



Ministry
of Defence

JSP 815

Element 2: Organisation and Dependencies



Contents

Title	Page
Amendment record	1
Terms and definitions	1
Introduction	2
Purpose and expectations	2
Safety Management System (SMS)	2
The Organisation	3
Collaborative working	4
Organisational changes	5
Element assurance framework	6
Expectations and performance statements	7

Amendment record

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

Version No	Date published	Text Affected	Authority
1.0	Dec 22	BETA version for consultation	Dir HS&EP
1.1	7 Jun 23	Final version	DDS
1.2	10 Sep 24	Annual revision and combined element and assurance framework	DDS

Terms and definitions

General safety terms and definitions are provided in the [Master Glossary of Safety Terms and Definitions](#) which can also be accessed on [GOV.UK](#).

Must and should

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

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

Introduction

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

Purpose and expectations

2. This element is to assist the Defence organisation to structure, facilitate and encourage flexibility and collaborative working, while managing the associated safety risks and dependencies. This includes:

- a. Intra-organisation working between Defence organisations, with teams that are formed to best meet delivery requirements and mitigate safety risks rather than aligned with organisational boundaries; and
- b. Inter-organisational working, such as with other government departments and the supply chain, which brings in experience and expertise from external parties.

Safety Management System (SMS)

3. A Safety Management System (SMS) is a formal management system or framework for managing safety. Having this in place can assist in achieving a balance between the systems and behavioural aspects of safety management and it treats safety management as an integral part of good management across the organisation.

4. Defence organisations are to develop and maintain an organisational SMS that reflects their activities and supports the Defence vision for safety and to ensure that there is a consistent approach to safety management. It could be a standalone system or it could be combined with an Environmental Management System (EMS) to become the Defence organisations SEMS.

5. The Defence organisation SMS should set out how the Defence SMS Framework and underpinning policy and regulations will be delivered in a way that is specific to each Defence organisation and is the system by which all Defence organisations conduct and manage the safety aspects of their business activities etc., The Defence organisation's SMS should set out:

- a. how the organisation continuously improves its arrangements for managing safety which includes the monitoring of the SMS performance and effectiveness;
- b. how the organisation maintains safe systems of work for all personnel (including business partners and contractors) so that all stakeholders understand their role and their safety responsibilities;
- c. how the organisation identifies and provides the training, information, instruction and supervision to ensure that policies, procedures and other control measures are implemented effectively;
- d. the extent to which authority and responsibility is delegated and how those that hold such positions are assessed as competent in terms of qualification and experience;

- e. the arrangements for identifying, assessing and managing safety risks (this is covered more in Element 4 of this JSP);
- f. the arrangements for consultation with stakeholders including the Trades Unions and staff associations;
- g. identify the safety governance structure, its membership and assurance arrangements;
- h. identify sources of independent specialist safety advice and support from competent Subject Matter Experts (SMEs);
- i. the arrangements for reporting and managing safety events (this is covered more in Element 10 of this JSP); and
- j. the requirement to undertake an Organisational Safety Assessment (OSA) to evaluate and manage the impact of change on safety.

Note: This list is not exhaustive and other details should also be considered.

6. Defence organisations should review their SMS at least annually, or at intervals pertinent to the risk profile of the organisation, or when a significant incident / accident occurs, or following an audit.

7. The SMS of each Defence organisation may differ slightly in certain areas due to the nature of their activities. Where Units or individuals who are part of one Defence organisation are temporarily embedded in or assigned to another Defence organisation then they should follow the direction on the applicability of instructions for SEMS that are set out in Annex A to this JSP.

The Organisation

8. Defence as an organisation is required to comply with the requirements of the Health & Safety at Work etc Act.1974 (HSWA) and associated UK H&S legislation. The Secretary of State (SofS) is answerable to Parliament on the compliance of Defence organisations, as stated in the SofS HS&EP Policy Statement.

9. The SofS for Defence relies on all those in senior leadership roles to make sure that the SofS HS&EP Policy Statement is applied throughout Defence. This responsibility placed upon Defence senior leaders is re-iterated in the letters of delegation issued to the Defence organisations senior leaders, by the Permanent Secretary. The Policy Statement states;

- a. “I require the senior leader of each Defence organisation to set down and implement health, safety and environmental management arrangements through Safety and Environmental Management Systems for activities in their area of responsibility. In doing so they are to ensure that commanders and managers to whom they may delegate safety and environmental authority are competent and have adequate resources at their disposal and are able to manage safety and environmental risks appropriately.”

b. “In circumstances where the nature of Defence and Security activities inevitably conflict with safety requirements and thus Defence has Derogations, Exemptions, or Dis-applications from health, safety and environmental legislation, or where other circumstances indicate the need for Defence regulation of activities, we maintain Departmental arrangements that produce outcomes that are, so far as is reasonably practicable, at least as good as those required by UK legislation.”

10. Defence organisations should commit sufficient resources to identify and provide the minimum personnel levels to manage and address the safety risks it faces. Examples of resources include personnel, infrastructure, equipment, technology and financial. Consideration of resources should include the identification of the short, medium and longer term requirements, such as those required for the operation and maintenance of new infrastructure, equipment and processes to drive continual improvement. Mitigating actions and activities to address risks caused by lack of resources should also be monitored.

11. Senior leaders of Defence organisations are required to lead by example on safety by giving it the priority and profile that it deserves and by making sure that all personnel within their organisation are aware of their safety responsibilities. Defence organisations should ensure that their resource and budget allocation is sufficient to manage their safety risk profile and escalate deficiencies where required. Regular reviews of safety risks and performance should be discussed at the Defence organisation’s senior governance forums to inform decision making and continual improvement.

Collaborative working

12. There is a dependency between all Defence organisations to engage with each other and to make sure that safety risks and issues are shared as widely as possible and across organisational boundaries. Dependencies and interfaces should be managed so that safety good practice is drawn from, implemented and shared with other Defence organisations and the supply chain. Defence organisations should draw on safety good practice from external industries and maintain transparent and effective two-way communication where appropriate and where there is mutual benefit.

13. Defence organisations should establish and maintain effective lines of communication throughout their organisation to report, discuss and address safety issues. The Defence organisations’ Safety Directors and Chief Environment and Safety Officers (CESOs) or their equivalents should engage with Director DS and DG DSA on specific safety issues and in particular those that may have wider Defence implications.

14. Defence organisations should establish effective lines of communication with contractors and suppliers to make sure that relevant safety hazards, issues, policy and practices are received, understood and proactively managed by all those undertaking activities on the Defence estate or where they are undertaking activities on behalf of Defence. Communication and stakeholder engagement are covered more in Element 11 of this JSP.

15. Defence organisations should make sure that industry partners and contractors who undertake activities on behalf of Defence, on Defence equipment, or on the Defence estate comply with the SofS's Policy Statement regarding safety and its amplification in appropriate Defence safety policy or regulations. The Defence organisation should include suitable provision within contracts and in contract operation to monitor safety performance, including but not exclusive to sharing of information, safety performance metrics and undertaking appropriate inspections.

Organisational changes

What is an organisational change?

16. Organisational change encompasses any changes affecting the structure or range of duties currently conducted by personnel within that organisation and may include mergers, organisational restructuring, transfers of Defence personnel or changes to staffing levels and alterations to procedures, roles and responsibilities. Even subtle changes to organisations can have a detrimental effect on the safety of personnel and increase their experience of stress.

17. Change is an inevitable part of business improvement at all levels of an organisation, there can be a number of factors that motivate change for example to adapt to advancements in technology, to meet changing financial requirements or to increase efficiency of processes. While the impacts of simple changes can be readily assessed to demonstrate their effectiveness, those at the organisational level can be more difficult because of the complexity involved or the lack of recognition of the potential impact on safety.

18. Any change to an organisation (infrastructure, processes, structure or people) could introduce risk and unintended or unsuspected consequences. Where proportional to do so, a formal and systematic process should be used to assess and manage such changes from conception through to implementation in order to identify any foreseeable potential safety hazards and manage their risks, this is referred to as an Organisational Safety Assessment (OSA).

19. The SofS Policy Statement states; 'Any senior leader of a Defence organisation proposing organisational change where there is potential for significant impact on safety or environmental standards and performance is to ensure that, before being implemented, the impacts of the proposed change are properly assessed through an Organisational Safety Assessment (OSA) to demonstrate that any detriment to these standards and performance are mitigated to be ALARP and tolerable.' Further information on OSAs can be found in JSP 375 Volume 1, Chapter 35 – Safety and the Management of Change.

20. Where an OSA has been undertaken it should include a clear declaration that there is no reasonably foreseeable detriment to safety as a result of the proposed change. Defence organisations are expected to demonstrate their commitment to safety during all phases of the change process and the Director DS and the DG DSA must be informed if an organisation is no longer deemed safe to operate.

Element assurance framework

21. The focus of this element requires that the Defence organisation's structure facilitates and encourages flexibility and collaborative working, while managing the associated safety risks and dependencies. This includes:

- a. Intra-organisation working between Defence organisations, with teams that are formed to best meet delivery requirements and mitigate safety risks rather than aligned with organisational boundaries;
- b. Inter-organisational working, such as with other government departments and the supply chain, which brings in experience and expertise from external parties; and
- c. Clear understanding on dependencies and appropriate delegations are in place across internal and external boundaries.

22. The expectations and performance statements for this element are set out in the following pages.

Expectations and performance statements

Element 2: Organisation and Dependencies

The Expectations in this element are:

E2.1 Defence organisations develop and maintain an SMS that is specific to their area of responsibility. It sets out how the Defence SMS and underpinning policy and regulations will be delivered in a way specific to the Defence organisation.

E2.2 The Defence organisation defines its safety roles, responsibilities, and accountabilities in its SMS.

E2.3 The Defence organisation has a system in place to allocate appropriate resources (i.e., budget and people).

E2.4 The Defence organisation has arrangements in place to share information about safety risks, supporting effective risk management and continual improvement.

E2.5 The Defence organisation checks that the standards of safety management of its contractors and suppliers meet or exceed Defence standards.

E2.6 The Defence organisation has mechanisms for joint consultation with the workforce, contractors and supply chain.

E2.7 Changes to an organisational structure or changes to personnel with specific knowledge or experience are evaluated, risk assessed, approved and documented.

E2.8 Mechanisms are in place to identify functional and organisational dependencies and interfaces, and how safety risks are managed across these.

Documents often associated with this element:

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

Expectation 2.1 Defence organisations develop and maintain an SMS that is specific to their area of responsibility. It sets out how the Defence SMS Framework and underpinning policy and regulations will be delivered in a way specific to the Defence organisation.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> Defence organisations do not maintain an up to date SMS which is specific to their area of responsibility. 	<ul style="list-style-type: none"> Defence organisations maintain an SMS which is specific to their area of responsibility. However, this is reviewed on an ad-hoc basis only and does not clearly set out how the SMS, underpinning policy and regulations will be delivered. 	<ul style="list-style-type: none"> Defence organisations maintain an SMS which is specific to their area of responsibility. This is reviewed on an annual basis and clearly sets out how the SMS and underpinning policy, regulations will be delivered. This is communicated to all stakeholders across the organisation. 	<ul style="list-style-type: none"> Defence organisations maintain an SMS which is specific to their area of responsibility. This is reviewed on an annual basis and clearly demonstrates how the organisation is kept aware of good practice within underpinning policy and regulations so that continual improvement can be maintained. All stakeholders in the organisation can explain their role or how they might be involved in the SMS.

Expectation 2.2 The Defence organisation defines its safety roles, responsibilities and accountabilities in its SMS.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • A SMS has not been finalised and widely communicated. • Safety roles, responsibilities and accountabilities are not clearly explained or understood. 	<ul style="list-style-type: none"> • Safety roles are broadly documented in the SMS but are not well understood by or communicated to those responsible. They do not accurately reflect the ways that teams work in practice. • Little or no evidence of cross-department safety arrangements with other Defence organisations. 	<ul style="list-style-type: none"> • There is a clear understanding of safety roles across the Defence organisation, and these are clearly documented in the SMS. • Roles and responsibilities are consistent in practice with those set out in policy documents. They are reviewed and updated each year as a minimum. 	<ul style="list-style-type: none"> • Safety roles across the Defence organisation are clearly documented in the SMS, supported by robust evidence that the workforce understand the importance of their responsibilities and accountability for reducing safety risks. • Roles and responsibilities are reviewed and updated regularly following any lessons learned or changes to Defence organisation's resources and activities.

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

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • There is little or no evidence that leadership considers safety risks in the allocation of budgets and resources. • The extent of budget and resource allocated towards addressing safety risks is not defined, impacting the Defence organisation's ability to address safety risks. 	<ul style="list-style-type: none"> • There is some, but not enough evidence that leadership considers safety risks during budget and resource reviews. • The extent of budget and resource allocation to address safety risks is not based on a clear risk-based rationale. 	<ul style="list-style-type: none"> • There is some evidence that leadership formally discusses safety risks during budget and resource reviews. • The extent of budget and resource allocation to address safety risks is based on risk and regularly reviewed to reflect the Defence organisation's activity. 	<ul style="list-style-type: none"> • Leadership demonstrates an understanding that the management of safety risks is an integral part of a productive Defence organisation. • The Defence organisation safety risk profile is directly linked to resource and budget allocation to manage these risks. Regular reviews are discussed at senior governance forums to inform decision making and continual improvement.

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

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • People work in isolation with little understanding or concern about information dependencies and how their activities may influence and affect others. Safety information requirements of other teams are not identified or shared across the Department or with the supply chain. • Safety risk management is not governed by a clear framework for sharing information about risks and continual improvement is not considered. 	<ul style="list-style-type: none"> • Information is generally shared only at working levels, on an ad hoc basis without clearly documented dependencies and defined information requirements. Communication with the supply chain is governed by contractual agreements and is open and honest however the contractor / supplier and Defence organisation are clearly separated. • Safety risk management processes are defined by decentralised teams without a consistent cross-organisation set of frameworks and definitions for sharing information (such as risk impact, likelihood assessments and approaches to mitigation) and continual improvement. 	<ul style="list-style-type: none"> • There is some evidence to show that emerging risks are proactively managed across internal organisational boundaries and with the supply chain. There is an environment of open and honest communication between teams and with the supply chain. • Safety risk management and continual improvement is consistently implemented, using a cross-organisation information sharing, risk management and reporting framework. This enables dependencies between teams and the supply chain to be identified and included. 	<ul style="list-style-type: none"> • There is robust evidence to show that the Defence organisation understands the importance of sharing information with the supply chain to continually improve the control of shared, common, and emerging risks. • There is robust evidence that safety risk management drives the organisation to strive for continual improvement and look for good practice from other organisations and industries in the UK and internationally.

Expectation 2.5 The Defence organisation checks that the standards of safety management of its contractors and suppliers meet or exceed Defence standards.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> There are no formal processes or systems to identify the safety management activities of contractors, and suppliers. There is no monitoring of their performance against the Defence organisation's own policies and practices. Contractor and supplier contracts do not specify safety policies or reporting requirements. 	<ul style="list-style-type: none"> There is some, but not enough limited evidence of a managed system and processes to identify and monitor the safety management activities of contractors, and suppliers. Management does not have consistent data to assess the safety status of contracts, particularly for long-running contracts. There is some, but not enough evidence of safety-related communication with contractors, and suppliers. 	<ul style="list-style-type: none"> There is some evidence of effective arrangements for the selection of contractors, and suppliers, considering safety performance of the contractor or supplier. Effective processes exist for the ongoing safety performance management of contractors at all stages of the relationship. There are performance measures and post-contract reviews in place to help guide decisions on the choice of contractor and other Defence organisations for further work. 	<ul style="list-style-type: none"> There is robust evidence that effective processes exist for safety-related pre-qualification, selection, induction, management and post-contract review of contractors and suppliers. These processes are under regular review and improvement; there is evidence of effective interventions as required.

Expectation 2.6 The Defence organisation has mechanisms for joint consultation with the workforce, contractors and supply chain.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> Leadership is not familiar with the detail of safety working requirements for workforce, contractors and the supply chain. There is little or no evidence of joint consultation with the workforce or supply chain on safety matters. 	<ul style="list-style-type: none"> There is some, but not enough evidence of consultation on safety matters, but with little effect. 	<ul style="list-style-type: none"> Leadership collaborates effectively with workforce, contractors and the supply chain. There is some evidence of effective two-way communication regarding working arrangements and the associated safety risks, both in policy and practice. 	<ul style="list-style-type: none"> Leadership collaborates regularly with workforce, contractors and suppliers and there is evidence of transparent and effective two-way communication. As a result, safety risks related to working arrangements are proactively identified and managed, with cooperation across organisational boundaries and with the supply chain.

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

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> The safety implications of changes to the organisational structure or changes to personnel with specific knowledge are not evaluated, risk assessed, approved and documented. There is little or no evidence of Organisational Safety Assessments (OSA) being carried out. 	<ul style="list-style-type: none"> The safety implications of changes to the organisational structure or changes to personnel with specific knowledge are evaluated and approved but are not risk assessed or documented. There is some, but not enough evidence of OSAs being carried out. 	<ul style="list-style-type: none"> The safety implications of changes to the organisational structure or changes to personnel with specific knowledge are evaluated, risk assessed, approved and documented. There is some, but not enough evidence of the use and effective exploitation of OSAs. 	<ul style="list-style-type: none"> The safety implications of changes to the organisational structure or changes to personnel with specific knowledge are evaluated, risk assessed, approved, documented, and reviewed regularly. OSAs are carried out for all organisational and personnel changes that require them and are used as live documents and tools for management of safety through change.

Expectation 2.8 Mechanisms are in place to identify functional and organisational dependencies and interfaces, and how safety risks are managed across these.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • Coordination within the Defence organisation and across interfaces occurs only on an ad-hoc basis and outcomes are not implemented into the safety framework. • Leadership receive safety advice and requirements from external bodies, such as regulators, but do not proactively identify good practice from third parties or other industries. 	<ul style="list-style-type: none"> • There is coordination of practical safety issues at the working level between individuals and organisations, but there is no overall organisational oversight of dependencies and interfaces, resulting in inconsistent planning and execution. • Some procedures identify interfaces between business units at a working level but this is inconsistent across the Defence organisation. There is limited liaison with other organisations over safety procedures and standards implemented but this does not include all stakeholders. 	<ul style="list-style-type: none"> • There are regular safety-related discussions with other organisations to agree objectives, standards, processes, and arrangements in relation to dependencies and interfaces. • There is effective use of industry knowledge and collaboration leading to clear understanding and control of shared and common safety risks. 	<ul style="list-style-type: none"> • Dependencies and interfaces are managed so that safety good practice is drawn from, implemented, and shared with other organisations. <p>The Defence organisation looks to other industries to identify safety good practice and there is evidence that this has led to continual improvement.</p>