



April 2025 – March 2026



Defence Safety Authority Annual Assurance Report 2025/26

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). Acting with operational independence, the DSA sets and enforces Defence Safety Regulations, and provides independent, evidence-based assurance and accident investigation to enable the SofS and the Defence Board to judge whether Defence's HS&EP policy is being implemented effectively in practice.

This thirteenth Annual Assurance Report (AAR) covers the period from 1 April 2025 to 31 March 2026. It provides the SofS with DSA's independent regulatory assessment of how effectively Defence is promoting, managing and implementing its HS&EP across the enterprise. This report does not aggregate or restate internal management or functional assurance returns; rather, it draws on regulatory activity, investigations, inspections, evidence-based analysis and self-assessment to provide an authoritative judgement on compliance, risk control and systemic maturity.

Version Record

Version 1.0

Version Date: 29 May 26.

Version changes: document created.

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Introduction



Over the past year, the collective vision set out by the Strategic Defence Review, the Defence Industrial Strategy and Defence Reform has initiated a period of profound strategic change. The urgency to achieve warfighting readiness demands us to innovate and introduce new systems at pace, all whilst legacy platforms are further extended in service, financial resources are re-prioritised and workforce challenges persist. This inevitably has stretched the ability of Defence Organisations to maintain existing outputs safely, whilst simultaneously preparing for change and transformation. Concurrently, Defence Reform has presented a significant opportunity to modernise governance structures for safety and environmental protection, clarify accountability and improve visibility of risk across the enterprise. Notwithstanding the

opportunity, at the end of this reporting period, many of the new arrangements remain in development, with escalation routes, funding mechanisms and assurance processes largely untested in practice.

Amidst so much change and an increasingly unstable international security environment, there is still much work to do to improve safety and environmental protection assurance levels across Defence. Defence organisations are increasingly open about assurance levels in their own self-assessments and there are signs of positive progress in many areas against these revised baselines. What is clear though, is that maintaining a strong safety culture is still fundamental to operational effectiveness, trust and achieving enduring warfighting readiness. Safety policy establishes expectations, but it is professional behaviour, clear ownership of risk, informed command judgement and the intelligent application of control measures that deliver safe outcomes to enable Defence operations. Whilst the number of safety-related fatalities remains lower than in previous years, this should not lead to complacency or overconfidence in realising the importance of a genuinely robust and healthy safety culture.

Through independent assurance, regulation and investigation, the DSA will continue to support Defence in meeting this challenge, and in providing Ministers with an honest, evidence-based assessment of whether HS&EP risks are being managed appropriately on their behalf.

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Air Marshal
Director General
Defence Safety Authority

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Section 1 – Executive Summary

This report provides the Secretary of State for Defence with an independent assessment of how effectively Defence is managing its Health, Safety and Environmental Protection (HS&EP). It draws on regulatory evidence, inspections, investigations and assurance activity to present an authoritative view of performance, risk and systemic maturity across Defence.

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

Over this reporting period, Defence has continued to operate in a complex and demanding environment, shaped by the imperative to maintain warfighting readiness while simultaneously delivering major reform and capability transformation. This has placed considerable strain on organisations' ability to sustain current outputs safely and with environmental awareness, whilst also adapting to new governance structures and operating models. Although this period of change presents a clear opportunity to improve coherence, accountability and visibility of risk, many of the new arrangements are still new and continuing to mature.

More broadly across Defence, persistent weaknesses remain in the practical management of HS&EP risks. While the Three Lines of Defence model provides a clear framework for ownership, assurance, and independent regulation, there is uneven maturity across the first and second lines and an over-reliance on governance activity as a proxy for effective risk control. Evidence indicates that failures most often stem from poor implementation of existing policies rather than from gaps in policy itself. This is reflected in recurring issues such as unclear ownership, inadequate risk assessment and weak supervision, with the clearest examples in this report arising from the Land domain. Regrettably, this has been a recurrent AAR theme for 3 years, that Defence has failed to address until very recently.

Organisational change, resource constraints, and capability pressures, particularly among delivery agents, are compounding the challenges described above and limiting the pace of improvement. While targeted interventions demonstrate the potential for improvement, such as increased scrutiny in high-risk areas and positive progress in the submarine enterprise; sustained leadership focus, clearer accountability and the development of a Defence Safety Committee endorsed action plan remain essential to ensure risks are effectively controlled. This will preserve the ability of Defence to operate safely and credibly.

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

The overall assessment is that assurance across Defence remains predominantly at the LIMITED level for both safety and environmental protection. While there are clear signs of progress in several areas, including renewed governance intent, improved safety management systems and more effective regulatory engagement, this is not yet sufficient to offset the scale of structural pressures faced by Defence. As a result, risk is being managed, but not consistently controlled, and assurance confidence remains constrained and variable across organisations and domains.

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Defence Org	Air Command	Navy Command	Army	Cyber and Specialist Operations Command	Defence Equipment and Support	Defence Infrastructure Organisation	Defence Science and Technology Laboratory	UK Hydrographic Office
Safety	M	L	L	L	L	L	M	M
EP	L	L	L	L	L	L	L	L

Table 1-1 – HS&EP assurance assessment of Defence organisations¹

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

The most significant and persistent constraint on improvement is the enduring shortage of suitably qualified and experienced personnel (SQEP). Workforce shortfalls remain evident across nearly all Defence activities, affecting both delivery and assurance functions. These pressures are driven by a combination of recruitment constraints, workforce churn, increasing demand, and organisational change. The result is reduced supervisory depth, diminished assurance capacity and increased reliance on minimum-compliance approaches, which collectively weaken Defence's ability to manage risk effectively and sustainably.

Alongside workforce challenges, ageing infrastructure and legacy capabilities continue to generate significant safety and environmental risk. The condition of the Defence estate, combined with historical underinvestment and increasing maintenance demands, is placing sustained pressure on organisations and their ability to deliver safe and resilient outputs. These issues are compounded by fragmented ownership and funding arrangements, which complicate the prioritisation and management of risk across the enterprise.

Environmental Protection remains an area of concern. While there is growing leadership intent and improving policy frameworks, the overall system remains less mature than that for safety. Persistent weaknesses in governance, assurance, and workforce capacity continue to limit confidence, and environmental risks are not yet consistently identified, escalated or managed across Defence. As regulatory expectations increase, these gaps present an expanding source of legal, financial and reputational risk.

Within the medical domain, workforce, digital and infrastructure challenges limit resilience and sustainability, with safe delivery often dependent on professional commitment rather than system strength. Fire safety remains a significant cross-cutting concern with gaps in competence, infrastructure and assurance contributing to ongoing risk.

Although targeted improvement programmes, strengthened leadership engagement and enhanced regulatory scrutiny are beginning to stabilise performance in several areas, they do not materially

¹ The OPA UK Operations are not regulated under the Defence Safety Authority or under Defence's Major Accident Control Regulations (MACR) so whilst included in the main report they are not included in the summary table.

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change the overall picture set out in this report. Serious and systemic weaknesses in workforce capacity, infrastructure, governance, assurance and risk control continue to constrain the ability of Defence to manage HS&EP risks effectively. Progress in areas such as submarine risk management shows that sustained focus, investment and accountability can deliver improvement, but these examples remain insufficient to offset the scale and persistence of the wider issues requiring attention. Delivering meaningful improvement will therefore depend on sustained action against the core themes identified in this Annual Assurance Report.

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

2.0 Section scope

This section provides an overview of Health, Safety and Environmental Protection (HS&EP) governance across Defence during the period 1 April 2025 to 31 March 2026. It sets out the Defence Safety Authority's (DSA) independent assessment of how effectively HS&EP is being governed, managed and assured during a period of significant organisational change. The section draws on evidence from regulatory engagement, assurance activity, and Defence organisation self-assessments to identify areas of progress and enduring concern.

2.1 Governance of Health, Safety and Environmental Protection in Defence

High-level governance of Health and Safety

During the reporting period, Defence has prioritised the redesign of senior safety governance arrangements under Defence Reform, in advance of the Defence Operating Model standing up on 1 April 2026. This work offers a strategic opportunity to improve safety coherence across the enterprise, enhance visibility of HS&EP risks, and strengthen ownership. The DSA recognises the positive work undertaken by Defence Reform in developing an Organisational Safety Assessment ahead of implementation, helping to ensure the safety architecture remains coherent and intact during transition to the future operating model. Nevertheless, the scale and pace of organisational change have also introduced some temporary uncertainty and risk into the management of H&S at a time of sustained operational demand.

While new governance structures, boards, and revised terms of reference are now largely defined by Defence Reform, including those for the Defence Safety Committee, these arrangements are still new and are continuing to mature. As a result, there is currently limited evidence from this reporting period to demonstrate they are consistently operating effectively in practice, and so their anticipated benefits have yet to be fully realised. For example, there has been limited observable collective action by the Defence Safety Committee in response to the 2024/25 DSA Annual Assurance Report. Governance must therefore now begin to move beyond focusing on establishing intent and direction and seek to realise the anticipated safer outcomes. As part of this, the DSA strongly recommends the Defence Safety Committee focuses on generating a credible response to this Annual Assurance Report, whilst continuing appropriate levels of oversight as the new Defence Operating Model achieves full implementation.

High-level governance of Environmental Protection

The Environmental Protection Policy Statement released by the Secretary of State in October 2025 provides a foundation to rebuild Defence-level direction and accountability. Whilst Defence environmental protection has shown cautious improvement at the tactical level, it is evident that significant gaps remain in overall enterprise governance. Weaknesses in clarity, assurance, risk articulation, and the availability of suitably qualified and experienced personnel continue to constrain confidence.

These issues have become more prominent through Defence Reform and wider organisational restructuring. While H&S retain established governance through the Defence Safety Committee under the Permanent Under Secretary, there is no equivalent Defence-level mechanism driving action on environmental risks or setting clear intent across other senior forums. Re-establishing environmental protection as a formal function is a critical next step to deliver the Secretary of State's intent, strengthen governance and assurance, and manage systemic risks. Without this clearer accountability, stronger assurance, and sustained resourcing, Defence will remain exposed to legal, financial, and reputational risks, with implications for readiness and freedoms to operate.

Risk, assurance and the three Lines of Defence

Persistent challenges in the management of HS&EP risks continue across Defence. While current Defence Reform activity is addressing some long-standing issues relating to higher-level oversight and coherence, there is potential for a gap to open between enterprise-level ambition and the consistent application of effective risk control at the delivery level.

The process for risk control is centred on a Three Lines of Defence model for the management and assurance of HS&EP risks. Senior leaders and delivery organisations own and manage risk arising from Defence activity at the first and second lines. Internal functional arrangements provide policy, coordination and developing second line oversight. The DSA provides independent third line regulatory assurance, investigation and enforcement under its Charter; this is centred on a risk-based approach to prioritise activity and ensure that limited resource is focused where the need is greatest.

These roles are complementary but not interchangeable and during the reporting period the DSA continues to observe a tendency across Defence to equate governance activity, internal assurance products and expressions of confidence, with effective risk control. Evidence from regulatory activity in this report indicates that such indicators do not reliably predict safe outcomes. The first and second lines of defence remain uneven in maturity, with significant variation in approach, depth and quality across many areas. Overall, this reinforces the importance of a fully functioning Three Lines of Defence model, combined with an effective system to escalate and treat activity risks coherently within the new Defence Operating Model. This will provide confidence that statutory and policy obligations are being met.

Duty Holding

Emerging changes to duty holding and management arrangements for high-risk activity represent a shift in how Defence has traditionally operated. Whilst the introduction of the Defence Operating

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Model and accompanying strategic cycles necessitates review of how these important principles are managed, experience shows that existing Risk to Life constructs have evolved over time through operational learning, investigation, and formal inquiry. Any changes to these established approaches therefore require careful consideration, underpinned by clear evidence, defined accountability, and robust assurance. This will help ensure positive progress and avoid added complexity or ambiguity that could inadvertently weaken, rather than strengthen, Defence's ability to manage its most serious risks.

Safety performance and outcomes

Despite comprehensive policy frameworks intended to ensure risks are reduced to As Low as Reasonably Practicable and remain tolerable, Defence continues to experience fatalities and serious incidents. The DSA regulatory activity shows that failures in risk management at the tactical level most often arise from inconsistent application of, rather than from deficiencies in, policy. Common features include poorly articulated risk arguments, unclear ownership, and insufficient challenge at the command level. Independent investigation through Service Inquiries and other investigations consistently identifies recurring contributory factors, including inadequate risk assessment, insufficient training, weak supervision, and failure to apply existing controls.

These outcomes reinforce a fundamental regulatory principle: safety performance is determined by how controls are implemented in practice, not by the existence of policy or governance structures. While mechanisms for learning from experience continue to generate corrective actions, sustaining those actions over time remains challenging, particularly where mitigation depends on enduring behavioural change, sustained resource commitment, or continued leadership focus.

This pattern has been observed most acutely in exclusively military activity within the Land Training environment. Engagement by the DSA with the single Services has prompted a swift and notable increase in second line of defence activity to address the underlying cultural factors driving these issues. In parallel, the DSA is developing plans to expand third line of defence assurance to include Land Tactical Training, providing greater independent scrutiny in this high-hazard area.

Delivery agents and capability risk

Delivery agents, including DE&S, continue to face significant pressure from organisational change, constrained resources, legacy capability burdens and chronic shortfalls in SQEP. Regulator evidence indicates that these pressures are contributing to immature safety-management arrangements, incomplete assurance coverage, variable evidential confidence, and systemic safety-case and compliance weaknesses across legacy and high-risk areas. While leadership intent, reform activity and prioritisation mechanisms are evident, they are not yet sufficient to offset the cumulative HS&EP risk arising from deferred improvement, workforce limitations and increasing obsolescence. In some areas, mitigating actions are managing pressure rather than fully resolving underlying risk. Leadership must guard against any safety-versus-capability mindset and ensure that safety forms part of the core decision framework alongside time, cost and performance in capability decision-making. This will ensure risks are considered proportionately at the appropriate points in the acquisition and delivery cycle and are visible to those who own them.

Submarine Flotilla

Last year's AAR reported significant concerns within the Royal Navy's (RN) submarine flotilla and the RN's response to audit has been first-class. Within the submarine and wider nuclear enterprise, sustained regulatory engagement, enforcement activity and corrective action programmes are beginning to deliver measurable improvement. Governance discipline, evidence quality and leadership focus have strengthened, and progress is evident at Senior, Operating and Delivery Duty Holder levels.

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 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 two confirmed safety-related fatalities of service personnel during the reporting period that are being investigated by SI, a small reduction on the two previous periods.

- **24 May 25** – Fatality of a service person at Episkopi Garrison, Sovereign Base Area Cyprus.
- **25 Jan 26** – Fatality of a service person on Heely Dod Range, Otterburn Training Area.

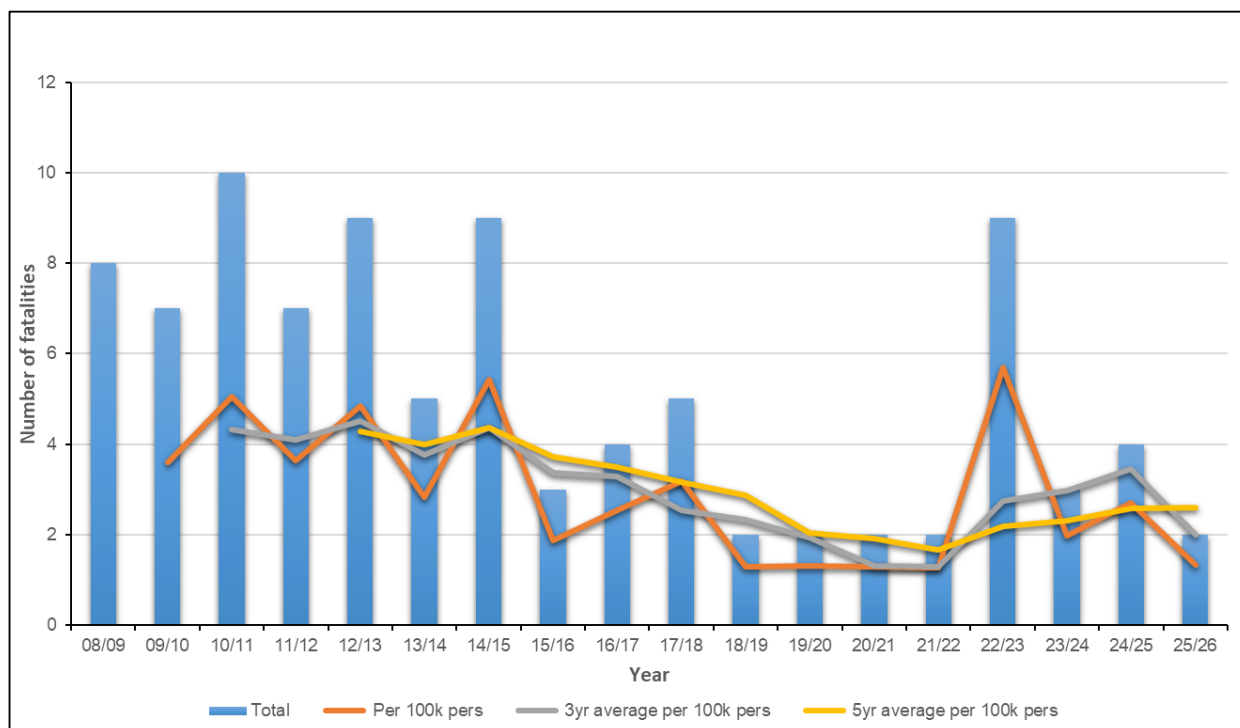


Figure 2-1 – Full-time Armed Forces Safety-related Fatalities²

Service Inquiries, Non-Statutory Inquiries, and recommendations

The Defence Accident Investigation Branch (DAIB) provides Defence with an accident investigation unit at very high readiness to deploy anywhere in the world. The DAIB conducts independent, impartial and expert no-blame investigations of accidents, serious incidents and near misses across all areas of Defence. By supporting DSA SIs and conducting DSA NSIs, DAIB investigations ensure that causal factors are identified and targeted recommendations are made before being tracked to closure. The intent is to reduce the likelihood of recurrence, enhance safety in Defence, protect the environment and preserve operational capability.

In 2025/26, the DSA convened 4 investigations (2 SIs and 2 NSIs), with 11 in progress at the end of the period. Two SIs were finalised in the period and 4 were very close to completion. The DAIB also completed 1 NSI, which led to 51 new recommendations being added to the recommendation implementation tracker. 124 recommendations were closed during the reporting period, leaving 394 recommendations from all investigations open; this represents a reduction from 467 at the end of 2024/25 period. DG DSA also engaged early across Defence to issue several items of Urgent Safety Advice³ prior to inquiry publication. This hastened changes to avoid repetition of factors that may contribute to future incident.

² Fatality figures are drawn from MOD, MOD Health and Safety Statistics: Annual Summary & Trends Over Time 2019/20 - 2024/25, 2026. Full-time Armed Forces comprise all UK Regulars and, Gurkhas and Full-Time Reserve Service

³ A DSA Urgent Safety Advice Notice (USAN) is a formal safety communication issued by the Defence Safety Authority (DSA) to warn Defence organisations of an immediate and credible safety risk that requires prompt action to prevent serious harm to personnel, platforms, equipment, the environment or Defence output.

2.3 – Enforcement Action

External enforcement action

In addition to the DSA’s Third Line of Defence activity, external inspections are provided by statutory 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 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 one Notice of Contravention (a lower-level sanction than a Crown Censure) as shown at Table 2-2. This is a 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).

Date	Title	Organisation Responding
1 Jul 25	Insufficient Noise Risk Assessment	RAF & Army

Table 2-2 - Notices of Contravention

DSA enforcement process

During the period, the DSA conducted risk-based regulatory activity across Defence to assess whether HS&EP risks were being effectively controlled in line with legislation, Defence regulations and Secretary of State policy. This included targeted inspections, system-level reviews, accident investigations and scrutiny of high-risk activities. In line with the risk-based approach employed by the DSA, effort was prioritised toward areas of greatest risk such as complex operations, ageing capability, infrastructure and organisational change. Where non-compliance or inadequate risk controls were found, the DSA exercised its powers to direct corrective action, impose operational restrictions or escalate issues through Defence governance and, where appropriate, to Ministers. Enforcement measures⁴ were then applied proportionately based on the severity and urgency of the safety or environmental risk.

DSA enforcement outcomes

Analysis of DSA enforcement data informs domain and organisational assurance assessments and provides evidence to support cross-regulatory safety and environmental themes. A summary of enforcement action over this reporting year is provided in Table 2-3.

⁴ Enforcement measures include formal notices, mandated corrective programmes and follow-up inspections,

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Reporting Year	2025 – 2026
Total Open Year Start	35
New enforcements	20
Closed Enforcements	11
Total Open at Year End	44

Table 2-3 – DSA Enforcements

Infrastructure maintenance issues, particularly those associated with fuel and gas installations, continue to feature prominently in enforcement activity. This reflects the extended timescales often required to design, fund and deliver corrective works, rather than a reduction in regulatory scrutiny. While some areas demonstrated a positive response to regulatory intervention, others continue to exhibit recurring weaknesses. These are most evident where risk ownership is unclear, assurance capacity is limited, or where effective mitigations are impacted by deferred investment. Collectively, these factors continue to constrain Defence's ability to close enforcement actions at pace and sustainably reduce risk.

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, Department of State, Transformation, Directorate Energy, Environment and Infrastructure (DEEI) 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.

Defence org	Air Command	Navy Command	Army	Cyber and Specialist Operations Command	Defence Equipment and Support	Defence Infrastructure Organisation	Defence Science and Technology Laboratory	UK Hydrographic Office
Safety	M	L	L	L	L	L	M	M
EP	L	L	L	L	L	L	L	L

Table 3-1 – HS&EP assurance assessment of Defence organisations⁵

The levels of assurance are categorised as: Substantial (S), Moderate (M), Limited (L), Unsatisfactory (US) (see Figure 3-1).

⁵ DNO is reported at a higher security classification.

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

Assessed as LIMITED, Navy Command continued to deliver core outputs against a backdrop of sustained operational tempo and significant organisational change. Overall assurance has improved from mid-range to the upper end of LIMITED, reflecting effective improvement plans, strong senior leadership engagement, and a growing sense of ownership for H&S across the workforce. This progress has been achieved despite unprecedented resource pressure, workforce churn and concurrent Defence transformation activity, all of which placed strain on the safety system. While governance transparency and self-awareness have improved, the system is not yet materially safer though; gains in maturity are being offset by structural degradation in workforce capacity, infrastructure and assurance resilience.

The principal barriers to a higher assurance assessment remain persistent workforce gapping, SQEP shortfalls, ageing platforms and estate, extended maintenance cycles, supply-chain fragility and fragmented digital risk data, all of which undermine safe-to-operate confidence. These pressures are evident across the maritime domain, where audits continue to identify maintenance backlogs, deteriorating material state and enduring operational demand. Furthermore, the transfer of Surface Flotilla assurance to Fleet Operational Standards has left key posts vacant, and Afloat Support (AFSUP) continues to face resourcing gaps, with an Improvement Notice (IN) open since 2021. Competency challenges, particularly during Basic Operational Sea Training and in Support organisations, have resulted in units sailing with SQEP deficits and some platforms assessed as not operationally ready.

Longstanding governance weaknesses persist within Land Systems. Assurance frameworks remain fragmented, with existing mechanisms providing only partial regulatory coverage with them not yet embedded within Navy Command's mainstream governance and risk management arrangements. These deficiencies continue to justify regulatory enforcement. More broadly though, engagement across all regulated domains remains constructive and is increasingly enabling safe operational output. The Defence Ordnance Safety Regulator (DOSR) engagement provides confidence that Ordnance, Munitions and Explosives (OME) safety processes are in place, although the overall assurance evidence base remains limited. In the air domain, close collaboration with the Military Aviation Authority (MAA), improved safety case quality and the wider adoption of modern risk management tools are strengthening assurance foundations, despite ongoing issues regarding aircrew SQEP dilution and a growing concern over the provision of a Safe Operating Environment aligned with the QE Class.

Within the Nuclear enterprise, ageing infrastructure, SQEP shortfalls and baseline safety case issues continue to shape the risk landscape at Clyde and Devonport; however, improvements in governance, internal assurance, readiness reviews and safety culture initiatives, including *One Clyde*, are stabilising assurance positions. In the medical domain, system fragility remains evident due to delayed digital modernisation and logistics vulnerabilities, although targeted investment has delivered localised improvements.

Environmental Protection

Assessed as LIMITED, Navy Environmental Protection continues to show clear leadership intent and incremental improvement, but enduring structural weaknesses remain. Progress has been made in environmental management planning, including refreshed SEMS material, strengthened maritime controls (Shipboard Oil Pollution Plan, garbage and biofouling management), improved documentation quality, and markedly better incident and near-miss reporting following the introduction of MySafety. Senior engagement has increased through governance boards and Direction Letters, with a refreshed 1SL environmental statement setting a stronger tone. Environmental considerations are now better reflected in platform and contract development (including Hybrid Navy and autonomous systems), and external stakeholder engagement has improved. These actions have driven greater transparency, a more open reporting culture, and growing environmental awareness across the Service.

However, these gains are being offset by persistent workforce shortages, insufficient environmental SQEP (particularly for novel systems and submarines), ageing platforms and infrastructure. Environmental risk management and assurance remain inconsistent, often subordinated to safety without compensatory EP risk assessment, with fragmented 1LoD assurance, late development of environmental cases, limited data exploitation, and weak oversight of contractor performance. Governance uncertainty during organisational change and difficulties escalating enterprise-level risks (e.g. potentially polluting shipwrecks) further constrain effectiveness. While the EMS is more mature than in previous years, it is not yet resilient; the outlook is cautiously positive, but sustained improvement depends on addressing EP SQEP shortages, strengthening directorate-level capability, and maturing assurance and risk management arrangements to prevent decline.

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

Safety

Assessed as LIMITED, Army is operating a SEMS under sustained pressure from organisational change, workforce constraints and increasing operational demands. Reduced assurance outcomes were recorded across adventurous training, high-risk sport, land systems, movement and transport and maritime activity, while certification was assessed as UNSATISFACTORY due to enduring shortfalls in funding, resourcing and process maturity. These weaknesses are compounded by workforce pressures, gaps in SQEP (both currency and competence), and inconsistent first-line risk assessment and assurance, with some safety-critical governance becoming overly checklist-driven rather than actively managed.

Assurance activity continues to highlight gaps between policy intent and delivery, particularly in safety-case management, equipment certification, Dangerous Goods governance, and activity authorisation. In areas such as parachuting, the emerging RA1700-series regulations posed a challenge in identifying appropriate Duty Holding ownership for non-combat parachuting. For the Army this extended beyond sports and display parachuting, due to a requirement to jump with foreign military Airborne Forces Equipment from foreign military aircraft.

For aviation, the Army faces additional challenges through: limited air-mindedness in the many organisations that are introducing small Uncrewed air systems; maintaining aircrew SQEP in Jt Aviation Command due to a paucity of flying hours and currency; and an increasing risk of mid-air collision due to proliferation of small Unmanned Aircraft Systems (sUAS). In the medical domain, overstretched assurance capacity, workforce shortages and underdeveloped systems for capturing and embedding lessons learned are placing pressure on clinical safety, continuity of care and governance resilience. Infrastructure and estate risks also remain prominent due to ageing systems and delayed rectification.

Despite these challenges, there are clear signs of improvement and commitment to progress. Senior leadership continues to refocus safety culture as a core element of fighting power. This is supported by strengthened governance through the Army Health, Safety and Environmental Committee, the *Safe to Fight 25* campaign, and maturing organisational learning arrangements. There is an opportunity to apply lessons from inquiries and ensure that the Training DLOD contributes more to safety. Second-line assurance capacity is improving as gapping reduces, supported by digital tools such as ASSURE (Assurance System Supporting a Unified Reporting Environment) and SPRITe (Safety, Performance, Risk and Issue Tracking environment), thereby enhancing visibility of risk. While risk management, safety cases and assurance coherence remain uneven, targeted reform, digitisation and prioritisation of high-risk areas offer a credible path to improving Army safety maturity over 2026/27.

Environmental Protection

Assessed as LIMITED this year, senior board-level governance of EP within Army is continuing to mature, with clearer visibility and direction across EP activity. Separately, increased attention is being directed toward per- and polyfluoroalkyl substances (PFAS) and the refresh of underpinning policy. Notwithstanding this progress, significant resource constraints persist and continue to drive gaps in second-line assurance. Delegated Environmental Protection roles require clearer and more consistent documentation, and regulators have raised concerns regarding maritime accountability interfaces, including ship-to-shore fuel operations. At site level, findings such as training area bunding and interceptor condition highlight the need for sustained local infrastructure focus. In parallel, the Command is working to rebuild EP culture and address the effects of historic under-investment in EP management, building on existing regional and unit-level activity. A formal review is also underway to align arrangements with Defence Safety Management System standards and to transition Environmental Protection into dedicated management systems that better reflect Defence-wide structures and regulatory expectations.

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

Safety

Assessed as MODERATE, there are evident strengths in aviation-related areas within Air although several statutory HS&EP areas continue to produce only LIMITED assurance. Workforce fragility, especially in engineering, remains a significant and systemic risk driver. Increased workload, persistent personnel shortages, high churn and limited supervisory depth are compounding safety risk across the organisation. These pressures degrade assurance quality, slow the delivery of

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corrective actions and reduce organisational resilience, creating a credible risk of future assurance decline if not addressed. In parallel, long-term underinvestment in infrastructure and estate, alongside ageing equipment, is generating cross-domain safety risk and constraining Duty Holder risk management. These challenges are exacerbated by reliance on external organisations such as DIO and contractors whose own resourcing and prioritisation issues limit timely resolutions.

Throughout the year, the Military Aviation Authority (MAA) identified issues regarding the effectiveness of the Safe Operating Environment and the quality of 1st and 2nd Line of defence assurance of some Force Elements. These issues culminated in enforcement action, comprising a Prohibit Notice halting all crewed flying at one unit and Improvement Notices issued to address inadequate assurance arrangements at Group level. Wider surveillance activity identified similar weaknesses at some other aerodromes reinforcing concerns that the benefits anticipated from Air Command's Command and Control (C2) optimisation programme have not yet been fully realised. Additional pressures include dilution of aircrew, engineer and controller SQEP and Aviation Duty Holder (ADH) concern regarding the threat of mid-air collision (MAC) between a Defence air system and sUAS. The rapid proliferation in civilian usage of sUAS has seen reported AIRPROX incidents rise significantly in recent years. MAC remained one of the 'Top 5' risks identified by the majority of all ADHs.

Notwithstanding these challenges, Air has made tangible progress in strengthening safety governance and assurance coherence. Wider adoption of the RAF Safety Centre Assurance Dashboard has improved consistency and transparency of second-line of defence assurance across multiple areas, while policy clarity has advanced following a comprehensive review of airworthiness engineering policy and enhanced competence frameworks for Explosives Safety Representatives. In addition, early engagement with the MAA has supported expanded testing and evaluation activity for specific Uncrewed Aerial System (UAS) categories. While these developments provide a credible foundation for future improvement, achieving sustained safety gains will depend on stabilising the SQEP pipeline, further modernising assurance systems, and embedding robust 1st Line of defence behaviours at unit level.

Environmental Protection

Assessed as LIMITED, Air Command shows some positive momentum, with improved aviation greenhouse gas management and increased incident reporting but remains exposed to ageing infrastructure and fragmented JSP 816 assurance. Efforts are underway to shift environmental protection culture beyond just Heads of Establishment, and towards activity-based risk (e.g. remotely piloted trials). However, progress is constrained by limited SQEP in aviation EP assessment and the visibility of EP data in assurance dashboards. Recent assurance activity identified mixed performance across sites, with areas of concern including out of date risk assessments and inspection shortfalls.

As a result, Air assess that EP assurance has regressed from MODERATE to LIMITED since last year, driven by workforce shortfalls, infrastructure deficiencies and wider systemic factors. This aligns with DSA assessment of Air as LIMITED, citing immature risk and governance arrangements and an environmental nuisance noise risk underpinned by outdated Military Aviation Noise Contours.

3.4 – Cyber and Specialist Operations Command (CSOC) – LIMITED Assurance for Safety and LIMITED Assurance for Environmental Protection Safety

Assessed as LIMITED, CSOC continues to exhibit a pattern of structural and persistent H&S weaknesses rather than isolated compliance failures. Performance across sub-organisations within CSOC is uneven, contributory factors towards this include varying maturity of safety management systems, inconsistent leadership engagement, complex and changing nature of the organisation and the continued difficulties recruiting and retaining specialist staff. Moreover, widespread competence and training gaps, combined with instances of reactive rather than anticipatory risk management, limit CSOC's ability to demonstrate effective 1st- and 2nd-Line of defence assurance. These pressures are compounded by the higher-level demands of high-level organisational change, Military Strategic Headquarters (MSHQ) alignment activity, and civil service recruitment constraints, which further stretch already limited workforce capacity.

Fuels and Gas audits identified widespread regulatory non-compliance, poor documentation, weak maintenance assurance, and governance failings. Land Systems governance shows signs of improvement following restructuring, but overall assurance remains Limited due to enduring weaknesses in strategic governance, accountability, and equipment lifecycle management as evidenced by ongoing Improvement Notices. Movement and Transport performance is mixed, with strong compliance in static depot environments but significant shortcomings during deployed rail activity. Certification assurance also remains Limited, reflecting shortages in SQEP, immature arrangements for implementing DLSR 600-series requirements, and slow progress in defining certification thresholds and post-certification review. In the maritime domain, minimal improvement has been achieved due to ongoing Integrated Global Defence Network (IGDN) restructuring, unclear accountability, and SQEP shortfalls.

Despite these challenges, CSOC has delivered tangible improvements. The MAA issued a bespoke sandbox clearance, enabling a sub-organisation to rapidly test and field new small Uncrewed Air System capabilities. This was achieved through sustained, proactive engagement between the Board and the Regulator. The creation of a fully resourced Military Training Safety Assurance Team has strengthened risk-focused assurance and the application of Safe Systems of Work. The recruitment of a MySafety coordinator has also improved reporting, investigation, and organisational learning.

From a second line of defence perspective, the full staffing of the Safety Centre has enhanced governance, improved tracking of DSA recommendations, and supported more structured assurance activity. The expansion of the range assurance team also further increases the likelihood of delivering safe outcomes. Nevertheless, the ability to close enforcement actions remains constrained by their scale and overall resourcing demands. CSOC's focus for 2026/27 is therefore rightly centred on strengthening leadership accountability, addressing SQEP shortfalls, improving assurance maturity, and accelerating enforcement resolution through clearer governance and targeted support.

Environmental Protection

Assessed as LIMITED, CSOC demonstrates a predominantly reactive EP culture, persistent shortages of SQEP (particularly in overseas locations), and incomplete assurance of activity or capability environmental impacts. Regulatory and assurance activity continues to highlight weaknesses; DMR raised multiple corrective actions in maritime activity, while DFSR and DLSR identified foam compliance and hazardous waste management issues in the Falkland Islands. CSOC is taking steps to address these issues by strengthening letters of delegation and prioritising the development of Environmental Management Systems (EMS) that properly cover activities and operations rather than estate alone; however, clarity is still lacking on how these arrangements connect into Defence-level governance. Where EP SQEP is absent, there is an over-reliance on contractors to manage environmental risks, without sufficient CSOC oversight to ensure Defence requirements and conditions are consistently met.

The Safety Centre has benchmarked EMS maturity across CSOC and continues to work with sub-organisations to drive improvement. During 2025/26, some sub-organisations demonstrated progress, supported by an increased focus on environmental competence and performance, yet EMS maturity remains weaker than Safety Management Systems, largely due to ongoing challenges in recruiting and retaining competent EP staff. Encouragingly, several sub-organisations have begun targeted specialist environmental training to address competence gaps, which should support movement towards improved assurance. However, this progress is uneven and will need to be replicated across the Command, and reinforced through experience and stronger assurance, before CSOC can collectively prove a more resilient and assured EP system.

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

Safety

Assessed as LIMITED, DE&S has enacted a sustained programme to deliver improvements across the reporting period. Most notable is the development of the first Unified SEMS that has the potential to be an exemplar within Defence. This, alongside delivery of the 2-star owned Route to Moderate programme, has contributed to more stabilised performance with policies, processes and controls for Safe People, Safe Product and Safe Place now largely in place, albeit with further scope for refinement and maturation. While this indicates a positive trajectory, areas of LIMITED assurance remain, particularly in personnel competence, resources and training, and infrastructure.

Ongoing challenges in maintaining sufficient SQEP has created a marked skills-to-task imbalance within DE&S. These pressures are driven by a combination of attrition, recruitment constraints, increasing operational demand, growth in the Equipment Programme, and the effects of organisational change. Across Defence Equipment and Support, this is reflected in strain on critical safety roles and resource capacity not yet fully aligned to demand following restructuring.

Workforce pressures are also contributing to variability in the application of the SEMS and associated assurance outcomes. Evidence from the Defence Maritime Environment highlights that

transition arrangements initially lacked consistent governance, particularly the reduced local control over resources and centralised work attribution. This created variability in safety standards within domains and may have affected delivery outputs. For example, the removal of Operating Centre control over personnel and funding constrained the ability to sustain sufficient SQEP, while capacity-based tasking through Gateway did not always align resource with higher-priority activity. This also extends to the integration of Health, Safety and Environmental Protection requirements for vessels during trials, where responsibilities and assurance mechanisms are still being embedded. Workforce reassignments, including the movement of SQEP personnel into people-coaching roles and the temporary freeze associated with the People Management Model, created short-term gaps in technical assurance capacity and contract oversight.

While these examples highlight friction during transition, subsequent structural adjustments, which includes the re-establishment of senior safety roles and refinement of the operating model, are expected to improve governance coherence and the consistency of safety standards over time. However, mitigating actions to date have largely stabilised existing pressures rather than fully resolving them. This is illustrated by stopping activity to preserve safety at the expense of delivering military capability. As a result, assurance coverage remains variable across maritime, land and air domains. Continued focus on workforce capacity, governance coherence, and the maturity of supporting tools and systems will be important in building on current progress and achieving more consistent and sustained safety performance.

Environmental Protection

Assessed as LIMITED representing a regression from the previous cycle, although accountability and delegation arrangements are assessed as MODERATE. Persistent shortfalls in assurance coverage and environmental SQEP have been exacerbated by the DE&S transformation programme, changes to people management, and wider Defence reorganisation, with Environmental Protection only late in scope but now beginning to stabilise through a unified SEMS within National Armaments Director Group (NADG). Regulatory activity has highlighted non-compliance, including weaknesses in air system environmental case production; insufficient EP priority in land domain assurance; and significant issues in the maritime domain, where risk management levers (for demand, SQEP and assurance) are not consistently aligned with those holding delivery or oversight authority. This culminated in six CAR2s in the Maritime Autonomous and Uncrewed Systems area, relating to concerns around hazardous materials management, assurance maturity, and skills depth.

Notwithstanding these challenges, there are clear signs of improvement, with stronger performance in site acquisition management and assurance in acquisition environmental management, both of which have shown steady improvement since the introduction of JSP 816 assessments in FY23/24. Positive developments include closer alignment with ISO 14001 principles, visible senior commitment to EP, rectification of PFAS compliance in a specific suppression system, improving competence in boats disposal, and incremental strengthening of management arrangements during FY25/26. However, the benefits of these improvements remain constrained by staffing shortfalls, competency gaps, recruitment freezes, and uncertainty over governance ambition following the removal of environmental matters from the remit of the 4* Defence Safety and Environment Committee.

A June-25 DSA High-Level Audit reinforced these findings, identifying a lack of emphasis on, and understanding of, Environmental Protection across DE&S and recommending executive-level EP training to strengthen leadership capability. While no suitable course currently exists, work is underway to develop an executive-level programme across the NADG organisation. The trajectory is cautiously improving, but sustained progress will depend on rebuilding EP capability and capacity, strengthening environmental risk management across acquisition, and clarifying governance, targets and assurance to prevent further regression.

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

Safety

Assessed as LIMITED, the DIO has demonstrated improvements in safety leadership, governance and culture, with increasing maturity of the Safety Management System (SMS). Senior leader engagement has strengthened through the widespread completion of IOSH leadership training and reinforced governance via enhanced Safety Management and Improvement Committee arrangements. Clearer accountability has also been established through H&S Delegations to all leaders and the introduction of individual safety objectives across the workforce. Diving Assurance continues to stand out as a particular strength, delivering consistently high-quality second-line of defence assurance and earning positive regulator feedback. The introduction of horizon scanning, an anonymous reporting system, and improved access to SMS guidance further signal a more proactive and open safety culture.

Despite this progress, significant safety challenges remain, largely driven by resource constraints and uneven implementation of the safety management system. The Defence-wide recruitment pause continues to limit capacity, affecting consistency of leadership, assurance delivery, contractor oversight and organisational learning. Reporting quality and learning from incidents remain variable, and further effort is needed to ensure widespread understanding and effective use of the SMS. Fuels and Gas audits highlighted recurring breaches of key DLSR regulations, pointing to weaknesses in Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) compliance, bulk-LPG infrastructure integrity and second-line assurance. While planned culture surveys and adoption of the HSE Culture Tool should support further improvement, sustained leadership focus and resourcing will be essential for DIO to build on recent gains and progress towards stronger, more consistent safety maturity.

Environmental Protection

Assessed as LIMITED, the DIO is signalling progress in establishing a JSP 816-compliant Environmental Management System (EMS), albeit one that is not yet fully mature. This represents an improvement from the previously UNSATISFACTORY assurance outcome associated with the absence of an EMS. Key structures are now in place, including Environmental Protection (EP) risk capture through the SPRITe tool, an EP improvement committee, and a formal horizon scanning process, providing a stronger framework for identifying and managing risk. However, embedding policies and practices remains challenging, and system effectiveness is not yet fully demonstrable. Environmental incident reporting, investigation, organisational learning, and training provision all

remain underdeveloped, meaning the EMS is credible on paper but not yet fully assured in practice.

EP delivery continues to rely heavily on contractors, which introduces risk where oversight and competence assurance are limited. Although JSP 816-compliant Environmental Management Plans are mandated, contractor competence is not routinely tested, and DIO retains legal accountability for outcomes. Evidence of wildlife and ecological incidents, alongside underutilised reporting systems, indicates gaps in supervision and assurance at the delivery level. While DIO reports that EP requirements are increasingly embedded, through use of the Defence Related Environmental Assessment Method, Environmental Impact Assessments, and integration into governance forums, assurance remains focused more on contractual compliance than demonstrated environmental outcomes.

Resource constraints remain the primary limiting factor. Recruitment controls, including the Defence recruitment pause, have reduced capacity to deliver EMS implementation, assurance activity, and training. This has contributed to ongoing competence gaps and the absence of a consistent organisational learning loop. Nonetheless, there are positive enablers for further progress, including access to EP Subject Matter Experts, structured policy tracking, and centrally available guidance and training materials. Work under Project Venn to clarify roles and responsibilities and assess capability gaps should further strengthen accountability and alignment as the system matures.

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

Safety

Assessed as MODERATE, DSTL demonstrates a well-developed and maturing Safety Management System, underpinned by strong leadership commitment, effective governance, and a positive reporting culture. High levels of maturity are clear in assurance, leadership, infrastructure safety, and incident and emergency management. This is supported by increasingly robust first and second line of defence assurance oversight that has improved consistency, visibility, and control. Established arrangements for policy compliance, information sharing, and performance monitoring further reinforce a strong “tone from the top” and a sustained focus on continuous improvement. Progress has also been made since the last AAR, particularly in strengthening legislative compliance through contracted support.

Despite these strengths, overall SMS maturity is inhibited by several structural weaknesses. These include fragmented competency management, inconsistent delegation letters, outdated or weakly supported safety arguments, role ambiguity linked to organisational change, and safety documentation spread across multiple repositories. These issues create residual risk and limit the coherence of the safety framework, with safety cases remaining the weakest area. In the maritime domain, DSTL continues to be assessed at LIMITED assurance for both Safe to Operate and Operating Safely, supported by ongoing Independent Safety and Environmental Auditor (ISEA) contractor audits. While key SQEP roles such as Accountable Person (AP) and Platform Authority provide continuity during restructuring, the full impact of organisational change on maritime delivery is yet to be realised.

Environmental Protection

Assessed as LIMITED, whilst some elements of EP are trending positively, there are gaps in lifecycle environmental management, competency, and performance measurement. Reliance on contractors is significant, with Environmental Impact Assessments to support trials applied inconsistently, and environmental considerations often overshadowed by safety priorities. Two areas require urgent attention: equipment design, manufacture and maintenance, and infrastructure design, build and maintenance, where weak lifecycle risk management, inconsistent change control, and poor integration of environmental factors into projects have been identified. Common issues across the system include underdeveloped KPIs and metrics, limited proactive environmental improvement, and resource and succession gaps in key environmental roles.

Against this backdrop, there are credible signs of improvement. Environmental accountability is improving, supported by effective second-line of defence assurance in the maritime domain through contracted Independent Safety and Environmental Auditor (ISEA) support. DSTL report that governance and communications are strengthening following recent operating model changes, with clearer organisational roles, improved internal engagement, and greater visibility of environmental responsibilities, albeit still requiring further reinforcement. The introduction of a new Environmental Management System provides a strong foundation, with several elements already trending towards MODERATE as it becomes embedded across the organisation.

3.8 – UK Hydrographic (UKHO) Office – MODERATE Assurance for Safety and LIMITED for Environmental Protection

Safety

Assessed as MODERATE there is clear evidence of improving safety maturity during the reporting year. Transition to the National Armaments Director Group (NADG) ownership has been managed without detriment to safety outcomes, and its safety framework has been strengthened through publication of a comprehensive Safety Management Plan, aligned to recognised risk categories and shared with stakeholders. Progress in defining Terms of Reference for safety-critical and enabling roles has improved clarity of responsibility and accountability, contributing to better governance and increased confidence in UKHO's ability to manage maritime safety risks effectively.

Environmental Protection

Assessed as LIMITED, there are no clearly documented roles, responsibilities, or assurance arrangements for environmental management. EP governance is underdeveloped, with reliance on vacant or temporary posts and a predominant focus on sustainability rather than Defence specific environmental impacts and statutory compliance. There is insufficient permanent EP management capacity, contributing to assurance gaps and delays in the development of Environmental Management Plans. Shortfalls in EP SQEP, alongside the low prioritisation of Defence-relevant environmental risks, remain evident.

3.9 – Oil and Pipelines Agency – SUBSTANTIAL Assurance for Safety and SUBSTANTIAL for Environmental Protection⁶

Safety

Self-assessed as SUBSTANTIAL, the OPA continues to maintain a strong safety record with no significant accidents, major losses of containment, RIDDOR-reportable injuries, or enforcement action in this reporting period. The OPA also continues to demonstrate positive engagement with the Competent Authority through increased regulatory interaction. However, forward-looking risks are emerging, primarily linked to capacity pressures associated with multiple Control of Major Accident Hazards (COMAH) Safety Report submissions, delivery of key programmes such as the Loch Ewe Basic Plant Control System compliance project, and the need to balance major projects with ongoing regulatory requirements. Despite these pressures, safety performance remains stable or improving, supported by a mature COMAH-compliant SEMS, strengthened internal audit arrangements, effective governance and external assurance activity, and targeted workforce enhancements. Collectively, this indicates a positive trajectory in safety maturity and underpins OPA's assessment of substantial assurance, while highlighting the need for continued management focus on delivery resilience.

Environmental Protection

Self-assessed as SUBSTANTIAL, the OPA operates an established Environmental Management System (EMS) that fully meets COMAH Regulations. This has been confirmed by the Competent Authority and incorporates regulatory compliance and monitoring programmes aligned with UK and EU requirements, agreements and permits. All UK Oil Fuel Depots (OFDs) have Environmental Risk Assessments (ERAs) completed in line with Chemical and Downstream Oil Industries Forum (CDOIF) guidance, with three sites reassessed this year to support COMAH Safety Report resubmissions. The EMS is consistently implemented across all six UK depots and includes Environmental Management Programmes with defined objectives and targets, Environmental Aspects and Impacts Registers, containment policy scorecards for secondary and tertiary containment of bulk hazardous liquids. Some Oil Fuel Depots are also subject to Pollution Prevention and Control (PPC) or Environmental Permitting Regulations (EPR) monitoring and reporting, with all required annual and four-yearly submissions completed, and there have been no significant losses of containment (greater than 200 litres) during the reporting period.

⁶ The Oil & Pipelines Agency (OPA) is a Statutory Public Corporation, created under the Oil and Pipelines Act 1985. The OPA UK Operations are not regulated under the Defence Safety Authority or under Defence's Major Accident Control Regulations (MACR). The narrative is from their self-assessment only and therefore they are not included in the DSA assurance table.

Section 4 – Defence Health, Safety and Environmental Protection Themes

4.0 – Section Scope

This section sets out cross-cutting Health, Safety and Environmental Protection (HS&EP) themes informed by multiple sources, including first- and second-line assurance activity such as performance reporting, governance arrangements and organisational self-assessments. This is considered alongside third line assurance provided through independent regulatory activity, investigations and enforcement action by the DSA. Together, these inputs provide an integrated view of organisational performance, highlighting strengths, weaknesses and recurring drivers of risk and non-compliance across Defence. As highlighted in last year's assessment, the assurance landscape continues to be shaped by long-standing and interrelated challenges affecting overall safety and environmental performance.

4.1 - Cross-Cutting Themes

Suitably Qualified and Experienced Personnel

A consistent and Defence-wide issue is the enduring shortage of Suitably Qualified and Experienced Personnel (SQEP), driven by recruitment freezes, workforce churn, restructuring and long-standing resource constraints. These shortfalls affect almost every part of Defence, from nuclear safety case production and engineering authority roles to infrastructure safety, healthcare delivery, air operations, environmental management and fire safety. Misalignment between training, legislation and operational demand, has left Defence with posts that are either gapped, filled by under-qualified personnel, or over-reliant on single-point experts. This fragility means organisations are less able to clearly define requirements, critically challenge suppliers or delivery partners, make informed decisions, and hold others to account for cost, quality, safety, environment and performance. It also weakens 1st and 2nd Line of Defence assurance, and increases reliance on minimum-compliance behaviours rather than confident, risk-based decision-making.

Across the Land, Maritime, Air, Infrastructure and Medical areas, reduced supervisory depth and weakened engineering and professional oversight are directly linked to concerns such as outdated safety and environment cases, repeated maintenance failures, procedural non-adherence and delayed delivery of major programmes. Areas such as nuclear, airworthiness, fire and rescue, environmental protection and healthcare report slower action closure, variable risk assessment quality and reduced resilience - particularly overseas or in complex and emergent capabilities. In several cases, the loss of key SQEP has rendered 2nd Line of Defence assurance untenable, exposing systemic gaps.

Collectively, the lack of SQEP represents a cross-cutting Defence risk with impacts likely to intensify during a transition to conflict. Workforce fragility and constrained recruitment pipelines are eroding institutional knowledge and continuity, creating conditions where compliance is maintained on paper, but not in reality. While pockets of strength exist, the evidence highlights an urgent need

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for enduring pan-Defence action to stabilise the workforce, strengthen competence frameworks and restore supervisory assurance. Defence should also ensure that safety-critical⁷ roles (particularly those that prevent legal non-compliance, regulatory breach and unacceptable risk to people, assets and reputation) are resourced at a level commensurate with Defence's risk exposure and appetite.

Infrastructure

Infrastructure related safety and environmental risks remain significant during this reporting period. This is endemic of an ageing estate, sustained underinvestment, rising maintenance and construction costs, and variable compliance with statutory and regulatory requirements.

Estate condition continues to present stark safety challenges. Legacy construction types and materials remain present within many parts of the older estate. This includes Reinforced Autoclaved Aerated Concrete (RAAC), asbestos-containing materials, historical cladding systems, and deteriorating concrete, all of which require ongoing management and monitoring. Where not adequately controlled, these features can increase risk to personnel and constrain the availability and usability of buildings. In parallel, the condition of some assets presents growing environmental considerations, including localised ground contamination, legacy fuel infrastructure, drainage limitations, and constraints associated with waste management, particularly on overseas sites.

Persistent weaknesses are evident within fuel and gas installations too. Issues relating to ageing infrastructure, legacy system design, variable maintenance standards, and overdue statutory inspections continue to be observed. Given the inherently hazardous nature of fuel and gas systems, delays in inspection, assurance, or remediation can increase risk if not addressed promptly and systematically.

Healthcare infrastructure also remains under pressure. A proportion of medical and dental facilities no longer meet current clinical standards due to ageing fabric, ventilation constraints, unreliable utilities, and legacy layouts. These factors can limit clinical effectiveness and resilience and require careful management to ensure patient safety and statutory compliance are maintained.

Although individual risks can often be clearly identified, ownership and accountability for infrastructure safety and the environment are frequently shared and sometimes fragmented across Commands, Duty Holders, the Defence Infrastructure Organisation (DIO) and funding authorities. Maintenance organisations do not always hold the budgets for the assets they manage, and priorities set by Heads of Establishment can differ from those determined by DIO based on technical and regulatory assessments. Funding is often limited, fragmented, and in some cases outside DIO's direct control; this is a challenge already recognised within DIO's strategic risk profile. These structural constraints, combined with competing operational priorities and delayed modernisation programmes, result in uneven risk exposure across the Defence estate, including deployed and nuclear environments.

⁷ A safety-critical role refers to a position with formal responsibility for safety governance, oversight, assurance or provides competent advice to leaders in their Defence organisation — where their absence or failure of their responsibilities in post could result in legal non-compliance, regulatory breach, or unacceptable risk to people, assets, or reputation.

As a result, infrastructure safety and environmental risk cannot be attributed to a single organisation or decision point. Instead, it reflects a nexus of asset condition, governance arrangements, funding mechanisms, and operational demand. Reducing the overall risk to a sustainable level will require coordinated, cross-enterprise action that aligns risk ownership, investment prioritisation, and delivery capability across Defence.

Novel capabilities and technologies

The rapid introduction of new or novel capabilities and technologies is creating emerging and pervasive safety risks across Defence. This is particularly true where acquisition is accelerated or seeks to bypass established procurement and assurance routes, often by organisations with limited experience, capacity or safety assurance maturity. While this approach enables faster technological insertion, it frequently results in insufficient identification and mitigation of H&S risks. Consequently, capabilities that are non-compliant with legislation are being accepted into service, risks are not demonstrably ALARP, and under-resourced delivery organisations are left to manage safety shortfalls once in they are in service. This drives cost growth, delays, inconsistent assurance and results in operational constraints.

This risk is acutely evident in the rapid expansion of the Defence air environment. The proliferation of Uncrewed Aircraft Systems (especially small UAS) has significantly increased both the size and complexity of the regulated community. Many of these newly incorporated organisations are unfamiliar with aviation regulation and lack mature 1st- and 2nd-Line assurance arrangements, placing disproportionate pressure on 3rd-Line regulators.

The combination of novel technology, accelerated acquisition and weak local assurance is therefore increasing Defence's exposure to safety and EP risk, demanding stronger upfront governance, clearer accountability and earlier integration of safety and EP expertise if future capability growth is to remain safe and environmentally sound.

Medical capabilities

Medical capability is showing gradual improvement in regulatory adherence and in the maturity of its governance and assurance arrangements. Post-intervention audit activity indicates that corrective actions are being implemented with some success, leading to measurable gains in compliance. However, despite this progress, the underlying risk profile remains largely unchanged and, in some respects, is becoming more pronounced. Persistent challenges in digital reliability, infrastructure quality, workforce sustainability, and resource alignment continue to present systemic pressures rather than temporary constraints.

These issues have remained consistent features across multiple reporting periods and continue to limit the overall resilience and sustainability of healthcare delivery. They represent fundamental enablers of safe clinical practice, meaning that any reduction in their effectiveness has a direct and immediate impact on patient safety and the delivery of medical outputs. Although mitigation measures are routinely identified and progressed, they have not yet addressed the root causes or significantly reduced the cumulative level of risk. As a result, weaknesses in these areas continue to manifest as reduced continuity of care, increased exposure to clinical risk, and constrained ability to support operational requirements.

Consequently, the current safety position is maintained less through intrinsic system strength and more through the sustained effort and professionalism of the workforce. While headline compliance metrics suggest a positive trajectory, they risk overstating the resilience of the capability, as safety is often preserved through compensatory behaviours rather than consistently reliable systems. This creates limited tolerance for further degradation, restricts the ability to respond to increased demand, and heightens susceptibility to disruption. In comparison with other capability areas, the tolerance for failure is reduced, as system weaknesses translate quickly into clinical risk. Without sustained progress in strengthening digital systems, infrastructure, workforce capacity, and resource coherence, the overall risk to medical capability is likely to remain elevated and more immediately consequential.

Fire

Across Defence, persistent and systemic weaknesses in fire safety remain evident, particularly in relation to competence, infrastructure, and aspects of contractor performance. These shortcomings present a significant and enduring risk not only to personnel, but also to critical capability and essential infrastructure. Gaps in SQEP continue to affect both delivery and assurance functions, compounded by vacant posts across Defence and within the Defence Fire Safety Regulator (DFSr). Confidence in the quality and consistency of Fire Risk Assessments (FRAs) has yet to fully recover, with limited First and Second Line of Defence assurance reducing the ability to identify and address poor practice at an early stage. While the Defence Fire Safety Leadership Board is driving improvement, infrastructure-related fire risks remain widespread due to the age, condition, and historic underinvestment in the estate. These challenges are consistent across all Military Commands and Defence Infrastructure Organisation (DIO) managed sites.

Within the Fire and Rescue domain, longstanding issues continue to affect both firefighter safety and operational effectiveness, with wider implications for the protection of critical assets and operational outputs. The most significant concern remains the limited availability of Hot Fire Training Simulators (HFTS), which reduces training realism, constrains competence development, and impacts the maintenance of critical skills. This also restricts the ability to conduct mandatory annual foam testing due to effluent capture limitations. Although core competencies are technically maintained, training is often delivered at the minimum acceptable standard, resulting in a workforce that is compliant but lacks depth of experience. In parallel, weaknesses in Task and Resource Analysis (TRA) and Integrated Risk Management Planning mean that fire and rescue resources may not be optimally aligned to credible risks, particularly across non-aerodrome environments.

Taken together, these issues represent a systemic, cross-cutting Defence risk with the potential to impact personnel safety, degrade critical capabilities, and threaten vital infrastructure. The alignment of these weaknesses increases the likelihood of a significant fire incident, consistent with the cumulative failure pathways described in Reason's "Swiss Cheese" model. While statutory fire safety compliance is improving and stakeholder engagement remains positive, the pace of remediation does not yet match the scale or urgency of the risk. Furthermore, current assurance assessments are based on a peacetime operating context; under a Transition to Conflict scenario, the consequences for people, operational capability, and critical infrastructure could be significantly amplified. This reinforces the need for sustained, coordinated leadership focus and targeted investment across Defence.

Environmental Protection

Defence's environmental assurance picture is characterised by improved intent but persistent delivery weaknesses. While environmental culture is developing, it remains less mature than the established safety culture, with inconsistent identification, aggregation and escalation of environmental risk; in sum, this means there is less enterprise level oversight. Longstanding governance weaknesses continue, including fragmented accountability, unclear delegation and limited visibility of risk, making it harder to progress an Environment Function and new climate and environment governance boards to strengthen overall coherence.

Although policy has been refreshed through the first standalone Secretary of State Environmental Protection Policy Statement and updates to JSP 418, assurance activity continues to highlight inconsistent adoption, low awareness and weak record-keeping, exposing Defence to unsatisfactory or limited compliance with key regulatory requirements such as Environmental Principles, waste management, PCBs and PFAS/PFOA controls. As regulatory tolerance for exemptions reduces, these gaps create growing legal, financial and operational exposure, including rising remediation liabilities from PFAS contamination and legacy shipwrecks, reinforcing the need for clearer accountability and sustained leadership focus to close the gap between policy intent and delivery.

Hazardous waste, chemicals and emissions management remain prominent areas of compliance pressure. PFAS, POPs and other hazardous materials pose ongoing challenges, including waste mismanagement overseas, governance gaps in clinical waste handling at some medical facilities, and inconsistent integration of environmental protection considerations in acquisition decisions. Although remediation and substitution programmes, such as PFAS replacement, are progressing, further work is required to standardise practice, strengthen assurance, and embed EP requirements consistently. In parallel, management of noise, air quality and aviation greenhouse gas emissions is improving, particularly within Air Command, but governance through metrics, dashboards and assurance remains uneven.

Overseas environmental protection vulnerabilities highlight the need for clearer accountability and stronger oversight. Findings in locations such as Nepal, Gibraltar, Cyprus and Ascension point to gaps in management arrangements, contractor oversight, fuel handling risks and incomplete EP frameworks, often compounded by host-nation interfaces. While there are examples of good practice, including robust environmental impact assessment and conservation engagement during selected exercises, these lessons are not consistently transferred across the enterprise. Collectively, these themes underline the importance of integrating environmental protection more fully into operational risk, capability decisions, performance discussions and H&S governance.

Annex A – Service Inquiry and Non-Statutory Inquiry Publications

The DSA published 2 SI reports on gov.uk and 1 NSI report in 2025/26, on the following investigations:

- [Service Inquiry into the death of a soldier while driving a MAN Support Vehicle 6 tonne truck near Sennybridge Training Area on 20 September 2023](#)
 - An SI was convened on 24 November 2023 to investigate the death of a service person in an accident while operating a service vehicle near the SENTA in Wales. During the journey, control of the vehicle was lost and the service person received fatal injuries in the accident.
- [Service Inquiry into the injury of a service person while undertaking Royal Marines Close Combat training at His Majesty's Naval Base Clyde on 26 May 2023](#)
 - 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 Royal Marine Close Combat training at HMNB Clyde.
- [Non-Statutory Inquiry into the 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 investigation identified the causal factor to be the high average rate of fire of the HMG. In addition, the panel identified 11 contributory factors, one aggravating factor, and seven other factors.

Annex B - Safety-Related Inquiries and Investigations

New and ongoing Defence Safety Service Inquiries (SI): April 2025 – March 2026:

- **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.
- **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.
- **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.
- **24 May 2025 – Fatality of a service person at Episkopi, Cyprus.** An SI was convened on 30 June 2025 to investigate the death of a service person from the First Battalion, The Princess of Wales's Royal Regiment based in Episkopi Garrison, Sovereign Base Area, Cyprus who was found dead in their single living accommodation. The SI is ongoing.
- **25 January 2026 – Fatality of a service person on Heely Dod Range, Otterburn training area.** An SI was convened on 24 February 2026 to investigate the death of a service person during a night live fire tactical training exercise. The SI is ongoing.

New and ongoing Non-Statutory Inquiries (NSI): April 2025 – March 2026:

- **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.
- **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.
- **7 October 2020 to 13 February 2025 - Potential exposure to hazardous materials in hardened aircraft shelter 8 at RAF Leeming.** Between 7 October 2020 and 13 February 2025 there may have been either unprotected and / or unrecorded exposure to potentially hazardous material in hardened aircraft shelter 8 at RAF Leeming. This NSI is ongoing.
- **11 June 2025 - Civilian fatality involving a Ridgback vehicle near Catterick Garrison.** A civilian riding a mobility scooter was killed in a collision with a Ridgback vehicle on the public highway. This NSI is ongoing.