



Ministry
of Defence

JSP 816 Element 1: Leadership, Governance and Culture



Element 1: Leadership, Governance and Culture

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Amendment record

1. This chapter has been reviewed by the Directorate of Climate Change and Environment together with relevant subject matter experts and key environmental stakeholders. Any suggestions for amendments should be sent to: SPOCCE-EP@mod.gov.uk

Version No	Date	Text Affected	Authority
1.0	Feb 22	BETA version for consultation	Dir CCE
2.0	Dec 23	Final version	CCE
2.1	Dec 24	Annual revision and combined element and assurance framework.	CCE

Terms and definitions

2. General environmental protection terms and definitions are provided in the [Master Glossary of Environmental Terms and Definitions](#).

Use of must and should

3. Where this chapter says must, this means that the action is a compulsory requirement.
4. Where this chapter says should, this means that the action is not a compulsory requirement but is considered best practice to comply with the policy.

Scope

5. This policy applies to all those employed by Defence (military or civilian) as well as those working on behalf of Defence (for example, contractors). It applies to all Defence activities carried out in any location (UK or overseas).

Introduction

6. 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 promoting leadership, governance and culture that are set out in this Element.

Purpose and expectations

7. This element focuses on the extent that an organisation is forward-thinking and that it has clear aims and objectives about what it wants to achieve. Together with effective leadership, governance methods, organisations are to promote a consistent approach to environmental management at all levels and support a positive, proactive culture of reporting and learning. This is reinforced by establishing accountability based on well-defined authority levels and a clear understanding of responsibilities.

E1.1 Leadership sets the ‘tone from the top’ and actively demonstrates their commitment to environmental management.

E1.2 Leadership promotes a culture of continual improvement, championing the environment, and embedding transparent and open reporting.

E1.3 Leadership sets clear environmental management responsibilities through which the organisation is measured and held to account.

E1.4 Leadership is visible at all levels of the Defence Organisation; including through direct interactions with the wider workforce and other stakeholders on matters of environmental management.

E1.5 Corporate governance ensures that the environmental aims and objectives of the organisations are compatible with Defence strategic direction.

E1.6 A culture is in place that encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognises them for it.

Strategic intent and vision for environmental policy for Defence

8. Defence faces a challenge: the need to protect and enhance our environment, adapt and be resilient in the changing climate whilst preserving military capability. It is critical that Defence continues to explore and understand how its activities influence and contribute to the changing environment, and better understand how a changing environment impacts Defence.

9. An environmental policy defines the strategic direction of an organisation with respect to the environment. The environmental policy provides a framework for establishing environmental objectives and sets the level of responsibility and performance required, against which subsequent actions can be measured. Policy, legislation and regulations are covered in more depth in Element 3 of this JSP.

Aims and objectives

10. Aims and objectives can be strategic, operational or tactical. When establishing, reviewing and applying actions to achieve environmental objectives, a systematic basis for the organisation should be developed to improve environmental performance in some areas, while maintaining its level of environmental performance in others.

11. Outlining clear aims and objectives ensures that all stakeholders are aligned and effectively implementing their environmental management plans. Environmental objectives must be part of the organisation's overall management objectives as this enhances both the value of the Environmental Management Systems (EMS) and Defence's environmental commitments.

12. Environmental objectives should be established at the organisation's highest level as well as at other levels where activities that are important to achieving the environmental policy commitments and overall organisational goals are carried out. They should also be consistent with the environmental policy and commitments to the protection and enhancement of the environment, including fulfilment of compliance obligations, preventing pollution, reducing environmental impacts, promoting biodiversity, creating green spaces, preventing climate change, and continual improvement.

13. Environmental objectives should have a clear thread drawn from Defence strategic planning and performance framework. Objectives must have support and enable the delivery of Defence enabling objectives. This link should be documented clearly through EMS` and related documents.

14. When establishing environmental objectives, an organisation should consider inputs, including:

- a. principles and commitments in its environmental policy.
- b. its significant environmental aspects (and information developed in determining them).
- c. its compliance obligations.
- d. risks and opportunities that need to be addressed, related to other issues and requirements affecting the environmental management system.
- e. effects of achieving environmental objectives on activities.
- f. other organisational goals.

15. When setting environmental objectives, it is important to determine whether they are:

- a. expressed directly as a specific performance level or in a general manner and further defined by one or more targets (which have specific timeframes).
- b. applicable across the organisation or more narrowly to site specific or individual activities.
- c. contributed to at different levels and functions of the organisation, or by others in the value chain or across the Department; if so those individuals must be aware of their responsibilities.

- d. clearly documented and communicated.
- e. able to be tracked and progress monitored.

16. When planning actions to achieve environmental objectives, the relevant programmes should address roles, responsibilities, processes, resources, timeframes, priorities and the actions necessary for achieving the objectives. These programmes should be dynamic and when changes occur, they should be revised as necessary.

Authorities and legislation

17. The environment is an area of devolved power in the UK and the Devolved Administrations therefore have the right to bring forward their own environmental protection legislation. Within the UK there are four differing regulatory regimes for environmental protection; the differences can be subtle, but the impact of non-compliance may be significant.

18. Defence operates throughout the UK and needs to be aware of the differing requirements in each of the four UK territories to achieve compliance in meeting differing statutory requirements. When overseas, Defence should apply the most stringent measures where reasonably practicable and understand their host nations' relevant environmental requirements. Further guidance is provided in Element 3 of this JSP.

19. Except in specified cases where Defence has a Derogation, Exemption or Disapplication (DED), its activities in the UK are subject to the requirements of environmental protection legislation and thus regulation by Statutory Regulators. Within the UK territories the Statutory Regulators and advisory organisations with primary duties to protect the environment include:

- a. England – the Environment Agency (EA), Natural England (NE), Marine Management Organisation (MMO), Historic England (HE), Marine Coastguard Agency (MCA) and Local Authorities (LAs).
- b. Scotland – Scottish Environment Protection Agency (SEPA), NatureScot (NS), Marine Scotland and LAs.
- c. Wales – Natural Resources Wales (NRW), Cadw, Welsh Government Office and LAs.
- d. Northern Ireland – Northern Ireland Environment Agency (NIEA).

Leadership, governance and culture

Leadership

20. The Secretary of State's (SofS) Policy Statement for Health, Safety and Environmental Protection (HS&EP) applies to everyone within Defence, including contractors and partner organisations. The Policy Statement is a commitment of the SofS's personal leadership in HS&EP and as such the SofS relies on all those in leadership roles to make sure the policy is applied.

21. The policy establishes the structure for Defence to conduct environment management. Organisation leadership should show their personal and collective commitment to this area and ensure the SofS policy is applied.

22. Senior leaders of Defence organisations should lead on HS&EP through the responsibilities set out in their letters of delegation issued by the Permanent Secretary (or equivalent delegated authority). They are to make sure that their Defence activities are delivered in line with the Defence Environmental Management System (DEMS) and their own EMS. The DEMS amplifies the SofS Policy Statement and describes the environmental guidance and principles to be followed by Defence organisations.
23. Leadership should demonstrate a commitment to managing the environment within their organisation by setting a clear tone from the top, promoting the Defence vision for EM by:
- a. taking overall responsibility and accountability for the prevention of Defence related environmental degradation.
 - b. maintaining, continually monitoring and improving policies and procedures, and ensure there is an effective system in place to stay informed about changing policies.
 - c. making sure that they are visible across their organisation by prioritising environmental objectives alongside other strategic objectives.
 - d. communicating the importance of effective EM and of conforming to the EMS requirements using a range of communication methods.
 - e. regularly review environmental performance at leadership meetings.
 - f. developing, leading and promoting a culture in the organisation which supports the intended outcomes of the EMS.
 - g. ensuring the organisation establishes and implements processes for continuous engagement via consultation and participation of the workforce and other stakeholders.
 - h. encouraging the workforce and stakeholders to identify areas for improvement, leading to continual improvement in EM through collaboration and innovation.
 - i. promoting open and transparent reporting, environmental actions and behaviours, i.e. culture changes that need to be made to improve and embed environmental protection.
 - j. communicating effectively lessons identified in one area, across all areas.
 - k. driving continual improvement of environmental performance management.
 - l. effective oversight of action plans.
24. Practical examples of leadership environmental commitment can include:
- a. environmental 'advocacy' by leaders; taking clear and informed positions on environmental issues inside and outside the organisation (e.g. within organisation management meetings).
 - b. direct and visible involvement in the identification and mitigation of environmental risks and the investigation of environmental incidents.

- c. routine participation in site inspections and audits which address environmental issues.
- d. the active and tangible encouragement of the workforce to participate in environmental improvement at work and at home.

25. The leadership and commitment of senior management are critical to the integration of the EMS into the business process. Integration is an ongoing process, and benefits can increase over time with continual improvement. This can enhance the organisation's ability to operate more effectively and efficiently, through sharing of processes and resources and to deliver increased value by being more closely associated with those processes that the organisation depends upon to operate.

26. Opportunities for the Defence Organisation to integrate EM activities into its business process include the incorporation of:

- a. intended environmental outcomes or objectives of the environmental management system in the organisation's vision or strategy.
- b. environmental policy commitments into the governance of the organisation.
- c. environmental management system responsibilities within job descriptions.
- d. environmental performance indicators within the organisation's business performance systems, e.g. appraisals, KPIs.
- e. environmental performance in external (non-MOD) reporting, e.g. sustainability reports.
- f. processes for determining significant environmental aspects and other risks and opportunities affecting the EMS into its standard business risk management process(es).
- g. environmental criteria in business process planning, product or service design, and procurement processes.
- h. environmental communication into business communication, engagement channels and processes, e.g. public relations.

27. These activities will require a holistic and cross-Department approach, whereby Defence organisations and TLBs should seek to actively collaborate and communicate with others.

Governance

28. The Defence Safety and Environment Committee (DSEC) is the principal forum within Defence responsible for the governance of environment. The DSEC is supported as necessary by sub-committees and working groups comprised of representatives of the DSEC members and environmental representatives from other Defence organisations.

29. Defence organisations are to establish their own governance arrangements and framework. The Defence organisation's governance arrangements should include a hierarchy and structure of EM forums with agreed terms of reference, a timetable of scheduled meetings. These governance arrangements should be coherent with Defence

wide governance and have a formal communication route that is understood by the organisation.

30. Environmental governance within Defence organisations should provide leadership oversight, challenge and review of environmental policies, procedures, performance and effectiveness of the organisation's EMS.

Culture

31. Culture can be best understood as the ideas, customs and behaviours of an organisation and the teams within it. [Environmental culture](#) can be defined, as 'the total of learned behaviour, attitudes, practices and knowledge that a society has with respect to maintaining or protecting its natural resources, the ecosystem and all other external conditions affecting human life'.

32. The strategic direction of the Defence organisation can influence how individuals within Defence behave in relation to the environment and defines the culture of the organisation.

33. Building a strong culture of environmental responsibility goes beyond morally doing the right thing; it is vital to managing and minimising environmental risks and impacts and has indisputable reputational benefits for Defence. Defence should support open and honest reporting and set a culture where everyone feels able to speak up, rather than fearing blame. They should develop and maintain policies and processes that develop and promote a positive environmental culture throughout their organisation and area of responsibility, they should share and effectively communicate good practice and any environmental lessons identified in order to promote and support continual improvement.

34. A positive environmental culture within an organisation is dependent on the following:

a. **Leadership commitment.** To motivate others and show a concern for environmental practice in line with strategic direction. It is indicated by the proportion of resources (time, money, people) and support allocated to EM and by the status given versus delivery/output, cost etc. The active involvement of senior management in the EM system is vital.

b. **Visible management.** All leaders are role models and everyone needs to be seen to lead by example when it comes to environmental practices. Leaders should be available to openly talk about environmental issues, protection and sustainability, and facilitate open discussion to share challenges and opportunities. It is important that these leaders are seen as committed to EM through both their words and their actions.

c. **Strong communications between all levels of personnel.** In a positive culture, questions about EM should be part of everyday work conversations, and challenge encouraged. People should not only ask but, listen actively to what they are being told by others, and act on this. Active personnel participation in EM is important, to build ownership of all levels and exploit the unique knowledge that personnel have their own work. In organisations with a good environmental culture, personnel and leaders will be consistent, and EM is seen as a joint exercise to help change things for the better.

d. **Effective decision making.** EM needs to be fully embedded within all aspects of an organisation's evidence-based decision-making processes.

35. Practical examples of a positive environmental culture can include:
- a. demonstrable evidence of the reduction of quantifiable environmental impacts and risks, e.g. compliance, waste, and energy use reduction.
 - b. compliance with the Defence EMS.
 - c. effective environmental incident reporting and effective feedback and learning.
 - d. management decisions that consistently consider the environment during decision making.
 - e. educating the workforce and supply chain about environmental issues and how they can take action to reduce their environmental impact e.g. providing training on sustainability, sharing information on environmental initiatives and encouraging feedback and ideas.
 - f. Active collaboration within and outside the organisation to understand and promote the protection and enhancement of the environment e.g. forming supply chain partnerships and working with community organisations.

Roles and responsibilities

36. The people listed in the below table are responsible for environmental protection within an organisation, this list is not exhaustive. Examples of environmental protection roles include:

Role	Responsibility
Defence Safety Authority (DSA)	Responsible for the regulation of Defence Health, Safety and Environmental Protection. Defence Environmental Protection Regulator is responsible for third-party assurance, regulation and enforcement of environmental protection across Defence.
Chief Environment and Safety Officer (CESO)	Provides policy, advice and guidance in respect of environmental protection which includes monitoring and measuring the level of EMS implementation and undertaking annual reviews of this.
Heads of Capability	Decisions made by Heads of Capability are vital to setting good contractual requirements and managing environmental impact. They are responsible for ensuring that environmental concerns are taken into consideration during the decision-making process.
TLB Holders	TLB Holders are to conduct Defence activities in their area of responsibility safely, environmentally responsibly and compliant with legislation. Duties are delegated to those with direct responsibility for managing Defence activities.
Environmental Protection Officer (EPO/SHEF)	Responsible for creating and maintaining the site EMS by seeking out and confirming appropriate focal points for all stakeholders that operate on their site. They must also conduct a review of the site EMS on an annual basis.
Operating Centres	Liaise with delivery teams to ensure that information needed for Project Oriented Environmental Management Systems (POEMS) is in place and communicate with front line commands to ensure it is being implemented correctly.

Head of Establishment (HoE)	Responsible for the effective implementation of their site's EMS. They are to assign a representative with sufficient authority, awareness, competence and resources to ensure successful establishment, implementation and maintenance of the EMS.
Employees	Under environmental protection legislation, employees have duties and should be made aware of those through site producers and systems.

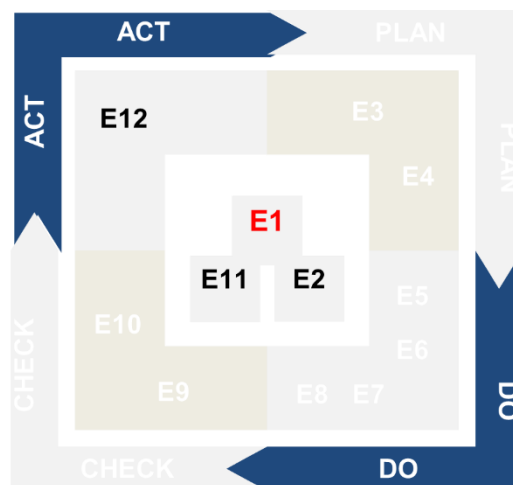
Element summary

37. Defence organisation senior leadership should:

- a. set the 'tone from the top' and actively demonstrate their commitment to EM.
- b. promote a culture of continual improvement, championing the environment and embedding transparent and open reporting.
- c. set clear EM responsibilities by which the organisation is measured and held to account.
- d. be visible at all levels of the organisation; including through direct interactions with the wider workforce and supply chain on matters of EM.
- e. support the alignment of environmental aims and objectives with Defence's strategic direction.
- f. contribute to a culture which encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognise them for it.

Plan- Do- Check- Act- (PDCA) Cycle

38. This diagram is designed to illustrate where this, and all the Elements of JSP 816, fit into the PDCA cycle.



Element assurance framework

39. This element requires that there is a focus on the extent to which a Defence organisation has a vision, clear aims and objectives about what it can and wants to achieve in terms of environmental protection. Together with effective leadership, governance methods to promote a consistent approach to environmental management at all levels and support a positive, proactive culture of reporting and learning. This is supported by establishing accountability based on well-defined authority levels, acceptance of decision-making and a clear understanding of responsibilities.

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

Element 1: Leadership, Governance and Culture

The expectations in this element are:

E1.1 Leadership sets the 'tone from the top' and actively demonstrate their commitment to Environmental Management.

E1.2 Leadership promotes a culture of continual improvement, championing the Environment, and embedding transparent and open reporting.

E1.3 Leadership sets clear Environmental Management responsibilities through which the organisation is measured and held to account.

E1.4 Leadership is visible at all levels of the Defence Organisation; including through direct interactions with the wider workforce and other stakeholders on matters of Environmental Management.

E1.5 Corporate governance ensures that the Environmental aims and objectives of the organisations are compatible with Defence strategic direction.

E1.6 A culture is in place that encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognises them for it.

Documents often associated with this element:

- Agenda and minutes of the relevant committee meetings (Strategic, Tactical and Working)
- Annual Budget Cycle (ABC) planning (for inclusion of Health, Safety and Environment requirements)
- Command / Corporate plan
- Continual Improvement (CI) logs
- Contract management and supply chain management plans
- Corrective action plans
- Defence organisation business plans
- Defence organisation Operating Model
- Defence organisation EMS
- Delegations / letters of appointment and formal acceptance
- Establishment Management Plans
- Health and Safety and Environmental Protection (HS&EP) Organisation and Arrangement (O&A) statement
- Joint Basing Arrangements (JBAs)
- Key Performance Indicator (KPI) targets and metrics
- Memorandums of Understanding (MOUs)
- People survey or equivalent, e.g. Attitude Survey
- Review period of KPIs by a governance forum
- Senior Leadership Team (SLT) walk arounds & townhall briefings
- Service Level Agreements (SLAs)

Expectation 1.1 Leadership sets the ‘tone from the top’ and actively demonstrate their commitment to Environmental Management.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • There is no evidence of effective leadership relating to Environmental Management. • Employees are not consistently aware of the Defence organisation’s environmental goals. 	<ul style="list-style-type: none"> • There is limited evidence of leadership messaging relating to Environmental Management that inspires others within the Defence organisation. • There is limited evidence to show that employees understand how they contribute to achieving the Defence organisation’s environmental goals and act accordingly. 	<ul style="list-style-type: none"> • There is evidence of leadership behaviours that inspire others within the Defence organisation to work to deliver against the Environmental Management vision of the organisation (e.g., actively referencing and addressing environmental issues in meetings and communication). • There is evidence to show that employees know how they contribute to achieving the organisation’s environmental goals but with minor weaknesses in understanding the organisation’s relevant policies and vision of the senior team and acting accordingly. 	<ul style="list-style-type: none"> • Leadership have set a vision and a clear tone from the top on Environmental Management. • Leadership is visible in the workplace and demonstrate their commitment to Environmental Management not just through words but via their individual actions and behaviours that clearly demonstrate to the workforce that they prioritise the environment alongside other business objectives. Examples include specifically prioritising the discussion of environmental issues and ensuring these are given due priority when balancing against other operational activities.

Expectation 1.2 Leadership promotes a culture of continual improvement, championing the environment, and embedding transparent and open reporting.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> Leadership do not take action to support open and transparent reporting. There is no systematic process for open reporting and ensuring that corrective actions are completed. As such, the Defence organisation does not know if lessons are being learned from environmental impact incidents and cannot demonstrate continual improvement or a learning culture. 	<ul style="list-style-type: none"> Leadership speaks about the importance of open and transparent reporting, but this messaging is not consistent across the Defence organisation. There is limited evidence of the use of open reporting systems leading to effective corrective action, and this is not consistent. 	<ul style="list-style-type: none"> Leadership consistently takes responsibility for developing and promoting an open and transparent reporting culture across the Defence organisation that supports effective Environmental management. There is evidence of effective use of open reporting systems (e.g., incident reports, near miss reports, continual improvement suggestions in meetings), with only minor weaknesses in the effectiveness of corrective actions undertaken. 	<ul style="list-style-type: none"> Leaders support openness and learning by making personnel feel confident to speak up when things go wrong, rather than fearing blame. Actions and decisions are understood before they are judged, and people are supported to learn from their actions. People are asked for their advice to help with designing the systems that could help change things for the better.

Expectation 1.3 Leadership sets clear Environmental Management responsibilities through which the organisation is measured and held to account.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • Most, if not all, of the Defence organisation workforce do not have defined Environmental Management roles and/or responsibilities. • Performance on Environmental Management is not considered during the performance appraisal process. 	<ul style="list-style-type: none"> • Some of the Defence organisation workforce have defined Environmental Management roles and/or responsibilities. • Where roles require some of the Defence organisation workforce have Environmental Management objectives defined in their annual objectives, but this is not done consistently. • Performance on Environmental Management is considered during the performance appraisal process, but this is not done consistently. 	<ul style="list-style-type: none"> • Most of the Defence organisation workforce, but not all, have defined Environmental Management roles and/or responsibilities. • Where roles require most, but not all, of the Defence organisation workforce have Environmental Management objectives defined in their annual objectives, and this is largely consistent. • Performance on environmental management is consistently considered during the performance appraisal process. 	<ul style="list-style-type: none"> • Everyone in the Defence organisation has defined Environmental Management roles and/or responsibilities. • Where roles require all of the Defence organisation workforce have Environmental Management objectives defined in their annual objectives, and this is applied consistently. • Driving continual improvement in Environmental Management is valued, rewarded, and recognised by leadership.

Expectation 1.4 Leadership is visible at all levels of the Defence organisation including through direct interactions with the wider workforce and other stakeholders on matters of Environmental Management.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • Leadership shows little or no consideration of environmental issues or externalities. • Throughout the Defence organisation, individuals do not believe that leadership are interested in mitigating environmental impacts. • There is no communication from leadership to stakeholders regarding environmental performance and issues. 	<ul style="list-style-type: none"> • Leadership considers Environmental management, but not in a consistent manner nor its effects on outputs. • Individuals across the Defence organisation believe that leadership is interested in reducing environmental impacts and are taking proper mitigative action. • Leadership communicates on adhoc basis on Environmental Management performance and issues to stakeholders. 	<ul style="list-style-type: none"> • Leadership demonstrates and articulates a clear, wide- ranging understanding of Environmental impacts and risks. • Environmental Management matters are formally discussed by leadership and regularly assessed to reduce risks and impacts. • Leadership takes action to equip stakeholders with sufficient and relevant information to allow them to challenge on Environmental Management issues as appropriate. 	<ul style="list-style-type: none"> • Leadership has continual engagement with the wider workforce and other stakeholders on Environmental Management. • Leadership meets and regularly reviews Environmental performance at leadership meetings beyond formal environmental committee meetings. This is evident to the workforce. • Leadership encourages stakeholders to identify areas for improvement, leading to continual improvement in Environmental Management through collaboration and innovation, including providing necessary resources.

Expectation 1.5 Corporate governance ensures that the environmental aims and objectives of the organisation are compatible with Defence strategic direction.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • There is no evidence that corporate governance aligns the Environmental aims and objectives of the organisation with Defence strategic direction. • There are no governance arrangements in place to demonstrate that the EMS has delivered its intended objectives, and there is no assessment conducted by leadership of monitoring and audits. 	<ul style="list-style-type: none"> • There is limited evidence of understanding and support for the role of corporate governance in setting Environmental Management objectives and review. • There are corporate governance arrangements in place but these do not always align with the organisational risk profile and strategies. Reviews are limited to simple data such as outcomes and status of actions from previous management reviews. 	<ul style="list-style-type: none"> • There is evidence that management reviews result in effective changes to Environmental risk and impact mitigation. • Corporate governance arrangements for Environmental Management systematically include lessons learned from events in other Defence organisations and other industries and include measures to assess the outcome of changes made. • Corporate governance for Environmental Management includes leading and lagging indicators of performance. • Corporate governance for Environmental Management is sometimes held equally to other strategic Defence objectives. 	<ul style="list-style-type: none"> • Corporate governance for Environmental Management arrangements are regularly improved and reviewed by leadership • Reviews are carried out routinely and result in continual improvement of Environmental Management. Outputs are shared widely to improve the corporate governance profile of the Defence organisation. • Defence organisations consider Environmental Management as equal to other strategic objectives.

Expectation 1.6 A culture is in place that encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognises them for it.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> • There is no evidence to demonstrate that senior leadership are truly interested in Environmental Management. Rather, it appears to be viewed as a 'tick box' requirement which hinders rather than enables delivery of Defence organisation priorities. • There is no evidence that the EMS is seen as important or has been communicated outside of the team of Environmental Management experts. 	<ul style="list-style-type: none"> • Leadership gathers anecdotal evidence about the wider Defence organisation's culture and behaviour towards Environmental Management and considers this when designing and implementing policy. • There is limited evidence of effective environmental behaviours among the workforce, with limited participation in Environmental Management activities. 	<ul style="list-style-type: none"> • Environmental culture and behaviours are included in culture surveys. • Results are reviewed by the team commissioning and organising the survey(s) and corrective actions are proposed to leadership and considered for implementation. • There is good evidence of effective environmental impact behaviours and engagement in Environmental Management. 	<ul style="list-style-type: none"> • Bespoke Environmental Management culture and behaviour surveys are completed and responded to on a regular basis. The outcomes are reviewed by leadership of appropriate seniority. Corrective actions are consistently identified, implemented, and their impact is monitored. • The organisation rewards those who demonstrate positive environmental behaviours. • There is clear evidence of widespread effective environmental behaviours and active engagement in Environmental Management.