Defence
Safety Authority

DSA Annual Assurance Report

April 2024 – March 2025

Defence Safety Authority Annual Assurance Report 2024/25

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Introduction

The Defence Safety Authority (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). It sets and enforces Defence Regulations, and provides independent, evidence-based assurance and accident investigation to support the Ministry of Defence (MOD) in delivering its responsibilities safely and sustainably.

This twelfth Annual Assurance Report (AAR) covers the period from 1 April 2024 to 31 March 2025. It provides the SofS with an independent assessment of how effectively Defence is promoting, managing and implementing its HS&EP policy.

Over the past year, Defence has continued to evolve in response to strategic, technological, and fiscal pressures. The increasing integration of uncrewed systems, automation and artificial intelligence presents both opportunities and new challenges for safety and assurance. As these technologies mature, it is essential that safety considerations are embedded from the outset, supported by robust governance and clear accountability. Financial constraints have continued to impact the delivery of some safety-critical activities, infrastructure improvements, and environmental protection measures. Despite these pressures, Defence organisations have demonstrated a strong commitment to maintaining assurance standards. However, the pace of change and resource limitations have tested the resilience of our people, our equipment and our safety systems, and in some areas, progress has been slower than anticipated.

The number of safety-related fatalities remains low; this should not lead to complacency or overconfidence. Many recommendations from Service Inquiries (SI) and Non-Statutory Inquiries (NSI) remain outstanding and it is vital that Defence sustains momentum in closing these actions and embedding lessons learned. A proactive, learning-focused safety culture remains our best defence against future harm.

Looking ahead, the DSA will continue to adapt its regulatory approach to ensure it remains fit for purpose across a rapidly changing Defence landscape. Our focus will remain on enabling Defence to Win by operating safely, sustainably and effectively.

Alan Gillespie CBE MA BSc RAF
Air Marshal
Director General
Defence Safety Authority
30 June 2025

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Section 1 – Executive Summary

Introduction

The Defence Safety Authority's (DSA) Annual Assurance Report (AAR) provides the Secretary of State for Defence with independent assurance of Defence's compliance with his Health, Safety and Environment Policy Statement, Defence Policy and Defence Regulations. The AAR is compiled using a range of information sources, including regulator reports, contributions from Head Office[1] and all Defence organisations. This report provides assurance levels for Safety and Environmental Protection (EP) for each of the Defence organisations as well as providing the department with a benchmark against which to measure progress, understand trends and identify HS&EP issues that need attention.

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

Defence has made progress in clarifying top-level safety governance, with leadership roles now more clearly defined and senior leaders showing greater engagement in promoting a strong safety culture. However, EP culture remains much less mature. Risk management structures still face challenges, particularly in distinguishing between corporate and safety risk management, understanding how EP is managed through the mechanism of the principal risks and in clarifying oversight responsibilities. Defence Reform has created opportunity to improve safety governance, but progress has been hindered by staff turnover and limited resources. Critical forums like the Defence Safety and Environmental Committee (DSEC) have seen improved participation but remain limited in authority and therefore impact. Meanwhile, functional teams continue to collaborate effectively despite ongoing governance and staffing challenges, which need addressing to promote improvements in safety and EP performance.

Safety and Environmental Protection Performance – Investigation and Enforcement

During the reporting year 1 April 2024 to 31 March 2025, there were three safety-related fatalities of service personnel that are subject to open Service Inquiries (SIs).

In 2024/25, the DSA convened four SIs and initiated four Non-Statutory inquiries (NSIs). Seven SIs were finalised during the reporting period, either informed by Ministerial submission or published on Gov.uk.

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 13 new enforcements issued by the DSA during the period (April 2023 – March 2024) and 19 enforcements were closed, giving a net decrease of six. This brings the total number of open DSA enforcements at year end to 39, of which Navy Command (8; 21%) and UKStratCom (14; 36%)

[1] No longer a TLB at the time of writing.

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 (HSE), Environment Agency (EA) and Office for Nuclear Regulation (ONR), as well as other departmental auditors such as Government Internal Audit Agency (GIAA). This year the HSE issued two Notices of Contravention; a 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).

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

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

Defence Org	Air Command	Navy Command	Army	UK Strategic Command	Defence Equipment &	Defence Infra Organisation	Defence Science & Technology Lab	Ministry of Defence Police	UK Hydrographic Office	Defence Safety Authority	Oil & Pipelines Agency	Head Office	Defence Business Services
Safety	M	L	M	L	L	L	M	L	M	M	M	L	US
EP	L	L	L	L	L	US	L	US	L	L	M	US	L

The overall assurance assessments for safety and EP for each Defence organisation are shown above in Table 1-1. The only change for safety assurance levels from the 23/24 reporting period is an increase from LIMITED to MODERATE assurance for Dstl. The assurance levels for EP for the previous year were based on limited data, but this year's assessments reflect a more developed understanding, The updated scoring criteria now include an "unsatisfactory" rating, which recognises ongoing efforts but highlights that current performance still falls considerably short of expectations. While all areas have shown improvement, progress continues to be constrained, primarily by resource limitations and an associated reprioritisation of those resources elsewhere.

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

Most of the themes identified in this reporting period are enduring with some showing little evidence of ownership, positive action or improvement. In addition to the H&S governance issues covered in section 2, for this reporting period, three other main themes have been identified: shortfalls in Suitably Qualified and Experienced Personnel (SQEP), infrastructure safety and EP.

Suitably qualified and experienced personnel (SQEP). Defence faces widespread challenges in recruiting and retaining SQEP but is particularly evident in safety-critical and environmental roles. This has led to operational delays, compliance issues, and over-reliance on a decreasing number of critical individuals. Across domains, from naval certification to air operations and healthcare, staff shortages and inadequate training are compromising safety, EP and operational effectiveness. Addressing these risks requires investment in recruitment, training, and workforce planning.

Infrastructure. Defence infrastructure suffers from ageing assets, underinvestment, lack of technical expertise to support specialist infrastructure and poor maintenance, especially in maritime fixed-infrastructure, fire safety and medical facilities. These issues compromise safety and EP, disrupt operations and hinder compliance with modern standards. Risk mitigation efforts include enhanced assurance processes, increased stakeholder engagement and targeted reviews, but delays in funding and delivery continue to threaten critical facilities. Modernisation, improved oversight, and sustained investment will be essential to ensure infrastructure safety, healthcare resilience and war-fighting readiness.

EP. Recent structural changes across Defence, including removing it from top-level governance and policy focus, risks deprioritising EP and weakening its strategic oversight. Combined with ongoing shortages of qualified environmental personnel and underdeveloped assurance processes, EP is often limited to localised activities and excluded from broader planning. In some organisations, EP has been observed to be conflated with sustainability or climate initiatives, which further complicates consistent implementation. To address these challenges, Defence needs clear leadership, a defined operating model, and a cultural shift that embeds EP into governance, decision-making, risk management and incident reporting at all levels.

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 2024 to 31 March 2025. 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 in Defence

Leadership

Previous AARs have underscored the need to clarify top-level governance for safety, particularly regarding the role of 2PUS. As part of Defence Reform, this issue has been resolved for safety, with PUS now designated as the senior lead responsible to the Secretary of State for managing safety, but uncertainty remains for EP. Restructuring is expected to enhance role clarity and ensure an informed cascade of responsibilities across Defence, with tangible benefits anticipated in the upcoming reporting period. At the TLB level, senior leaders continue to prioritise safety culture, demonstrating increased engagement with their health and safety (H&S) responsibilities. While notable improvements have been observed, ensuring these cultural shifts permeate at all levels remains crucial. In contrast, progress in developing EP culture remains slow and in need of increased commitment and investment.

Risk Management and Reporting

Defence Risk and Assurance (DRA) continues to oversee MOD principal risks; the relationship between principal risks and safety/environmental risk management remains unclear. The decision to apply Orange Book[2] principles to safety and EP risk management is not mandated (by the Orange Book) and safety is not listed within its 'example risk categories'.[3] This results in the frequent conflation of corporate risk with safety considerations. Similarly, the Defence Audit Risk and Assurance Committee (DARAC) has unclear roles and accountabilities concerning safety risk management. As a PUS-owned forum, optimised for corporate risk rather than risk-to-life activities, its current function limits effective oversight of safety risks. Given the inclusion of safety in PUS' portfolio, there is an opportunity to clarify the DARAC's role with respect to safety. On managing risk, continued focus on education is needed at all levels; risk aversion is, on occasion, evident despite risk owners already possessing the necessary mechanisms to take increased Force Generation risk to meet operational imperatives.

[2] The Orange Book – Management of Risk – Principles and Concepts
[3] Ibid p.55.

Defence Reform

Defence Reform presents a valuable opportunity to enhance the effectiveness of the safety function and environmental protection performance. However, personnel turnover, within the Defence Reform team, and insufficient resources have hindered progress and undermined the quantity and quality of underpinning analysis from a safety function perspective. This lack of capacity has impacted the ability to thoroughly evaluate changes to the safety and environmental frameworks and their implications for managing safety and EP risk across Defence. One notable example is the Organisational Safety Assessment (OSA), which, although a mandatory component of change programmes, was initiated less than a month prior to the date of completion of the first phase of the programme and did not include EP impact. As a result, it was unable to inform the decision-making process effectively, leaving Defence with limited opportunity to make programmatic adjustments. Once the necessity of the OSA was recognised, a governance framework was swiftly established, allowing the assessment to play a more active and iterative role in guiding change. EP remains omitted from the OSA-informed governance without articulation of the impact.

DSEC

Despite improvements in senior attendance at DSEC meetings, overall effectiveness remains in question. The committee is not sufficiently empowered, in terms of finance levers, to effect meaningful change. Evidence of completion of actions is variable, with many ‘closed without comment’. This raises doubt about whether discussions and resulting decisions genuinely contribute to enhancing safety and environmental outcomes. Anticipated changes associated with Defence Reform may enhance the committee’s role providing the necessary financial levers, authority and elevation mechanisms to affect positive change in safety and EP governance.

HS&EP Functional Progress

Throughout the reporting period, safety and environmental functional partners have continued to navigate complex governance challenges. DDS and DSA have collaborated effectively, supporting each other in addressing governance-related difficulties. However, Defence Reform has proven demanding, with extensive efforts focused on identifying an optimal structure for the safety function and associated governance mechanisms. Some concerns from the previous year remain unresolved, particularly regarding workforce shortages within DDS and the Directorate for Climate Change and Environment (D CCE). Addressing these staffing gaps will be vital for ensuring robust governance and continued improvements in safety and environmental performance.

2.2 – Safety Performance

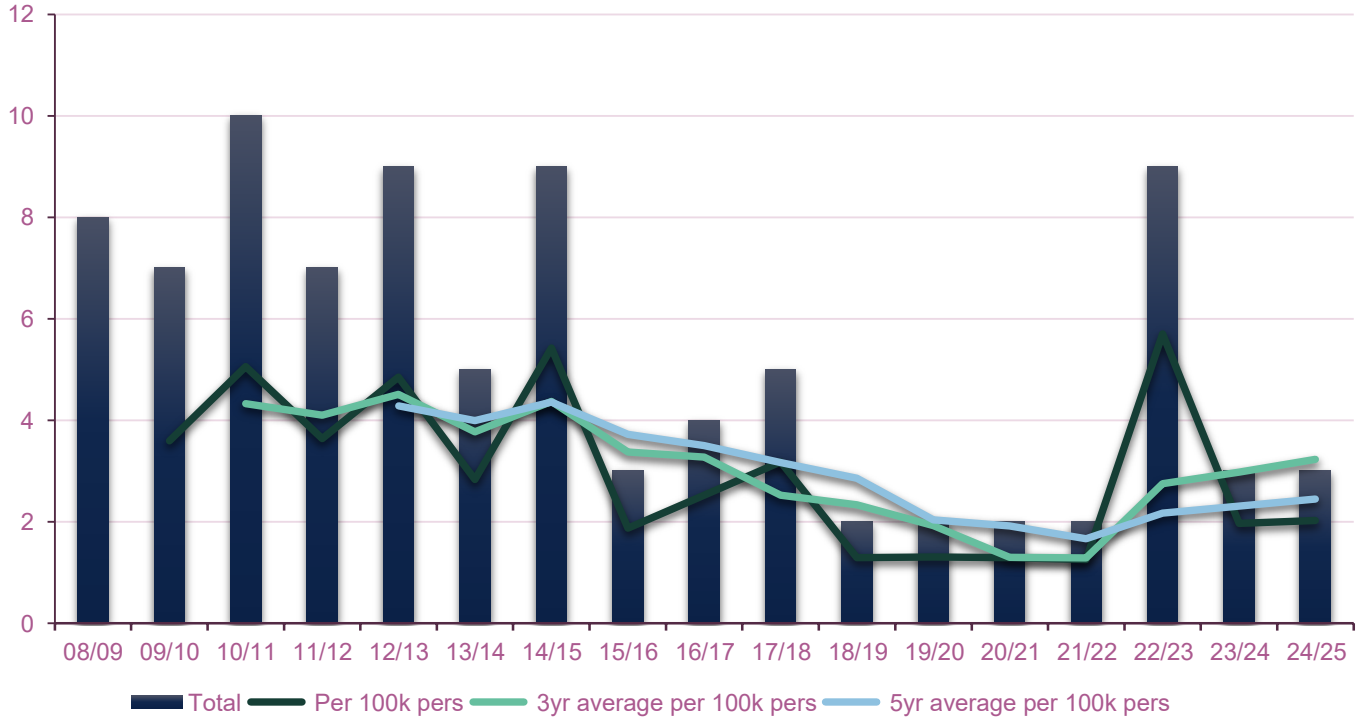
Safety-related Fatalities

Defence is required by law to investigate the death of a person subject to Service law if anything of consequence, for the regular or reserve forces, can be learnt that is not immediately apparent from the death. As a matter of policy, Defence is required, through Service Inquiry (SI) to investigate the death or serious injury of civilians, serious injuries to service personnel, or loss of major operating capability. A safety or environmental Non-statutory Inquiry (NSI) is a discretionary investigation into any safety-related, environmental event or loss of capability occurrence, where it is considered that the circumstances are insufficiently serious to justify an SI.

There have been three confirmed safety-related fatalities of service personnel during the reporting period that are being investigated by SI, as shown below; the same number of fatalities occurred during the previous period. In addition, one fatality occurred in an incident where, at the time of writing, the cause of death is undetermined.

- **25 May 2024** – Fatality of a service person in a Spitfire air accident near RAF Coningsby.
- **4 September 2024** – Fatality of a service person in a Merlin air accident while operating from HMS Queen Elizabeth.
- **15/16 October 2024** – Fatality of a service person at the Infantry Battle School, Brecon.

Figure 2-1 – Armed Forces Safety-related Fatalities[4]



Service Inquiries, Non-statutory Inquiries, and Recommendations

The Defence Accident Investigation Branch (DAIB) provides Defence with a professional accident investigation capability, maintaining teams of trained accident investigators at very high readiness to deploy anywhere in the world in response to an accident or 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, targeted recommendations made and tracked to closure. The intent is to reduce the likelihood of recurrence, enhance safety in Defence, protect the environment and preserve operational capability.

In 2024/25, the DSA convened eight investigations (four SIs and four NSIs), with nine in progress at the end of the period. Seven SIs were finalised in the period. These included: the death of a soldier following completion of a military exercise at Driffield fieldcraft training area; the serious injury of a service person from 43 Commando, Royal Marines, while undertaking close combat training at His Majesty's Naval Base Clyde; and the death of a Royal Navy service person in a motorcycle accident in north-east Spain. The DSA also completed nine NSIs.[5]

[4] Fatality figures are drawn from MOD, *MOD Health and Safety Statistics: Annual Summary & Trends Over Time 2019/20 - 2023/24*, 2025. Full-time Armed Forces comprise all UK Regulars and, Gurkhas and Full-Time Reserve Service

[5] Including completion of an audit into noise-induced hearing loss (NIHL), which was then followed by a Defence action plan to progress the issue.

The overall total of 16 investigations were completed with 193 recommendations generated as a result; a total of 206 recommendations were closed.

At the end of 2024/25, 490 recommendations from all investigations remained open. This is compared with 543 at the end of 2023/24 period.

17 published SIs were reviewed for trend data on causal, contributory and aggravating factors for a five-year period from Jan 20 to Apr 25. The analysis provided limited statistically significant trend data. Regarding causal factors, there were two deaths linked to undiagnosed heart conditions and an underlying trend of human error and failure to follow procedure across accidents, including errors in judgement, techniques or execution of tasks. Contributary factors provided a relatively larger statistical base for analysis with training deficiencies and competence gaps as the leading most widespread factors followed by deficiencies in supervision, risk management and missed opportunities for organisational learning from prior events.

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

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 (HSE), Environment Agency (EA), Care Quality Commission (CQC) and Office for Nuclear Regulation (ONR), as well as other Cross Government departmental auditors such as the Government Internal Audit Agency (GIAA).

Whilst the HSE cannot prosecute the MOD or its Crown Body Agencies in a criminal court, it can award a Crown Censure against them. Additionally, the HSE can issue improvement or prohibition notices to the MOD or its Agencies, however, these will be in the form of Crown Notices. The award of either of these enforcement actions is considered very seriously by the MOD.

This year the HSE issued three Notices of Contravention (a lower-level sanction than a Crown Censure) as shown at Table 2-2. This is a significant decrease compared to the previous reporting period. Responses to these Notices are led by individual Defence organisations and overseen by Directorate of Defence Safety (DDS). As observed in previous AAR's, there is still no evidence of pan-Defence analysis completed across the HS&EP Enterprise on external enforcement actions to understand generic themes and trends; more extensive thematic analysis of enforcements would significantly improve the development and implementation of recommendations across Defence. Digital enhancements would also improve data capture and enhance the analysis.

Table 2-2 - Notices of Contravention.

Date	Indicative Title	Organisation Responding
13 Aug 24	Gas safety and pipelines maintenance	DIO
16 Oct 24	Improve Risk and Planning Assessments for Training Courses (with emphasis on hazardous activities)	Army
11 Dec 24	Assault Course Maintenance	Navy

DSA Enforcement

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

- Act to immediately deal with serious safety risks.
- Achieve sustained compliance with Defence regulations.
- Are held to account for failing to 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. There were 13 new enforcements issued by the DSA during the period (April 2023 – March 2024) and 19 enforcements were closed, giving a net decrease of six. This brings the total number of open DSA enforcements at year end to 39, of which Navy Command (8; 21%) and UKStratCom (14; 36%) held the majority. A significant proportion of the enforcements were related to infrastructure maintenance issues associated with fuel and gas installations. The three oldest enforcements, more than five years old, all relate to fuel and gas infrastructure issues with the involvement of multiple agencies and contractors contributing to delays. Most enforcements (32) 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 AAR provides the Secretary of State with an independent view of the progress that each Defence organisation has made towards MODERATE levels of HS&EP assurance, notwithstanding the ultimate headmark of SUBSTANTIAL assurance. This section outlines the level of assurance for each Defence organisation (Table 3-1) and includes the key supporting observations. The analysis is based on information from the DSA, DDS, D-CCE and self-assessments from across the Defence organisations.

The information presented within this section is not exhaustive and provides a high-level summary only, more detail can be found within the DSA 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.

Table 3-1 – HS&EP assurance assessment of Defence organisations[6]

Defence Org	Air Command	Navy Command	Army	UK Strategic Command	Defence Equipment & Support	Defence Infra Organisation	Defence Science & Technology Lab	Ministry of Defence Police	UK Hydrographic Office	Defence Safety Authority	Oil & Pipelines Agency	Head Office	Defence Business Services
Safety	M	L	M	L	L	L	M	L	M	M	M	L	US
EP	L	L	L	L	L	US	L	US	L	L	M	US	L

The levels of assurance are categorised as: Substantial (S), Moderate (M), Limited (L), Unsatisfactory (US) or Not Assessed (N/A) (see Figure 3-1). During the reporting period, JSP 815 and JSP 816 were amended to align the assurance gradings with the GIAA, taking effect on 1 Apr 2025.

Figure 3-1 – Defence HS&EP Assurance Levels

[6] Due to classification DNO is reported on Secret

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Assessment and criteria to determine the level of assurance of Defence Function/TLB/HLB/EO key controls and compliance requirements	
Assessment (GIAA aligned)	**Criteria**
Substantial	You have robust evidence to demonstrate that prescribed policies, processes and key controls that **should** be operating in your area **are fully embedded**. You have robust evidence to demonstrate that policies, processes and key controls **actually** help you manage your key risks. You have robust evidence to demonstrate that the policies, processes and key controls are **actually** operating as intended and no weaknesses have been identified.
Moderate	You have evidence to demonstrate that prescribed policies, processes and key controls that **should** be operating in your area are fully embedded **but these could be improved.** You have evidence to demonstrate that these policies, processes and key controls **actually** help you manage your key risks **but these could be improved.** You have evidence to demonstrate that the policies, processes and key controls are **actually** operating as intended, but have identified some **minor areas of noncompliance** with the defined policies, processes and key controls.
Limited	You have **some, but not enough** evidence that prescribed policies, processes and key controls are operating and are embedded. You **do not have confidence** that the policies, processes and key controls are designed to **actually** help you manage your key risks. You have evidence to demonstrate that the policies, processes and key controls are **not actually operating as intended** or not operating in **numerous instances**.
Unsatisfactory	You have evidence that the prescribed policies, processes and key controls are **lacking or not well defined** or **not actually embedded**. You have evidence that the policies, processes and key controls are defined, but as designed, **do not** help you manage your key risks. You have evidence that the policies, processes and key controls **are not measured** to be able to assess **compliance or** are **not being adhered** to.

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

Safety

Navy Command reports that their safety resilience is heavily impacted by workforce challenges, risk management across Defence and assurance functions. This affects Navy's ability to execute an effective Safety Management System (SMS), leading to risks that could harm personnel and equipment. To mitigate this, Navy Command (NC) has made progress in managing health and safety, though persistent issues remain, especially in personnel competency, outdated infrastructure, and immature Safety & Environmental Management Plans (SEMPs). The Continuous Learning for Excellence & Assured Resilience Plan (CLEAR Plan) has been introduced to address these failings, providing a structured approach to improvements within the Royal Navy (RN).

Concerns have emerged regarding the management of submarine risks. The findings from Defence Maritime Regulator (DMR) audits are expected to prompt targeted actions to improve safety management arrangements, documentation, and culture. Resolving these issues will require a dedicated investment of both personnel and financial resources. More details are contained within the DMR/DNSR classified annexes.

Key safety policies require review and improved governance, with unresolved Improvement Notices highlighting systemic gaps. Navy has been proactive in seeking out gaps in their assurance framework and are producing plans to address these gaps, particularly in fuel and gas management, as well as third-party operations, where compliance is often assumed rather than verified. Whilst resource issues have been recognised and are being addressed, concerns remain across all competency requirements due to workforce limitations. Healthcare within the RN also faces challenges, notably in training availability, operational safety (due to underperforming medical information systems) and fragile medical logistics for critical supplies.

Efforts to enhance safety governance include the Navy Safety Strategy (NSS), aimed at strengthening governance risk management and assurance over the next five years. Notable improvements include new risk assessment training and MySafety for better incident tracking. Additionally, collaborative engagement with the Defence Land Safety Regulator (DLSR) has bolstered safety efforts in newly established training centres and addressed safety deficiencies in Major Equipment Inspection infrastructure. Leadership continues to drive cultural shifts through infrastructure improvements and enhanced oversight mechanisms, ensuring safety remains a top priority across Navy operations.

Environmental Protection

Navy Command was assessed as LIMITED in assurance. While there were some strong areas, such as improvements in environmental planning documents and greenhouse gas monitoring, several concerns were raised. These include weaknesses in environmental reporting, such as underreporting refrigerant gas releases and hydrocarbon spills, and inadequate management of biofouling, with one ship entering port without proper hull cleaning, posing ecological risks. Although some progress has been made in integrating EP into safety and environmental

management systems, significant gaps remain in compliance management, setting environmental objectives, and ensuring accountability.

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

Safety

Army leadership has remained committed to fulfilling its obligations for Health and Safety. They have made significant improvements in complying with the Port Marine Safety Code and sharing best practice between facilities. However, overall compliance with TLB maritime S&EP policy has not shown significant progress due to a shortage of SQEP in S&EP roles and unclear direction regarding future Army maritime requirements. Audit and inspection processes are robust, with identified Known Activity Risks (KARs) managed through the Army's Health, Safety, and Environment Committee (AHSEC) and Land capability safety managed through the 3* Land Capability Safety Summit (LCSS). Enhancements include using the Strategic Delivery Synchronised Matrix (SDSM) for improved oversight and more frequent monitoring.

The Army's audit and inspection regime shows substantial governance of Safety, Health, Environment, and Fire (SHEF) across the Whole Force, with continuous improvement and engagement leading to greater cohesion within the safety enterprise. The MySafety reporting system, combined with a healthy increase in investigations and recommendations after the formation of the Army Safety Investigation Team, indicate a positive trend with a decrease in serious injuries. Efforts to refine workforce capability and ensure key posts are filled with competent personnel are ongoing. Despite advancements in capability safety management, challenges such as maintaining a skilled workforce and addressing underinvestment in facilities persist. The Army continues to invest in strengthening its safety culture and transitioning to a more proactive safety enterprise.

Specific areas for improvement in the land domain include Adventurous Training, Fuel & Gas and Land Systems. In specific locations, Adventurous Training centres require some targeted improvements in effective staff induction and competence assessments. 2LoD Fuel and Gas assurance needs to uncover overlooked compliance gaps and enforce the risk assessment standard. Land Systems concerns remain relating to Safety Case management leading to open Improvement Notices (INs) and Corrective Action Plans (CAP). Movements & Transport face challenges due to a fragmented management system, impacting operational efficiency. Adequate supervision for some Dangerous Goods (DG) activities remains insufficient, leading to errors and delays. The Military Aviation Authority (MAA) downgraded assurance due to workforce resource concerns and Army medical issues include a lack of learning from various assessments and reports due to the absence of a dedicated role and single point of contact.

Environmental Protection

Army Command also received a LIMITED assurance rating for EP, with some moderate areas. The assessment was based on a narrow environmental scope, with notable findings from a single site where enforcement actions were taken due to insufficient awareness of infrastructure capacity and lack of environmental considerations in major event planning. While EP controls are evident at the unit and site levels, there is a lack of clarity on how EP is reported across all activities and at the strategic level. Documentation often references "safety" in ways that may implicitly include EP, but the alignment between safety and environmental descriptors is unclear. It remains uncertain how senior leaders maintain oversight and ensure compliance with environmental legislation.

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

Safety

Air Command has shown a modest yet meaningful improvement in its Safety and Environmental Management System (SEMS) and overall safety assurance, maintaining a MODERATE rating due to strong performance in high-risk domains like Flight Safety, Explosive Safety, and Battlespace Management. However, persistent challenges such as workforce shortages, SQEP gaps, and delays in policy and infrastructure development continue to hinder progress, particularly in the Airworthiness domain. Despite some improvements, issues like increased reporting of procedural failures, underutilisation of Maintenance Resource Plans (MRPs), and inconsistent assurance practices across fuel and gas operations highlight the need for systemic changes and enhanced policy enforcement.

Efforts to address these challenges include the development of updated policies, training programs, and assurance processes, such as the revised Air 2PA question set and the establishment of the RAF Safety Centre Assurance Dashboard. Positive strides have been made in the Land Systems domain using contracted SMEs and improved collaboration, leading to better compliance and the formation of dedicated safety teams. Additionally, the RAF has responded effectively to enforcement in the Counter-Uncrewed Air Systems (C-UAS) domain and has made progress in areas like range safety, explosives safety, and fire safety management. However, gaps remain in areas such as cadet range training, infrastructure oversight, and the provision of written assurance for land activities, which are critical for legal and operational accountability.

Governance and assurance structures are evolving, with the introduction of new board formats and leadership meetings aimed at enhancing data-driven decision-making and environmental governance. The Air Command Air Safety Assurance Working Group and other collaborative fora are fostering cross-group learning and standardisation. While the assurance level for RAF Sport remains strong, with well-documented and resourced processes, the focus remains on mentoring and compliance. Overall, while Air Command has made commendable progress in several domains, achieving consistent and comprehensive assurance across all areas will require sustained effort, resource investment, and cultural change.

Environmental Protection

Air Command received a LIMITED assurance rating, with some areas assessed as moderate. While there is evidence of EP focus and key controls at the site level, such as on RAF ranges and during fieldcraft training, there are also long-standing issues – like unresolved infrastructure design concerns at certain sites. There is inconsistency in how EP is reported across different activities and at HQ level, resulting in visibility of site-specific environmental management only.. Although senior leadership has begun integrating EP into governance structures and risk reporting, the process is not yet fully embedded. This limits the ability to escalate site-level issues for broader learning or strategic consideration.

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

Safety

The latest assessment indicates that UKStratCom remains slightly short of achieving MODERATE Assurance, reporting LIMITED assurance due to a shortage of qualified personnel and unclear accountability for maritime activities. Despite some progress at the local level, there is inconsistency across the organisation, with limited sharing of good practice. Efforts to address these issues include a continuous improvement plan and the establishment of HS&EP priorities, but challenges remain due to the complex nature of the organisation and difficulties in recruiting and retaining specialist staff.

In the maritime domain, accountability arrangements remain unclear and there is a lack of SQEP for governance and operational oversight. Oversight for contracted maritime activities is inconsistent and there is a lack of understanding of the requirement for operational assurance and MOD oversight of contracted activities. While some areas show progress, such as DirOB addressing Corrective Action Reports (CARs) related to maritime activities, other areas like the Operational Energy Authority (OEA) and Defence Supply Chain Operation and Movements (DSCOM) face challenges with immature processes and reliance on contractors for SQEP advice.

In the land domain, there are disparities in 2LoD assurance, particularly in fuel-related aspects, leading to occasional reliance on 3LoD assurance. The recent allocation of additional resources has improved oversight and communication, but concerns over the absence of dedicated Engineering SQEP and maintenance tracking persist. Fire safety training has seen improvements, with increased engagement and resource availability, but challenges with specialist staff availability and civilian recruitment constraints may affect progress.

The Defence Medical Services (DMS) has made significant improvements by clearly articulating its vision, mission, and priorities, supported by updated agreements and comprehensive governance plans. Workforce risks are being addressed through new contracts, enhanced remuneration, and policy updates, leading to better audit outcomes and service quality. Defence Primary Health Care (DPHC) has made substantial organisational change such as the implementation of Total Triage and a new appointment system which has reduced GP waiting times by 26%, improving the patient experience. However, despite these advancements, challenges remain such as the

continual significant underperformance of the Defence Medical Information Capability Programme (DMICP) increasing risks (clinical and data) due to system age and instability, the fulfilling of regulatory obligations for autism and learning disability training, the fragile medical-logistics chain and the achievement of full operational maturity in combined practices. These gaps indicate medical safety oversight challenges, and therefore a need to remain vigilant. Although DPHC were awarded a Moderate assurance rating by second line assurance, recognising the progress made, the full impact of these improvements will only be evident as reforms mature. A more coherent, pan-organisational approach to healthcare governance, assurance and compliance, supported by stronger central coordination and clearer medical accountability across Top Level Budget (TLB) areas, will help build on existing progress and drive greater consistency across Defence.

Environmental Protection

UK Strategic Command received a LIMITED assurance rating, with some MODERATE areas. Positive practices were observed in emergency planning and environmental assessments, particularly at overseas sites, where collaboration with local conservation experts was evident. However, there is a lack of consistency in applying lessons learned across different locations. For example, issues previously resolved at one site were found again at another, suggesting weak accountability and insufficient maritime environmental management. Fuel transfer processes were identified as particularly vulnerable, with limited pollution response measures and no formal assurance regime. Additionally, there are gaps in delegation and oversight for environmental responsibilities, especially in areas involving large-scale fuel movement.

3.5 – Defence Equipment & Support (DE&S) – LIMITED Assurance for Safety and LIMITED for Environmental Protection

Safety

Defence Equipment & Support (DE&S) is currently facing significant challenges to address safety management issues within the organisation. The overall safety assessment is rated as limited, primarily due to resource constraints and the complexity of a major organisational redesign aimed at optimising DE&S's structure in response to evolving global threats. This redesign has necessitated careful monitoring and management of impacted safety margins and the need for a unified SEMS. The adoption of cross-cutting technology themes has further complicated integration with multiple regulators, increasing the training burden and reducing resource deployment efficiency.

Resource challenges are particularly acute in the Maritime Environment, where the introduction of complex new platforms like the Type 26 Frigate has highlighted significant shortfalls. The People Management Model (PMM) is intended to address some of these issues by managing resources more flexibly, but its implementation is still in progress. Additionally, budget shortfalls are impacting safe operations and assurance outputs, particularly in the Maritime Environment.

Efforts to improve safety and environmental management include the establishment of an Occupational Health, Safety and Environment (OHSE) Cell to provide skilled resources, the implementation of a Rail Safety Panel, and various themed audits. DE&S has excelled in the

certification against International Standards for Organisation (ISO) Management Systems, fostering a strong safety and environmental culture. However, the restructuring process has led to concerns about the understanding between accountability for delivery safety delegations and responsibilities for people resource, particularly in the Maritime Environment. There is a need for continued focus on resource allocation, safety assurance, and compliance with regulations to realise the benefits of the optimisation programme.

Environmental Protection

DE&S was assessed as LIMITED in assurance. While there are positive developments in environmental strategy, policy, and ISO accreditation, recent organisational restructuring has disrupted established roles and responsibilities. The removal of key environmental positions and the centralisation of expertise have created gaps and challenges to access resource availability. Although some areas have shown progress in compliance and organisational improvement, the transformation has led to concerns about the ability to maintain standards. The restructuring has also disbanded specialised environmental communities and introduced a new skills group, but demand for expertise is expected to exceed supply. The impact of these changes on compliance has not been fully assessed or addressed.

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

Safety

The Defence Infrastructure Organisation (DIO) currently holds a LIMITED assurance position, with all elements requiring further development to reach the desired next level. Key areas for improvement include ensuring a consistent approach to compliance and performance assurance, embedding safety leadership across all levels, and refining health and safety occurrence reporting to enhance organisational learning. Infrastructure service delivery, particularly contractor control, remains an area of focus, alongside addressing high vacancy rates and improving personnel skills to meet operational demands. Efforts to enhance health and safety awareness have been ongoing, including leadership training, the implementation of a culture survey, and a redesign of the Safety Management System (SMS) to improve accessibility and usability.

The establishment of new safety governance structures, such as updated committees and oversight mechanisms, has strengthened visibility and accountability. Diving assurance, despite an overall LIMITED assessment, has benefited from consistent second-line assurance and the implementation of DIO Diving Policy, reinforcing its exemplary status. Additionally, horizon scanning, and anonymous reporting have been introduced to identify and address emerging risks more effectively. A stakeholder map is under development to clarify roles and responsibilities across Defence, ensuring greater cohesion and engagement across the organisation.

Significant progress has been made in health and safety assurance, including the introduction of new roles within the DIO Health and Safety Policy and Assurance team, tasked with second-line assurance for various infrastructure risks. A revised assurance programme is underway, encompassing Legionella, Asbestos, Gas, Electrical, Fire, Construction Design and Management (CDM), and Environmental hazards. Work is also being conducted to standardise risk assessment

training, improve supervision of contractor activities, and enhance safe systems of work across all industry partners. Additionally, project managers are undergoing CDM health and safety training to strengthen risk management protocols. Recruitment efforts are guided by the Strategic Workforce Plan, prioritising health and safety roles to ensure adequate expertise and capacity within DIO. While progress has been evident, embedding these improvements across the organisation will take time to achieve the desired level of assurance and operational effectiveness.

Environmental Protection

DIO received an UNSATISFACTORY assurance rating, with some areas at limited. The primary concern is the absence of a formal Environmental Management System (EMS). While some inspections did not reveal major issues, the overall maturity of EP assurance is low, and the organisation lacks a structured approach to environmental governance.

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

Safety

Dstl has achieved MODERATE safety assurance. Dstls assurance activities have highlighted areas for improvement. Dstl's previous divisional structure led to varied approaches which lacked centrally supported systems for performance management, resulting in difficulty aggregating issues and understanding operational risks. Ownership of and accountability for some equipment was challenging, leading to difficulty understanding the safety implications of calibration, service, maintenance and repair. Communication and stakeholder management were difficult without centrally supported systems, hindering effective stakeholder engagement. Assurance activities reveal ongoing issues, but progress is hindered by unclear responsibilities and poor action tracking. Centrally supported action tracking and data collection improvements are needed, which are being addressed through "Organisation Design and Development" programme and the "Safety Reset" Programme.

Dstl is focusing on improving data collection and summarisation of assurance data, with efforts to integrate assurance into decision-making processes. Dstl's own organisational reform presents opportunities for improvement but also potentially threatens performance, requiring monitoring and mitigation throughout the change programme.

Environmental Protection

Dstl was assessed as LIMITED in EP assurance. Key issues include inadequate environmental assessments for maritime platforms, poor compliance with environmental legislation, and insufficient training and awareness among staff. These gaps suggest a need for more structured environmental governance and capability development. The rollout of DSTLs Environmental management system has been delayed and focus on this to address key issues is recommended.

3.8 – The Ministry of Defence Police – LIMITED Assurance for Safety and UNSATISFACTORY for Environmental Protection

Safety

Ministry of Defence Police (MDP) is currently at LIMITED assurance. The HS&EP Team is operating at 40% capacity due to significant in-year resourcing reductions. This has severely impacted the Force's ability to maintain essential safety and environmental competencies and to progress initiatives effectively. Although recruitment is ongoing, improvements are not expected until mid to late 2025. These challenges are compounded by broader staffing and competency issues within operational policing, which continue to hinder safety and environmental performance.

Despite having a formal Safety, Health and Environmental Management System (SHEMS), there is a widespread lack of awareness and understanding of health and safety governance among operational staff. The MDP is assessed as being in a "reactive" state,[7] with operational demand prioritised over safety. This has negatively affected risk management and incident reporting. Additionally, the relocation of the HS&EP Advisory Team to a unit with limited HS&EP expertise has placed further strain on the functional safety management and advisory framework.

Strategic decisions within the MDP are primarily driven by operational capability and financial considerations, often leading to a reactive nature to safety concerns. For example, a major organisational change implemented in April 2025 lacked a prior Organisational safety assessment. However, there is hope for improvement through increased oversight from the Army Safety Centre and strategic input via the HS&EP Board.

Safety case management remains a critical weakness, particularly in acquisition processes. While external delivery partners offer some assurance, internal capabilities to produce comprehensive safety cases are lacking. Efforts are underway to develop a dedicated Acquisition Safety and Environmental Management System (ASEMS), though progress is slow due to resource constraints.

There have been improvements in governance processes within the SHEMS and the Marine Safety and Environmental Management Plan (SEMP). However, issues such as contractual delays and design flaws in in areas such as new police vessels, continue to pose safety challenges. The MDP is taking a pragmatic approach, particularly regarding the PPC marine vessels, where they are working with the craft manufacturer and partners to ensure the issues are resolved.

[7] Parker-Hudson model for organisational safety culture, 2006.

Environmental Protection

MDP received an UNSATISFACTORY assurance rating, with some areas at LIMITED. While there have been improvements in environmental management plans, performance metrics are underdeveloped, and there are ongoing issues with emissions control. The management system tends to prioritise safety, with EP often overlooked. There is a lack of processes for identifying environmental risks, ensuring compliance, and maintaining qualified personnel.

3.9 – Defence Business Services – UNSATISFACTORY Assurance for Safety and LIMITED for Environmental Protection

Safety

No self-assessment received, and no DSA regulators have undertaken any assurance.

Environmental Protection

DBS was assessed as LIMITED by the Defence Environmental Protection Regulator (DEPR), with some areas at moderate. Positive findings include clear environmental roles, mechanisms for identifying compliance obligations, and examples of effective reporting. However, there is room for improvement in training, risk assurance, and communication of environmental responsibilities.

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

Safety

The safety assessment of the UK Hydrographic Office (UKHO) indicates a MODERATE level of assurance. UKHO is enhancing its safety case writing approach to improve the assurance process and has implemented a succession policy for chief executives to ensure document and process validity. Effective safety risk identification processes are in place through safety boards and working groups, alongside a robust continuity plan; however, document reviewing and control within the organisation need improvement. Action plans are in place to continue improving the performance for both System Safety and Occupational Health & Safety.

Environmental Protection

UKHO is assessed as LIMITED in assurance. Historically, the focus has been on safety, with little evidence of EP measures. However, progress is anticipated with the new requirements for contractors to conduct environmental impact assessments before starting work and the development of a new EMS (Environmental Management System) which will address all aspects of the framework which require improvement.

3.11 – Oil and Pipelines Agency – MODERATE Assurance for Safety and MODERATE for Environmental Protection

The Oil and Pipelines Agency (OPA) is a Statutory Public Corporation, not regulated by the 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 EA in England and HSE and Scottish Environment Protection Agency (SEPA) in Scotland. The OPA had a successful year with the CA, with ten interventions and no legal or enforcement actions. The Basic Plant Control System (BPCS) is operational across all UK Oil Fuel Depots (OFDs) except Loch Ewe. Key challenges include BPCS compliance for Loch Ewe, supporting major projects, and completing COMAH reports ahead of schedule.

OPA reported one safety-related injury in August 2024 and twelve first-aid injuries, an increase attributed to increased workforce. The OPA underwent three GIAA audits, all receiving moderate assurance. Port operations were fully assured against the Port Marine Safety Code and Defence Maritime Regulations, with satisfactory personnel security audits and no corrective actions from motor transport audits.

Environmental Protection

The OPA has an EMS that satisfies the requirements of the COMAH Regulations, as determined by the CA. It consists of regulatory compliance and monitoring programmes that implement UK and EU requirements, agreements, and permits. All UK OFDs have an Environmental Risk Assessment (ERA) undertaken in accordance with the Chemical and Downstream Oil Industries Forum (CDOIF) Guidance**.** The DSA have not undertaken any direct assurance activity during this reporting period.

3.12 – The Defence Safety Authority – MODERATE Assurance for Safety and LIMITED for Environmental Protection assurance

Safety

The DSA follows SEMS set by Heads of Establishment as a lodger unit at various locations, conducting workplace inspections monthly and quarterly to ensure compliance. The DSA has agreements with the Chief Environment and Safety Officer of Strategic Command for advice and audits, with recent recommendations managed by the business team. A 2024/25 business plan deliverable was set to implement a program of assurance on the HS&EP processes and reviewed by the DSA internal assurance manager to ensure compliance. Progress is monitored and reported through the DSA termly governance cycle management forums. The DSA Chief Operating Officer serves as Safety Champion, overseeing HS&EP, with training for senior heads pending. HS&EP is a key agenda item at management meetings, with regular communication and KPI reviews to track safety performance effectively.

Environmental Protection

As per safety, the DSA operates as a lodger unit, which limits its direct influence on environmental matters. However, it has made a positive impact where possible. For example, by introducing improved recycling facilities and establishing a new conservation area. The DSA has also delivered environmental awareness training to its staff, including members of the senior leadership team. Furthermore, the DSA Charter reflects a strong commitment to environmental responsibility.

3.13 – Head Office[8] – LIMITED Assurance for Safety and UNSATISFACTORY for Environmental Protection assurance

Safety

Head Office (HO) operates as a low-risk, office-based organisation with safety risks escalated through the chain of command and Health and Safety meetings. While high-level safety documentation at HO requires review and assurance programmes re-established, each HO establishment has its own SEMS to mitigate risks to As Low As is Reasonably Practicable (ALARP). However, the H&S team faced resourcing challenges in 2024-25, leading to prioritisation of immediate safety risks and Main Building activities over reviewing SEMS. Recruitment restrictions have hindered filling gapped posts, but efforts are underway to address staffing shortages. A recent audit in June 2024 of Main Building reported LIMITED Assurance with three "major" non-conformances, requiring action plans for 2025/26.

Environmental Protection

HO received an UNSATISFACTORY assurance rating, with some areas at LIMITED. While leadership has acknowledged EP in risk assessments, there is a lack of dedicated resources, outdated documentation, and minimal integration of EP into broader safety systems. This limits the effectiveness of environmental governance at the strategic level.

[8] Head Office no longer exists as a TLB at the time of writing.

Section 4 – Defence Health, Safety and Environmental Protection Themes

4.0 – Section Scope

This section provides details of cross-cutting 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.

4.1 – HS&EP Themes

Overall

The overall assurance landscape across Defence is at risk of deterioration due to the growing complexity of issue management and ongoing resource constraints. This trend increases the potential risks to both personnel and the environment, suggesting that critical issues are not being effectively addressed. While several recurring themes have emerged, such as low morale and the mismatch between tasks and available resources, the most significant contributing factors are weaknesses in H&S (covered in section 2) and EP governance, shortages of suitably qualified and experienced personnel (SQEP), and inadequate infrastructure, all of which are explored in more detail below.

SQEP

The SQEP theme highlights significant challenges across all Defence organisations. There are widespread deficiencies in recruiting and retaining safety-critical and environmental personnel. This is partly due to shortages in specific fields such as safety specialists and engineering, which is having a significant impact on experienced supervisory levels increasing safety risk. It is also due to budget constraints, impact of Civil service recruitment controls on resourcing and moral and external competition affecting the many roles that may have safety as part of their primary duty. This has led to fragility in HS&EP management, often relying on a single individual. The Naval Authority, responsible for certification of MOD shipping, faces certification bottlenecks due to short notice requests and staff departures, impacting compliance and delaying projects. Additionally, across wider Defence, prioritising certification over policy development has hindered updates to Defence Standards and Manuals of Airworthiness.

Operational and environmental risks are also a concern. The disposal of surface ships is complicated by the retirement of skilled personnel and limited SQEP, causing delays and compliance issues. EP efforts are hampered by low assurance levels due to a lack of qualified personnel. Training and competency issues further exacerbate these problems, with personnel reporting inadequate fire safety management courses and dual tasking roles making it difficult to manage responsibilities effectively.

In the air domain, a stretched workforce of operators, maintainers, and ATC operators, combined with ageing air systems, has led to competency challenges and operational output restrictions. For healthcare, recruitment agency challenges and military staffing issues have impacted clinical outputs, with a reliance on temporary staff contributing to workplace stress and the erosion of SQEP. Overall, these SQEP deficiencies pose significant operational and safety risks, requiring focused efforts on recruitment, training, and resource allocation to ensure personnel are suitably qualified and experienced to manage safety and environmental responsibilities effectively.

Infrastructure

Critical issues affecting Defence infrastructure remain, particularly in maritime fixed infrastructure, fire safety, and general estate maintenance. Maritime safety risks in submarine-supporting areas like Faslane and Devonport, are due to deteriorating infrastructure and are managed through restricted use of assets or taken out of service in the meantime. This comes at additional near-term costs and impacts both capability and the working and living environments of our people. Long-term investment plans are being put in place to remedy. Across the Army estate, ageing infrastructure – over 40% of which is more than 50 years old – poses significant lifecycle risks due to outdated construction standards and frequent asset failures. The maintenance of facilities for ordnance and munitions storage, as well as training ranges, is inadequate, increasing safety risks. EP infrastructure, such as oil water interceptors, often lack proper capacity assessments, limiting its effectiveness. Fire Risk Assessments (FRAs) are frequently vague and lack prioritisation, hindering effective risk mitigation. Additionally, poor construction quality and maintenance oversight, especially following outsourcing, have led to missed routine maintenance and reduced confidence in infrastructure safety.

Further concerns include the misuse of the term “operational” in infrastructure projects, leading to regulatory bypasses and increased fire hazards, particularly in Royal Engineers’ projects. The limited availability of Hot Fire Training Structures (HFTS) is affecting firefighter competence and wellbeing, with personnel often required to travel off-site, disrupting operations, and increasing risk. Recent issues relating to external cladding, concrete cladding, RAAC (Reinforced Autoclaved Aerated Concrete) and Asbestos have exposed the risks associated with construction methods used in the 1950-1980s. The exceedance of designed life expectancy exacerbates the associated infrastructure risk.

Despite Defence’s stated priority of maintaining a safe and compliant estate, underinvestment is impacting the asset condition of the infrastructure. Delays in infrastructure delivery plans and failed funding bids threaten infrastructure resilience, with examples including the closure of critical healthcare facilities. Ageing infrastructure is also incompatible with modern equipment and standards, affecting morale and compliance, with examples including non-compliant Mechanical, Electrical and Instrumentation (MEI) facilities and Military Working Dog kennels. Overall, this underscores the urgent need for investment, improved oversight, and modernisation to ensure safety, compliance, and operational effectiveness.

The mitigation strategies for infrastructure risks involve several different approaches. Assurance of contract delivery is managed through regional teams and the DIO audit process, with improvements incorporating ISO 9011 principles and a risk-targeted assurance approach that

prioritises ‘Risk-to-Life’ for MOD Estate facilities. The Compliance and Safety (CaS) team conducts Integrated Compliance Assurance Reviews (ICARs) to ensure key safety infrastructure compliance across the 1st and 2nd Lines of Defence (LoD), while Infrastructure Compliance Committee (ICC) Working Groups (WGs) focus on risk reduction with broad stakeholder involvement. In response to significant risks, new WGs have been formed, such as the RAAC response group. A Building Fabric WG has also been established to address infrastructure risks beyond the original ICC WG framework, and an ongoing review of the CaS team structure aims to enhance agility in responding to environmental damage risks and supporting mitigation efforts. These measures ensure critical infrastructure safety and infrastructure resilience and adaptability across MOD facilities.

Environmental Protection Governance

Recent organisational changes across Defence, particularly under Defence Reform, have significantly impacted EP. The removal of EP from top-level governance forums and policy statements has created a leadership and policy vacuum, risking the perception that EP is a lower priority. This lack of strategic direction could lead to unaddressed environmental risks, costly incidents, operational impacts and reputational damage. Structural changes in various Defence organisations have also been implemented without sufficiently appreciating the impacts on EP, despite policy requirements to assess such impacts. Compounding this, there is a widespread shortage of SQEP in environmental roles, worsened by recruitment constraints and retention challenges. These gaps weaken environmental management and assurance at all levels, in most cases limiting EP to site-level activities and excluding it from strategic planning and oversight.

Assurance processes remain underdeveloped, with minimal oversight beyond the first line of defence, limited integration into headquarters-level decisions and an unclear risk position at Defence level. This disconnect hampers the ability to identify and escalate environmental risks, leaving Defence vulnerable to compliance failures and with little ability to cohere issues. A lack of shared understanding of what constitutes EP further complicates matters, with confusion between EP, sustainability, and climate-related initiatives. Clearer definitions and a published operating model are needed to guide consistent application. Additionally, Defence should elevate the priority of EP, embedding it into governance and decision-making at all levels. Failure to act risks operational restrictions, financial penalties, environmental damage and reputational harm. Incident reporting remains low, suggesting under-reporting and a weak EP culture, which limits Defence’s ability to identify and manage environmental risks effectively. A cultural and structural shift is needed to restore clarity, capability, and accountability in environmental protection across Defence.

Annex A – Service Inquiry Publications

The DSA published four SI reports on gov.uk in 2024/25, on the following investigations:

- **Service Inquiry into the death of a service person following completion of a loaded march at Catterick on 24 November 2022**
    - The service person died of natural causes, due to hypoxic brain injury following cardiac arrest. The cardiac arrest was caused by sudden arrhythmic death syndrome.
- **Service Inquiry into the fatal collapse of a service person while undertaking a run in Sennelager, Germany, on 16 January 2023**
    - The service person died of natural causes, due to a sudden cardiac arrhythmia precipitated by undiagnosed chronic ischaemic heart disease.
- **Service Inquiry into the death of a service person following completion of a military exercise at Driffield Fieldcraft Training Area on 21 September 2023**
    - The service person died of natural causes, having suffered a cardiac arrest, due to an undiagnosed heart disorder.
- **Service Inquiry into the death of a service person during an adventurous training expedition to Stubai Glacier, Austria on 11 March 2023**
    - The serviceperson died of natural causes, due to a myocardial infarction (heart attack). The myocardial infarction was precipitated due to an underlying condition and a series of environmental factors, which included exertion at altitude.

Annex B - Safety-Related Inquiries and Investigations

New and ongoing Defence Safety Service Inquiries (SI): April 2024 – March 2025:

- **26 May 2023 – 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 serious injury of a service person participating in RMCC training at HMNB Clyde. The SI has been completed and will be published on gov.uk on 1 May 2025.

- **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.

- **25 May 2024 – Fatality of a service person in an air accident near RAF Coningsby.** An SI was convened on 14 June 2024 to investigate the death of a service person in a Spitfire of the Battle of Britain Memorial Flight shortly after take-off from RAF Coningsby. The SI is ongoing.

- **4 September 2024 – Fatality of a service person in an air accident while operating with HMS QUEEN ELIZABETH.** An SI was convened on 16 September 2024 to investigate the death of a service person in an accident in a Merlin helicopter while conducting deck landing training with HMS Queen Elizabeth. The SI is ongoing.

- **19 November 2023 – Structural damage sustained to HMS NORTHUMBERLAND during the period prior to 19 November 2023.** An SI was convened on 17 September 2024 to investigate the significant structural damage sustained by HMS Northumberland at a point immediately preceding 19 November 2023. The SI is ongoing.

- **15/16 October 2024 – Fatality of a service person at the Infantry Battle School, Brecon.** An SI was convened on 07 November 2024 to investigate the death of a service person taking part in a night navigation exercise while on a course at the Infantry Battle School, Brecon. The SI is ongoing.

New and ongoing Non-statutory Inquiries (NSI): April 2024 – March 2025

- **9 March 2024 – Fatality of a service person deployed on Exercise SAILFISH, Belize.** An off-duty service person deployed on Exercise SAILFISH, collapsed whilst competing in a civilian charity running race in Belize City. They did not respond to medical treatment and died later in hospital. Following a review of the incident, DG DSA convened an NSI in Apr 24. The NSI is ongoing.

- **24 April 2024 – Injury of service persons and horses of the Household Cavalry Mounted Regiment.** While passing a construction site on return to Hyde Park Barracks, following an extended watering order exercise, falling debris caused horses of the Household Cavalry Mounted Regiment to bolt. Three riders and two horses were injured and there were numerous reports of damage to civilian and commercial vehicles, property, and infrastructure. The NSI is ongoing.

- **31 July 2024 – Injury of a service person on Warcop range and other accidents, incidents and near misses from August 2023 to July 2024**. During a consolidation range practice on the Warcop Training Area in Cumbria, a service person from The Light Dragoons sustained injuries whilst unloading a heavy machine gun (HMG). The NSI was initiated to examine the incident and other range accidents, incidents and near misses in the preceding 12 months. The NSI is ongoing.

- **10 February 2025 – Injury to service person on Otterburn Training Area.** Whilst conducting an exercise with high explosive grenades on Otterburn Training Area, a service person dropped a live grenade as they were attempting to throw it, suffering multiple injuries. The NSI is ongoing.