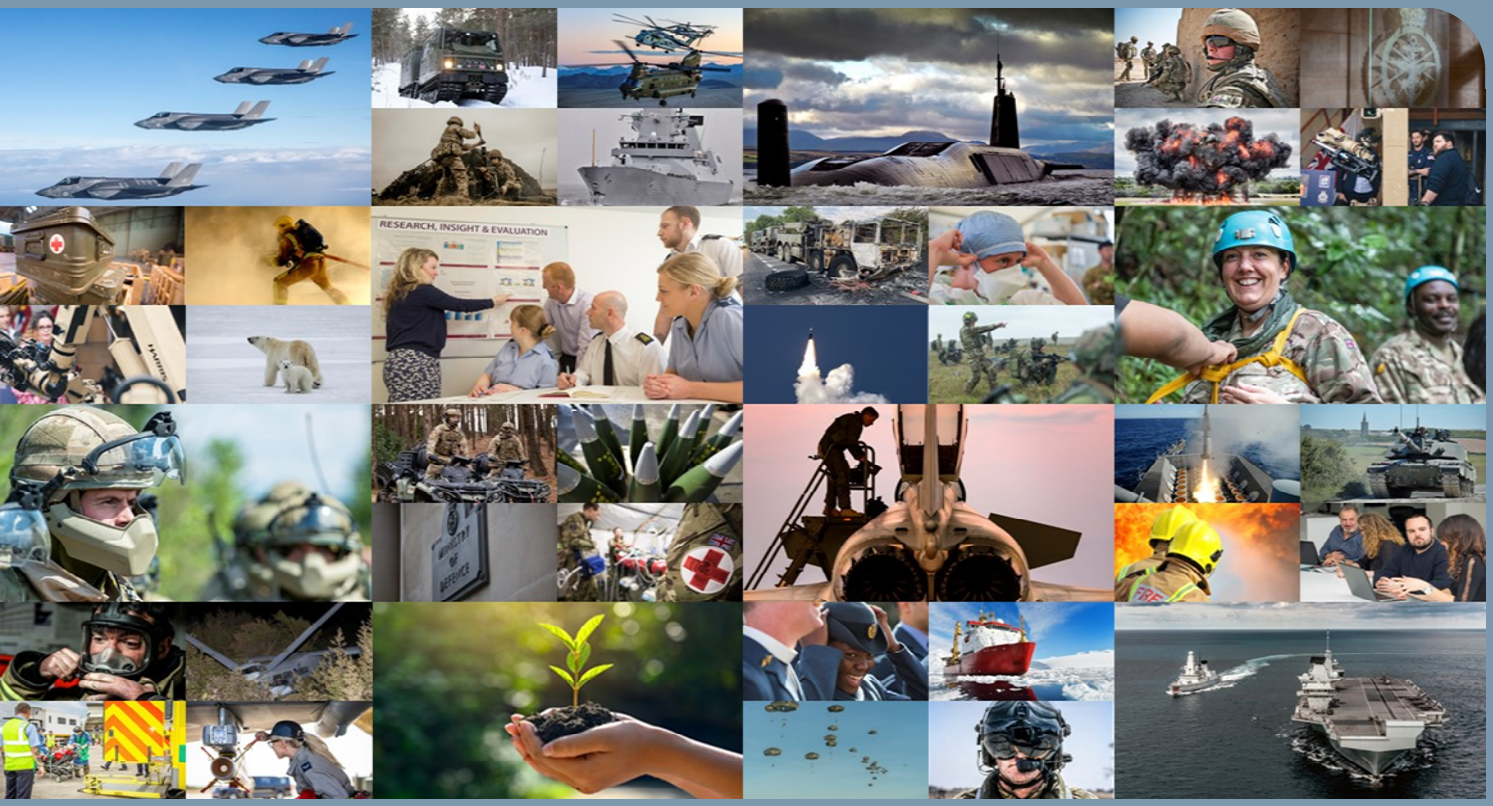
Defence
Safety Authority

Annual Assurance Report

April 2023 to March 2024



This publication is available at https://www.gov.uk/search/all
Any enquiries regarding this publication should be sent to us at:
DSA-HQ-GroupMailbox@mod.gov.uk

Contents

Introduction

The DSA was established by a Charter issued by the Secretary of State (SofS) for Defence empowering it as an independent regulator and investigator for Health, Safety and Environmental Protection (HS&EP) in Defence. It sets and enforces Defence Regulations for HS&EP, and supports the MOD by providing independent, evidence-based HS&EP assurance and accident investigations.

This is the DSA's tenth Annual Assurance Report (AAR), which covers the period 1 April 2023 to 31 March 2024. It provides the SofS for Defence with independent assurance that Defence's policy for HS&EP is being adequately promoted and implemented. This year I have significantly reduced the size of the report by combining the Domain and Defence organisation sections allowing us to focus on key areas.

I am pleased to report a significant reduction in fatalities for this reporting period and I know that the completion of the DSA's investigations into these tragic incidents will go further to mitigate future risks. In response to the nine safety related deaths in 22/23, the DSA has made multiple recommendations based on the findings of the Service Inquiries. These will undoubtedly lead to safer outcomes across Defence.

I have seen improvement across the majority of the Defence organisations. The positive safety culture identified last year has translated well across the array of safety management systems, which was reflected in the collective assessments from our regulators. Conversely, for the first time in a while, we have also seen a decline in assurance levels in two Defence organisations. Recognising that some challenges may stem from a lack of resources, it is imperative for Defence to acknowledge this as a collective issue that requires support from the highest levels and that these issues must be addressed urgently. While the positive safety culture continues to thrive, this needs to be replicated across EP where the systems are still immature.

Air Marshal Steve Shell CB OBE MA RAF
Director General
Defence Safety Authority

19 December 2024

Section 1 – Executive Summary

Introduction

The Defence Safety Authority (DSA) Annual Assurance Report (AAR) provides the Secretary of State for Defence with independent assurance of compliance with the Health, Safety and Environment Policy Statement, including Defence Policy and Defence Regulations. The AAR is compiled using a range of information sources, including regulator reports, contributions from Head Office and all Defence organisations. This report provides assurance levels for each of the Defence organisations as well as providing the department with a benchmark against which to measure progress, understand trends and identify Health Safety and Environmental Protection (HS&EP) issues that need to be addressed.

Overall, Defence's compliance across the regulatory domains has remained broadly static, with the exception being the fire regulatory domain where both fire and rescue services, and fire safety management have improved to **SUBSTANTIAL** assurance.

Performance and Governance of Health, Safety & Environmental Protection in Defence (Section 2)

Governance of HS&EP in Defence

Numerous issues within the governance of HS&EP across Defence need addressing. Leadership roles are unclear, with 2PUS identified as the senior official responsible for HS&EP, yet PUS retains some responsibilities, leading to confusion. The Defence Safety and Environmental Committee (DSEC) suffers from poor attendance, agendas mainly driven by Head Office, and administrative problems, while the Defence Board has not effectively discussed safety or EP issues, leading to confusion about the effectiveness of the Defence Audit and Risk Assurance Committee's (DARAC) role in safety. Despite CEOs and Senior Duty Holders (SDHs) showing commitment at the organisational level, risk management processes are suboptimal, with a conflation of risk to life with corporate risks which may challenge extant and effective duty holding constructs. The Directorate of Defence Safety (DDS) and Directorate of Climate Change and Environment (D CCE) have made progress, but resourcing constraints and a lack of cohesion hinder their effectiveness.

Audit, Investigation and Enforcement

During reporting year 1 April 2023 to 31 March 2024, there were three safety-related fatalities, a significant decrease from the nine fatalities of the previous reporting year; two fatalities are subject to open Service Inquiries (SIs) and one to an open Non-statutory Inquiry (NSI). As a matter of law, Defence is required to investigate the death of a person subject to Service law.

An NSI is a discretionary investigation into any safety-related occurrence in which Defence feels anything of consequence may be learned and which may prevent recurrence.

In 2023/24, the DSA convened four SIs and four NSIs with one NSI being re-convened as an SI and two NSIs that were suspended during the 2022/23 period were re-convened. Eight SIs were finalised during the reporting period, either informed by Ministerial submission or published on Gov.uk; these included the loss of an F-35 Lightning aircraft from HMS QUEEN ELIZABETH, the death of a Royal Air Force parachute instructor at RAF Weston-on-the-Green and the death of a soldier from 23 Parachute Engineer Regiment at MOD Woodbridge. The DSA also completed five NSIs. An investigation was also completed jointly with the French State Aviation Accident Investigation Bureau.

Internal enforcement action can be issued by Defence regulators when responding to a significant non-compliance or hazard which, if left unaddressed, could impact upon safety, cause environmental damage, or place personnel and operational capability at risk. There were 41 new enforcements issued by the DSA during the period (April 2023 – March 2024) and 39 enforcements were closed, giving a net increase of two. This brings the total number of open DSA enforcements at year end to 50, of which Army (10; 20%), Navy Command (9; 18%) and UKStratCom (15; 30%) held the majority. A significant proportion of the enforcements were related to infrastructure maintenance issues associated with fuel and gas installations.

In addition to the DSA's Third Line of Defence activity, external inspections are provided by independent regulators, such as the Health and Safety Executive, Environment Agency and Office for Nuclear Regulation, as well as other internal departmental auditors such as Government Internal Audit Agency (GIAA). This year the Health and Safety Executive issued two Notices of Contravention. This is a significant decrease compared to the previous reporting period. Responses to these Notices are led by individual Defence organisations and overseen by DDS.

Defence Organisation Health, Safety and Environmental Protection Assurance (Section 3)

This section is informed by a variety of inputs which enable a holistic assessment of Defence organisations' level of HS&EP assurance; information from the DSA and Head Office augment self-assessments from across the Defence organisations. The overall assurance assessments for safety and EP for each Defence organisation are shown below in Table 1-1. The levels of assurance are categorised as: Full (F), Substantial (S), Limited (L) , No Assurance (N) or Not Assessed (N/A).

Defence org	Air Command	Navy Command	Army	Strategic Command	Defence Equipment & Support	Defence Infrastructure Organisation	Defence Science and Technology Laboratory	Ministry of Defence Police	UK Hydrographic Office	Oil and Pipelines agency	Defence Safety Authority	Head Office	Defence Business Services	DNO
Safety	S	L	S	L	L	L	L	S	S	S	S	L	S	Reported Separately on secret
EP	L	L	L	L	L	L	L	L	L	L	N/A	N/A	L	

Table 1-1 – HS&EP assurance assessment of Defence Organisations

The Defence organisations' overall safety assessment levels remain consistent with the only changes being DE&S and Navy, both of which have declined from **SUBSTANTIAL** to **LIMITED** assurance. These decreases are primarily due to the increase in demand on the Defence organisations and not enough resource, including platforms, people, or finance. All Defence organisations report similar challenges which constrain their ability to progress to the next overall assurance level.

The DSA assesses all Defence organisations at **LIMITED** assurance for EP due to the immaturity of the reporting from the DSA and some Defence organisations who are still adjusting to the Joint Service Publication (JSP) 816 reporting requirements. This is the first assessment for EP and it should be regarded as an initial assessment with low confidence when aligned to the Defence Environmental Management System (EMS) framework in JSP 816. More data and evidence are required to provide a more comprehensive assessment.

Defence Health, Safety and Environmental Protection Themes (Section 4)

It should be noted that many of the themes identified in this reporting year have been enduring for many years and previously there was little evidence of ownership, positive action or improvement within Defence. However, 2PUS has recently commissioned a review of enduring themes and Director Defence Safety is developing an action plan. For this reporting period the main themes that have been identified are: Increase tempo of activity, Suitably Qualified and Experienced Personnel (SQEP), environmental protection culture, infrastructure safety, accountabilities, innovation trials and experimentation and digital data and exploitation.

Section 2 – Performance and Governance of Health, Safety & Environmental Protection in Defence

2.0 – Section Scope

This section provides an overview of HS&EP performance and governance in Defence during the period 1 April 2023 to 31 March 2024. It covers Defence's governance of HS&EP, safety and EP performance, significant inquiries conducted by the DSA and HS&EP related enforcement action taken by external regulators.

2.1 – Governance of Health, Safety and Environmental Protection (HS&EP) in Defence

Leadership

The current SofS' HS&E in Defence Policy Statement[1] [Health, Safety and Environment in Defence Policy Statement by the Secretary of State for Defence] states that 2PUS is '*the Department's most senior official for HS&EP'* aligning with their role as the Chair of the DSEC. PUS was previously responsible for safety until the creation of the new 2PUS role but the handover of all safety responsibilities has not been completed – it needs to be tidied up.

For example, PUS sends letters of delegation to the TLB owners for finance, but in an annex they also appoint safety responsibilities (for Senior Duty Holding). A review to ensure coherence should be facilitated by 2PUS on behalf of the SofS. Furthermore, safety risk and assurance is currently staffed through the DARAC, which is a PUS owned forum optimised for and focused on corporate risk, not risk to life activities. A review would help to clarify HS&EP leadership roles and responsibilities at the top of the department.

At the TLB level, safety culture is led well from the top with senior leaders engaging fully with their H&S responsibilities. All TLBs are demonstrating an improving safety culture, with the Army showing a particularly significant improvement. It is clear that CGS and DCGS have led the tone from the top. We would like to see an appropriate environment culture developed across Defence.

Organisational Arrangements

DSEC. As a sub-committee of the Defence Board, the 4* DSEC is the principal forum responsible for HS&EP matters. There are a number of issues that require attention; whilst the increased focus on environmental issues is positive, there remain some areas for improvement – specifically attendance, content and administration. These are not new and have been mentioned in previous DSA AARs. Firstly, attendance has been poor; the maximum number of 4* Chiefs in a single DSEC meeting was two. Secondly, the content of recent DSECs has been largely driven by Head Office rather than the TLBs – DDS, CCE and the DSA were responsible for 70%+ of the DSEC agenda items. The more beneficial discussions occur when TLBs share risks that have pan-Defence or cross cutting impacts or where mitigations cannot be managed to an ALARP or tolerable level. Finally, administration of the DSEC has been sub-optimal. Papers are released on average 2-3 clear working days before the meeting which prevents the staff from briefing their principals in a timely manner, stifling the potential for valuable discussion. This is exacerbated by the fact that DSEC packs average over 120 pages each. In addition, the minutes have not always accurately captured the comments and challenges made during the discussions.

Defence Board. The Defence Board is chaired by the SofS and is responsible for top level management of the MOD, including risk. As a sub-committee, the DSEC should, in theory, elevate HS&EP risks and issues direct to the Defence Board but this rarely happens. In the reporting year, the Defence Board did not discuss HS&EP issues or risks in-committee. The only HS&EP related paper that was elevated from the DSEC to the Defence Board in the last 12 months was the DSA AAR 22/23. When it was eventually shared as an out-of-committee paper with the Defence Board, nearly 12 months after it was written due to staffing delays external to the DSA, there was no response and only one comment which came from a NED. It remains unpublished at the time of writing the AAR for 23/24. Whilst 2PUS has been briefed on the enduring themes identified by consecutive DSA AARs, only limited progress has been made to address them. Furthermore, the inclusion of ExCo as a forum that sits between the DSEC and Defence Board has created some confusion that needs clarification.

Risk Management and Reporting

Through the Duty Holding construct, where Defence considers that normal arrangements for managing safety risk may be inadequate, Senior Duty Holders (SDHs) are made accountable to the SofS for risk management ensuring risk to harm and risk to life activities are mitigated to As Low as Reasonably Practicable (ALARP) and tolerable. This process is mature within most Defence organisations however, Head Office as a newly formed TLB has not yet applied a duty holding construct. The recent DSTL explosive incident demonstrated that the CEO did not have an effective system of escalating risks above their level. Head Office TLB should consider adopting a Duty Holding construct to bring it in line with the other TLBs.

The draft DRA-led progress on the Principal Risk Framework is a positive step forward, but the current work appears to conflate processes intended for corporate risk management with those designed for safety. Aggregating several risk to life activities into a single principal risk may result in an unquantifiable risk, that is more difficult to manage, with accountabilities that are less clear. Furthermore, this conflation of corporate and safety risks has led to a skewed mechanism where the Defence Audit & Risk Assurance Committee (DARAC) currently maintains a role in reviewing safety risk and safety assurance. The DARAC has not successfully

reviewed, commented on, or presented any[2] HS&EP risks to the Defence Board in the past 12 months. With the exception of PUS/2PUS, none of the DARAC members have HS&EP SQEP – the board is focused on corporate risk. The DARAC chair and Chief Risk Officer (CRO) should review the role of the DARAC in the management of HS&EP and assurance to provide clarity on its role.

Furthermore, the DSEC may want to consider its role in risk management, possibly requesting that the TLB's highest HS&EP risks and mitigations are routinely briefed at the DSEC. The sharing of best practice may highlight unknown risks in other TLBs and identify pan-Defence mitigation measures. It may also clarify how a TLB can request additional support (e.g. more resource) from Defence to mitigate a TLB specific risk where it is not deemed to be ALARP and tolerable.

HS&EP Functional Progress

The DDS and D CCE AARs have demonstrated progress in their areas this year, for which they should be commended. Despite both assessing assurance levels as LIMITED, only DDS has a pathway to SUBSTANTIAL assurance. D CCE lacks the capacity to determine a pathway to SUBSTANTIAL at this time. Ensuring continued focus on resourcing this work will be important to maintain a positive trajectory.

Throughout the period, the DSA and its respective safety and environment functional partners have continued to work through some significant governance challenges. These challenges have ranged from assurance against policy, enforcement practices, roles and responsibilities, the wider responsibility of the DSA beyond DDS and D CCE, risk and assurance planning. As a result, there is now greater clarity and a constructive dialogue continues to make progress, strengthening the operating model, reducing overlap and becoming mutually supporting.

Policy. Amongst others, DDS has published JSP 815 (Defence Safety Management System), JSP 376 (Defence Acquisition Safety Policy) and reviewed numerous other policy publications. This volume of policy change was significant but reduced their capacity to advance other work strands. D CCE has updated some elements of JSP 418, (Management of EP in Defence), although this still remains out of date for many areas, and JSP 392 (Management of Radiation Protection in Defence); and published JSP 816 (Defence Environmental System Framework). Whilst this is a positive step forwards, there is still much to do but little resource to do it.

Operating Models. DDS has recently updated the Defence Safety Function Operating Model. Whilst the update is welcome, it does not fully address the risk management issues raised in section 2.1 above. The D CCE Environment Operating Model (EOM) is being created following the transfer of EP to D CCE but is currently behind schedule. The EOM will explain how EP operates within the MOD and highlight the key roles and responsibilities. D CCE is aiming to publish the EOM in Q2 24/25.

Safety and Environment (S&E) Profession. Both DDS and D CCE have continued to build the network for S&E Professionals, utilising communications, webinars and accessible document portals available to all. The S&E Profession completed its first

annual professional document review of the Competency Framework, Our Offer, Career Pathways & Training Catalogue to reflect the transition of Environmental Protection responsibilities to Director CC&E.

Environmental Protection (**EP) awareness**. During the reporting year there have been some improvements in EP awareness within Defence organisations. However, EP discussions are still not consistently fully established at senior levels, overshadowed by safety and climate concerns. There is also a lack of uniform understanding of EP, possibly due to its association with climate change and sustainability, which requires clearer definitions, boundaries, and communication. This has resulted in a lack of EP data and evidence to inform assurance levels across Defence.

2.2 – Safety Performance

Safety-related Fatalities

There have been three safety-related fatalities during the reporting period, as outlined below; this was a significant decrease from the previous period. Despite this, both the three-year average and the five-year average fatality rate per 100k personnel continued to trend upwards (Figure 2-1).

- **16 September 2023** – Fatality of an off-duty reservist soldier in a motorcycle accident at RAF Odiham (NSI).

- **20 September 2023** – Fatality of a soldier in a vehicle accident in the vicinity of Sennybridge Training Area (SI).

- **21 September 2023** – Fatality of a soldier during a military training exercise on the Driffield Training Area (SI).

Details of the fatalities in 23/24 and other incidents of note, can be found in Annex A - Safety-Related Inquiries and Investigations April 2023 – March 2024.

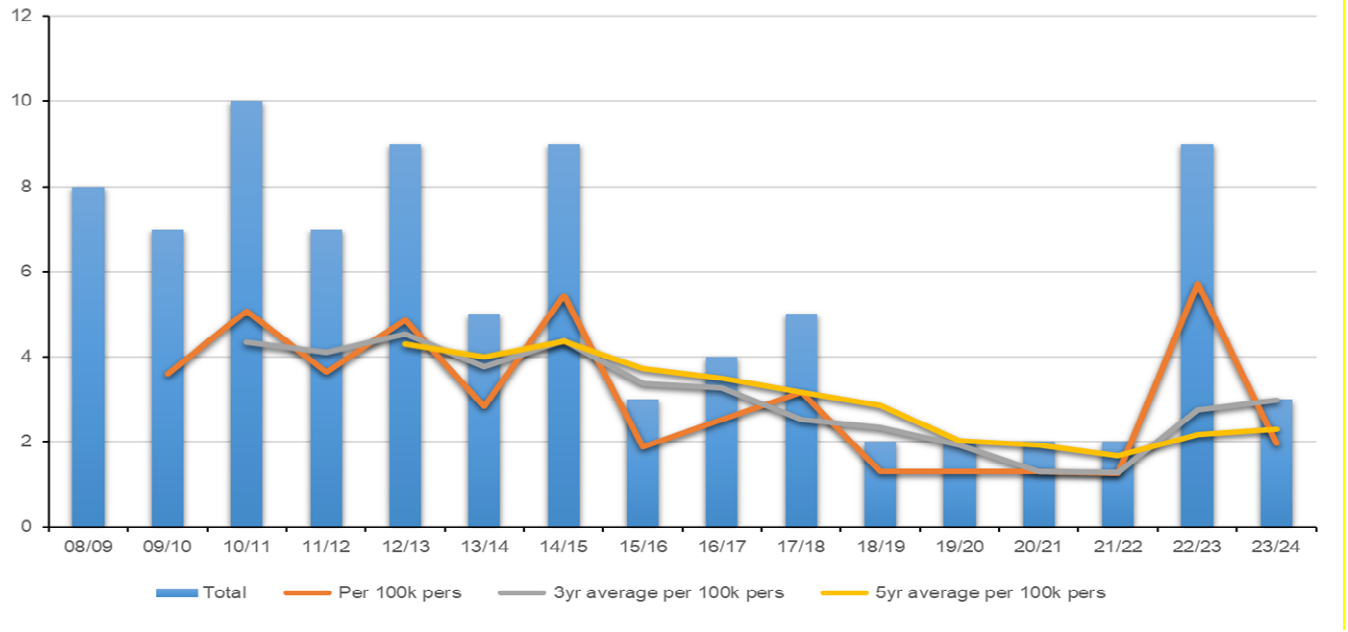


Figure 2-1 – Armed Forces Safety-related Fatalities[3]

Service Inquiries, Non-statutory Inquiries, and Recommendations

The Defence Accident Investigation Branch (DAIB) provides Defence with professional accident investigation capability, maintaining teams of trained accident investigators at very high readiness to deploy anywhere in the world in response to an incident. The DAIB conducts independent, impartial and expert no-blame investigations of accidents, serious incidents and near misses across all domains by supporting DSA SIs and conducting DSA NSIs. Together these investigations ensure that causal factors are identified and targeted recommendations made, which are tracked to closure, to reduce the likelihood of reoccurrence, enhance safety in Defence, protect the environment, and preserve operational capability.

In 2023/24, the DSA convened eight investigations, with sixteen in progress at the end of the period. In addition, two NSIs (Noise Induced Hearing Loss and A11 road traffic accident), temporarily suspended by DG DSA during the previous period, were re-started. Thirteen investigations were completed with 389 recommendations generated as a result; a total of 84 recommendations were closed.

At the end of 2023/24, 543 recommendations from all investigations remained open. This is compared with 268 at the end of 2022/23 period and is the corollary of the significant increase in investigation activity during 2022 and 2023.

The DG DSA has also engaged early across Defence to issue Urgent Safety Advice to hasten changes and to avoid repetition of factors that may have contributed to an incident.

[3] Fatality figures are drawn from MOD, *MOD Health and Safety Statistics: Annual Summary & Trends Over Time 2016/17-2022/23*, 2023. Full-time Armed Forces comprise all UK Regulars and, Gurkhas and Full-Time Reserve Service.

Service Inquiry Publications

The DSA published seven SI reports in 2023/24 on the following investigations:

- **Service Inquiry into the fatality of a Royal Air Force (RAF) parachute instructor at RAF Weston on the Green on 2 September 2021**
    - The SI panel concluded that turbulent wake created by the SP's freefall position and a malformed reserve pilot chute were the causal factors in the incident.
- **Service Inquiry into the loss of F-35B Lightning ZM152 (BK-18)**
    - The SI panel concluded that an intake blank at the front face of the engine compressor during the aircraft launch was the causal factor in the incident.
- **Service Inquiry into the fatal accident involving a Scimitar Fighting Vehicle on Salisbury Plain Training Area on 15 October 2021**
    - The SI panel concluded that immediately before the accident, the gun barrel of the Scimitar was being moved forward (in an anti-clockwise direction), and at the point of collision of the barrel with a tree, was travelling at approximately 20mph causing the turret to rotate. The panel found the position of the gun barrel at the time of the incident to be the causal factor.
- **Service Inquiry into the death of a service person in an accident with a Warrior armoured vehicle on Salisbury Plain Training Area on 21 June 2022**
    - The panel concluded that the Warrior's non-functioning rear door alarm and the vehicle reversing before the SP had moved clear were causal factors in the incident.
- **Service Inquiry into the death of a Royal Air Force (RAF) service person in a motorcycle accident at Cadwell Park race circuit on Friday 27 May 2022**
    - The SI panel determined that it was highly likely that the causal factor in this incident was the SP's position on the motorcycle whilst navigating a corner, causing them to move to the outside of the racetrack and precipitating the accident.
- **Service Inquiry into the death of a Royal Air Force (RAF) service person and serious injuries during British Services Mountaineering Expedition, Pakistan July 2022**
    - The SI panel was unable to positively determine what caused the SP's death. However, it was highly probable that a combination of a number of contributory factors including: fatigue; reduction of the fatigue risk management controls; lack of supplementary oxygen; the way the SP descended the mountain and not communicating their intention to descend alone; and the inadequate level of group management, supervision and the failure of the agreed risk controls, led to the accident.

  - The SI panel also concluded that there were a number of causal factors that contributed to the serious injury of two SPs that cumulatively introduced a significant delay to progress and resulted in them remaining in an area of increased rockfall risk for a longer period of time.

- **Service Inquiry into the death of a soldier from 23 Parachute Engineer Regiment at MOD Woodbridge, July 2022**

  - The SI panel identified numerous contributory factors that led to the SP's collapse and subsequent death. These included: a lack of assessment of SP's fitness in accordance with policy; lack of training plan; confusion about who was in charge of the evolution; lack of awareness of SP's status as a new arrival or their abilities; symptoms not immediately diagnosed as heat stroke or acted upon; confusion over medical capabilities and differing guidance on heatstroke treatment leading to a delay in active cooling.

Climatic Injury

The 22/23 AAR highlighted exertional collapse as a contributing factor in the increase in safety-related fatalities. Whereas exertional collapse due to heat was the cause of death of a soldier at MOD Woodbridge and the non-fatal collapse of a soldier at Tidworth in 2022, there were no on-duty heat or exertional collapse deaths or serious injuries recorded in 23/24.

There has been little change in the rates of climatic injuries documented in medical records over the last 5 years, with untrained personnel experiencing higher rates of climatic injury compared to trained personnel. Due to limitations with Defence Medical Information Capability Programme (DMICP) it is not possible to identify episodes of care i.e. where an individual may have numerous entries relating to ongoing care or where subsequent climatic incidents have occurred. It is also not possible to positively determine which of the reported incidents were confirmed as resulting from climatic factors.

The absence of on-duty deaths or serious injuries due to climatic injury, particularly heat illness, is an early indicator that changes to policy, and mandatory training and reporting requirements has enhanced awareness of climatic injury across Defence i.e. an increased willingness to positively intervene if climatic injury is suspected. However, suspected climatic incidents are still under reported in H&S systems when compared to the medical record.

Cadet Activity

There was no incidence of a fatality of regular or reserve forces during adventurous training activities in 23/24; however, the serious injury of an Army cadet while mountain biking and the subsequent NSI, highlighted questions regarding policy documentation for the delivery of cadet activities, the potential for errors in interpretation in authorisation of activity, and the overall assurance processes. For this report, Adventurous Training Safety Regulations relate to licensing centres that provide AT for UK Armed Forces and Cadets. AT is provided through the Joint Service Adventurous Training (JSAT) Scheme. Cadets fall outside this scheme and should be delivering AT under National Governing Body (NGB) qualifications and guidelines.

A NSI into heat-related accidents within the MOD undertaken in 2022[4] found “a common theme of lack of application of the mitigations required to prevent [*heat illness in cadets*], and the dissemination of information designed to prevent it”. Similarly, “the number of potential heat-related accidents being reported indicate that [*heat illness prevention*] may not be taken seriously or is difficult to manage as a hazard” as there is no heat illness prevention direction for cadets and young people contained in policy, JSP 375 Ch41 is not written for young persons in the cadet forces and the work/rest tables in Ch41 only apply to those aged 18 and over.

From these examples, it can be deduced that the policy governance, risk assessment and management, and assurance processes relating to the delivery of cadet activities may be an area of safety concern that warrants further investigation.

High Risk Sport and Adventurous Training

Since Sep 21 the death or serious injury of 9 Service Persons (SP) resulting from participation in High Risk Sport (HRS) or Adventurous Training (AT) activities have been investigated or are currently under investigation via SI or NSI. Despite the varied nature of the activities and although not directly causing or contributing to the incident, all SI that have completed, have reported shortfalls or inconsistencies in service policy, regulation, governance and assurance. These can be broadly categorised as follows; absence of or inadequate service AT or HRS policy and regulation; lack of or inconsistencies in the application of service AT or HRS policy and regulation between sS and/or National Governing Bodies (NGB); absence of or inadequate governance/duty holding structure for AT or HRS; absence of or inadequate assurance mechanism for AT or HRS. Of the 4 SIs and NSIs that remain under investigation, preliminary findings indicate that similar shortfalls in policy, regulation, governance and assurance exist.

Health, Safety and Environmental Protection Reporting

Defence initiatives are trying to improve the collection and recording of safety and environmental related incidents. MySafety (previously known as Defence Unified Reporting and Lessons System (DURALS)) continues to be developed by Defence Digital supported by the Directorate of Defence Safety as the sponsor. It was endorsed by DSEC members as the pan-Defence safety and environment reporting system in 2023. However, this was caveated with the fact that although Front Line Commands (FLCs) supported the adoption of MySafety, some of them would not move across to the new system until it was proven to be as effective as some current single Service systems. This will ensure a smooth transition and avoid risk in this transformation project. This has made the adoption of MySafety much slower among the majority of Defence organisations with only Army and Strategic Command fully implementing the new reporting tool. This hinders the Department’s ability to learn as an organisation, which is evidenced in its inability to track previous lessons identified. Four years on from reporting the Unified Reporting Tool initiative to the House of Commons Defence Committee and recognising Defence needs to be better at exploiting its safety and environmental data, the anticipated improvements from lessons and insights has not been observed at Departmental level.

Compensation claims[5] costs, and volume, have steadily increased over the last three reporting periods (2020/2021[6], 2021/2022, 2022/2023) rising from £124M to £160M. Not all claims are safety or environment related but Noise Induced Hearing Loss, non-freezing cold injury and asbestos make up most claims. Claims may be made several months or years after incidents occurring, which may or may not have been reported at the incident occurrence.

2.3 – Enforcement Action

External Enforcement Action

In addition to the DSA's Third Line of Defence activity, external inspections are provided by independent regulators, such as the Health and Safety Executive, Environment Agency and Office for Nuclear Regulation, as well as other Cross Government departmental auditors such as Government Internal Audit Agency (GIAA).

The Health and Safety Executive cannot issue improvement or prohibition notices to the MOD or its Agencies, nor apply enforcement action, due to their status as Crown Bodies. However, they are permitted to issue Crown Notices on Crown Bodies. These are administrative notices which, in practice, have the same effect as improvement or prohibition notices. Whilst the Health and Safety Executive cannot prosecute the MOD or its Agencies in a criminal court, it can impose Crown Censures – administrative sanctions that are considered very serious by Crown Bodies.

This year the Health and Safety Executive issued two Notices of Contravention (different from Crown Censures). This is a significant decrease compared to the previous reporting period. Responses to these Notices are led by individual Defence organisations and overseen by the Directorate of Defence Safety (DDS), there is still no detailed pan-Defence analysis completed across the HS&EP Function on external enforcement actions to understand generic themes; more extensive thematic analysis of enforcements would be expected to significantly improve the development and implementation of recommendations across Defence. Digital enhancements would improve data capture and enhance subsequent analysis.

DSA Enforcement - Internal to Defence

Through regulatory activity and investigations, the DSA conducts enforcement activity to ensure that those responsible:

- Act to immediately deal with serious risks.
- Achieve sustained compliance with Defence regulations.
- Are held to account for possible failing to effectively fulfil their HS&EP duties.

Enforcement action should be proportionate to the risk of harm and the urgency required to take corrective action. Enforcement action is utilised by statutory and Defence regulators where they find significant non-compliance or a hazard which, if left unaddressed, could impact upon safety, cause environmental damage, or place personnel and operational capability at risk. Conclusions from analysis of the DSA enforcement data informs the domain and organisational assurance

assessments and provides evidence towards cross regulatory safety and environment themes. It is also used by the Defence Themed Assurance Branch as evidence for further investigation.

There were 48 open DSA enforcements at the beginning of the year; 41 new enforcements were issued by the DSA during the period (April 2023 – March 2024) and 39 enforcements were closed, giving a net increase of two. This brings the total number of open DSA enforcements at year end to 50, of which Army (10; 20%), Navy Command (9; 18%) and UKStratCom (15; 30%) held the majority. A significant proportion of the enforcements were related to infrastructure issues with maintenance related to fuel and gas installations. The three oldest enforcements, more than 5 years old, all relate to fuel and gas infrastructure issues with the involvement of multiple agencies and contractors contributing to delays. A further 15 are more than 12 months old, the majority of these relate to safety governance and infrastructure issues.

Section 3 – Defence Organisation Health, Safety and Environmental Protection Assurance

3.0 – Scope

The DSA Annual Assurance Report (AAR) provides the Secretary of State with an independent view of the progress that each Defence organisation has made towards the target of SUBSTANTIAL levels of Health, Safety and Environmental Protection (HS&EP) assurance, notwithstanding the ultimate headmark of FULL assurance. This section outlines the level of assurance for HS&EP for each Defence organisation (see Table 3-1),and includes the key supporting observations. The analysis is based on a range of sources: information is taken from the DSA, the Directorate of Defence Safety (DDS), the Directorate of Climate Change and the Environment (D CCE) and self-assessments from across the Defence organisations.

The information presented within this section is not exhaustive and more detail can be found within the Regulators' individual AARs, which have had appropriate engagement and circulation to all stakeholders, and the Defence organisations' self-assessments through their respective HS&EP leads and committees.

Defence org	Air Command	Navy Command	Army	Strategic Command	Defence Equipment & Support	Defence Infrastructure Organisation	Defence Science and Technology Laboratory	Ministry of Defence Police	UK Hydrographic Office	Oil and Pipelines agency	Defence Safety Authority	Head Office	Defence Business Services	DNO
Safety	S	L	S	L	L	L	L	S	S	S	S	L	S	Reported Separately on secret
EP	L	L	L	L	L	L	L	L	L	L	N/A	N/A	L	

Table 3-1 – HS&EP assurance assessment of Defence organisations

The levels of assurance are categorised as: Full (F), Substantial (S), Limited (L), No Assurance (N) or Not Assessed (N/A) (see Figure 3-1 for definitions and colour-coding used in the diagrams).

Figure 3-1 – Defence HS&EP Assurance Levels

3.1 – Navy Command – LIMITED Assurance for Safety and LIMITED Assurance for Environmental Protection

Safety

Navy Command's assurance level for safety has declined from SUBSTANTIAL to LIMITED assurance. This is primarily because of high operational demand and not enough resource, including platforms, people, and finance, resulting in a lack of reduced confidence in the Navy's ability to operate safely and an increased reliance on 'failing safe' with consequential unplanned impact on capability. With regards to safety assurance, the following key issues have been identified:

Workforce. There are significant challenges with the Navy's military and civilian workforce, which impacts the organisation's ability to maintain SQEP. The shortage of specific military specialisations has led to unprecedented levels of staff augmentation across all directorates, which has strained the system to the point where the level of assurance within the first and second lines of Defence is currently suffering due to workforce shortages.

Risk. The Defence Maritime Regulator (DMR) has reported that Navy Command has not evidenced a full understanding of the cumulative risk across the fleet. Previously, risk levels and safety management processes were deemed adequate, but increased operational demands, resource shortages, and recent incidents indicate this is no longer the case. Submarine risk management remains the top strategic issue, with key concerns including Director Submarines not having a Safety and Environment Management Plan (SEMP), increased maintenance shortfalls, non-adherence to risk management policies, unauthorised design changes, and poor documentation interfaces between Navy Command and contractors. These factors suggest an inadequate understanding of cumulative risk, hampering informed decision-making. Furthermore, competency in risk assessment procedures remains a major issue in land based areas due to insufficient availability of training. This erosion of in-house risk assessment and Control of Substances Hazardous to Health (COSHH) training is impairing the Navy's ability to control workplace hazards effectively.

Assurance. DMR issued an Improvement Notice to Surface Flotilla (SURFLOT) and Director Force Generation (Dir FGEN) on surface fleet assurance, highlighting resource and crewing issues, maintenance shortfalls, operational envelope concerns, and failures in safety and engineering standards. Recent incidents involving HMS CHIDDINGFOLD, HMS BANGOR, and HMS FORTH underline these problems. Director Develop's area lacks capacity to undertake its own safe-to-operate assurance activity, causing delays and necessitating additional work from the Platform Authority. Afloat Support (AFSUP) (AFSUP Includes organisations and agencies which combined with the Royal Fleet Auxiliary, provide logistical technical support to the fleet) faces significant resource challenges, failing to meet safety and environmental protection standards since 2021. While joint efforts between the two organisations are underway, slow progress and insufficient resourcing continue to pose risks, with an urgent need for short-term mitigation actions.

Maintenance. The maintenance of equipment is increasingly of concern, especially as many platforms and equipment across all directorates are operating well beyond their initial design parameters. This situation necessitates extra scrutiny and more effective risk management, particularly in the maritime space, while awaiting delayed replacements to be built and brought into service.

Medical. The Royal Fleet Auxiliary (RFA) has undergone a re-audit by the Defence Medical Services Regulator (DMSR) at the end of the reporting year. Formal analysis of the safety systems and full consideration of evidence had not taken place at time of writing; therefore, the RFA remains as having NO ASSURANCE in the medical domain. The Urgent Improvement Notice following the initial inspection has remained in place over this reporting year.

The following positive aspects of the Navy's safety management system (SMS) have been identified:

Design projects. An increasing level of awareness of the need to understand and implement HS&EP requirements from the earliest stages of new design projects has been demonstrated. This is positive given the large number of projects, programme and procurement currently underway in the maritime domain. A positive trend towards the safety management of surface maritime autonomy has been noted, which can start to be characterised as a move towards the integration of autonomous surface vessels as business as usual.

Reporting. Navy Command continues to maintain a positive reporting culture, which is crucial for ongoing improvement and transparency. Efforts are also underway to move over to the Defence Unified Reporting and Lessons System (DURALs), renamed MySafety, which although not yet matching the capabilities of the current Navy system, shows promise for future enhancements.

Assurance. The Defence Medical Safety Regulator (DMSR) has seen evidence of significant and positive change. There is active engagement, collaboration and integration between the Royal Fleet Auxiliary (RFA) and Navy Healthcare. There is evidence of established dedicated resource working alongside Navy Healthcare to focus on governance and assurance in response to the Enforcement Action.

Environmental Protection

Navy has a LIMITED assurance level for Environmental Protection (EP). DSA regulators have recognised positive actions and good awareness towards protecting the environment from Defence activities, but do not have sufficient evidence for a detailed view. The Defence Environmental Protection Regulator (DEPR) highlighted positive areas, which included leadership, accountability and responsibility as demonstrated through senior statements, letters of delegation, risk management and governance for escalating risk. There remain difficulties in delivering EP assurance due to SQEP, resource issues and access to training. Specifically, DMR, as reported in a recent study, has highlighted several weaknesses, such as underreporting for fluorinated gas (FGAS) releases. Aircraft carriers have been assessed to be the largest contributor to FGAS release due to technical issues that have not been fully addressed. Whilst Navy Command has policy mandating accurate reporting, action to address this issue has not been prioritised. In addition, concerns remain regarding the Navy and MOD response to a major pollution event from a MOD historic wreck threatening a foreign shore. Processes for alerting the MOD to developments with a wreck are uncertain, with no set procedures and no clear lines for funding for a full clean-up.

3.2 – Army – SUBSTANTIAL Assurance for Safety and LIMITED Assurance for Environmental Protection

Safety

The Army has maintained a SUBSTANTIAL level of assurance for safety for the second year. Issues with resourcing, including cuts to workforce budgets and some programmes, have prevented improvements in some areas. Key issues identified include:

Infrastructure. Ageing and deteriorating infrastructure poses ongoing concerns, particularly at firing ranges, fuel and gas installations, and as a fire risk in sleeping accommodation.

Risk. Non-standard procurement practices and a lack of clear policy contribute to increased risk exposure. While the Army awaits policy updates, proactive risk management remains crucial to enhance decision-making and operational effectiveness. The Army Medical Service takes a functional approach to risk management utilising dashboards in lieu of risk registers which are held at 2* level, this challenges coherence. A solution to manage compound medical risk across the Army is in development.

Assurance. Compliance with maritime legislation remains at a NO/LIMITED assurance level, and resource constraints hinder rectification despite issuing a Corrective Action Plan. Progress was noted in the land domain that included advancements in safety case management, innovation, and assurance within the second line of Defence. Defence Medical Services workforce pressures manifest throughout the Army Medical Services. The impact is seen at all levels, not least with access to governance and assurance training. The SQEP for undertaking Internal Assurance Reviews (IAR) for Army healthcare (to provide assurance and drive learning) is being developed.

Positive actions and improvements during the period allowed Army to maintain an overall SUBSTANTIAL safety assurance level:

Safety culture. The Army's commitment to safety and governance continues to show positive momentum, with substantial assurance in key areas such as leadership, governance, and cultural development. Building on last year's emphasis on the 'tone from the top,' safety has been integrated into the Army's cultural development programme, evidenced by its inclusion in standing agendas across various meetings and positively reported through regulatory assurance. This is further evidenced through data analysis which indicates that safety incidents are relatively low and decreasing, and that the implementation of a principles-based approach to duty of care is delivering positive results. This is also linked to the good work developing and integrating MySafety, concerns now lie with the transfer of the development of MySafety to Defence Digital where updates and changes have now slowed.

Training. Efforts are underway to ensure that the Army’s safety function is appropriately resourced and has access to professional development pathways, aiming to address gaps and enhance efficiency. The Army remains committed to continuous improvement and proactive risk management strategies. Whilst work is progressing, the Army does not consider the Unit Safety Manager (USM) or Unit Safety Adviser (USA) training fit for purpose, citing outdated content and limited availability. Training issues also exist in fire competence and capability. The relatively new Force Protection (Safety, Health, EP and Fire) Training and Education Delivery package covers practitioner and manager levels, but the Army relies on Defence to make the senior advisor level suitable as soon as possible.

Environmental Protection

The collective Environmental Protection (EP) dataset results in LIMITED assurance, with general views expressed that minimal EP evidence was recognised or specifically identifiable other than arrangements through Heads of Establishment and site-level environmental

management. EP is still too heavily linked with safety and not reported as a stand-alone issue, with just one element of the Environmental Management System (EMS) commented on. The Army acknowledges that EP is only considered at the tactical level with EP not apparent at the organisation level. While the Defence Environmental Protection Regulator (DEPR) highlighted potential strengths in areas such as organisational arrangements and legislation compliance, it has yet to be confirmed whether HS&EP processes are used effectively for EP. Leadership and competence remained unassessed, as it was not clear whether the expectations were met for EP specifically, with shortfalls of EP knowledge at unit level and challenges to get personnel onto appropriate training courses. While there is focus on fuel spill reporting, there is uncertainty that adequate assurance for EP is taking place.

3.3 – Air Command – SUBSTANTIAL Assurance for Safety and LIMITED Assurance for Environmental Protection

Safety

Air Command's overall safety assurance level remains at SUBSTANTIAL, showing little improvement from the previous year and even some decline in areas such as airworthiness and land safety systems. These areas are unlikely to improve until issues with SQEP and task-to-resource alignment are addressed. Overall progress has been significantly limited by continued resource constraints. Key areas identified for safety were:

Safety culture. Inspectors within Air have raised concerns about the lack of demonstration of strong safety leadership and culture. Specific issues include a perceived lack of trust in Air's Just Culture, with personnel feeling pressured to take more risks and sometimes misinterpreting this as an encouragement to cut corners or disregard safety regulations. Additionally, there is a significant lack of understanding and completion of risk assessments, particularly in climatic injury management. Some risk assessments are poorly constructed, with insufficient control measures documented.

SQEP. There are ongoing gaps in safety-related posts within units and the Safety Inspectorate, leading to competency and training issues. The shortage of SQEP across key groups, such as engineers, affects the availability of airframes and equipment necessary for maintaining aircrew, battlespace management, and air traffic control competency levels. Due to limited resources, a matrix-management approach is being taken where several domain Inspectors, who are external to the Safety Centre, are tasked with providing analysis of 2LoD domain assurance activity, even if that activity is not personally directed by them. Insufficient resource levels make it challenging to maintain thorough objectivity and appropriate oversight. Within adventurous training, there is a disparity between the well-resourced and well run Robson Centres (SUBSTANTIAL assurance) and stations, where lack of training and experience means AT is not being run as it should be. (LIMITED to NO ASSURANCE).

Assurance. The Defence Fire Safety Regulator (DFSR) has identified improving levels of compliance across the estate, although there are still areas for improvement, including general fire precautions, emergency routes and exits, maintenance of safety systems, and confidence in the suitability of Fire Risk Assessments (FRAs) remains a work in progress. Safety in the land domain for Air Command is currently assessed as LIMITED due to non-compliances and lack of assurance. Despite some improvements within Fuel & Gas, especially where Air continues to employ the Oil & Pipelines Agency (OPA), issues persist due to a lack of competence, poor maintenance standards, and lack of

assurance within Bulk LPG and lodger units. Significant changes are required to achieve an assurance rating above LIMITED.

Air Command continues to show strong commitment in high-risk domains such as flight safety, explosive safety, and battlespace management. Positive actions also include:

Assurance and reporting. The RAF has a very mature safety reporting culture, as demonstrated by the extensive occurrence reporting. Within adventurous training, stations are starting to address the shortcomings in their Safety Management System (SMS) and are developing their own Safety and Environmental Management Plans (SEMP) for risk-to-life activities. The newly created Land Activity Safety Team (LAST) now provides a limited second line of Defence capability for land activity safety. The governance and assurance processes for the sport domain remain robust, well-documented, and well-resourced. Sport safety assurance is underpinned by a well-developed first and second line of Defence practice, supported by effective real-time tracking and education initiatives.

Environmental Protection

Air Command has LIMITED assurance for Environmental Protection (EP). Identified weaknesses include loss of fuel incidents, lack of funds and competence for military aviation noise contours, and issues with hot fire training and fire-fighting foam storage. While there is a focus on EP at the establishment level, deficiencies were noted in senior governance boards. EP has only recently been added to the agenda and there is a need to include EP in management information and risk reporting. Assurance findings from the Defence Ordnance, Munitions and Explosives (OME) Safety Regulator (DOSR) for Major Accident Control reported SUBSTANTIAL assurance, with evidence of effective scenarios, risk management, and comprehensive documentation from RAF Waddington. Furthermore, DOSR noted that several EP surveys at ranges documented good environmental awareness, understanding in environmental management, and overall communication and engagement. The Defence Environmental Protection Regulator (DEPR) assurance report identified gaps in legislation recorded in Air Command policy.

3.4 – Strategic Command – LIMITED Assurance for Safety and LIMITED Assurance for Environmental Protection

Safety

Strategic Command (UKStratCom) currently holds a LIMITED assurance rating for safety, though significant progress towards SUBSTANTIAL assurance has been made. Achieving this higher level of assurance is constrained by the organisation's complexity and recruitment challenges for specialist staff, a process expected to take 2-3 years. Key areas identified for safety were:

Governance. Specific domains and organisations within UKStratCom, such as the maritime domain and Director Overseas Bases, remain at LIMITED assurance with substantial improvements needed. Defence Primary Healthcare (DPHC) faces persistent challenges in workforce, infrastructure, and medical information systems, which despite mitigations continue to impact patient safety. Land safety domain assurance remains LIMITED, requiring further attention in movement, transport, and land systems. While

progress is evident in some areas, overall assurance improvements are still needed to fully address safety and environmental risks.

Emergency response arrangements. The Defence Maritime Regulator (DMR) has contributed audit evidence this year, with three Improvement Notices issued to Director of Overseas Bases. These relate to poorly understood accountability; lacking suitable and sufficient maritime safety & environmental management arrangements; and not learning lessons. An incident at the Ascension Island refueling facility where no maritime pollution response arrangements were evident had similarities to the previous Cyprus Ocean tanker incident. Evidence of poor accountability and risk management in Bahrain, as well as additional concerns around prevention and management of pollution at British Defence Singapore Support Unit (BDSSU) due to equipment, procedures and exercises not undertaken.

Positive actions and improvements during the period include:

Assurance. Efforts to bolster assurance within the 2nd Line of Defence (2LoD) through support from the single Services are ongoing, with challenges attributable to remote locations and staff turnover. UKStratCom has established an assurance register and monitors compliance through the Army Reporting Management System, ensuring comprehensive coverage and addressing non-compliance. Following a DSA Audit, an action plan was implemented, closing most recommendations and improving HS&EP assurance arrangements with Defence regulators. The UKStratCom Safety Centre has reached full operating capability despite recruitment hurdles.

Environmental Protection

Efforts to improve Environmental Management Systems lag behind the various Safety Management Systems. The DSA collective EP dataset results in limited assurance, however data from Defence Ordnance, Munitions and Explosives (OME) Safety Regulator (DOSR) for Major Accident Control reported overall SUBSTANTIAL assurance for Episkopi, Cyprus and BDSSU Singapore, with only low-level improvements in documentation and evidence required. The Defence Environmental Protection Regulator (DEPR) highlighted areas potentially moving towards SUBSTANTIAL, including leadership as demonstrated through governance mechanisms, performance reports, risk reviews, and assurance. Improvement was required in documenting current relevant legislation and ensuring enough competent staff (at safety team and unit level) to limit the impact on performance.

3.5 – Defence Equipment & Support – LIMITED Assurance for Safety and LIMITED for Environmental Protection

Safety

Defence Equipment and Support (DE&S) has seen a decline in assurance levels from previous reporting and is now at LIMITED assurance for Safety and EP. Despite a mature internal control system, resource limitations have caused significant weaknesses especially within DG Land and Ships area. Key areas identified for safety were:

SQEP. DE&S reports that acquisition safety performance, assessed by DE&S domains (DG Air, DG Land, DG Strategic Enablers, and DG Ships), faces challenges in managing legislation, policy, regulations, guidance, personnel competence, resources, and training. Extraordinary Safety, Health & Environment Committees (SHECs) were convened to manage resource-related risks, with some work halted to protect safety. DG Ships anticipated being unable to assure safe activity beyond July 2024. Consequently, resourcing was reallocated to Ships to recruit suitable SQEP and restore the safety margin. Occupational Health and Safety (OHS) resource limitations are also a concern. DE&S is adapting to resource challenges by reviewing its business approach and reallocating resources to priority outputs. This involves a phased implementation of a new operating model, which assesses new business activities. Under this model, projects lacking sufficient SQEP and financial resources will not advance beyond the starting 'Gateway' phase, thereby providing a back-stop to improve safety and overall deliverability.

Assurance. Effective assurance remains a significant weakness across DE&S, with multiple team structures reporting resourcing gaps. More assurance at 2LoD is required to fully evaluate the efficacy of assurance at 1LoD and address these challenges. There are inconsistencies in assurance training across the 1LoD and 2LoDs for fuels and gas and fire.

Equipment. A major challenge is ageing in-service equipment, some of which originates from the 1970s. The evolving legislation baseline and poor historical record-keeping complicates compliance, particularly concerning hazardous materials. The maritime domain within DE&S faces significant resource shortages and complexities due to new platform requirements. The Defence Maritime Regulator (DMR) reports that the 'safe to operate' assessment has decreased to LIMITED assurance, with issues in SQEP, risk management, and the management of transition of vessels from build to service. The DSA and DE&S both have a dependency on the Naval Authority Technical Group (NATG). However, it is poorly resourced and therefore presents a high risk to procurement given the current surge in maritime acquisition both in DE&S and in the Submarine Delivery Agency (SDA). Similar issues in the land domain with new and legacy platforms including obsolescence challenges are impacted by the removal of workforce substitute funding and recruitment restrictions.

Positive actions and improvements for safety during the reporting period include:

Safety Culture. During this reporting period there has been a strong tone set from the top of DE&S and steady improvement and maintenance of assurance levels has been reported across the regulators for DE&S. A strong positive safety culture has been demonstrated through collaborative working, proactivity and better stakeholder engagement with regular and productive lines of communication. In particular DE&S has continued to make improvements in land systems safety performance in collaboration with the Army and actioning reviews of 40% of land equipment safety cases through the formation of the land system certification project. They have also worked closely with the Military Aviation Authority (MAA) to facilitate the rapid, safe fielding of capabilities to support Ukraine. The Defence Fire Safety Regulator (DFSR) has identified improving levels of compliance being identified across the estate particularly within fire leadership, governance and culture.

Environmental Protection

The DSA collective Environmental Protection (EP) dataset has resulted in LIMITED assurance; Major Accident Control data from Defence Ordnance, Munitions and Explosives (OME) Safety Regulator (DOSR) demonstrate SUBSTANTIAL assurance. Evidence from three Defence munitions sites (DM Crombie, DM Kineton and DM Longtown) showed low-level improvements regarding oil-water interceptor documentation, with good awareness of environmental considerations and comprehensive environmental risk assessments.

3.6 – Defence Infrastructure Organisation – LIMITED Assurance for Safety and LIMITED Assurance for Environmental Protection

Safety

The Defence Infrastructure Organisation (DIO) continues to make significant improvements but remains at LIMITED assurance for both safety and EP. Key areas identified for safety were:

Fire safety. The Defence Fire Safety Regulator (DFSR) continues to deliver "inform and educate" sessions with DIO Project Managers (PM) in the overseas and visiting forces areas to help improve the understanding of the fire safety duties associated with infrastructure. However, despite this, DFSR is still identifying DIO PMs who do not fully understand the processes contained within JSP 850 and do not follow due process. As reported in the previous AAR, ongoing performance monitoring of tier 2 and tier 3 contractors undertaking servicing and repair of infrastructure by DIO Technical Services and the Future Defence Infrastructure Services (FDIS) commercial services must continue. However, it is noted that reduced staff levels within the DIO technical services team is impacting the monitoring of maintenance and installation of fire safety systems.

Assurance. The development and implementation of the DIO Diving Policy, and the conduct of assurance and related activities, have all improved in-year. DIO commercial diving expertise continues to provide valuable additional support in-year to other Defence organisations for their diving operations. However, there are a number of domain actions and issues that remain outstanding from the previous AAR to those sites where DIO has the HoE responsibility. Issues include: the non-conformances identified by the Defence Fuel and Gas Safety Regulator (FGSR) ; appropriate and timely action not being taken regarding risk assessments and safety cases for Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) assessments; liquified petroleum gas safety arrangements; and supervision, contracting and control activities. Within the fire domain, assurance at the 1LoD is effective at checking individual competence, but the lack of resource at 2LoD reduces overall assurance in areas where Establishment Fire Focal Points (EFFP) are not established.

Positive actions and improvements for safety during this reporting period include:

Governance and leadership. Previous reports identified the need for stronger leadership, understanding of legislation and regulations, and the application and communication of these requirements. To enable this, DIO has improved its governance and leadership which is enabling it to set the right culture and direction to meet changing and evolving organisational needs. In addition, the SMS was fully implemented and is maturing; this should help enable a move towards a SUBSTANTIAL rating. However, inconsistency remains around the understanding of the DIO safety vision, and greater

communication and improved awareness is still required. There has also been increased participation and direction from within the Defence Fire Safety Leadership Board.

Environmental Protection

While Environmental Protection (EP) is acknowledged within DIO, the primary focus remains on health and safety. There is no overall DIO Environmental Management System (EMS) but some areas, such as training estates, have a local EMS that is not compliant with JSP 816. Resource limitations mean that the EMS falls significantly short of the environmental management and sustainability design envisioned in the Strategic Workforce Plan. The Chief Environment and Safety Officer (CESO) team does not currently include environmental management responsibilities, with most EP tasks undertaken by contractors. In addition, although environmental management standards, processes, and policies are established, adherence to these standards is problematic due to capacity constraints. Resource limitations also places compliance with legislation and regulation at risk, despite these being clearly outlined in policy and process. This is also the case for environmental management risks, which are documented and escalated as required, but assessment and consistency of risk mitigation remains lacking.

3.7 – Defence Science & Technology Laboratory – LIMITED Assurance for Safety and LIMITED Assurance for Environmental Protection

Safety

The Defence Science & Technology Laboratory (Dstl) has an overall assessment of LIMITED assurance for safety. Dstl's assurance score and its performance has remained largely unchanged for the last three years though it has had scrutiny from the DSEC following an explosive parallel processing incident, which has focussed recovery. Key areas identified for safety were:

Governance. Following the findings of the explosive event in September 2022, which identified a failure in direct supervision and control of activities, measures to ensure proportionate control of activities have been implemented – a consistent approach is now needed organisation-wide. While there is an organisational process for incident investigation and learning, improvements are necessary to reduce high-potential incidents; this process is under review as part of the safety reset. Safety case development is progressing and a revised hazard management framework has been approved with further improvement over the coming year. When looking at emergency arrangements, alarm management remains a challenge across the organisation. A policy and procedure review is underway to ensure responsibilities are clear and response arrangements are in place.

Positive actions and improvements for safety during this reporting period include:

Training. After low completion rates of health and safety training were observed early in the reporting period, Dstl paused all programme delivery for a day to focus on safety discussions, training, and housekeeping. This resulted in a 20% increase in training completion. Dstl also initiated a revised risk assessment training programme, receiving excellent feedback and showing positive impacts on the quality of risk assessments. Competence and training have also been an area of focus, including a new safety re-induction programme for all personnel.

Assurance. There has been considerable effort after the 2022 event to improve Dstl's safety assurance under what has been termed a 'safety reset'. The 'safety reset' and other programs introduced within Dstl are addressing broader safety issues, with full support from the Dstl Executive, and are expected to continue for the next two to five years. Organisational leadership, culture, capability, and change management have all improved, addressing root causes identified from the incident in September 2022. The 'safety reset' will continue to reinforce necessary leadership behaviours to support cultural development across the organisation.

Environmental Protection

Whilst no formal internal Environmental Protection (EP) assurance has been conducted and the collective dataset results in LIMITED assurance, Dstl was positive in establishing a new EP committee to oversee compliance in advance of MOD's new Environmental Management System (EMS) performance framework. This committee is expected to provide more rigorous assurance of EP compliance. The Defence Ordnance, Munitions and Explosives (OME) Safety Regulator (DOSR) reported SUBSTANTIAL assurance for Major Accident Control, based on evidence from Dstl Porton Down. The environmental risk assessment was comprehensive, dedicated personnel demonstrated environmental expertise, and a good awareness of environmental sensitivities. Only small improvements were identified for spill control, bunding, and signage.

3.8 – The Ministry of Defence Police – SUBSTANTIAL Assurance for Safety and LIMITED for Environmental Protection[7]

Safety

All Ministry of Defence Police (MDP) operational police stations and HQ departments are required to complete quarterly assurance using the MDP Safety Management Action Plan (SMAP). This tool covers ten strategic priority areas to ensure compliance with JSP 375 and ISO45001 standards and involves self-assessment questions for senior police officers and heads of department. The SMAP is currently being updated by the new MDP head of HS&EP to align with JSP 815 and JSP 816 requirements.

No formal enforcement actions have been taken by statutory or Defence regulators during the reporting period. However, the most significant risk for MDP in 2023-2024 is SHEP064, which highlights the failure to manage health, safety, and wellbeing according to legislation, posing risks of physical and mental health harm due to recruitment and resourcing challenges. Personnel resourcing in the HQ MDP HS&EP team has improved to 80% of full capacity, though gaps remain in key disciplines like acquisition safety and environmental management.

There are concerns about the lack of Organisational Safety Assessments for ongoing transformation projects, presenting unknown future risks that need consideration to support operational activities. MDP has not yet adopted Defence Unified Reporting and Lessons System (DURALS/MySafety) due to technical barriers, but efforts are being made with partners and stakeholders to facilitate its adoption as soon as possible.

Environmental Protection

There was limited evidence provided of Environmental Protection management within MDP. The Defence Maritime Regulator provided some level of 3LoD assurance with reference to fuel and urea provision issues.

3.9 – Defence Business Services – SUBSTANTIAL Assurance for Safety and Limited for Environmental Protection

Safety

The Defence Business Services (DBS) maintains its SUBSTANTIAL assessment from last year. Key areas to note included:

> **Governance**. DBS's HS&EP annual strategic and operational action planning has demonstrated a strong commitment to continual improvement and has allowed DBS to document priorities and compliance with policy/regulation. DBS has continued to ensure its continued alignment with MOD policy, guidance, statutory requirements and best practice; continued up-skilling of the HS&EP team to meet the DBS goal to be represented by NEBOSH-qualified focal points; share good practice and build expertise.
>
> **Assurance**. The DBS HS&EP team undertook an in-house 1LoD assurance programme visiting their core sites to assess documentation and the physical HS&EP measures. Reports and action plans were created for all sites and issues to HoEs. The outcome of these visits showed strengths under JSP 815 with full assurance in many areas. Equipment safety was the main area that required improvement. The UKStratCom CESO visited the Abbey Wood North Site in September 2023 and the main areas of concern were gapped safety posts with no building custodian or establishment fire focal point.

Environmental Protection

DBS's assessment of JSP 816 showed LIMITED assurance; recruitment of a new Environmental Protection Advisor will help DBS attain a better score in the next reporting year.

3.10 – UK Hydrographic Office – SUBSTANTIAL Assurance for Safety and LIMITED for Environmental Protection

Safety

The UK Hydrographic Office has an overall safety assurance rating of SUBSTANTIAL. To maintain this rating moving forward, more work is required to ensure mechanisms are in place to identify how safety risks are managed across the organisation. The organisation's leadership have been reviewing the effectiveness of their organisational SMS based on assurance activity undertaken.

The organisation has plans in place to introduce a competency process to assess and assure qualifications, behaviours, and skills of the workforce to meet Defence health and safety requirements and to allow all people, contractors, and the supply chain to easily access up to

date health and safety information relevant to their roles. It is important that lessons learned from previous infrastructure design, acquisition, build, operation, modification, and maintenance activities are shared effectively across the organisation.

Environmental Protection

The development of a new Environmental Management System (EMS) will address the three items that are currently assessed at NO ASSURANCE, but there is currently insufficient resource in place to deliver against the EMS.

3.11 – Oil and Pipelines Agency – SUBSTANTIAL Assurance for Safety and LIMITED for Environmental Protection

Safety

The OPA is not regulated by DSA or Defence's Major Accident Control Regulations (MACR). The OPA operates under the Control of Major Accident Hazards (COMAH) Regulations within the UK – the Competent Authority (CA) is the HSE and Environment Agency (EA) in England and HSE and Scottish Environment Protection Agency (SEPA) in Scotland. Within this reporting period there was an increase in engagement with the CA. Thirteen CA interventions/visits resulted in two legal actions, both related to emergency preparedness and mechanical integrity. Despite a c.50% rise in CA activities, Compared to 22/23, there was no associated increase in the number of legal actions and no enforcement actions (E.g. Prohibition or improvement notices) were issued.

Most Control of Major Accident Hazards (COMAH) reports including information about the operator, establishment, processes and inventory (type and category of dangerous substances and potential environmental impact) were scheduled for submission in 22/23 (Except for the Gosport Oil Fuel Depots due to modifications of its installations and activities, resulting in a change in dangerous substance inventory). The COMAH report for the Plumley cavern site due to its planned defueling, is due in November 2024.

The Basic Process Control System is now operational across most UK Oil Fuel Depots (OFDs), except Loch Ewe. The OPA has completed pipeline assurance inspections for the entire UK network, with some systems entering their second cycle of in-service inspection and assurance.

Environmental Protection

The Oil and Pipelines Agency (OPA) maintains an Environmental Management System (EMS) compliant with the COMAH Regulations. All UK OFDs conduct environmental risk assessments.

Over the period of review, there was one significant loss of containment (>200 litres) (Campletown - 8m3 of aviation fuel contained within bund wall area) and one smaller incident (Thanckes – 25 litres entered the Tamar estuary causing a sheen). A Reporting of Injuries Diseases and Dangerous Occurrences report (RIDDOR) was filed as a precaution for the larger incident in August 2023.

3.12 – The Defence Safety Authority – SUBSTANTIAL Assurance for Safety and N/A for Environmental Protection assurance

Safety

The Defence Safety Authority (DSA) has an overarching Safety and Environmental Management System for its business activities but is a lodger unit at all locations and therefore promotes and follows the HS&EP arrangements set by the Heads of Establishment. The DSA HS&EP staff also carry out physical quarterly reviews in respect of their satellite units to ensure HS&EP compliance of their personnel. Key areas to note include:

Assurance. The DSA has a customer supplier agreement with Chief Environment and Safety Officer (CESO) Strategic Command (UKStratCom) for competent HS&EP advice and support (as required) and an independent HS&EP audit function. The UKStratCom CESO conducted an audit of the DSA in June 2023, the recommendations from which were managed by the DSA internal quality management team. A business plan deliverable was set for 24/25 to carry out a complete review of H&S to ensure compliance. The progress of this review is being monitored through internal management forums and updates shared through regular communication across the organisation.

Governance. The DSA Chief Operating Officer acts as appointed DSA Safety Champion and senior lead for HS&EP. All regulator and branch heads have completed or enrolled on the senior executive Institute of Occupational Safety and Health (IOSH) course. HS&EP has been made a standing agenda item at the DSA Business Delivery Working Group, Management Group and Main Board to monitor performance and provide feedback from internal workplace inspections and Head of Establishment floor plate inspections. Communication of HS&EP messages are shared across the organisation regularly for awareness. Regular review of established HS&EP KPIs provides measures to track DSA's performance of its health and safety management arrangements.

The DSA has addressed enforcement sanctions following a Movement and Transport Safety Regulator audit in 2021/22, with all areas of non-compliance being closed in December 2023 thus ensuring the safe management of the DSA's white fleet and vehicle usage to ensure personnel safety.

3.13 – Head Office – LIMITED Safety Assurance for Safety and N/A for Environmental Protection

Safety

Head Office (HO) operates primarily as a low-risk, office-based organisation that escalates risks through the chain of command and health and safety meetings. Each establishment has its own Head of Establishment, Safety and Environmental Management Systems (SEMS), and safe systems of work to mitigate identified risks to As Low As is Reasonably Practicable (ALARP). Although HO collected self-assessments from various business areas, not all contributed, revealing gaps that need addressing.

SQEP. For much of 2023-24, the H&S team was under-resourced due to a long-term vacancy in the C1 H&S Advisor position, attributed to uncompetitive Civil Service renumeration. New posts were filled in December 2023, allowing progress on health, safety, and environmental protection (HS&EP) issues.

Governance (Fire). In January 2024, a Fire Risk Assessment (FRA) by CWB, a Private Finance Initiative contractor, rated MOD Main Building (MMB) as "Tolerable Green." Due to changes in JSP 426, MMB is now classified as a "Complex Building," requiring two annual fire evacuation exercises. A DSA Fire Safety Audit noted medium-level non-conformances and actions are being implemented to address these issues, with the next FRA scheduled for July 2024.

Section 4 – Defence Health, Safety and Environmental Protection Themes

4.0 – Section Scope

This section provides details of cross-cutting Health, Safety and Environmental Protection (HS&EP) themes that have been identified during analysis of reporting received from across Defence. This reporting includes performance and governance, self-assessments from the Defence organisations and assessments by the regulators for each regulated domain, along with additional HS&EP information gathered from across Defence.

Each theme has been labelled as either 'Emerging' (i.e. a theme identified during this reporting period or one that has now reached the AAR reporting threshold) or 'Enduring' (i.e. an existing theme identified in the previous year's AAR that continues to represent a risk to Defence). Examples included within each theme may be specific to one Defence organisation or domain but will typically be supported by additional evidence across other areas of Defence. To improve safer outcomes, preserve operational capability and protect the environment, each theme should be addressed, but with a more urgent focus on the existing themes that have been highlighted in successive AARs.

4.1 – HS&EP Themes

Increase tempo of activity (Emerging)

A consistent theme across most Defence organisations and DSA regulators is the potential repercussions on safety and environmental management systems of increasing demand on the workforce and platforms. Generally, this results in a higher tempo of activity, which is compounded by a tightening financial position and resource constraints. The impact is felt at many levels with issues such as maintenance schedules, crucial for sustaining operational efficiency and safety, often deferred or inadequately addressed due to resource and/or time constraints and the continued increase in operational demand being placed on platforms is impacting the ability for areas such as DE&S Ships to provide sufficient and timely support to platforms. This compromises the integrity of assets and could pose significant risks to operations and personnel. Due to the broad and general nature of this theme, the main lever to address it is for the centre to prioritise activity and for the TLBs to accurately report risks up to the centre.

Suitably qualified and experienced personnel (SQEP) (Enduring)

The persistent issue affecting numerous Health, Safety, and Environmental Protection (HS&EP) themes is the lack of Suitably Qualified and Experienced Personnel (SQEP). This problem is chronic, primarily due to recruitment and retention challenges, particularly in technical and engineering roles, and at supervisory levels. This issue has been highlighted in each Defence

Safety Authority (DSA) Annual Assurance Report (AAR) since the DSA's inception. An increasing trend of incidents related to lack of SQEP and supervision has been noted during this reporting period, despite efforts to manage these risks through reduced activity.

The lack of SQEP is a critical factor leading to several safety-related issues, directly impacting operational effectiveness and support to operational capability. Particularly of note this year, insufficient experienced personnel on the front line and within safety and EP domains constrain the ability to accurately assess safety and EP assurance and performance levels. This is also evident in the increasing trend in the absence of SQEP and increased gapping in 2LoD, specifically assurance, across TLBs which is becoming normalised.

Other specific areas affected include engineering and aircrew SQEP, where the dilution and rapid turnover of SQEP limit the generation and utilisation of flying hours, challenging the ability to conduct safe operations. The lack of Air Traffic Control (ATC) SQEP has also led to restricted operating hours at some airfields. Essential infrastructure technical authority areas face single points of failure due to SQEP shortages, increasing safety risks for the department and suppliers. Within training, a widening gap exists between those needing training and those qualified to provide it, further exacerbating SQEP shortages and possibly increasing safety risk. The dilution of safety-critical posts and rank de-enrichment due to recent change programs raises concerns about less experienced personnel managing risks effectively.

Defence faces ongoing challenges in recruitment and retention, intensified by competition with other public and private sector employers, an acute example is the Nuclear enterprise. This is also evident where effective delivery of healthcare within Defence depends on the ability to dynamically recruit medical and allied healthcare professionals by offering career opportunities that are at least comparable to those provided by the NHS and overseas institutions. The introduction of new technologies requiring different skill sets further aggravates SQEP shortfalls, as the department struggles to ensure safe and effective operation of new capabilities. The lack of SQEP is a persistent and critical issue impacting HS&EP themes, operational effectiveness, and HS&EP assurance across various departments.

Infrastructure safety (Enduring)

Infrastructure issues around the maintenance and standards in provision of infrastructure across the Defence estate have been reported in almost every DSA AAR. Whilst there have been improvements in some areas, the financial pressures seen in the final quarters of the reporting period are likely to deepen, further delaying or suspending works that are critical to ensuring a safe estate. As substantial parts of the Defence estate are over 50 years old, with insufficient investment over that time and competition with other Defence priorities, it is likely that there will be further infrastructure deterioration and increased safety risk. A reoccurring theme over several DSA AARs and remains a fundamental strategic risk is the historical underinvestment in infrastructure, this is evidence through the issues facing the Fire Rescue Services (FRS) where poorly maintained or absent training facilities impact competence in safety critical areas. There are also infrastructure challenges to regulatory compliance within the fuel and gas domain and compromise to the delivery of safe healthcare identified in 44 medical facilities. Finally, as an enabling capability, infrastructure non-availability can necessitate non-standard ways of operating, or force a change in activity, output or process, that indirectly increases safety risks. As a result of the current situation, the DIO has escalated a safety risk through Defence Risk Assurance to Defence Delivery Group and Defence Board, to outline that without significant

investment in resources and infrastructure (within accommodation) the risks cannot be satisfactorily mitigated, nor is the capacity to control this within the remit of DIO.

Accountabilities (Emerging)

Defence organisations and regulators have highlighted issues and confusion over the authority and accountability of individuals. The boundaries between Duty Holding and duty of care and the lack of awareness of the responsibilities of duty holder facing organisations, are not as well understood as they should be, particularly by some Heads of Establishment, which impacts risk management, and more broadly the delivery of safety and environmental cases and exemptions, waivers and concessions. Some Heads of Establishments do not fully understand their responsibilities or the process to escalate risks where they cannot be addressed by the establishment and the training is perceived by the HoE as inconsistent. Unclear lines of authority over financial responsibility has also directly impacted the delivery of compliance work on infrastructure, highlighting gaps in assurance when organisational change is undertaken that should be addressed in Organisational Safety Assessments (OSA).

Environmental protection culture (Enduring)

Defence faces significant challenges in bringing environmental management up to the same standard as health and safety management. Historically, environmental management has been delivered through Head of Establishment responsibilities at unit or site level (i.e. tactical level), and it has not been a prominent or integrated consideration when setting strategy, policy, or decision-making for Defence capabilities or acquisition (i.e. organisational level). There is now the highest requirement in place that Crown Ministers must show due regard to specific environmental principles when making or amending Defence strategies (as per Environment Act 2021). For Ministerial commitments to stand true, Defence attention on environmental protection must be flowed onwards into all Defence decision-making and planning. However, despite existing policy, there is currently minimal consideration or prioritisation of EP evident at organisational level (though acknowledgement of some policy in place to articulate accountability, roles and responsibilities). Our observations note that environment is only slowly being added to senior TLB/Command Boards but has yet to generate significant discussion and action on risk, hence there is little input on EP at DSEC, and Defence organisations themselves reported lack of maturity, priority or inclusion of environmental in Defence activities. Furthermore, there are issues with a poor culture of reporting environmental incidents, access to competent personnel and appropriate training, and thus EP lags far behind health and safety and is in need of significant reprioritisation to align.

Innovation, Trials and Experimentation (Enduring)

Across Defence there have been multiple examples of early regulator engagement, aligning with the Defence Command Plan, enabling successful innovation, trials, and experimentation. However, there are still gaps in the governance and assurance of some activity, and areas that have not got basic requirements in place, such as an accountable person or safety and environmental case. Artificial Intelligence is playing an ever increasing role in Defence. Whilst it remains unregulated, this is currently sufficient as long as the policy principles are applied, as in the JSP 936: Dependable Artificial Intelligence (AI) in Defence.

The Science, Technology, Innovation Group (formally the Defence Innovation Steering Group) has re-wired the way that it interacts across Defence, bringing together the three communities into a simpler structure. This has resulted in a much more efficient and coherent organisation,

that is proving to be more effective. Further work to corral all innovation activity into one ‘Orchard system’ to enable a single version of innovation across Defence is welcomed but it needs to be designed to trigger an early dialogue on safety and EP risk tolerance for new initiatives. The number of uncrewed systems in use is increasing throughout Defence. The MAA now has over 100 UAVs on the register. DMR has 49 uncrewed surface and sub-surface vessels/equipment, an increase of 37 registered over a three year period. DLSR has been involved in trials of hydrogen powered vehicles and autonomous land equipment.

Digital, Data Automation and Exploitation (Enduring)

The department’s ability to effectively use its safety and environmental data to identify and manage risks is hampered by an architecture that is fragmented and reliant on manual processes. Underinvestment in systems has resulted in critical risks in certain areas such as medical and the Defence Medical Information Capability Programme (DMICP), disrupting effective operational delivery and putting personnel at risk.

Older systems, such as the Army risk elevation process and OSA’s which are dependent on manual escalation which is prone to error, slow and labour intensive. The data lacks scrutiny and makes exploitation difficult at a local level, and very challenging at a departmental level. Systems are left to local managers to monitor which results in outdated information and inconsistent approaches to recording and escalating issues.

There are several digital initiatives underway across the safety & environmental enterprise, including the Defence Unified Reporting and Lessons Systems (DURALS) (Now known as MySafety), that collectively aim to bring a more corporate outlook for future data and information needs. These initiatives have been hampered by transfers of authorities and a tightening financial situation, including the DSA’s own digital transformation aspirations.

.

.

Annex A – Safety-Related Inquiries and Investigations

New and ongoing Defence Safety Service Inquiries (SI): April 2023 – March 2024:

- **12 July 2022 – Motorcycling fatality during a battlefield tour, Spain.** An SI was convened in August 2022 to investigate the circumstances in which a service person crashed while riding a motorcycle during the Royal Navy Motorcycle Club (RNMC) (Yeovilton) Battlefield Tour. The service person died on 15 July 2022. The SI is ongoing.

- **11 March 2023 – Fatality whilst undertaking adventurous training (AT) with unit in Austria.** An SI was convened on 21 April 2023 to investigate the circumstances in which a reservist service person collapsed and died while participating in an adventurous training exercise (Ex DRAGON STEELBACK SKI 23) at Stubai Glacier, Austria. The SI is ongoing.

- **26 May 2023 – Very serious injury while undertaking Royal Marines Close Combat (RMCC) training, HMNB Clyde.** Originally convened as an NSI, following review by DG DSA, an SI was convened on 11 October 2023 to investigate the very serious injury of a service person participating in RMCC training at HMNB Clyde. The SI is ongoing.

- **20 September 2023 – Fatal vehicle accident in the vicinity of Sennybridge Training Area (SENTA).** An SI was convened on 24 November 2023 to investigate the death of a service person in an accident while operating a service vehicle following departure from the SENTA in Wales. The SI is ongoing.

- **21 September 2023 – Fatality during military training exercise on the Driffield Fieldcraft Training Area.** An SI was convened on 11 October 2023 to investigate the circumstance in which a service person collapsed and died while participating in a military training exercise (Ex INKAS KHANJAR) on the Driffield Field Training Area in Yorkshire. The SI is ongoing.

New and ongoing Non-statutory Inquiries (NSI): April 2023 – March 2024

- **Noise-induced hearing loss.** Following multiple incidents involving noise-induced hearing loss as a result of being in close proximity to the detonation of a Simulator Battle Sound at the British Army Training Unit, Kenya in February 2022, the DG DSA directed the DAIB to conduct an NSI to identify the risks associated with noise-induced hearing loss due to small arms ammunition and pyrotechnics in the Land environment. The NSI is ongoing.

- **Civilian fatality involving a Land Rover.** On 1 June 2022. a civilian driver passed away following a three-vehicle collision involving a service Land Rover on the A11, near Mildenhall, Suffolk. This NSI is ongoing.

- **Submarine cold move incidents.** On 9 February 2023, a Submarine was conducting a planned cold move from the explosive handling jetty. During this move, three separate incidents occurred that require investigation. This NSI is ongoing.

- **Army Cadet mountain bike injury.** On 1 August 2023 during an evening mountain bike ride in the South Barrule forest, Isle of Man, an ACF cadet became separated from their bike and was later diagnosed with a serious injury. This NSI is ongoing.

- **RAF Public Order Training.** On 16 August 2023, a service person participating in Public Order training at RAF Honington suffered burn injuries to the lower legs. This NSI is ongoing.

- **Odiham motorcycle fatality.** On 16 September 2023, an off-duty reservist service person died whilst participating in an Odiham Motorcycle Club airfield riding day at RAF Odiham. This NSI is ongoing.

- **Mine Counter Measure (MCM) vessels collision.** On 18 January 2024 an MCM vessel manoeuvring within the UK Naval Support Facility, Bahrain, collided with another MCM tied up alongside. This NSI is ongoing.

Annex B – Defence Nuclear Assurance (Limited Distribution)

Issued under a separate cover.

dsa-enquiries@mod.gov.uk
www.gov.uk/defence-safety-authority