



Ministry
of Defence

JSP 815 - Annex F

JSP 815 Mapping to ISO 45001 (Element 12)

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Amendment record

JSP 815 has been updated as a part of Defence Reform and will be subject to further scheduled reviews and updated as required.

This Annex has been reviewed by the Directorate of Defence Safety & Support (DDSS) together with relevant subject matter experts and key safety stakeholders. Any suggestions for amendments should be sent to People-DDS-GroupMailbox@mod.gov.uk.

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1.0	Oct 20	BETA version for consultation.	Dir HS&EP
1.1	29 Sep 23	Final version published.	DDS
1.2	10 Sep 24	Removal of reference to Vol 2 with no content changes.	DDS
1.3	1 Sep 26	Scheduled revision and Defence Reform update	Dir-DSS

Terms and definitions

The term 'Defence Area' refers to one of the four top-level areas of Defence: Department of State (DOS), Armed Forces (MSHQ and Military Commands), National Armaments Director (NAD) Group and the Defence Nuclear Enterprise (DNE). Within Defence Safety Policy (JSP 815, JSP 375 and JSP 376), reference to a 'Defence Area' responsibility applies to the top-level Defence Area however, for the Armed Forces it also applies to their component Military Commands (Army, Air, Navy and CSOC).

General safety terms and definitions are provided in the [Master Glossary of Safety Terms and Definitions](#) which can also be accessed on [GOV.UK](#).

Introduction

The mapping of the JSP 815 Elements and Expectations against the ISO 45001 clauses along with a description of the ISO 45001 clauses can be seen in the following table.

JSP 815 - Defence SMS framework	ISO 45001 clause	Description in ISO 45001
E1.1 Leadership sets the 'tone from the top' and actively demonstrate their commitment to safety.	5.1	Top management shall demonstrate leadership and commitment with respect to a Health and Safety management system.
E1.2 Leadership promote a culture of continual improvement, speaking up and embedding transparent and open reporting.	5.1(h)	Ensuring and promoting continual improvement.
E1.3 Leadership sets clear safety responsibilities by which the Defence Area is measured and held to account.	5.1(a)	Leadership taking overall responsibility and accountability for the prevention of work-related injury and ill health, as well as the provision of the safe and healthy workplace and activities.
E1.4 Leadership is visible at all levels of the Defence Area; including through direct interactions with the wider workforce and other stakeholders on matters of safety.	5.1(l) (g)	(l) Ensuring the organisation establishes and implements a process for consultation and participation of workers. (g) directing and supporting persons to contribute to the effectiveness of the Health and Safety management system.
E1.5 Corporate Governance holds safety as an equal partner to other strategic objectives such as capability, cost and schedule.	5.1(c)	Ensuring the integration of the OH&S management system requirements into the organisation's business processes.
E1.6 A culture is in place which fosters resilient safety management, engages people and promotes effective safety behaviours.	5.1(l)(k)	(l) Ensuring the organisation establishes and implements a process for consultation and participation of workers. (k) protecting workers from reprisal when reporting incident, hazards, risks and opportunities.
E2.1 Defence Areas develop and maintain safety management arrangements that are specific to their area of responsibility. It sets out how the Defence Safety Management System (SMS) and underpinning policy and regulations will be delivered in a way specific to the Defence Area.	4.3	Determining the scope of the Health and Safety management system.

E2.2 The Defence Area defines its safety roles, responsibilities, and accountabilities in its safety management arrangements.	5.3	Top management shall ensure that the responsibilities and authorities for relevant roles within the OH&S management system are assigned and communicated at all levels within the organisation and maintained as documented information. Workers at each level of the organisation shall assume responsibility for those aspects of the OH&S management system over which they have control. NOTE While responsibility and authority can be assigned, ultimately top management is still accountable for the functioning of the OH&S management system.
E2.3 The Defence Area has a system in place to allocate appropriate resources (i.e., budget and people).	7.1	The organisation shall determine and provide the resources needed for the establishment, implementation, maintenance, and continual improvement of the OH&S management system.
E2.4 The Defence Area has arrangements in place to share information about safety risks, supporting effective risk management and continual improvement.	7.4	The organisation shall establish, implement and maintain the process(es) needed for the internal and external communications relevant to the OH&S management system, including determining: a) on what it will communicate, b) when to communicate; c) with whom to communicate; internally among the various level and functions, among contractors and visitors and other interested parties. d) how to communicate.

E2.5 The Defence Area checks that standards of safety management of its contractors and suppliers meet or exceed Defence standards.	8.1.4.2	The organisation shall coordinate its procurement process(es) with its contractors, in order to identify hazards and to assess and control the OH&S risks arising from: a) the contractors' activities and operations that impact the organisation; b) the organisation's activities and operations that impact the contractors' workers; c) the contractors' activities and operations that impact other interested parties in the workplace. The organisation shall ensure that the requirements of its OH&S management system are met by contractors and their workers. The organisation's procurement process(es) shall define and apply occupational health and safety criteria for the selection of contractors.
E2.6 The Defence Area has mechanisms for joint consultation with the workforce, contractors and supply chain.	5.4	The organisation shall establish, implement, and maintain a process(es) for consultation and participation of workers at all applicable levels and functions, and, where they exist, workers' representatives, in the development, planning, implementation, performance evaluation and actions for improvement of the OH&S management system.
E2.7 Changes to an organisational structure or changes to personnel with specific knowledge or experience are evaluated, risk assessed, approved and documented.	8.1.3	The organisation shall establish a process(es) for the implementation and control of planned temporary and permanent changes that impact OH&S performance, including: a) new products, services and processes, or changes to existing products, services and processes, including: — workplace locations and surroundings; — work organisation; — working conditions; — equipment; — work force; This is broader than only change in the personnel.

E2.8 Mechanisms are in place to identify functional and organisational dependencies and interfaces, and how safety risks are managed across these.	8.1	Operational planning and control. At multi-employer workplaces, the organisation shall coordinate the relevant parts of the OH&S management system with the other organisations.
E3.1 The Defence Area has mechanisms in place to maintain compliance with Defence safety policy, legislation and Defence regulations, and to identify and assess the impact of emerging safety legislation.	6.1.3 9.1.2	6.1.3 Determination of legal requirements and other requirements. The organisation shall establish, implement and maintain a process(es) to: a) determine and have access to up-to-date legal requirements and other requirements that are applicable to its hazards, OH&S risks and OH&S management system; b) determine how these legal requirements and other requirements apply to the organisation and what needs to be communicated; c) take these legal requirements and other requirements into account when establishing, implementing, maintaining and continually improving its OH&S management system. The organisation shall maintain and retain documented information on its legal requirements and other requirements and shall ensure that it is updated to reflect any changes. 9.1.2 The organisation shall establish, implement and maintain a process(es) for evaluating compliance with legal requirements and other requirements.
E3.2 The Defence Area's policy and guidance is consistent and does not conflict with the Defence SMS.	8.1 A5.2	8.1 At multi-employer workplaces, the organisation shall coordinate the relevant parts of the OH&S management system with the other organisations. A5.2 In developing its OH&S policy, an organisation should consider its consistency and coordination with other policies.

E3.3 The Defence Area has mechanisms in place to communicate with internal and external stakeholders the requirement to comply with safety legislation, Defence policy and guidance, and Defence regulations.	7.4.1	The organisation shall establish, implement and maintain the process(es) needed for the internal and external communications relevant to the OH&S management system. When establishing its communication process(es), the organisation shall: — take into account its legal requirements and other requirements; — ensure that OH&S information to be communicated is consistent with information generated within the OH&S management system, and is reliable.
E3.4 Policies and guidance are reviewed regularly to reflect any significant changes.	9.3	Top management shall review the organisation's OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness
E3.5 The Defence Area has a process in place to manage exemptions from statutes, and exemptions / waivers / concessions from Defence regulations.	6.1.3	Determination of legal requirements and other requirements.
E4.1 The Defence Area has mechanisms in place to assess its risk profile and identify its safety hazards.	6.1.2.1	The organisation shall establish, implement and maintain a process(es) for hazard identification that is ongoing and proactive.
E4.2 The Defence Area has mechanisms in place to manage its safety risks, including provision of proportionate controls.	6.1.2.2	The organisation shall establish, implement and maintain a process(es) to: a) assess OH&S risks from the identified hazards, while taking into account the effectiveness of existing controls; b) determine and assess the other risks related to the establishment, implementation, operation and maintenance of the OH&S management system
E4.3 Those responsible for the control of activity have a mechanism in place to assess and elevate risk where necessary and leadership are actively involved in the risk management.	5.3	Top management shall ensure that the responsibilities and authorities for relevant roles within the OH&S management system are assigned and communicated at all levels within the organisation and maintained as documented information.

		Workers at each level of the organisation shall assume responsibility for those aspects of the OH&S management system over which they have control.
E4.4 The Defence Area has arrangements in place to communicate safety risk to all stakeholders, outlining control measures needed to provide safe working practices.	7.4.2 5.4	7.4.2 The organisation shall: a) internally communicate information relevant to the OH&S management system among the various levels and functions of the organisation, including changes to the OH&S management system, as appropriate; b) ensure its communication process(es) enables workers to contribute to continual improvement. 5.4 The organisation shall establish, implement and maintain a process(es) for consultation and participation of workers at all applicable levels and functions, and, where they exist, workers' representatives, in the development, planning, implementation, performance evaluation and actions for improvement of the OH&S management system. 5.4.(e) Emphasize the participation of non-managerial workers in the following: 1) determining the mechanisms for their consultation and participation; 2) identifying hazards and assessing risks and opportunities. 3) determining actions to eliminate hazards and reduce OH&S risks

E4.5 The Defence Area has mechanisms in place to continually improve risk management with the aim of eliminating fatalities whilst enhancing Defence capability and minimising injury.	10.1 6.1.2.2	The ISO standard discusses continual improvement in almost all sections. 10.1 Improvement- The organisation shall determine opportunities for improvement (see Clause 9) and implement necessary actions to achieve the intended outcomes of its OH&S management system. 6.1.2.2 Assessment of OH&S risks and other risks to the OH&S management system. The organisation's methodology(ies) and criteria for the assessment of OH&S risks shall be defined with respect to their scope, nature and timing to ensure they are proactive rather than reactive and are used in a systematic way.
E4.6 The Defence Area tracks changes, such as those impacting equipment, operations, infrastructure, training, people, plans and procedures, and takes action to manage associated risk.	8.1.3	The organisation shall establish a process(es) for the implementation and control of planned temporary and permanent changes that impact OH&S performance, including: a) new products, services and processes, or changes to existing products, services and processes, including: — workplace locations and surroundings; — work organisation; — working conditions; — equipment; — work force; b) changes to legal requirements and other requirements; c) changes in knowledge or information about hazards and OH&S risks; d) developments in knowledge and technology. The organisation shall review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary.

E4.7 A safety case is developed, maintained and reviewed where required to demonstrate that safety risks associated with complex systems and activities are being managed to a level that is ALARP and tolerable.	6.1.2.1 6.1.2.2 8.1.2	6.1.2.1 The organisation shall establish, implement and maintain a process(es) for hazard identification that is ongoing and proactive. 6.1.2.2 Assessment of OH&S risks and other risks to the OH&S management system. The organisation's methodology(ies) and criteria for the assessment of OH&S risks shall be defined with respect to their scope, nature and timing to ensure they are proactive rather than reactive and are used in a systematic way. 8.1.2 Eliminating hazards and reducing OH&S risks. The organisation shall establish, implement and maintain a process(es) for the elimination of hazards and reduction of OH&S risks using the following hierarchy of controls: a) eliminate the hazard; b) substitute with less hazardous processes, operations, materials or equipment; c) use engineering controls and reorganisation of work; d) use administrative controls, including training; e) use adequate personal protective equipment.
E5.1 The Defence Area has mechanisms in place to delegate authority for the control of activity.	5.3	Top management shall ensure that the responsibilities and authorities for relevant roles within the OH&S management system are assigned and communicated at all levels within the organisation and maintained as documented information. Workers at each level of the organisation shall assume responsibility for those aspects of the OH&S management system over which they have control.

E5.2 Those holding delegation of authority are trained and competent to discharge their responsibilities and accountabilities.	7.2	Competence The organisation shall: a) determine the necessary competence of workers that affects or can affect its OH&S performance; b) ensure that workers are competent (including the ability to identify hazards) on the basis of appropriate education, training or experience; and c) where applicable, take actions to acquire and maintain the necessary competence, and evaluate the effectiveness of the actions taken.
E5.3 Where safety risks are significant, these risks are elevated, and leadership are actively involved in their management.	9.3, 5.1, 7.4.2	No specific clause for this, but this can be put under the management review section 9.3 , under leadership and commitment section 5.1 and 7.4.2 Internal communication (a) internally communicate information relevant to OH&S management system among the various levels and functions of the organisation.
E5.4 Delegated authority should be formally appointed via a letter of delegation.	5.3	covered in above section.
E5.5 Those responsible for the control of activity have a duty to mitigate risk to as low as reasonably practicable (ALARP) and tolerable.	8.1.2	Eliminating hazards and reducing OH&S risks. The organisation shall establish, implement and maintain a process(es) for the elimination of hazards and reduction of OH&S risks using the following hierarchy of controls: a) eliminate the hazard; b) substitute with less hazardous processes, operations, materials or equipment; c) use engineering controls and reorganisation of work; d) use administrative controls, including training; e) use adequate personal protective equipment.
E5.6 Those responsible for control of activity have the authority to pause or cease activity where a risk is no longer ALARP and tolerable.	5.3	Included in 5.3 see above.

E5.7 The Defence Area has developed and implemented Safe Systems of Work (SSW), to safeguard those carrying out the work or affected by it.	8.1	8.1.1 General The organisation shall plan, implement, control and maintain the processes needed to meet requirements of the OH&S management system, and to implement the actions determined in clause 6.
E6.1 The Defence Area has sufficient resources in place aligned to its risk profile.	7.1	The organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the OH&S management system.
E6.2 The Defence Area has defined responsibilities, accountabilities and delegations for safety management.	5.3	Top management shall ensure that the responsibilities and authorities for relevant roles within the OH&S management system are assigned and communicated at all levels within the organisation and maintained as documented information. Workers at each level of the organisation shall assume responsibility for those aspects of the OH&S management system over which they have control for the functioning of the OH&S management system. Top management shall assign the responsibility and authority for: a) ensuring that the OH&S management system conforms to the requirements of this document; b) reporting on the performance of the OH&S management system to top management.
E6.3 The Defence Area has plans in place to support recruitment, deployment, career development, retention and succession of its people.	7.2	7.2 Competence The organisation shall: a) determine the necessary competence of workers that affects or can affect its OH&S performance; b) ensure that workers are competent (including the ability to identify hazards) on the basis of appropriate education, training or experience; c) where applicable, take actions to acquire and maintain

		the necessary competence, and evaluate the effectiveness of the actions taken.
E6.4 Training programmes are in place that include safety skills, enabling the workforce to meet Defence requirements.	7.2	as above.
E6.5 A competency process is in place to assess and assure qualifications, behaviours, skills of the workforce to meet Defence safety requirements.	7.2	as above.
E7.1 The Defence Area has mechanisms in place to identify and assess safety risks and requirements associated with equipment throughout its entire lifecycle; from Concept, Assessment, Demonstration, Manufacture, In-service and Disposal (CADMID).	A6.1.1	No details about life cycle in the main standard, it talks about procurement of product and services but not the equipment, but in guidance document in Annex-A of the standard A6.1.1 it talks about life cycle example. Integrating occupational health and safety requirements at the earliest stage in the life cycle of facilities, equipment or process planning for facilities relocation, process re-design or replacement of machinery and plant.
E7.2 The Defence Area has mechanisms in place to ensure that equipment safety cases are developed, maintained, and used to identify, evaluate, control and mitigate risks throughout the CADMID/T lifecycle and where necessary elevated to the appropriate Duty Holder (if applicable), Senior Responsible Owner (SRO) and competent person.	8.1.4.1	The organisation shall establish, implement and maintain a process(es) to control the procurement of products and services in order to ensure their conformity to its OH&S management system.
E7.3 The Defence Area has mechanisms in place to ensure equipment is compliant with statute and Defence regulation throughout its lifecycle. Where necessary, an exemption /waiver/ concession is in place where compliance is not achievable.	6.1.3	Not specific to equipment but it can be covered under 6.1.3 Determination of legal requirements and other requirements.

E7.4 The Defence Area has processes in place to ensure equipment is always maintained and operated within defined design and operating limits. Mechanisms are in place to communicate these operating limits to those who operate and maintain equipment.	A8.1	A8.1. Operational planning and control. 8.1.1.(c) Establishing preventive or predictive maintenance and inspection programme.
E7.5 The Defence Area has mechanisms in place to ensure physical changes to equipment, (including major software changes), materials and associated specifications are evaluated, risk assessed, approved, and documented.	A8.1.3	A8.1.3 Management of change The objective of a management of change process is to enhance occupational health and safety at work, by minimizing the introduction of new hazards and OH&S risks into the work environment as changes occur (e.g., with technology, equipment, facilities, work practices and procedures, design specifications, raw materials, staffing, standards or regulations). Depending on the nature of an expected change, the organisation can use an appropriate methodology(ies) (e.g., design review) for assessing the OH&S risks and the OH&S opportunities of the change. The need to manage change can be an outcome of planning.
E7.6 The Defence Area has mechanisms to accurately identify and manage the Health and Safety risks and dependencies in their equipment supply chain.	A8.1.4.1	A8.1.4.1 Procurement The organisation should verify that equipment, installation and materials are safe for use by workers by ensuring: a) equipment is delivered according to specification and is tested to ensure it works as intended; b) installations are commissioned to ensure they function as designed; c) materials are delivered according to their specifications; d) any usage requirements, precautions or other protective measures are communicated and made available.

E7.7 Lessons learned from previous equipment design, acquisition, manufacture, operation, modification and maintenance activities are shared effectively across the Defence Area.	7.4.2 (a)	7.4.2 Internal communication. The organisation shall: a) internally communicate information relevant to the OH&S management system among the various levels and functions of the organisation, including changes to the OH&S management system, as appropriate.
7.8 The Defence Area has mechanisms in place to assess the risk from integration of equipment and systems and its effects on platform safety.	A8.1.3	The objective of a management of change process is to enhance occupational health and safety at work, by minimizing the introduction of new hazards and OH&S risks into the work environment as changes occur.
E8.1 The Defence Area has mechanisms in place to identify and assess safety risks and requirements associated with infrastructure throughout its entire lifecycle; from Concept, Assessment, Design, Manufacture and Construction, Use, Maintenance and Disposal.		Element 8 is specific for infrastructure design, build and maintenance. ISO does not have such specific requirements related to infrastructure, but it covers it through general element of the management system design.
E8.2 The Defence Area has mechanisms to ensure risks associated with infrastructure are adequately controlled and mitigated through its entire lifecycle and where necessary elevated to the appropriate duty holder, SRO, head of establishment, and competent person.		
E8.3 The Defence Area has mechanisms in place to ensure infrastructure is compliant with statute or Defence regulation throughout its lifecycle. Where necessary, an exemption /waiver/ concession is in place where compliance is not achievable.		
E8.4 The Defence Area has processes in place to ensure infrastructure is maintained and operated within defined design intent. Mechanisms are in place to communicate these processes to workforce that operate and maintain the infrastructure.		

E8.5 The Defence Area has mechanisms in place to ensure physical changes to infrastructure, (including major software changes), materials and associated specifications are evaluated, risk assessed, approved and documented.		
E8.6 The Defence Area has mechanisms to accurately identify and manage the safety risks and dependencies in its infrastructure supply chain.		
E8.7 Lessons learned from previous infrastructure design, acquisition, build, operation, modification, and maintenance activities are shared effectively across the Defence Area.		

E9.1 The Defence Area has effective systems and processes in place to collect, measure and monitor safety performance, using documented leading, lagging, and cultural performance indicators.	9.1	The organisation shall establish, implement and maintain a process(es) for monitoring, measurement, analysis and performance evaluation. The organisation shall determine: a) what needs to be monitored and measured, including: - the extent to which legal requirements and other requirements are fulfilled - its activities and operations related to identified hazards, risks and opportunities; - progress towards achievement of the organisation's OH&S objectives; - effectiveness of operational and other controls; b) the methods for monitoring, measurement, analysis and performance evaluation, as applicable, to ensure valid results; c) the criteria against which the organisation will evaluate its OH&S performance; d) when the monitoring and measuring shall be performed; e) when the results from monitoring and measurement shall be analysed, evaluated and communicated. The organisation shall evaluate the OH&S performance and determine the effectiveness of the OH&S management system.
E9.2 The Defence Area regularly reviews performance and conducts trend analysis to inform decisions and implement plans to correct performance deficits.	9.1	same as above
E9.3 The Defence Area has mechanisms in place to produce, report and review the management information from performance indicators and trend analysis; acting on it in a timely manner.	9.3	Top management shall review the organisation's OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness.

E9.4 Leadership decisions around cost, schedule and military capability performance are data driven, including assessment of potential safety impact.		Could not find anything related to data driven decision.
E10.1 The Defence Area promotes a culture of open reporting of mistakes, accidents, incidents and near-misses that occur.	5.1(k) 10.2	5.1(k) Top management shall demonstrate commitment related to protecting workers from reprisals when reporting incidents, hazards, risks and opportunities. 10.2 The organisation shall establish, implement and maintain a process(es), including reporting, investigating and taking action, to determine and manage incidents and nonconformities.
E10.2 The Defence Area has a system in place which is consistent with the Defence policy to record and report accidents, incidents and near misses from initial submission to close-out, allowing for effective investigation and resolution.	10.2	10.2 The organisation shall establish, implement and maintain a process(es), including reporting, investigating and taking action, to determine and manage incidents and nonconformities.
E10.3 The Defence Area has resources in place to investigate accidents, incidents and near misses.	10.2	As above, more details are in section 10.2 of standard.
E10.4 The Defence Area has systems in place to implement the corrective actions and learning from accidents, incidents and near misses to drive continual improvement.	10.2	Evaluate, with the participation of workers and the involvement of other relevant interested parties, the need for corrective action to eliminate the root cause(s) of the incident or nonconformity, in order that it does not recur or occur elsewhere, by: 1) investigating the incident or reviewing the nonconformity; 2) determining the cause(s) of the incident or nonconformity; 3) determining if similar incidents have occurred, if nonconformities exist, or if they could potentially occur.
E10.5 Emergency and business continuity plans are in place, tested regularly and consider safety matters.	10.3	10.3 Continual improvement communicating the relevant results of continual

		improvement to workers, and, where they exist, workers' representatives.
	8.2	8.2 Emergency preparedness and response. The organisation shall establish, implement and maintain a process(es) needed to prepare for and respond to potential emergency situations.
E11.1 The Defence Area has mechanisms in place to identify internal and external stakeholders and understand their role and purpose in safety matters.	4.2	4.2 Understanding the needs and expectations of workers and other interested parties. The organisation shall determine: a) the other interested parties, in addition to workers, that are relevant to the OH&S management system; b) the relevant needs and expectations (i.e. requirements) of workers and other interested parties; c) which of these needs and expectations are, or could become, legal requirements and other requirements.
E11.2 The Defence Area has mechanisms in place to manage and engage with stakeholders and to consult on safety matters, including with the workforce, trade unions, suppliers, contractors, and others affected by the organisation's activities.	7.4.1	7.4.1 Communication The organisation shall establish, implement and maintain the process(es) needed for the internal and external communications relevant to the OH&S management system, including determining: a) on what it will communicate; b) when to communicate; c) with whom to communicate: - internally among the various levels and functions of the organisation; - among contractors and visitors to the workplace; - among other interested parties.
E11.3 The Defence Area works with its stakeholders to build effective working relations to drive continual improvement in safety.	5.4 4.2	5.4 Consultation and participation of workers. 4.2 Understanding the needs and expectations of workers and other interested parties.

E11.4 The Defence Area has mechanisms in place to allow all people, contractors, and the supply chain to easily access up to date safety information relevant to their roles.	4.2 5.4	Not specific about building working relationship with stakeholder but while understanding needs and expectations of the interested parties, some of expectations become other requirement. 5.4 consultation and participation of workers.
E11.5 The Defence Area has mechanisms in place to enable people to anonymously raise safety related concerns.	7.4.2 5.1(k)	ISO Standard don't have specific about anonymously raising safety related concern but it can be covered under 7.4.2 Internal communication. The organisation shall: a) internally communicate information relevant to the OH&S management system among the various levels and functions of the organisation, including changes to the OH&S management system, as appropriate; b) ensure its communication process(es) enables workers to contribute to continual improvement. 5.1.(k) – Protecting workers from reprisals when reporting incidents, hazards, risks and opportunities.
E12.1 The Defence Area has mechanisms in place to conduct a risk-based 1st Line of Defence (1LOD) assurance (appropriate to its scale and complexity).	9.2.2	9.2.2 Internal audit programme, The organisation shall: a) plan, establish, implement and maintain an audit programme(s) including the frequency, methods, responsibilities, consultation, planning requirements and reporting, which shall take into consideration the importance of the processes concerned and the results of previous audits; b) define the audit criteria and scope for each audit; c) select auditors and conduct audits to ensure objectivity and the impartiality of the audit process; d) ensure that the results of the audits are reported to relevant managers; ensure that relevant audit results are reported to workers, and, where they exist, workers' representatives, and other relevant interested parties; e) take action to address nonconformities and continually

		improve its OH&S performance; f) retain documented information as evidence of the implementation of the audit programme and the audit results.
E12.2 The Defence Area has mechanisms in place to enable 2LOD and 3LOD assurance and support external assurance.		Third party audit conducted by UKAS Accredited certification body
E12.3 The Defence Area conducts an annual self-assessment against the elements of the Defence SMS and provides this to Area al leadership to identify opportunities for improvement and help inform the generation of the annual assurance report submission.	9.3	9.3 Management review Top management shall review the organisation's OH&S management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Management review includes audit results and opportunities for continual improvement.
E12.4 The Defence Area's leadership formally review the effectiveness of their safety management arrangements in meeting organisational objectives based on the assurance activity that has been undertaken.	9.3	same as above.
E12.5 The Defence Area has mechanisms in place to ensure that corrective action is taken to address Defence and statutory regulator enforcements actions.	10.2	10.2 Incident, nonconformity and corrective action The organisation shall establish, implement and maintain a process(es), including reporting, investigating and taking action, to determine and manage incidents and nonconformities.