



Ministry  
of Defence

# JSP 816 Element 11: Communications and Stakeholder Engagement



# Element 11: Communications and Stakeholder Engagement

## Contents

Title	Page
Amendment record	1
Terms and definitions	1
Scope	2
Introduction	2
Purpose and expectations	2
Identification of stakeholders	2
Reporting environmental incidents and concerns about environmental issues	6
Element summary	7
Plan-Do-Check-Act (PDCA) Cycle	7
Element assurance framework	8
Expectations and performance statements	9

## 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](mailto: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.

### 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 guidance and best practice that should be followed and will assist users to comply with the expectations for communication and stakeholder engagement.

## Purpose and expectations

7. This element focuses on the mechanisms the Defence Organisation has in place to identify its internal and external stakeholders and communicate and engage with these stakeholders on matters relating to environmental management (EM).

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

**E11.2** The Defence Organisation has mechanisms in place to manage and engage with stakeholders; and to consult on environmental matters, including with the environmental Regulators, OGDs, suppliers, contractors and any others affected by the organisation's activities.

**E11.3** The Defence Organisation works with its stakeholders to build effective working relations to drive continual improvement in environmental management.

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

**E11.5** The Defence Organisation has clear mechanisms in place to enable all people to raise feedback on its environmental management policies and practices, anonymously where needed.

## Identification of stakeholders

8. Stakeholder identification may differ between Defence Organisations and units depending on its size and nature, supply chain and risk profile particularly where stakeholder identification is combined within a broader stakeholder management plan. Regardless of the overall approach, the following four stage approach should be common to all communications and stakeholder engagement exercises:

- a. identify.
- b. engage.
- c. consult.
- d. communicate.

## Identify

9. Defence Organisations should identify the stakeholders who are impacted by its activities and understand their needs and expectations. Needs and expectations can be both internal and external to the Defence Organisation. This information should be used, to inform the design of their Environmental Management System (EMS), particularly the identification of environmental risks and opportunities (refer to Element 4), and their stakeholder engagement planning.

10. A stakeholder mapping exercise is a good way to consider stakeholder influence and impact, prioritise engagement and assist organisations in developing a 'communications and engagement plan'. The plan should be reviewed and updated as appropriate and should consist of:

- a. a set of communication and engagement objectives that are agreed with key stakeholders and approved by senior leaders.
- b. a stakeholder map, identifying target stakeholders / audiences, their needs, and expectations (including information needs), and the methods / channels for communications and engagement.
- c. a description of how identified needs and expectations are addressed by the EMS.
- d. a forward plan of tactical activity to deliver against the specific objectives.
- e. a method of evaluating the impact / success of the communication and engagement activities (ideally with metrics). Any findings should be acted on to improve delivery against objectives and increase stakeholder satisfaction and participation.

11. Defence Organisations should understand and fulfil their legal obligations and regulatory requirements with regards to EM stakeholder engagement and communication which should be clearly identified and understood at every level of the organisation.

## Engage

12. Defence Organisations should understand the influence that internal and external stakeholders have on their activities. They should establish, implement, and maintain a process for stakeholder engagement and consultation which is likely to include:

- a. providing mechanisms, time, training, and the resources necessary for consultation and participation
- b. providing timely access to clear, understandable, and relevant information about their EMS.
- c. determining and removing obstacles or barriers to participation and minimising those which cannot be removed.
- d. making all stakeholders aware of their roles with respect to communication on environmental matters.

- e. emphasising the consultation of personnel at all levels (particularly those carrying out the work activities or impacted by it):
  - (1) determining the needs and expectations of interested parties.
  - (2) understanding relevant environmental legislation, policy and regulations.
  - (3) assigning organisational roles, responsibilities, and authorities, as applicable.
  - (4) determining how to fulfil legal requirements and other requirements.
  - (5) establishing environmental objectives and planning to achieve them.
  - (6) determining applicable controls for outsourcing, procurement and contractors.
  - (7) determining what needs to be monitored, measured and evaluated.
  - (8) planning, establishing, implementing, and maintaining an audit programme.
  - (9) ensuring continual improvement.
- f. emphasise the participation of the workforce in the following:
  - (1) determining the mechanisms for their consultation and participation.
  - (2) identifying and assessing environmental risks and opportunities.
  - (3) determining actions to reduce environmental risks.
  - (4) determining competence requirements, training needs, training and evaluating training.
  - (5) determining what needs to be communicated and how this will be done.
  - (6) determining control measures and their effective implementation.
  - (7) investigating environmental occurrences and determining corrective actions.

13. Defence Organisations should engage with the Director CCE and DG DSA on specific environmental issues that may prevent the Defence Organisation from complying with environmental legislation or Defence policy and regulations. Defence Organisations should also consult if they identify environmental risks and issues which may have a Defence level impact.

## **Consult**

14. Director CCE uses the CC&S Steering Group and the EP Functional Delivery Group (FDG E) to consider and address pan-Defence strategic EP issues. Defence Organisations should support these groups, providing suitable representatives and avoiding delegation of attendance where possible. Defence Organisations should use these forums to raise awareness of the environmental risks, issues and challenges

affecting their own organisation and share good practice and lessons learned to help drive continuous improvement.

15. Defence Organisations should establish their own structure of committees, forums, and meetings to maintain awareness of current and potential future issues. Director CCE should be invited to any organisation committee meetings, in line with the letters of delegation from the Permanent Secretary.

16. Defence Organisations are consulted on all EP policy reviews and updates through the FDG E, or specific policy review groups led by the Director CCE. Defence Organisations are to provide appropriate resources (often those with subject matter expertise) to assist with the development of new or to review and update existing environmental policy.

17. Consultation is a two-way process, so as well as making sure that EP direction and guidance is communicated to all levels of the organisation by senior leaders, Defence organisations should encourage all personnel to raise concerns within the chain of command and to consult with others as needed.

## **Communicate**

18. As part of the EMS, Defence Organisations will be required to develop a procedure to report internally and externally on how their activities affect the environment. The procedure should define:

- a. what information needs to be communicated.
- b. when, or under what circumstances, it needs to be communicated.
- c. to whom it needs to be communicated.
- d. how it will be communicated.

19. Communication should motivate personnel to continual improvements in environmental performance and promote public understanding and acceptance of MOD activities. Effective communication should demonstrate commitment and deal with the concerns of staff and the public about issues related to the environmental aspects or the organisation's activities.

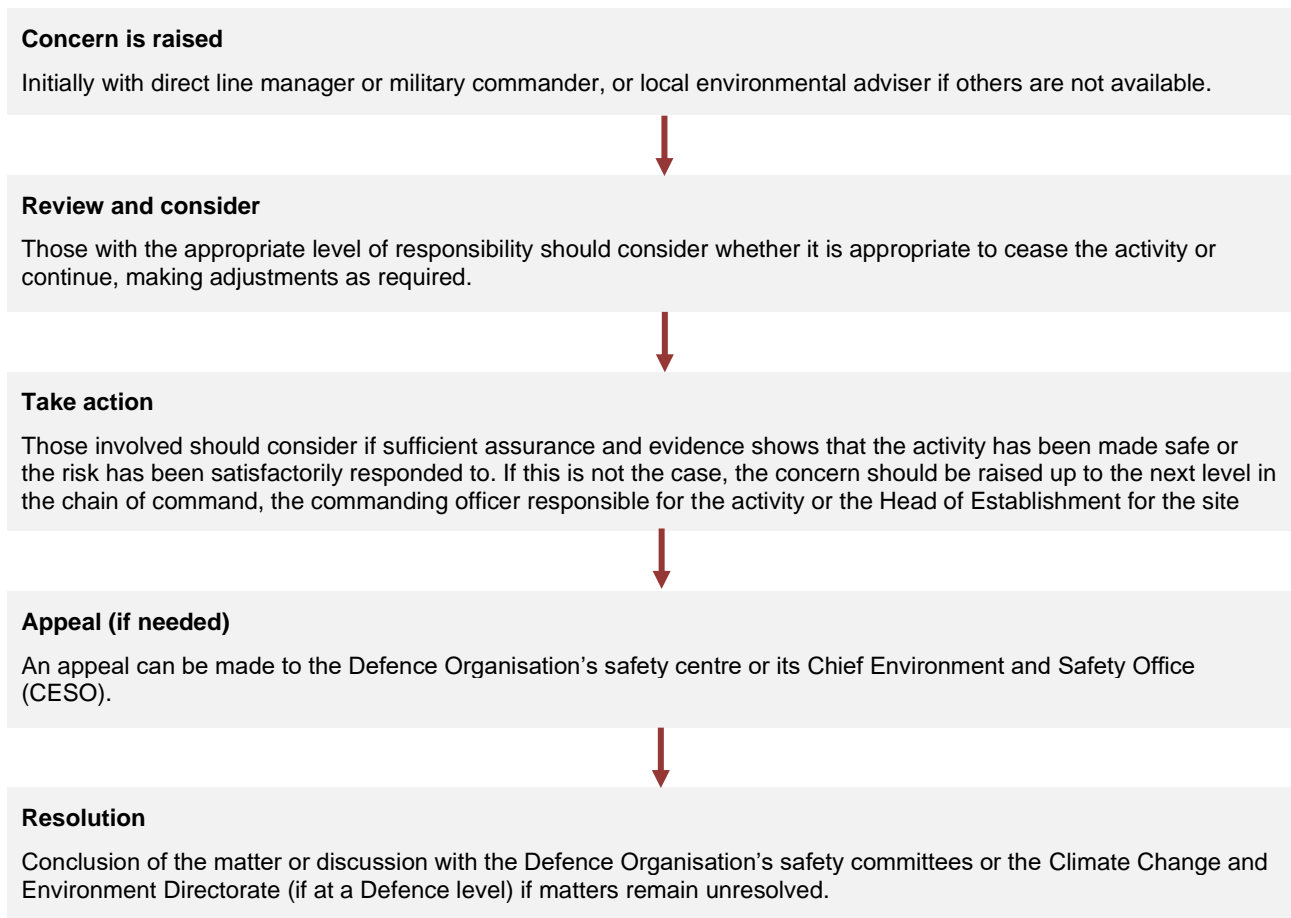
20. Internal Communications. The motivation of personnel towards proper regard for environmental concerns is vital and may be enhanced, for example, through positive recognition of good performance when environmental objectives and targets are achieved. A mechanism should be established for communicating current environmental issues to all levels and debate should be encouraged to generate ideas in order to improve site environmental performance. This can be achieved through the large range of media available for effective communication, ranging from internal memos to a full-scale annual environmental report, including regular meetings, notice boards, newsletters, emails, e-newsletters, suggestion schemes etc.

21. External Communications. Regular contact should be encouraged with regulatory authorities, local authorities, and where appropriate, pressure groups and Non-Government Organisations (NGOs), using agreed communication channels (see JSP 418 on Freedom of Access to Environmental Information). A system for recording and dealing

rapidly with any complaints should be established. Organisations should record their decision to communicate significant environmental aspects to the public.

## Reporting environmental incidents or raising concerns about environmental issues

22. Defence Organisations must have a process in place, to enable environmental concerns and environmental incidents to be reported and for appropriate actions to be taken. The reporting of environmental incidents is set out in JSP 418 (Management of Environmental Protection in Defence). The process should have clear, sequential steps to follow, until the issue is resolved or addressed at an appropriate level within the organisation's chain of command. The following steps are a good example:



*Figure 1: Reporting environmental incidents and raising EP concerns*

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

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



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

- a. telephone - 0800 161 3665 (STD) or +44 1371 85 4881 (overseas).
- b. email - [confidential-hotline@mod.gov.uk](mailto:confidential-hotline@mod.gov.uk)

26. All concerns must be handled responsibly, professionally and in a positive manner. MOD will not tolerate the victimisation of anyone raising a concern, and robust action will be taken against anyone found to be responsible for such actions. Further details regarding the complaints procedures are set out in [JSP 763 - Behaviours and Informal Complaints Resolution](#).

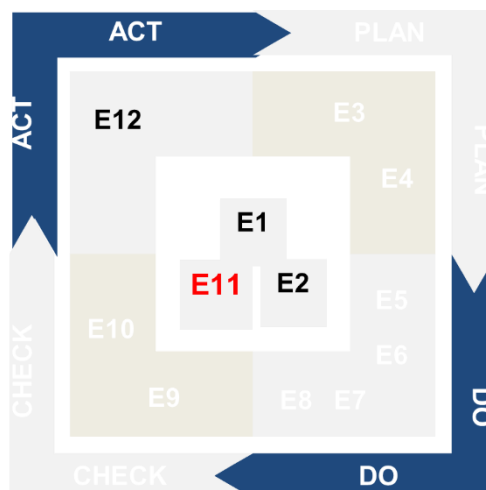
## Element summary

27. Defence Organisation leaders should ensure that their organisations:

- a. have mechanisms in place to identify internal and external stakeholders and understand their role and purpose in environmental matters.
- b. have mechanisms in place to manage and engage with stakeholders and to consult on environmental matters, including with the workforce, environmental regulators, suppliers, contractors, and others affected by the organisation's activities.
- c. work with its stakeholders to build effective working relations to drive continual improvement.
- d. have mechanisms in place to allow all people, contractors, and the supply chain to easily access up to date information relevant to their roles.
- e. have mechanisms in place to enable people to raise environmental-related concerns.

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

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





## **Element assurance framework**

29. The focus of this element requires that the Defence Organisation has mechanisms in place to identify its internal and external stakeholders and communicate and engage with these stakeholders on Environmental Management matters and the reporting of environmental incidents or to generally raise concerns about environmental issues.

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

## Expectations and performance statements

### Element 11: Communications and Stakeholder Engagement

The expectations in this element are:

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

**E11.2** The Defence Organisation has mechanisms in place to manage and engage with stakeholders; and to consult on Environmental matters, including with the Environmental Regulators, OGDs, suppliers, contractors and any others affected by the organisation's activities.

**E11.3** The Defence Organisation works with its stakeholders to build effective working relations to drive continual improvement in Environmental management.

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

**E11.5** The Defence Organisation has clear mechanisms in place to enable all people to raise feedback on its Environmental management policies and practices, anonymously where needed.

Documents often associated with this element:

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

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

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> <li>There is no evidence of a stakeholder management system.</li> </ul>	<ul style="list-style-type: none"> <li>There are some mechanisms in place to identify internal and external stakeholders.</li> <li>Mechanisms are rarely applied to identify stakeholders' roles in Environmental matters.</li> </ul>	<ul style="list-style-type: none"> <li>The Defence Organisation has mechanisms in place to identify its internal and external stakeholders.</li> <li>Mechanisms are regularly applied to identify stakeholders' roles in Environmental matters.</li> </ul>	<ul style="list-style-type: none"> <li>The Defence Organisation has mechanisms in place to identify its internal and external stakeholders. There is evidence this is used to build a strong understanding of its stakeholders and their roles in Environmental matters.</li> </ul>

**Expectation 11.2** The Defence Organisation has mechanisms in place to manage and engage with stakeholders; and to consult on Environmental matters, including with the Environmental Regulators, OGDs, suppliers, contractors and others affected by the organisation’s activities.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> <li>• The Defence Organisation does not have mechanisms in place to manage and engage with stakeholders regarding consultation of Environmental matters.</li> <li>• Environmental information is not communicated with other key parties (such as suppliers and contractors).</li> </ul>	<ul style="list-style-type: none"> <li>• The Defence Organisation has mechanisms in place to consult with stakeholders regarding Environmental matters, but this is typically one-way communication.</li> </ul>	<ul style="list-style-type: none"> <li>• The Defence Organisation has mechanisms for two-way communication on Environmental matters with its stakeholders resulting in a collaborative and proactive partnership.</li> </ul>	<ul style="list-style-type: none"> <li>• The Defence Organisation has mechanisms in place to gather feedback from stakeholders and those affected by the Organisation's activities regarding Environmental matters, and stakeholders are enabled to proactively share concerns.</li> <li>• The Defence Organisation actively communicates with individual stakeholders and stakeholder forums and openly considers feedback to improve Environmental Management.</li> </ul>

**Expectation 11.3** The Defence Organisation works with its stakeholders to build effective working relations to drive continual improvement in Environmental Management.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> <li>• The Defence Organisation does not work with stakeholders to build effective working relations or drive continual improvements in Environmental Management.</li> <li>• The Defence Organisation does not have mechanisms to manage feedback.</li> </ul>	<ul style="list-style-type: none"> <li>• The Defence Organisation works with some stakeholders to build effective working relations and drive continual improvements in Environmental Management through documented processes but there are significant weaknesses in implementing Environmental Management processes across the organisation.</li> <li>• The Defence Organisation has mechanisms to manage feedback, however feedback is not acted upon.</li> </ul>	<ul style="list-style-type: none"> <li>• The Defence Organisation works with most but not all stakeholders to build effective working relations and drives continual improvements in Environmental Management through documented processes.</li> <li>• The Defence Organisation has mechanisms to manage feedback and they are regularly acted upon.</li> </ul>	<ul style="list-style-type: none"> <li>• The Defence Organisation works with all stakeholders to build effective working relations and drives continual improvements in Environmental Management through documented processes.</li> <li>• The Defence Organisation routinely consults with stakeholders, jointly sharing Environmental Management challenges, and working collaboratively to resolve and implement corrective actions.</li> <li>• The Defence Organisation seeks feedback from its stakeholders and takes action, including addressing concerns and grievances to allow them to resolve matters before they are realised.</li> </ul>

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

Unsatisfactory	Limited	Moderate	Substantial
The Defence Organisation has no mechanisms in place to allow its people, contractors, and the supply chain to easily access up to date Environmental information.	The Defence Organisation has a mechanism in place to allow its people, contractors, and the supply chain to easily access Environmental information, but the information is not up to date, is incorrect or hard to access.	Mechanisms are in place to provide access to Environmental information. The information is frequently reviewed and updated.	Mechanisms are in place to provide easy access to Environmental information. Systematic updates to information are undertaken and proactively shared to all stakeholders, making them aware of the changes made.

**Expectation 11.5** The Defence Organisation has clear mechanisms in place to enable all people to raise feedback on its Environmental Management policies and practices, anonymously where needed.

Unsatisfactory	Limited	Moderate	Substantial
<ul style="list-style-type: none"> <li>There are no mechanisms in place to enable people to raise feedback on its Environmental Management policies and practices either directly or anonymously.</li> </ul>	<ul style="list-style-type: none"> <li>Limited mechanisms are in place to raise feedback, however feedback is not considered or acted upon.</li> </ul>	<ul style="list-style-type: none"> <li>The Defence Organisation has mechanisms in place for some people to be able to raise feedback on policies and practices, anonymously where desired.</li> <li>Feedback is often considered or acted upon.</li> </ul>	<ul style="list-style-type: none"> <li>People can easily raise feedback on policies and practices, anonymously where desired or required.</li> <li>There is evidence that the Defence Organisation takes active steps to adjust policies and practices in response and communicate changes to those impacted.</li> </ul>