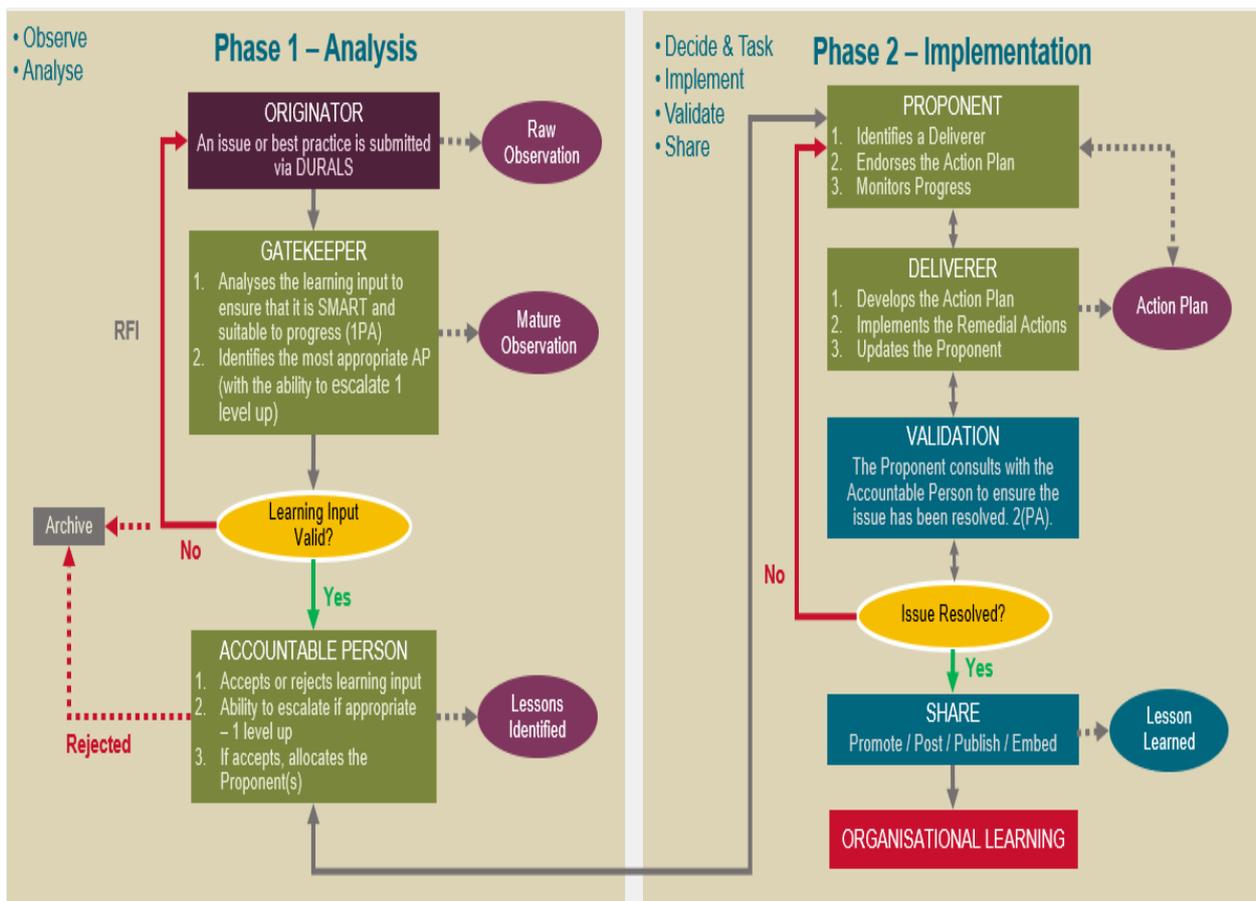
Figure 18. Army FP (SHEF) OL Delivery Flow

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[166] Depending on the complexity the proponent could also be the Deliverer.

5.   Units. All units must appoint an OLL at regimental level who could be the Regimental Operations or Training Officer. They should be supported by sub-unit OLLs thus creating a network to enact and deliver OL across all areas and activities.

6.   Fmns. Fmns are the key deliverer of FP (SHEF) OL addressing individual or grouped occurrences within their fmns and must appoint an OLL usually the SO1 FP (SHEF).

7.   Army Commands. OL must be command led with the Army Commanders having a pivotal role to play within the FP (SHEF) OL process providing the bridge between their fmns and ARMY HQ if it a broader lesson can be drawn or it is a systemic issue which, by default, is likely to be policy issue. All Army Commands must appoint an OLL usually at OF5 level who will be supported by their Command SO1 FP (SHEF) or equivalent and who will function as the DURALS OL Gatekeeper.

8.   The OLL must ensure that a suitable internal mechanism exists within the CoC, such as Command Board, to raise awareness of FP (SHEF) OL such as emerging trends or themes along with any remedial or pre-emptive action required to address FP (SHEF) concerns. They are to use DURALS to record and manage their OL activity supported by the Military Judgement Panel (MJP) process where appropriate. In order to inculcate participation and success, all OL communication should be both vertical and horizontal.

9.   Army HQ. Army FP (SHEF) OL at an organisational level is delivered by the ASG-SC who also oversee and audit subordinate OL activity. The OLL for the ASG is Hd Safety (A) supported by AH Safety (A) for Functional Safety and DH Cap Safety Ops for capability safety. However, the OL coordinator and DURALS OL gatekeeper is SO1 FP (SHEF) OLL supported by SO2 FP(S) OLL. The ASG principal tasks are:

   a.   To identify and evidence emerging themes or trends at the 4* level along with the development of an appropriate action plan where applicable.

   b.   To develop and maintain the Army's FP(SHEF) continuous improvement plan at the 4* level ensuring that it is linked to subordinate continuous improvement plans for supporting directorates such as APSG and the Army.

   c.   To identify, promulgate and exploit FP (SHEF) good practice, recommendations and lessons identified across the Army in a timely and effective manner.

   d.   The arrangement, organisation, and delivery of ASG OL MJPs as appropriate to investigate identified themes and formulate and agree the lesson/observation with the relevant stakeholders and SMEs including the identification of appropriate APs.

   e.   To oversee the OL functionality within DURALS for all FP(SHEF) activity and to monitor Army progress of any recommendations and / or lessons identified at 4* level.

   f.   To function as the Army focal point for all Service Inquiries, Non-Statutory Inquiries, Coronial inquests (where appropriate) and support to external agencies such as the HSE.

Part 2

10.   Sharing Good Practice. It is increasingly recognised that the vast majority of Army activity happens effectively and safely but is often overlooked. Therefore, one of the key aspects of effective OL is to understand why things went well and to build on this by sharing good practice. Consequently, the circulation of GOOD PRACTICE by knowledge sharing requires an understanding of the target audience(s) (when and what is required and in what format) and a means of sharing (both push and pull) as well as a mix of physical and electronic activities to be effective. This should be done using DURALS for targeted engagement, 'safety moments' within command groups and organisational briefings and reward and recognition such as the Army Safety and Environmental Awards (ASEAs).

11.   Evidence Capture. To ensure validity and avoid re-visiting previous learning it is important that suitable and sufficient evidence is gathered at the appropriate level. While this happens naturally in the course of events, it is not always recognised as a learning opportunity with examples being:

a.   Before Action Reviews - the forgotten cousin of the After-Action Review! This is a great exercise before an activity, especially if a lot of time has passed since the AAR to solidify the learning and ensure it gets incorporated into the new activity.

b.   Business Process Reviews - a great methodology to discuss how things are going, reflect as a team on emerging lessons and challenges, and to strategize on how you can strengthen your effectiveness in the months to come.

c.   Strategic Decision-Making Process Flow – using this flow to help break down decisions to account more holistically for what is known and adopting a 'wrap around approach' to draw out decision making into a multi-step process.

d.   Strategy Triage Tool - a simple five-square matrix useful for reflecting on strategic learning.

e.   Information Sharing - reading something (a short article, blog, or book) and discussing it as a team. This allows your team to make meaning of what you read together and discuss important implications for your work.

f.   Reflective Pauses - the purpose of this exercise is to learn through listening to others' thought processes by having team members reflect on a topic, for example, a learning question, and having the rest of the team observe from the outside.

g.   What? So What? Now What? - a methodology that encourages participants to reflect together and share new insights. It is great for guiding decision making.

h.   "How Might We…" Statements - a user-centred design technique that can be applied in teams to encourage generative learning. It helps us to pause and explore different solutions instead of just jumping to the most familiar one when presented with a problem.

i.   "I Like, I Wish, I Wonder" - a simple methodology to guide learning group sessions focused on generating actionable insights.

12.   Management Information (MI). To support Continuous Improvement through OL activity suitable and sufficient MI is required to support the CoC evidenced based decision-making examples of which are shown in Fig 19:
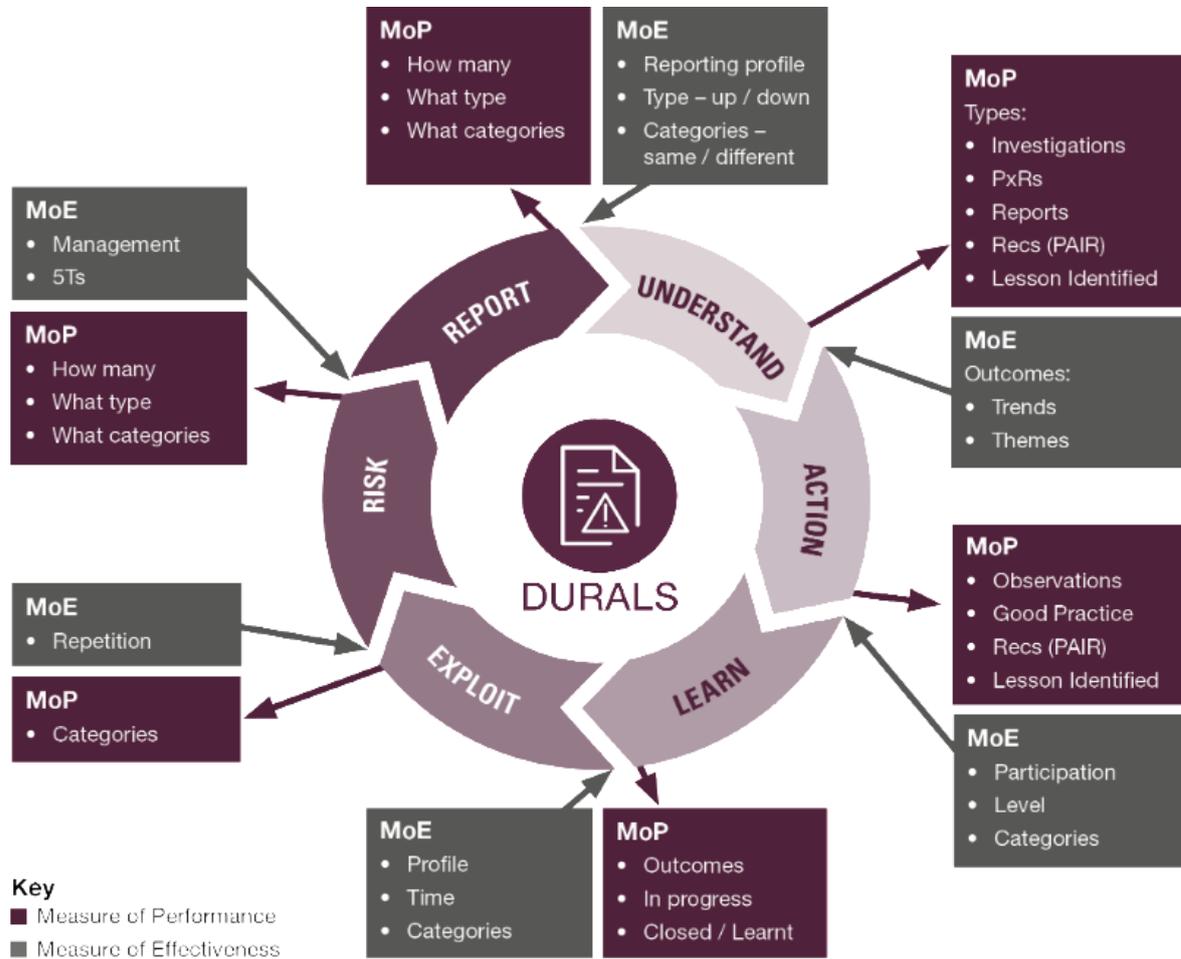

Figure 19. Management Information schematic

Chapter 13

Army Force Protection (SHEF) Training and Education

Additional references:

A.   Training and Education (JSP 822) - Home (sharepoint.com).
B.   The Compendium of Mandated Training (CoMT).
C.   ABN_024_2023_Notification_of_Force_Protection_Investigator_Course.

Introduction

1.   The aim of the Army's FP (SHEF) Training and Education (FP (SHEF) T&E) is to provide a foundation on which the Army can not only deliver its DoC responsibilities, but also underpin and support operational capability through Safety Risk Management (SRM) and OL.

2.   FP (SHEF) T&E aims to promote a 'Through Career' approach using a whole force approach with the skills gained throughout a career adding to Service Personnel's (SP) portfolio of qualifications, including civilian accreditation. Unit FP (SHEF) T&E is based on 3 pillars: Safety Risk Management, Environmental and Facilities Safety Management and Fire Safety Management at 3 levels; Advisor – Offr at Regt/Bn HQ level and at Fmn where required, Manager – WO/SNCO at Bty/Sqn/Coy level and Practitioner – for specific responsibilities. All FP (SHEF) training is delivered using a principle of 'on demand and at the point of need', whilst FP (SHEF) education is on a programmed basis with the delivery mechanism being:

   a.   Advisor – at unit and fmn level with education delivered at Defence College of Support (DCSp), Specialist Training Squadron RAF Halton (STS Halton) and the Defence Fire Training Unit (DFTU) at Morton-in-Marsh.

   b.   Manager – at sub-unit level with training provided by AFPAs using the principle of 'on demand at the point of need'.

   c.   Practitioner – at sub-unit level through Manager/Unit Trainer/AFPA.

Part 1
Approach

1.   Requirements: All Army FP (SHEF) mandated training requirements that units are to comply with are contained in additional Ref B less for FP (SHEF) specialised training or education that is provided by an external source.

Roles and Responsibilities

2.   ASG-SC. ASG-SC is the Army Professional Standards Authority (APSA) for all of the Army's Functional Safety ie FP (SHEF) training and education. The ASG-SC is specifically the Training requirements Authority (TRA) for Fire Safety Management and all cses that are delivered via an internal means such as through AFPAs.

3.   CoC. All the Army units and fmns must appoint suitable and sufficient personnel iaw with Ch 2.

4.   Eligibility. Army FP (SHEF) training and education is available to any MOD personnel (military or civilian) under a priority order as shown in Table 12:

Priority	Description	Comment
1	Army Military personnel about to be or appointed to a role	IAW Posting Instructions Force Generating Order Fmn/unit FP (SHEF) Delivery Instruction
2	Army Civilian personnel about to be or appointed to a post	IAW Posting Instructions Force Generating Order Fmn/unit FP (SHEF) Delivery Instruction
3	UK Strat Com Personnel about to be or appointed to a post	IAW UK Strat Com SEMS
4	RN or RAF personnel about to be or appointed to a post	As applicable
5	Enabling Organisations about to be or appointed to a post	As applicable

Table 12. Army FP (SHEF) T&E Eligibility

5.   Army Safety Champions. The Army Safety Champion Workshop is an educational event intended to support those personnel (military and civilian) appointed as a 'Safety Champion' at Fmn level and above. It is run 3 times per year with cse loading directly by SO2 Trg & Assurance, ASG-SC; it is not intended for unit personnel.

6.   Authorisation. The CoC is responsible for authorising attendance of personnel within their AOR. In the event of a **no-show**, the Army may seek to recoup the cost from the individual or the unit.

7.   Competence. All ASG-SC cses have an associated joint competence which is valid for a minimum of 5 years unless specified otherwise. The unit HR should administer these.

8.   Funding. All internal cses are funded centrally through the ASG-SC. This also applies to some specialist appointments such as the ASIT. However, if Commands, fmns or units wish to go outside or beyond that the cses provided by Army FP (SHEF) T&E then the costs fall where they lie e.g. Organisational Learning Lead (OLL).

9.   Delivery. AFPAs are responsible for the delivery of Manager and, if appropriate Practitioner, level training using the delivery principle of 'on demand at point of need' be that unit, Op Gp, formation or location. This should be demand led, coordinated by the AFPA regional leads, and overseen by the ASG-SC.

10.   Cse booking. This is conducted in the first instance through the ASG-SC event booking tool on the Army Safety Centre | Defence Connect (mod.uk). However, in some instances it may be direct to the Defence College or external provider.

11.   Certification. For internal cses, the appointed instructors, usually AFPAs, will provide the cse certificates to successful candidates using the Army template which are available through the ASG-SC SP site.

12.   Accreditation. All Army FP (SHEF) T&E has appropriate civilian accreditation through the Defence Awarding Organisation (DAO). The accreditation being available for membership of appropriate professional body under the Army corporate membership scheme. Accreditation certificates will be issued by the cse instructor in the first instance. If this is not possible for example the Army Safety Champion award, then the ASG-SC will issue the accreditation certificates.

13.   Representation. The Army representatives for all Army FP (SHEF) training and education is the AH Safety (A) supported by DH S(A) and SO2 Trg & Assurance, ASG-SC. However, this may be delegated as appropriate and necessary to other staff posts across the Army.

14.   Assurance. The audit and assurance of all Army FP (SHEF) T&E is the responsibility of the SO2 Trg & Assurance, ASG-SC. SO2 Trg & Assurance is also the principal interlocuter between the ASG-SC and additional Ref B.

Part 2

15.   Arbitration. In the event of arbitration over, for example, attendance priorities, the ASG-SC will conduct this; SO2 Trg with any appeal escalated to the DH S(A).

16.   Advice and Guidance. If further clarification is required, units should contact ASG-SC - ASCen-Mailbox (MULTIUSER) ASCen-Mailbox@mod.gov.uk.

List of Figures and Tables

Table 13. List of Figures and Tables