



Ministry
of Defence

Defence Safety Function Operating Model



1 September 2026

Foreword

Delivering Defence outputs is inherently demanding. It places our people in complex and, at times, high risk environments where hazards cannot be wholly eliminated. In this context, safety is not a constraint on Defence activity; it is a critical enabler of it.

A robust and effective safety system allows Defence to operate with confidence, ensuring that risk is understood, controlled and communicated at every level.

By embedding safety into how we plan, decide and act, we protect our people from harm, preserve our operational capability, and sustain the trust placed in us by our allies, the public and Parliament. Safety therefore underpins readiness, resilience and the successful delivery of Defence outcomes.

This Defence Safety Function Operating Model sets out how we organise ourselves to achieve this. It provides a coherent, pan-Defence framework that defines how safety is led, governed, assured and continuously improved across all Defence activity, wherever it takes place. It aligns policy, structures, processes and behaviours to ensure that risks arising from our activities are managed effectively and reduced to levels that are as low as reasonably practicable and tolerable.



Ultimately, while structures and processes are essential, it is our culture and behaviours that determine how effectively safety is realised in practice. Every individual - be they military, civilian or contractor - has a role to play in recognising hazards, speaking up, and taking personal responsibility for safe outcomes.

This Operating Model reinforces our collective commitment to making safety integral to everything we do. By doing so, we enable Defence to operate decisively, responsibly and sustainably in pursuit of its mission.

Emma Austen
Director Defence Safety and Support
Defence Safety Function Lead

PURPOSE

The Safety Function Operating Model details how the Defence Safety Function operates within the Ministry of Defence (MOD), including:

- structures and accountabilities
- governance arrangements
- core policies and processes owned by the Function
- people requirements of the Function
- data that will be required and provided by the Function
- technology to be used
- culture and behaviours to be exhibited

It replaces the previous Defence Safety Function Operating Model, dated 1 April 2024.

The Operating Model should be read alongside Joint Service Publication (JSP) 815, which is the Defence Safety Management System (SMS) and provides the framework, direction and guidance to enable Defence Areas to develop and operate safety management arrangements appropriate to their activities.

SCOPE

This Defence Safety Function Operating Model sets out the pan-Defence framework to ensure health and safety is embedded and appropriately applied across MOD, with risks identified and managed in line with the Defence Plan and JSP 815.

The Defence Safety Function Operating Model and Directorate of Defence Safety and Support-owned safety policy:

- applies to all those employed by Defence (military and civilian) including those under the age of 18 (for example recruits and apprentices).
- applies to those working on behalf of, or under the supervision of Defence (for example, contractors or visitors).
- applies to all Defence activities carried out in any location (UK or overseas).
- is not written for young persons in the cadet forces, Defence-run schools, nurseries and so on; those organisations must maintain their own safety policies and governance and must provide statutory compliant infrastructure and appropriate safe systems of work. They may use Defence Safety policy as a reference point, but where appropriate their respective policies should be adapted to meet the needs of young persons and to follow any applicable Department for Education guidelines or legislation.

Area specific safety arrangements are set out in the respective Area Operating Models.

TERMS AND DEFINITIONS

The term 'safety' is used throughout this Operating Model and is defined as the state of being protected from danger or harm. Safety in this context encompasses health by providing safe systems of work and or training, including safe places, people, practice and equipment, thus protecting people from harm and ill-health. However, there will be some references to health and safety where statute (for example the Health and Safety at Work etc Act 1974 (HSWA74)) or Defence policy and regulation defines them.

'Wellbeing' is an adjacent policy area and is an aspect of the People Function.

The term 'Defence' refers to the Ministry of Defence (MOD) and will be referred to from this point forward.

The term 'Defence Area' refers to the four Areas of the MOD. These are the Department of State, Armed Forces (Military Strategic Headquarters and Military Commands), National Armaments Director Group and the Defence Nuclear Enterprise. The four Military Commands (Army, Royal Air Force, Royal Navy, and Cyber and Specialist Operations Command) and the Military Strategic Headquarters fall under the Armed Forces.

'Senior Leaders of the four Defence Areas' is the collective term for general safety leadership and accountability within a Defence Area. Executive Duty Holder (EDH) is used only in relation to specific Duty Held activities, where EDH accountability applies by virtue of formal appointment for that activity and operates in accordance with JSP 815.

The term Duty Holding (DH) refers to a Defence risk management construct, set out in JSP 815, which can be applied to high-risk military activities to enhance that Duty of Care held by the SofS. Duty Holding aligns safety risk accountability with the authority, resources and escalation routes required to manage that risk effectively.

The term Executive Duty Holder (EDH) refers, by virtue of their appointment, to a senior leader for specific activities under Duty Holding arrangements. EDH status is activity specific and must not be used as a universal label for senior leaders or for general Defence Area safety responsibilities.

The term Senior Duty Holder (SDH) refers to an individual appointed under the Duty Holding construct to hold senior accountability for the safe conduct of a defined activity, reporting to the EDH.

The terms 'Defence activity' or 'activity' are defined as an activity delivered by a person(s) employed by Defence (military and civilian) or working on behalf of, or under the supervision of Defence (for example, contractors) with the intention of providing benefit to Defence.

Activity risk refers to risk arising from the conduct of Defence activity, managed through Defence Areas and governed in line with Figure 2.

Safety function risk refers to risk relating to the effectiveness of the Defence Safety Function, including policy, systems, capability and assurance.

Contents

1. Defence Safety Function	5
2. Structures	6
2.1 Departmental	6
2.2 Safety Function	6
2.3 Four Defence Areas	7
2.4 Accountability for safety in Defence	7
2.5 The Defence Safety Authority	8
3. Governance	9
3.1 Defence Board	9
3.2 Defence Safety Committee	9
3.3 Defence Audit and Risk Committee	11
3.4 Safety Function Leadership Group	11
3.5 Nuclear governance	11
4. Processes	13
4.1 Defence Safety Function-owned policy	13
4.2 Defence Regulation	15
4.3 Area safety arrangements	16
4.4 Core processes	17
4.5 Key controls	18
4.6 Stakeholder engagement	20
5. Risk and assurance	21
5.1 Overview	21
5.2 Activity risk	21
5.3 Mandatory risk escalation and funding alignment for safety risk mitigation	22
5.4 Activity assurance	23
5.5 Safety Function risk	24
5.6 Function assurance	24
5.7 Risk convergence and coherence	25
5.8 External assurance	25
6. People	26
6.1 Safety and Environment Profession	26
6.2 Cultivating and managing talent	26
6.3 Training	27
6.4 Recruitment	27
6.5 Strategic workforce planning	27
7. Data and technology	28
8. Culture	28

1. Defence Safety Function

The Defence Safety Function encompasses the safety management structure and processes which enable Defence to deliver operational capability whilst minimising the risk to Defence personnel and equipment. Thus, supporting Defence in achieving a proactive safety culture that protects our people, enhances operational capability, and strengthens national security.

It is led by the Director Defence Safety and Support (Dir-DSS), on behalf of the Director General (DG) People, the Defence Safety Function Owner.

The Defence Safety Function is responsible for:

- Setting and maintaining policy for the safe delivery of Defence business, including the Defence Safety Management System (SMS), in consultation with the four Defence Areas.
- Cohering and providing direction of Safety Function risks and insight on Function performance that feeds the Defence Board Principal Risk.
- Maintaining the framework against which assurance across Defence activities is conducted.
- Second Line of Defence assurance against the Defence SMS and compliance with Dir-DSS owned policies.

Coherence of digital capabilities for the management of safety across Defence aligned with Defences overarching digital strategy.

- Giving safety strategic direction to Defence Areas and driving continual improvement.
- Providing a framework to ensure safety is considered during acquisition activities
- Defining the skills and capabilities required by the Safety Function and sponsoring any relevant safety training.
- Managing the Safety and Environment Profession with the support of the Director Energy, Environment and Infrastructure.

2. Structures

2.1 Departmental

The Secretary of State for Defence (SofS) is accountable to Parliament for safety in the MOD. The SofS's Health and Safety Policy Statement, provides the top-level authority for safety policies, our broader approach to safety within Defence and our approach to legislative compliance. It sets out what is required from senior leaders, individuals, commanders and line managers.

The SofS may choose to delegate day to day ministerial oversight of Defence's safety management to a junior Minister.

The SofS appoints the Permanent Secretary (PUS) to oversee the Defence SMS on his behalf. The PUS is accountable to the SofS for ensuring effective safety management arrangements are in place to comply with the SofS's Health and Safety Policy Statement and applicable legislation.

The Dir-DSS is the department's senior appointed, formally safety qualified, competent person on all safety policy matters, as required by Regulation 7 of The Management of Health and Safety at Work Regulations 1999. The Dir-DSS is responsible for managing the overarching Defence SMS on behalf of the PUS.

2.2 Safety Function

All functions in Defence are managed by a framework of Function Owners, with specific authorities and accountabilities for developing and implementing Function Strategies and Function Operating Models.

Function Owners may also be supported by a Function Lead.

The Defence Safety Function is led from the Department of State. The DG People is the 3* Safety Function Owner, with responsibility for the Defence Safety Function Operating Model and the Defence Safety Function Strategy.

The Defence Safety Function Lead acts on behalf of, and is accountable to, the Safety Function Owner.

The Dir-DSS is the Function Lead for the Defence Safety Function with responsibility for Safety Function leadership, cohering safety function risk and policy across Defence. Additionally, the Dir-DSS ensures the consideration of safety in acquisition as an adviser to the Investment Approvals Committee, supported by the Directorate of Defence Safety and Support (DDSS) Acquisition Safety Cell.

Although the Defence Safety Function sits within the Department of State, it does not lead the day-to-day management of safety within the Department of State.

The Function Owner, through the Dir-DSS (as Function Lead) maintains a formalised relationship with Senior Area Safety Function leads, providing input into their individual performance reporting. This ensures a clear, consistent relationship between the enterprise Function Owner and Defence Area function leadership.

2.3 Four Defence Areas

The Senior Leaders of the four Defence Areas (Chief of Defence Staff (CDS), Permanent Secretary (PUS), National Armaments Director (NAD) and Chief of Defence Nuclear (CDN)) provide leadership for safety within their respective Defence Area in accordance with their appointment and letters of delegation. In this capacity, they are accountable for ensuring that their Defence Area has effective governance and arrangements to manage safety risks arising from Defence activity in line with UK legislation, Defence policy and Defence regulation.

Activity safety risk is managed at the lowest appropriate level within each Defence Area, with authority to direct, prioritise and escalate resting through the relevant governance and command chains and concluding at Senior Leader level.

Senior Leaders of the Defence Areas must ensure that safety management arrangements are established and operated within their Area, aligned to JSP 815, and that appropriate governance, capability, funding and resources are applied to manage and mitigate safety risk to as low as reasonably practicable (ALARP)¹ and tolerable², meeting their legal Duty of Care.

Where Duty Holding arrangements apply, the Senior Leader of a Defence Area may by virtue of their appointment, be an Executive Duty Holder (EDH) for specific high-risk activities. EDH accountability is limited to that specific activity and operates in accordance with JSP 815. EDH status does not replace, and must not be used as shorthand for, the Senior Leader's broader Area-wide safety leadership responsibilities.

Senior Leaders should ensure they are supported by a suitably qualified and experienced competent adviser for safety matters, and each Defence Area will provide a single Area Safety Lead to liaise with the Defence Safety Function.

2.4 Accountability for safety in Defence

Accountability for safety rests ultimately with the SofS, who is accountable to Parliament. The SofS appoints the PUS to oversee the Defence Safety Management System on their behalf. The PUS is accountable to the SofS for ensuring effective safety management arrangements are in place to comply with SofS's Health and Safety Policy Statement and applicable legislation.

Senior Leaders of the four Defence Areas are accountable, under their letters of delegation, for the management of safety risks arising from Defence activity within their Areas. Where Duty Holding arrangements apply, the Senior Duty Holder is personally responsible for ensuring that an effective Safe System of Work is resourced and implemented for any activity which has a Duty Holding framework applied.

Accountability for mitigation and the application of resources sits with Senior Leaders under delegation, with escalation through ExCo and, where required, to the SofS.

¹ As low as reasonably practicable (or sometimes 'so far as reasonably practicable') is not legally defined in the Health and Safety at Work etc. Act 1974 but can broadly be defined as requiring employers to balance the cost, time, and effort of safety measures against the severity of the risk. It means reducing risks until further measures are grossly disproportionate to the benefit.

² 'tolerable' does not mean 'acceptable'. It refers instead to a willingness by society as a whole to live with a risk so as to secure certain benefits in the confidence that the risk is one that is worth taking and that it is being properly controlled.

2.5 The Defence Safety Authority

The Defence Safety Authority (DSA) Charter empowers the DSA in its role as the independent Defence regulator, assurer and investigator for Health, Safety and Environmental Protection. The Director General (DG) DSA leads in delivering against and maintaining the DSA Charter, on behalf of the SoFS through the PUS.

The DSA owns, develops and maintains Defence safety regulations (DSA 02 series) within the SMS owned by the Dir-DSS on behalf of the SoFS. The Dir-DSS and relevant stakeholders are consulted on new or changes to Defence safety regulations.

The DSA owns, develops and maintains Defence regulatory guidance documents (DSA 03 series) for regulated areas. These supplement the Defence regulations by providing Defence codes of practice, including the 'acceptable means of compliance'. The DSA manages the process of waivers, exemptions and acceptable alternative means of compliance from Defence regulations, informing the Dir-DSS where these are issued.

The DSA sits outside of the Defence Safety Function.

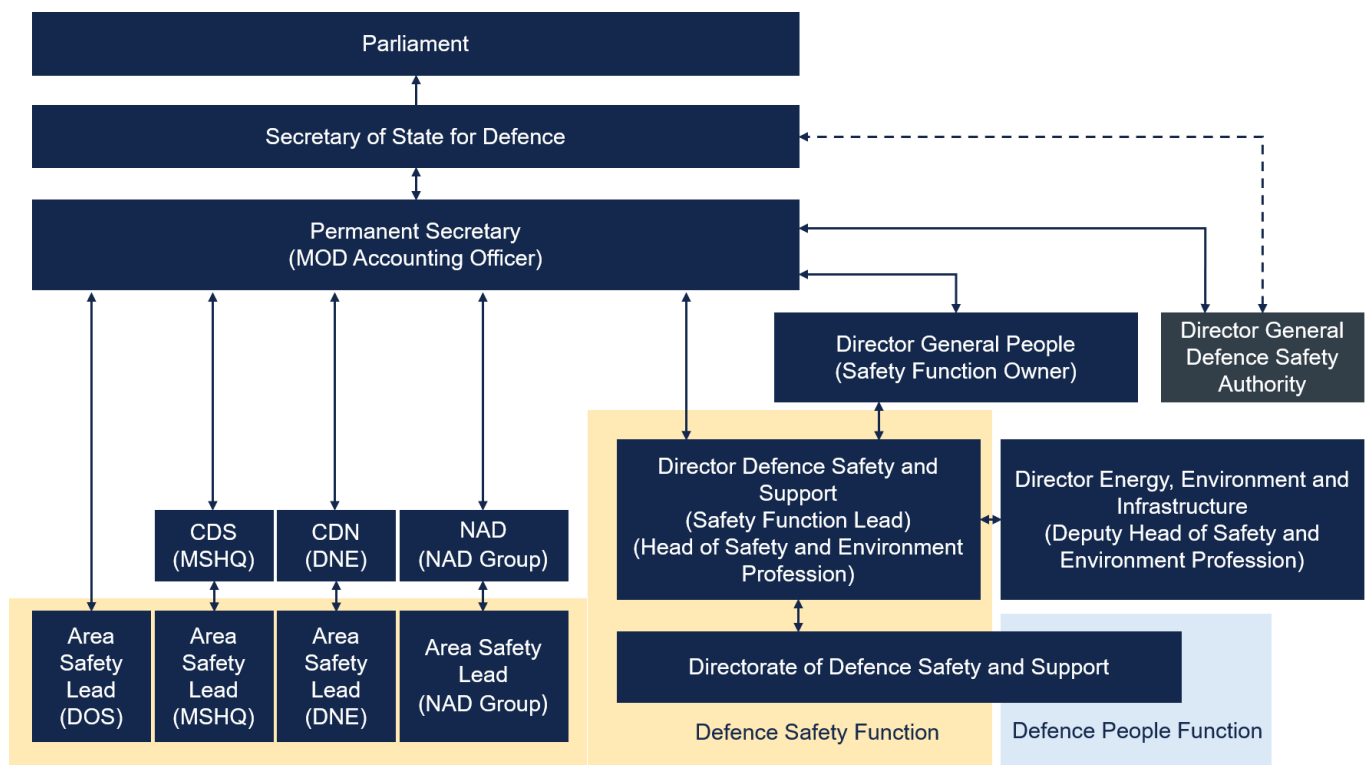


Figure 1: Overview of the structure and accountabilities for safety within the Ministry of Defence. Roles which fall within the Safety Function are highlighted in the yellow box.

3. Governance

3.1 Defence Board

The Defence Board provides strategic oversight of safety across Defence. It sets expectations and the Defence safety risk appetite, and holds senior leaders to account for the governance, resourcing and control of safety risk. The Defence Board receives the DSA Annual Assurance Report.

The Defence Board's role is strategic rather than operational. It ensures that safety risks are managed responsibly, transparently and in line with statutory duties and the agreed Defence Board risk appetite, and that safety is embedded within Defence priorities, culture and decision making. It holds the Principal Risk owner (PUS for Safety) and Defence Area Senior Leaders to account for the effectiveness of safety governance, resourcing and control.

The Defence Board is supported by the Defence Safety Committee (DSC) in discharging its safety responsibilities.

3.2 Defence Safety Committee

The DSC, as an empowered subcommittee of ExCo, is the senior forum within Defence for the oversight, challenge and assurance of safety. It oversees the direction, performance, risk and assurance of both Defence activity and the Defence Safety Function. The DSC is chaired by PUS and is administered by the Boards Secretariat.

The DSC provides oversight of safety related Principal Risk level and Strategic Risks elevated from Defence Area Management Boards, ensuring on behalf of the Defence Board that safety risks are being managed in line with statutory requirements and the agreed Defence Board risk appetite and reduced to ALARP and tolerable.

In discharging this role, the DSC scrutinises the effectiveness and progress of risk treatments, commissions deep dives where appropriate, and provides challenge to Senior Leaders of the Defence Areas on the adequacy of governance, capability, resourcing and controls in place to manage safety risk.

The DSC is not a decision-making forum for the mitigation or funding of activity safety risk. Accountability for mitigation and the application of resources sits with Senior Leaders under delegation. Where collective reprioritisation is required, escalation for decision making occurs through ExCo in line with Figure 2.

The DSC also provides a forum for the consideration of cross cutting and emerging safety issues, including those arising from regulated activities. The DG DSA provides independent advice and assessment of how regulated activity risk is being managed.

Through this role, the DSC supports the Defence Board by providing confidence that safety risks across Defence are visible, cohered and effectively assured, while maintaining clear separation between oversight and assurance and executive decision making.

The DSC membership is set out in table 1.

DSC members	Permanent Secretary (Chair) Chief of Defence Staff National Armaments Director Chief of Defence Nuclear Vice Chief of Defence Staff (MSHQ) First Sea Lord Chief of the General Staff Chief of the Air Staff Commander Cyber and Specialist Operations Command Director General People Director Defence Safety and Support A non-executive director with safety experience
Independent adviser As a non-executive independent advisor, the DG DSA will provide independent guidance to the DSC to support decision making and strengthen governance. At each DSC, the DG DSA will provide an update on Service Inquiries, Defence accident Investigation Branch triages, regulatory enforcement action and DSA-identified current safety issues in Defence activities.	Director General Defence Safety Authority
Attendees Attendees will receive all papers, and meeting invites but are only required for those meetings where they have an interest and should inform the secretariat of their intention in advance of each meeting. If they do not attend, they should pass any comments to their respective DSC member.	Director General Finance Director General Defence Medical Services Chief Risk Officer Director Analysis Infrastructure Function Leader Other officials and/or organisations may be asked to attend to support particular items.

Table 1: Defence Safety Committee composition

3.3 Defence Audit and Risk Committee

The Defence Audit and Risk Committee (DARAC) is an advisory body to the Defence Board and to the Permanent Secretary in their capacity as Accounting Officer. As part of its oversight role across all functions, DARAC reviews risk associated with the Defence Safety Function. It does not oversee or manage activity related safety risks arising from Area Management Boards and does not have a direct role in the governance of activity risk. The DARAC does not directly interact with the DSC.

3.4 Safety Function Leadership Group

The 1* and above Safety Function Leadership Group is the primary forum for engagement between the Function Lead (Dir-DSS) and the four Defence Areas. It consists of the named Senior Safety Function Lead for each Defence Area, who coheres the safety management arrangements in their Area, and acts to provide oversight, coherence and agreement on pan-Defence function issues. Issues that cannot be resolved at this level may be escalated to the DSC.

3.5 Nuclear governance

Safety function and corporate safety aspects of the Defence Nuclear Enterprise (DNE) are governed through the pan-Defence safety governance arrangements set out in this Operating Model.

Separate governance arrangements apply to safety aspects associated with nuclear specific outputs. These nuclear safety matters are managed through the Nuclear Area Board and the Defence Nuclear Board, chaired by the Secretary of State for Defence, which operates in an equivalent role to the Defence Board for nuclear outputs.

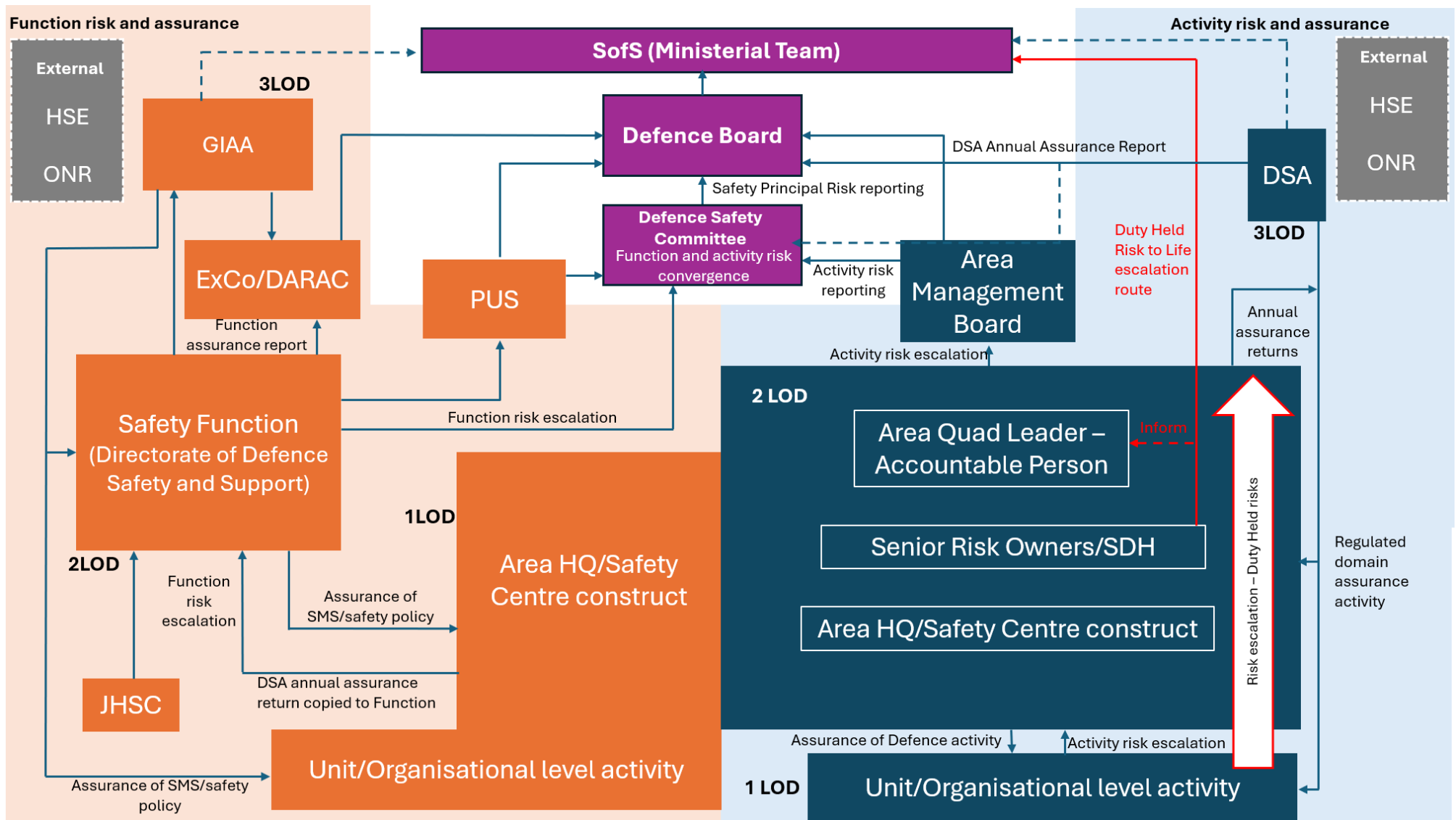


Figure 2: Safety governance, risk reporting and assurance for function (orange) and activity (blue) risks

4. Processes

4.1 Defence Safety Function-owned policy

Secretary of State Policy Statement on Health and Safety

The Health and Safety and Policy Statement is a legal requirement, which sets out the Ministry of Defence's overall approach to safety, including the SofS's personal commitment to managing safety, safety policy and senior roles and responsibilities. The Dir-DSS is responsible for maintaining the Policy Statement on behalf of the PUS.

Defence follows all relevant health and safety legislation that applies in the UK. In some cases, Defence has derogations, exemptions and disapplications from legislation that would otherwise apply but nevertheless seeks outcomes as good as statute so far as is reasonably practicable.

Overseas, Defence follows legislation that applies at the appropriate location. If laws that apply overseas fall short of UK requirements, Defence will apply UK standards, so far as is reasonably practicable.

The framework for compliance with the Secretary of State's Health and Safety Policy Statement is set out in Figure 3.

Defence Safety Management System Framework

The Defence Safety Management System (SMS) is the framework that contains the guiding principles by which all Defence Areas should manage the interrelated parts of their business in order to conduct and manage activities safely. The Defence SMS is set out in JSP 815 and is based on good practice and information taken from the Health and Safety Executive (HSE) publication HSG 65 and is aligned to ISO 45001 (occupational health and safety management systems).

The Defence SMS sets the strategic direction for safety and puts in place a set of consistent expectations across Defence to meet when delivering Defence outputs and activities. It also describes how Defence demonstrates good practice and continual improvement towards meeting the requirements of the SofS's Health and Safety Policy Statement.

Defence safety policy

The Dir-DSS is responsible for developing and maintaining effective safety policies and guidance on behalf of the PUS. Defence policy which must be met, and the guidance that should be followed in order to meet the policy, is predominantly published in Joint Service Publications (JSPs). Following Defence safety policy supports Defence Areas to comply with legislation and statutory regulations.

The Defence SMS, safety policy and guidance owned by the Dir-DSS includes the following JSPs:

- **JSP 815 – Defence Safety Management System**

This provides the framework, direction and guidance to enable Defence Areas to develop and implement their own safety management arrangements tailored to their business.

- **JSP 375 – Management of Health and Safety in Defence**

This covers the basic arrangements for complying with health and safety law. Each chapter covers a separate hazard or work environment in which safety measures are needed to protect employees.

- **JSP 376 – Defence Acquisition Safety Policy**

This provides Defence-level, pan-domain policy on the application of safety considerations within acquisition activity. It draws together the requirements of the wider Defence safety policy contained in the Defence SMS and Defence acquisition policy, in particular JSP 655 - Defence Investment Approvals.

- **JSP 426 – Defence Fire Safety and Fire Risk Management**

This provides policy and guidance on fire safety and fire-risk management. This JSP is owned and managed by the Chief Fire Officer, under the sponsorship of the Director Defence Safety and Support.

Defence Areas and the DSA support the DDSS to develop Defence safety policy.

Safety policy may include policy to prevent medical conditions but does not cover the policy for medical healthcare, which lies with Defence Medical Services and is set out in JSP 950 - Medical Policy.

Other JSPs may include reference to safety as a secondary aspect to the main subject of the policy. Where this is the case, JSP owners are responsible for ensuring safety aspects remain up to date and are developed in consultation with the Dir-DSS, the four Defence Areas and trade unions. The Dir-DSS monitors the efficacy of the safety aspects of these policies.

The Dir-DSS leads on presenting new or updated policy where appropriate to the DSC, which acts as a decision-making body for significant or contentious safety policy and regulation issues.

The Dir-DSS makes sure that all new or updated safety policy is widely consulted on amongst stakeholders, including the Defence Areas, the DSA and trade unions. The Defence Areas and the DSA are responsible for identifying a suitably empowered individual to coordinate the policy consultation with relevant subject matter experts, prior to confirming agreement.

The Dir-DSS considers the impact on equality and diversity, as set out in the Public Sector Equality Duty guidance, and makes sure that accessibility is considered for publishing on Defnet and GOV.UK. DDS also supports ministers when making safety policy decisions to pay due regard to the five environmental principles in the Environment Act 2021.

The Dir-DSS is the Defence lead for the consideration of and response to new safety legislation. It leads a programme of continuous review of safety JSPs to ensure they reflect good safety practice, respond to investigation and inquiry recommendations and to address any new or amended UK legislation relating to health and safety.

Defence Instructions and Notices (DINs)

The Dir-DSS is responsible for the moderation of all safety related DINs. All new DINs relating to safety must be approved by the DDSS.

4.2 Defence Regulation

Defence regulations are put in place to manage risk, protect personnel, reduce harm to the environment and preserve operational capability.

The regulation is the rule or the authoritative direction. They are mandatory requirements which have to be followed without exception (unless a concession/waiver/exemption has been formally issued). They are complementary to the legislative and policy framework and must be considered as part of a continuum of documentation that underpins all activity undertaken within Defence. Defence regulations form part of the Defence SMS and are owned by the DSA. As such, they are not considered a Function artefact.

Defence safety regulations are not intended to replace relevant legislation, should not seek to duplicate and must be coherent with Defence policy, and are developed and maintained for one or more of the following reasons:

- A derogation (a relaxation of a statutory requirement, to allow the law to be applied differently for justifiable practical or operational reasons); an exemption (a formal written authorisation normally requiring to be issued by the SofS for Defence for all or a part of specific legislation or Defence regulation to not apply) or a disapplication (where all or part of specific legislation does not apply to Defence) – collectively known as ‘DEDs’ – applies.
- The DSA regulator has a delegation from the statutory regulator or is directed by authorised local authorities.
- The Dir-DSS or a Defence Area has requested, and the DSA has accepted, that an area of MOD activity is not sufficiently regulated.
- There is a gap in UK legislation that needs to be filled when considering MOD activity or following lessons identified.
- For activities that are considered as high risk, where the DSC, in consultation with the Dir-DSS and the Defence Areas, has decided that the legislation does not provide enough regulation for specific military activities.

Where the DDSS or Defence Areas do not accept or agree DSA regulatory intent, the matter is to be referred to the PUS who may choose to discuss at the DSC and then with Ministers for resolution.

The DSA will consult with the DDSS and the Defence Areas, through the DSC, as well as with trade unions, on changes to or new safety regulations. The Defence Areas and the DDSS are responsible for identifying a suitably empowered individual to coordinate the regulation consultation with relevant subject matter experts, prior to confirming agreement.

Legislative Derogations, Exemptions and Disapplications

The Dir-DSS leads on the approvals process for proposed derogations, exemptions and disapplications (DEDs) (i.e. the provision of the DED in draft legislation rather than the exercise of that DED once in law) to UK safety legislation with the support of the DSA, coordinating with other Defence Areas, and securing the agreement of the DSC where appropriate.

With the exception of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulations, the DSA leads on the management of agreed safety-related DEDs (i.e. the exercise of those DEDs already in law and enacted by MOD) including:

- Recording which legislation provides for DEDs
- Producing Defence regulation where appropriate and to manage an exemption, disapplication or derogation in consultation with the Directorate of Defence Safety and key stakeholders.

The Dir-DSS collates approved exemptions certificates.

Defence Areas lead on individual applications for the use of an exemption from safety-related legislation in consultation with DDSS and key stakeholders.

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulations

The National Armaments Director Group manages the process for exemptions from REACH legislation.

4.3 Defence Area safety arrangements

Defence Areas ensure that safety management arrangements are in place, and they are aligned to the Defence SMS (JSP 815). The Defence Area safety management arrangements set out how the Defence SMS and underpinning policy, and Defence regulations will be delivered.

Defence Area safety policy

The default position should be that in keeping with MOD's policy simplification agenda, Defence Areas do not seek to duplicate Defence policy or regulation. Where Defence Areas feel that additional guidance is required, this should be discussed with the DDSS with a sound justification provided.

Defence Areas are responsible for making sure that any organisation-specific safety guidance is written in line with the Defence SMS and does not conflict with any Defence policy or regulations. Defence Areas are responsible for ensuring suitable consultation with the DDSS, other Areas, the DSA and trade unions.

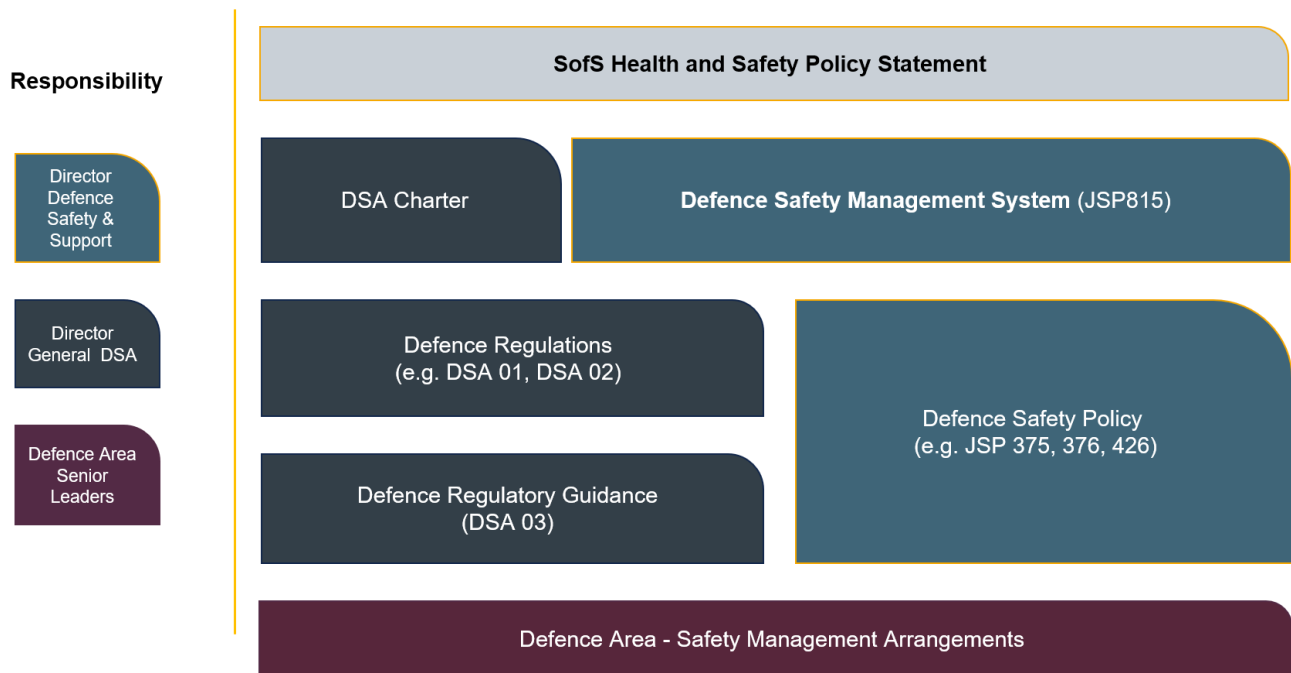


Figure 3: Defence safety policy and regulation framework

4.4 Core processes

Core processes describe the higher level, major end-to-end repeatable, documented series of activities designed to implement a policy. They are owned by the Safety Function and are operated by the Areas.

Each core process may therefore draw on multiple chapters / topics across JSPs.

The core processes for the Safety Function are set out in the table below:

Core Process	What It Covers	Policy ³
1. Emergency preparedness & response	Major incident planning, public events, environmental/extreme conditions	JSP 375
2. Risk assessment & Safe Systems of Work	How risks are identified, assessed, controlled, and documented	JSP 375
3. Workplace safety management	Day-to-day workplace conditions, inspections, signage, traffic	JSP 375
4. Health & wellbeing management	Health surveillance, manual handling, PPE, stress, vulnerable groups	JSP 375/661
5. Safety occurrence reporting & investigation	How accidents, near misses and occurrences are reported and learned from	JSP 375
6. Contractor & third-party safety	Managing safety expectations and oversight of contractors/visiting workers	JSP 375

³ Other Defence policy may cover these processes; however, it is not owned by the Safety Function.

7. Safety governance & assurance	Competence, records, change management, safety oversight	JSP 375/815
8. Acquisition safety management	How safety is managed through capability development and delivery	JSP 376
9. Acquisition safety requirements	Setting and managing safety requirements for new capability	JSP 376
10. Acquisition testing & evaluation and certification	Ensuring safety through testing and certification activities	JSP 376
11. Acquisition safety case	Producing and maintaining the safety case throughout the lifecycle	JSP 376
12. Acquisition safety assurance & approvals	Independent assurance and evidence for investment/approvals	JSP 376

Table 2: Safety Function core processes aligned to relevant policy

4.5 Key controls

As the owner of Defence safety policy and the overarching Defence SMS, the Dir-DSS acts as the control owner. The control owner sets the organisational expectations and what good looks like.

The Defence Areas, as the control operator, are responsible for implementing the appropriate processes to manage the day-to-day risks associated with Defence activity and to ensure compliance with the controls.

This section sets out the overarching key controls for the Safety Function (table 3), as required by Defence Risk and Assurance (DRA). This is not an exhaustive list of function controls, rather the high-level controls that, if adhered to, provide Defence's senior leadership the assurance that safety is being effectively managed within Defence. Controls applicable to the day-to-day delivery of Defence activities are set out in the relevant policies.

Safety management arrangements – governance and compliance

This includes the demonstration that local safety management arrangements, compliant with JSP 815, are established, implemented and maintained in accordance with JSP requirements, with clearly defined roles, responsibilities and governance arrangements that are actively operated, periodically reviewed, and subject to internal assurance.

Policy reference:

- JSP 815
- JSP 375

Learning from experience (LFE)

The demonstration that all safety occurrences and regulatory notices are reported, investigated and analysed in accordance with Defence requirements, with lessons identified, corrective actions tracked to completion, and trends proactively monitored and escalated to prevent recurrence and address systemic risk.

Policy reference:

- JSP 375
- JSP 815

Competence, training & authorisation

Ensuring personnel undertaking safety critical activities are demonstrably competent, appropriately trained and formally authorised for their roles, with competence requirements defined, records maintained and routinely assured, and any identified gaps risk assessed and addressed in a timely manner.

Policy reference:

- JSP 375
- JSP 815

Risk assessment & Safe Systems of Work

Ensuring suitable and sufficient risk assessments and Safe Systems of Work are in place for all activities, are communicated and implemented effectively, and are regularly reviewed and monitored to ensure control measures remain effective.

Policy reference:

- JSP 375
- JSP 815

Local assurance / self-assessment (first line of defence)

The first line of defence actively monitors compliance with the Defence SMS and statutory requirements through planned self-assessments, inspections and audits, with findings recorded, risk rated, escalated where required, and corrective actions tracked to closure.

Policy reference:

- JSP 815
- JSP 375

Acquisition safety (equipment, programmes and projects)

Ensures acquisition activities comply with mandated Defence safety processes across the lifecycle, ensuring safety artefacts are maintained and assured, suppliers meet contractual safety requirements, and safety risks are formally accepted by the appropriate authority.

Policy reference:

- JSP 376
- JSP 815

Infrastructure and estate safety (construction, FM, built environment)

Ensures infrastructure, estates, FM and construction activities are managed safely, with statutory and Defence requirements met, contractors effectively controlled, and estate specific risks identified, assessed and controlled.

Policy reference:

- JSP 375
- JSP 815
- JSP 850

Table 3: Safety Function key controls

4.6 Stakeholder engagement

External engagement

The Dir-DSS owns the strategic relationship with:

- the Health and Safety Executive on behalf of the MOD
- Safety leads within key industry partners through the Defence Industry Safety Forum

Trade unions

The Dir-DSS leads in consulting with the recognised trade union on MOD-wide safety issues via the Departmental Joint Health and Safety Committee (JHSC).

The Departmental JHSC is established (under the terms of Regulation 9 of the Safety Representatives and Safety Committees Regulations 1977) to be the forum for health and safety matters relating to the civilian workforce to be discussed at a corporate level between the recognised trade unions, the Defence health and safety management, the Defence Police Federation and safety representatives from staff organisations recognised by Defence.

The JHSC is consulted during the development of updated or new safety policy owned by the DDSS.

The Defence Areas are responsible for ensuring there are suitable arrangements for equivalent trade union engagement and consultation on safety matters and policy within their Areas, beyond generic trade union engagement through Whitley Committees.

5. Risk and assurance

5.1 Overview

Safety is an ExCo overseen Principal Risk, with the PUS as the owner.

Defence applies a Three Lines of Defence model to provide layered assurance over:

- Activity risk and assurance (managed in Defence Areas and delegated down into Military Commands; assured via Defence Area constructs and the DSA), and
- Safety function risk and assurance (owned through the Safety Function, aligned to the Orange Book).

Figure 2 sets out how safety function risk (orange) and activity risk (blue) are reported and assured, including the exceptional escalation route for time critical Duty Held risk.

Activity assurance provides confidence that safe systems of work exist and are followed and that safety legislation, Defence policy and regulation are being complied with. Oversight is provided through DSC and Defence Board, consistent with Figure 2.

Function assurance provides confidence that Areas operate effective safety management arrangements and comply with Defence safety policy, controls and processes owned by the Function.

5.2 Activity risk

Activity risk is managed at the lowest appropriate level through Defence Area arrangements with delegations to Military Commands and units.

When necessary, risks are escalated through the Defence Area HQ / Safety Centre construct to the Area Management Board (4* Area Leads) for coherence, prioritisation and direction.

Where cross cutting mitigation or collective reprioritisation is required, escalation for decision is made to ExCo in line with Figure 2. The DSC provides oversight, challenge and assurance, but is not a decision point for activity risk mitigation.

Across Defence, responsibility for directing activity safety risk, determining priorities, and deciding when escalation is required sits within the relevant Defence Area. For the Armed Forces (MSHQ and Military Commands), the NAD Group and the DNE, this authority is exercised through their respective governance and command chains and concludes at the 4* Area or Military Command leader level.

Senior Leaders within the Defence Areas are responsible for ensuring that risks arising from any activity are managed by the respective Area in line with statutory requirements, focusing on suitable and sufficient risk assessment and controls and the discharge of the legal Duty of Care.

Strategic safety risks are managed and cohered at the Area Management Board and reported to the DSC and ExCo for oversight and assurance (noting funding driven mitigation follows the route set out in Section 5.3).

Activity risk is normally managed through the Area Management Board, with management normally delegated to the Military Commands within the Armed Forces. Where required, risk may be escalated for mitigation and reprioritisation.

Where an activity risk cannot be mitigated to ALARP and tolerable or constitutes a societal risk or a material risk to life, there is a requirement to escalate to the SofS. This would normally be done by the Defence Area Senior Leader (as EDH if Duty Holding is applied). Where the situation is time critical, such that normal governance routes cannot be followed, the risk may be escalated directly to the SofS by a direct subordinate to the Area senior leader (as SDH if Duty Holding is applied).

In such circumstances, the activity should stop unless there is an overwhelming and previously ministerially endorsed operational imperative. The relevant Defence Area Senior Leader (if not escalated by them) and the Dir-DSS must be informed of any such escalation.

Where Duty Holding arrangements apply, the four formal Duty Holder appointments are:

- Executive Duty Holder (EDH) - a senior leader by virtue of their appointment acting as the executive accountable Duty Holder for specific Duty Held activity. (Note: this is activity-specific and must not be used as a universal label for Senior Leaders.)
- Senior Duty Holder (SDH) - Military Command Chiefs, Portfolio Leads or equivalent, appointed and accepted in writing for a defined Duty Held activity.
- Operating Duty Holder (ODH)- senior management oversight for the activity, appointed and accepted in writing.
- Delivery Duty Holder (DDH) – day-to-day supervision of the activity, appointed and accepted in writing.

When appointed, a Defence Duty Holder is responsible for the safe conduct of activities within their area of responsibility by ensuring that risk is ALARP and tolerable.

Risk owners within the Defence Areas, with the support of the DSC, are responsible for implementing the Defence Board's safety risk appetite within their respective Areas.

5.3 Mandatory risk escalation and funding alignment for safety risk mitigation

Funding is delegated to Defence Areas through Area Plans, aligned to the Defence Plan, and is categorised as Run / Readiness, Operate or Invest funding. Budgets may be sub delegated in line with established financial delegations and the responsibilities set out in Senior Leaders' letters of delegation.

Safety risks are expected to be mitigated at the lowest appropriate level using existing delegated budgets. Where Senior Leaders, or Executive Duty Holders where Duty Holding arrangements apply, do not have the necessary levers, or where a safety risk cannot be mitigated to ALARP and tolerable within existing Run / Readiness or Invest allocations, escalation is mandatory and must not be delayed by attempts to resolve funding locally.

Where failures in delivery, sustainment, maintenance or contractor performance give rise to a material safety risk to personnel, this is treated as a safety risk for the purposes of escalation and funding under this section.

Delegated safety responsibilities, risks and budgetary responsibilities are to be managed within the delegated authority and resources wherever practicable, including reprioritising activity and investment to achieve and maintain risks that are ALARP and tolerable. The Integrated Force Strategic Cycle (IFSC) provides the key mechanism through which this operates as a coherent framework, enabling structured engagement at all levels between staff across the Armed Forces, (MSHQ and Military Commands) and the NAD Group to analyse priorities, consider trade-offs and agree resource informed options within Defence's established governance. Where risks cannot be reduced to ALARP and tolerable within delegated authority through these means, escalation may be required through the appropriate safety and resource governance routes.

In line with their letters of delegation, CDS, NAD and CDN are accountable for the management and mitigation of the safety risk within their respective Areas, including where this requires the allocation, reprioritisation or escalation of funding.

Those managing safety risk are expected in the first instance to balance priorities and resources within their delegated authority to achieve ALARP and tolerable, including through direct engagement with the NAD Group using the Integrated Force Strategic Cycle (IFSC), which provides the framework to resolve such issues at the lowest practical level.

Where safety risks cannot be reduced to ALARP and tolerable within delegated authority through these means, escalation serves two distinct purposes: to enable appropriate safety leadership, assurance and accountability through Defence safety governance; and to enable consideration of reprioritisation or, where necessary, additional investment through Defence's established financial governance. Residual risks are escalated through Area governance for assurance, with the appropriate Area Lead or Executive Duty Holder accountable for Area level risk acceptance.

Once agreed, funding is directed through the relevant Area financial mechanisms to enable the timely implementation of the required risk mitigation actions.

CDS and NAD retain accountability for the safety risk until it has been effectively mitigated, and assurance has been provided through Defence governance. Material safety risks and associated funding escalations are reported through the DSC and ExCo, providing senior level oversight, challenge and assurance. Ultimate accountability for safety rests with the SofS for Defence.

5.4 Activity assurance

Defence Areas are responsible for providing assurance that activity risks are being managed effectively and in accordance with statutory requirements, Defence safety policy and regulation.

Activity assurance is delivered through a Three Lines of Defence (3LoD) model.

First Line of Defence (1LoD) activity assurance is conducted by the unit or organisation responsible for delivering the activity. This includes ensuring that suitable and sufficient risk assessments and controls are in place and are being applied in practice.

Second Line of Defence (2LoD) activity assurance is conducted through the Area HQ and Safety Centre construct, or in the Armed Forces is delegated to the Military Commands.

This provides oversight and challenge of activity level risk management, including monitoring compliance with Defence safety policy and the effectiveness of local controls.

Third Line of Defence (3LoD) assurance of Defence activity is provided independently by the Defence Safety Authority (DSA), in its role as regulator, assurer and investigator.

5.5 Safety Function risk

The Defence Areas are responsible for managing safety function risk within their organisations. This is undertaken through the Chain of Command, applying the arrangements set out in Area policies and plans, aligned to the Defence Safety Management System.

Defence Areas are responsible for identifying, assessing and controlling safety function risks arising from their operations and activities, ensuring that safety function risks are managed consistently and in line with Defence expectations.

The Dir-DSS provides safety function risk management oversight across Defence by:

- collating enterprise-level safety function strategic risks to establish a coherent Defence safety function risk picture; and
- cohering strategic safety risks associated with the Safety Function's artefacts, systems and corporate frameworks, aligning them under the relevant Principal Risk. This activity is undertaken on behalf of the Principal Risk owner (PUS for Safety) to enable informed discussion and decision-making at the Defence Board.

These arrangements ensure that safety function risk is consistently interpreted, systematically managed and transparently governed across Defence.

The reporting of safety function risk is commissioned under the authority of the PUS, as Principal Risk owner for safety, in support of ExCo oversight. This authority is delegated to Risk Owners appointed by the Defence Board.

DRA sets the reporting requirements, cadence and assurance standards on ExCo's behalf and issues the formal commission.

The Dir-DSS provides safety function risk updates to DRA, aligned to ExCo's Principal Risk review cycle and the Defence Board. Regular second line assurance updates are also provided to DARAC and the DSC, focused on control effectiveness and confidence. These updates are informed by inputs from the Defence Areas, with the DDSS coordinating, quality assuring and synthesising contributions, including any interactions between function and activity risk.

5.6 Function assurance

The MOD operates the Three Lines of Defence (3LoD) model for Safety Function risk management and assurance, in line with HM Treasury's *Orange Book*.

First Line of Defence (1LoD) assurance is delivered by the four Defence Areas through their respective chains of command. Each Area provides assurance in accordance with its policies and plans, aligned to the Defence SMS. This assurance may be undertaken at multiple levels, from unit level through to Area Safety Centres or equivalent structures.

Second Line of Defence (2LoD) assurance is provided by the Dir-DSS, as Safety Function Lead. In this role, the DDSS sets Defence wide safety policy, controls and processes, and tests how effectively they operate across Defence. Defence Areas are required to comply with these standards and to share management information and data transparently and regularly with the Function.

2LoD assurance activity may include:

- a risk-informed programme of assurance deep dives, reviewing both safety management arrangements and the implementation of Defence safety policy;
- monitoring Defence-wide safety performance, including analysis of data from platforms such as MySafety and interpretation by Defence Statistics; and
- commissioning and collating 1LoD assessments from the four Defence Areas. These are integrated with the Function's own findings to produce the Safety Function Assurance Report, providing a consolidated view of Defence's safety position.

The DDSS does not undertake assurance of Defence activity, which is conducted by the relevant Defence Area and the DSA. Safety Function assurance may, however, include high level consideration of Defence activities where this is necessary to assess the overall effectiveness of the Defence Safety Management System or compliance with Safety Function owned policy.

Third Line of Defence (3LoD) assurance provides an independent assessment of Defence's compliance with UK safety legislation and Defence policy. 3LoD assurance is conducted by the Government Internal Audit Agency (GIAA) through independent internal audit and evaluation of governance and risk management arrangements.

5.7 Risk convergence and coherence

The DSC is the primary senior level forum for converging and cohering safety risk across Defence, bringing together both safety function risk and activity safety risk.

In this role, the DSC may challenge Defence Areas to demonstrate that pan-Defence activity risks are being managed to ALARP and tolerable, and in line with the Defence Board's safety risk appetite. The DSC also provides a forum to surface cross cutting and enterprise level safety issues, including those where further risk reduction may require collective consideration or additional funding.

The DSC does not allocate funding or make decisions on the mitigation of activity safety risk. Accountability for mitigation and the application of resources sits with Senior Leaders under delegation, with decision making for reprioritisation occurring through ExCo, consistent with Figure 2.

5.8 External assurance

External regulators, including the Health and Safety Executive (HSE) and the Office for Nuclear Regulation (ONR), provide independent assurance over both Defence activity risk and safety function risk.

These regulators provide external oversight of Defence's compliance with applicable safety legislation and regulatory requirements and may undertake inspections, investigations or other regulatory activity as required.

6. People

6.1 Safety and Environment Profession

The Safety and Environment Profession is a Defence specific profession established to attract, retain and develop the skills and capability required to support safe delivery of Defence activity. It underpins organisational effectiveness and supports the professional development and career pathways of its members.

Individuals may identify with more than one profession; however, each role will normally have a single core professional anchor.

The environmental element of the Safety and Environment Profession is limited to environmental protection. It does not include climate change and sustainability professionals.

The Dir-DSS is the Head of Profession for the Safety and Environment Profession and is responsible for building and sustaining Defence's professional capability. This includes identifying skill gaps, setting professional standards and supporting the development of individuals to ensure Defence maintains a capable and appropriately skilled workforce.

The Director Energy, Environment and Infrastructure (Dir-EEI) is the Deputy Head of Profession, with responsibility for the environmental protection elements of the profession.

The Safety and Environment Profession works in partnership with the People Function and the MyHR development team to improve the quality, consistency and accessibility of professional information relating to the profession.

6.2 Cultivating and managing talent

The DDSS, supported by the Directorate of Energy, Environment and Infrastructure, provides professional expertise and guidance to develop and maintain the safety and environment standards, competency frameworks and skills models across Defence. This includes:

- Developing and promoting career pathways available to staff within the Safety and Environment Profession and the wider workforce, including entry-level routes into the profession.
- Promoting the use of the relevant competency frameworks to recruit and develop people with the necessary skills, experience, qualifications, competencies and professional accreditations to maintain expertise relating to safety and environmental protection.

Professional accreditation is encouraged within the Safety and Environment Profession, and formal qualifications may be required for specific roles. All safety and environmental protection professionals are encouraged, as part of their ongoing development, to join one of the recognised professional bodies.

The Dir-DSS leads engagement with health and safety professional bodies, including through corporate membership arrangements. The Director Energy, Environment and Infrastructure leads engagement with environmental professional bodies, including through corporate membership.

6.3 Training

The DDSS leads on the profession's approach to safety training. This includes acting as Training Requirements Authority (TRA) for all function safety training aligned to Defence policy.

In its role as TRA, the DDSS sets the requirements for function safety training and oversees delivery to ensure alignment with Defence policy and standards. The delivery of safety training courses is undertaken by the Defence School of Safety, acting as the Training Delivery Authority, which sits within the MSHQ.

Individual Defence Areas or other functions may lead on specialist or domain specific safety training where required to meet particular operational or technical needs.

6.4 Recruitment

While the seniority and grading of roles vary by function, a common principle across Defence is that functions influence the recruitment of senior professional posts. This supports both Defence Area leadership requirements and Defence-wide talent pipeline planning.

The Dir-DSS, as Safety Function Lead, or their nominee, is consulted on and agrees the recruitment approach for key safety leadership roles. The Dir-DSS, or their nominee, sits on selection panels for Senior Area Safety Function Leads, Heads of Safety, and Chief Environment and Safety Officer appointments.

This approach ensures that Defence Areas benefit from Safety Function expertise during recruitment and that senior safety roles are defined consistently with the Safety Function's strategy, capability model and professional standards, enabling coherent workforce and skills planning across Defence.

6.5 Strategic workforce planning

The Dir-DSS, supported by the Director Energy, Environment and Infrastructure and the Defence Areas, is responsible for developing and maturing the Safety Function and the Safety and Environment Profession in line with the Defence Strategic Workforce Plan.

This includes quantifying workforce demand on behalf of the Defence Safety Function, defining safety critical roles, and articulating current and future function capability requirements to inform wider Defence strategic workforce planning

7. Data and technology

Effective information and knowledge management is central to enabling data driven decision making and to the effective operation of the Defence Safety Function.

The Dir-DSS, supported by input from the Defence Areas, is responsible for cohering the digital demand of the Safety Function. This includes:

- Setting and managing the overall digital direction for the Function.
- Identifying the digital solutions required to support safety management, including risk assessment, safety reporting, health surveillance, assurance and lessons learned.
- Understanding the current digital landscape, including locally developed digital tools within Defence Areas.
- Cohering the implementation of digital platforms through a collaborative approach, to ensure consistency and interoperability across the Defence enterprise.

Defence Areas may identify digital opportunities, develop local solutions or propose new capability. This activity must be undertaken in conjunction with the Dir-DSS to ensure alignment with the overall Safety Function digital direction and to avoid duplication of effort.

8. Culture

Culture can be described simply as '*the way we do things in Defence*'. A strong safety culture is founded on shared values and consistent behaviours that apply to everyone working in Defence, whether military, civilian or contractor. At its core, this culture requires individuals to take personal ownership of safety by recognising hazards, raising concerns and acting proactively to prevent harm. Speaking up is essential, and people must feel confident to challenge unsafe decisions, assumptions or behaviours, regardless of rank or role. Such challenge should be welcomed as a normal and integral part of safe and effective operations.

Transparency and learning are equally important. Defence expects all safety occurrences to be reported openly and promptly, not to apportion blame, but to ensure that lessons are identified and improvements are made.

Leadership at all levels plays a critical role in shaping this environment. Senior leaders across the Defence Areas set the tone that influences safety behaviours throughout Defence. Leaders are expected to demonstrate visible commitment to safety, foster psychological safety, and ensure that safety considerations remain central to decision making.

To operate as a unified, integrated *One Defence* enterprise, these cultural expectations must be reinforced through practical ways of working. Defence Areas are responsible for seeking alignment through standardised approaches, shared terminology and common processes, applying the principle of *as similar as possible, as different as necessary*.