JSP 815

Element 11: Communications and Stakeholder Engagement

Contents

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	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 communication and stakeholder engagement. This element also aims to explain the importance of communications and stakeholder engagement which at the highest level is set out in the [Defence Safety Operating Model.](#)

Purpose and expectations

2.   This element focuses on the mechanisms the Defence organisation has in place to identify its internal and external stakeholders and communicate and engage with these stakeholders on safety matters.

Identification of stakeholders

3.   Defence organisations should identify the stakeholders who are impacted by its activities and understand their needs and expectations. This should inform the design of the Defence organisation's Safety Management System (SMS) and their stakeholder engagement planning.

4.   A stakeholder mapping exercise to consider their influence and impact is an effective way to prioritise stakeholder engagement for Defence organisations and assist them to develop a 'communications and engagement plan'. The plan should be reviewed and updated as appropriate and should consist of:

a.   a set of communication and engagement objectives that are agreed with key stakeholders and approved by senior leaders;

   b.   a stakeholder map, identifying target stakeholders / audiences, their information needs, and the methods / channels for communications and engagement;

   c.   an actively managed forward-plan of tactical activity to deliver against the specific objectives; and

   d.   a method of evaluating the impact / success of the communication and engagement activities (ideally with metrics), the findings should be acted on to improve delivery against objectives and increase audience satisfaction / participation.

5.   Defence organisations should understand and fulfil their legal obligations and regulatory requirements with regards to safety stakeholder engagement and communication which should be clearly identified and understood at every level of the organisation. The law sets out how organisations are to consult their employees on safety matters in different situations and the choices they are required to make. There are two general regulations that set out an employer's duty to consult their workforce with regards to safety issues and they are:

   a.   [The Safety Representatives and Safety Committees Regulations 1977](#)

   b.   [The Health and Safety (Consultation with Employees) Regulations 1996](#)[1]

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[1] The 1996 regulations only apply to workforces that are not covered by TU recognition.

Stakeholder engagement

6. Defence organisations should understand the influence that internal and external stakeholders have on their organisation's activities and as such they should establish, implement and maintain a process for stakeholder engagement and consultation which should include:

a. Providing mechanisms, time, training and the resources necessary for consultation and participation.

b. Providing timely access to clear, understandable and relevant information about their Safety Management System (SMS).

c. Determining and removing obstacles or barriers to participation and minimise those that cannot be removed.

d. Making all stakeholders aware of their roles with respect to communication on safety matters.

e. Emphasise the consultation of personnel at all levels (particularly those carrying out the work activities or impacted by it) on the following:

(1) determining the needs and expectations of interested parties;

(2) understanding relevant safety legislation, policy and regulations;

(3) assigning organisational roles, responsibilities and authorities, as applicable;

(4) determining how to fulfil legal requirements and other requirements;

(5) establishing safety objectives and planning to achieve them;

(6) determining applicable controls for outsourcing, procurement and contractors;

(7) determining what needs to be monitored, measured and evaluated;

(8) planning, establishing, implementing and maintaining an audit programme; and

(9) ensuring continual improvement.

f. Emphasise the participation of the workforce in the following:

(1) determining the mechanisms for their consultation and participation;

(2) identifying hazards and assessing safety risks and opportunities;

(3) determining actions to eliminate hazards and reduce safety risks;

(4) determining competence requirements, training needs, training and evaluating training;

(5) determining what needs to be communicated and how this will be done;

(6) determining control measures and their effective implementation; and

(7) investigating safety occurrences and nonconformities and determining corrective actions.

7.   Defence organisations are to engage with the Director DS and DG DSA on specific safety issues that may prevent the Defence organisation from complying with safety legislation and / or Defence policy or regulations. Defence organisations should also engage with the Director DS and DG DSA where they have identified safety risks and issues that may have a Defence level impact.

Consultation

8.   The Director DS has established the Defence safety Functional Delivery Group (FDG) to consider and address pan-Defence strategic safety issues. Defence organisations are to support the work of these groups and to make sure that suitable representatives are members of these groups, and that attendance is not delegated (unless in exceptional circumstances). Defence organisations can use these forums to raise awareness of safety risks, issues and challenges affecting their own organisation and share good practice and lessons learned to help drive continuous improvement in safety across Defence.

9.   Defence organisations are to establish their own hierarchy of safety boards, committees, forums and meetings for maintaining awareness of current and potential future safety issues by discussing all the key safety topics such as risks, incidents, accidents, near misses and so on. The Director DS should be invited to Defence organisation safety committee meetings, in line with the letters of delegation from the Permanent Secretary.

10.   Defence organisations are consulted on all safety policy reviews and updates through the FDG or specific policy review groups led by the Directorate of Defence Safety (DDS). Defence organisations are to provide appropriate resources (often those with subject matter expertise) to assist with the development of new or to review and update existing safety policy. The Defence organisation's permanent FDG members are responsible for the coordination of responses to safety policy consultation within their organisation and to provide the final approval on behalf of their organisation.

11.   Consultation is a two-way process, so as well as making sure that safety direction and guidance is communicated to all levels of the organisation by senior leaders, Defence organisations should encourage all personnel to raise concerns and to influence decisions on managing safety across the organisation and more widely across Defence.

Consulting with trade unions

12.   Defence organisations should understand and meet their legal obligation to consult with recognised trade unions (TUs) or relevant staff associations on safety issues concerning civilian staff and when developing their organisational level safety policy. Defence organisations should ensure that relevant meetings and forums with the TUs are established at organisation and site level.

13.   The Director DS co-chairs the Defence Joint Health and Safety Committee (JHSC) with the TUs lead representatives, the JHSC is a forum for discussing matters relating to the safety at work and welfare of the civilian workforce at a corporate level between MOD trades unions (TU Side) and the MOD safety management (Management Side). The membership is made up of Head Office safety and Civ HR representatives and nominated representatives from the recognised Industrial and Non-Industrial TUs. It does not cover wider employment issues beyond safety and welfare in the workplace such as staff reporting, performance or pay.

14. The JHSC meets twice a year, however extraordinary meetings could be called at short notice if the JHSC members deemed a situation requiring discussion to be serious and urgent enough. The scope of the JHSC is to provide dialogue, cooperation and support where cross-cutting Defence wide safety issues impact the civilian workforce.

15. Defence organisations are required to establish JHSC's or equivalent forums at the Defence organisation level and to consider whether there are Defence wide safety issues with significant cross-cutting implications that need to be raised to the Defence level JHSC.

Communications

16. The communication process established by Defence organisations should include gathering, updating and disseminating information especially with regards to safety risks. Safety campaigns should include positive reinforcement and innovation to drive continual improvement in safety risk management as well as using alerts and directives for the Defence organisation, wider Defence and also for contractors, and the supply chain where appropriate.

17. Defence organisations are to lead on safety related secretariat and communications that are specific to their organisation, but they are to engage with the Director DS and the DG DSA where responses or communications are for cross-cutting Defence wide issues, this is to make sure that a consistent message is provided. These may include:

   a. Communications - such as the issuing of safety notices, safety campaigns, dealing with the press, announcements for the release of new safety policy documents and keeping the DDS Core Brief updated and utilised.

   b. Secretariat - such as safety related ministerial briefings, responses to parliamentary questions or enquiries and freedom of information requests.

Raising safety concerns

18. Defence organisations should have a process in place to enable safety concerns to be reported and for appropriate actions to be taken, including anonymous reporting. This is in addition to the reporting of safety occurrences set out in JSP 375 Chapter 16 - Safety occurrence reporting and investigation. The process should have clear sequential steps to follow until the issue is resolved or addressed at an appropriate level within the organisations chain of command.

Escalation process

19. If a safety concern has been identified, the following steps should be followed sequentially:

   a. concern is raised, ideally first with the individual's direct line manager or military commander, or if they are not available then the local safety adviser;

   b. the activity in question must cease until the matter is resolved (unless in exceptional circumstance for example combat operations);

c.   once action has been taken, those involved (including the person who has raised the concern) should consider if sufficient assurance and evidence shows that the activity has been made safe or the risk has been satisfactorily responded to. If this is not the case, the concern should be raised up to the next level in the chain of command, the Commanding Officer responsible for the activity or the Head of Establishment for the site;

d.   if necessary, an appeal can be made to the Defence organisation Safety Centre or its Chief Environment and Safety Officer (CESO) (or equivalent); and

e.   unresolved concerns concerning civilian staff can be taken to the Defence organisations safety committees, or if they are at a Defence level, to the JHSC.

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

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

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

a.   telephone – 0800 161 3665 (STD) or +44 1371 85 4881 (Overseas)

b.   e-mail – Confidential-hotline@mod.gov.uk

23.   All concerns should be handled responsibly, professionally and in a positive manner. The MOD will not tolerate the victimisation of anyone raising a concern and robust action will be taken against anyone found to be responsible for such actions. Further information on raising complaints is set out in JSP 763 - The MOD Behaviours and Informal Complaints Resolution Policy.

24.   If you have any safety-related concerns then in the first instance you should direct these to your relevant Defence organisation Safety Centre / Team Group Mailbox.

Element assurance framework

25.   The focus of this element requires that Defence organisations have mechanisms in place to identify their internal and external stakeholders and communicate and engage with these stakeholders on safety matters.

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

Expectations and the performance statements

Element 11: Communications and Stakeholder Engagement

The Expectations in this element are:

E11.1 The Defence organisation has mechanisms in place to identify internal and external stakeholders and understand their role and purpose in safety matters.

E11.2 The Defence organisation has mechanisms in place to manage and engage with stakeholders and to consult on safety matters, including with the workforce, trade unions, suppliers, contractors, and others affected by the organisation's activities.

E11.3 The Defence organisation works with its stakeholders to build effective working relations to drive continual improvement in safety.

E11.4 The Defence organisation has mechanisms in place to allow all people, contractors, and the supply chain to easily access up to date safety information relevant to their roles.

E11.5 The Defence organisation has mechanisms in place to enable people to anonymously raise safety related concerns.

Documents often associated with this element:

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

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

Unsatisfactory	Limited	Moderate	Substantial
• There is little or no evidence to demonstrate that the Defence organisation have mechanisms in place to identify internal and external stakeholders or understand their role and purpose on safety matters.	• The Defence organisation has mechanisms in place to identify some stakeholders, however there is limited understanding and communication and engagement with these stakeholders.	• The Defence organisation has mechanisms in place to identify its internal and external stakeholders and their roles are understood. There is regular communication and engagement.	• All stakeholders understand their respective roles with respect to communication on matters of safety. The Defence organisation understands the influence internal and external stakeholders have on their business.

Expectation 11.2 The Defence organisation has mechanisms in place to manage and engage with stakeholders and to consult on safety matters, including with the workforce, trade unions, suppliers, contractors, and others affected by the organisation's activities.

Unsatisfactory	Limited	Moderate	Substantial
• There is little or no evidence to demonstrate that the Defence organisation have mechanisms in place to manage and engage with stakeholders regarding consultation of safety issues. • There is little or no evidence to demonstrate that safety information is clearly and regularly communicated with other key parties (such as trade unions, suppliers, and contractors). • There is little or no evidence to demonstrate that there is formal mechanism in place within the Defence organisation to consult with the workforce and Trade Unions on safety matters.	• The Defence organisation has mechanisms in place to consults with stakeholders regarding safety issues, but this is typically one-way communication of safety matters rather than a collaborative and proactive partnership. • A formal mechanism is in place within the Defence organisation to consult with the workforce and Trade Unions on safety matters. It meets infrequently or on an ad hoc basis.	• The Defence organisation has mechanisms in place to gather feedback from stakeholders and those affected by the organisation's activities regarding safety, and stakeholders are enabled to proactively share concerns. • A formal mechanism is in place within the Defence organisation to consult with the workforce and Trade Unions on safety matters. It meets regularly.	• The Defence organisation promotes open and transparent communication on matters of safety with its stakeholders. • The Defence organisation actively communicates with individual stakeholders and stakeholder forums and considers feedback to improve risk management.

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

Unsatisfactory	Limited	Moderate	Substantial
• There is little or no evidence to demonstrate that the Defence organisation work with stakeholders to build effective working relations or drive continual improvements in safety. • There is little or no evidence to demonstrate that the Defence organisation have mechanisms to manage feedback, including concerns and grievances.	• The Defence organisation works with stakeholders to build effective working relations and drive continual improvements in safety through documented processes. There is some, but not enough evidence of implementing safety processes across the organisation. • The Defence organisation has mechanisms to manage feedback, including concerns and grievances however there is some, but not enough evidence that they are acted upon.	• There is some but could be improved evidence that the Defence organisation works with stakeholders to build effective working relations and drives continual improvements in safety through documented processes. • There is some but could be improved evidence that the Defence organisation has mechanisms to manage feedback, including concerns and grievances and they are acted upon.	• There is robust evidence that the Defence organisation works with stakeholders to build effective working relations and drives continual improvements in safety through documented processes. • There is robust evidence that the Defence organisation routinely consults with stakeholders, jointly sharing safety challenges and working collaboratively to resolve and implement corrective actions. • There is robust evidence that the Defence organisation seeks feedback from its stakeholders, including concerns and grievances to allow them to resolve matters before they are realised.

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

Unsatisfactory	Limited	Moderate	Substantial
• There is little or no evidence to demonstrate that the Defence organisation has mechanisms in place to allow its people, contractors, and the supply chain to easily access up to date safety information.	• The Defence organisation has a mechanism in place to allow its people, contractors, and the supply chain to easily access safety information. There is some, but not enough evidence the information is up to date or is incorrect. • There is some, but not enough evidence that the Defence organisation act on the workforce, contractors, and supply chain challenges on finding information or feedback relating to how easy it is to access.	• There is some but could be improved evidence that the Defence organisation has a mechanism in place to allow all people, contractors, and the supply chain to easily access safety information and the information is regularly reviewed and updated. • There is some but could be improved evidence that the Defence organisation acts on the workforce, contractors and supply chain feedback or challenges on finding information or feedback relating to how easy it is to access.	• There is robust evidence that the Defence organisation proactively shares safety updates and information to raise people, contractors, and supply chain workers awareness of safety information.

Expectation 11.5 The Defence organisation has mechanisms in place to enable people to anonymously raise safety related concerns.

Unsatisfactory	Limited	Moderate	Substantial
• There is little or no evidence to demonstrate that the Defence organisation have mechanisms in place to enable people to anonymously raise safety related concerns.	• There is some, but not enough evidence that the Defence organisation has mechanisms in place for people to be able to raise anonymous safety concerns, and concerns raised are acknowledged and acted upon.	• There is some but could be improved evidence that the Defence organisation has mechanisms in place for people to be able to raise anonymous safety concerns. • Safety concerns are acted upon with documentary evidence. • There is some but could be improved evidence that anonymous concerns initially unlinked to safety are not considered for safety impact.	• There is robust evidence that the Defence organisation has mechanisms in place for people to be able to raise anonymous concerns, and leadership actively encourage feedback to be shared. • There is robust evidence that the leadership supports the ability for concerns to be raised anonymously and promotes an open and transparent reporting culture. • There is robust evidence that anonymous concerns not initially linked to safety are considered for safety impact.