



Ministry  
of Defence

Directorate of  
Defence Safety

# Defence Safety Function Operating Model

April 2024



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# Foreword by Director of Defence Safety and Defence Safety Function Leader



Safety is at the heart of everything we do in Defence. The Ministry of Defence (MOD) exists to protect the people of the United Kingdom, prevent conflict, and be ready to fight our enemies. A key enabling factor to achieve this is to ensure we keep our people, equipment, process and places safe. Safety is not a spectator sport; it is a core responsibility of everyone in MOD.

The commitment to keep people safe at home and overseas, meeting our legal duty of care, has been set by the Secretary of State for Defence in the [Health, safety and environment policy statement](#). This policy statement sets out the role of Defence organisation leaders (Service Chiefs, Chief of Defence Nuclear and Chief Executives of enabling organisations) to ensure and assure that health, safety and environmental policies and regulations are applied throughout MOD.

The Defence Safety Function includes all those activities related to safety that take place across MOD. Within the Defence Safety Function, Directorate of Defence Safety (DDS) is responsible for setting the policy, strategy governance and risk frameworks for safety in MOD and is the owner of the Defence Safety Management System (SMS) and the underpinning safety policy.

A handwritten signature in black ink, appearing to be 'Emma Austen', written in a cursive style.

**Emma Austen**

**Director of Defence Safety**

### Purpose

This document explains how the Defence Safety Function operates within MOD and key roles and responsibilities. It sets out the framework to ensure health and safety is embedded and appropriately applied across MOD with risks identified and managed, in line with the Defence Plan and the Defence SMS.

### Scope

This Defence Safety Function Operating Model for the Defence Safety Function replaces the previous Health Safety and Environmental Protection (HS&EP) Function Operating Model for the HS&EP Function. From 1 July 2023, responsibility for Environmental Protection was transferred from Director HS&EP to Director Climate Change & Environment (CC&E) (previously known as Levelling up, the Union, Climate Change and Sustainability). Consequently, the HS&EP Function became the Defence Safety Function (covering health and safety), and Director HS&EP became Director Defence Safety (Director DS) heading DDS. Director DS remains head of the Safety and Environment Profession.

The Defence Safety Function Operating Model and DDS safety policy:

- applies to all those employed by Defence (military and civilian) including those under the age of 18 (for example recruits and apprentices).
- applies to those working on behalf of, or under the supervision of Defence (for example, contractors or visitors).
- applies to all Defence activities carried out in any location (UK or overseas).
- is not written for young persons in the cadet forces, Defence-run schools, nurseries and so on; those organisations must maintain their own safety policies and governance and must provide statutory compliant infrastructure and appropriate safe systems of work. They may use DDS as a reference point, but where appropriate their respective policies should be adapted to meet the needs of young persons and to follow any applicable Department for Education guidelines or legislation.

### Terms and definitions

The term 'safety' is used throughout this Operating Model and is defined as the state of being protected from danger or harm. Safety in this context encompasses health by providing safe systems of work, including safe places, people and equipment, thus protecting people from harm and ill-health. However, there will be some references to health and safety where statute (for example the Health and Safety at Work etc Act 1974 (HSWA74)) or Defence policy and regulation defines them. 'Wellbeing' is an adjacent policy area and the responsibility of the People Function.

The term 'Defence' refers to the Ministry of Defence (MOD).

The term 'Defence organisations' refers to Military Commands, Head Office, Defence Nuclear Organisation (DNO) and Enabling Organisations (EOs) collectively.

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# 1. Leadership, culture and governance

# Guiding principles

## Leadership

### Departmental

- The Secretary of State (SofS) for Defence is accountable to Parliament for safety in MOD.
- The Second Permanent Secretary (2PUS) is accountable to SofS for ensuring effective safety management arrangements are in place.

### Functional

- DDS has responsibility for Safety Functional Leadership, cohering functional risk and policy across MOD, on behalf of the Chief Operating Officer (COO), the Function Owner.
- DDS owns the Defence Safety Functional Strategy, this Defence Safety Function Operating Model and the overarching Defence Safety Management System (SMS).
- DDS is responsible for the corporate governance of MOD safety, on behalf of 2PUS.
- DDS works with CC&E to ensure continued alignment between the approaches for safety and environmental protection within MOD.
- DDS supports the consideration of safety in acquisition with Director DS as an adviser to the Investment Approvals Committee supported by the DDS Acquisition Safety Cell.

### Defence Safety Authority (DSA)

- DSA has operational independence from the delivery of MOD activity, as set out in the DSA Charter.
- The DSA leads on Defence safety regulation, within the SMS owned by DDS on behalf of SofS, and as described in its Charter, and provides independent assurance to SofS through 2PUS.
- DSA is the primary convening authority for safety related Service Inquiries (SIs) and carries out independent safety investigations.

### Governance

- The Defence Board is responsible for the top-level leadership and management of MOD, including for safety matters.
- The Defence Safety and Environment Committee (DSEC) is the main committee responsible for the governance and assurance of safety. The DSEC is chaired by 2PUS.

## 1.1 Leadership

### Departmental

The SofS for Defence is accountable to Parliament for safety in MOD. SofS's Health, Safety and Environment Policy Statement sets out MOD's legal obligations and what the SofS for Defence requires from individuals, commanders and line managers. In practice SofS may choose to delegate day to day ministerial oversight to a junior Minister (currently Minister of State for Defence in the House of Lords).

As MOD's most senior official for safety matters, the 2PUS makes sure that effective management arrangements are in place to comply with SofS's Health, Safety and Environment Policy Statement.

### Defence Safety Functional Leadership

All functions are managed by a framework of Functional owners, with specific authorities and accountabilities for developing and implementing Functional Strategies and Functional Operating Models across MOD to ensure, efficiency, effectiveness and coherence of MOD business. The Chief Operating Officer (COO) is the Defence Safety Function owner and Director DS is the Function leader.

As the Function leader, Director DS manages the Directorate of Defence Safety (DDS), which is responsible for creating a suite of documents including the Defence Safety vision that provide MOD with direction on how to ensure the safety of our people, equipment, processes and place. The vision and the priorities designed to deliver it are set out

in the Defence Safety Functional Strategy, the Defence Safety Function Operating Model and the overarching Defence SMS (Joint Service Publication (JSP) 815).

DDS provides competent statutory safety advice to ministers, the Permanent Secretaries, the Chief and Vice Chief of Defence Staff. DDS is responsible for making sure there is appropriate recognition of safety issues in Head Office decision-making, such as during strategy, planning, investment approval, budgeting and performance and risk reviews.

The DDS Acquisition Safety Cell (ASC) maintains JSP 376 - Defence Acquisition Safety Policy. The ASC acts as the safety functional body within Head Office Approvals Decision Making, in accordance with JSP 655 - Investment Approvals. Director DS is a permanent adviser to the Joint Requirements Oversight Committee (JROC) and the Investment Approvals Committee (IAC). They also provide support to Senior Responsible Owners (SROs) and programme delivery professionals to comply with acquisition safety policy.

Given the close links between safety and environmental protection, DDS works closely with CC&E to ensure coherent policy development and governance of safety and environmental matters. CC&E is responsible for the development of MOD's Environmental Management System (EMS) and Operating Model.



## What the Safety Function does

Defence function owners and leaders – including Director DS – are responsible for developing the relevant mechanisms to support their Functional Strategy and are empowered to implement these mechanisms across MOD to drive improvement.

The mechanisms include:

- publishing JSPs setting policy for the conduct of defence business in consultation with Defence Organisations
- setting formal delivery objectives for Defence organisations, via DSEC and through the Defence Plan
- cohering and providing direction of functional risks and insight on functional performance that feeds the Defence Board Principal risk
- coherence of digital capabilities for the management of safety across defence aligned with MOD's overarching digital strategy
- giving strategic direction to Defence organisations and driving continual improvement
- ensuring safety is considered during acquisition activities
- workforce planning, to define the skills and capabilities required by the relevant function and sponsoring any relevant training
- managing the profession within MOD
- maintaining a framework against which assurance across Defence activities is conducted (including by the DSA)

## Defence organisations

Senior leaders of Defence organisations (Service Chiefs, Chief of Defence Nuclear and Chief Executives of enabling organisations) lead on safety through the responsibilities set out in their letters of delegation issued by the Permanent Secretary (PUS) (or any equivalent delegated authority). They ensure their Defence activities are delivered in line with the Defence SMS, UK legislation, Defence policy and Defence regulation, through their own SMS with appropriate funding and resources in place.

Senior leaders from the Defence organisations support Director DS through their membership of safety forums, through formal and informal

safety meetings and by making safety part of mainstream business.

Under the Management of Health and Safety at Work Regulations 1999, senior leaders of all Defence organisations must seek advice from a 'competent person' to help them. In MOD, this role is typically provided by Safety Directors, Chief Environment and Safety Officers (CESOs), or an equivalent nominated competent person. Safety Directors and CESOs work within the Defence organisations' safety centres.

Each Defence organisation has a safety centre or equivalent team to support the Safety Director/CESO to implement the strategic direction that they have set for

safety and the environment within their organisation. A safety centre is made up of individuals with the relevant safety and environmental Knowledge, Skills, Experience, and Behaviours (KSEB) to support the Safety Director/CESO to deliver the Defence organisation's SMS and to oversee compliance with MOD safety and environmental policy and regulations.

They are also the Defence organisation's point of contact for liaising with statutory and Defence regulators and are the principal point of contact to advise on the application of legislation and MOD policy within their organisation.

### Defence Safety Authority

The Defence Safety Authority (DSA) is an enabling organisation created by a [charter](#) issued by the SofS for Defence. The DSA's role is that of independent regulator, investigator, licensing authority and third line of defence assurer for health, safety and environmental protection. The charter empowers the DSA to maintain independence from those that deliver Defence outputs. Accordingly, the Director General (DG) of the DSA is accountable to SofS for Defence, through 2PUS. Where DG DSA judges that HS&EP concerns are not being satisfactorily addressed through normal Departmental processes, they retain the right of direct access to SofS to raise those concerns, while ensuring that 2PUS is kept informed.

DG DSA is responsible for providing Defence Regulators in defined areas. These are currently:

- Defence Environmental Protection Regulator (DEPR),
- Defence Fire Safety Regulator (DFSR),
- Defence Land Safety Regulator (DLSR),

- Defence Maritime Regulator (DMR),
- Defence Medical Services Regulator (DMSR),
- Defence Nuclear Safety Regulator (DNSR),
- Defence Ordnance, Munitions and Explosives Safety Regulator (DOSR),
- Military Aviation Authority (MAA).

DG DSA is also responsible for convening SIs to ensure that all HS&EP related fatalities, serious injuries, significant environmental incidents and major capability losses are appropriately investigated to make recommendations, identify lessons to minimise the risk of recurrence and promote continual improvement. This is delivered through the Defence Accident Investigation Branch. Separately, the DSA commissions themed assurance through the Defence Themed Assurance Branch.

DG DSA attends the Defence Safety and Environment Committee. The charter also mandates that the DSA prepares an Annual Assurance Report for consideration by 2PUS, the Defence Board and SofS.

## 1.2 Culture

Leaders in MOD set the strategic direction for safety, and the overall tone from the top. It is that direction and tone that influences how individuals within MOD behave in relation to safety. Those behaviours define the culture of the organisation. Senior leaders in Head Office and the Defence organisations are collectively responsible for creating and maintaining a positive and proactive safety culture within MOD.

At the most basic level, culture can be defined as **'the way we do things here'**. Defence organisations have flexibility to describe the elements of a strong safety culture using their own language.

## 1.3 Governance

Figure 1 below provides an overview of the governance arrangements for safety within MOD.

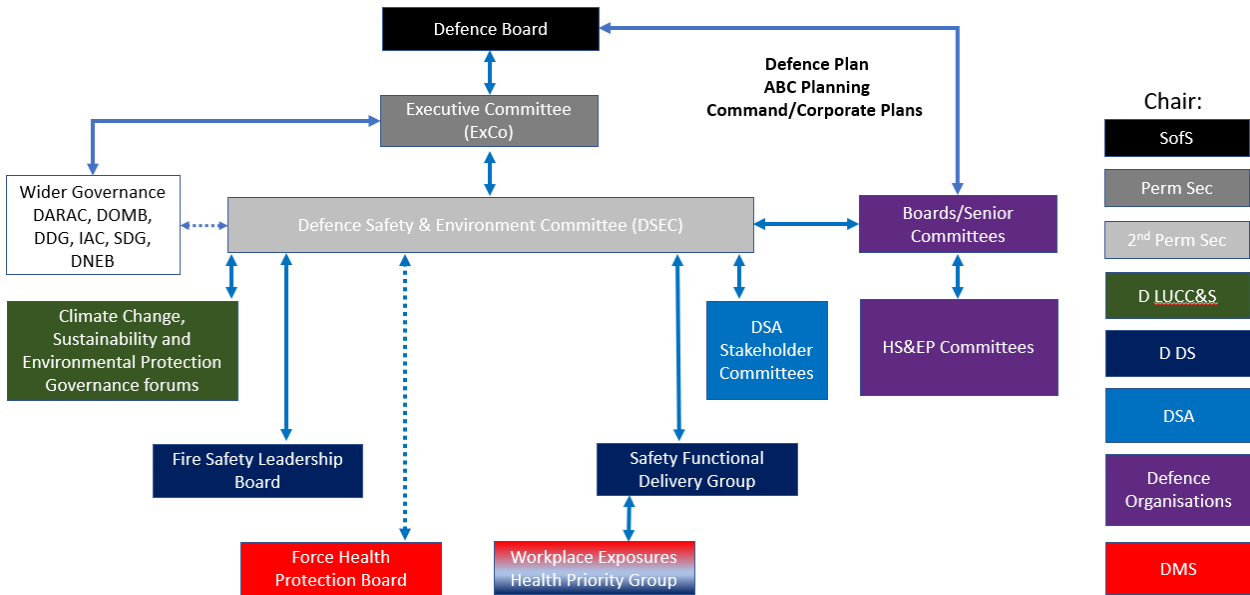


Figure 1 – Principal safety governance within MOD

### Defence Board

The Defence Board is chaired by SofS and is responsible for the top-level leadership and management of MOD. The Defence Board is the senior organisation board in Defence and the main decision-making body for non-operational matters. It advises and helps SofS and PUS in their duties, mainly by overseeing how MOD is managed, including strategy, performance, risk and plans.

The Defence Board is supported by the Defence Safety and Environment Committee (DSEC) and sub-committees. For example, the Defence Audit and Risk Assurance Committee (DARAC) is a Defence Board sub-committee that supports the Defence Board and the Accounting Officer by reviewing the

comprehensiveness, reliability and integrity of the risk assurance framework.

### Defence Safety and Environment Committee

DSEC is the principal forum responsible for safety and environmental matters and acts as the Functional Accountability Body (FAB), as required by the Defence Operating Model Board (DOMB), to oversee the strategic direction of the safety function in MOD. DSEC ensures safety and environmental matters are managed effectively through a strong governance framework and oversees the safety element of principal risk reported to the Defence Board. DSEC meetings are structured into separate safety and environmental sections and administered by the Boards Secretariat.

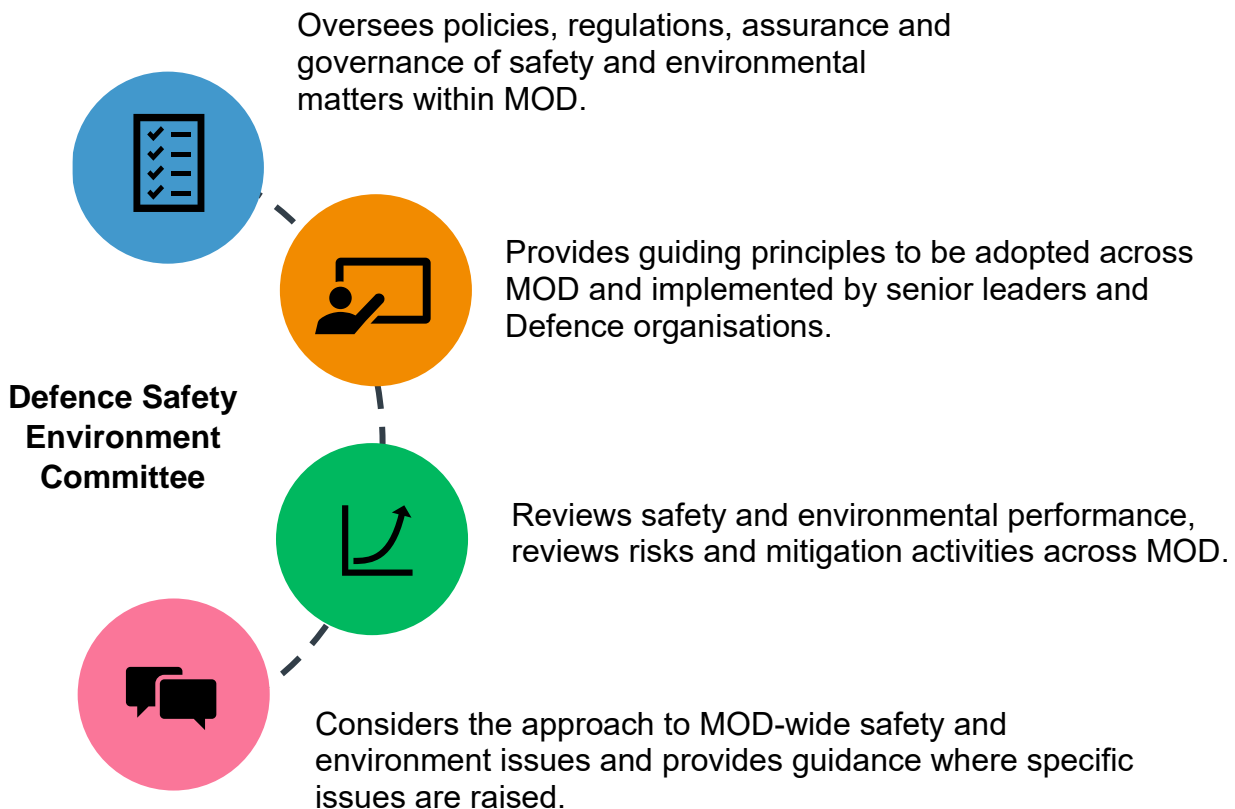


Figure 2 Defence Safety and Environment Committee role

The DSEC members are shown in the following table.

DSEC members
Second Permanent Secretary (Chair)
Vice Chief of the Defence Staff
Deputy Chief of Defence Staff (Military Capability)
First Sea Lord
Chief of the General Staff
Chief of the Air Staff
Commander UK Strategic Command
Chief of Defence Nuclear
Chief Executive, Defence Equipment and Support
Chief Executive, Defence Infrastructure Organisation
Chief of Defence People
Chief Operating Officer
Chief Executive, Defence Science and Technology Laboratory
Chief Executive, Submarine Delivery Agency
Director Defence Safety
Director Levelling up, the Union, Climate Change and Sustainability
Two non-executive directors - one with safety experience and one with environmental experience
Director General Defence Safety Authority (attendee only)

Table 1 – Defence Safety and Environment Committee Membership.

The Director DS is a member of the DSEC in order to give the 2PUS advice on safety and is responsible for co-ordinating and driving forward the work of DSEC relating to safety. DG DSA is not a member of the DSEC but attends meetings to provide independent assurance on safety and environmental risks and issues.

### **Safety Functional Delivery Group**

The Director DS chairs the Safety Functional Delivery Group (FDG). This group is the forum for discussions and consultation between DDS, senior stakeholders and safety professionals from across Defence organisations, and acts as the 'delivery body' to support DDS. The FDG considers both safety policy and the safety and environment profession. FDG acts as the Functional Oversight Group (FOG). The DOMB requires all Defence functions to have a Functional Oversight Group with stakeholders from across MOD, that supports function owners in the management of the function, and that is the primary focus for Defence organisations to escalate functional issues.

### **Defence Fire Safety Leadership Board**

The Defence Fire Safety Leadership Board (DFSLB) is a sub-committee of DSEC, chaired by Director DS and administered on their behalf by the Defence Fire and Rescue (DFR) organisation. Its role is to drive improvements in fire safety across MOD, including improvements in MOD fire safety policy, collation of management information and personnel behaviours on both the built and rural estate.

### **Force Health Protection Board**

The Force Health Protection (FHP) Board is chaired by Defence Medical Services (DMS) Medical Director, administered by DMS and reports jointly to Director DS

and the Surgeon General. The purpose of the Board is to provide strategic direction and operational guidance on the provision of Force Health Protection for UK Armed Forces on Defence Tasks and overseas travel in order to ensure that risks to health are identified and managed and that consistent and accurate medical advice is available to the chain of command.

### **Workplace Exposures Health Priority Group**

The Workplace Exposures Health Priority Group is jointly chaired by DMS Medical Director and DDS PolSec DepHd and reports to the Health and Wellbeing Leadership Team and the Safety FDG. The purpose of the Group is to bring together representatives from the safety, people and medical areas to identify, prioritise and cohere activity with regards to workplace exposure including climatic injuries.

### **DSA Stakeholder Committees**

DSA stakeholder committees provide a forum for stakeholders to identify safety and environmental risks and issues, and raise concerns about regulation, and for Defence regulators to identify areas where regulation is likely to change. Outcomes from DSA stakeholder committees can be raised to the DSA Main Board and in turn into DSEC.

### **Defence organisations' health, safety and environment committees**

Defence organisations maintain their own health and safety committees (sometimes including environmental matters) to provide governance of issues within their area of responsibility. They also provide a forum for maintaining awareness of current and future issues, and support senior leaders in meeting their safety responsibilities. The Director DS is invited to Defence organisation health and safety



committee meetings, in line with letters of delegation from PUS. The DSA Deputy DG acts as an independent adviser to all forums.

### **Defence Industry Safety Forum**

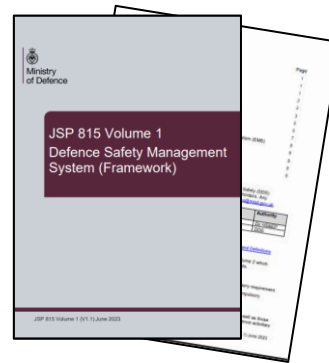
The Defence Industry Safety Forum is a joint MOD and industry forum co-chaired by Director DS and an industry representative. It aims to collaborate to drive continual improvement in shared MOD and industry safety areas, in the wider sectoral safety profession and also within acquisition safety policy.

### **Departmental Joint Health and Safety Committee**

The Departmental Joint Health and Safety Committee (JHSC) is established (under the terms of Regulation 9 of the Safety Representatives and Safety Committees Regulations 1977) to be the forum for health and safety matters relating to the civilian workforce to be discussed at a corporate level between trade unions (TU side), the Defence health and safety management (Management side), the Defence Police Federation and safety representatives from staff organisations recognised by MOD.

The escalation process, which staff can use to raise health and safety concerns with the JHSC, is set out in JSP 815 Volume 2, Element 11: Communications and Stakeholder Engagement.

Safety related issues that do not involve a staff concern and cannot be resolved through routine consultation with the Defence Safety Function should ultimately be escalated via the chain of command to the DSEC.



### **JSP 815**

Defence Safety Management System (SMS)

## 1.4 Functional documents

### Defence Strategy and Defence Plan

DDS leads on and collates the safety aspects of the Defence Strategy and the Defence Plan. The safety activities set out in the Defence Plan should be reflected in command plans, corporate plans and business plans, which all include agreed objectives and key performance indicators.

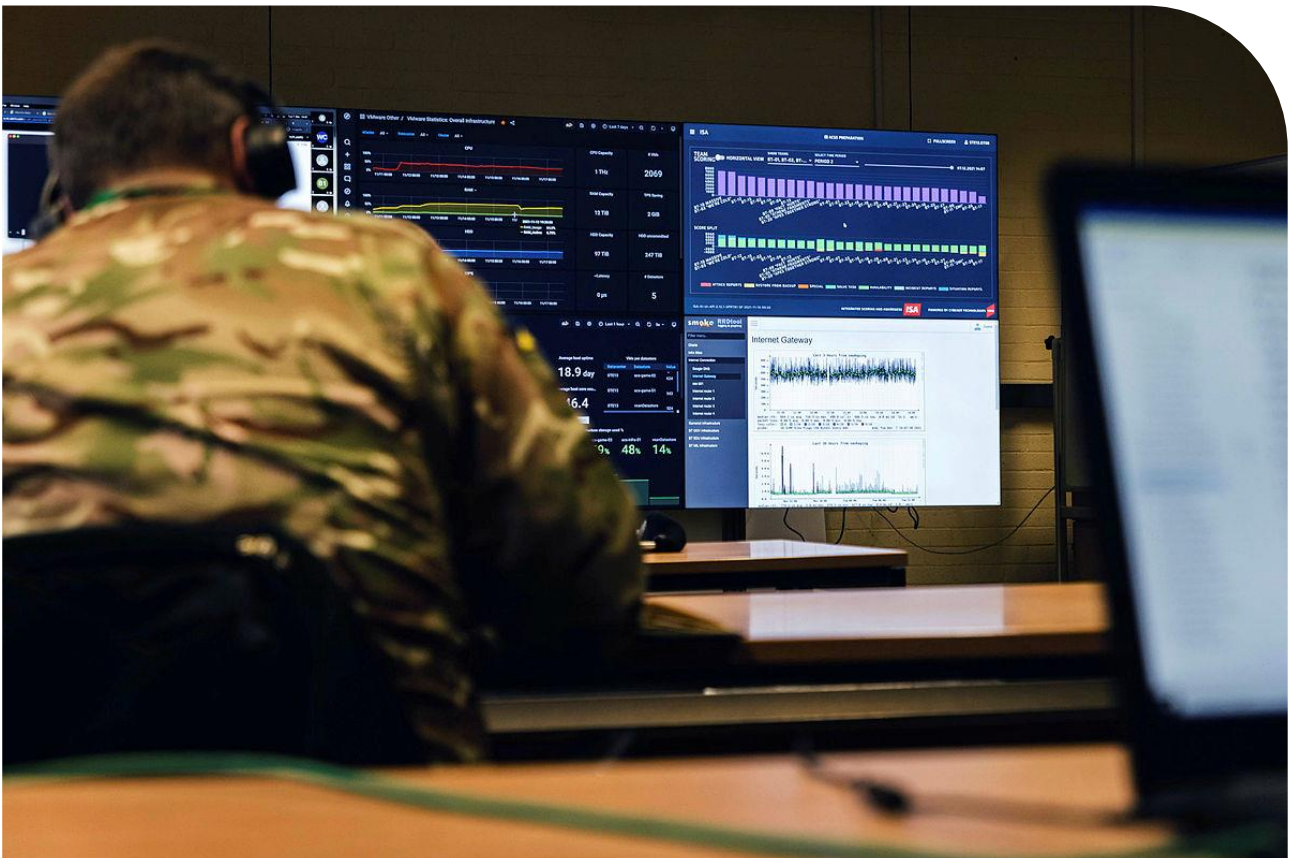
### Defence Safety Functional Strategy


DDS is responsible for developing the Defence Safety Functional Strategy including the vision and forward plan for the function (see section 6) consulting

with Defence organisations, including the DSA. DDS is also responsible for this Operating Model, which sets out how the Defence Safety Function operates and delivers collaboratively.

### Defence Safety Function Digital Direction

DDS is responsible for developing the Defence Safety Function Digital Direction (see section 6) with support from Defence Digital. This document creates a line-of-sight or 'golden thread' between the ends - defined in the Functional Strategy and the pan-Defence strategies (Digital, Data, Cyber, AI, Technology and Information and Knowledge Exploitation) - and the enabling digital ways and means.



A photograph of two firefighters in full gear. The firefighter on the left is wearing a bright yellow helmet with a clear visor and a dark blue t-shirt. The firefighter on the right is wearing a tan t-shirt and is focused on adjusting a black and red rope or strap. The background is slightly blurred, showing a building and a ladder. A dark grey semi-transparent box is overlaid on the center of the image, containing the text '2. Policy, regulation and guidance'.

## 2. Policy, regulation and guidance



# Guiding principles

- Health Safety and Environment Policy Statement**
- SofS's Health Safety and Environment Policy Statement, provides the top-level authority for safety and environmental policies within MOD.
- Defence Safety Management System (Defence SMS)**
- The Defence SMS is the overarching framework document for complying with all safety legislation, Defence regulation and Defence policy.
  - The Defence SMS is owned by Director DS, on behalf of 2PUS.
- Defence policy and guidance**
- Director DS is responsible for developing and maintaining effective safety policies in consultation with Defence Organisations on behalf of 2PUS. Safety policies are published in JSPs or Defence Instructions and Notices (DINs).
- Defence regulation**
- SofS's DSA Charter provides the top-level authority for creating safety and environmental regulations within MOD.
  - DSA is responsible for developing and managing Defence safety regulations within the SMS owned by DDS on behalf of SofS. Defence regulations are set out in the DSA series of documents.

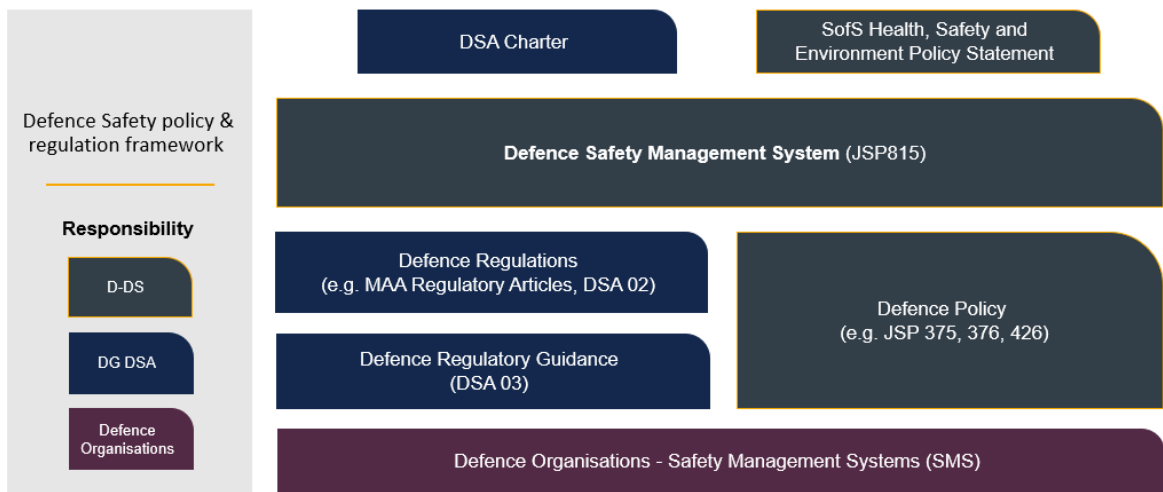


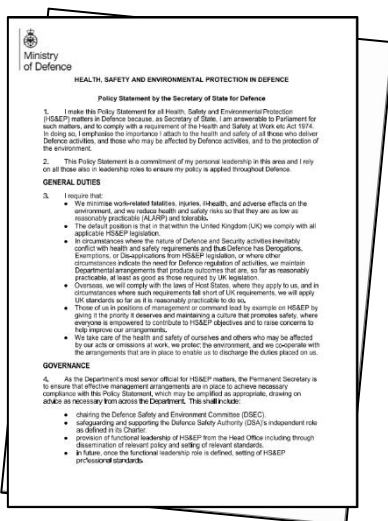
Figure 3 MOD safety policy and regulation framework

## 2.1 Health, Safety and Environment Policy Statement

Figure 3 above sets out the framework for compliance with Defence safety policy and Defence regulation.

The Health, Safety and Environment Policy Statement sets out general safety policy, senior roles and responsibilities, and SofS's personal commitment to managing safety. DDS and CC&E lead in maintaining the Policy Statement in consultation with DSA, which is a legal requirement under the *Health and Safety at Work etc Act 1974*, on behalf of 2PUS.

MOD follows all relevant health and safety legislation that applies in the UK. In some cases MOD has derogations, exemptions and disapplications from legislation that would otherwise apply but nevertheless seeks outcomes as good as statute so far as is reasonably practicable. Overseas, MOD follows legislation that applies at the appropriate location. If laws that apply overseas fall short of UK requirements, MOD will apply UK standards, so far as is reasonably practicable.



## 2.2 Defence Safety Management System (Defence SMS)

The Defence SMS is the overarching framework for complying with all UK health and safety legislation, Defence regulation and Defence policy.

The Defence SMS is set out in JSP 815 and is based on good practice and information taken from the Health and Safety Executive (HSE) publication HSG 65 supported by ISO 45001 (occupational health and safety management systems). The Defence SMS sets the strategic direction for safety and puts in place a set of consistent expectations for Defence organisations to meet when delivering MOD activities. It also describes how MOD demonstrates good practice and continual improvement towards meeting the requirements of SofS's Health, Safety and Environment Policy Statement.

CC&E owns the separate Defence Environmental Management System (EMS – JSP 816) which is set out in JSP 816. The EMS follows the same 12 element structure as the SMS and is supported by ISO 14001 (environmental management systems).

## 2.3 Defence policy and guidance

Director DS is responsible for developing and maintaining effective safety policies and guidance on behalf of 2PUS. Defence policy which must be met, and the guidance that should be followed in order to meet the policy, is predominantly published in JSPs. Following DDS safety policy ensures Defence Organisations comply with legislation and regulations.



Beneath the Defence SMS the safety policy and guidance are set out in the following JSPs:

- **JSP 375 – Management of Health and Safety in Defence**  
Covers the basic arrangements for complying with health and safety law. Each chapter covers a separate hazard or work environment in which safety measures are needed to protect employees.
- **JSP 376 – Defence Acquisition Safety Policy**  
Provides Defence-level, pan-domain policy on the application of safety considerations within acquisition activity. It draws together the requirements of the wider Defence safety policy contained in the Defence SMS and Defence acquisition policy, in particular JSP 655 - Defence Investment Approvals.
- **JSP 426 – Defence Fire Safety and Fire Risk Management**  
Provides policy and guidance on fire safety and fire-risk management. This JSP is owned and managed by the Chief Fire Officer, under the sponsorship of Director DS.

DDS is responsible for the moderation (editorial control) of all safety related Defence Instructions and Notices (DINs). All new DINs relating to safety must be approved by the Safety Functional Delivery Group.

Defence organisations and DSA support DDS development of Defence safety policy. Safety policy may include policy to prevent medical conditions. DDS is not responsible for policy for medical treatment which lies with Defence

Medical Services and is set out in JSP 950 - Medical Policy.

Director DS leads on presenting new or updated policy where appropriate to the DSEC, which acts as a decision-making body for significant or contentious safety policy and regulation issues.

DDS makes sure that all new or updated safety policy is widely consulted on amongst stakeholders, considers the impact on equality and diversity, as set out in the Public Sector Equality Duty guidance, and makes sure that accessibility is considered for publishing on Defnet and GOV.UK. DDS also supports ministers when making safety policy decisions to pay due regard to the five environmental principles in the Environment Act 2021.

DDS is the MOD lead for the consideration of and response to new safety legislation. DDS leads a programme of continuous review of safety JSPs to ensure they reflect best safety practice, respond to investigation and inquiry recommendations and to address any new or amended UK legislation relating to health and safety.

Information on changes to legislation may come through various routes, although new or amended laws that relate to safety are usually reported by the Ministerial Support Unit (MSU). Defence organisations may also become aware of and should inform DDS of relevant new or amended legislation. Multilateral engagement at all levels within and outside of other government departments including with the health and safety statutory regulators allows MOD to forward plan for changes to legislation.

The process of tracking legislation is carried out through tools such as the Defence Legislation Support Tool, which is managed by the DSA. Defence

organisations have access to experts and legal advisers to ensure MOD complies with UK legislation, tracks emerging law or regulation, and determines the effect on MOD.

## 2.4 Defence Safety Authority Charter

The DSA Charter empowers DSA in its role as the independent Defence regulator, assurer and investigator. DG DSA leads in delivering against and maintaining the DSA Charter, on behalf of SofS through 2PUS.

## 2.5 Defence regulations

DSA owns, develops and maintains Defence safety regulations (DSA 02 series) within the SMS owned by DDS on behalf of SofS. DDS and relevant stakeholders are consulted on new or changes to Defence safety regulations.

DSA owns, develops and maintains Defence regulatory guidance documents (DSA 03 series) for some areas. These supplement the Defence regulations by providing Defence codes of practice, including the 'acceptable means of compliance'. DSA manages the process of waivers, exemptions and acceptable alternative means of compliance from Defence regulations, informing Director DS where these are issued.

Defence safety regulations are not intended to replace relevant legislation and are developed and maintained for one or more of the following reasons:

- **A derogation** (a relaxation of a statutory requirement, to allow the law to be applied differently for justifiable practical or operational reasons); **an exemption** (a formal written authorisation normally requiring to be issued by the SofS for Defence for all or a part of

specific legislation or Defence regulation to not apply) or a **disapplication** (where all or part of specific legislation does not apply to MOD) – collectively known as 'DEDs' – applies.

- The DSA regulator has a delegation from the statutory regulator or is directed by authorised local authorities.
- DDS or a Defence organisation has requested, and the DSA has accepted, that an area of MOD activity is not sufficiently regulated.
- There is a gap in UK legislation that needs to be filled when considering MOD activity or following lessons identified.
- For activities that are considered as high risk, Defence organisations (via the DSEC) have decided that the legislation does not provide enough regulation for specific military activities.

## 2.6 Legislative derogations, exemptions and disapplications

Director DS leads on the approvals process for proposed derogations, exemptions and disapplications (DEDs) (i.e. the provision of the DED in draft legislation rather than the exercise of that DED once in law) to UK safety legislation with the support of the DSA, coordinating with other Defence organisations, and securing the agreement of the DSEC where appropriate.

The DSA leads on the management of agreed safety-related DEDs (aside from Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)) (i.e. the exercise of those DEDs already in law) including:

- Recording which legislation provides for Defence derogations, exemptions or disapplications using the Defence Legislation Support Tool.
- Recording approved exemptions certificates.
- Producing Defence regulation where appropriate and to manage an exemption, disapplication or derogation in consultation with DDS and key stakeholders.

Defence Equipment and Support (DE&S) Quality, Safety & Environmental Protection (QSEP) manages the process for exemptions from REACH legislation.

Defence organisations lead on individual applications for the use of an exemption from safety-related legislation, more detail can be found in JSP 815 Volume 2 Annex B.

## 2.7 Defence organisations' SMSs

Defence organisations develop and maintain their own SMSs that are specific

to their organisation, aligned to the Defence SMS (JSP 815). Often this will be a combined Safety and Environmental Management System (SEMS). This sets out how the Defence SMS and underpinning policy and Defence regulations will be delivered.

The default position should be that in keeping with MOD's policy simplification agenda, Defence organisations do not seek to duplicate Defence policy or regulation. Where Defence organisations feel that additional guidance is required, this should be discussed with DDS and/or DSA as appropriate with a sound justification provided. Defence organisations are responsible for making sure that any organisation-specific safety guidance is written in line with the overarching SMS and does not conflict with any Defence policy or regulations.





A photograph of a military command center. Two soldiers in camouflage uniforms, helmets, and face masks are seated at a console. They are surrounded by various pieces of electronic equipment, including monitors and communication devices. The room has large windows in the background, and the overall atmosphere is professional and focused. A dark grey semi-transparent box is overlaid on the center of the image, containing the text '3. Performance, risk and assurance'.

### 3. Performance, risk and assurance

# Guiding principles

## Performance reporting

- The Defence Safety Authority HS&EP Annual Assurance Report (AAR) provides assurance against compliance with safety and environmental legislation, Defence policy and regulation.
- The Safety Functional Annual Assurance Report, produced by DDS, covers the effectiveness of the function across MOD including policy development, governance, risk management and profession.
- DDS reviews Defence organisations' risk reporting and safety performance.

## Risk management

- MOD operates the Three Lines of Defence (LOD) model for safety.
- DDS is responsible for the Safety Assurance Framework (JSP 815) against which safety assurance is conducted across all LODs.
- **Defence organisations** provide the **1LOD** via the Chain of Command as described in their Safety and Environmental Management Systems (SEMS).
- The **Defence Safety Function** provides the **2LOD** and delivers this by:
  - Oversight of management of activity, separate from those responsible for delivery but still within the Defence organisation.
  - DDS conducts 2LOD oversight of safety risk management and derives insight from safety data and information. It receives quarterly performance and risk updates from defence organisations and uses these to inform principal risk reporting to the Defence Board.
- The DSA provides **3LOD** and delivers this by;
  - Assuring compliance with safety UK legislation, Defence policy and regulation.
  - Enforcing Defence safety policy and regulations as needed.
  - Independently investigating Defence safety accidents.
  - Conducting risk based themed assurance.



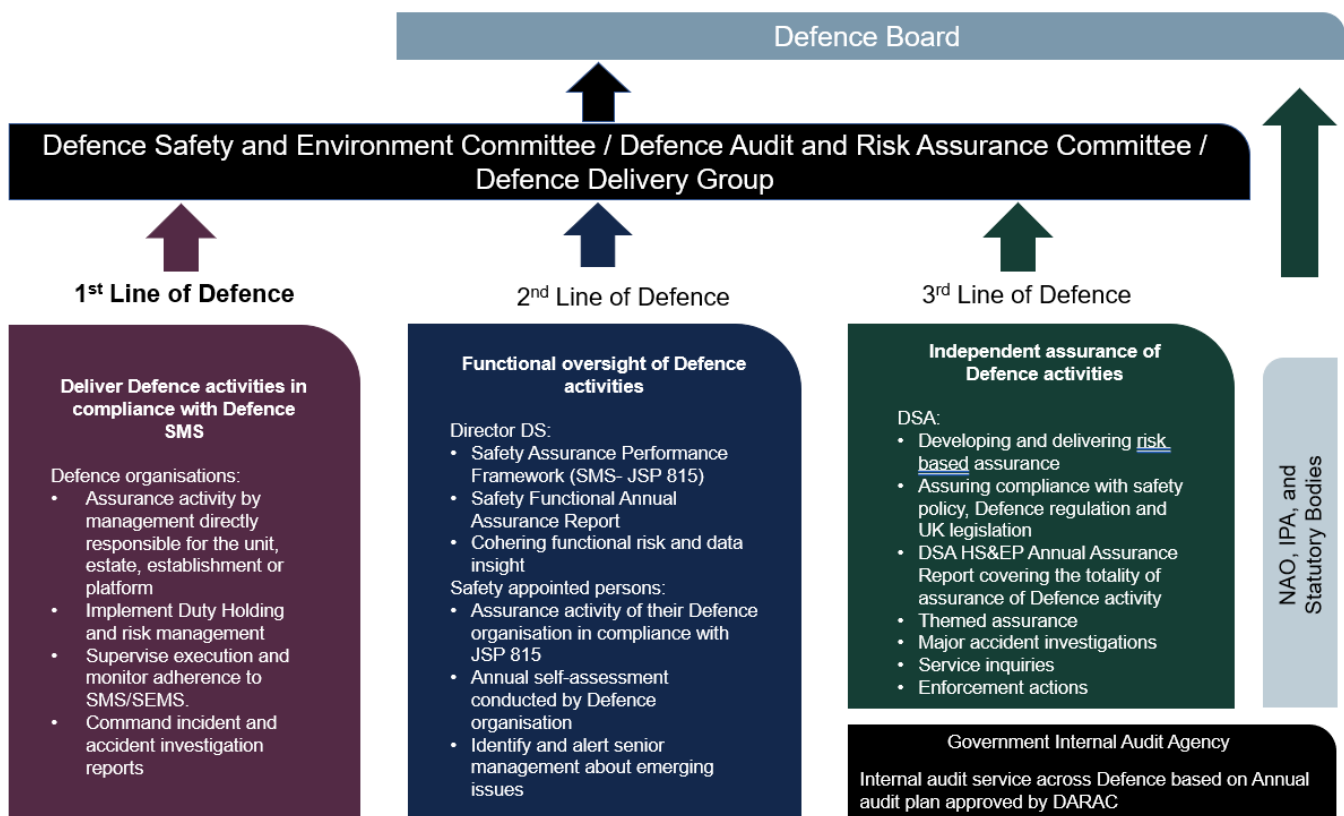


Figure 4 – Safety performance, risk and assurance

### 3.1 Performance reporting

The HS&EP AAR, produced by the DSA, provides 3LOD safety and environmental protection assurance of MOD activity. A core element of the HS&EP AAR is the Safety Functional Annual Assurance Report produced by DDS, allowing the DSA to provide comment on the efficacy of the function. DSA is responsible for submitting the DSA AAR to the Defence Board via the DSEC, and for raising any emerging risks or issues that need to be escalated to the Defence Board.

The Safety Functional Annual Assurance Report, produced by DDS, covers the effectiveness of the function across MOD, including an assessment of policy development and direction; governance, oversight and monitoring; data and reporting; risk management; stakeholder engagement; and the safety and environment profession. DDS is

responsible for submitting the Safety Functional Annual Assurance Report to the DARAC and DSEC, and for raising any emerging safety risks or issues that need to be escalated to the Defence Board.

DDS uses a multifaceted approach to identifying and cohering Safety Risk and Function performance insights by collating data and intelligence through engagement with Defence organisations, to provide a contextualised analysis.

Defence organisations report against standardised safety metrics. Reports against the metrics are provided quarterly to DDS who will collate them and share with the DSEC.

DDS reviews Defence organisations' safety performance and risk reporting, making sure that Defence organisations take appropriate action to address safety performance issues.

### 3.2 Risk management

The Defence SMS (JSP 815) sets out the control framework for safety performance and risk reporting, prioritisation and escalation, including the policy relating to appointed Duty Holders.

Director DS as the safety appointed accountable person for the MOD overall provides advice to the Defence Board on safety risk management within MOD including working with Defence Risk and Assurance (DRA) on Defence principal risks related to safety. DDS provides expertise and guidance to senior MOD leaders as the owners of safety risks.

The DSA supports safety and environmental protection risk-management across MOD, through its assurance, enforcement and investigatory activity. If risk from a Defence activity is not being managed appropriately, the DSA escalates the matter to 2PUS or SofS, informing Director DS.

Defence organisations' most senior leaders act as Senior Duty Holders (SDH) as set out in SofS's Health Safety and Environment Policy Statement and in their letters of delegation from PUS (or any equivalent delegated authority). Duty Holding applies where an organisation's military activities:

- a. present a credible and reasonably foreseeable Risk to Life ; and
- b. the Duty of Care, or other statutory arrangements and/or the control of risks are considered to be inadequate and require enhanced

- safety management arrangements; or
- c. are mandated through regulation.

When risk from a MOD activity cannot be mitigated so that it is as low as reasonably practicable and tolerable, Defence organisations will escalate the matter to 2PUS and SofS, through appointed accountable people/Duty Holders, as appropriate. They will also inform DDS of any safety related issues that have been escalated.

Defence organisations provide key safety risks and mitigation plans to DDS. Director DS, along with the Chief Risk Officer, advises the DSEC on the appropriate Defence safety risk appetite. DSEC will review safety performance, risk and mitigation activity across MOD and will consider the appropriate response.

### 3.3 Lines of Defence

MOD operates the Three Lines of Defence (3LOD) model for safety risk management as set out in the HMT Orange Book (see figure 4 above). Careful co-ordination across the LODs is necessary to avoid unnecessary duplication.

#### 1st Line of Defence (1LOD) – Deliver Defence activities in compliance with the Defence SMS

Defence organisations provide the 1LOD as described in their SMS. Defence organisations have primary ownership of, responsibility for, and accountability for identifying, assessing and managing their safety risks. However, Defence organisations should share lessons learned and best practice in addressing common challenges, including through pan-defence processes. Defence organisations are responsible for their organisation's response to the identified safety risks, through internal controls on a day-to-day basis, and for

implementing corrective actions to address deficiencies or failings.

Defence organisations should have adequate managerial and supervisory controls in place to meet the requirements of UK safety legislation, and Defence safety policy and regulation. Defence organisations ensure that their safety risks are reviewed and agreed by the most senior leader in their organisation.

Defence organisations can tailor their internal assurance arrangements to align with their own risk-based approach and provide confidence in their risk controls. However, they must have adequate processes in place to provide self-assurance at the unit or establishment level and at the organisation or headquarters level.

### **2nd Line of Defence (2LOD) – functional oversight of Defence activities**

DDS is responsible for the Safety Assurance Framework in the Defence SMS (JSP 815) against which all safety assurance is conducted.

The Safety Function provides 2LOD relating to safety and delivers this by:

- i. Safety appointed persons (Safety Directors, CEOs or equivalents) within the Defence organisation are responsible for 2LOD including through undertaking an annual self-assessment of their organisation's performance against the Defence SMS Framework as detailed in JSP 815. Annual self-assessments are submitted to the DSA and presented to the DSEC in DSA's HS&EP AAR.
- ii. DDS conducts 2LOD safety risk management and insight by:

- Analysing quarterly performance and risk updates from Defence organisations and using these to inform principal risk reporting to the Defence Board, DSEC and DARAC with oversight from the Safety, Health and Wellbeing Steering Group.

- Assuring that appropriate safety risk management governance, processes and activities are in place, and cohering functional risks working with DRA and Defence organisations.

- Identifying and alerting DSEC to emerging issues and changing risk scenarios. This may include providing safety input into risk reviews, to inform departmental decision making.

- Conducting specific safety risk management reviews as commissioned by the DSEC.

- As Functional Lead, ensuring coherent Defence-wide safety risk management; using data from across MOD to improve the Safety Function and strategic decision making through the Defence Board risk register.

- Acting as the engagement focal point for safety risk stakeholders through working groups and focus teams.

- Assisting Defence organisations in developing

controls in line with good practice.

DDS does **not** undertake assurance of MOD activities but has the right to conduct safety reviews in specific areas, as directed by the Permanent Secretaries.

### **3rd Line of Defence (3LOD) – independent safety assurance of Defence activities**

DSA provides **3LOD** and delivers this by:

- i. Assuring compliance by Defence organisations with UK legislation, Defence safety policy (including JSPs, such as organisations' SMSs against JSP 815) and regulation taking a risk-based approach to planning its assurance activity.
- ii. Enforcing Defence safety policy and regulations as needed.
- iii. Independently investigating Defence accidents.
- iv. Publishing the DSA HS&EP AAR covering all safety and environmental protection 3LOD assurance of Defence activity against the Defence SMS and EMS Frameworks as detailed in JSP 815 and 816.
- v. Conducting risk-based themed assurance identified through evidence and data analysis, Defence organisation self-assessments and other DSA regulatory and assurance activities.

Government Internal Audit Agency (GIAA) provides an independent audit function across Government. The results of audits will form the basis of GIAA's assessment on the adequacy and effectiveness of safety governance, risk management and internal controls. Where possible their activity should be coherent and deconflicted with that of the DSA.

The National Audit Office's audits, the Infrastructure and Projects Authority's assurance reviews, and inspections or investigations conducted by the statutory regulators such as the HSE, all provide independent information that supports assessment of safety performance and risk-management across MOD. They can provide recommendations direct to Defence organisations and the Defence Safety Function.

### **3.4 Investigations and enforcement action**

The DSA leads on major accident investigations, is the primary convening authority for safety related SIs across all Defence organisations and can also conduct non-statutory inquiries (NSIs). It can make recommendations as well as issuing enforcement action. Where a high-risk activity presents a risk to life, the DSA has the authority to investigate the activity, on a 'dynamic risk basis', while the activity is underway. The DSA maintains a central record of progress against DSA enforcement actions, SIs and NSIs, including closure, and shares this with DDS. The DSA gives Defence organisations expertise and support, if requested, to help them conduct non-statutory investigations.

The DSA's regulators are authorised, through the DSA Charter, to enforce Defence policy and regulations when necessary. The DSA's enforcement model is, where reasonable and possible, in line with statutory equivalents in order

to produce similar outcomes. If there is a dispute between a Defence regulator and anyone in MOD that enforcement action is being taken against, the issue will be escalated through the command, management and DSA hierarchy, up to SofS if necessary.

Statutory regulators, including the Health and Safety Executive, may conduct accident investigations into occurrences involving MOD and issue a Crown Censure against Defence Organisations where they are found to be to blame.

Defence organisations have the right to conduct SIs and NSIs. Defence organisations lead on corrective actions in response to Crown enforcement actions, DSA enforcement actions and inquiries directed at their organisation. They draw on support from DDS, who maintains a central record of progress against Crown enforcement action by statutory regulators. Defence organisations must copy DDS and DSA into all formal correspondence with statutory regulators pertaining to potential or actual crown enforcement action.



A photograph of three people walking in a modern, brightly lit hallway. On the left, a man in a white pilot's uniform with a dark tie and black trousers is smiling. In the center, a woman with long dark hair is smiling. On the right, a woman with long brown hair wearing a tan blazer over a black top and black trousers is smiling. The background features a brick wall and large windows. A dark grey rounded rectangle is overlaid on the center of the image, containing the text.

## 4. People and profession management

## Guiding principles

### Professional leadership

- Director DS is the Head of Profession for Safety and Environment with the support of Director CC&E as Deputy Head of Profession.
- The environmental element of the Safety and Environment Profession is limited to environmental protection.

### Professional standards and competencies

- DDS supported by CC&E provides expertise and guidance to develop the standards and the safety and environment competencies and skills frameworks.

### Learning and development

- DDS supported by CC&E leads the development framework for safety and environment professionals, including career development and professional accreditation.
- DDS leads on the profession's approach to safety training.
- CC&E leads on the profession's approach to environmental protection training.
- DDS collaborates with CC&E on career development and professional accreditation.

### Cultivating talent

- DDS supported by CC&E is responsible for safety and environment protection talent management.

### Strategic workforce planning

- DDS understands and coheres the workforce demand on behalf of the Defence Safety Function; articulating functional capability impact and future requirements with respect to wider Defence strategic workforce planning.

### Building partnerships

- DDS works across MOD and across government to raise the profile of the Defence Safety Function, exert appropriate influence and promote the Safety and Environment Profession supported by CC&E.

## 4.1 Role of the Head of Profession

Building a capable workforce to meet the current and future challenges for MOD is a key priority. Heads of profession are responsible for building the organisation's capabilities, including identifying skill shortages and supporting individuals to develop their professional skills, in order to ensure there is a capable and skilled workforce.

The Head of Profession may be involved in a number of business areas including diversity, workforce planning, talent management, pay, recruitment, retention and apprenticeships.

## 4.2 The Safety and Environment Head of Profession

Director DS is the Safety and Environment Head of Profession and is appointed by a letter of delegation from the COO as the Safety Function owner. The DSEC holds Director DS to account. Director CC&E is the Deputy Head of Profession, supporting Director DS in managing the Safety and Environment Profession. Many roles in MOD have both safety and environmental responsibilities and job holders seek combined safety and environment professional development.

The environmental element of the Safety and Environment Profession is limited to environmental protection. This aligns with the scope of the previous HS&EP Profession and does not include Climate Change and Sustainability professionals.

### Professional leadership

Director DS uses the Safety Functional Delivery Group to provide the first level of governance of, and engagement with, safety and environment professionals in Defence organisations.

As the Safety and Environment Head of Profession, Director DS, supported by Director CC&E, leads on the development of the MOD-wide Safety and Environment Profession 'Offer'. The combined 'Offer' has been designed for employees who are in safety and environmental protection roles or aim to work in such roles. It explains the principles and processes that MOD uses for career development. It also outlines how to identify, assess and develop skills that professionals need in order to have a rewarding safety and environmental protection-related career.

A key part of the 'Offer' is maintaining and communicating professional leadership and standards, functional competencies and accomplishments relevant to the Safety and Environment Profession. The 'Offer' also promotes career pathways available to all staff within the Safety and Environment Profession and the wider workforce, including apprenticeships and entry-level routes into the profession.

Director DS is consulted on appointing key safety leadership roles such as Safety Directors, Chief Environment and Safety Officers (CESOs) and their equivalents to actively support the Safety and Environment Profession as part of their overall workforce management.

### Professional standards and competencies

DDS (in collaboration with the People Function and CC&E) defines safety and environmental standards within the functional competency framework required for the Profession and provides relevant guidance, in line with the KSEB methodology, including digital upskilling with the support of Defence Digital. Defence Organisations should use the safety functional competency framework. Any other frameworks should only be

used following the agreement of Director DS.

The Safety and Environment Profession, provides information to help commanders and line managers plan an effective workforce with the necessary competencies by helping them understand which people with safety and environment responsibilities (as detailed in their SEMS/SMS/EMS) are suitably qualified and competent, and whether they have adequate resources.

## Learning and development

DDS, supported by CC&E:

- Leads the professional development framework for safety and environmental protection professionals including qualifications, career development and professional accreditation.
- Develops, promotes and advertises career pathways available to all staff within the Safety and Environment Profession and the wider workforce, including apprenticeships and entry-level routes into the profession. These are in line with the Safety & Environment Competency Framework.
- Promotes the use of the Safety and Environment Competency Framework to recruit and develop people with the necessary skills, experience, qualifications, competencies and professional accreditations to maintain expertise relating to safety and environmental protection.

DDS and CC&E lead separately on safety and environmental protection training respectively. This involves consideration of MOD wide safety and environmental

protection training including mandatory training.

DDS acts as the Training Requirements Authority for those areas of safety training where DDS safety policy applies and there is no lead Defence organisation.

CC&E acts as the Training Requirements Authority for those areas of environmental protection training where environmental protection policy applies and there is no lead Defence organisation.

DSA acts as the Training Requirements Authority for those areas of safety and environmental protection training where Defence regulation applies and there is no lead Defence organisation.

Defence organisations act as Training Delivery Authorities for those areas of safety and environmental protection training where DDS, CC&E or the DSA is the Training Requirements Authority. Defence organisations act as Training Requirements Authorities and Training Delivery Authorities for safety and environmental protection training specific to their own organisation and establish a lead command for Defence-wide requirements.

Professional accreditation is encouraged within the Safety and Environment Profession and formal qualifications may be required for specific roles. All safety and environmental protection professionals will be encouraged, as part of their ongoing development, to join one of the DDS-recognised professional bodies set out in the Safety and Environment Offer.

## Cultivating talent

DDS, supported by CC&E:

- works with the Head of Profession Forum, People Function, and the MyHR development team to improve the quality of information about the Safety and Environment Profession.

- will also work to improve the approach to safety and environmental protection talent management, by building diverse, high-performing, passionate and committed teams.

### **Strategic workforce planning**

DDS will mature the Safety Function and Safety and Environment Profession in line with the Defence Strategic Workforce Plan (SWP) by identifying the Strategic Workforce Understanding (SWU) baseline and critical roles. This will help identify pinch points in KSEB within the Strategic Workforce landscape.

### **Building partnerships**

DDS, supported by CC&E:

- leads on the process of consulting trade unions on matters relating to the Safety and Environment Profession.

- leads on engaging with other government departments and the development of the Safety and Environment Profession within MOD. CC&E leads on engagement concerning wider climate change and sustainability professional considerations.

DDS leads on engaging with Health and Safety professional bodies, including through corporate membership of those bodies. Director LUCCC&S, leads on engaging with environmental professional bodies, including through corporate membership of those bodies.

DDS and CC&E attend relevant safety and environment forums, including the Head of Profession Forum held twice a year, to share good practice across MOD and government, and to identify and develop opportunities that add value to individuals and to MOD as a whole.





## 5. Stakeholder engagement

# Guiding principles

## Stakeholder engagement

- DDS leads on engaging with internal and external stakeholders on MOD-wide strategic safety issues.

## Consulting trade unions

- DDS leads in consulting with trade unions on MOD-wide safety issues.

## 5.1 Engagement with internal stakeholders

Safety related communications from Head Office and Defence organisations need to be carefully co-ordinated to ensure there is consistent messaging. DDS leads on engaging with internal stakeholders on MOD-wide strategic safety issues.

DDS will formally consult safety stakeholders from Defence organisations and, where relevant, other Defence functions on safety policy and wider safety issues. They will do this through the DSEC and FDG.

DDS engages with Defence organisations directly through Safety Directors and Chief CESOs, or their equivalents, and with other Defence functions on specific issues as they arise. For specific safety issues that need a co-ordinated response from Head Office, DDS will establish specialist working groups from across the Defence organisations and other Defence functions.

The Directorate of Defence Communications (DDC) will support DDS with internal and external communications where appropriate. This may include blogs or other forms of digital communication designed to engage with safety professionals and the general workforce across MOD.

DSA leads on secretariat and communication issues specific to DSA,

for example those related to the DSA HS&EP AAR. The DSA provide DDS and Defence organisations with support (if required) for safety related communication activities, for example providing advice on safety notices.

## Consulting trade unions

MOD, as an employer, recognises the duty to consult employees or their representatives (trade unions and recognised staff associations) on health, safety and welfare matters affecting employees. Trade unions and relevant staff associations are recognised for the purpose of health and safety discussions in line with the Safety Representatives and Safety Committees Regulations 1977 (as amended).

DDS leads in meeting the legal obligation to consult recognised trade unions or staff associations when developing or updating MOD wide health and safety policy. The forum for this engagement is the JHSC. Individual Defence organisations must conduct local Trade Union engagement as set out in the Letters of Delegation from PUS.

The role of health and safety representatives is independent of management. They provide valuable insight, skills and resources that help employees. Health and safety representatives generally inform trade unions and recognised staff associations on matters that will affect the health, safety and welfare of employees, represent the workforce on these matters,

and make representations on potential risks and dangers at the appropriate forum.

### **Interaction with other functions**

Director DS engages with other Defence functions, is a member of the Infrastructure Joint Committee (IJC) and all individual Defence organisation safety boards (or equivalent). Key functional publications and initiatives are submitted to the DOMB to ensure functional coherence.

## **5.2 Engagement with external stakeholders**

Engagement with external stakeholders may relate to a range of safety matters including responses to enforcement action, developing or updating safety policy, and changes to UK and international safety legislation.

DDS leads on engaging with external stakeholders on MOD-wide strategic safety issues.

DDS leads on MOD-wide safety-related secretariat activity but where appropriate may delegate to an area of Defence

better placed to lead on a given subject, such as DSA. Secretariat and communication activities may include cross-Government 'write arounds' on new safety legislation or initiatives, ministerial briefings, Parliamentary Questions and enquiries, dealing with the press, Freedom of Information requests, communication campaigns, and documents for external engagement.

Defence organisations lead on organisation-specific safety communication and secretariat activity. They also provide DDS and the DSA with resources and expertise for MOD-wide safety related communication and stakeholder engagement activities.

In certain circumstances the Directorate of Judicial Engagement Policy (DJEP) and Central Legal Services (CLS) will help DDS in engaging with external bodies and families where there are legal or sensitive implications.

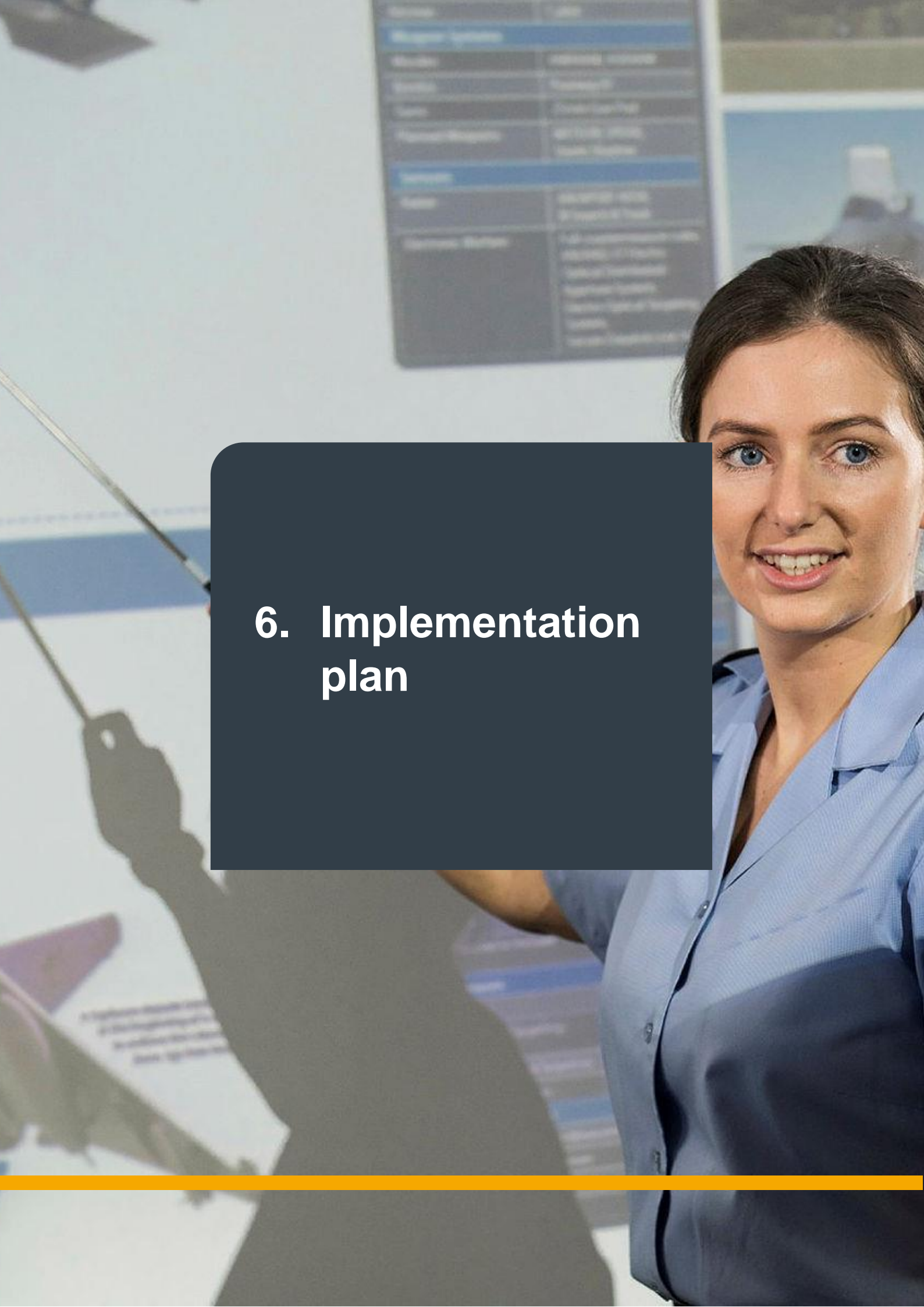
### **Statutory regulators**

The Safety statutory regulators, associated bodies and the relevant MOD leads are shown in table 2 below (N.B. lead areas will be supported by others)

<b>Statutory regulator or associated body</b>	<b>Defence lead</b>
Health and Safety Executive (HSE)	Director DS
Health and Safety Executive – NI (HSENI)	Director DS
Civil Aviation Authority (CAA)	DG DSA
Office for Nuclear Regulation (ONR)	DNO Director Security and Safety
Maritime and Coastguard Agency (MCA)	DG DSA
Driver and Vehicle Standards Agency (DVSA)	DG DSA
Driver and Vehicle Licensing Agency (DVLA)	DG DSA
National Fire Chiefs Council (NFCC)	Chief Fire Officer
National Police Chiefs Council (NPCC)	DG DSA
Hampshire County Council (on behalf of all local authorities and in relation to fuels on Defence property)	DG DSA
Marine Management Organisation (MMO)	DG DSA
Medical regulators (for example, the General Medical Council (GMC), the Care Quality Commission (CQC) and the UK Medicines and Healthcare products Regulatory Agency (MHRA))	DG DSA
Environment Agency	Director CC&E

Table 2: Health and safety statutory regulators, associated bodies and MOD leads.





## 6. Implementation plan



# Guiding principles

## Functional Strategy

- The implementation of Director DS's vision for safety in MOD is set out in the Defence Safety Functional Strategy.
- Defence organisations should maintain moderate safety assurance as assessed by DG DSA.

## Digital Direction

- DDS leads on increasing digitisation of the Safety Function.
- DDS leads on cohering and improving the validity of Safety data and its increased use to support informed decision making aligned with the Data Strategy for Defence.
- As a Function, Safety must align with digital ambition as set out in the Defence Digital Direction and Defence AI strategy.
- DDS Data and Digital projects are linking into central MOD initiatives including Corporate Services Modernisation (CSM) and Digital Exploitation for Defence (DX4D) activities and exploiting the benefits of artificial intelligence to eliminate the inefficiency of people-based data analysis.

## 6.1 Functional Strategy

The implementation of Director DS's vision for safety in MOD is set out in the Defence Safety Functional Strategy. The Functional Strategy includes an implementation plan and safety metrics for Defence organisations to report against to indicate the success of the strategy. High level objectives for Defence organisations are set out in the Defence Command Plan and Defence leaders may introduce further objectives, implementation plans and metrics within their own organisations overseen by their Safety and Environment Committees (or equivalent).

### Assurance

Defence organisations should maintain moderate (as defined by Government

Internal Audit Agency, previously referred to as 'substantial') safety assurance as assessed by DG DSA in the DSA HS&EP AAR.

### Review and continual improvement

This is the second iteration of the Defence Safety Function Operating model, the first was published as the HS&EP Function Operating Model in 2021. DDS is responsible for reviewing the Defence Safety Operating Model at least once every three years or when significant changes are required.

The DSA's Annual Assurance Report ensures, at the Defence-level, a continual cycle of assurance identifying areas for MOD to improve safety performance.

## 6.2 Digital Direction

Digital improvements comprising data, information and knowledge management, lie at the heart of successful Defence Safety Function Operating Model implementation enabling the opportunity for Functional coherence and maturity. This is also the practical aspect of the function most suited to exploiting Artificial Intelligence.

Safety management information and processes vary significantly across MOD organisations and require substantial manual intervention to collate with any confidence for internal and external reporting.

DDS is committed to a digitally enabled and data driven Safety Function. Enhancing digital functionality in the Safety Function will enable greater digital coherence and integration with the ability to gather, process, evaluate and transmit data at speed to empower decision making. By improving the end user experience via process standardisation and simplification; the benefit of improved data quality, transparency of our safety management information and lessons learned data will strengthen our MOD safety culture.

The Safety Function will do this by:

- Creating a Safety Digital Direction (supported by the Defence Digital Function) to align with Defence digitisation goals and to set out the digital ambition for safety;
- Improving safety data completeness; confidence; trend analysis and overall insight through digital coherence;

- Identifying and realising opportunities to improve DDS digital reporting and knowledge sharing;
- Identifying and understanding the current digital landscape and where investigatory groups and interested stakeholders have developed local digital tools and solutions and seek to build a common or collaborative approach;
- Maturing a DDS safety dashboard (supported by Defence Statistics and the Defence Analysis Function); and
- Digitising safety processes to improve the speed, quality of reporting and trend analysis.

### Defence Unified Reporting and Lessons System

The Defence Unified Reporting and Lessons System (DURALS) is a significant safety (and environmental protection) related data and digital project. DURALS will be the single MOD system to report occurrences (accidents, incidents and near misses). Defence Digital lead the development of DURALS, sponsored by DDS as Functional Owner. DURALS is planned to be renamed 'MySafety'.

DURALS is a modern and accessible tool that focuses heavily on improving the user experience and is designed to improve the quality of our MI and lessons learned data. The goal is to transition all Defence organisations onto a single reporting system in the coming years to enable better data driven decision making by improving the efficiency of the incident reporting and investigation process.

