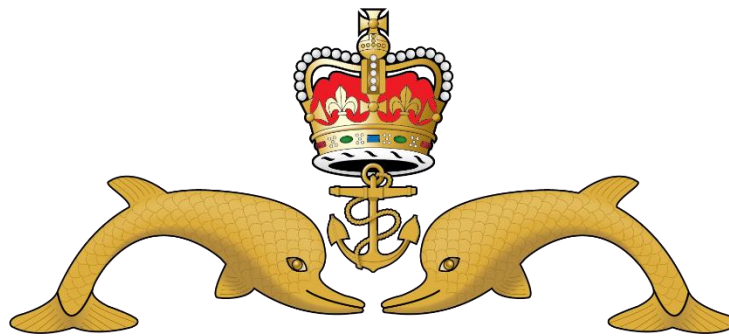


**FINDINGS OF THE IMMEDIATE SHIP'S INVESTIGATION (ISI) INTO ALLEGATIONS OF MISCONDUCT AND INAPPROPRIATE BEHAVIOUR WITHIN THE SUBMARINE SERVICE REPORTED BY ██████████ DIRECTED BY COMMODORE P DUNN OBE COMMODORE SUBMARINE FLOTILLA**



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**Disclaimer:**

Readers should be aware that some of the content contained in this report may be distressing. The report contains the details of allegations of sexual and other misconduct, witness interviews and the conclusions of the investigating team. The report was drafted primarily for internal use rather than publication. Information is presented directly and without judgement to provide clarity for Royal Navy decision-making. Elements of the report have been redacted to comply with the Royal Navy's obligations under the Freedom of Information Act 2000 and the Data Protection Act 2018.

20231221\_ISI\_SUBFLOT-OSP

21 Dec 23

COMSUBFLOT

**FINDINGS OF THE IMMEDIATE SHIP'S INVESTIGATION (ISI) INTO ALLEGATIONS OF MISCONDUCT AND INAPPROPRIATE BEHAVIOUR WITHIN THE SUBMARINE SERVICE REPORTED BY [REDACTED]**

**Issue**

1. On 13 Oct 22 the Directorate of Defence Communications (DDC) received an email from Deputy Chief Reporter Daily Mail containing allegations made by [REDACTED] (a former Lieutenant Royal Navy) of misconduct and inappropriate behaviour within the Submarine Service<sup>1</sup>. This communication was in preparation for an article to appear in the Daily Mail on Sunday on 16 Oct 22.
2. Cdre P Dunn (COMSUBFLOT) directed a "non-statutory" investigation ("the ISI"), to allow formal examination of the allegations made by [REDACTED] to establish the facts and circumstances of unacceptable behaviour as reported in the Daily Mail. The allegations are set out in Annex B to the Terms of Reference (ToR)s<sup>2</sup> which span a period from 2014 to 2020. (Note Annex B to the ToRs is a separate document to Annex B of the ISI).
3. This ISI focuses specifically on the allegations made in the Daily Mail on 16 Oct 22. In accordance with the ToRs, all matters which may have referred to a criminal offence were reported to COMSUBFLOT for referral to the Service Police. All further findings, details, considerations, and recommendations for action are formally passed to COMSUBFLOT for appropriate action.
4. On 24 Oct 22 Capt [REDACTED] RN (Head Human Performance) was appointed by COMSUBFLOT to lead an ISI into allegations of misconduct and inappropriate behaviour within the Submarine Service, as detailed in the letter at Enc 2. Surg Cdr (D) [REDACTED] RN and Lt [REDACTED] RN were appointed to assist the ISI. In Week 4 of the ISI, Lt [REDACTED] was replaced by Lt [REDACTED] RN, a Surface Flotilla Officer. Additionally, Lt Cdr [REDACTED] RN and LWtr [REDACTED] were tasked to provide administrative assistance to the ISI Team. Cdr [REDACTED] RN has acted as the Legal Adviser to the ISI team throughout.
5. On 08 Mar 23 Cdre Fryer was appointed<sup>3</sup> as the ISI lead due to Capt [REDACTED] being unable to continue. The handover from Capt [REDACTED] to Cdre Fryer took place during the week commencing 13 Mar 23.
6. As a consequence, on 20 Mar 23 COMSUBFLOT wrote<sup>4</sup> to [REDACTED] to inform her of the change in the lead of the ISI and the reason and asked if she were content for Cdre Fryer to contact her. No response was received<sup>5</sup>. On 19 May 23 an update letter<sup>6</sup> was sent to [REDACTED] via her solicitor [REDACTED] to which [REDACTED] replied on 22 May accepting the offer of a follow-on meeting with the ISI team.

<sup>1</sup> Email from Deputy Chief Reporter Daily Mail to Directorate of Defence Communications (DDC) dated 13 Oct 22 - Enclosure 1

<sup>2</sup> ToRs to nominate Capt [REDACTED] as lead for ISI dated 24 Oct 22 - Enclosure 2

<sup>3</sup> Updated ToRs to nominate Cdre Fryer as lead for ISI dated 08 Mar 23 - Enclosure 3

<sup>4</sup> COMSUBFLOT personal letter to [REDACTED] to inform and update progress dated 20 Mar 23 - Enclosure 4

<sup>5</sup> [REDACTED] subsequently confirmed (at 28 Jun meeting) that she did not receive this letter

<sup>6</sup> Cdre Fryer personal update letter to [REDACTED] dated 19 May 23 - Enclosure 7

**Conduct of the ISI**

7. The ISI has been conducted in accordance with BR 172 - Guide to the Conduct of Unit Level Inquiries (The Yellow Guide).

8. BR 172 provides guidance as to when a 'Non-Statutory Investigation' (NSI) should be instigated and the way it should be conducted. An 'Immediate Ship's Investigation' is akin to a 'Learning Account' (LA) or a 'Unit Inquiry' (UI) none of which have a statutory basis. The investigation is a fact-finding investigation.

9. There is a misconception that the investigation and reporting of an ISI should be 'immediate' by virtue of its title. That is not the case. The ISI team would be remiss in its duties were it to respond 'immediately' to so many serious complaints. Accordingly, 'Immediate' refers to the way in which the Service has chosen to address the allegations made by [REDACTED] at the earliest opportunity.

10. In accordance with published policy (BR 172) and the ToRs the ISI's purpose is not to attribute blame to single individuals. The approach throughout has been to investigate all sources of evidence that are now available, in order to corroborate the allegations made, to draw conclusions and make recommendations based on the evidence collated and importantly to prevent or reduce the likelihood of a recurrence<sup>7</sup>.

11. On 4 Nov 22, the ISI team met with [REDACTED] who provided a hard copy of a thirteen-page prepared statement<sup>8</sup> providing greater detail in relation to the allegations reported in the press. In addition, [REDACTED] provided a three-page impact statement<sup>9</sup>. In the first instance [REDACTED] gave permission to share this document with the First Sea Lord (1SL), COMSUBFLOT, the ISI Team, and the Team's Legal Adviser<sup>10</sup>.

12. [REDACTED]  
[REDACTED]  
[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

13. [REDACTED]  
[REDACTED]  
[REDACTED]

**Balance of Probability**

<sup>7</sup> BR 172 para 0401, 0402a

<sup>8</sup> [REDACTED] 13-page prepared statement - Enclosure 5

<sup>9</sup> [REDACTED] 3-page impact statement - Enclosure 6

<sup>10</sup> On 12 Dec 22 [REDACTED] gave permission for a soft copy to be created and shared by the ISI team on a need-to-know basis.

14. In deciding whether the allegations made in the Daily Mail<sup>12</sup> are proven, the ISI team have taken into consideration all relevant evidence ( [REDACTED] [REDACTED] ) and given each piece of evidence such weight as the ISI team consider appropriate.

15. The ISI team have examined the evidence closely in relation to each separate head of complaint<sup>13</sup> and concluded that which the ISI team agree occurred or did not occur and those the ISI team simply cannot determine, in relation to [REDACTED] [REDACTED]

16. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

17. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

18. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

19. In relation to the other interviewees (and the now identified respondents of [REDACTED] allegations) the ISI team have taken the same approach.

**Alleged Criminal Allegations**

20. There are several very serious allegations made by [REDACTED] some of which purportedly amount to criminal matters of a sexual nature. It was recognised that these matters had to be referred for investigation by the Defence Serious Crime Unit (DSCU) prior to the ISI team being able to address within the ToRs. Correctly, all matters were referred to COMSUBFLOT for referral to the DSCU.

21. [REDACTED] [REDACTED] [REDACTED]

22. [REDACTED] [REDACTED]

**Interviews**

23. The ISI team have interviewed 43 people. The summaries and transcripts are at Table 1. It is acknowledged that the summaries of the interviews are not a contemporaneous note of the interview and agreed by each of the interviewees. The ISI team have taken in to account the evidence that they heard at the time which may not be fully reflected in the interview summary.

<sup>12</sup> The ISI team accept not all the allegations made in the Daily Mail refer to [REDACTED] experience as a submariner. There were other individuals that reported matters to the Daily Mail to which the ISI cannot speak to.  
<sup>13</sup> The ISI recognises that some of the comments made by [REDACTED] to the Daily Mail are allegations of a criminal matter and some are complaints. The ISI does not accept any as a Statutory Service Complaints IAW the Armed Forces Act 2006.  
<sup>14</sup> Note the ISI team invited [REDACTED] to attend the second interview to assist and support [REDACTED]



32. The over-arching allegation made by ■■■ to the Daily Mail is that 'there is a damaging culture of misogyny, bullying and sexual harassment in the submarine service and that it is not a fit place for women'.

33. This is a very broad allegation and one that has previously been referred to in the 2018 MacVean report<sup>18</sup>, the Submarine Community's culture review<sup>19</sup>, and the follow update<sup>20</sup>, and the SM Command Climate review by the Conduct & Culture Cell in 2022<sup>21</sup>. These reviews cover the same time-period as ■■■ allegations and some of the general discussions and findings of this ISI align closely with these broader reviews. The purpose then of this ISI is to address the allegations made by ■■■ via the Daily Mail.

34. When the ToRs were written the allegations reported in the Daily Mail were distilled in 31 separate allegations/statements (annotated A1 to D31 in table below) that were alleged to have occurred over a prolonged period between 2014 to 2020. Having interviewed ■■■ on 04 Nov, these allegations were further broken down into 71 statements/allegations and are summarised in the table below with specific detail in Annexes A to D. These allegations range from sexual assault to sexual harassment, intimidation, to unfair treatment and lack of duty of care to name but a few.

35. Many of the allegations are multifaceted and complex, others are specific, and some are generic and hearsay and therefore challenging to conclude decisively. An executive summary of ■■■ allegations, their breakdown, ISI finding (on the Balance of Probability) and recommendations is in Table 1 below. The detailed findings and recommendations are at Annex A, B, C and D. A compilation of the recommendations is at Table 2.

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<sup>18</sup> 2018 Macvean report into the ethical culture and health of the five Fighting Arms of the Royal Navy.

<sup>19</sup> SM Community Review 24 May 21.

<sup>20</sup> SM Community Review update 6 Jul 21

<sup>21</sup> Op Brundall: Conduct and Culture Cell Review into the Command Climate and broader culture of the submarine community.



		[REDACTED] [REDACTED]	[REDACTED] [REDACTED]  [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	
A2.1	<b>At least one female submariner has reported a rape against a fellow submariner.</b>	This allegation did not specifically happen to [REDACTED]	Previously reported allegations have been investigated by DSCU and in some cases referred to, and prosecuted by, the SPA.	[REDACTED]	5, 6, 7, 8, 9, 10
A2.2	<b>There have been several reports of sexual misconduct.</b>	These are generic allegations that did not specifically happen to [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] However, during interviews, the ISI team encouraged Service Personnel to report any such incidents.	[REDACTED] [REDACTED] [REDACTED]	As above
A3.1	<b>An Executive Officer inserted his genitals into [REDACTED] pocket,</b>	[REDACTED] confirmed this was [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	11, 12





OFFICIAL-SENSITIVE LIMDIS

		Referred to DSCU as above. [REDACTED]	[REDACTED]	[REDACTED]	
A4.1	[REDACTED] was punched in the kidneys if she took eyes off the mast.	[REDACTED] Referred via COMSUBFLOT to DSCU as above.	[REDACTED]	[REDACTED]	11, 12
A4.2	This is said to be common practice with junior watchkeepers.	No specific named individual	[REDACTED]	[REDACTED]	
A5.1	A married colleague exposed himself on [REDACTED] bed in [REDACTED]	[REDACTED] Referred via COMSUBFLOT to DSCU who investigated.	[REDACTED]	[REDACTED]	1, 2, 3, 4

		[REDACTED]	[REDACTED]	[REDACTED]	
A5.2	The XO told her to be quiet when she shouted about it	[REDACTED]	[REDACTED]	[REDACTED]	1, 2, 3, 4
A6.1	The second in Command regularly posted 50p coins through a 'glory hole' into [REDACTED] cabin 'for a blow job'	The second in Command was the XO, [REDACTED]	[REDACTED]	[REDACTED]	XO, CO Desig course to reiterate the moral and ethical position they hold and how to engage with personnel appropriately.



	<p>medical appointment.</p>	<p>██████████ said loudly that if it was for a smear test then they could all get together and perform a cervical examination on the WR table.</p>	<p>██████████ ██████████  ██████████ ██████████ ██████████  ██████████ ██████████</p>	<p>██████████ ██████████ ██████████ ██████████ ██████████</p>	
A8	<p><b>A Lt openly shouted lewd comments about ██████ and the other women at the Trafalgar Night dinner (2016) and was not reprimanded and ██████</b></p>	<p>█████ alleges that in the Faslane WR upper bar, following the Trafalgar Night dinner in 2016, ██████ ██████████ was drunk and shouted across the bar "Oi ██████ - you fucking love cock" nobody reprimanded him.</p>	<p>██████████ ██████████ ██████████  ██████████ ██████████ ██████████ ██████████ ██████████  ██████████ ██████████ ██████████</p>	<p>██████████ ██████████ ██████████ ██████████ ██████████ ██████████ ██████████  ██████████ ██████████ ██████████</p>	<p>1, 2, 4, 13, 14</p>
A9	<p><b>Senior Officers openly made sexual gestures (humping motions) towards ██████ and other women in their Command</b></p>	<p>█████ alleged that during the return of ██████ ██████ the XO, ██████ ██████████ stood behind her whilst she was working on</p>	<p>██████████ ██████████ ██████████</p>	<p>██████████ ██████████ ██████████ ██████████ ██████████</p>	<p>1, 2, 4, 13, 14</p>









			[REDACTED]		
A13.1		[REDACTED]	[REDACTED]	[REDACTED]	18
A13.2		[REDACTED]	[REDACTED]	[REDACTED]	18

OFFICIAL-SENSITIVE LIMDIS

		[REDACTED]	[REDACTED]	[REDACTED]	
A13.3		[REDACTED]	[REDACTED]	[REDACTED]	14

OFFICIAL-SENSITIVE LIMDIS

		[REDACTED]			
A13.4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	

		[REDACTED]	[REDACTED]		
A13.5	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
A13.6	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]k	Nil

				[REDACTED]	
B14	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Nil

OFFICIAL-SENSITIVE LIMDIS

B15	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	18, 19
B15.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	19, 20
B15.2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	19, 20
B16	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	21

23 [REDACTED]

OFFICIAL-SENSITIVE LIMDIS

			[REDACTED]		
B16.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	22
C17	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	23, 24
C17.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	23

OFFICIAL-SENSITIVE LIMDIS

	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
C18	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	23, 24
C18.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Nil



OFFICIAL-SENSITIVE LIMDIS

			[REDACTED]		
			[REDACTED]		
C19	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	25
			[REDACTED]		
C20	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	21
			[REDACTED]		
C20.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Nil

			[REDACTED]		
C20.2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	6, 7
D21	<b>Personnel attempt to injure themselves to avoid going on patrol</b>	General anecdotal comment	[REDACTED]	[REDACTED]	21, 24

D21.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	25
D21.2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	2, 11, 12, 17
D22	<p><b>Naked Pictures of models would be posted in the control area to signify another day passed on patrol. Referred to as 'Chick of the day'.</b></p>	<p>Images that are not in accordance with published policy were displayed in the Manoeuvring Room and other compartments to count down the days to the end of the Patrol.</p>	[REDACTED]	[REDACTED]	2, 3, 4, 26, 27



D24	<b>Those in command force juniors to tell them 'shagging dits'.</b>	No specific individual was named by [REDACTED] (male or female).	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	1, 2, 3, 4, 27
D24.1	<b>Those in command force juniors to show them 'sports photos' (picture of partner) before allowing them to leave the room.</b>	As above	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	1, 2, 3, 4, 27
D25	<b>Some Captains have a 'Black Ops Hard Drive' which is code for their porn collection.</b>	No individual COs named.	[REDACTED] [REDACTED] [REDACTED] [REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	28

OFFICIAL-SENSITIVE LIMDIS

D25.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	2, 3, 4, 28
D26	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	1, 2, 3, 4
D27	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	1, 2, 4, 26, 28

OFFICIAL-SENSITIVE LIMDIS

D27.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Nil
D27.2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Nil
D28	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	2, 3
D28.1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Nil
D28.2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	2, 3, 4, 28
D29	Victims were discouraged from filing complaints of abuse and would face a BSQ Ban or	[REDACTED]	[REDACTED]	[REDACTED]	1, 2, 3, 4, 14, 29, 30,





<p>D31</p>	<p><b>A 'Crush Depth Rape List' is common across the Service in which women and men are marked in the order they would be raped in a catastrophic event.</b></p>	<p>[REDACTED]</p>	<p>[REDACTED]</p>	<p>[REDACTED]</p>	<p>2, 4, 14, 17, 26, 28, 31</p>
<p>D31.1</p>	<p><b>This happens among all ranks and is the subject of an ongoing investigation.</b></p>	<p>[REDACTED]</p>	<p>[REDACTED]</p>	<p>[REDACTED]</p>	<p>2, 4, 14, 17, 26, 28, 31</p>

## Discussion

36. The above table is an executive summary of the findings in Annexes A, B, C & D and greater detail is to be found in the Annexes as to why and how the ISI came to the conclusion that a specific allegation was or was not accepted. [REDACTED]

37. In general terms, the ISI found that some of the interviewees did at some point witness, or were subject to, some of the incidents alleged in the Daily Mail. However, the ISI also found that many did not witness, or were not subject to such behaviour. It is apparent to the ISI team that when and where such behaviour was witnessed, there was inherently poor leadership and/or lack of reporting at the time for various reasons.

38. A theme from a number of interviewees has been the perceived closed nature of the 'Perisher club'. This perception is formed around the few successful officers that pass Perisher course and go on to Command submarines. Perisher is, for very good reason, a very difficult qualification to obtain. However, many believe it has formed its own 'club culture' with the perception that you are either 'in or out' of the club.

39. Whilst there are recognised positives, such as 'fighting spirit and ethos' etc to such an entity, there are also negatives and this club culture can be as equally divisive and protectionist. The ISI notes that significant work has already been commissioned by Dir P&T and COMSUBFLOT to address this issue.

## Reporting Mechanisms

40. The ISI was also directed to consider the reasons why Service Personnel (SP) might not report inappropriate behaviour, the effect this might have and the sufficiency and effectiveness of the reporting mechanisms, resolution tools and support available to SP in the Submarine Service. From the interviews conducted, the ISI considers that there are seven main reasons for a SP not to report inappropriate behaviour (this is not an exhaustive list). These are further detailed at Annex E. In summary the following reasons have been identified from the interviews:

- a. Fear of being ostracised or receiving a perceived unfair report.
- b. Fear of career fouling.
- c. Fear of lack of confidentiality.
- d. Fear of not being believed.
- e. Lack of faith or trust in the system, the CoC or the RNP.
- f. Inappropriate messaging from within CoC.
- g. Fear of making life difficult for the respondent.

41. The ISI views that the reporting mechanisms and published policy for the Submarine Service were the same as in the Surface Fleet at the time. However, the resolution tools and support available to personnel deployed in the Submarine Service is more challenging due to connectivity. Equally, the ISI recognises that action taken by Navy Command Headquarters over the last several years has significantly improved support to SP who are alongside and, as much as practicable, at sea.

42. Annex E includes:
- a. The seven main reasons considered for not reporting inappropriate behaviour and the effect on individuals and incidents.
  - b. The detail of why the ISI considers that the reporting mechanisms and resolution tools did not appropriately support individuals at the time of the incidents in the Submarine Service.
  - c. The detail of why the ISI considers that the support to personnel was perceived to be insufficient and ineffective at the time of the incidents in the Submarine Service.
  - d. Consideration of how recent policy changes and reporting mechanism improvements are likely to have a positive impact.
  - e. Further recommendations to sustain an effective reporting culture within the Submarine Service.

### **Reporting Mechanisms and Tools.**

43. The ISI considers the key reporting mechanisms to be the Divisional System and the CoC, and considers the reporting tools to be the statutory SC system under the Armed Forces Act 2006, and the recently introduced Zero Tolerance mailbox (to name but a few).

44. In addition to noting the centrality of culture to behaviour change, both the Wigston Report and the Atherton Report<sup>24</sup> also call into question the efficacy of how Defence deals with instances of inappropriate behaviour.<sup>25</sup> In 2022, a year after the publication of the Atherton Report, Sarah Atherton MP stated that “*Whilst more is to be done, I am pleased to say that - a year on - the Ministry of Defence has taken on many of these recommendations and is committed to tackling unacceptable sexual behaviour and improving the experience for women in the Armed Forces,*”<sup>26</sup> citing the new Zero Tolerance to Unacceptable Sexual Behaviour, Sexual Exploitation and Abuse policies, and the MoD Strategy for Tackling Sexual Offending in Defence

45. Flowing from this strategy (and the new policies) are the following changes to the reporting mechanisms and tools available to SP:

- a. Jun 22 As part of Service Complaint (SC) reform, the RN Centralised Admissibility Team was funded to replace the CO as the decision maker on the admissibility of SCs<sup>27</sup>. All SCs are submitted directly to the RN SC Secretariat rather than to the complainant’s CO.
- b. Nov 22 1SL announced the Defence Unacceptable Sexual Behaviours Training package. This initiative had been under formulation prior to the allegations made in the Daily Mail and was mandated for delivery across the RN NLT 19 Nov 22.

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<sup>24</sup> Protecting those who Protect us: Women in the Armed Forces from Recruitment to Civilian Life, House of Commons Defence Committee. Jul 21, page 6: It found that the systems for responding to inappropriate behaviour are inadequate, that “the Service Complaints’ Ombudsman has ‘never judged the military’s internal complaints’ system as “efficient, effective and fair”, and that there are “serious problems with how the Service Justice System handles criminal sexual offences.”

<sup>25</sup> Report on Inappropriate Behaviours, Ministry of Defence. 15 Dec 19, page 13.

<sup>26</sup> [A year on from the 'Atherton' report... | Sarah Atherton MP](#)

<sup>27</sup> JSP 831 Part 1 Chapter 2 paragraphs 1-7 and Part 2 Chapter 3 paragraphs 25-27.

At the same time the Zero Tolerance Mailbox, to enable direct communications for SP to contact NCHQ without going through their Chain of Command (CoC) was introduced.

46. The ISI considers that prior to the introduction of these additions, the reporting mechanisms and tools available to submarines were and remain a challenge due to the nature of a submarine patrol and the physical connectivity issues especially when deployed and submerged and given the context of the perceived reporting barriers (Annex E).

47. When the submarine is alongside, SP have always had the option of reporting inappropriate behaviour into SUBFLOT, especially if the complaint was about their CoC onboard. Due to the barriers detailed in Annex E, SP have been reticent to report inappropriate behaviour, either to the CoC onboard, or into SUBFLOT. The introduction of both the Centralised Admissibility Team and the Zero Tolerance mailbox makes reporting more accessible when alongside.

48. The ISI considers that prior to the introduction of the new reporting tools, whether alongside or deployed (with the exceptions of the reporting barriers (Annex E), when the CoC has dealt with the complaint iaw policy, then the reporting mechanisms and tools were effective and sufficient.

### **Reporting Support.**

49. The impact on those SP interviewed who have alleged, being the victims of reported or unreported inappropriate behaviour, is significant. Some interviewees perceive there was a lack of support towards informal or formal resolution. However, the ISI considers there were (and still remain) sufficient sources of support available when the Submarine is alongside, even when SP felt unable to request support from the Divisional System, the CoC or SUBFLOT.

50. For these lines of support to be effective, it requires SP to be aware of their existence in the first instance, to have trust in the support available and to engage with the Service in seeking to address.

51. Since the launch of the MyNavy App in 2021, which signposts the support available under the Health and Wellbeing page, awareness is heightened. In addition, the Zero Tolerance Training and Mailbox advises SP on the support available to them.<sup>28</sup> One of the aims of the Modern Navy Communications Campaign is to build trust through publicising successful engagement in response to complaints and concerns, including actions taken, and by signposting sources of support. However, on a deployed SM, support remains limited to the CoC.

### **The Efficiency and Effectiveness of Reporting Mechanisms, Tools and Support.**

52. The unique operating environment of a submarine requires every submarine CO to inculcate a positive Command Climate that enables the CoC to be both effective and sufficient in providing the sole reporting mechanism and source of support available to deployed Submariners. The ISI notes that when such a positive Command Climate is in place, the risk of inappropriate behaviour occurring is minimised in any case. ■■■ has been keen to point out that some of her Commanding Officers (and their submarines) have been

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<sup>28</sup> This will be incorporated in the RN Leadership Development Programme (para 16d).

very good in this respect which confirms that the Command sets the tone and the culture of the submarine.

**Recommendations**

53. The ISI makes 31 recommendations in relation to the allegations made in the Daily Mail and six further recommendations of a wider nature for consideration. All the recommendations are contextualised in the Annexes and referred to in the above summary table (Table 1).

**Table 2: ISI Recommendations**

<b>ISI Recommendation</b>	
1	COMSUBFLOT to ensure appropriate application of the new RN Zero Tolerance policy regarding unacceptable sexual behaviour as part of the rebuilding trust within the Submarine Flotilla post introduction Nov 22 and administrative action regarding inappropriate behaviour pre-Nov 22.
2	Every CO to produce a Command Directive <sup>29</sup> that aligns to RN and SUBFLOT Values and that the Command team is mentored, assessed, and reported on by SUBFLOT for delivering it.
3	COMSUBFLOT to monitor and assure local Command Climate to actively mitigate inappropriate decisions by those in positions of responsibility.
4	COMSUBFLOT to ensure all personnel to be informed, reminded, mentored as to their obligation to refer incidents of unacceptable behaviour – even if an individual does not want to take it further.  Direction given to SP in the CoC regarding their duties and what action they must take if a person who has come to them with a matter that they do not want to take further. Eg disciplinary /criminal must refer to CO. Bullying etc put in the D&I log. To be included in CO Desig course etc.
5	COMSUBFLOT is to request Dir P&T examines how the RNP and DSCU can support Faslane better.
6	COMSUBFLOT to ensure that policy (RNTM 01-078-18) is followed on all submissions of VO in that submariners are offered, and are strongly encouraged, to take part in the Exit Interview to ensure the RN has the opportunity to engage with the individual SP and understand their decision to leave the Service.
7	COMSUBFLOT to request Dir P&T review the current exit procedure (RNTM 01-078-18) to ensure data collected on mandated Exit Interviews, is used to better encourage and advertise the Leavers' Intention Survey, and to ensure transfer of potentially vulnerable service leavers into the Defence Transition Service.
8	Dir P&T to ensure all exit interviews are conducted and data captured, in the Human Performance Dashboard, is tracked and acted/reported on as appropriate.

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<sup>29</sup> FC letter- reference

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9	COMSUBFLOT to request Dir P&T provide data to enable analysis of reasons for leaving that can be filtered by gender, length of service, and Fighting Arm.
10	COMSUBFLOT is to request that Dir P&T reviews current care provision to all alleged victims of inappropriate behaviour, particularly specialist support for all alleged victims of rape and sexual assault.
11	Direct that a people-centred approach to leadership is facilitated and role modelled in all submarine training, including in Perisher and Fleet Operational Standards and Training (Submarines) (FOST(SM)), IAW RN Leadership Doctrine <sup>30</sup> .
12	Direct FOST SM to establish formal coaching and mentoring of COs with a view to discussing Command Culture during early days of OST.
13	COMSUBFLOT (as head of fighting arm) is to ensure selection for Perisher is carried out against both tactical skill and ability to lead through a people-centred approach.
14	Dir P&T to consider making it mandatory for all personnel to complete the DLE Active Bystander fundamentals Course. <sup>31</sup>
15	COMSUBFLOT to request resources are made available for SP to choose to wash their own underwear onboard if feasible.
16	Commanding Officers to promote a culture onboard where females need not feel concerned that their laundry may go missing.
17	COMSUBFLOT to ensure all relevant support is communicated, signposted and available to personnel who wish to raise a complaint.
18	Dir SM to continue to prioritise progression of planned work assessing the use of [REDACTED] [REDACTED], [REDACTED] [REDACTED]
19	Pre streaming for Submarine Service, female submariners are advised of any limitations to platforms they can serve on to manage expectations appropriately.
20	Career Managers to better discuss career paths and alternate career paths with females and agree a clear career plan and to also consider making record (available to both parties) post discussion so that there is mutual understanding.
21	COMSUBFLOT to Request Hd Healthcare consider a review of submarine specific medical policies, procedures and processes, to review the policy for communicating medical-in-confidence information alongside and on patrol, in order to agree and reinforce patient and medical information

<sup>30</sup> [Leading in the Royal Navy: A Whole Force Vision](#) dated Mar 22

<sup>31</sup> [Course: Active Bystander Fundamentals \(mod.gov.uk\)](#)

	handling/management for all submarine medical procedures, ensuring those who need to know make informed decisions at all times.
22	COMSUBFLOT to consider a briefing note to female submariners and for the Personnel Support brief articulating the policy regarding the requirement pregnancy testing.
23	COMSUBFLOT and Navy Healthcare to review and agree the policy and guidance for communicating medical-in-confidence information on patrol, to ensure those who need to know make informed decisions at all times – particularly between the CO and the XO.
24	COMSUBFLOT consider requesting a 6-monthly report from Navy Healthcare that indicates any significant trends of mental fitness within SUBFLOT.
25	COMSUBFLOT to continue to support and prioritise submarine Human Performance activity to both reduce sleep deprivation and increase submariners' ability to perform when sleep deprived.
26	COMSUBFLOT is to ensure all Command Teams continue to update their personnel on RN policy of reporting unacceptable behaviours.
27	COMSUBFLOT to consider regular engagement with D&I teams to brief service personnel on current issues and encourage service personnel to attend.
28	COMSUBFLOT to remind Command teams of their responsibilities with respect to social appropriateness.
29	COMSUBFLOT to include the findings in this ISI with a personalised message across the Flotilla highlighting the importance and the context of USB training, and of the intent to deal robustly with anyone whose behaviour is found to be unacceptable.
30	COMSUBFLOT to ensure correct reporting of USB related events via Dir P&T iaw published policy.
31	COMSUBFLOT to ensure that the previous investigation and recommendations (reference crush depth rape list dated 10 Jan 22) are reviewed and reinforced.

**General recommendations**

54. In the course of this ISI the team has heard a large amount of evidence and, although not specific to the allegations of this, the ISI team makes the following six more general recommendations for the consideration of COMSUBFLOT and Dir P&T

32	Dir P&T to enable review of complaints of service provision by DPHC/DCMH by Hd HC to identify issues and barriers including a review of external audit of DCMH Faslane, to assure a patient-centred approach that enables continuous development.
33	Dir P&T to consider uplift in EDA onboard submarines and increase EDA training availability.

34	All to continue to champion and promote and increase awareness of the activity of the Naval Service Woman’s Network (NSN).
35	COMSUBFLOT to allocate time for and take steps to reinforce Mental health pre/during/post deployment <sup>32</sup> .
36	COMSUBFLOT / Navy People Hd Culture to consider / discuss the implementation of an 18-month Command Climate survey on submarines.
37	Dir P&T to consider resourcing specialist support to all alleged victims of sexual assault and rape, for example, Aurora New Dawn <sup>33</sup> .

**Opportunity**

54. The recent change in Command of the Submarine Flotilla presents a valuable opportunity to build trust amongst the submarine community. The ISI has already seen significant progress in that respect.

55. Trust is at the centre of the people capability, and therefore of Operational Capability (OC). Due to the unique operating environment of a deployed submarine, the operational capability of the Submarine Service depends on the development and maintenance of a culture in which all submariners have the opportunity to thrive. The ISI notes that this is being addressed from the top down, with strong and authentic leadership from the current COMSUBFLOT.

**Wider work**

56. The ISI team has consulted wider work with respect to conduct and culture within the Submarine Service that has been instigated prior to these specific allegations being raised in the Daily Mail.

57. For a wider understanding of previous observations, context and initiatives already underway, this ISI should be read in conjunction with the following:

- a. MacVean Report<sup>34</sup>
- b. Wigston Report
- c. Op Brundall report<sup>35</sup>
- d. Submarine Culture review<sup>36</sup>

58. The Wigston Report finds an unacceptable level of inappropriate behaviour across the Armed Forces, which proportionally has a negative impact more on Servicewomen than it does Servicemen. The Report states that all efforts to reduce inappropriate behaviour in the Armed Forces hinges on “the determination of leaders to change the culture”<sup>37</sup>.

59. The ISI considers that a number of the incidents of inappropriate behaviour investigated by this ISI were caused by a culture that has permitted or even normalised the

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<sup>32</sup> [Strategic Command - JSP950 Lft 2-7-1 Mental Health Pre and Post-deployment v1.2 Oct 20 - All Documents \(sharepoint.com\)](#)

<sup>33</sup> Independent Domestic Violence Advisor (IDVA) and Independent Sexual Violence Advisor (ISVA) provision for RN personnel sexual violence, provided on a one-to-one basis, and includes emotional support, and support through the service or criminal justice process, advocacy, liaison with other agencies and referrals to additional sources of support as required.

<sup>34</sup> 2018 MacVean report into the ethical culture and health of the five Fighting Arms of the Royal Navy.

<sup>35</sup> 20221212 Conduct and Culture cell review into the Command Climate and broader culture of the submarine community

<sup>36</sup> SM Community Review 24 May 21.

<sup>37</sup> Report on Inappropriate Behaviours, Ministry of Defence. 15 Dec 19, page 4.



behaviour. The following discussion focuses on the culture of the Submarine Service, which encompasses the considerations and recommendations made in Annexes A-D.

## Culture

60. The ISI considers that significant activity has taken place over the last circa 15 years to physically enable women to serve onboard submarines<sup>38</sup>. The ISI team also recognises that there has been activity to change the culture of the Submarine Service which has taken in to account the recommendations made in the MacVean Report of 2018<sup>39</sup>. This states that *“Consideration should be given to the female lived experience; treating both sexes as ‘equal’ is a blunt instrument and deliberation should be paid to females being treated in accordance to their needs where these differ from their male counterparts”*.

61. Whilst physical changes to the material of a boat are challenging, cultural changes are arguably more complex. The expectation for women (and men) to assimilate rather than integrate into the existing culture where pornography, ‘locker room chat’ and general misogyny (which has previously been reported and evidenced but is not considered to be the norm), is exacerbated when a Command Team does not engender an inclusive climate.

62. The ISI considers that whilst the Submarine Service culture must continue to improve, the climate onboard each submarine is dependent on the leadership of the CO. A number of incidents of alleged inappropriate behaviour discussed during this ISI (and not within the ToRs of this ISI) have taken place when the respondent(s)<sup>40</sup> have either been under the command of COs who have portrayed poor ethics, or poor personal leadership skills.

63. Whilst not part of the ToRs for this ISI the ISI team recognises that some COs lead with an action-centred approach, which has historically been at the core of formal RN leadership training. In addition, the ISI recognises the significant pressures on submarine COs, to deliver the mission, particularly in the case of the Continuous At Sea Deterrent. These pressures are not unique to the Submarine Service (but are more tangible with submarine operations), including dealing with pressure to deliver the mission, the lack of decompression, the lack of communication with family, friends or Flotilla, and the effort to balance a work life with a family life. These pressures impact on a culture that has seen the task, or ‘delivering the mission’ as of primary importance, sometimes at the expense of submariners’ health, wellbeing, performance, deployability and retention.

64. A significant finding in the Divisional and Regimental System Review (DRSR) that was part of the 2019-2020 RN People Transformation Programme, is that a people-centred approach enhances operational capability<sup>41</sup>. It is recognised that an action-centred approach that focuses on delivering the mission, over time, can adversely impact morale, motivation, performance, deployability and the ability to maintain the very high standards required to live by the RN core values. Importantly, the ISI has heard about some excellent COs, who understand that investing their time into developing a positive Command Climate leads to greater mission success.

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<sup>38</sup> Including the introduction of policies and practices to protect fetuses and to establish policies and guidelines to accommodate women submariners.

<sup>39</sup> Macvean, A, 2018; A Review of the Ethical Culture and Health across the Five Arms of the Naval Service

<sup>40</sup> In some cases, the CO is the accused.

<sup>41</sup> Evidenced in the [RN Leadership Doctrine](#), Mar 22. Specific evidence related to SM performance is held by the [REDACTED] MOD.

65. Since the publication of both the MacVean Report (para 12)<sup>42</sup> and the DRSR findings in Sep 20, Navy Command Headquarters (NCHQ) has taken action to improve culture across the RN, including but not limited to the following:

- a. In 2019, work started on developing a culture cell which was established in Jan 21. The OF5-led RN Conduct and Culture Cell was funded to support the development of positive Command Climates across the RN, including mentoring of COs. Activity has primarily focused on the Submarine Service.
- b. May 21 the OF5-led Human Performance (HP) Team was funded to lead activity that will maximise the performance of people across the whole force RN. Activity has focused on a submarine HP Strategy and Action Plan.
- c. Jan 22 the OF4-led Climate Assessment Team was funded to conduct assessments across every RN Unit based on lived experience of inclusivity. Activity has focused on the Submarine Service.
- d. Mar 22 1SL hosted his Leadership Conference, which launched People-Centred Leadership as the approach to be adopted across the RN. The Conference also launched the new people-centred Leadership Doctrine and Pocketbook. Aligned to the new Doctrine, the RN Behaviours Competency Framework and Role Performance Framework were endorsed as the new RN Leadership training requirement and were submitted to the Training Contractor to develop and deliver the RN Leadership Development Programme.
- e. Jul 22 psychometric testing was funded to assess the leadership capability (and the cognitive ability) of all new COs, with coaching available to maximise their performance.
- f. Nov 22 1SL announced the Defence Unacceptable Sexual Behaviours Training package, mandated for delivery across the RN NLT 19 Nov, and launched the Zero Tolerance Mailbox, to enable direct communications for SP to contact NCHQ without going through their Chain of Command (CoC).

#### **1\* Command Climate.**

66. The Command Climate re-set, following the 1\* transition of command, is effective and positive. The revised 1\* intent, priorities and command philosophy have been cascaded to those in command. This is positive, clearly understood and popular – subordinate units understand the focus on people, transparency, positive behaviours and hold to account. Following command visits to all areas of the command there is an appetite for re-starting 1\* engagements including termly updates and responses to questions staffed through SUBFLOT HQ. All OF4 and OF3 commanders were clear on the new COMSUBFLOT's intent to focus on people at the heart of the enterprise and tolerate no unacceptable behaviour. This start point, made clear ahead of the zero tolerance Defence behaviours re-set, is widely understood amongst command teams. OF6 and OF5 command philosophies are visible, coherent and balanced appropriately between supporting individuals and teams, delivering the plethora of tasks and no-fail missions and developing personnel. The focus on appropriate attitudes and behaviours at every level across the community is appropriate and command standards are being visibly reinforced. Personnel in the Devonport area were

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<sup>42</sup> Whilst the Macvean Report was written specifically for the RN, with a chapter that is focussed on the Submarine Service, its findings and recommendations are echoed in both the subsequent Wigston Report and Atherton Report.

keen to see increased footfall from HQ SUBFLOT – a positive point and an opportunity – for greater engagement and also to support any base support prioritisation issues.

### Conclusions

67. The ISI concludes that (between 2014 – 2020), misogyny, bullying and sexual harassment has been previously evidenced within the Submarine Service. The 31 allegations made via the Daily Mail have been broken down into 71 statements/allegations/complaints. Of these, the ISI considers, on the balance of probability, that:

[REDACTED]

68. With the ISI finding that a number of the allegations (to a varying degree) did happen in relation to SB (or have previously happened within the Submarine Service), it is clear to the ISI Team that SB's experience within the Submarine Service was not that which the ISI team would expect and a very sad representation of that we consider to be made up of a largely very professional cadre of personnel.

69. Whilst misogynistic behaviour could be expected in an environment where women haven't previously been present (such as the Submarine Service) what is not accepted by the ISI team, is the lack of planning and guidance that should have been provided by SUBFLOT and put into place prior to female submariners joining the submarine service.

70. Whilst the ISI finds that there has been proven misogyny, bullying or sexual harassment amongst all ranks and rates in the past, the ISI team concludes that this is not pervasive across the entire Submarine Service. It is noticeable that there are Command-led pockets of working environments in which all women and men have the opportunity to thrive, in which being an active bystander and doing the right thing at all times is valued, and where the few incidents of misogyny, bullying and sexual harassment are dealt with swiftly and robustly due to the strong leadership of the CO.

### Follow on Action

71. This report, its Annexes and Enclosures are now passed to COMSUBFLOT for consideration and appropriate follow-on action.

[REDACTED]

[REDACTED]

Lt RN

[REDACTED]

[REDACTED]

Surg Cdr (D)

**Adrian Fryer**

A C Fryer  
Cdre

**Annexes:**

- A. Considerations, Observations and Recommendations on the Allegations of Assault, Harassment and Intimidation. Pages 45-73
- B. Considerations, Observations and Recommendations on the Allegations of Unfair Treatment. Pages 74-79
- C. Considerations, Observations and Recommendations on the Allegations of Lack of Duty of Care. Pages 80-85
- D. Considerations, Observations and Recommendations on the Allegations of Wider Inappropriate Behaviour. Pages 86-103
- E. Sufficiency and Effectiveness of Reporting Mechanisms, Tools, and Support with Recommendations for Change. Pages 104-114
- F. Service History of [REDACTED]. Pages 115-117

**Enclosures:**

- 1. Email from Deputy Chief Reporter Daily Mail containing allegations of misconduct and inappropriate behaviour within the Submarine Service dated 13 Oct 22.
- 2. COMSUBLOT Letter of appointment of ISI and Terms of Reference dated 18 Nov 22.
- 3. Updated ToRs to nominate Cdre Fryer as lead for ISI dated 08 Mar 23
- 4. COMSUBLOT personal letter to [REDACTED] to inform and update progress dated 20 Mar 23.
- 5. [REDACTED] 13-page prepared statement and 3-page impact statement.
- 6. Cdre Fryer personal update letter to [REDACTED] dated 19 May 23.
- 7. [REDACTED] follow-on note to Cdre Fryer dated 30 Jun 23.
- 8. Transcripts and summaries of interviews.



	<p><b>ISI remarks</b></p>	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p><u>Summary</u></p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
	<p><b>Recommendations</b></p>	<p>1. COMSUBFLOT is to ensure appropriate use of the new RN Zero Tolerance policy as part of the rebuilding of trust within the Submarine Flotilla.</p> <p>2. Ensure every CO produces a Command Directive<sup>43</sup> that aligns to RN and SUBFLOT Values and that the Command team is mentored, assessed, and reported on by SUBFLOT for delivering it.</p> <p>3. Monitor and assure local Command decisions to actively mitigate inappropriate decisions by those in positions of responsibility.</p> <p>4. Direction given to SP in the CoC re their duties and what action they must take if a person who has come to them with a matter that they do not want to take it further. E.g disciplinary / criminal must refer to CO. Bullying etc put in the D&amp;I log. To be included in CO Desig course etc.</p>

Serial		
A2.1 & 2.2	Allegation 2	At least [REDACTED] female submariner has reported a rape against a fellow submariner. There have been several reports of sexual misconduct.

<sup>43</sup> FC letter- reference

<p><b>Circumstance</b></p>	<p>[REDACTED]</p>
<p><b>If reported to SUBFLOT</b></p>	<p>All cases that have not previously been reported have been passed to COMSUBFLOT for consideration for further investigation by DSCU as directed in Enc 1.</p>
<p><b>Action and Outcome</b></p>	<p>[REDACTED]</p>
<p><b>Evidence</b></p>	<p>[REDACTED]</p>
<p><b>ISI remarks</b></p>	<p>[REDACTED]</p>
<p><b>Recommendations</b></p>	<p>5. COMSUBFLOT is to request Dir P&amp;T examines how the RNP and DSCU can support Faslane better.</p> <p>6. COMSUBFLOT to assure that policy is followed on all submissions of VO in that submariners are offered, and are strongly encouraged, to take part in the Exit Interview to ensure the RN has the opportunity to engage with the individual SP and understand their decision to the leave the Service.</p>

		<p>7. COMSUBFLOT to request Dir P&amp;T review the current exit procedure (RNTM 01-078-18) to ensure data collected on mandated Exit Interviews, is used to better encourage and advertise the Leavers' Intention Survey, and to ensure transfer of potentially vulnerable service leavers into the Defence Transition Service.</p> <p>8. Dir P&amp;T to ensure all exit interviews are conducted and data captured, in the Human Performance Dashboard, is tracked and acted/reported on as appropriate.</p> <p>9. COMSUBFLOT is to request Dir P&amp;T provides data to enable analysis of reasons for leaving that can be filtered by gender, length of service, and Fighting Arm.</p> <p>10. COMSUBFLOT is to request that Dir P&amp;T reviews current care provision to all alleged victims of inappropriate behaviour, particularly specialist support for all alleged victims of rape and sexual assault.</p>
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OFFICIAL-SENSITIVE LIMDIS

Serial		
A3.1, 3.2 & 3.3	<b>Allegation</b>	An Executive Officer inserted his genitals into [REDACTED] pocket, licked her ear and blew on her neck while on periscope watch.
	<b>Circumstance</b>	[REDACTED]
	<b>If reported to SUBFLOT</b>	[REDACTED]
	<b>Action and Outcome</b>	This allegation was passed to COMSUBFLOT (as directed in Enc 1) who immediately referred to DSCU for further investigation. [REDACTED]
	<b>Evidence</b>	[REDACTED]

		<p>[REDACTED]</p>
	<b>ISI remarks</b>	<p>[REDACTED]</p>
	<b>Recommendations</b>	<p>11. COMSUBFLOT to direct that a people-centred approach to leadership is facilitated and role modelled in all submarine training, including in Perisher and Fleet Operational Standards and Training (Submarines), IAW RN Leadership Doctrine<sup>44</sup>.</p> <p>12. COMSUBFLOT to direct FOST to establish formal coaching and mentoring of COs with a view to discussing Command Culture during early days of OST.</p>

<sup>44</sup> [Leading in the Royal Navy: A Whole Force Vision](#) dated Mar 22

OFFICIAL-SENSITIVE LIMDIS

Serial		
A4.1 & 4.2	<b>Allegation</b>	[REDACTED] was punched in the kidneys if she took eyes of the mast. [REDACTED]
	<b>Circumstance</b>	[REDACTED]
	<b>If reported to SUBFLOT</b>	[REDACTED]
	<b>Action and Outcome</b>	This allegation was passed to COMSUBFLOT (as directed in Enc 1) who immediately referred to DSCU for further investigation. [REDACTED]
	<b>Evidence</b>	[REDACTED]

		<p>[REDACTED]</p>
	<b>ISI remarks</b>	<p>[REDACTED]</p>
	<b>Recommendations</b>	<p>Review recommendations: 11, 12</p>

Serial		
A5.1 & 5.2	<b>Allegation</b>	A married colleague exposed himself on her bed on [REDACTED] The XO told her to be quiet when she shouted about it.
	<b>Circumstance</b>	[REDACTED]
	<b>If reported to SUBFLOT</b>	[REDACTED]
	<b>Action and Outcome</b>	This allegation was passed to COMSUBFLOT (as directed in Enc 1) who immediately referred to DSCU for further investigation. [REDACTED]
	<b>Evidence</b>	[REDACTED]
	<b>ISI remarks</b>	[REDACTED]
	<b>Recommendations</b>	Review recommendations: 1 - 4

Sexual Harassment		
Serial		
A6.1 & 6.2	<b>Allegation</b>	The second in command [REDACTED] regularly posted 50p coins through a 'glory hole' into [REDACTED] cabin 'for a blow job' and left naked pictures of models for her.
	<b>Circumstance</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
	<b>If reported to SUBFLOT</b>	[REDACTED]
	<b>Action and Outcome</b>	This allegation was passed to COMSUBFLOT (as directed in Enc 1) who immediately referred to DSCU for further investigation. [REDACTED] [REDACTED]
	<b>Evidence</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

		<p>[REDACTED]</p>
	ISI remarks	<p>[REDACTED]</p>

		<p>[REDACTED]</p>
	<b>Recommendations</b>	<b>Review recommendations:</b> 1 - 4






	<b>ISI remarks</b>	[REDACTED]
	<b>Recommendations</b>	<b>Review recommendations:</b> 1, 2, 3, 4

Serial		
A8	<b>Allegation</b>	A Lieutenant openly shouted lewd comments about [REDACTED] and the other women at the Trafalgar Night dinner (2016) and was not reprimanded [REDACTED]
	<b>Circumstance</b>	[REDACTED] [REDACTED] [REDACTED]
	<b>If reported to SUBFLOT</b>	[REDACTED] [REDACTED]
	<b>Action and Outcome</b>	[REDACTED]
	<b>Evidence</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
	<b>ISI remarks</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]





		
	<b>Recommendations</b>	<b>Review recommendations:</b> 1, 2, 4, 13, 14



		[REDACTED]
	<b>ISI remarks</b>	[REDACTED]
	<b>Recommendations</b>	<b>Review recommendations:</b> 2, 4, 11, 12, 13, 14



OFFICIAL-SENSITIVE LIMDIS

Serial		
A11 & 11.1	<b>Allegation</b>	[REDACTED] had her bras stolen from the laundry while engineers would openly sniff the women's used underwear.
	<b>Circumstance</b>	[REDACTED]
	<b>If reported to SUBFLOT</b>	[REDACTED].
	<b>Action and Outcome</b>	[REDACTED]
	<b>Evidence</b>	[REDACTED]
	<b>ISI remarks</b>	[REDACTED]

	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
<b>Recommendations</b>	<p>15. COMSUBFLOT is to consider the feasibility of providing space and resources are made available for SP to choose to wash their own underwear onboard.</p> <p>Review recommendations:</p> <p>1, 2</p>

Serial		
A12	<b>Allegation</b>	A respected captain has a 'black book of revenge' used to list junior personnel who he holds a grudge against.
	<b>Circumstance</b>	[REDACTED]
	<b>If reported to SUBFLOT</b>	[REDACTED]
	<b>Action and Outcome</b>	[REDACTED]
	<b>Evidence</b>	[REDACTED]
	<b>ISI remarks</b>	[REDACTED]

	<b>Recommendations</b>	<b>16. Commanding Officers to promote a culture onboard where females need not feel concerned that their laundry may go missing.</b>

Serial		
A13.1, 13.2, 13.3, 13.4, 13.5	<b>Allegation</b>	[REDACTED]
	<b>Circumstance</b>	[REDACTED]



		[REDACTED]
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		<p>[REDACTED]</p>
	ISI remarks	<p>[REDACTED]</p>
	Recommendations	



		[REDACTED]
		[REDACTED]
		[REDACTED]
		[REDACTED]
		[REDACTED]
		[REDACTED]

Annex B to  
ISI\_SUBFLOT  
21 Dec 23

Considerations, Observations and Recommendations on the Allegations of Unfair Treatment.

Serial		
B14	Allegation	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]
		[REDACTED]

		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
	<b>Recommendations</b>	<p>[REDACTED]</p>

OFFICIAL-SENSITIVE LIMDIS

Serial		
B15 & B15.1	Allegation	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]



OFFICIAL-SENSITIVE LIMDIS

Serial		
B16 & B16.1	<b>Allegation</b>	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]



Annex C to  
ISI\_SUBFLOT  
21 Dec 23

Considerations, Observations and Recommendations on the Allegations of Lack of Duty of Care.

Serial		
C17 & 17.1	Allegation	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]



		<p>[REDACTED]</p>
	<b>Recommendations</b>	<p>[REDACTED]</p>

OFFICIAL-SENSITIVE LIMDIS

Serial		
C18 & C18.1	<b>Allegation</b>	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]
	<b>Recommendations</b>	[REDACTED]

Serial		
<b>C19</b>	<b>Allegation</b>	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]
	<b>Recommendations</b>	[REDACTED]

OFFICIAL-SENSITIVE LIMDIS

Serial		
C20, C20.1 & C20.2	Allegation	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]



Annex D to  
ISI\_SUBFLOT  
21 Dec 23

Evidence surrounding the Allegations of Wider Inappropriate Behaviour.

Serial		
D21, 21.1 & 21.2	Allegation	Personnel attempt to injure themselves to avoid going on patrol. [REDACTED]
	Circumstance	[REDACTED].
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
	ISI remarks	[REDACTED] [REDACTED] [REDACTED]  [REDACTED] [REDACTED]  [REDACTED] [REDACTED]  [REDACTED] [REDACTED]  [REDACTED] [REDACTED] [REDACTED] [REDACTED]

		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
	<b>Recommendations</b>	<b>To review recommendations:</b> 2, 11, 12, 17, 21, 24, 25

OFFICIAL-SENSITIVE LIMDIS


Serial		
D22	<b>Allegation</b>	Naked pictures of models would be posted in the control area to signify another day passed on patrol. This practice is known as 'Chick of the Day'.
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]



		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
	<b>Recommendations</b>	<p><b>36. COMSUBFLOT is to ensure all Command Teams continue to update their personnel on RN policy of reporting unacceptable behaviours.</b></p> <p><b>Review Recommendations:</b> <b>2, 3, 4, 26, 27</b></p>

OFFICIAL-SENSITIVE LIMDIS

Serial		
D23	<b>Allegation</b>	Locker room chat about female colleagues and 'sniffing' is rife; men literally follow the few women around. They are seen as 'legitimate targets' and lewd remarks are made about their bodies in front of senior officers.
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]

		
	<b>Recommendations</b>	<b>Review recommendations:</b> <b>1, 2, 3, 4, 27</b>

OFFICIAL-SENSITIVE LIMDIS

Serial		
D24	<b>Allegation</b>	Those in command force juniors to tell them 'Shagging dits' (story of best sexual exploit) or show them 'Sport Photos' (picture of partner) before allowing them to leave the room.
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]
	<b>Recommendations</b>	<b>Review recommendation:</b> 1, 2, 3, 4, 27



OFFICIAL-SENSITIVE LIMDIS

Serial		
D26	<b>Allegation</b>	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]
	<b>Recommendations</b>	[REDACTED]

OFFICIAL-SENSITIVE LIMDIS

Serial		
D27, 27.1, 27.2	<b>Allegation</b>	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]
	<b>Recommendations</b>	[REDACTED]

OFFICIAL-SENSITIVE LIMDIS

Serial		
D28	Allegation	[REDACTED]
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]



	<b>Recommendations</b>	<b>[REDACTED]</b> <b>[REDACTED]</b>

OFFICIAL-SENSITIVE LIMDIS

Serial		
D29	<b>Allegation</b>	<b>Victims were discouraged from filing complaints of abuse - would face a BSQ ban/branded 'dangerous girls/troublemakers.</b>
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]

		<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
	<p><b>Recommendations</b></p>	<p><b>30. COMSUBFLOT to ensure correct reporting of USB related events via Dir P&amp;T iaw published policy.</b></p> <p><b>And to review recommendations:</b></p> <p><b>1, 2, 3, 4, 29</b></p>

OFFICIAL-SENSITIVE LIMDIS

Serial		
<b>D30 &amp; 30.1</b>	<b>Allegation</b>	There is a damaging culture of misogyny, bullying and sexual harassment amongst all ranks. It is not a fit place for women.
	Circumstance	[REDACTED]
	If reported to SUBFLOT	[REDACTED]
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]



OFFICIAL-SENSITIVE LIMDIS

Serial		
D31	Allegation	A 'crush depth rape list' is common across the service in which women and men are ranked in the order they would be raped in a catastrophic event. This is said to happen among all ranks and is said to be the subject of an ongoing investigation.
	Circumstance	[REDACTED]
	If reported to SUBFLOT	Yes
	Action and Outcome	[REDACTED]
	Evidence	[REDACTED]
	ISI remarks	[REDACTED]

		<b>[REDACTED]</b> <b>[REDACTED]</b>
	<b>Recommendations</b>	<b>31. COMSUBFLOT to ensure that the previous investigation and recommendations (dated 10 Jan 22) are reviewed.</b>  <b>And to review recommendations:</b>  <b>2, 4, 14, 17, 26, 28</b>

**Annex E to  
ISI\_SUBFLOT  
21 Dec 23**

**ANALYSIS OF SUFFICIENCY AND EFFECTIVENESS OF REPORTING MECHANISMS,  
TOOLS AND SUPPORT WITH RECOMMENDATIONS FOR CHANGE.  
INTRODUCTION.**

1. This Annex addresses Tasks 4b and 4c as defined in the ISI Letter of Appointment<sup>46</sup> (Enc 2 and updated at Enc 3). These are:
  - a. Whether there are, or have been, reporting barriers to inappropriate behaviour and, if so, how these have occurred and the effect they have had, and could have, on the subjects and incidents of these behaviours. You are to make recommendations for how an effective reporting culture could be sustained.
  - b. Whether the reporting mechanisms, resolution tools, and support available to personnel in the Submarine Service are sufficient and effective and, if potential shortcomings are identified, make recommendations for improvement.
2. These are further broken down and adressed in 5 sections as below:

**Section 1:** Barriers to reporting inappropriate behaviour.

**Section 2:** Sufficiency and Effectiveness of Reporting Mechanisms and recommends.

**Section 3:** Sufficiency and Effectiveness of Resolution Tools and recommends.

**Section 4:** Sufficiency and Effectiveness of Support Tools and recommends.

**Section 5:** Recommendations for how an effective reporting culture could be sustained.
3. Understandably, this Annex has many themes in common with the main ISI report note and all the recommendations below are cross-referenced in the ISI findings table and the recommendations table of the main report.

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<sup>46</sup> Updated ToRs for ISI dated 08 Mar 23 - Enclosure 3 to main ISI report.



**SECTION 1 - BARRIERS TO REPORTING INAPPROPRIATE BEHAVIOUR.**

1. Analysis of all interviews in the ISI finds that the main barriers to reporting inappropriate behaviour, order of impact, are considered to be:

a. **Fear of ostracised by reporting.** [REDACTED]

b. **Fear of career fouling.** Interviewees had spoken about the close knit/closed shop approach and the real perception that those who report inappropriate behaviour are seen to be less able, or weak for not being able to handle it. [REDACTED]

c. **Fear of lack of confidentiality.** Interviewees provided evidence of how little respect is given to confidential reporting, whether the complaint is made to the CoC or to the RNP. [REDACTED]

d. **Fear of not being believed.** There is evidence of both women and men feeling that they are being doubted by both the CoC and by the RNP when they have reported assault. [REDACTED]

<sup>47</sup> Interview with [REDACTED]  
<sup>48</sup> Interview with [REDACTED]  
<sup>49</sup> Interview with [REDACTED]  
<sup>50</sup> Interview with [REDACTED]  
<sup>51</sup> Interview with [REDACTED]  
<sup>52</sup> Interview with [REDACTED]  
<sup>53</sup> Interview with [REDACTED]  
<sup>54</sup> Interview with [REDACTED]  
<sup>55</sup> Interview with [REDACTED]

overreacting, should have done more to address the behaviour at the time, or that she was to blame.

e. **Lack of/no faith or trust in the system, the CoC or the RNP.** Linked to above para, one Officer states [REDACTED]

[REDACTED]

f. **Previous inconsistent messaging from the top of SUBFLOT.** Linked to paras a & b above, messaging from previous COMSUBFLOT has had a particular impact on Officers. [REDACTED]

[REDACTED]

g. **Fear of making life difficult for the Perpetrator.** [REDACTED]

[REDACTED]

2. A significant concern for the ISI team is that a number of the interviewees stated that there has been a significant impact on their health, [REDACTED]

[REDACTED]

<sup>56</sup> Interview with [REDACTED]

<sup>57</sup> Interview with [REDACTED]

<sup>58</sup> Interview with [REDACTED]

<sup>59</sup> Interview with [REDACTED]

<sup>60</sup> [REDACTED]

**SECTION 2 - SUFFICIENCY AND EFFECTIVENESS OF REPORTING MECHANISMS.**

1. The ISI considers that whilst Reporting Mechanisms are mostly sufficient and effective in theory, they are less effective in practice, particularly for submariners. Current reporting mechanisms are detailed in:

- a. JSP 763: the MOD Behaviours and Informal Complaints Resolution Policy,
- b. JSP 831: the MOD Formal Complaints Policy
- c. BR3 Ch20: the RN Discipline Policy and Processes
- d. BR3 Ch23: the RN Service Complaints and Representations Policy.
- e. BR172:
- f. The Service Complaints' Ombudsman for the Armed Forces.
- g. JSP 887: The public sector equality duty in Defence.

2. The references and policies clearly state the requirement for professionalism, confidentiality, timeliness, and support for both complainant and respondent. The recent publication of 2022 DIN 01-073 - Zero Tolerance to Unacceptable Sexual Behaviour: A Victim/Survivor Focused Approach adds to the likelihood of the reporting mechanisms being sufficient in practice, at least for USB. It gives further guidance on what behaviour is unacceptable, what administrative actions can be applied as a result of such behaviours. It also gives confidence to those who consider reporting, that the behaviour they are witnessing/receiving is unacceptable. The allegations reported in this ISI took place before the publication of this DIN.

3. The ISI considers that, for submariners deployed on patrol, reporting mechanisms are insufficient in practice, however when alongside, they are sufficient. None of the current mechanisms provide a way forward for the those reporting if the perpetrator is the CoC/EDA, in a deployed boat. In this situation, there may be no immediate access to a Chaplain, a Welfare team, a confidential hotline or an Ombudsman.

4. The timescales for progressing a SC are well defined, however, the resource required to effectively deal with the timeframes is not prioritised, and therefore deadlines are missed, causing additional stress on complainants. The ISI finds that communications between those involved in the reporting mechanism could be improved through adopting a victim focussed approach. The lack of timely communications to the complainant causes further additional and unnecessary stress.

5. In addition, the ISI has confirmed evidence of one CO summarily hearing an allegation of sexual assault SC at sea, which resulted in the CO directing a letter of apology to be written from the accused to the alleged victim. The ISI acknowledges that submarine COs are in a uniquely challenging position and whilst deployed are constantly trying to balance operational capability and appropriate personnel support most often with no communications back to shore. More significance should be given to developing and selecting COs who are trusted to lead well, through inculcating a people-centred approach that results in a Command Climate in which everyone can thrive whilst delivering operational requirements.

6. Recommendations to increase Sufficiency and Effectiveness of Reporting Mechanisms:

<b>Main Report Reference</b>	<b>Recommendation</b>
1	COMSUBFLOT to ensure appropriate application of the new RN Zero Tolerance policy regarding unacceptable sexual behaviour as part of the rebuilding trust within the Submarine Flotilla post introduction Nov 22 and administrative action re inappropriate behaviour pre Nov 22.

2	Every CO to produce a Command Directive <sup>61</sup> that aligns to RN and SUBFLOT Values and that the Command team is mentored, assessed, and reported on by SUBFLOT for delivering it.
3	COMSUBFLOT to monitor and assure local Command Climate to actively mitigate inappropriate decisions by those in positions of responsibility.
4	COMSUBFLOT to ensure all personnel to be informed, reminded, mentored as to their obligation to refer incidents of unacceptable behaviour – even if an individual does not want to take it further.  Direction given to SP in the CoC re their duties and what action they must take if a person who has come to them with a matter that they do not want to take it further. Eg disciplinary / criminal must refer to CO. Bullying etc put in the D&I log. To be included in CO Desig course etc.
5	COMSUBFLOT is to request Dir P&T examines how the RNP and DSCU can support Faslane better.
6	COMSUBFLOT to assure that policy (RNTM 01-078-18) is followed on all submissions of VO in that SMs are offered, and are strongly encouraged, to take part in the Exit Interview to ensure the RN has the opportunity to engage with the individual SP and understand their decision to leave the Service.
7	COMSUBFLOT to request Dir P&T review the current exit procedure (RNTM 01-078-18) to ensure data collected on mandated Exit Interviews, is used to better encourage and advertise the Leavers' Intention Survey, and to ensure transfer of potentially vulnerable service leavers into the Defence Transition Service.
8	Dir P&T to ensure all exit interviews are conducted and data captured, in the Human Performance Dashboard, is tracked and acted/reported on as appropriate.
13	COMSUBFLOT (as head of fighting arm) is to ensure selection for Perisher is carried out against both tactical skill and ability to lead through a people-centred approach.
14	Dir P&T to consider making it mandatory for all personnel to complete the DLE Active Bystander fundamentals Course. <sup>62</sup>
17	COMSUBFLOT to ensure all relevant support is communicated, signposted and available to personnel who wish to raise a complaint.
24	COMSUBFLOT consider requesting a 6-monthly report from Navy Healthcare that indicates any significant trends of mental fitness within SUBFLOT.
26	COMSUBFLOT is to ensure all Command Teams continue to update their personnel on RN policy of reporting unacceptable behaviours.
30	COMSUBFLOT to ensure correct reporting of USB related events via Dir P&T iaw published policy.

<sup>61</sup> FC letter- FC/CODC/001/24

<sup>62</sup> [Course: Active Bystander Fundamentals \(mod.gov.uk\)](https://www.mod.gov.uk/course/active-bystander-fundamentals)

**SECTION 3 - SUFFICIENCY AND EFFECTIVENESS OF RESOLUTION TOOLS.**

1. The ISI recognises that there are a number of different types of resolution available to the Service which are established and detailed in policy. These are in the most part effective but may be challenging for submarines deployed on patrol primarily due to connectivity.

2. The ISI noted the following:

a. **Lack of a Victim Centred Approach in RNP.** A common theme throughout interviews is the perceived lack of care and thought from the RNP/DSCU when investigating rape and sexual assault. The following quotes illustrate the ISI's findings:

(1) [REDACTED]

(2) [REDACTED]

(3) [REDACTED]

b. [REDACTED]

c. **Lack of Closure after alleged Mishandling of Case(s).** [REDACTED]

63 [REDACTED]  
64 [REDACTED]  
65 [REDACTED]  
66 [REDACTED]  
67 [REDACTED]  
68 [REDACTED]

3. **Specific Issues.** In addition, and more specific to SUBFLOT, use of the Service Complaints Ombudsman, the Chaplain, Mediation, and the Confidential Hotline are all limited and challenging for submariners whilst deployed. Nor is access to any of the POCs listed in JSP 831 Part 1 Annex C - Navy Legal Casework, Service Complaint Admissibility, Submission of Appeals.

4. With patrols regularly lasting a number of months with limited or no external communications, there is no mechanism to access the required points of contact. If the complaint is serious in nature, removing someone from assignment without prejudice may be difficult to achieve (due to the programme of the submarine), thereby exacerbating the effect on the alleged victim. Counselling for the alleged victim and alleged perpetrator may also be limited and not independent of the unit. The best mitigation is to prioritise the development of submarine COs who can be trusted to inculcate a positive Command Climate where inappropriate behaviour is far less likely to take place. In addition, it is advised that additional EDAs are trained in SMs, so that there is an option of who to talk to, especially if the accused is within the CoC.

5. Over the course of 43 interviews, the ISI has formed an opinion that there was a lack of Learning from Experience (LfE) and understanding of the importance of reviewing previous cases and ensuring parity across the Submarine Flotilla. It is advised that COMSUBFLOT refers back to the ISI that took place after the [REDACTED] incident and the recommendations therein.

6. Recommendations to increase Sufficiency and Effectiveness of the Resolution Tools:

Main Report Reference	Recommendation
1	COMSUBFLOT to ensure appropriate application of the new RN Zero Tolerance policy regarding unacceptable sexual behaviour as part of the rebuilding trust within the Submarine Flotilla post introduction Nov 22 and administrative action re inappropriate behaviour pre Nov 22.
3	Monitor and assure local Command Climate to actively mitigate inappropriate decisions by those in positions of responsibility.
10	COMSUBFLOT is to request that Dir P&T reviews current care provision to all alleged victims of inappropriate behaviour, particularly specialist support for all alleged victims of rape and sexual assault.
26	COMSUBFLOT is to ensure all Command Teams continue to update their personnel on RN policy of reporting unacceptable behaviours.
29	COMSUBFLOT to include the findings in this ISI to personalise a message across the Flotilla of the importance and the context of USB training, and of the intent to deal robustly with anyone whose behaviour is found to be unacceptable.
33	Dir P&T to consider uplift in EDA onboard submarines and increase EDA training availability.
34	All to continue to champion and promote and increase awareness of the activity of the Naval Service Women's Network (NSN).

**SECTION 4 - SUFFICIENCY AND EFFECTIVENESS OF SUPPORT.**

1. Whilst the ISI heard about a few individuals<sup>69</sup> who offer excellent support to alleged victims of inappropriate behaviour or criminal offences, however, the ISI notes that none of the alleged victims interviewed in the ISI felt that the totality of support they received was sufficient or effective. [REDACTED]

2. However, the ISI considers there were (and still remain) effective and sufficient sources of support available, even if SP felt unable to request support from the Divisional System, the CoC or SUBFLOT. These sources include and are not limited to the Chaplaincy, RN Welfare, the Medical Centre, DCMH, Equality Diversity Advisers, the Naval Servicewomen's Network, the RN Police and Victim Liaison Officers as required. Outside of the RN are the Service Charities, including NHS Talking Therapies, the Service Complaints' Ombudsman, the Bullying and Discrimination Helpline, and the confidential Forces line.

3. For these lines of support to be effective, SP need to be aware of their existence; to have trust in them, and to engage with them. The MyNavy app, launched in 2021, signposts the support available, under the Health and Wellbeing page. In addition, the Zero Tolerance Training and Mailbox advises SP on the support available to them<sup>72</sup>. One of the aims of the Modern Navy Communications Campaign is to build trust through publicising successful engagement in response to complaints and concerns, including actions taken, and by signposting sources of support. However, on a deployed SM, support remains limited due to connectivity whilst at sea.

**4. Considerations for COMSUBFLOT:**

a. **Executive Support.** The recurring theme from all alleged victims is that there is a requirement for support to be provided by SMEs. The ISI has heard accounts of failing support of CoCs, from [REDACTED]

<sup>69</sup> The extent of positive support feedback: [REDACTED]

<sup>70</sup> Interview with [REDACTED]

<sup>71</sup> Fear of being ostracised or having an unfair report; Fear of career fouling; Fear of lack of confidentiality; Fear of not being believed; Lack of faith or trust in the system; Inappropriate messaging from within CoC; Fear of making life difficult for the respondent.

<sup>72</sup> This will be incorporated in the RN Leadership Development Programme (para 16d).

<sup>73</sup> Interview with [REDACTED]

<sup>74</sup> Interview with [REDACTED]

b. Another alleged victim spoke about how she felt her support network was removed by the system. [REDACTED]

c. **Specialist Mental Health Support.** There is an international, national<sup>76</sup>, Service and Flotilla shortage of Mental Health treatment. The aim of activity in the prevent/promote/detect space is to ensure fewer people need treatment. There were no positive accounts of DCMH support to alleged victims in this ISI. The following account illustrates a lack of a victim/patient centred approach:

[REDACTED]

5. **Next Steps.** The RN [Leadership Role Performance Statements](#) (RPS) and [Behavioural Competency Framework](#) (BCF) are people-centred and include the requirement for leaders at all levels to understand issues around inappropriate behaviour and USB, the likely impact on Mental Health, and what they can do to best support their people in order to promote good Mental Health and prevent the requirement for treatment. This will be included in the RN Leadership Development Programme (LDP), which enters the Design Phase in 2024. Until then, the RN Mental Health Workshop can be used as a standalone part of the LDP, to educate

<sup>75</sup> [REDACTED]  
<sup>76</sup> [World Mental Health Report, World Health Organisation, 16 Jun 22.](#)  
<sup>77</sup> [REDACTED]



leaders at all levels. This is particularly important for SUBFLOT, where the more specialist support network is unavailable to deployed SMs, and all Units need to be self-sufficient in their support to all crew members.

**6. Recommendations to increase Sufficiency and Effectiveness of Support:**

Main Report Reference	Recommendation
1	COMSUBFLOT to ensure appropriate application of the new RN Zero Tolerance policy regarding unacceptable sexual behaviour as part of the rebuilding trust within the Submarine Flotilla post introduction Nov 22 and administrative action re inappropriate behaviour pre Nov 22.
2	Every CO to produce a Command Directive <sup>78</sup> that aligns to RN and SUBFLOT Values and that the Command team is mentored, assessed, and reported on by SUBFLOT for delivering it.
3	COMSUBFLOT to monitor and assure local Command Climate to actively mitigate inappropriate decisions by those in positions of responsibility.
10	COMSUBFLOT is to request that Dir P&T reviews current care provision to all alleged victims of inappropriate behaviour, particularly specialist support for all alleged victims of rape and sexual assault.
17	COMSUBFLOT to ensure all relevant support is communicated, signposted and available to personnel who wish to raise a complaint.
21	COMSUBFLOT to Request Hd Healthcare consider a review of submarine specific medical policies, procedures and processes, to review the policy for communicating medical-in-confidence information alongside and on patrol, in order to agree and reinforce patient and medical information handling/management for all submarine medical procedures, ensuring those who need to know make informed decisions at all times.
23	COMSUBFLOT and Navy Healthcare to review and agree the policy and guidance for communicating medical-in-confidence information on patrol, to ensure those who need to know make informed decisions at all times – particularly between the CO and the XO.
24	COMSUBFLOT consider requesting a 6-monthly report from Navy Healthcare that indicates any significant trends of mental fitness within SUBFLOT.
26	COMSUBFLOT is to ensure all Command Teams continue to update their personnel on RN policy of reporting unacceptable behaviours.
32	Dir P&T to enable review of complaints of service provision by DPHC/DCMH by Hd HC to identify issues and barriers including a review of external audit of DCMH Faslane, to assure a patient-centred approach that enables continuous development.
37	Dir P&T to consider resourcing specialist support to all alleged victims of sexual assault and rape, for example, Aurora New Dawn <sup>79</sup> .

<sup>78</sup> FC letter- reference

<sup>79</sup> Independent Domestic Violence Advisor (IDVA) and Independent Sexual Violence Advisor (ISVA) provision for RN personnel sexual violence, provided on a one-to-one basis, and includes emotional support, and support through the service or criminal justice process, advocacy, liaison with other agencies and referrals to additional sources of support as required.

**SECTION 5 - RECOMMENDATIONS FOR HOW AN EFFECTIVE REPORTING CULTURE COULD BE SUSTAINED.**

1. The ISI recognises over the course of the 43 interviews that there is an apprehension in coming forward and reporting matters, which, could cause further damage. The ISI notes the content of the Royal Navy Sexual Harassment Survey<sup>80</sup> 2021 which found that 75% of ‘upsetting incidents’ are unreported. Therefore, it is acknowledged that changing the culture to one where an effective reporting culture is sustained, is going to take significant resource, effort and effective messaging, in order to establish trust and respect between individuals and what they see as ‘the system’.

2. The ISI considers that the single biggest risk that will break that trust, reversing any progress towards an effective reporting culture, is the widening of the ‘say-do gap’. COMSUBFLOT, 2SL, FC and 1SL have all spoken about their resolve to support this change. Actions speak louder than words, and the submarine community who have been impacted most by inappropriate behaviour are watching carefully to see whether or not, under the new leadership, they can trust in ‘the system’. Every action, from zero tolerance through to assignment of individuals into Command positions, will be watched, discussed, and will either reverse or build progress towards an effective and sustainable reporting culture. It is unfortunately both true and frustrating that one example of a say-do gap will be more powerful than several examples of Command getting it right. Command is therefore encouraged to: scrutinise every decision, especially on USB and zero tolerance; to ensure careful assignment of individuals who are well known to have a reputation of inappropriate behaviour in the past, accepting in extremis a gap in Command over accepting assignment of an individual who might damage trust; and to message loud and clear when decisions have been taken that prioritise zero tolerance over short term operational capability challenges.

**3. Recommendations:**

Main Report Reference	Recommendation
2	Every CO to produce a Command Directive <sup>81</sup> that aligns to RN and SUBFLOT Values and that the Command team is mentored, assessed, and reported on by SUBFLOT for delivering it.
4	COMSUBFLOT to ensure all personnel to be informed, reminded, mentored as to their obligation to refer incidents of unacceptable behaviour – even if an individual does not want to take it further.  Direction given to SP in the CoC re their duties and what action they must take if a person who has come to them with a matter that they do not want to take it further. Eg disciplinary / criminal must refer to CO. Bullying etc put in the DNI log. To be included in CO Desig course etc.
14	Dir P&T to consider making it mandatory for all personnel to complete the DLE Active Bystander fundamentals Course. <sup>82</sup>
26	COMSUBFLOT is to ensure all Command Teams continue to update their personnel on RN policy of reporting unacceptable behaviours.

<sup>80</sup> [Royal Navy Sexual Harassment Survey 2021, published 31 Mar 22](#), found that 75% of ‘upsetting incidents’ are unreported.

<sup>81</sup> FC letter- reference

<sup>82</sup> [Course: Active Bystander Fundamentals \(mod.gov.uk\)](#)

Annex F to  
 ISI\_SUBFLOT  
 21 Dec 23

Timeline of allegations made by [REDACTED]

Sep 2011

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2014

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2015

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2016

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2017

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2018

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]

2019

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2020

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2021

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

2022

Dates	Location	Event
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]