

**Not to be communicated to anyone
outside HM Service without authority.
UK MOD © Crown copyright 2018.**

**ACSO
3216
(FIRST EDITION)**



ARMY

ARMY COMMAND STANDING ORDER

NO 3216

**THE ORGANIZATION AND ARRANGEMENTS FOR THE MANAGEMENT
OF SAFETY AND ENVIRONMENTAL PROTECTION IN THE ARMY**

ISSUED MAY 2018

Sponsored By:

Authorised By:

**Chief Environment and Safety Officer
(Army)**

Deputy Chief of the General Staff

Intentionally blank

CONTENTS

Chief of the General Staff's Personal Commitment to Safety.

Chapter 1 The Organization and Arrangements for the Management of Safety and Environmental Protection (S&EP) in the Army – Overview.

Chapter 2 Army Culture for Safety.

Chapter 3 The Safe System of Work / Training.

Chapter 4 Army Duty Holding.

Chapter 5 Risk Referral and Dispensation Process.

Chapter 6 Capability Management – Roles and Responsibilities.

Chapter 7 Army Safety Governance.

Chapter 8 Accident and Incident Reporting.

Chapter 9 Plan, Do, Check, Act Methodology.

Chief of the General Staff's Personal Commitment to Safety

As the Chief of the General Staff, and the Army's Senior Duty Holder, I would like to stress my personal commitment to working, training, and operating safely. Commanders at every level have a duty to look after their soldiers properly, not least because avoidable accidents inevitably reduce operational effectiveness.

It is essential that we train hard and realistically - if we don't we simply transfer risk from training to operations. You will know that we have a legal duty to provide the right training for our soldiers and this sometimes involves placing them in hazardous situations. We have to ensure that when we do this, we do it with appropriate controls. This is about risk mitigation, which is best done by commanders at all levels applying the Safe System of Training. By doing so, we will achieve the correct balance between challenging training and acceptable risk that creates the opportunity for soldiers to make honest mistakes, in the pursuit of learning enduring lessons, in a safe environment.

Much of what we do is dangerous by necessity. I expect all of you to ensure that your conduct in barracks, when training, when deployed or on the sports field is as safe as it can be. There is absolutely no space for a reckless or cavalier approach to safety.

CGS

ARMY COMMAND STANDING ORDER NO 3216 (FIRST EDITION)

THE ORGANIZATION AND ARRANGEMENTS FOR THE MANAGEMENT OF SAFETY AND ENVIRONMENTAL PROTECTION IN THE ARMY

CHAPTER 1

References:

- A. Secretary of State for Defence Health, Safety and Environment Policy Statement.
- B. DSA 01.1 – Defence Health, Safety and Environmental Protection.
- C. JSP 375 – Management of Health and Safety in Defence.
- D. JSP 418 – Management of Environmental Protection in Defence.

Context

1. The Army is required by UK law and Defence policy (References A – D) to minimise work-related fatalities, injuries, ill-health and adverse effects on the environment from its activity. By doing so, the physical and moral components of Fighting Power are enhanced. Consequently, S&EP has leadership¹ at its core and all Army personnel, irrespective of rank, have legal responsibilities under the Health and Safety at Work etc. Act 1974 (HASWA) to provide a duty of care to subordinates, each other and those who may be affected by their acts or omissions. The Army delivers its Safety commitments in conjunction with Environmental Protection².

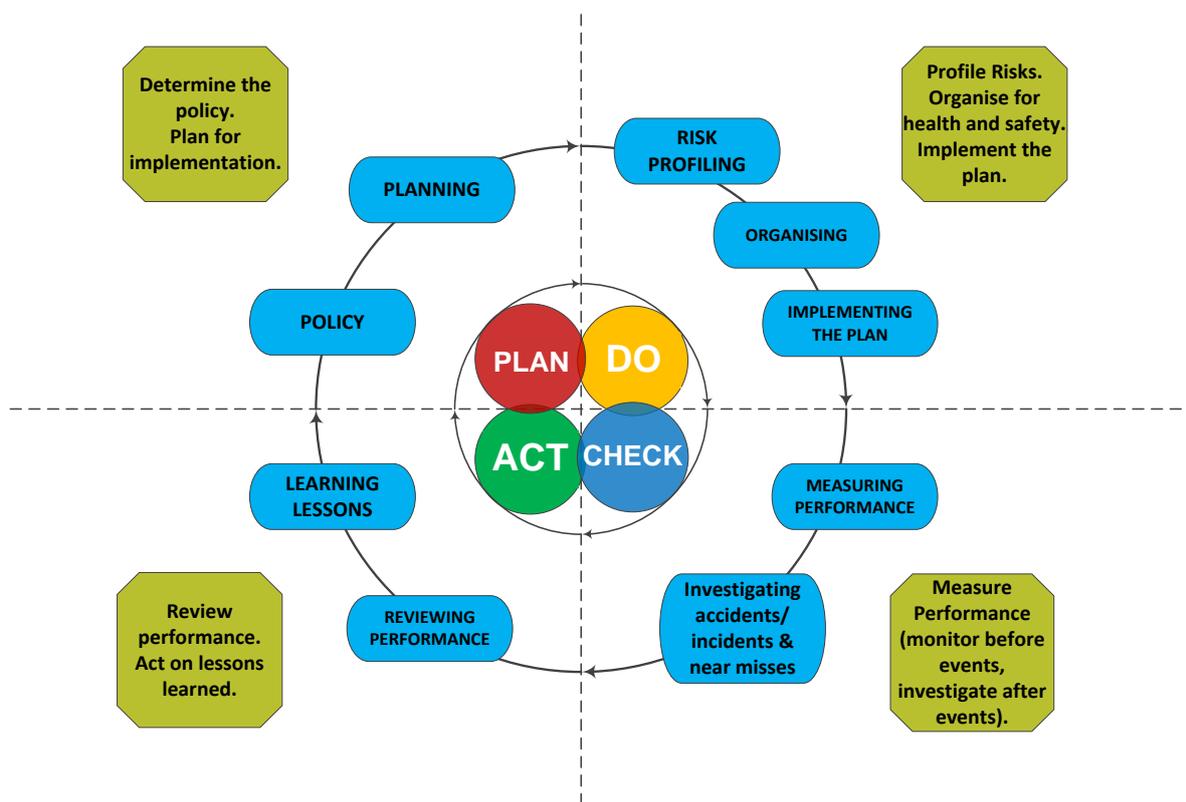
2. The Secretary of State for Defence has ultimate responsibility for Health, Safety and Environmental Protection in Defence and has issued a [Policy Statement](#). He has appointed the Permanent Secretary as the Department's most senior official for Health, Safety and Environmental Protection and he is required to ensure that effective management arrangements are in place to achieve compliance with SofS's Policy Statement. The Permanent Secretary is supported in this duty by the Defence Safety Authority (DSA) who regulate, assure and investigate S&EP where there is a Departmental responsibility. Additionally, Health and Safety at Work is regulated by the Health and Safety Executive (HSE) and environmental matters are regulated by the Environment Agency (EA) (or equivalents in Scotland, Wales and Northern Ireland).

3. The HSE recommends an approach to safety based on a Plan, Do, Check, Act cycle (as set out in the HSE's HSG 65 document) which achieves a balance between systems and behavioural aspects and encourages the integration of safety management with Organizational management generally. The term Safety and Environmental Management System (SEMS) is used by Defence³ to describe the systematic approach that will be implemented for HS&EP management and the collection of specific arrangements that underpin this implementation. The model is shown graphically below and is the framework for the Army's SEMS. The Plan, Do, Check, Act cycle is described in more detail at Chapter 9.

¹ Refer to the Army Leadership Code.

² It should be noted that the Defence Fire Risk Management Organization (DFRMO) has the lead for Fire policy and the Army's Senior Health Advisor (SHA(A)) has the lead for Occupational Health.

³ DSA 01.2



The HSE Model – Plan, Do, Check, Act.

Aim

4. This ACSO sets out the SEMS, for S&EP in the Army TLB.

PLAN

5. CGS, as the Army's Senior Duty Holder (SDH), is responsible and accountable to SofS for conducting Defence activities in his area of responsibility (AoR) safely, environmentally responsibly and compliant with legislation. [CGS' policy statement](#). The Army must implement S&EP management systems that are proportionate to the risks and hazards faced – the greater or more complex the risk, the more sophisticated the system required to manage it. It is essential that the Army has a full understanding of the risks it faces in order that the management of them is sensible, proportionate and conducive to the Army's ethos, culture and requirement to deliver capability. Striking the right balance requires sound judgement and a strong, informed and 'Just' safety culture (further guidance on having a Culture for Safety is at Chapter 2). The safety of personnel and the environment are intrinsically linked to the Army's core values, the Army Leadership Code and business objectives.

6. Leaders and commanders must identify the S&EP risks in their AoR and establish safety management systems, processes and governance frameworks to manage them to ALARP⁴, ensuring a safe system of work/training is in place. Risk Registers must be produced that identify priorities, focus resources, allocate and record Responsibility, Accountability and Authority (RA2) and track risk mitigation. Subject Matter Expert (SME) advice from various stakeholders will

⁴ ALARP - "as low as reasonably practicable" - Reasonably Practicable involves weighing a risk against the trouble, time and money needed to control it. When these are judged to exceed any further control of the risk, then ALARP has been achieved.

underpin effective safety management and Army S&EP performance, allowing risks to be managed at the appropriate level with agile mechanisms in place for tolerance, treatment, transfer or termination as required.

7. Mechanisms are to be established to measure S&EP performance by analysing leading and lagging indicators, such as (not exhaustive):

a. Leading Indicators:

- (1) The extent to which plans and objectives have been set and achieved.
- (2) The appointment of staff leads and 'S&EP Champions'.
- (3) Publication of S&EP policies.
- (4) Sufficient trained and experienced personnel in supervisory posts.
- (5) Numbers of S&EP trained staff.
- (6) Number and quality of risk profiles and assessments.
- (7) Number and quality of Organizational Safety Assessments (OSAs)⁵.
- (8) Extent of compliance with risk controls (eg sufficient personnel, induction briefings, etc.).
- (9) Extent of compliance with statutory and regulatory requirements.
- (10) Frequency and effectiveness of S&EP assurance activity.
- (11) Frequency and effectiveness of S&EP committee meetings.
- (12) Personal protective equipment use (eg ear defence).
- (13) Number of Safety Cases signed off (dual signature).

b. Lagging Indicators:

- (1) Unsafe acts and conditions reported (including near misses).
- (2) Major accident, incidents and fatalities.
- (3) Sickness and injury-related absences.
- (4) Observations made by regulators (eg Enforcement Notifications).
- (5) Observations from assurance activity.
- (6) Observations made by personnel (eg whistleblowing).

DO

8. Effective safety management allows the Army to do safely what it wants and needs to do in the interests of Defence. S&EP risk management will normally involve several stakeholders and all are to understand their S&EP obligations; identifying, prioritising, managing and controlling the

⁵ DSA 01.1 Defence Policy Health, Safety and Environmental Protection - Chapter 4 contains a guidance note on the production of an OSA.

risks they are responsible for. Clear direction and appropriate supervision must be provided to meet those obligations. The Risk Assessment is an essential element of effective risk management by those directing and conducting hazardous activities; it is also a legal requirement.

9. Safe Systems of Work and Training must be identified for all activities, including routine activity. The Safe System of Work/Training (SSW/T) is explained at Chapter 3 and consists of:

- a. Safe Persons.
- b. Safe Equipment.
- c. Safe Practice.
- d. Safe Place.

10. **Safety Governance.** As part of the Army's SEMS all areas of the Army are to have structured and empowered safety governance structures that enable S&EP risks to be managed at the appropriate level. Commanders must set the example in energising safety governance, chairing meetings when appropriate to do so and taking an active leadership role in managing S&EP risks. Formation commanders and staff branch heads are to establish governance mechanisms that actively manage S&EP matters in their AoRs. An overview of Army HQ safety governance is at Chapter 7 and is outlined below:

- a. **Army Safety Committee.** The senior Army safety governance body is the Army Safety Committee (ASC) chaired by CGS. The ASC will sit annually (in March) and consider all S&EP risks held by CGS and key risks held by the 3* / 2* commanders. It will review the previous year's safety performance, confirm or amend Duty Holding arrangements, set priorities for the forthcoming year and refine Army S&EP policy. TORs for the ASC are at Annex A to Chapter 7.
- b. **Army Safety Sub Committee.** The ASC is supported by the Army Safety Sub Committee (ASSC) chaired by DCGS. The ASSC will sit biannually (May and November) and also consider risks held by CGS and the 3* / 2* commanders. It will enable DCGS to monitor progress against CGS's safety priorities and receive briefings on key and emerging safety issues. It will also serve to prepare DCGS for his attendance at the Defence Safety Committee. TORs for the ASSC are at Annex B to Chapter 7.
- c. **The Army Safety and Environment Working Group.** The ASSC will be supported by the Army Safety and Environment Working Group (ASEWG) chaired by CESO(A). The ASEWG will sit quarterly and monitor the progress of issues and action from the ASSC. It will also serve to introduce issues for potential elevation to the ASSC. TORs for the ASEWG are at Annex C to Chapter 7.

11. The Army has a legal and moral Duty of Care obligation for the health, safety and welfare of its personnel and those who might be affected by its acts or omissions. This obligation is universal (applied to all activities) and responsibility is vested in every individual from recruit to CGS. However, more is expected of commanders (from LCpl upwards) who direct and supervise activity to manage the risks they create and/or are confronted by. This is done by understanding the risks, making a judgement on whether the risk (potential adverse outcome) is worth the potential benefit and putting controls in place to reduce the risks to ALARP. The SSW/T is a useful framework and will, in most cases, reduce risk to ALARP and ensure Duty of Care obligations are being met.

12. Where the risks are significant, but the activity must be conducted in the interests of Defence (ie live firing, flying, arduous physical training, etc.) CGS may direct that in order to meet Duty of Care obligations the Duty Holding process is followed to add focus and emphasis to safety risk management and an improved gearing for risk elevation. This Duty Holding framework will clearly identify those with RA2 for the management of safety risk when conducting the prescribed activities

and provide a mechanism for its effective resourcing and elevation of ownership when required. In accordance with Defence Duty Holding policy, there will be three levels of Duty Holder:

- a. **Senior Duty Holder (SDH).** This will always be CGS and is the level at which ultimate RA2 is held. The SDH will direct which activities are subject to Duty Holding and the standards that are to be applied. Safety risk may be elevated from the ODH to the SDH as required; in some instances, significant risks may need to be held by the SDH, in others, the SDH may elevate the risk to SofS.
- b. **Operating Duty Holder (ODH).** This is the level at which CGS' intent and direction is applied within AoRs. Normally vested at the 2* level and appointed by the SDH. The ODH provides the safety management link between the SDH and those routinely conducting the activity at the Delivery level. The ODH will conduct 2nd Line of Defence assurance to ensure compliance with CGS' intent and direction, set standards and may direct resources to mitigate safety risk as required. Risk ownership may be elevated from the DDH to the ODH as required and the ODH may elevate risk to the SDH. ODHs will be expected to provide an annual report to the SDH on how Duty Holding safety risks are being managed and controlled in their AoR.
- c. **Delivery Duty Holder (DDH).** This is the level at which CGS' intent and the safety standards to be applied are delivered by the appointed DDH; this is normally COs or in some cases independent sub-unit commanders⁶.
- d. Below the DDH, commanders at all levels are to ensure that a SSW/T is in place for all activity. As directed by the DDH, additional scrutiny and control are likely to be applied to those activities prescribed for Duty Holding and 1st Line of Defence assurance should be focused accordingly in meeting CGS' intent. Commanders must maintain a SSW/T. Where this cannot be maintained, but the activity must continue in order to accrue benefit, consultation with the DDH is required and the safety risk may be elevated if necessary.

13. The ASC and ASSC will provide the forums at which the activities requiring Duty Holding are identified, confirmed and monitored. Commanders and SMEs can offer opinion to either committee on the requirement for Duty Holding. Full details of the Army Duty Holding policy are at Chapter 4 and a DH training course is available on the [DLE Code 101](#). Duty Holding training is valid for 3 years and should be refreshed if Duty Holding responsibilities endure beyond that time.

14. **Safety Responsibilities/Organization.** The following personnel have key roles in S&EP management.

- a. **CGS.** CGS sets the standard for Army S&EP and is ultimately responsible for the Safety of all Army TLB personnel. He is supported in this role by the Chain of Command and the Executive Committee of the Army Board, which is briefed quarterly by the Army Inspector on the Army's S&EP performance. CGS chairs the Army TLB senior safety forum, the annual ASC, which considers Army S&EP risk management and performance, refines policy and sets safety objectives and priorities.
- b. **DCGS.** DCGS is the Army's 'Safety Champion'. He chairs the biannual ASSC, which monitors Army S&EP risk management and ensures CGS's direction and guidance is being applied. He represents the Army on the tri-annual Defence Safety Committee (DSC).
- c. **Army Inspector.** The Army Inspector ensures appropriate 3rd Line of Defence assurance and regulation for all Army activity across Defence and ensures the Army's

⁶ Specific arrangements are to be agreed and applied in the Collective Training Environment.

activities are appropriately compliant with statutory and regulatory requirements. He ensures the Army is demonstrably rigorous and effective in self-regulation⁷.

d. **Chief Environment and Safety Officer (Army) (CESO(A)).** CESO(A) is the Army's S&EP SME and works directly to DCGS. He maintains the Army's Organization and Arrangements for S&EP within the SMS, ACSO 3216. He advises staff branches and the chain of command on S&EP issues and is the Army's link to the DSA, HSE and EA. He manages the Army Incident Notification Cell (AINC), ensuring that safety-related data is effectively collated and available for analysis and Lesson Learning. He communicates key S&EP messages throughout the year, including a biannual magazine, guides and DVDs. He produces an Annual Assurance Review on S&EP and routinely monitors S&EP performance for trends and weak signals. CESO(A) conducts 2nd Line of Defence assurance in accordance with ACSO 9001 and sub-ACSO 9016.

e. **Commander Field Army (CFA) and Commander Home Command (CHC).** CFA and CHC set the standards for S&EP in their respective AoRs chairing S&EP committees as necessary. They ensure CGS' direction and priorities are followed and that robust management mechanisms are in place for the management of S&EP risk. They are to ensure that an appropriate safety culture exists and that all subordinate commanders understand their intent regarding S&EP risk management. They are to ensure effective procedures are in place for the identification of safety lessons to facilitate learning from experience, sharing that learning when it applies beyond their AoR.

f. **Army HQ 2* Directorates.** 2* Directors have RA2 for safety-related activity and policy in their respective areas which are aligned to their function in the AOM. They are to familiarise themselves with their responsibilities, authorities and accountabilities and ensure a suitable and sufficient governance framework exists to meet those obligations. This will include, but is not limited to: Training Requirements Authority (TRA), equipment safety (including Part 3 Safety Case dual signature), attendance at safety-related meetings and committees (eg SEMP, SEMC, etc.), defining safe practice and procedures (eg Pamphlet 21 for Live Fire Training), Army Competent Advisors and Inspectorate (ACAI) responsibilities, providing subject matter expert advice to the chain of command and Duty Holders, highlighting infrastructure safety risks (including fire and fuel and gas installations) and the means to control such risks. Capability Management – Roles and Responsibilities is covered in detail at Chapter 6.

g. **Chief Engineer (Army) (CE(A)).** CE(A) provides the Army's engineering safety focus. He is the principal advisor to stakeholders on in-service technical engineering and maintenance issues and equipment safety matters. He chairs the Land Systems Safety Working Group (LSSWG) and the Army Engineering Committee.

h. **1* and 2* Commanders⁸.** Commanders at this level set the standard for S&EP in their respective AoRs. They ensure CGS' and other superior commanders' intent, direction and priorities are followed and that effective S&EP governance frameworks are in place. They have a key role in ensuring an appropriate safety culture exists in their AoR and that subordinate commanders understand their S&EP risk management intent. They are to ensure effective procedures are in place for the identification of safety lessons to facilitate learning from experience, sharing that learning when it applies beyond their AoR. 2* commanders are ODHs and 1* commanders have oversight responsibilities for their DDHs for specified activities and are to conduct 2nd Line of Defence S&EP assurance activity. Commanders are supported in their S&EP roles by SMEs and are normally established for S&EP qualified Force Protection and EP staff that can provide specialist advice. Where these do not exist, Commanders are advised to nominate a focal point and a senior officer as a S&EP proponent – a 'Safety Champion'. Force Protection staff must read and understand

⁷ Army Insp SO1 H&S is to review this ACSO for regulatory compliance annually.

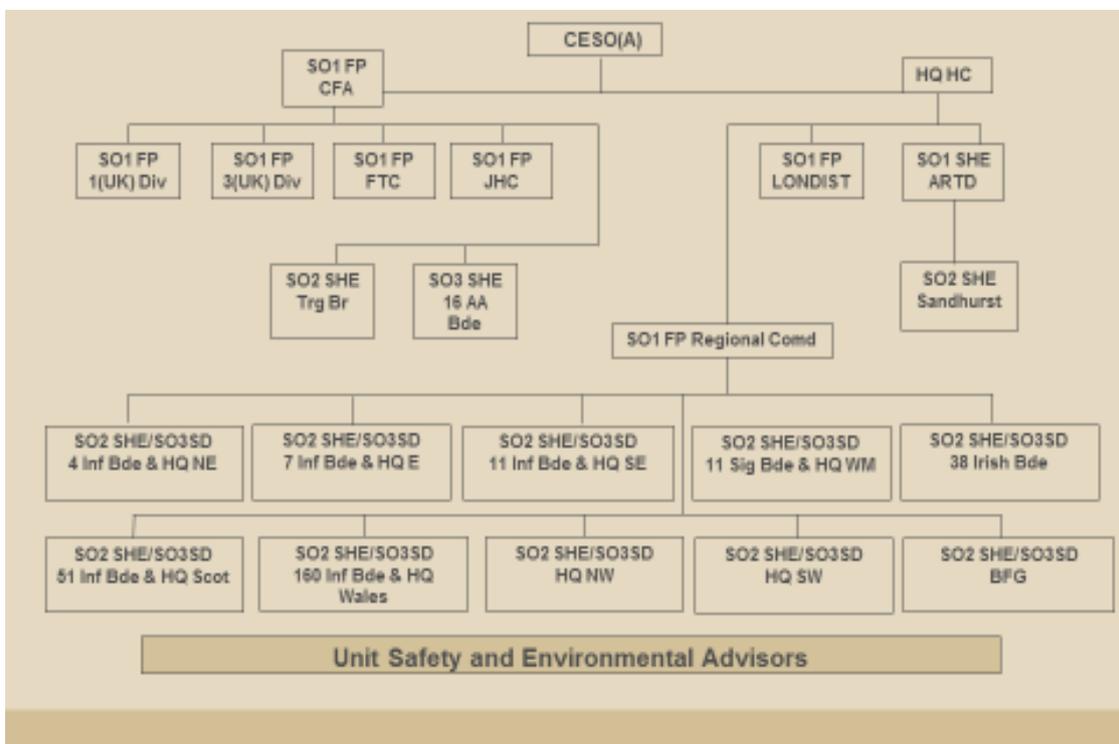
⁸ Including Comd JHC.

HSE guidance ([HSG65 PDF: Managing for Health and Safety](#)) whilst commanders and Command Group/Board members should be familiar with the key principles.

i. **Unit Commanders.** As those closest to the conduct of hazardous activity, unit commanders have a key role to play in Army S&EP. They set the standards for S&EP in their respective units and must ensure their superior's direction and priorities are followed. They are to establish effective systems and governance for the management of S&EP risk, ensure an appropriate safety culture exists and that all subordinates understand their intent. Unit Commanders are to conduct 1st Line of Defence assurance of their unit and are advised to conduct spot checks of Risk Assessments and other S&EP documentation in order to ensure standards are maintained. Units considered 'High Risk' are appointed an FTRS (HC) Unit Safety and Environment Advisor (USEA) to provide specialist S&EP advice. USEA liability, managed by CESO(A), is capped. All units without a dedicated FTRS USEA must appoint an officer to lead on S&EP management and are advised to appoint a senior officer (eg 2IC / QM) as a S&EP proponent – a 'Safety Champion' – who is to fulfil the role of the USEA.

j. **Officers and NCOs.** This is the most important level as it is where risk is most apparent and intervention most critical. Good S&EP performance is achieved by commanders at all levels, but particularly at the junior levels, understanding their Duty of Care obligations for managing risk for those employed under their command (and others affected by acts and omissions). This is particularly important if and when the situation changes and requires a dynamic review of the Risk Assessment. Junior commanders must be trained for their respective roles and understand how those roles are to be conducted safely. They have a duty to stop or pause activity if they feel it has become dangerous and is no longer controlled to the correct standard; this is particularly pertinent when a situation has changed or a 'last minute good idea' becomes apparent. Whilst initiative and innovation are encouraged, due consideration must be given to the risks to personnel and the environment.

15. **Organization.** The Organization of safety staff is shown in the picture below:



16. **Safety Responsibilities/Arrangements.** The table below sets out S&EP governance responsibilities:

Task	Conducted By
Appoint a S&EP Champion to the Command Board. COS/ DCOS/2IC, or an officer of similar status, is to be appointed the Board's S&EP Champion.	Fmn, Unit, HoE
Establish a Safety Committee. Ensure that the S&EP committee meets on a regular basis and is chaired by the Commander/S&EP Champion (at least once per year).	Fmn, Unit, Sub Unit, HoE
MS Recognition. Ensure that subordinate commanders' job specifications set out S&EP responsibilities and ensure, where possible, that annual appraisal reports reflect S&EP leadership and management.	Fmn, Unit, Sub Unit
<p>Publish signed and dated S&EP Statement. Unit O&A policy must include the following:</p> <ul style="list-style-type: none"> a. Reference to the extant Secretary of State for Defence's Policy Statement and CGS's Policy Statement. b. A reflection of the personal commitment of the Comd/CO to S&EP. c. Demanding the personal commitment to S&EP of the subordinate command chain. d. The requirement for the prevention of harm, injury, loss and ill health that are based on the systematic identification of health and safety/fire hazards through detailed risk assessment. e. The arrangements for providing Control, Cooperation, Communication and Competent workforce (4Cs) for lodger units, contractors and visitors in accordance with JSP 375 Part 2, Vol 1, Chap 34. For lodger units, this is to be underpinned by a duly signed Memorandum of Understanding. f. The arrangements for the investigation of accidents and near misses in order to provide a mechanism to identify and learn lessons to ensure the prevention of recurrence. 	Fmn, Unit, HoE
Safety Performance Measurement and Review. Ensure that safety performance measurement occurs and that it is reviewed in detail by Safety Committees.	CESO(A), Fmn, Unit, HoE
Reporting. Encourage a reporting culture and ensure that all adverse events, including near misses, are reported to the Army Incident Notification Cell (AINC) in accordance with Chapter 8.	Fmn, Unit, HoE
Create a Just Safety Culture. A strong S&EP culture is at the heart safety performance. Setting standards, demonstrating S&EP leadership, recognising and rewarding good behaviour and taking appropriate action against reckless behaviour or deliberate non-compliance, combine to ensure the right culture is achieved.	Fmn, Unit, HoE
Appoint a Unit Safety and Environment Advisor. Each unit must appoint a Unit Safety Advisor to take the lead on S&EP management. The nominated person must be trained on the All Arms Unit Safety Advisor Course or equivalent ⁹ . This appointment is still required even if the unit is established for a CESO(A)-appointed FTRS USEA.	CESO(A), Unit
Consultation. Ensure that their personnel, whether military or civilian, are consulted on Safety issues through Site Safety Meetings.	Fmn, Unit, HoE
<p>Operate Safely. Operate within the Safe System of Work (SSW)/Safe System of Training (SST) whenever possible (Chapter 3). When not possible, treat (suitable controls to achieve a 'safe system'), transfer (elevate) or terminate (cease) the risk. Always ensure supervision is in place and that dynamic risk assessments are conducted if the situation changes.</p> <p>The Risk Referral and Dispensation Process is described at Chapter 5.</p>	All

⁹ This includes the Safety Advisors Course held at the REME Arms School.

17. In addition to the responsibilities set out above, commanders in overseas locations, including Defence Attaches are, so far as is reasonably practicable, to publish a command level S&EP O&A policy that draws together UK and Host Nation requirements for compliance by all employees of the command, irrespective of their parent TLB or budgetary status.

18. All military personnel, civilian employees, contractors and visitors are to take reasonable care of their own safety and that of others who may be affected by their acts or omissions at work. All accidents, near misses, serious equipment failures or unsafe practices are to be reported in accordance with Chapter 8.

19. **Competence and Qualifications.** The TRA sets the standard for Special-to-Arm and equipment specific training. This is assured and monitored by the appropriate ACA&I who have the overall responsibility for setting the safe standards by which capability is provided. Competence is a vital element of Safety. It is achieved by ensuring that all personnel, commensurate with the task, are qualified, experienced, current and mature, and that they are appropriately supervised.

20. Specific S&EP training is to be carried out as follows:

Ser	Organization	Training Requirement	Remarks
1	CESO(A) staff.	Advanced Diploma (Level 6) in Occupational Health and Safety (OSH).	All SO1/C1 (Minimum 2 staff holding Level 6). Safety CPD is to be used to retain Competency.
2	SO2 EP (CESO(A)).	Institute of Environmental Management and Health.	EP CPD is to be used to retain Competency.
3	SO1/C1 Force Protection.	Initially NEBOSH General Certificate in OSH Level 3 H&S (NGC OSH 3), but must ultimately hold Diploma Level 6 in OSH. The Army Equipment Safety Training for Cap Staff (online via DLE).	Safety CPD is to be used to retain Competency.
4	Chief Engineer (Army).	The Army Equipment Safety Training for Cap Staff available on DLE Code CDSCM101 . System Safety in Action (completed online plus attendance at a workshop). NEBOSH General Certificate in OSH Level 3 H&S (NGC OSH 3) and, where possible, to Diploma Level 6 in OSH.	Full details of the System Safety Training suite of courses are here ; this includes the System Safety in Action course.
5	HoC - Safety and Assurance staff and appointed ACAI safety posts within HoCs.	The Army Equipment Safety Training for Cap Staff (online via DLE). The link to the online course is here . System Safety in Action (completed online plus attendance at a workshop). NEBOSH General Certificate in OSH Level 3 H&S (NGC OSH 3) and, where possible, to Diploma Level 6 in OSH.	Full details of the System Safety Training suite of courses are here ; this includes the System Safety in Action course.
6	HoC - Staff officers who represent the HoC at Safety Panels, together with those that provide policy, direction or advice that allows the Part 3 Safety Case to be completed.	The Army Equipment Safety Training for Cap Staff (online via DLE). The link to the online course is here . System Safety in Action (completed online plus attendance at a workshop).	Where a greater understanding of the acquisition process is required ¹⁰ , those personnel must attend the System Safety Process Management (completed online plus attendance at a workshop). Typically,

¹⁰ These will be the designated Safety Critical posts.

			this will include HoC staff officers attending in-service safety panels/safety committees, Capability Integration Working Groups and Availability Working Groups. Job Descriptions must include the relevant training applicable to that post. Full details of the System Safety Training suite of courses are here ; this includes the System Safety in Action course.
7	Bde SO2/C2 SHE.	NEBOSH General Certificate in OSH Level 3 H&S (NGC OSH 3) and, where possible, to Diploma Level 6 in OSH.	
8	Commanding Officers	Mandatory attendance on the Commanding Officer's Designate Course, Duty Holder training and online training courses provided by DLE.	
9	USEA.	NEBOSH General Certificate in OSH Level 3 H&S (NGC OSH 3).	
10	Nominated Safety leads within units.	All Arms Unit Safety Advisers Course.	
11	Officers.	All officers are to undergo safety training at RMAS and on career development courses and pre-employment training.	
12	NCOs.	All soldiers selected for promotion to JNCO and SNCO will undergo Safety Management and Risk Assessment training as part of the CLM syllabus.	
13	Recruits and Soldiers.	All personnel will undergo the safety Workplace Induction Package (WIP) on joining the Army and every 3 years thereafter. Other safety training as directed by COs.	
14	Mandated Unit S&EP Trained personnel.	As set out in Army Training Branch's Compendium of Mandated Training.	To include DSEAR DLE learning for relevant staff.

21. **Other Services.** RAF and RN personnel under OPCOM, OPCON or ADCON will conform to their Single Service training standards. The chain of command is to be notified if any deficiencies are identified or if other Service standards conflict or are at odds with those of the Army. The matter can be referred to CESO(A) if necessary.

22. **Communication and Collaborative Effort.** Good Safety Management relies on mechanisms being established to facilitate regular consultation and cooperation on Safety issues. Chains of Command are to ensure such forums exist at levels commensurate with the level of risk. Views from the 'coal face' and from SMEs are vital to ensuring that maximum benefit is derived from such meetings, which must be chaired by commanders (IC, OC, CO, HoE, Comdt, Comd, etc.). Where occupancy and/or activity is shared, such as with Cadets, other units, contractors, etc., the other user(s) must attend the safety meetings; the '4Cs' principle applies (see HSE link [here](#)) and Risk Assessments must account for all user groups. Mechanisms for anonymous reporting of Safety concerns are encouraged to ensure that potentially contentious issues can be raised without fear of sanction. In addition to programmed Safety meetings, 'extraordinary' Safety

meetings are encouraged prior to and after a major event, such as an exercise or complex road move, in order to ensure that risks are/were identified and effectively managed and lessons learnt and communicated effectively. In addition to dedicated Safety meetings, Command Groups, Committees and Management Boards are recommended to have Safety as a standing agenda item to ensure that key Safety issues are brought to the attention of commanders.

23. Routine Safety messaging from Army HQ will be coordinated by CESO(A) – SO2 Comms, who will ensure the following:

- a. A Safety link is maintained and updated on the Army website.
- b. An entry is made on the CESO(A) Facebook page (where permissible).
- c. Key issues are highlighted in the CESO(A) 'Safety and Environment Matters' magazine.
- d. CESO(A)/DSA safety notices are promulgated through the CoC.

CHECK

24. **Assurance, Audit and Inspection.** [ACSO 9001](#) provides details of the Army's Assurance framework, illustrating the new assurance taxonomy and the division between 1st, 2nd, 3rd and 4th Lines of Defence assurance. The new model allows commanders to manage risk according to context and learn from genuine errors whilst not accepting negligence or recklessness. CESO(A) retains an audit capability and remains the proponent and ACAI for S&EP. As such, CESO(A) will set appropriate standards for the Army to which it must operate and against which internal control measures will report. These are categorised as follows:

- a. Must (non-discretionary) – directed by legislation or safety critical activities informed by current risk appetite.
- b. Should (discretionary) – directed by Defence or Army policy.
- c. Could (recommended) – good practice as identified by the Proponent.

25. CESO(A) will make recommendations on the most effective and efficient internal control measures required to provide the necessary level of assurance to the chain of command and will continue to monitor and analyse S&EP performance remotely using MIS. CESO(A) will be responsible for reporting to CGS, through the Army Inspector, for tracking the extent to which the chain of command is complying with the policy set out in ACSO 9001. SO1 Audit, CESO(A), has identified triggers that would prompt a CESO(A) audit of a unit or formation and these are published in [ACSO 9016](#).

26. **Organizational Change.** Organizational change must not be detrimental to safety. In accordance with DSA 01.1 - Chapter 4 an OSA must be undertaken when major Organizational change is being considered. This involves base lining the present safety arrangements/procedures and verifying that the proposed Organizational change does not undermine safety. More guidance is published in DSA 01.2 Chapter 7.

27. **Accident Investigation.** Responsibility for investigating all MOD fatalities and some serious accidents and incidents falls to the Defence Accident Investigation Branch (DAIB). Upon notification of an accident or an incident involving Army personnel, the DAIB will liaise with the Army Personnel Support Group (APSG) to discuss if the event meets the DAIB threshold for investigation and possible Service Inquiry. If it does, the DAIB will conduct the investigation and pass safety recommendations to CESO(A) for input onto the Defence Lessons Information Management System (DLIMS). Irrespective of any Def AIB investigation, APSG will always ask affected units for a Learning Account and may conduct their own Non-Statutory Inquiry (NSI) into

the event. Lessons are then tracked through the monthly Army Lessons Safety Fusion Group, which is attended, by APSG, CESO(A), Land Warfare Centre and the Army Inspectorate.

ACT

28. **Learning Lessons.** The Army must be able to demonstrate that it is a learning Organization. The process by which safety lessons are tracked, managed and closed is conducted in accordance with ACSO 1118. It is vital that S&EP lessons are also learnt at the lowest levels, particularly from near misses that often precipitate more serious accidents.

29. **External Enforcement.** The Army is subject to the HSAWA and the Corporate Manslaughter and Corporate Homicide Act 2007 – although certain exemptions are in place. However, the HSE has undertaken not to pursue individuals for prosecution when failings have occurred in the course of a duty, but will seek to prosecute the MOD under the concept of vicarious liability. The HSE will seek to issue a Crown Censure to the MOD where it can demonstrate that a similar failing by a corporate body would have likely resulted in a successful prosecution. CGS, or his nominated representative, will attend the Crown Censure and be supported by CESO(A). In extremis, where individuals are considered to have acted negligently, they may be liable to prosecution.

30. **Internal Enforcement - Defence Regulators.** Defence Regulators, working on behalf of DG DSA, regulate areas of Defence that have DEDs from civil legislation. They have enforcement powers but do not have powers of prosecution. Further details are in DSA 01.1 Chapter 7.

31. **Environmental Protection (EP).** Whilst responsibility for a large component of EP sits with the Defence Infrastructure Organization (DIO) as infrastructure providers and maintainers, the Army has a responsibility to ensure that its practices and procedures are EP compliant and that any incident is effectively managed. JSP 418 requires an Environmental Management System (EMS) system to be put in place that is based on ISO 14001¹¹. A bespoke Environmental Management System for Army Sites (EMSAS) pamphlet has been produced that provides a systematic approach to EP that is to be established at unit level. EMSAS identifies unit activities, which could have an environmental impact and thus enables effective management and regular review. The EMSAS pamphlet is [here](#).

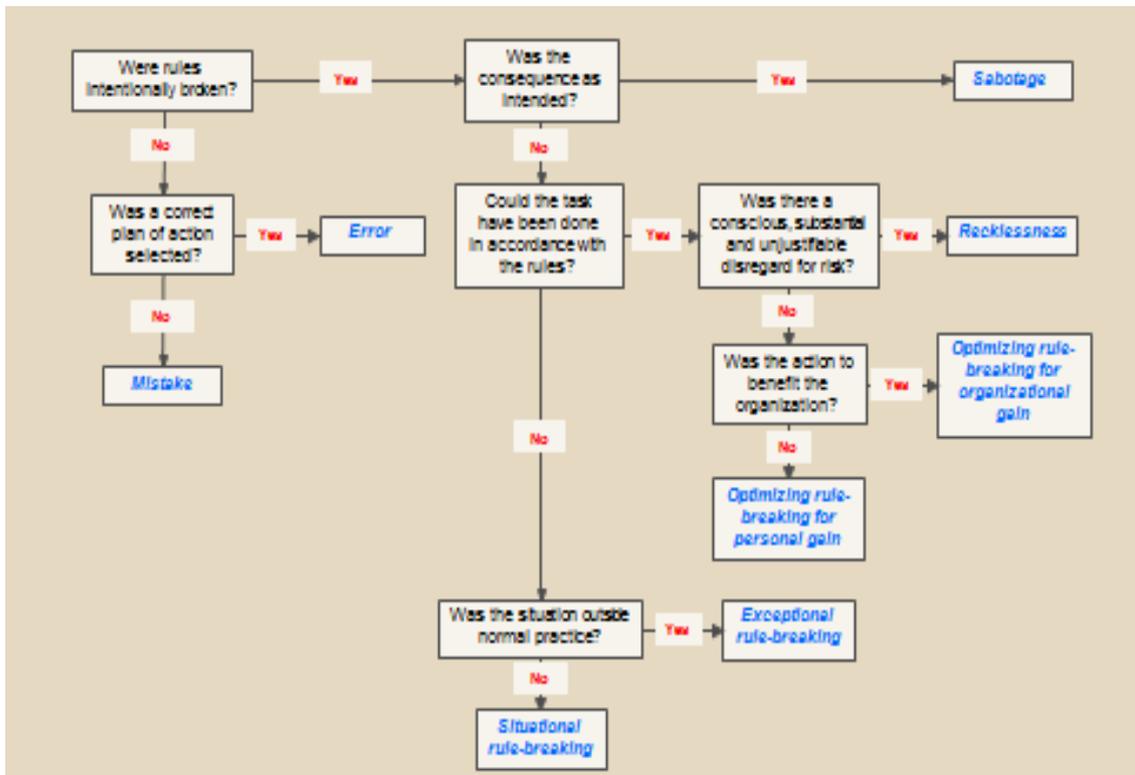
¹¹ ISO 14001:2015 sets out the criteria for an environmental management system; such a system can be certified to this standard. This ISO maps out a framework that a company or organization can follow to set up an effective environmental management system. It can be used by any organization regardless of its activity or sector.

CHAPTER 2

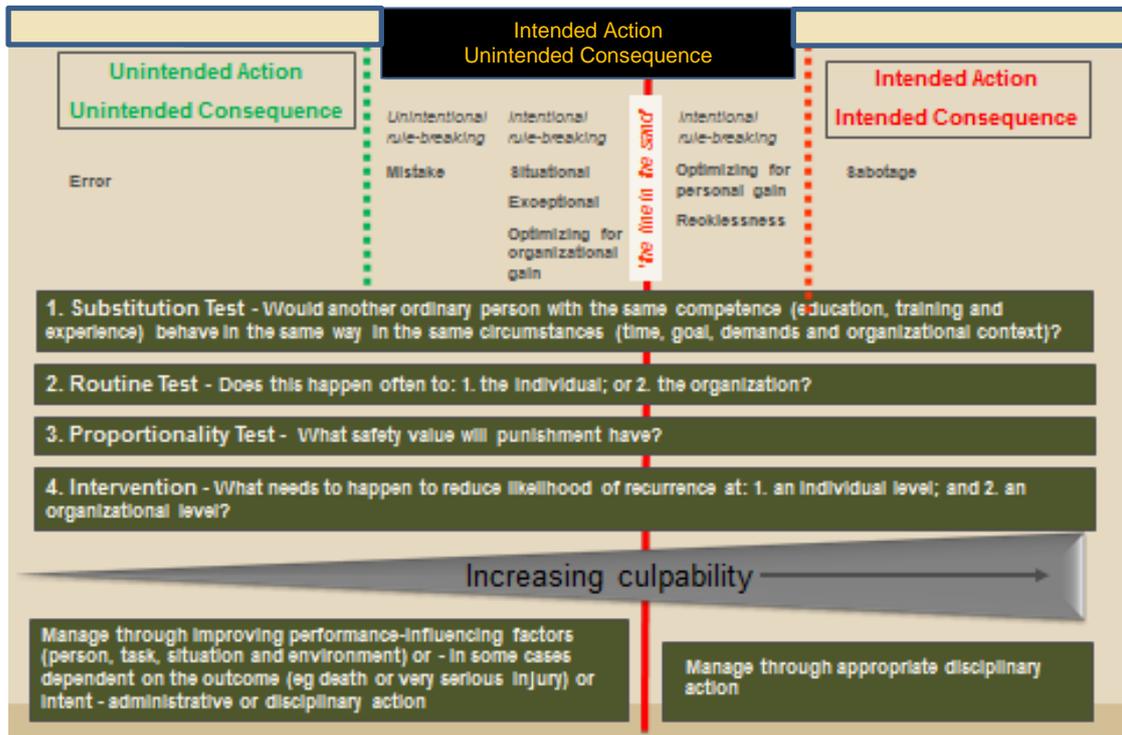
ARMY CULTURE FOR SAFETY

1. The HSE states that: *Culture is best understood as "the way we do things around here". Culture forms the context within which people judge the appropriateness of their behaviour. An Organization's culture will influence human behaviour and human performance at work. Poor safety culture has contributed to many major incidents and personal injuries.*
2. The Army faces an arguably unique challenge. It wishes to promote a strong safety culture, comply with the law, demonstrate a duty of care to its people and minimise avoidable losses. At the same time, it must retain its ethos of boldness and spirit of initiative and calculated risk taking that can often be decisive on operations.
3. The key to resolving this dilemma is sound judgment; understanding when it is desirable to take additional risks in order to achieve a successful outcome as the gains outweigh the potential cost, and when it is prudent to take a more measured approach to safety risk as the gains are not worth the potential cost.
4. In peacetime, the safety of personnel is a leadership and management function that has its roots in legislation; we are breaking the law if we do not manage risk correctly. It may, at times, feel counter-cultural to insist on good safety behaviour in barracks, on the training area or when conducting sport and AT when mindful of the extreme hazards that Army personnel may face, or have recently faced, on combat operations. However, it must be recognised that safety is ultimately a Force Protection measure. There is certainly no place for courting popularity by mocking good safety behaviour when one considers the costs to the individual and the Army if we get it wrong. **To permit poor behaviour is to promote it** – so strong leadership is required in developing a mindfulness of safety and insistence on good behaviour.
5. Generating a strong culture is not something that can be fixed in a defined timeframe and then put aside; it is a journey, not a destination. A key component of a strong safety culture is its Just nature. Good behaviour must be recognised and rewarded whilst poor, or reckless, behaviour must be dealt with. Therefore, in responding to an incident or apparently reckless behaviour, it is important to understand the causal factors: why it happened or is happening. By doing so, it is possible to respond in a way that engenders a Just Culture and contributes to strengthening safety culture. The charts below illustrate a suggested methodology:

Just Culture – Flowchart Analysis of Investigation Results (FAIR)

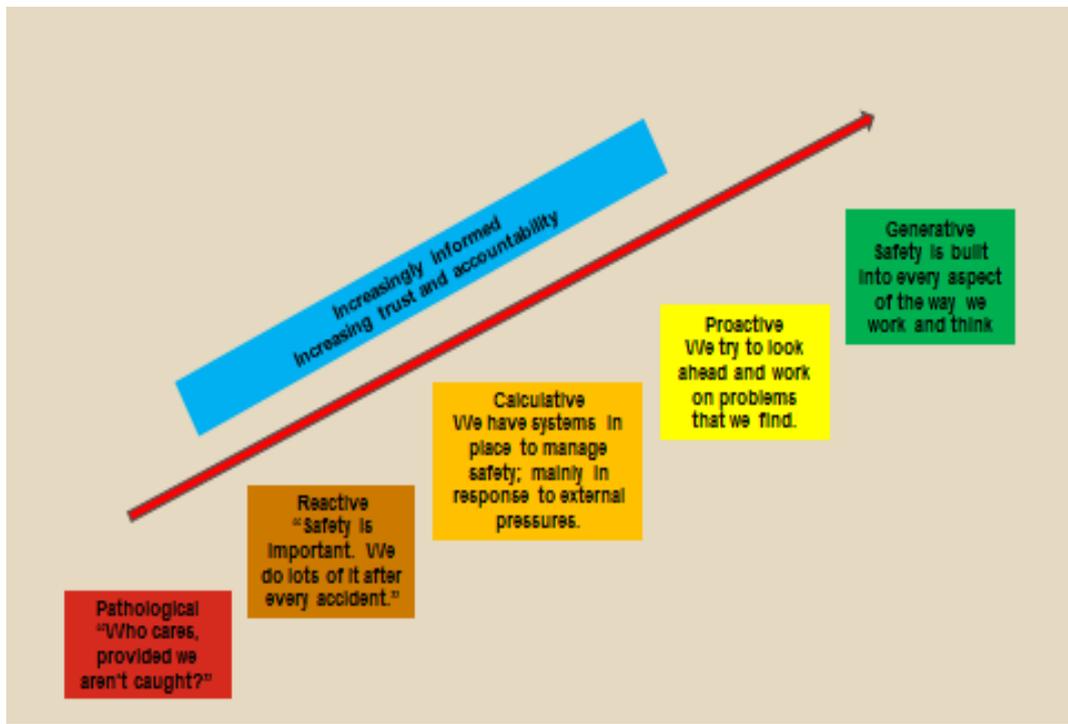


FAIR - System



6. Another key activity in improving safety culture is to understand what culture an Organization currently has and what sort of safety culture it wants. The image below presents a suggested safety culture spectrum. It is likely that across the Army there is evidence of behaviour from every part of the spectrum. The challenge is to pull more behaviour away from the Pathological and towards the Generative.

Safety Culture Spectrum



7. The table below is an adaptation of a similar table produced by the HSE on how managers (commanders) can improve safety culture:

A healthy safety culture is where there is...	This is shown when commanders...	And is helped when commanders...
Visible commitment to Safety by the chain of command.	<ul style="list-style-type: none"> ➢ Make regular useful visits to units and establishments. ➢ Discuss safety matters with all ranks. ➢ Commits resources to Safety, including Safety workshops and audits. ➢ Does not tolerate violations of procedures. 	<ul style="list-style-type: none"> ➢ Make time to visit units and establishments (not just after an accident). ➢ Demonstrate commitment. ➢ Actively set an example in conforming to Safety procedures.
Participation at all levels and ownership of Safety problems and solutions.	<ul style="list-style-type: none"> ➢ Consult widely about Safety and Health matters. ➢ Do more than the minimum to comply with the law. ➢ Seek all rank participation in setting objectives and investigating incidents. 	<ul style="list-style-type: none"> ➢ Lead and support active Safety committees. ➢ Have a positive attitude to Safety staff and concepts. ➢ Provide the means and encouragement for an all-informed approach to Safety where everyone feels they can speak up without fear of reprisals.
Trust between commanders and	➢ Respects the health and	➢ Establish a Just Safety

the commanded.	<p>safety of personnel.</p> <ul style="list-style-type: none"> ➤ Show good judgment when balancing risk and task needs. ➤ Encourage others to raise any concerns they have. 	<p>Culture that recognises good behaviour and assigns blame only where someone has been clearly reckless.</p> <ul style="list-style-type: none"> ➤ Act on concerns raised, justifying their response if necessary.
Good communications.	<ul style="list-style-type: none"> ➤ Provide clear, concise and relevant Safety policy, guidance and information. ➤ Regularly communicate with their personnel, listening and acting on feedback. 	<ul style="list-style-type: none"> ➤ Communicate the Safety message via a number of means. ➤ Actively seek feedback
A competent workforce.	<ul style="list-style-type: none"> ➤ Ensure that personnel are properly trained for the tasks they are asked to conduct. 	<ul style="list-style-type: none"> ➤ Conduct proper assurance checks on training requirements. ➤ Ensure personnel are current on the tools, equipment and techniques they will be expected to use.

CHAPTER 3

SAFE SYSTEM OF WORK / TRAINING

1. Health and Safety legislation requires all activities to be conducted within a Safe System of Work (SSW). In the military context, there are three similar but distinct SSWs, which are the standard SSW, the Operational SSW (OSSW) and the Safe System of Training (SST):

a. **SSW¹**. In order to ensure uniformity of practice and clarity of implementation, all military SSWs consist of a common format which is broken down into 4 parts:

(1) **Safe Persons.** Personnel who have been given the appropriate information, instruction, training and supervision to enable them to carry out a specific activity as a competent person with the appropriate qualification, currency, maturity and experience.

(2) **Safe Equipment.** Equipment brought formally into Service together with the associated documentation and underpinned by a Safety Case to ensure its safe use by a competent person. Where no Safety Case exists, any equipment hazards must form part of the activity-specific Risk Assessment.

(3) **Safe Practice.** The safe conduct of any activity, including those arising from the use of equipment, in a specific location, by competent Persons. Safe Practice is normally contained in documentation, eg Pamphlet 21 for Live Fire Training.

(4) **Safe Place.** This is the space to be occupied by the military for the conduct of their activities and includes any surrounding areas together with any military or civilian population which might be affected by those activities. The Safe Place must form part of the activity specific Risk Assessment taking into account the proposed use of the space and controls put in place.

b. **OSSW.** Using the Standard SSW format, the OSSW ensures activities are conducted on operations, taking into account the operational realities. Within the OSSW, there may be risks, resulting from certain hazards within the operational environment, which have to be accepted due to limits on the controls which could be put in place to reduce the risk. Responsibility for accepting the increased level of risk lies with the appointed ODH and all decision making must be recorded.

c. **SST²**.

(1) The SST, using the standard SSW format when conducting any training activity, takes into account that those under training cannot be deemed Competent. It enables the Army to meet its training requirement to ensure that personnel are prepared for operational roles whilst maintaining risks at ALARP. It is essential that those who direct and manage the training are competent.

(2) The acceptable level of training risk is set by the appropriate ODH who owns the training audience.

2. This Chapter is intended to assist Commanders manage the balance between the safety risks faced and potential benefits that may accrue. Commanders must integrate risk management

¹ JSP 375 Part 2 Volume 1 Chapter 8 refers.

² JSP 375 Part 2 Volume 1 Chapter 40 refers.

into their planning and estimates, ensuring that controls are in place to ensure risks in hazardous training and activities are managed to ALARP.

Duties

3. **Commanders.** Commanders have a personal responsibility for ensuring that activities are conducted in accordance with Service Instructions, Regulations, Defence Codes of Practice (DCOP), Directives and Policy while taking due regard to any risks to personnel. This responsibility cannot be delegated. The mechanisms for discharging this duty may be delegated and assistance and support obtained, but legal responsibility remains with the MOD through its Chain of Command.
4. Commanders, normally Commanding Officers, who direct activity, are to ensure that:
 - a. Activity takes place in a manner that is as safe as is reasonably practicable, in accordance with current Service Instructions, DCOPs, Policy, Regulations and Directives.
 - b. DCOP, Service Instructions, Policy, Regulations and Directives applicable to the training activities are complied with in full and are communicated to those supervising and delivering the training, as well as those undergoing training.
 - c. The SSW is applied to every activity, including activity undertaken on operations³. If the particular activity is not already covered by an existing SSW, an activity-specific risk assessment covering all areas of the SSW must be undertaken and any control measures required must be implemented in full.
 - d. Those being trained are informed of the hazards they will face during the training.
 - e. When, as a result of a risk assessment, the residual risk cannot be adequately controlled within the SSW and the activity is routine and enduring, and deemed necessary to maintain operational effectiveness, the Commander obtains the relevant approval for the activity to take place via the Duty Holder chain.
 - f. If a Commander wishes to deviate from Service Instructions, DCOP, Policy, Regulations and Directives, particularly if it involves live fire training, and the activity is deemed necessary to maintain operational effectiveness, the Commander must obtain ODH authority for the activity to continue.
 - g. The effects of any changes to proposed exercises, particularly exercises in progress, are subjected to further risk assessment before implementing any change. All evidence must be kept for auditable purposes.
5. **1* Commanders.** 1* Commanders must study the submissions made by their subordinate Commanders for activities carrying significant risk that cannot be managed within the SSW. If the Defence benefit is critical, the 1* Commander can suggest and/or resource additional controls to bring the activity back to within a SSW or elevate the submission to the 2*/3* level, otherwise moderate the directed training requirement to reduce the risk. 1* Operational Theatre Commanders are permitted to authorise Operational Dispensations. An Initial Operational Dispensation may be granted for a period of 28 days whilst an Urgent Statement of User Requirement is developed and the submission is then considered by the force generating 2* Commander and the relevant Safety and Environmental Committee⁴.
6. **2* Commanders.** The force generating 2* commander must study submissions made by the force generating 1* wishing to deviate from Service Instructions, DCOPs, Policy, Regulations and

³ It must also be acknowledged that the activity may be influenced by an adversary.

⁴ DSA 03.DLSR.LSSR - DCoP G provides details of the Operational Dispensation process.

Directives, particularly if it involves live fire training. If the Defence imperative is identified and following advice from the relevant Safety and Environmental Committee, they are satisfied that the risks are tolerable to them, they can approve the activity. It is normally only the force generating 2* commander who can approve such activities and approvals must be documented.

7. **Persons Undergoing Training.** Personnel undergoing training are not considered Competent until they have met the test of Qualification, Currency, Experience and Maturity and shall adhere to any instructions delivered before or during training. The level of supervision and competency of those instructing and supervising will be directed by the appropriate commander or Duty Holder. Trainees are to adhere to all instructions.

8. All risk assessments, together with the resultant control measure instructions, are living documents. Reviews must be carried out:

- a. If there is reason to suspect that the risk assessment is no longer valid.
- b. If there are significant changes to the activity.
- c. Annually.
- d. Immediately following any accident or incident.
- e. If there are changes in policy that affect the activity.
- f. If training is being delivered by a foreign nation and not the appropriate NATO Standard.

9. Redundant risk assessments must be retained for 3 years.

Managing the SST

10. The SST consists of the four separate elements shown in Paragraph 1a above, where the hazards have been assessed and the consequent controls have been approved at the highest level and integrated into formal procedures in order to reduce the risks to the ALARP condition within the constraints imposed by the Training Imperative.

11. **Safe Persons.** A Competent person within the SST is deemed competent by virtue of qualifications, currency, experience and maturity. It is essential that Commanders ensure instructors are competent and given the appropriate level of supervision to ensure that the delivery of training matches the ability of the trainee and complies in full with the SST.

12. **Safe Equipment.** Equipment, (including explosives and ammunition), is brought into service following a Safety Case, with appropriate documentation defining the safe operation and maintenance of the equipment under Service conditions. Commanders must ensure that their subordinates have, and make use of, the correct equipment to carry out an activity. Commanders must ensure that equipment used both by instructors and those under training is operated and maintained as laid down and ensure that only competent persons are allowed to operate and service the equipment. Complete training and maintenance records must be kept.

13. **Safe Practice.** Practices are conducted in accordance with drills and instructions laid down by the Service authorities. Drills and procedures, taking into account the Training Imperative, are identified in the equipment safety case and developed in accordance with the Systems Approach to Training (SAT). Safe Practice includes following correct procedures, effective training and supervision, the provision of warnings and the use of Personal Protective Equipment (PPE). It is essential that all training is closely supervised by a competent person to ensure that procedures are strictly adhered to.

14. **Safe Place.** A Safe Place is one in which the controls necessary to enable authorised training to be conducted safely, have been identified by a site specific risk assessment, and directed through appropriate Standing Orders such as Range Standing Orders.

Persons at Risk during Military Training

15. There are 3 categories of people at risk in training:

- a. The military personnel undergoing training and those conducting it.
- b. Controlled personnel including civilian staff and contractors employed in support of training.
- c. The General Public. This includes those unaware of the military training activity and in the worst case, the trespasser, who deliberately disregards warnings or is unable to interpret warning signs be it through age or lack of knowledge or indeed any other factor.

16. **It is not within a commander's delegated authority to deviate from Statute, Approved Codes of Practice (ACOP), DCOP, Service Instructions, Policy, Regulations and Directives.** The first step therefore, when carrying out a risk assessment in training, is to establish whether or not all elements of the SST are in place. If all elements of the SST are in place the consequent hazards and controls should be recorded on the Risk Assessment and there is no need to proceed further.

Risk Assessment

17. Within Defence, there are 2 formats utilised for risk assessment. As defined in JSP 375 Part 2, Vol 1, Chap 8, risk assessment is a subjective, but logical process which can be broken down into 5 steps:

Step 1. Identify the hazards.

Step 2. Decide who might be harmed and how.

Step 3. Evaluate the risks and identify suitable and sufficient control measures.

Step 4. Record your findings and implement them.

Step 5. Review your assessment and update if necessary.

A practical aide memoire focussing on this 5 step risk assessment process is available from CESO(A) – [“Managing a Safe System of Training Commander's Pocket Guide”](#). For those conducting risk assessments in ‘Military Training for Land Systems’, the 11 step process should be followed from JSP 375, Part 2, Vol 1 Chap 40. This Chapter concentrates on the 11 step risk assessment process.

18. The aim of risk assessment in training is to:

- a. Establish that where any of the elements of the SST are not in place, the hazards that arise are recognised along with the corresponding residual risk that they pose.
- b. Analyse the residual risk to decide if the residual risk is:
 - (1) Adequately controlled. Where the risks are deemed by the commander in charge of the training activity to be ALARP, the activity can be carried out.

(2) Not adequately controlled. Where the risks are deemed unacceptable by the commander in charge of the activity, further measures are to be introduced to reduce the risk to ALARP before the activity can be carried out.

19. Where residual risks cannot be adequately controlled the activity is not to proceed unless authority is granted following consideration of the risk by the Duty Holder at the appropriate level.

20. A risk assessment, as set out in Annex A must be carried out when:

- a. Risk assessments for activities at a specific site are not provided.
- b. Instructions for the activity proposed are not covered by, or are contrary to, drills and instructions issued by the appropriate Service authority.

21. **Proposed Changes to Training Exercises.** It is essential that the effects of any proposed changes to training exercises be subjected to full written risk assessment. The Health and Safety Executive have pointed out that many military training accidents are the result of last minute changes to exercises where the consequences of such changes have not been fully thought through.

22. If the commander in charge of the training activity wishes to deviate from any ACOP Service Instructions, DCOP, Policy, Regulations and Directive, and the activity is deemed necessary to maintain operational effectiveness, the commander should obtain ODH approval for the activity to continue.

Risk Assessment Process

23. Further details on the Risk Assessment process for military training is set out in JSP 375 Part 2, Vol 1, Chap 40. The methodology for carrying out Generic Risk Assessments (GRA) in military training is the same as the risk assessment process set out in Annex A and the proforma at Annex B should be used to record the GRA. Examples of GRAs are given at Annexes C and D.

Generic Risk Assessment

24. GRAs are employed where similar activities are undertaken or repeated. These assessments describe the hazards involved and direct a standard set of control measures that are to be employed to reduce the associated risks. Repetitive training activities carried out in training units in particular, lend themselves to GRA.

25. Given infinitely variable factors present in military activities, for example the location of training, the weather or the state of training of personnel, GRAs will require careful scrutiny to ensure that they are applicable to the particular activity at that specific time and location.

26. Where the officer or person carrying out the training risk assessment, for whatever reason, considers that there are still hazards remaining which require additional control measures, he should list them and their corresponding control measures, on the risk assessment form.

Exercise Instructions

27. Exercise instructions are to state who is authorised to make changes to the exercise. They are also to contain a copy of the Exercise Risk Assessment. Such a risk assessment should consider, as a minimum, the following factors:

- a. Personnel: Military, civilian staff and the general public.

- b. Equipment.
- c. Material - food, water, fuel, etc.
- d. Procedures and associated DCOP, Service publications, drills, practices and instructions.
- e. The environment - the most important factors are likely to be climate, weather and terrain, but also hazards and controls in any site specific Training Area Standing Orders.

28. If all the elements of the SST are in place, the Exercise Risk Assessment should list the hazards and controls in place. If parts of the SST are missing, or do not cover the activity, then the additional hazards and their corresponding controls, must be added to the risk assessment in the standard format for SST risk assessments as at Annex A to this Chapter.

29. The Exercise Instructions must contain an Exercise Action Safety Plan (EASP) either as part of the coordinating instructions or as a separate Annex giving the details of the controls to be put in place and their execution.

THE RISK ASSESSMENT PROCESS FOR MILITARY TRAINING

Production and Authorisation of Risk Assessments

1. **Assessor.** The individual appointed to produce the risk assessment will be a competent person who has been appointed by the Chain of Command. The appointed competent person will be qualified, current, experienced and mature in the activity that they have been appointed to assess.
2. **Authorising Officer.** Risk assessments may only be carried out by an appointed person, as directed by the commander, who remains within the Chain of Command and is qualified, current, experienced and mature.
3. **The Process.** The steps to be taken in carrying out a military training risk assessment are:
 - a. Step 1. Describe the activity - the subject of the risk assessment.
 - b. Step 2. Identify the hazards associated with the activity.
 - c. Step 3. Identify the Risk by assessing the probability of the hazard being realised¹.
 - d. Step 4. Identify any existing controls to be implemented to reduce the risk.
 - e. Step 5. Identify any residual risks taking into account existing controls.
 - f. Step 6. Identify the need for any further controls.
 - g. Step 7. Identify any residual risks taking into account the further controls.
 - h. Step 8. Where any residual risk is greater than Low (once further controls have been implemented) and there are no further controls available, inform the Chain of Command and ask for further direction.
 - i. Step 9. The Chain of Command should review the task and amend the direction given to reduce the risk where possible or, where it remains essential (i.e there is a military imperative), elevate the risk via the chain of command.
 - j. Step 10. Communicate and implement the controls.
 - k. Step 11. Review the risk assessment.
4. The risk assessment process is set out in detail below. GRAs for military training activities are also carried out using the process set out below.

¹ While the hazard may well result in a fatal or severe accident, the risk of this occurring may well be Low with the appropriate controls in place. It is essential only Competent persons are tasked to complete a risk assessment as the determination of risk for matters not covered by the SST will have to be subjective relying on the knowledge, skill and experience of the assessor in addition to any relevant qualification.

Step 1

5. **Describe the activity - The subject of the Risk Assessment.** The activity may consist of one single training practice such as top roping and abseiling, combat driver training or a complex series of events during a course, Regimental Duties or a Joint Service exercise. It is important that the whole scope of the exercise is taken into account. Describe the activity in column 'b' of the risk assessment proforma at Appendix 2.

Step 2

6. **Identify the hazards associated with the activity.** Identify whether or not all the elements of the SST are in place. If they are, record the relevant information in the form of a Range Action Safety Plan or Exercise Action Safety Plan as part of the exercise coordinating instructions or an Annex to the instructions and there is no need for further risk assessment.

7. If they are not all in place, identify if there are any hazards not covered by the SST. Six factors should be considered in the identification of hazards:

- a. People - military, controlled personnel and the general public.
- b. Equipment.
- c. Material – ammunition, food, water, fuel, etc.
- d. Procedures.
- e. The environment - the most important factors are likely to be climate, weather and terrain.
- f. Relevant Service publications, drills, practices and instructions.

8. List the hazards in column 'c' of the risk assessment proforma at Appendix 2.

Step 3

9. **Assess the level of risk.** Record the assessed level of risk in column 'd' of the risk assessment proforma.

Step 4

10. **Identify any existing controls.** Existing controls are in the main to be found in the close observance of drills and instructions laid down by the Service authorities, by Range Standing Orders, by site specific risk assessments, or in GRAs. Existing controls should be listed in column 'e' of the risk assessment proforma.

Step 5

11. **Identify any residual risks taking into account existing controls.** Taking into account the hazards identified and the existing controls, decide whether there is any residual risk remaining and whether that risk is 'Acceptable' (the risks are adequately controlled) or 'Not Acceptable' (the risks are not adequately controlled).

12. Answer the question 'Is the residual risk acceptable?' Enter Yes or No in column 'f' of the risk assessment proforma.

13. If the answer is No, proceed to Step 6. If the answer is Yes, proceed to next Serial.

14. The risk assessment should be signed and dated by the Exercise Director who has directed the activity to take place.

Step 6

15. **Identify the need for any further controls.** Hazards categorised as having residual risks (Not Acceptable) will need further control measures applied. The additional control measures required should be listed in column 'g' of the risk assessment proforma.

Step 7

16. **Identify any residual risks taking into account the further controls.** Taking into account the controls identified at Step 6, decide whether there is any residual risk remaining and whether that risk is Acceptable (the risks are adequately controlled) or Not Acceptable (the risks are not adequately controlled).

17. Answer the question 'Is the residual risk following the application of the additional controls acceptable?' Enter Yes or No in column 'h' of the risk assessment proforma.

18. If the answer is Yes, proceed to Steps 10 and 11. If the answer is No, go through Steps 8 and 9 and the activity must not continue unless Duty Holder approval is granted to enable potentially dangerous training outside the limitations imposed by the SST to take place.

Step 8

19. **Residual risk.** The residual risk which remains after all possible controls have been put in place must be considered by the Duty Holder and a decision made to direct the activity to continue or the training requirement adjusted to ensure the risk is ALARP.

Step 9

20. **Risk decision.** The decision together with any further controls should be recorded in column 'h' of the risk assessment proforma.

Step 10

21. **Communicate and implement the controls.** Risk controls are implemented to manage the risk in order to reduce its likelihood and severity. These should include both existing controls and any additional measures identified by the risk assessment. It is essential that specific instructions are issued regarding the hazards and the control measures to be implemented by those conducting the training and communicated to those affected by the training.

Step 11

22. **Review the Risk Assessment.** Reviews should be carried out:

- a. If there is reason to suspect that the risk assessment is no longer valid.
- b. If there are significant changes to the activity.
- c. Annually.
- d. Immediately following any accident, incident or near miss.

**SAFETY IN MILITARY TRAINING, ON EXERCISES AND OPERATIONS
MILITARY TRAINING RISK ASSESSMENT PROFORMA**

Unit/Formation:
Activity/Exercise:
Relevant Publications/Pamphlets/Procedures:
Steps relate to Risk Assessment Process

Assessor:
Date Assessment:
Review Date:
Generic Risk Assessment:
Yes/No

Ser	Activity / Element (Step 1)	Hazards Identified (Step 2)	Risks Identified (Step 3)	Existing Control (Step 4)	Is Residual Risk Acceptable (Step 5)	Additional Controls Required (Step 6)	Is Residual Risk Acceptable (Step 7)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)

Authorising Officer	Name	Post	Date	Signature
Existing and Additional Controls Agreed				
Additional Controls Implemented				

**Annex C to
Chapter 3 to
ACSO 3216**

GENERIC VEHICLE RISK ASSESSMENT PROFORMA

Unit/Formation: 1 Blankshire Regiment
 Activity/Exercise: Generic Vehicle Risk Assessment
 Relevant Publications/Pamphlets/Procedures: JSP 800 Vol 5 Edition 4.1,375 & Unit SOPs.
 Steps relate to Risk Assessment Process

Assessor: WO2 Jones
 Date Assessment: 12 Sep 14
 Review Date: 12 Sep 15
 Generic Risk Assessment: Yes
 Yes/No

Ser	Activity (Step 1)	Hazards ¹ Identified (Step 2)	Risks ² Identified (Step 3)	Existing Controls ³ (Step 4)	Residual Risk (Step 5)	Additional Controls Required (Step 6)	Residual Risk (Step 7)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1.	Generic vehicle use.	1. Non-Taskworthy vehicles carrying out details due to: Incorrect or unsatisfactory vehicle servicing and inadequate Before/Halt and After Use checks being carried out. 2. Traffic Accidents caused by The Driver or 3 rd party motorist. 3. Poorly Maintained Roads and Highways ie pot holes,	Med	1. All fleet vehicles are subject to programmed vehicle servicing and repairs. 2. All drivers are required to conduct before, halt and after use drivers' checks by completing a step by step check sheet. 3. All drivers have undertaken hazard perception training to highlight the issues that may occur on the open road.	No		

¹ Something with the Potential to cause harm.

² Likelihood that harm will occur and its consequences.

³ An item, procedure or system introduced to eliminate or reduce risk.

		uneven road surface debris from road surface degradation or other road users.		<p>4. Seat belts are mandatory in military vehicles and have to be worn at all times.</p> <p>5. All loose items likely to cause injury are to be properly secured in the Cab or in the rear of the vehicle.</p> <p>6. No Pets or Smoking (or other potential distraction) is permitted within a military vehicle.</p>			
2.	Lone driving	1. Self-Drivers (who are classed as Lone Workers) may suffer fatigue or need medical assistance due to a sudden injury or illness.	Med	<p>1. All journeys need prior authorisation by LM who justifies need, reason and staff member's fitness to travel.</p> <p>2. Consideration given to journey length, duty needs at destination point and return journey making due allowance of Driver's (Duty) hours. Consider possible need to stop overnight or 'actions on' if delayed either on route or at destination.</p>	No		
3.	Vehicle Manoeuvring	<p>1. Crush injuries arising from being trapped between vehicle and other structures within hangar or parking areas.</p> <p>2. Injuries arising from vehicle manoeuvring during poor visibility and bad weather conditions.</p>	Med	<p>1. All vehicle manoeuvring is to be conducted with the aid of a competent guide.</p> <p>2. When manoeuvring vehicles all drivers are to have hazard warning lights on and are to sound horn before entering or exiting any garage.</p> <p>3. All drivers have undergone formal training, and are familiarised with the vehicle they are using.</p> <p>4. Drivers are to ensure they use the vehicle lights during poor visibility.</p>	No		
4.	Vehicle operation in inclement weather / conditions	<p>1. Fog.</p> <p>2. Dust.</p> <p>3. Snow and Ice.</p>	Med	<p>1. Review necessity for detail.</p> <p>2. Enforce procedural changes for extended braking distances.</p>	No		

		4. Heat. 5. Cold.		3. Instigate a Snow and Ice plan during periods of inclement weather. (Guard to monitor). 4. Provide skid pan training to drivers. 5. Provide survival equipment in case of breakdown.			
6.	Vehicle access and egress to workshop / hanger.	1. Danger of collision.	Med	1. Speed is to be kept at a minimum whilst manoeuvring vehicles in the Workplace. 2. Hazard warning lights are to be used whilst manoeuvring all vehicles. 3. Horns are to be sounded on entry and exit of buildings. 4. When manoeuvring, all Vehicles have to be guided by a commander / ground guide.	No		
7.	Driving on Tarmac/tracks	1. Tarmac tracks allow vehicles to drive faster across the training area – enhanced risk of skid / loss of control.	Med	1. Enforce Maximum speed limits on roads and tracks. 2. Vehicle commanders are to order speed limits for the prevailing conditions.	No		
13.	Driving on natural features and worn tracks	1. Risk from vehicles failing to negotiate natural features and worn tracks, leading to skidding / rollover.	Med	1. Vehicle commanders are to brief drivers on the possible outcomes of failing to negotiate natural features and be observant at all times whilst the vehicle is being operated. 2. During training or instructional exercises the instructor is to drive or walk the route(s) to ensure that there are no hidden hazards.	Yes	1. Ensure that drivers and vehicle commanders are trained and competent to identify potential hazards and have the skill levels needed to negotiate obstacles safely. 2. Ensure that ground and weather conditions are considered when planning training or instructional exercises.	No
14.	Cross-country driving	1. Risk of injury to drivers, commanders and passengers of vehicles from	Med	1. Maximum vehicle speed limit of 30 mph applies on all training areas. However, commanders are to assess	Yes		No

		<p>impacts with vehicle structure / fixtures as vehicle negotiates rough, uneven ground.</p> <p>2. Risk vehicle may rollover while negotiating severe gradients or difficult terrain.</p>		<p>the ground conditions, the obstacles to be negotiated, the type and performance of the vehicle being used and the experience of the driver(s) and reduce speeds accordingly.</p> <p>2. Seat belts, where fitted to the vehicle, are to be worn to minimise the potential of serious injury.</p> <p>3. For military vehicles combat helmets, or equivalent head gear is to be worn, to minimise potential head injuries.</p> <p>4. Cross-country training is to be undertaken by a suitably qualified Defence Driving Instructor (DDI).</p> <p>5. Train drivers via the GS Vehicle Familiarisation Package to address the risks of X-Country driving.</p> <p>6. Ensure a first aid kit is available.</p> <p>7. Provide a means of summoning assistance in the event of an accident, via the use of a radio or mobile telephone.</p> <p>8. Only vehicles with a designed cross-country capability are to be used for the activity.</p> <p>9. During the hours of darkness and in poor visibility (dust etc.), special care is to be taken to ensure that vehicles maintain an appropriate separation and speed.</p> <p>10. Vehicles loaded with hazardous cargo (eg: packed fuel, ammunition etc.) are not to be used for driver training. Non-hazardous cargo may be carried providing the vehicle is not overloaded and the load is properly</p>		<p>4. Drivers are to be familiarised with the obstacles prior to undertaking testing.</p> <p>5. Cross country driver testing is to be undertaken on a 1:1 student-assessor ratio; the assessor being seated in the cab. No passengers are to be carried in the vehicle for the duration of testing unless it is fitted with a crew cab/seats and rear passenger doors.</p>	
--	--	---	--	---	--	--	--

				<p>and effectively secured.</p> <p>11. Before moving onto the training area commanders are to personally check the security of any load carried and the security of the fuel filler cap to reduce the risk of contamination and/or fire in the event of a roll-over.</p> <p>12. Operate such that there are a minimum of two vehicles present so that assistance is available in the event of an accident.</p> <p>13. When negotiating an obstacle ensure that vehicles do not proceed until the proceeding vehicle is clear of the obstacle.</p> <p>14. Before leaving the training area the instructor is to complete post cross country checks prior to returning to the public road, to ensure that the vehicle is roadworthy and lights, brakes etc. are effective.</p> <p>15. Comply with training area Standing Orders, prior to any form of training commencing.</p>		<p>15. All units to contact training area control and briefed on usage and obstacles not to be used by specific vehicles. Units are to ensure this briefing is passed to all users.</p>	
--	--	--	--	--	--	---	--

**SAFETY IN MILITARY TRAINING, ON EXERCISES AND OPERATIONS
MILITARY TRAINING RISK ASSESSMENT PROFORMA**

Unit/Formation:	1 Blankshire Regiment	Assessor:	WO2 Jones
Activity/Exercise:	Summer Mountaineering - Trekking in Nepal	Date of Assessment:	12 Sep 14
Relevant Publications/Pamphlets/Procedures:	JSP 375, 419, AGAI 11 & 18 & Unit SOPs.	Review Date:	12 Sep 15
Steps relate to Risk Assessment Process		Generic Risk Assessment: Yes/No	Yes

Ser	Activity (Step 1)	Hazards ¹ Identified (Step 2)	Risks ² Identified (Step 3)	Existing Controls ³ (Step 4)	Is Residual Risk Acceptable (Step 5)	Additional Controls Required (Step 6)	Is Residual Risk Acceptable (Step 7)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
1.	Driving - UK	1. RTA	Low	1. Compliance with JSP 800. 2. Driving will only take place in the UK. 3. Logistical company will arrange transport in Nepal.	Yes		
2.	Driving – Nepal	1. RTA	Med	1. Travel only in private vehicles hired and driven by logistical company. 2. Avoid public transport. 3. Avoid travelling at night. 4. Only proven Competent drivers employed.	Yes		
3.	Political instability	1. Riots 2. Civil unrest 3. kidnap/abduction	Low	1. Exped authorised by FCO. 2. All members receive brief from FCO. 3. remain current with political situation. 4. Always remain in groups of 3 in built up areas.	No	1. Remain in contact with FCO. 2. Take advice from logistical support company and local guides.	Yes/Low
4.	Theft	1. Loss of exped equipment. 2. Loss of personal equipment.	Med	1. Equipment always secured. 2. Equipment never left unattended. 3. 2 pax minimum stay with equipment. 4. Group equipment insurance.	Yes		

¹ Something with the Potential to cause harm.

² Likelihood that harm will occur and its consequences.

³ An item, procedure or system introduced to eliminate or reduce risk.

		3. Loss of cash.		5. Personal insurance.			
5.	River Crossing	1. Drowning 2. Entrapment 3. Head Injuries	High	1. The crossing of water that is deeper than 'wade-able water' will not be undertaken. 2. Current speed always confirmed before entry. 3. Local knowledge always consulted first.	Yes		
6.	Environmental Health	1. Food poisoning and subsequent illness.	Med	1. Those cooking on the trek are to observe the highest hygiene. 2. Those feeling poorly are not to cook. 3. Thorough cleaning of all cooking and feeding equipment. 4. Bottled, filtered or boiled water only.	No	1. Maintain hygiene checks. 2. Early intervention.	Yes/Low
7.	Infectious Diseases	1. Malaria. 2. Rabies.	Med	1. Relevant inoculations pre-departure. 2. Advice from EHT at Sp Comd. 3. HRR Assessment.	Yes		
8.	Accidents and incidents in built up areas	1. Accidents/injuries. 2. Re-occurring medical issues.	Med	1. All MFD prior to departure from UK. 2. A stock of repeat prescriptions to be carried. 3. Exped insurance required. 4. Contact with FCO. 5. All participants to be 1 st Aid Trained. 6. Carry 1 st Aid equipment.	Yes		
9.	Accidents and incidents whilst trekking	1. Accidents/injuries. 2. Re-occurring medical issues.	Med	1. All participants to be 1 st Aid trained. 2. Exped insurance with emergency evacuation cover to be purchased. 3. Prearrange comms through logistical company. 4. Have JCCC details. 5. All participants know the evac procedure. 6. Inform FCO ASAP. 7. Satellite phone to be carried. 8. Carry 1 st Aid equipment.	No	1. Comms may fail dependent on location and signal strength. Establish emergency comms failure cut-off plan.	Yes/Low.
10.	Environmental Dangers	1. Monsoon rains. 2. Flooding. 3. Landslides. 4. Avalanches.	Low	1. Take advice on dates from FCO. 2. Take advice from logistical company. 3. Avoid monsoon season. 4. Effective route planning.	Yes		
11.	Trekking -Altitude Sickness	1. AMS. 2. HAPE. 3. HACE.	High	1. Adhere to DIN on altitude. 2. Appropriate acclimatisation plan. 3. Climb high, sleep low. Fluid intake. 4. Altitude medication to be carried. 5. All participants briefed on altitude sickness prior to departure and in theatre. 6. Use Lake Louise scorecard. 7. Buddy buddy system.	No	1. Maintain acclimatisation plan Maintain accompanied descent capability at all times.	Yes/Low
12.	Trekking -Climatic Issues	1. Hypothermia. 2. Hyperthermia. 3. Sunburn.	Med	1. Compliance with JSP 539. 2. Educate all participants. 3. Appropriate clothing.	No	1. Observe weather patterns. 2. Observe work rate during activities.	Yes/Low

		4. Non freezing cold injuries.		4. Appropriate PPE (glasses, sun cream). 5. Hydration. 6. The ability to recognise the signs and symptoms. 7. Buddy buddy system.		3. Introduce regular physical checks as likelihood of occurrence rises. 4. Introduce 5. Maintain accompanied descent capability at all times. 6. Ensure early treatment intervention	
13.	Trekking – Exposure to height	1. Panic attacks	Low	1. Instructors to beware of the emotional response that can occur amongst those individuals exposed to height activities.	No	1. Always remain vigilant and be aware of the appropriate coping strategies.	Yes/Low
14.	Trekking – Environmental impact	1. Overcrowding.	Low	1. Communicate where required with other group leaders. 2. Confirm & de-conflict routes. 3. Share best practice.	No	1. Always remain vigilant of other users. 2. Active de-confliction action.	Yes/Low
15.	Trekking – Student competency	1. Student incompetence	Low	1. All participants to achieve SMF prior to departure from UK. 2. Close supervision. 3. Mutual / peer support.	Yes		
16.	Trekking	1. Group separation	Low	1. All participants to be closely supervised at all time. 2. Separation is prohibited at all times (less real life emergencies).	Yes		
17.	Steep ground	1. Falls from height	Med	1. Identification of potential fall sites (holes, drops, edges and similar). Continuous observation and briefing.	Yes		
18.	Trekking	1. Benighted.	Low	1. All personnel carry issued and serviceable head torches. 2. Head torches are checked prior to issue. 3. Everyone to carry replacement batteries and cylumes.	Yes		
19.	Trekking – Wild camping	1. Attack from wild animals.	Low	1. Be aware that wild animals do exist in Nepal. 2. Beware and avoid wild dogs. 3. Seek advice from FCO.	Yes		
20.	Trekking	1. Muscular and skeletal injuries	Med	1. All participants are to be mountain 1 st Aid trained and in date. 2. All participants are to be conversant with the evacuation plan. 3. Instructors are to carry a suitable 1 st Aid kit and satellite mobile phone.	Yes		
21.	Trekking	1. Metrological influences.	Med	1. Observe weather forecast and adjust travel where appropriate. 2. Obtain weather reports using logistical company.	No	1. Forecasting remains a priority. 2. Continuous observation and recording. 3. Early intervention	Yes/Low
22.	Fire	1. Cooking.	Med	1. No smoking in tents. 2. Cooking will be centrally focused. 3. No cooking in sleeping tents.	Yes		

Authorising Officer	Name	Post	Date	Signature
Existing and Additional Controls Agreed	J Smith	2IC Blankshire Regiment	12 Sep 14	<i>Original has to be Signed</i>

Additional Controls Implemented	J Smith	2IC Blankshire Regiment	12 Sep 15	<i>Original has to be Signed</i>
--	---------	-------------------------	-----------	----------------------------------

CHAPTER 4

ARMY DUTY HOLDING

1. A policy framework for Duty Holding (DH) in the Army Land environment; Army aviation adheres to Air DH arrangements.

The Army Duty Holding Model

2. Following Haddon-Cave and the creation of the Military Aviation Authority, the then PUS Jon Thomson directed that the air-facing DH model be applied to all military environments. In 2013 the Army Command Group directed that the DH model be aligned to the Chain of Command, with CGS as the Senior Duty Holder (SDH), 2* commanders as Operating Duty Holders (ODH) and Commanding Officers as Delivery Duty Holders (DDH).¹

3. This model has offered several advantages:

- It has raised the profile of Safety and Duty of Care (DoC) across the TLB.
- The alignment of the DDH role with Commanding Officers has generated a sense of purpose and ownership of safety risk management.
- Commanding Officers are best placed to fully understand the risks their personnel are exposed to.

4. That said, the model has offered some challenges:

- The application of DDH has been applied broadly, noting that the Land environment differs to the Air and Maritime environments.
- At the Commanding Officer level, DDHs arguably lack many of the levers necessary to mitigate genuine Risk to Life (RtL), but do command the personnel².
- Frictions exist at TLB boundaries.

Duty Holding in the Defence Context

5. The Defence Safety Committee endorsed DG DSA's Duty Holding Policy Paper in Jun 17. The paper explains why and how DH should be applied across Defence. It outlines ten DH Principles:

1. DH relates to military activities which present a justified, credible and reasonably foreseeable RtL and where DoC is inadequate for owning, assuring or escalating the risk.
2. Duty Holders should be appointed at 3 levels: SDH, ODH and DDH.

¹ ACG/M(13)13, dated 22 Nov 13; and ACG/M(13)14, dated 6 Dec 13.

² Ownership and direction of the personnel conducting the activity was a key DH requirement as articulated by Haddon-Cave.

3. Duty Holders should be competent and adequately prepared for DH, by means of formal training.
4. DH is not rank related and a Duty Holder should have direct access to a superior Duty Holder.
5. Duty Holders should be empowered through letters of appointment.
6. Duty Holder Responsibility, Authority and Accountability (RA2) are to be aligned, to ensure RtL is mitigated to As Low As Reasonably Practicable (ALARP). Where this is not possible for Organizational reasons, the SDH must ensure that Duty Holders have the necessary influence to allow the mitigation of the RtL.
7. Duty Holders must have the authority to pause or cease activities within an operating envelope where an operating risk is no longer tolerable and ALARP.
8. Where a Duty Holder is unable to mitigate a RtL to both tolerable and ALARP, a mechanism should exist for the risk to be escalated up the Duty Holder chain.
9. Duty Holders always retain their responsibilities for deployed Force Elements (FEs). These FEs are owed a DoC by the Operational Commander.
10. Organizations that support Duty Holders by providing platforms, equipment (DE&S) and infrastructure (DIO) that are designed, manufactured and maintained to be safe to operate are recognised as Duty Holder-facing.

Duty of Care

6. Irrespective of DH, Commanding Officers have both a moral and legal obligation to ensure the safety or well-being of others, otherwise known as Duty of Care (DoC). This obligation to provide a 'safe system of work' covers the substantial majority of activities that a unit will face.

Safety Culture

7. To underpin the Army's approach to both DOC and DH, it is vital that a robust Safety Culture is developed and fostered. A healthy, active Safety Culture will ensure that the Army's awareness, reporting and management of safety risk will continue to develop. The Army's Culture for Safety strategy is at Chapter 2 of ACSO 3216.

Risk

8. The Health and Safety Executive (HSE) recognises the importance of realistic training in ensuring the Army is prepared effectively to conduct military operations. It accepts that there will

always be the risk of injury or death when conducting military training, but expects those risks to be identified and properly managed (reduced to ALARP)³.

9. ALARP is a subjective concept which requires careful consideration of the value of potential gain balanced against the risk and the cost of practicable mitigation. Gains may be measured in terms of ability to generate capability or to recruit and retain personnel, whereas costs may be calculated in terms of time, money and trouble (effort put into supervision and risk mitigation).

10. It is appropriate that the ALARP cursor is set at different levels through the training progression, with very low tolerance of risk early in the cycle or when inexperienced troops are employed (when the gains are not worth the potential risks), but increasing as experience and confidence grow and training becomes more demanding and realistic in preparation for the realities of operations (training as we fight).

The Army's Risk to Life Activities

11. The previous Army DH model identified 136 High Risk activities. These have been recognised by respective Army Competent Advisors and Inspectorates (ACAs). High Risk activities cover RtL, risk to Reputation and/or risk to Capability. This number of activities has required a disproportionate degree of management effort by Duty Holders in the Land environment when the DSA principles are applied. It has also led to a limiting ability for DH to be meaningful and effective as a safety risk management tool.

12. Narrowing the Army's defined RtL activities will ensure focus is applied to the activities presenting the greatest risk. Furthermore, it will enable an achievable annual report by ODHs to the SDH on how safety is managed for the most hazardous activities.

13. The amended list of RtL activities are:

Ser	Activity
(a)	(b)
1	All training involving all types of live firing.
2	Arduous training.
3	Adventurous Training (aka Leadership and Resilience Training).
4	Military Diving.
5	Operating / driving military bespoke vehicles.
6	Aviation (including UAVs) – in accordance with Air DH arrangements.
7	Military parachuting (including Display Teams).
8	EOD (and similar) activity, including Ammunition and Demolitions.

14. **Sport.** Whilst DH will not apply to sport as National Governing Bodies (NGBs) set the safety standards required for their sport, it remains a chain of command responsibility to adhere to their legal DoC obligations when their soldiers participate in sport. In certain circumstances, the Army may wish to impose stricter standards in some areas, such as mandating the ability to swim prior to conducting sailing.

³ RtL can be said to be reduced to a level that is ALARP when the cost of further risk reduction (mitigation) is 'grossly disproportionate' to the benefits of risk reduction. It is a balance of gain versus the cost (in time, effort and financial terms). The balance must always be weighted in the favour of safety with greater consideration and proof required for RtL close to the intolerable boundary.

15. **Adventurous Training.** Comd ATG(A) sees value in retaining DH in the Army as a tool for enhanced safety management of Adventurous (Leadership and Resilience) Training. A bespoke model is required, the policy for which will be jointly owned by CESO(A) and ATG(A).

Governance

16. **CGS (as SDH).**

- a. Direct that the Army has an effective process for managing RtL and that the activities to which DH is to be applied are duly endorsed.
- b. Elevate any safety related risk to Secretary of State that cannot be made ALARP and tolerable within Army TLB means.
- c. Direct that all subordinate Duty Holders receive appropriate training⁴ and have sufficient resources to deliver their role and responsibilities.
- d. Formally appoints ODH through a letter of delegation.

17. **CFA, CHC, DCGS.**

- a. Understand RtL activities across their HLBs.
- b. Ensure adequate resources to facilitate risk management at ODH level.
- c. Sponsor intractable risks elevated by ODH to the SDH.
- d. CFA - Hold pan-Army (Command) risks and dispensations where appropriate. The risk referral and dispensation process is detailed at Chapter 5.

18. **2* Level:** GOC 1 (UK) Div, GOC 3 (UK) Div, Comd JHC, GOC FTC, GOC LONDIST, GOC RC, Dir LW, COS FA (for 16X), D Cap (as 2* commander of the TDUs), GOC ARITC, (as **ODH**).

- a. Ensure that safety related risk is managed to at least tolerable and ALARP and, where this is unachievable, escalated for resolution by the chain of command or SDH.
- b. Supported by appropriate Heads of Capability (HoC), ensure activity and equipment are not operated outside of the safety case without suitable and sufficient risk assessment, controls and mitigation, subject to operational circumstances.
- c. Formally appoint DDHs in their AoR through a letter of authority; an example is at Annex A to this Chapter.
- d. Understand RtL activities within their command.
- e. Within each RtL activity, balance risk with resource over time.
- f. Meet DH obligations for FE for UK and overseas operations.

⁴ ODHs are to attend the 1 day DSA Generic DH Course. The course remains valid for 3 years.

- g. Ensure compliance with specific direction on DH for the endorsed RtL activities set out by the Army Safety Sub-Committee.
- h. Sponsor the case for additional resource to mitigate risk to appropriate command groups.
- i. Agree and own dispensations (where no pan-Army dispensation has been issued).
- j. Where directing RtL activities which involve personnel from other TLBs, be prepared to assure to those TLBs that risk is held ALARP.
- k. Ensure DDHs receive appropriate training and have at their disposal sufficient resources to deliver their role and responsibilities.
- l. Chair an annual Safety Board that either collectively, or individually, reviews all RtL activity in their AOR. Safety Boards must be attended by all DDHs and should include any relevant updates from DH-facing SMEs that pertain to risks in the AoR. The agenda is at the discretion of the ODH, but should include a summary of reported incidents/accidents across the AoR (including recommendations/lessons from investigations), a review of the DDH's key risks (including control measures) and a summary of output from assurance of activity.

19. **1*/OF 5 Commanders.**

- a. Understand RtL activities within the brigade/command.
- b. Mentor all DDHs' approaches to managing RtL.
- c. Oversee the assurance process by DDHs.
- d. Elevate and help prioritise DDHs' safety risks to the ODH level.
- e. Develop a culture for safety and conscience at the 1*/OF 5 command level – See Chapter 2 for safety culture details.

20. **Commanding Officers/OCs of Independent Squadrons (as DDH).**

- a. Understand RtL within the unit and ensure it is appropriately managed.
- b. Ensure activity and equipment are operated within the safe system of work/training as articulated in the safety case or relevant policy document.
- c. Stop or adjust activity where risk is not ALARP. Then conduct action to restore ALARP and then maintain tolerability.
- d. Where dispensations have been authorised by the 3* Comd or ODH, ensure all controls and mitigations are understood, applied and that regular reviews are carried out frequently and, as a minimum, every 6 months.
- e. Ensure compliance with specific direction on DH.

- f. Having engaged with the chain of command for resolution and, in extremis, elevate any safety related risk to the appointed ODH that cannot be made ALARP and tolerable within allocated resources.
- g. Where directing RtL activities which involve personnel from other TLBs, be prepared to assure to those TLBs that risk is held ALARP.
- h. Report to ODH annually on RtL activity, risk management and incidents/accidents via the ODH Safety Board.

21. **D Cap.** In addition to his role as an ODH for the TDUs is also a DH-facing SME. In this role he will:

- a. Provide advice on safe usage of equipment.
- b. Own, maintain and co-sign Part 3 of allocated Safety Cases⁵.
- c. Act as a single point of contact for capability safety advice to 3* Comds/Duty Holders.
- d. Develop and maintain an equipment safety focal point.
- e. Acknowledge, on behalf of the Army, risks that are transferred from DE&S through the risk referral process.

22. **D Info.** Responsibilities as for D Cap but pertaining to the Information AoR only.

23. **D B&I.** Responsibilities as for D Cap but pertaining to the Basing and Infrastructure AOR.

24. **CESO(A).** In addition to his safety policy role, is responsible for the management and oversight of the Army's DH policy. In doing so he will:

- a. Maintain records of the endorsed RtL activities to which DH is to be applied within the Army.
- b. Develop and deliver appropriate training to Duty Holders⁶.
- c. Inform the Chain of Command (through Command Groups) of emerging DH issues.
- d. Advise and create bespoke DH arrangements with the chain of command when the situation demands.
- e. Liaise with Defence Safety Authority (DSA) over Army DH issues.

25. **Chief Engineer (Army).**

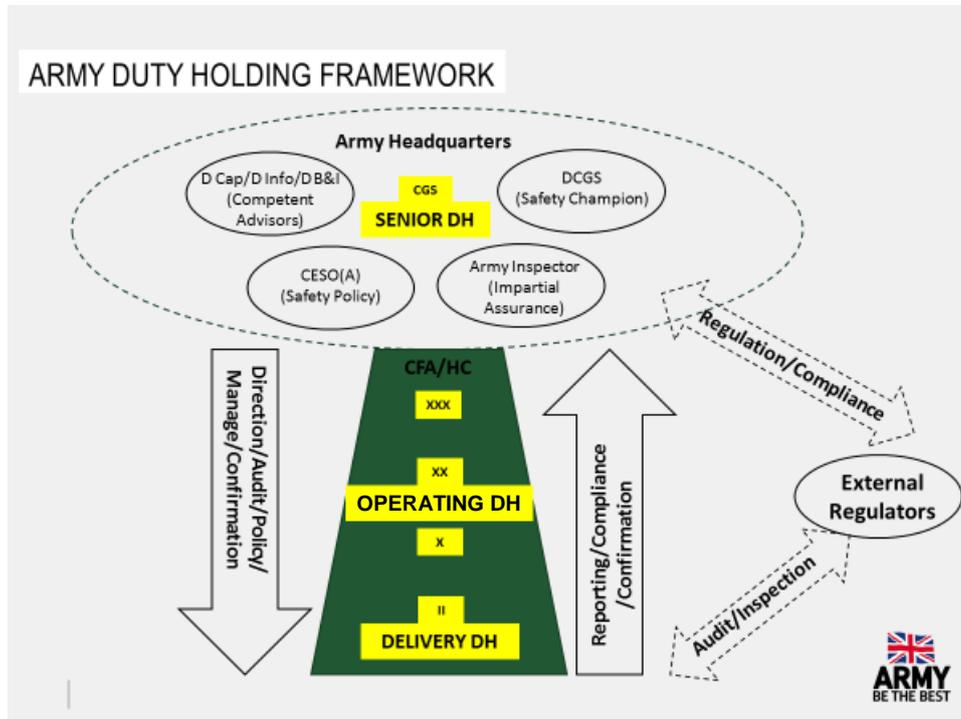
- a. Advise HoCs on the technical engineering and maintenance elements of safety cases.
- b. Act as the Army's engineering safety focal point.

⁵ Whilst D Cap has the overall ownership of the Safety Cases, maintenance and co-signing is delegated to the appropriate HoCs.

⁶ ODHs will either attend the DSA-run training package or be briefed by CESO(A) in person; DDHs will be briefed by CESO(A) on the CODC and undertake the CESO(A) DLE-hosted online DH training.

c. Chair the Land Systems Safety WG and the Army Engineering Committee.

26. A pictorial representation of the Army DH model is shown below:



Duty Holding in UK Operations

27. Whilst for UK resilience operations SJC operates direct to Government, as far as is practicable, normal DH principles will apply on such operations; it must be recognised that complex force packages involving all 3 services and other Defence and external agencies are task organised to meet the requirements of these operations. SJC(UK) will consult with CESO(A) on bespoke DH arrangements for inclusion in any Operation Order.

Duty Holding on Overseas Operations

28. When activities identified by the SDH for Duty Holders are conducted by Army TLB personnel on operations, and/or under a Joint Operational construct, the Army's force generating DH chain is responsible for preparing the deployed troops to the required standard and defining the safe operating envelope for the conduct of the activity when deployed on operations (eg compliance with Pamphlet 21). Duty Holders retain their responsibilities for deployed Force Elements who are owed a DoC by the chain of command under the Joint Operational Commander.

29. If the Joint Operational Commander wishes to exceed that operating envelope, a discussion is required with the appropriate ODH. If the ODH is not prepared to extend the operating envelope to allow the activity but the Joint Operational Commander wishes to continue, the matter should be

referred to the SDH, or if circumstances do not permit this referral, the Joint Operational Commander must accept ownership of the risk.

30. The same principle applies to operating equipment outside of the Safety Case. PJHQ must engage with the Army ODH who will engage with D Cap as capability sponsor (and where applicable D Sp as the conduit into DE&S); D Cap is best placed to understand and articulate the true nature of the risk, but the ODH will be clearly known to PJHQ. The discussions must identify what additional mitigations can be applied to reduce safety risk if there is a routine requirement to exceed the defined safe operating envelope. If D Cap (informed by D Sp and DE&S) does not agree to extend the operating envelope, PJHQ must accept ownership of the risk, with the ODH fully engaged in the process. The DH process for overseas operations is shown at Annex B.

Duty Holding for Cadets

31. The principles for DH for cadets - CCF and ACF - are the same as for Regular and Reserve personnel⁷. GOC RC is the ODH for all cadets. 1* oversight will be vested in RPoC Comds, with Contingent Commanders within the CCF and County Commandants within the ACF as DDHs. The DH-facing SME for cadet matters will be D Comd Cadets, HQ RC.

Duty Holding in Training

32. Under the previous Army DH model, friction occurred in the Collective Training space and between 2* formations⁸ who perceived parent Commanding Officers as being DDH for their personnel at all times, and Field Army Training Branch who wished to see DH status and a framework applied to the Collective Training Establishments' (CTE) chain of command when they **design, direct and deliver** combined arms training activity.

33. This revised policy allows for the transfer of DDH status for specified periods of collective training. Commanding Officers will remain DDH for their personnel with responsibility to safely generate force elements prepared in all respects when conducting special to arm and combined arms training at CTEs. However, during the phase when the CTE has designed and is directing and delivering combined arms training (ie competency earning exercise), the CTE Commander assumes DDH status and has overall responsibility for the safe conduct of the training. The precise time will be recorded and logged when DDH responsibility is transferred from exercising Commanding Officer to CTE Comd and returned, noting that this will only apply when a RtL activity requiring a DH construct is conducted. To support this process, CTEs are to establish a process to ensure that DDH-held risks are transferred at the point of DDH transition.

34. Notwithstanding this proposed policy amendment, all stakeholders must recognise and acknowledge that DoC is the primary legal and moral obligation, the responsibility and accountability for which always sits with commanders (from JNCO to General) overseeing activity, irrespective of any DH status.

⁷ HQ RC - Cadet Branch have a bespoke DH training package for Contingent Commanders and County Commandants.

⁸ 1XX, 3XX and FTC.

AN EXAMPLE LETTER OF AUTHORITY TO A DDH

GOC ***

Address

Telephone:

Fax:

CO/*/**

Recipient

Address

Date

LETTER OF AUTHORITY TO ACT AS DELIVERY DUTY HOLDER FOR UNIT

References:

A. ACSO 3216 dated Feb 18.

1. Chapter 4 of Reference A details the Duty Holding (DH) construct within the Army. DH is applied within the Army in a tiered construct that is deemed appropriate and beneficial to what we do. It applies specifically to 3 levels within the Chain of Command that direct activities recognised as posing significant Risk to Life (RtL). It provides for better management of risk and allows for elevation of risk for consideration by a superior DH when circumstances warrant this.

2. As an appointed Operating Duty Holder (ODH), I hereby appoint you as a Delivery Duty Holder (DDH) for those specified RtL activities carried out on in your Area of Responsibility (AoR), as designated in Reference A and effective from the date above. You are to:

- a. Act as DDH in accordance with this Letter of Authority from me.
- b. Understand RtL within the unit and ensure it is appropriately managed.
- c. Ensure activity and equipment are operated within the safe system of work/training as articulated in the safety case or relevant policy document.
- d. Stop or adjust activity where risk is not ALARP. Then conduct action to restore ALARP and then maintain tolerability.
- e. Where safety related risk is no longer tolerable and ALARP, engage with the CoC in order to return the risk to tolerable and ALARP; elevate any safety related risk to me that cannot be made ALARP and tolerable within allocated resources and appropriate control measures, informing the CoC as necessary.

f. Where dispensations have been authorised by the ODH / 3* Comd, ensure all controls and mitigations are understood and applied and that regular reviews are carried out as per the direction within the dispensation and, as a minimum, every 6 months.

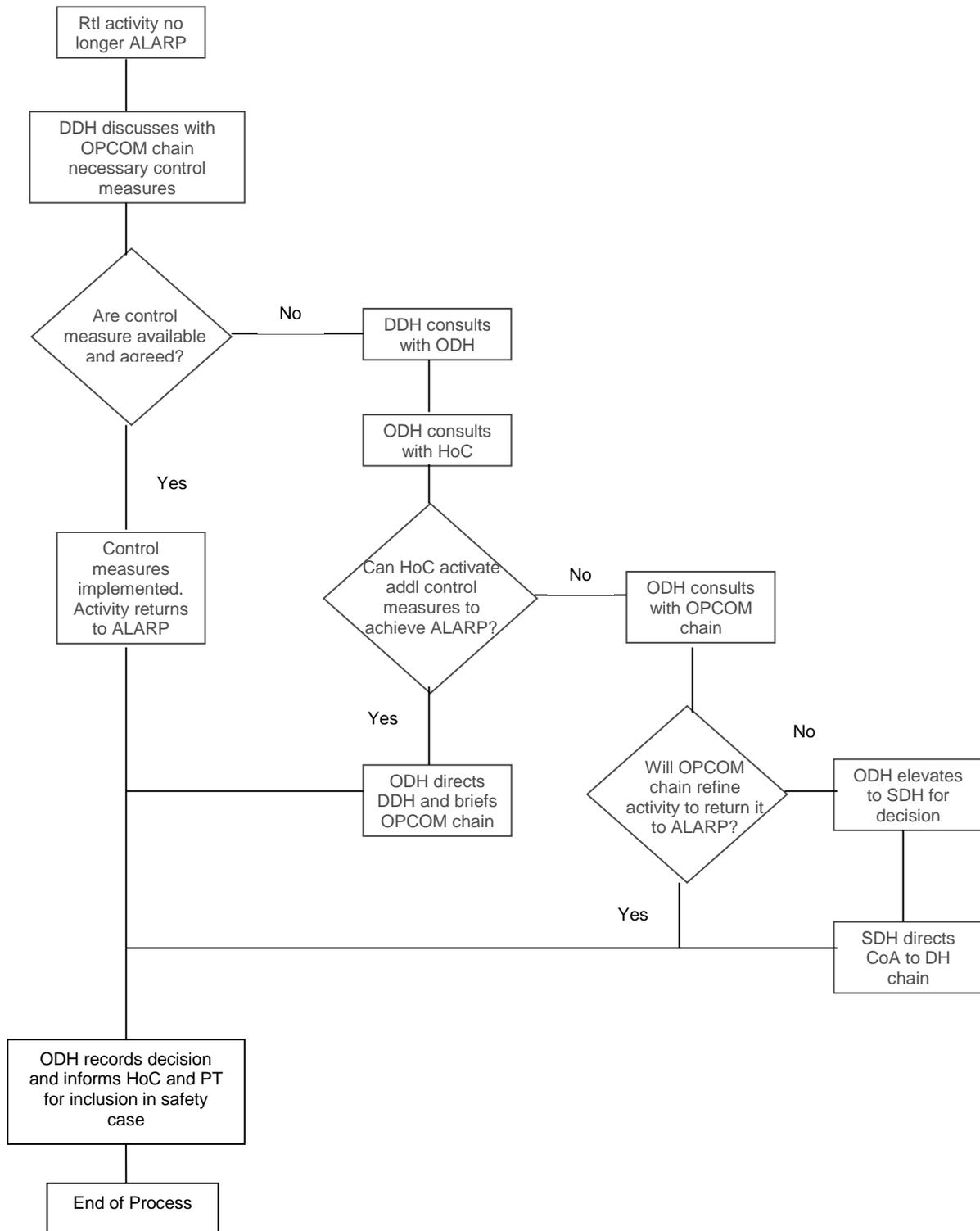
g. Undergo the designated DH training within 30 days of the receipt of this letter if not already conducted.

3. Your appointment as DDH confers right of access to me on any safety matter in your AoR that requires my attention.

4. To assist in your deliberations on any matter set out in Paragraph 2 you should ensure you are provided with competent advice initially through your own resources and subsequently, if required, through my staff.

5. You are to acknowledge receipt of this Letter of Authority and your appointment as DDH in writing within 30 days.

DH ON OVERSEAS OPERATIONS - PROCESS FLOW

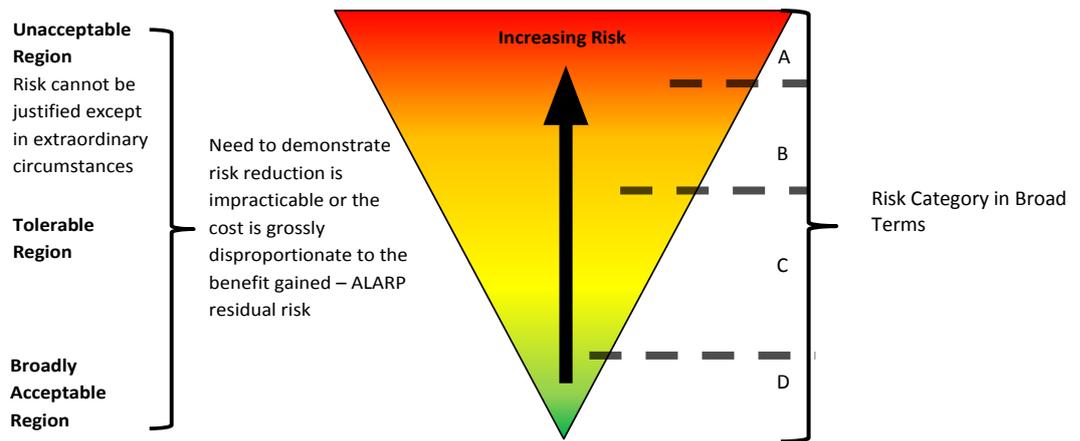


CHAPTER 5

RISK REFERRAL AND DISPENSATION PROCESS

Risk Referral

1. Military operations may exceptionally demand that personnel or environmental receptors are exposed to levels of risk that, in civilian operations, would be considered abnormal. Decisions to tolerate such risks in order to preserve or enable an essential military capability must always be made at appropriate levels of seniority. For risk that breaches legislation this authority lies at Ministerial level delegated to DG DSA, except where National Security is not an element of the exemption clause, which remain with the Minister.
2. Occasionally, a judgement call, by Army HQ, to tolerate very high levels of safety and environmental protection risks to particular groups of people such as the crew of a vehicle, or specific environmental receptors needs to be taken. This decision will be taken in order to preserve or enable an essential capability that balances the identified risks with the counter-risks to people that the capability aims to mitigate. The risk referral process provides an auditable mechanism for formally raising the risk to appropriate level.
3. The process records decisions at each stage of the referral process. These decisions may involve the release of funds or changes to operating procedures that mitigate the risk, referral of the risk to a higher-level authority or a decision to tolerate the risk due to exceptional operational circumstances. The pace of decision-making will be driven by operational urgency and the risks associated with continued operations must be balanced against the consequences of withdrawing the capability.
4. This Chapter deals with risk referral where Operational Dispensation is not appropriate or following operational risk referral where dispensation or derogation is sought for use of the equipment outside of the accepted safe envelop (as defined in the Safety Case (SC)). It describes the process for referring risks to a level at which the authority lies, to either treat, tolerate or transfer the risk.
5. DSA 02 Land System Safety and Environmental Protection and DSA03 Land System Safety and Environmental Protection Defence Codes of Practice, specify the regulations, codes of practice and supporting guidance for safety and environmental protection for Land Systems. DE&S Safety and Environmental Protection Leaflet 03/2011, provides detailed guidance to DE&S about the management of risks from equipment including their internal referral process.
6. DE&S classify risk as A, B, C or D. These classifications are used as a nominal against the bounds within the Risk Classification Matrix for those risks defined as Unacceptable (A), Tolerable if ALARP (B&C) and Broadly Acceptable (D). It is important to note that it is the willingness of the Safety Panel (a joint body with appropriate DE&S and user representation) to tolerate a given risk, not necessarily that it has been classified as an A class risk. See Figure below.



ALARP and Levels of Tolerability.

7. Risks can be identified by any stakeholder, but will usually be identified by one of the following:

- a. Where a risk has been identified on operations and dispensation sought. Risk referral may be required to establish a temporary dispensation, exemption from legislation until the equipment is modified, or a new capability is introduced. This exemption will last for the duration of that given tour. In extremis, an exemption from legislation may be required.
- b. During the annual review of the SC.
- c. During investigation following accidents or near misses where safety issues that require addressing are identified.
- d. Where legislation and policy changes due to new information pertaining to a risk from previous legal use, places existing equipment, or activity in breach of that legislation.
- e. Where medical evidence may highlight a previously unknown risk which requires mitigation.
- f. By Users, DE&S or contractor during design, use, maintenance or disposal.
- g. When equipment has been modified, upgraded or the use changed on a permanent basis.

8. The majority of risk referrals in relation to equipment will, in the first instance, be referred by the DE&S relevant PT to the Operating Centre Director. If DE&S cannot provide sufficient risk reduction through technical resources, the Operating Centre Director will refer the risk to the Capability owner, who in the Army's case is D Cap.

9. On receipt of a referred risk D Cap will direct the establishment of a Risk Referral Working Group (RRWG) to manage the specific risk. The RRWG is chaired by the relevant Capability Sponsor within the HoC. Membership of each risk specific RRWG will depend on the nature of the risk, but should include all relevant stakeholders; as a minimum, the RRWG, is likely to include:

Lead HoC Hd and SME desk officers
 DE&S PTL and Operating Centre Representative
 CE(A)
 DLoD Owners including, D Eqpt
 HQ Fd Army (+ HQ Home Comd for risks applicable to SJC (UK))
 Legal
 Med

CESO(A)
Army Inspector

10. The RRWG is responsible to D Cap for all staffing of the referred risk, which will include conducting a detailed assessment of the risk and providing recommendations to treat, tolerate, mitigate or refer the risk. The RRWG will:

- a. Inform the Chain of Command of the identified risk and any immediate action or mitigation that needs to be adopted until the risk has been further quantified and understood. Where there is a RtL, a serious risk of environmental damage, loss of capability or a risk to reputation, all operation of the equipment must cease.
- b. Conduct a detailed assessment of the risk to confirm: the risk; the potential impact of the risk; the likelihood of the risk occurring; any existing dispensations and their corresponding mitigations; an assessment of a permanent or temporary removal of the capability and the requirement to maintain the specific capability.
- c. Identify possible measures for treating or mitigating the risk. These might include:
 - (1) The identification of technical solutions that may not have already been considered by DE&S.
 - (2) Changes to operating parameters.
 - (3) Provision of PPE.
 - (4) Improved information, training or supervision.
- d. Provide recommendations on interim measures to mitigate the risk.
- e. Prepare the case for referral of the risk to a higher authority.
- f. Prepare the case for exemption from legislation for submission to the Land Exemption Committee¹ (LEC) if required.
- g. Produce guidance for future capability development.
- h. Confirm to the DE&S PT that the Army accepts the transfer of the risk. This is to be in the form of a formal letter to the DE&S PT signed by D Cap.

11. The Army Risk Referral Process is shown at Annex A to this Chapter. Once established, the RRWG assumes responsibility for staffing a risk through the risk referral process until its conclusion. The RRWG provides all necessary briefs to the appropriate responsible officer for consideration. At each level of referral there will usually be 5 choices available when considering the risk, some of which may be used in combination:

- a. **Resource Technical Mitigation.** This may involve funding to cover short term mitigations and/or DSTL/DE&S research into longer term potential mitigations. In extreme cases this may involve completely replacing the capability.
- b. **Implement Procedural Mitigations.** Implement procedural mitigations to reduce the level of risk to an acceptable level, and accept the resultant residual risk, providing dispensation where required.

¹ The LEC meets to assess requests to invoke legal exemptions from certain equipment related legislation on behalf of SofS.

- c. **Withdraw the Equipment from Service.** This may result in a capability gap that must be accepted by the Field Army.
- d. **Refer the Risk to a Higher Authority.** Refer the risks to a more senior level for further scrutiny.
- e. **Apply for Exemption from Legislation.** In cases where the outcome of the risk may present a breach of legislation and it is not practicable to mitigate the risk to a level at which is conforms to legislation, consideration should be given to whether an exemption from legislation is required¹. This exemption may be permanent or temporary, eg pending the introduction of a future capability. All exemptions from legislation are to be submitted to the LEC as detailed in the footnote reference.

12. The RRWG will need to assess whether interim dispensation is required to allow continued use of the capability until the risk referral process has concluded. Where the risk is deemed tolerable to the DH facing SME, agreement will need to be sought from HQ Fd Army in consultation with each of the relevant 2* ODH who retain the risk as owners of the people and the RtL activity. Details of the agreement must be recorded and retained by the chair of the RRWG.

13. Once agreed, users (via 2* ODH/DDH) will be instructed to operate in accordance with the agreed mitigations/control measures imposed.

14. Where a decision cannot be taken at each specific level because it falls outside the delegated level of responsibility, or direction is sought from a higher level, the risk is referred to the next level of command. Referral of such issues through the DH chain, or CoC will follow a judgment that further action to mitigate risk to a tolerable level is not reasonably practicable because the resulting loss of Defence capability, eg by withdrawal of equipment from service, delaying entry to service and reduction of operational performance, is grossly disproportionate to the benefit of removing or reducing the safety risk.

15. In cases where the capability is deployed on operations, this should be conducted through the Operational Dispensation and Risk Referral Process.

16. Within the Army TLB, the risk referral route is:

- a. 2* - D Cap.
- b. 3* - CFA/CHC/DCGS.
- c. 4* - CGS (SDH).
- d. Ministerial - Secretary of State.

17. Identification and referral of risk must be recorded throughout the process. Risks should be recorded on DCRT² and updates provided at every stage of referral to create the essential audit trail. Where decisions are taken, they must be formally recorded through Minutes/Records of Decisions from the relevant RRWG and decisions disseminated to:

- a. The equipment Safety Panel, for amendment to the SC.
- b. HQ Fd Army.
- c. 2* Chain of Command.

¹ [DSA 02 DLSR LSSR Land System Safety and Environmental Protection Directive \(Previously JSP 454 Part 1\)](#)

² D Cap Data Capture & Reporting Tool.

d. Other relevant stakeholders. The timelines for the RRWG to complete the referral process will be driven by operational urgency, the level of risk identified and the impact of suspending the capability. The RRWG should agree timelines for completion of work with D Cap at the early stages of its work. For risk referrals accepted on a time basis, as the deadline for expiry approaches, the risk must be reconsidered by the RRWG and the whole process followed from the beginning.

Dispensations

18. There are a number of areas where risk has been identified and a dispensation is required to be put in place to allow continued training or use of equipment. This is likely to be as follows:

a. **Training Dispensation.** Where training exceeds the boundaries of the operating capability as defined by the SC, or is outside of the Safe System of Training. Training dispensations remain within the direction and control of the relevant 2* ODH. Such dispensations should only be issued where the training activity to be conducted is beneficial in meeting the requirement to train to meet a specific operational task.

b. **Equipment Capability Shortfall.** The majority of risk referrals are likely to be in relation to equipment and will result in referral by the DE&S. If DE&S cannot provide sufficient risk reduction through technical means, the Operating Centre Director will refer the risk to the Capability owner, who in the Army's case is D Cap. A RRWG will then provide advice or measures to the Fd Army HQ for them to mitigate the risk. These are likely to include:

(1) Technical solution. These may be time bounded. (eg Re-engineered Warrior Final Drive and GPMG Barrel replacement).

(2) Changes to the operating envelope. (eg PCLV 3rd seat, carriage of personnel in the rear of Pinzgauer).

(3) Improved training, supervision and information.

19. Where the referred risk is pan-Army and is deemed tolerable by the DH facing SME, agreement will need to be sought from HQ Fd Army. HQ Fd Army will then discuss the risk with the 2* ODH and potentially agree to retain the risk. In this instance, HQ Fd Army will issue a Dispensation to 2* Fmns which will detail the mitigations and control measures for them to exercise. A record of the dispensation must be retained on the Fmn risk register. Where the Army is the designated Lead User, a copy of the dispensation must be agreed with other TLBs who use the equipment.

20. In an Operational Theatre, dispensations (Op Disp) may be required when the routine use of equipment is knowingly being operated outside its safe operating envelope as defined by the SC for a justifiable military benefit. This includes equipment being used to conduct RSOI training in the operational theatre. The Op Disp process is shown at Annex B to this Chapter.

21. The Op Disp process is designed to support Theatre Commanders who, for operational reasons, eg to meet an emerging threat, require utilising equipment outside of its SC on an enduring basis for an operational tour. In general, equipment is probably being used outside the SC when operated in a way that is neither instructed during training nor documented in user and support publications. When such usage is identified, the in-Theatre SME should ascertain whether this contravenes the existing SC through consultation with the DE&S PT and relevant HoC. The Op Disp process is illustrated below.

22. A request for an Op Disp should be made by the Th EC Cell to the relevant force generating chain of command, normally at the 1* level. It should outline the requirement for the change of use of the equipment, the risks associated with this change and the mitigation measures that are to be implemented. If the irregular activity is confirmed as being outside of the existing SC, the force generating 1* chain of command is empowered to authorise an Initial (28-day) Op Disp. It must be copied to PJHQ J3 for entry on to the theatre dispensation register, the relevant HoC and DE&S PT.

23. Following authorisation of the Initial Op Disp, the Theatre EC Cell³ must submit a Urgent Statement of User Requirement (USUR)⁴ to PJHQ J3 EC defining the requirement and seeking an urgent review of the SC. Submissions must include an operational assessment of the impact of the dispensation not being approved, expressed in terms of risk of death or injury through hostile action balanced against the continued use of the equipment outside its existing SC (taking into account in-Theatre risk mitigations detailed in the initial Op Disp). USUR submissions are to be staffed to Army HQ – Army CapPFO-Plans-CSS-SO1 for dissemination to the appropriate HoC lead.

24. The relevant HoC, on being informed that the Initial Op Disp has been granted, must liaise with supporting SMEs and the relevant PT and urgently convene an extraordinary Dispensation Safety Panel (DSP) meeting to coincide with the endorsement of the USUR. The DSP shall be chaired by the HoC at a minimum of OF4/SO1 level; it shall have appropriate user representation⁵.

25. The DSP will assess the risks associated with the requested change of use of the equipment and, any interim in-Theatre mitigations (controls) in place and, identify any further mitigation measures with the aim of bringing the change of use within a revised SC. Risks are to be considered in the operational context and the extent to which practical solutions can be implemented to mitigate them. The HoC should also start investigating other solution options, including new equipment through UOR, enabled by the USUR raised.

26. If the risk can be mitigated within the initial 28-day dispensation period, the chair of the DSP will on behalf of the HoC, direct the amendment of the SC and inform PJHQ J3 EC of the decision. PJHQ J3 EC are to record the date of completion on the theatre dispensation register and, inform the Theatre EC Cell such that the Initial Op Disp can be closed, superseded by a revised SC, once mitigation measures have been implemented. Acceptance of risk may be sanctioned through a variety of means for example (but not limited to) DSP Minutes or Records of Decisions, a SCR and SC amendment.

27. If the risk cannot be mitigated within the initial 28-day dispensation period, eg when it has not been possible to immediately identify or implement appropriate mitigation measures for the risks identified, the chair of the DSP shall produce an Op Disp Report. The report is to be completed within the initial 28-day dispensation period and must recommend that PJHQ/chain of command seek an Op Disp from the relevant force generating 2* commander.

28. On receipt of the report, if the requirement remains extant, the force generating 1* commander may then issue a further temporary (28-day) dispensation in order to allow time for the Op Disp to be referred to the force generating 2*. It is expected that the majority of cases will be solved without referral. It should be noted that the DSP will only take into account practical solutions and will not make a judgment on the operational imperative.

29. The force generating 2* commander will evaluate the request within the 2nd 28 day period and will either:

- a. Tolerate the risk and provide an Op Disp, or

³ Where a Theatre of operations does not have an EC Cell this function should be undertaken by the National Support Element.

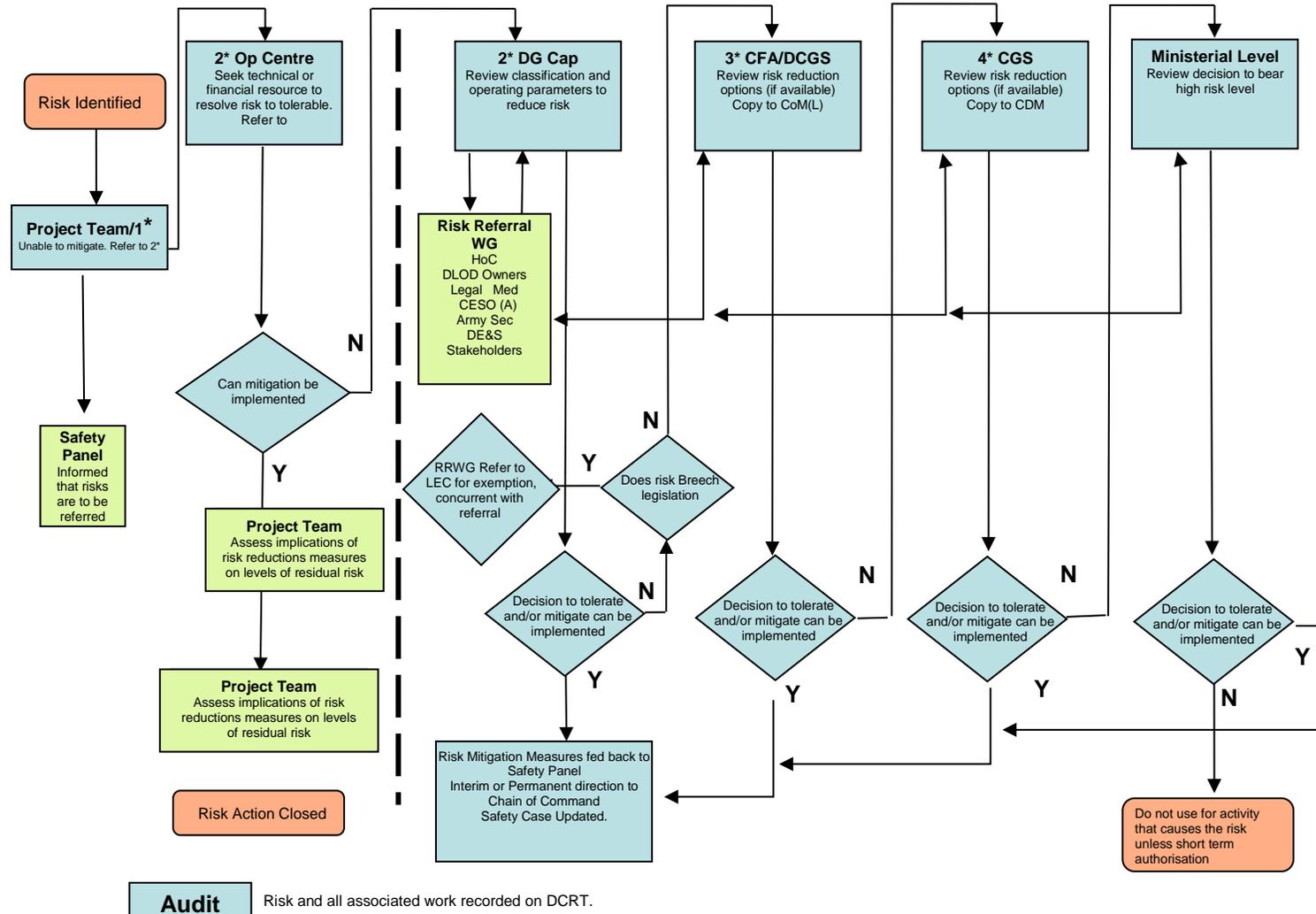
⁴ A USUR is part of the UOR process defined by 2016DIN04-148 UOR Standing Instruction.

⁵ Routine attendance should not be assumed, and user representatives from all levels should be anticipated.

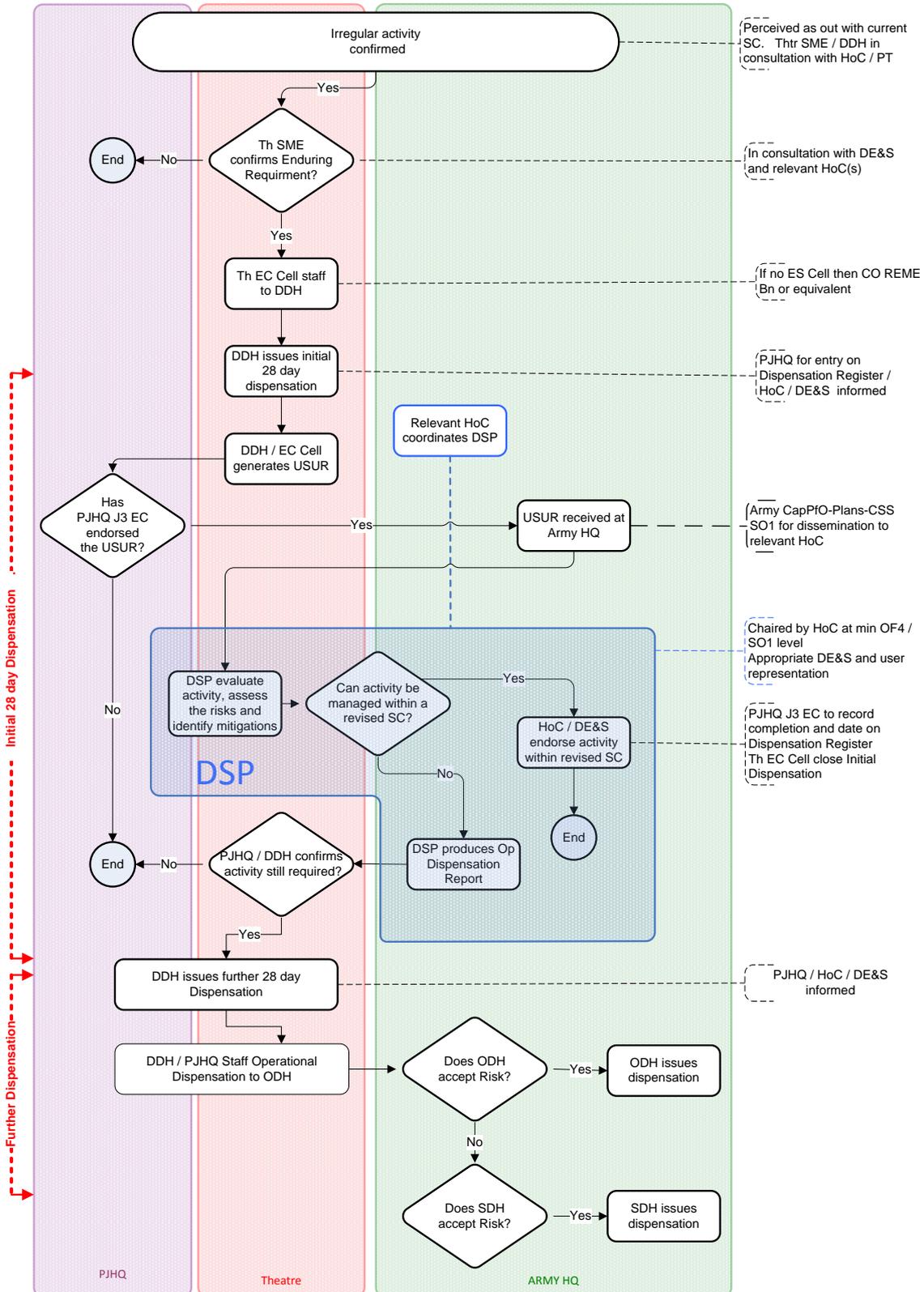
b. refer the risk to higher formation for consideration.

30. All operational dispensations are to be reviewed frequently, as a minimum, every 6 months, to ensure the requirement remains extant, that controls remain in place and, whether any subsequent mitigation has or can be put in place to further reduce the risk(s).

ARMY RISK REFERRAL PROCESS



OPERATIONAL RISK REFERRAL AND DISPENSATION PROCESS.



THE PROCEDURES COVERED IN THIS CHAPTER ARE CURRENTLY SUBJECT TO A REVIEW OF HOW THEY WILL BE CONDUCTED UNDER THE NEW AOM. THE ARRANGEMENTS PREVIOUSLY DETAILED IN LFSO 3216 - 2015 ARE REPRODUCED HERE AND REMAIN EXTANT UNTIL THE NEW PROCEDURES ARE CONFIRMED AND THIS CHAPTER IS AMENDED.

CHAPTER 6

CAPABILITY MANAGEMENT - ROLE AND RESPONSIBILITIES

1. Capability is defined in the AOM¹ as the enduring ability to deliver an effect or outcome that is relative to the threat, the environment and the coalition contribution (source: *UK MOD Acquisition System Guidance*). The ability to achieve a strategic or campaign level effect or end state in the context of defence planning (source: *Capability Management Practitioners' Guide*). In the Army, capability is used to describe all capability: ie Military Capability, Personnel Capability, Information Capability, etc. Land Military Capability (Land MILCAP) describes specific Land 'generated force' capabilities such as Air Manoeuvre or Dismounted Close Combat.
2. This function is led by D Cap and has primary outputs of Force Structures (current, transition and future), Capability and Directorate Change Management Plans (CMPs/DMPs), Change Initiatives, Programme (Pg) CONEMPs and Pg URDs.

Taxonomy

3. The AOM distinguishes the roles of the four star headquarters and the three star commands by adopting the Defence taxonomy, which for the Army means:
 - a. **Direct.** The Direct function understands the strategic context, makes policy and strategy, produces the Command Plan, and defines and resources the necessary military capability.
 - b. **Develop.** The Develop function plans capability out to 30 years. Its aim is to identify the required benefits from investment and shape the Change Portfolio to enable the achievement of the Army Board Strategic Objectives in line with the DSD.
 - c. **Deliver.** The Deliver function enables Senior Responsible Owners (SROs) to drive the attainment of outcomes and delivery of benefits, in line with the intention of the change initiative as detailed in the Programme Mandate.
 - d. **Generate.** The Generate function produces the force elements needed to meet current operations and potential Military Tasks, realises the benefits of the Change Portfolio and contributes to developing the Future Force.
 - e. **Operate.** The Operate function in Commands is to operate and sustain force elements to execute Military Tasks and achieve military effects overseas and in the UK (including home-based operations, resilience and the Firm Base).
 - f. **Assure.** The Assure function provides all systematic actions necessary to provide confidence that the target (system, process, Organization, programme, project, outcome, benefit or output) is appropriate, strategically aligned and coherent; and that management information and business intelligence is reliable. This includes supporting CGS in the discharge of his role as Senior Duty Holder.

¹ The Army Operating Model v2.0 dated Apr 16.

g. **Operate.** The Operate function in Commands is to operate and sustain force elements to execute Military Tasks and achieve military effects overseas and in the UK (including hhome-based operations, resilience and the Firm Base).

4. The four-star Headquarters undertakes all activity concerned with the functions of 'Direct', 'Develop' and 'Deliver' unless there are compelling reasons not to do so. The three-star Commands undertake activity concerned with the 'Generate' and 'Operate' functions. The 'Assure' function is overseen by the four-star headquarters but elements of assurance activity are undertaken by all levels of the Army. The 'Direct' and 'Assure' functions are connected to each of the other functions at multiple points.

Management

5. **Management of Capability.** Army HQ leads the development of capability strategy and planning through the Capability Management Sub Strategy lead by D Cap. Capability Sponsors provide the long-term, through-life proponency and conscience for specific capabilities and sit within the Heads of Capability (HoC).

6. **Key Roles and Responsibilities.** The following have key roles and responsibilities within the capability management area:

a. **D Cap.** D Cap will co-ordinate the development of prioritised capability change initiatives/ Courses of Action (COA) in order to define the Army portfolio. In addition, D Cap is responsible for; the identification of Senior Responsible Owners (SRO), overseeing through life capability sponsors for generated force capabilities; acts as the lead Training Requirements Authority for Army Training.

b. **D Sp.** D Sp Develops the Army Support Sub-Strategy (in conjunction with D Strat and D Cap) and sets associated policy; Leads the Support Sub-Portfolio and performance manages the change programmes/projects (pan-DLoD) within it. Delivers equipment, logistics and materiel to field forces. Conducts through-life support planning for equipment and logistics; is the Army's Intelligent Customer with external providers of Equipment, Logistics, associated Services and Support; sets and manages the Army's requirement with DE&S in the Command Acquisition Support Plan (CASP) and leads the relationship with Babcock on behalf of Defence.

c. **CFA.** CFA Commands the Field Army's capabilities, informs requirements setting for current and future capability, stands up Business Change Managers (BCMs), realises the benefits of change investment and supports in-service management.

d. **SRO.** The SRO role is defined as the single individual with overall responsibility for ensuring that a project or programme meets its objectives and delivers the projected benefits. The SRO is personally responsible for cross-DLoD integration up to IOC, ensuring all DLoDs are orchestrated to achieve programme outcomes and deliver operational capability into service. At the point of handover into service, this responsibility will be transferred to the In Service Manager. The SRO will also:

(1) Oversee all aspects of programme delivery to ensure that it is successfully implemented with the required outcomes delivered to the agreed PCT, that risks are managed and the potential of the change or capability is fully exploited.

(2) Setting up appropriate programme governance arrangements including: establishing and chairing the Programme Board and seeking appropriate assurance that the Programme risk management, control and governance is appropriate and effective.

(3) The SRO is responsible for declaring when Initial Operating Capability (IOC)/Full Operating Capability (FOC) has been attained, in conjunction with the end user/ BCM.

e. **BCM.** The role of the BCM during each phase of the programme lifecycle is as follows:

(1) During Programme Identification/Programme Definition, the BCM will provide advice on requirements generation, Mandate development (especially definition of IOC, FOC and expected handover points) and expected benefits.

(2) Initially attend the CIWG and provide advice to the Programme Manager on the integration of the change/capability into Business as Usual (BaU). From the point at which the Programme Manager transfers Chair of the CIWG to the BCM, the BCM will take the lead on integrating the change into BaU.

f. **DLoDs.** The purpose of a DLoD is to promote coherence within Defence Capability by providing policy, strategy, rules, guidance and advice on the range of factors that need to be considered by Army HQ governance bodies when making decisions, both on change and in generating force elements (FEs) in business as usual (BAU). DLoD lead are shown in the table below:

DLoD	ECAB 2* Lead	1* Lead
Training Capability	D Cap	HoC Trg
Equipment	D Sp	Hd Eqpt
Personnel	D Pers	Hd Pers Cap
Information	D Info	Hd CSD
Concepts & Doctrine	D Strat	Hd Strat
Organization	D Strat	Hd Strat
Infrastructure	D B&I	Hd Infra Plans
Logistics	D Sp	Hd Log

Process

7. **Programme Delivery and Integration.** The SRO leads and directs each change programme and will chair a Programme Board (PB) to oversee and direct delivery of the programme. The PB is to be attended by the project leads, SME, DLoD representatives and the BCM (when required).

8. To facilitate integration of change activity into BaU, the SRO is supported by a regular Capability Integration Working Group (CIWG) – which has agreed terms of reference, governance, frequency, attendance, agenda and ways of working. The CIWG supports the SRO by providing advice, guidance and planning input on integration, but is not a formal sub-group of the programme. The CIWG is initially chaired by the Programme Manager (on behalf of the SRO) with the Chair transferring to the BCM at an appropriate point.

9. Army HQ supports the test, evaluation and acceptance of capabilities in to service. Each Programme Manager is responsible for gathering the evidence and analysis to demonstrate that the capability generated meets the acceptance criteria.

Safety Case Management

10. A Safety Case (SC) is defined as “a structured argument, supported by a body of evidence that provides a compelling, comprehensible and valid case that a system is safe for a given application in a given operating environment”. The management of Safety Cases (SC) is a through life activity and requires a co-signatory at Part 3 to ensure that the user understands the any

limitations on operational capability and the safe use of the capability (safety envelope). The current system for the management of SCM is under review and therefore this ACSO reflects that in the interim period the process by which SCM should be managed is as follows:

- a. D Cap retains ownership of Capability Safety Management, which he discharges through the HoCs.
- b. The HoCs are responsible for coordinating Capability Safety Management activity (attendance at safety meetings, sign off of Part 3 safety cases, etc) for those capabilities which have been assigned to them².
- c. D Sp owns the liability for the 7 civilian safety SQEP, organised under Hd Integrate. These civilian staff will be available, on request, to assist D Cap and the HoCs to fulfil their safety responsibilities.
- d. The HoCs may call upon military staff SQEP within the Support Directorate to help conduct Capability Safety Management activity. Support for safety activity is to take priority over other tasks³.

11. The staff lead for monitoring Capability Safety Management on behalf of D Cap remains SO1 CSS Plans. Significant problems experienced by the HoC staff with conducting this safety activity over the interim period should be notified to SO1 CSS Plans, in order to maintain D Cap's and CESO(A)'s situational awareness.

12. **Roles and Responsibilities.** HoCs are responsible for:

- a. Developing suitable plans and processes that must then be implemented to address risks and issues that may impact the delivery of an overall capability. To do this they must review the risks and issues in and across each of the DLoDs⁴. The HoC responsibilities include setting HS&EP requirements during the planning stages of a capability's life and ensuring that these are met throughout a capability's life. They must ensure that capability can be fielded safely and that suitable and sufficient training exists for the capability at all times throughout its service life. This, when combined with the various elements from other DLoDs, allows the user to apply a robust Safe System of Work⁵/Training.
- b. Working with stakeholders across all DLoDs and in conjunction with the relevant DTL, in order to:
 - (1) Identify safety requirements for new capabilities during Project Start-up/Project Foundation (PSPF). This task needs to be performed in conjunction with the relevant Duty Holders (ODH/DDH).
 - (2) Direct the safety requirements in a capability's User Requirements Document (URD), consulting safety specialists as necessary, so that the Secretary of State's policy is met⁶.
 - (3) Ensure that the requirements of MOD safety policy are met throughout the project. This task needs to be performed in conjunction with the relevant Duty Holders during the latter element towards in-service.

² Capability safety ownership is set out in the [Equipment Safety Matrix Improved](#).

³ Meeting between D Cap and D Sp to discuss safety management on 26 Oct 16.

⁴ It should be noted that the equipment DLoD is specifically managed by D Eqpt (on behalf of D Sup) and his staff are organized to support HoCs.

⁵ Safe Place, Safe Person, Safe Equipment, Safe Practice.

⁶ DSA 01.1.

(4) Provide appropriate detail of the safety requirements for inclusion in the Systems Requirements Document (SRD).

(5) Ensure that safety risks are identified and managed such that they are ALARP and either broadly acceptable or tolerable. This task needs to be performed together with the DTL.

(6) Ensure that risk controls and mitigating measures, across the DLoDs, are implemented in a timely manner. Appropriate details of the implementation of these controls must be passed to the DT project staff such that they can document it in support of their SC audit trail.

(7) Ensure that periodic review of the standards and policy for the operation of their respective capabilities is conducted. This shall include a review of the hazard log and verification that the mitigation (controls) are still appropriate, particularly following any upgrade programmes; assurance is to be provided annually to D Cap, copied to the DTL.

(8) Ensure that a User Representative attends DE&S Safety Panels (SP)/Safety Committees, to provide effective communication of user issues. User representatives should be encouraged to complete the System Safety Awareness online training prior to attendance to ensure the overall SQEP of the panel.

(9) Staff Dispensations where an equipment or platform requires to be operated outside of the endorsed SC⁷. Initial details will be provided by the ODH/DDH/PJHQ. The staffing process must include advice as necessary, provided by the CE(A) and Safety Assurance Team within Eqpt Dir as well as advice from D Trg's staff.

(10) Engage as required, with those undertaking accident/incident investigations.

(11) Staff exemption cases in conjunction with DTs through to the Land Exemption Committee.

(12) Staff risk referrals as necessary.

c. Ensuring that Equipment and Training Safety Policy is compliant with the direction in this ACSO, other MOD Policy that is applicable and current legislation.

d. Ensuring that their Training Development Teams (TDTs) and Training Policy staff are proactive in keeping abreast with PT equipment modifications and the potential issues arising from either change of concept, change of use, change of user requirement or change of equipment modification state. This includes the development of Safety Notification via E-Mail (SNvE) in accordance with DE&S policy⁸, following consultation with CE(A), D Eqpt, Eqpt Ops and relevant Fleet Manager SME.

e. Ensuring that procedures and policy are reviewed as a result of recommendations, whether by Defence AIB, SI or external reports, are promulgated to the Chain of Command and implemented.

f. Providing the ACAI function to carry out the following:

(1) Act as the HS&EP advisor to ensure equipment operating and maintenance policy is compliant with UK law, MOD policy and the policy contained in the statement set out by the Secretary of State.

⁷ Refer to DSA03.DLSR.LSSR - DCoP G for detail of the Op Dispensation process.

⁸ <http://cui6-uk.diif.r.mil.uk/r/76/sead/Qual/QMS%20Fixed/20140320-DLE-QMS-Part%203-SQ-BP-001-Safety%20Notice%20via%20Email-QM-U.doc>

- (2) Ensure that Training Policy is suitable and sufficient to deliver capability safely.
- (3) Provide safety advice to the Chain of Command on the implementation of Training Safety, whilst remaining cognisant of the need to allow the necessary freedom of action to prepare for operational activity.
- (4) As required, act as a member on equipment SP/Safety Committees and when required chair/attend meetings such as the Capability Working Group/Capability Integration Group, Capability Integration Working Group (CIWG)/Availability Working Group (AWG) and LSSWG.
- (5) Liaison with CESO(A) and the Army Inspectorate.
- (6) Ensure that the periodic review of Part 3 SC and Hazard Logs are being appropriately managed by DTs.
- (7) Provide SME safety advice to equipment trials from a Front Line Command perspective.
- (8) Review adverse event investigations to provide information for both good practice and lessons learned processes.
- (9) Conduct adverse event reviews to seek and learn safety lessons, distributing good practice guidance and safety procedures.

13. Equipment modified without PT endorsement take that equipment outside the SC and it can therefore **no longer** be considered safe by design. Personnel who have implemented the unauthorised modification are responsible and culpable for all associated risks and any legislative non-compliance, due to that unauthorised modification. Units must adhere to the policy on Configuration Management, particularly on Land In-Service Local Modifications⁹.

14. The Part 3 SC sets out the argument for in-service (Operation and Support) S&EP compliance for a particular capability. It is developed and maintained by the PT, but is formally owned by the HoC on behalf of the Front Line Command¹⁰.

15. The End User who is charged with operating¹¹ the capability is to comply (or be in a position to explain otherwise) with the direction given in the SC. The End User will not necessarily see the SC or SCR, however direction will be articulated through the risk controls ie In user documentation, training, warnings and cautions etc.

16. Chief of Materiel/Chief Information Officer delegate responsibility for the through life safety management of a capability to the DTL. To ensure that safety management is conducted reasonably, each DT establishes and chairs a SP/ Safety Committee of suitably qualified and experienced personnel (SQEP).

17. D Cap delegates authority for ownership of the Part 3 SC (Operation and Support Safety) on behalf of the Front Line Command to his HoC in accordance with the D Cap Responsibility Matrix. To provide through life management of capability, each HoC establishes a CIWG¹² whose chief purpose is to ensure all DLoDs are fully matured prior to the capability's In Service Date (ISD). DLoD leads help develop evidence to support SC by implementing risk controls such as establishing a training package for the user and the maintainer. The DT Safety Manager reports

⁹ Details contained in the Defence Logistics Framework (formerly JSP 886).

¹⁰ DG Capability/4/5/10 dated 6 Jul 12.

¹¹ In this case this will be the Head of Establishment (HoE).

¹² A CIWG may include many or single capabilities and is tailored by the CD according to resource available and the type and stage of the capability in question.

SC development progress¹³ against milestone events¹⁴ through the equipment DLoD representative at the CIWG.

18. At ISD, the HoC as the designated Lead User, liaises with DG LS&E's 1* directorates to identify the chair for the AWG. The AWG predominantly manages the equipment, training and logistics DLoDs although the CIWG remains responsible for endorsing safety decisions through life, and may also need to reform to manage capability upgrades, operational dispensations etc.

19. **Part 3 SC Endorsement.** The Part 3 SC Endorsement/Review process is shown at Annex A to this Chapter¹⁵ with an example template at Annex B to this Chapter. Prior to ISD, or at annual review date, the DT Safety Manager notifies the appropriate CIWG/AWG of the intention to review and endorse the Part 3 SC. The DT Safety Manager completes Parts 1 to 4 and then submits the template to the CIWG secretary¹⁶ seeking supporting DLoD and HoC statements.

20. On receipt, the CIWG Secretary: notifies the CIWG/AWG chair and HoC Safety Advisor¹⁷; identifies DLoD leads (by Organization) and the relevant Lead User (HoC) staff in order to obtain necessary supporting safety statements. The CIWG Sec then completes Parts 5, 6a, 7 and 8 of the template.

21. DLoD leads are to provide the CIWG/AWG Secretary with a statement confirming, or otherwise, that the risk controls are suitable and sufficient and remain in place. The HoC is to provide the CIWG/AWG secretary with a statement confirming, or otherwise, that the equipment is being used as intended and that limitations of use are identified and in place. To assist the SC Review process, they provide supporting statements appropriate with the complexity and stage of the programme. It is likely that there will be more verification and validation activity prior to ISD, and that evidence may be substantial as the Project matures (for example through trend analysis) after ISD. Therefore, the statement is most likely a tailored summary of the DLoD/AWG activity. This is also an opportunity for the CIWG/AWG Chairman to better understand and become familiar with the current issues surrounding the capability. In consultation with the PT Safety Manager, it will allow them to advise better the DLoD leads on the end product required. The CIWG/AWG Secretary is to complete Part 6b and return the e-template to the DT Safety Manager.

22. Once the supporting statements have been provided to the DT Safety Manager, the latter will gather all other necessary evidence, set the agenda for the review of the SC and convene a SP/Safety Committee to review the SCR. Where the evidence suggests that greater than normal visibility is required by the CIWG/AWG Chair, in order to prevent unnecessary delay and duplication of effort, the CIWG Chair is to attend the SP/Safety Committee. Normally, the Advisory Statement can be supported through engagement with the HoC who will attend the SP/Safety Committee. Reviews will include the:

- a. Impact of any requirements changes.
- b. Impact of any legislative changes.
- c. Impact of any incidents, accidents or failures.
- d. Whether there has been a change in use of the capability.
- e. Assessment of assurance reports from the HoC.
- f. Assessment of maturity statements from DLoDs.

¹³ Production of the Part 1, 2 and 3 SCR.

¹⁴ Initial Gate, Main Gate, In Service Date and annual review.

¹⁵ Legacy equipments may not have been subjected to the CIWG process.

¹⁶ If CIWG is not known, the template should be submitted to the HoC's Capability Single Point of Contact (SPOC) or the Safety SPOC.

¹⁷ Legacy equipments may not have been subjected to the CIWG process. If CIWG is not known, the template should be submitted to the HoC's Capability Single Point of Contact (SPOC) or the Safety SPOC if not already aware.

23. Having gained SCR approval the DT Safety Manager archives all the supporting evidence, and adds links to these on the template before submitting the completed template¹⁸ to the DTL for Part 3 SCR endorsement and to the CIWG Secretary for HoC endorsement¹⁹. The CIWG Chair assesses the evidence, cognisant that the SP/Safety Committee has already approved the SCR. The Chair in making their recommendation to the HoC²⁰ via an advisory statement reports whether:

- a. The Chair has/has not undertaken Systems Safety in Action training and is SQEP in accordance with ACSO 3216.
- b. All DLoDs have/have not provided supporting statements that risk controls are in place.
- c. The HoC has/has not provided supporting statements that the equipment is being used as intended and all limitations of use have been identified and restrictions in place.
- d. The SP/Safety Committee has approved the SCR.
- e. The HoC was/was not represented was/was not SQEP and attended the SP/Safety Committee.
- f. The HoC Safety Advisor has/has not been consulted (where necessary).

24. Following HoC signature, the endorsed SCR is returned by the CIWG Secretary to the DT Safety Manager for retention.

25. The SP/Safety Committee is the forum through which the DT Safety Manager manages safety, including the development of the Part 3 SCR and Hazard Log. The aim of the Part 3 SC Review is to demonstrate that the residual risk is ALARP. It should demonstrate that²¹:

- a. The maintenance policy and arrangements meet the system(s) requirements.
- b. The training policy and arrangements meet any stipulated system(s) requirements.
- c. Operating documentation is available that identifies any procedures for the acceptably safe operation of the system.
- d. Limitations of use are identified and any safety related restrictions have been imposed on the operation of the system.
- e. Emergency and contingency arrangements are identified and in place.
- f. Arrangements are in place for monitoring safety performance and maintaining the SC.
- g. Resources are in place to maintain the acceptably safe operation of the system through life and these are identified to the SP/Safety Committee.
- h. Matters that cannot be resolved by the SP/Safety Committee must be raised to the CIWG for resolution.

26. The HoC represents²² the FLC on SP/Safety Committees. After the Part 3 SCR has been approved by the SP/Safety Committee, it is submitted to the DTL and HoC for their initial joint endorsement at declaration of ISD, and annually thereafter²³. It does not need to be re-signed

¹⁸ All reference links are to be established as Records.

¹⁹ HoC may determine the appropriate level for endorsement of SCR based on risk posed by capability.

²⁰ Or delegated appointment.

²¹ DSA02.DLSR.LSSR: Land System Safety and Environmental Protection – Directive and DSA03.DLSR/LSSR: Land System Safety and Environmental Protection – Defence Codes of Practice.

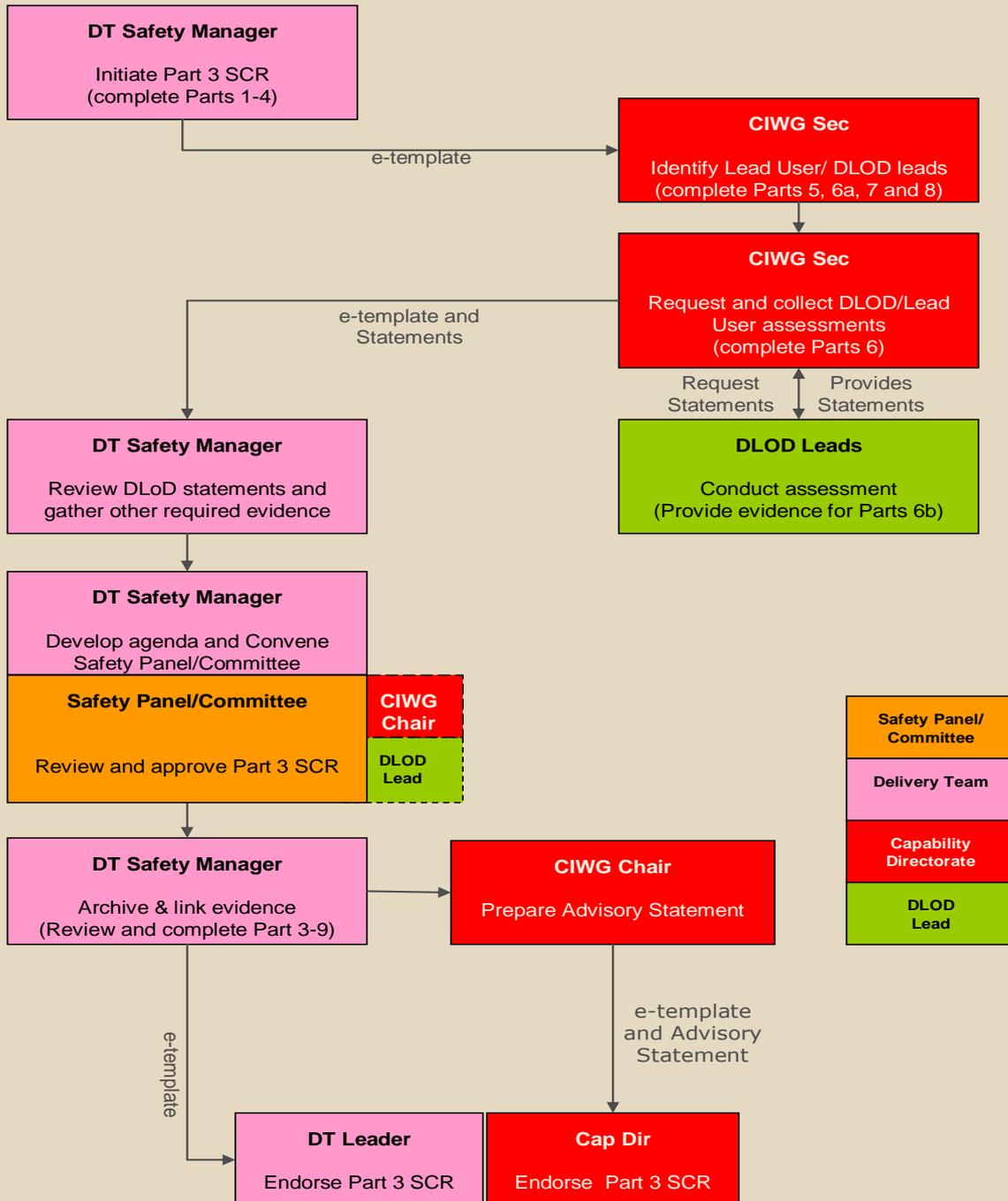
²² Or arrange for other empowered representation to attend.

²³ Annually or tailored - see DSA02.DLSR.LSSR: Land System Safety and Environmental Protection – Directive and DSA03.DLSR/LSSR: Land System Safety and Environmental Protection – Defence Codes of Practice.

each year other than when a significant change occurs that requires an uplift to the SC. If, following joint review, there is no change this should be recorded in the minutes of the SP/Safety Committee to provide the audit trail.



Part 3 Safety Case Review Process

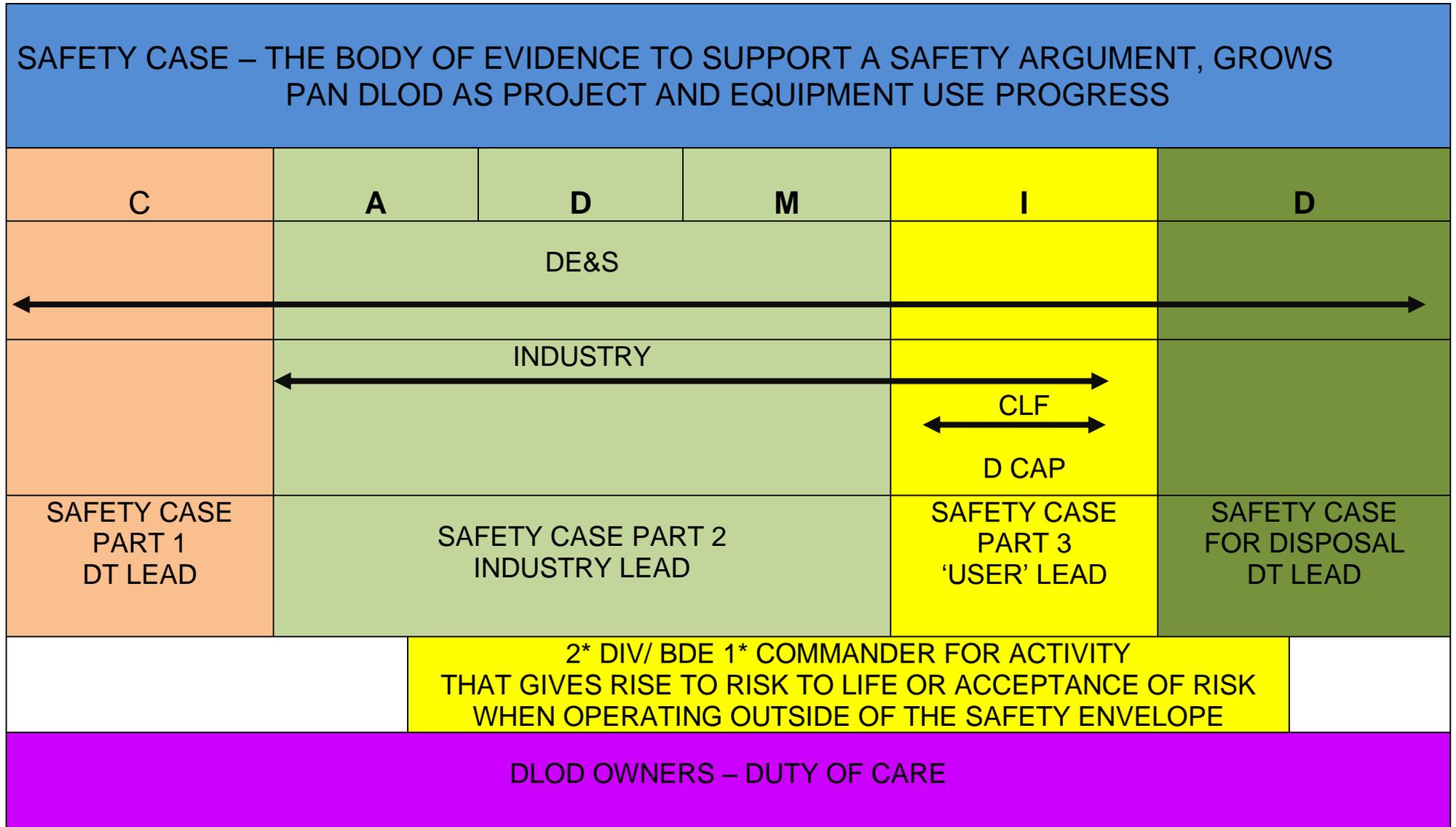


Part 3 Capability Safety Case Endorsement e-Template Guide

1. Capability Programme Name:		Last Endorsement Date:	
2. Capability Safety Manager:		Management Delegated Authority:	
3. Safety Environment Management Plan :			
4. Part 3 Safety Case:			
5. CIWG Chairman:		Part 3 Safety Case Ownership Authority:	Capability Responsibility Matrix
6. DLOD Maturity Statements:	6.a CIWG DLOD Owner	6b. Link	Additional Remarks
Training			
Equipment			
Personnel			
Infrastructure			
Doctrine			
Organization			
Information			
Logistics			
Security			
7. AWG Chairman:		Lead User Delegated Authority ¹ :	
8. HoC Supporting Statement:			
9. Safety Panel Part 3 SCR Approval RODs Link:			

¹ Where Lead User receives authority from.

SAFETY RESPONSIBILITIES THROUGHOUT THE CADMID CYCLE



CHAPTER 7

ARMY SAFETY GOVERNANCE

1. In order to ensure that S&EP performance is optimised, it will be driven by CGS who will chair an annual Army Safety Committee (ASC). This top-level governance will ensure CGS and key senior officers in Safety-facing roles will maintain an awareness of critical Safety issues and provide governance to manage Safety risk. It is the forum in which CGS will review Safety performance over the previous 12-months and set priorities for the forthcoming year. The TORs for the ASC are at Annex A.

2. In his role as the Army's Safety Champion, DCGS will chair a biannual Army Safety Sub Committee (ASSC). The role of the ASSC is to support CGS in his role as the TLB's Senior Duty Holder and to monitor progress of the work directed by the ASC. It will also serve to prepare DCGS for his attendance at the tri-annual Defence Safety Committee (DSC) chaired by DG DSA. The TORs for the ASSC are at Annex B.

3. The ASSC will be supported by the quartely Army Safety and Environment Working Group (ASEWG) chaired by CESO(A). This is a desk level forum with representation from Safety staff and desk officers leading on key Safety issues. It will take direction from the ASSC for which it will provide updates and briefings. The TORs for the ASEWG are at Annex C.

4. The battle rhythm for Army safety governance is shown below:



TERMS OF REFERENCE FOR THE ARMY SAFETY COMMITTEE

Background

1. The Army Safety Committee (ASC) is the Army's strategic safety and environment governance board. Its remit covers all Army personnel, equipment, infrastructure and activity, irrespective of command arrangements with other TLBs, and others who may be affected by the Army's acts or omissions. Its role is to ensure that the Army's Safety Management System remains fit for purpose, is adhered to, assured and adequately resourced. It has continuous improvement of Safety as its central tenet and recognises that S&EP underpins the physical and morale components of fighting power and is therefore an enabler of Army capability. The ASC will be supported by the Army Safety Sub-Committee (ASSC) chaired by DCGS – the Army's Safety Champion.

Terms of Reference

2. As the Army's strategic safety governance committee, the ASC will:
- a. Inform, develop and promulgate strategic-level Safety policy for the Army, ensuring it is mature and mapped to MOD Safety policy.
 - b. Consider all risks owned by the SDH and key risks owned by ODHs to ensure that:
 - (1) They continue to be held at the appropriate level – directing that they are appropriately Treated, Tolerated, Terminated or Transferred.
 - (2) They are ALARP and tolerable to the risk owner.
 - (3) Compound risks are identified and managed.
 - c. Review priorities for investment in safety-critical areas in order to reduce risks and hazard levels.
 - d. Confirm compliance with safety legislation, noting Derogations, Exemptions and Disapplication (DEDs) as appropriate, and consider the impact and implications to Army activity of emerging legislation or policy.
 - e. Consider and analyse safety data in order to identify trends, direct mitigating action, risk ownership and wider implications (eg reputational and/or financial risk).
 - f. Set safety-related priorities and direct the activity of the ASSC.

Membership

3. CGS, as the Army SDH, will chair the ASC. Membership is shown in the table below:

Ser	Member	
1	DCGS	Army Safety Champion
2	CFA / COS FA	3* Oversight and ODH
3	CHC	3* Oversight
4	GOC 1XX	ODH
5	GOC 3XX	ODH
6	GOC FTC	ODH
7	GOC Regional Command	ODH
8	GOC LONDIST	ODH
9	Dir LW	ODH
10	GOC ARITC	ODH
11	Comd JHC	ODH
12	D Cap	ODH and Champion for through-life Safe Capability
13	D Sp	Safe Eqpt proponent
14	D Pers	Safe People proponent
15	D Infra	Safe Place proponent
16	DALS	Legal advice
17	Army Inspector	Assurance and Compliance
18	Senior Health Advisor	Health
19	Chief Safety Advisor	HS&EP – Annual Assurance Report author
20	CESO(A) SO1 Audit	Secretariat

4. The following will be invited to attend as required:

21	Defence Land Safety Regulator	DSA/Regulator perspective
22	ACOS Fd Army Trg Br	Collective Training Issues
23	JFC Rep	
24	RN/RM Rep	
25	RAF Rep	
26	Guest speaker	Civilian perspective (industry or HSE)

Timing

5. The ASC will meet annually in Mar/Apr in order to review the previous year's performance and set priorities for the forthcoming year.

Agenda

6. The standing ASC agenda is shown below¹:

¹ This may be amended as required by CGS or DCGS.

ARMY SAFETY COMMITTEE – DRAFT STANDING AGENDA

Item	Output	Lead
1. Opening Comments		Chair
2. Review Actions from Last Meeting	Progress update on actions arising from the last ASC.	DCGS/CESO(A)
3. Review Safety Performance and DRAFT AAR	Review of Safety performance since last meeting and consider DRAFT AAR.	CESO(A)
4. Review Safety Risks	Update on all Safety risks owned by the SDH. Update on key risks owned by ODHs. Review pan-Army risks. Assess potential Safety impacts from future change programmes, investment decisions, legislation and policy changes, etc.	DCGS/CESO(A) ODHs DCGS/CESO(A) DCGS/CESO(A)
5. Review Safety Governance Arrangements and Policy	Confirm or adjust/amend Governance structures and Policy.	CESO(A)
6. Investigation and Inquiry Update	Update on accident investigations and SIs.	CESO(A) D Pers
7. AOB	As raised by ASC members.	Chair
8. Safety Priorities	SDH briefs his Safety priorities for the next period.	Chair
9. Closing Remarks	SDH assessment of current and future Army Safety risk profile and whether RtL is tolerable and ALARP.	Chair
10. DONM		Sec

TERMS OF REFERENCE FOR THE ARMY SAFETY SUB-COMMITTEE

Background

1. The ASSC will be chaired by DCGS, the Army's 'Safety Champion' and sit biannually. It will be scheduled to prepare DCGS for the Defence Safety Committee (DSC) chaired by Director General Defence Safety Authority (DG DSA). It will also be in direct support of the annual ASC chaired by CGS. As such, the role of the ASSC is to take forward the direction of the ASC and support CGS in his role as the Army's SDH. Its scope and remit will cover all Army personnel, equipment, infrastructure and activity, irrespective of command arrangements with other TLBs, and others who may be affected by the Army's acts or omissions. It will ensure that the Army's Safety Management System remains fit for purpose, is adhered to, assured and adequately resourced. It has continuous improvement of Safety as its central tenet and recognises that S&EP underpins the physical and morale components of fighting power and is therefore an enabler of Army capability. The ASSC will be supported by the Army Safety and Environment Working Group (ASEWG).

Terms of Reference

2. The ASSC will:
- a. Inform and, if necessary, develop Army Safety policy, ensuring it remains appropriate, relevant and mapped to MOD Safety policy.
 - b. Provide DCGS with an opportunity to raise specific safety issues and consult key stakeholders prior to the biannual DSC.
 - c. Consider all risks owned by the SDH and key risks owned by ODHs to ensure that:
 - (1) They continue to be held at the appropriate level – directing that they are appropriately Treated, Tolerated, Terminated or Transferred.
 - (2) They are ALARP and tolerable to the risk owner.
 - (3) Compound risks are identified and managed.
 - d. Consider and analyse safety data in order to identify trends, direct mitigating action, risk ownership and wider implications (eg reputational and/or financial risk).
 - e. Review priorities for investment in safety-critical areas in order to reduce risks and hazard levels.
 - f. Confirm compliance with safety legislation, noting Derogations, Exemptions and Disapplication's (DEDs) as appropriate, and consider the impact and implications to Army activity of emerging legislation or policy.
 - g. Set safety-related priorities and direct the activity of the ASEWG.

Membership

3. DCGS will chair the ASSC. Membership is shown in the table below:

Ser	Member	
1	CFA Rep	ODH and 3* Oversight
2	CHC Rep	3* Oversight
3	1XX Rep	ODH
4	3XX Rep	ODH
5	FTC Rep	ODH
6	Regional Command Rep	ODH
7	LONDIST Rep	ODH
8	DLW Rep	ODH
9	ARITC Rep	ODH
10	JHC Rep	ODH
11	D Cap Rep	ODH and Champion for through-life Safe Capability
12	D Sp Rep	Safe Eqpt proponent
13	D Pers Rep	Safe People proponent
14	D Infra Rep	Safe Place proponent
15	Army Inspectorate Rep	Assurance and Compliance
16	BAS	Owner of Command Effectiveness LoO
17	Senior Health Advisor Rep	Health SME
18	Chief Safety Advisor/CESO(A)	HS&EP – Annual Assurance Report author
19	JFC CESO	Centre view
20	Chief Engr	Specialist Advice
21	CESO(A) SO1 Audit	Secretariat

4. The following will be invited to attend as required:

22	DALS Rep	Legal advice (HASAWA 74, Corporate Manslaughter etc.)
23	Defence Land Safety Regulator	DSA/Regulator perspective
24	ACOS Fd Army Trg Br	Collective Training Issues
25	SO1s FP	Supporting the Rep from their 2* commands
26	Guest speaker	Civilian perspective (industry or HSE)

Unless a particular appointment has been specified (eg Serial 20), attendance is expected to be at the COS/OF5/Command Safety Champion level.

Timing

5. The ASSC will meet biannually in May and Nov in order to prepare DCGS for the DSC.

TERMS OF REFERENCE FOR THE ARMY SAFETY AND ENVIRONMENT WORKING GROUP

Background

1. The ASEWG is the desk level S&EP forum that supports the ASC and ASSC chaired by CGS and DCGS respectively. It tracks the “Actions” that fall out of the ASC and ASSC, reviews S&EP performance and considers S&EP issues and risks for potential elevation to the Committee level. The ASEWG draws its membership from across the Army and has a key role in ensuring that the Army’s Safety and Environment Management System, based on Plan, Do, Check, Act, and Organization and Arrangements for S&EP remain fit for purpose.

Terms of Reference

2. The ASEWG will:
 - a. Convey the key messages from the ASC and ASSC and track the Actions arising from both meetings, directing and informing further work as required.
 - b. Review S&EP performance against KPIs, including:
 - (1) Fatalities.
 - (2) RIDDOR.
 - (3) Enforcement action.
 - (4) Other metrics as required (eg toxic spillages).
 - c. Consider papers from ASEWG members on S&EP issues that potentially require elevating to the ASSC level.
 - d. Review other S&EP issues as directed by CESO(A), such as:
 - (1) S&EP lesson learning.
 - (2) Equipment safety.
 - (3) Road safety.
 - (4) Fire risk.
 - (5) Infrastructure safety.
 - (6) Safety training.
 - (7) Provision of SQEP in safety critical posts.
 - (8) Communications and messaging.

- e. Discuss any other business raised by ASEWG members.
3. The ASEWG is chaired by CESO(A) and is to meet on a quarterly basis.
4. Membership of the Board is set at SO1 level and representation is required as follows:

1	CESO(A)	Chairman
2	DSA	DLSR
3	Fd Army	SO1 FP
4	HC	TBN
5	RC	SO1 FP
6	1 UKXX	SO1 FP
7	3 UKXX	SO1 FP
8	FTC	SO1 FP
9	LONDIST	SO1 FP
10	JHC	SO1 Grd Safety
11	DLW	DLW Rep
12	ARITC	SO1 SHE Advisor
13	DCESO(A)	DCESO(A)
14	CESO(A)	SO1 Safety Perf
15	CESO(A)	SO1 Audit
16	CESO(A)	SO1 Safety Policy, ASEWG Secretary
17	CESO(A)	SO2 EP
18	CESO(A)	SO2 Comms
19	D Sp	SO1 Strat
20	D Cap	SO1 COS
21	D Pers	SO1 Plans
22	D Resources	TBN
23	DALS	SO1 Emp Law
24	D Info	SO1 Concepts
25	Army Inspectorate	SO1 H&S
26	D B&I	TBN
27	SHA	SO1 Occ Med
28	APSG	SO1 SI
29	Hd Trg	SO1 Trg Pol
30	Hd Log	TBN
31	Hd Eqpt	SO1 Eqpt Stds
32	DIO	SD Trg HQ Plans Safety
33	DLW	SO1 Lessons
34	DFRMO	Hd DCO
35	DCYP	TBN
36	CATO (or IE)	

5. Additionally, invitations to attend will be extended to subject matter experts engaged in discrete S&EP work, such as Noise Induced Hearing Loss, Vibration at Work, Military Diving, Maritime, regulatory reform and other such issues that arise.

CHAPTER 8

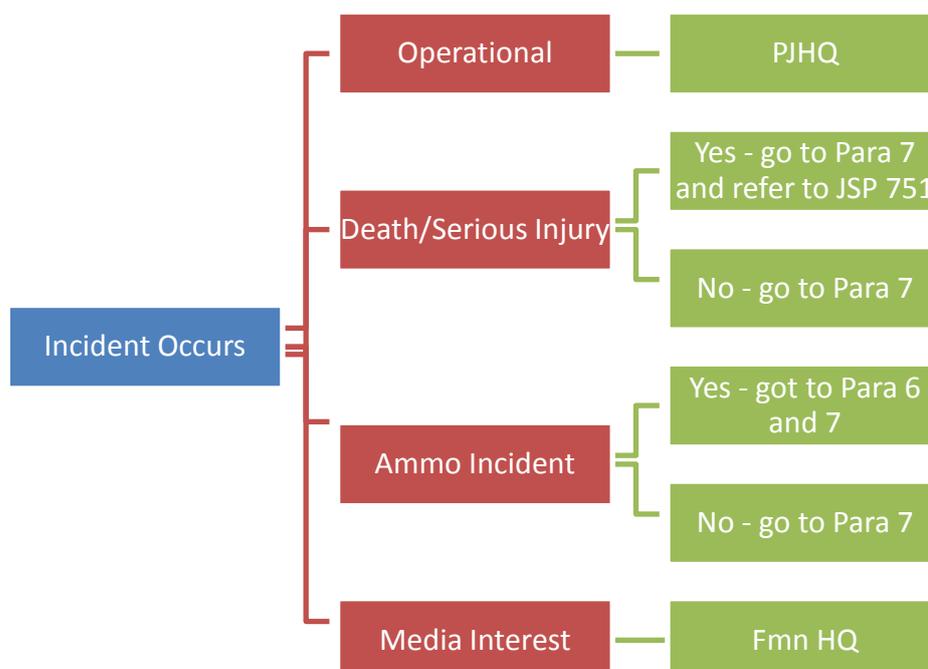
ARMY ACCIDENT AND INCIDENT REPORTING

Introduction

1. There are a number of actions that are required depending on the nature of the accident, incident, near miss, occupational ill health, serious equipment failure, ammunition incident (including FFE violations) and dangerous occurrence, including those involving fire and radiation hazard. An **incident** is defined as an unintended event not resulting in harm or damage - a near miss for example. An **accident** is an unintended event resulting in harm or damage. For clarity of language from this point on an incident refers to all activities listed above.
2. Where it is necessary to comply with the Joint Casualty and Compassionate Cell (JCCC) Policy and Procedures (JSP 751), there is no requirement to submit an additional notification¹. However, **all** other accidents and incidents are to be reported to the Army Incident Notification Cell (AINC) using the AF510 (as shown at Annex A to this Chapter) to the AINC group mailbox: Army LF-CESO-AINC-mailbox (MULTIUSER).
3. This reporting requirement applies to all Army personnel, including those commanded or administered by other TLBs, including all Reservists and Cadets when on duty. It extends to RN/RM, RAF and civilian personnel working in the Army TLB or when operating Land Systems equipment, (eg weapons and vehicles), members of visiting Armed Forces and anyone affected by Army activity, its property or estate. This includes the reporting of environmental incidents.
4. The reporting requirements and method of notification are to be repeated on Unit Orders at least quarterly and must be included in Exercise, Range and Training instructions.

Reporting Procedure

5. The diagram below explains the reporting procedure:



¹ AINC is linked into the Joint Casualty and Compassionate Cell (JCCC).

6. While, it may be necessary to comply with JCCC Policy and Procedures, as described in Para. 2, there are also other Defence/Army/Service policies and procedures directed at specific activity that need to be adhered to such as Infantry Training Vol 4, Pam 21, Range Conduct and Safety Rules (Army Code 71080) – these take priority in the first instant; after which an appropriate AF510 should be submitted to the AINC as at Para. 2.

7. All accidents and incidents (less for operational or JCCC), wherever they have occurred, are to be reported using the AF510 at Annex A to this Chapter. A unit involved in an incident whilst not in its own division or district, should report the matter to the division or district or garrison in which the incident occurred, as well as its parent division or district or formation. Units exercising overseas where the UK has a permanent military training facility² must ensure that the Comd of that location has also been informed. This can all be done using the same AF510 as submitted to the AINC.

8. The procedures to be followed for any accidents, near misses, occupational ill health, serious equipment failures and dangerous occurrences including those involving fire, involving contractors whilst on Army administered MOD land or property must be reported to the AINC. Contractors may also report the occurrence under their own reporting procedures to their employer.

9. AT, Expeditions and overseas activity instructions are to contain details of the accident reporting process. It is to be clearly stated that the AINC is to be notified in addition to any locally required arrangements.

10. All accidents, incidents, near misses and equipment failures³ must be reported to the AINC using the [Form 510](#) (it can also be downloaded from the CESO(A) intranet page on DII). The form must contain as much detail as possible and include any equipment being used at the time. The form is not to be amended in any way. Once completed, forms are to be sent to the AINC group mailbox. During non-office hours, routine matters should be referred to the AINC on the next available working day. All units are advised to retain completed copies of Form 510 for a period of 3 years in accordance with JSP 375, Part 2, Volume 1, Chapter 39.

11. The AINC can be contacted for advice or if there is any doubt as to whether an incident should be notified. Notifications can be made to AINC via:

a. Telephone. Mil: 96770 3661 or Civil: 030 6770 3661. This is a smart number and can be used for out of hours notification as well as during office hours.

b. Military e-mail. Via the Services DII network to [Army LF-CESO-AINC-mailbox \(MULTIUSER\)](#).

c. Civilian e-mail. Via the internet to: LF-CESOA-AINC-mailbox@mod.gov.UK

d. Fax. Where an electronic submission is not possible, using an AF510 to Mil: 94393 6889 or Civil: 01264 886889.

12. Following initial notification to AINC, units will receive an acknowledgement email from AINC containing a unique incident serial number and details of the incident as reported. This enables units to:

a. Verify that AINC has correctly recorded notified incident details.

b. Confirm unit ownership of incident.

² Currently BATSUB, BATUK and BATUS (2017).

³ See also DSA02.DLSR.LSSR: Land System Safety and Environmental Protection – Directive (Regulation 12) and DSA03.DLSR/LSSR: Land System Safety and Environmental Protection – Defence Codes of Practice (DCoP H) for Serious Equipment Failure reporting requirements.

c. When requested to do so, conduct a unit investigation⁴ (using the Unit Investigation Report – AF510A) and, if necessary provide a Learning Account⁵.

13. In addition to reporting incidents to AINC, all safety related deaths, serious injuries or significant losses of equipment capability are to be reported to Def AIB. The POCs for reporting are as follows:

a. Land domain: 03067 986587 – (manned 24/7). Follow-up email to: DSA-DAIB Land-Mailbox (MULTIUSER).

b. Maritime and Air domains: 03067 988276 – (manned 24/7). Follow-up email to: DSA-DAIB-Air-Mailbox (MULTIUSER).

14. In the event of an ammunition incident including FFE violations, the following are to be notified:

a. **UK.** Inform the Joint Services Explosive Ordnance Disposal Operations Centre (JSEODOC) Ammunition Incident Hotline, unless the civil police can confirm that they have already done so:

Didcot Mil: 94234 3360/3361/3362
Didcot Civ: 01235 513360/513361/513362
Fax Mil: 94234 3354 Civ: 01235 513354

b. **Germany:**

(1) During working hours.

(a) Range incidents. The unit is to inform Range Control of the location and range where the incident has occurred. Range Control will request ATO assistance from Bielefeld.

(b) Other incidents. Other incidents where ATO assistance is required should be requested through the local RMP Unit.

(2) Outside working hours. Contact the nearest RMP Unit and request ATO support.

c. **Rest of the World.** Units in Belize, Brunei, Canada, Cyprus and Falkland Islands are to report all ammunition accidents direct to their local ATO (or nearest RMP unit who will assist in contacting the ATO).

d. **Exercises abroad.** When an ATO is deployed with exercising troops, units are to report all ammunition accidents direct to the ATO. When no local ATO support is available, units are to report all ammunition accidents to the Ammunition Incident Hotline.

e. The AINC is to be informed in all cases using the AF510.

Investigation

15. The Management of Health & Safety at Work Regulations places a general duty on the MOD to record and investigate the immediate and underlying causes of all accidents/incidents to ensure that remedial action is taken, lessons are learned and longer-term preventative measures are introduced.

⁴ IAW JSP 375 Part 2, Vol 1, Chap 16.

⁵ A Learning Account may be requested if the incident is unusual or a CESO(A) priority through the CESO(A) Watch List.

16. The AF510A is part of the Army's Safe System of Work/Training (SSW/T) and forms part of the mandatory investigation process for Serious and certain Specified Incidents and is intended to 'handrail' units through an investigation. This form will be sent to the originator of the AF510 for all incidents that carry the caveats of Serious and Specified injuries. It should be completed and returned to the AINC for electronic upload within 5 working days of receipt. It is completed in the same way as the AF510 (Incident Notification) and the incident summary will already have been completed by the AINC. Therefore, the USEA, or their nominated representative, should complete the form.

17. The Def AIB, having been notified of an event, will assess whether an investigation is required by them. If so, a team will deploy normally within 24hrs (UK) or 48hrs (overseas). They will contact the unit to arrange administrative details and the format of the investigation. The Def AIB team are to be afforded full cooperation in the conduct of their duties.

18. Irrespective of a Def AIB investigation, CESO(A) may request a Unit Investigation Report (AF510A) as at Annex B to this Chapter and, if the incident is of particular importance, for the unit to produce a full Learning Account, the format for which is at Annex C to this Chapter. These may also be requested by other Army agencies such as APSG; however an AINC copy **must** be included in the submission.

19. All incidents involving ammunition will be investigated by ATO.

MOD Claims

20. From time to time claims may be raised against the MoD following an accident where injury or loss has occurred. There is a clear legal requirement to provide documentary evidence to support MoD/other Solicitors in reviewing these claims. Units are often approached for copies of documentary evidence by such solicitors. It is important to note that Units or Establishments **must not** accept any responsibility for processing an individual's claim, or say anything that might be construed as accepting, admitting or denying liability for the incident giving rise to the claim. Units should refer the requesting solicitor to the AINC as the POC for the release of such documentation as may be required. The AINC may have further follow up information not available to units. Information on the handling of claims is contained in 2016DIN06-011 – Guidance on Bringing a Common Law Claim for Compensation against MOD.

Promulgation

21. Contact details for AINC and the Def AIB POC must be included in all Exercise Instructions and Duty NCO, Officer, Staff Officer Folders etc.

New 510 and 510A yet to be published.

Please use current version until release date.

Intentionally blank

Intentionally blank

UNIT INVESTIGATION REPORT – AF510A

1. To facilitate better trend analysis into the root causes of accidents and incidents an AF510A has been introduced and is available on both MODNet and the AKX. This is part of the Army's Safe System of Training/Work (SST/SSOW) and forms a key element of the mandatory investigation process for Serious and certain Specified Incidents¹.
2. The AF510A will be sent to the originator of the AF510 for all incidents that carry the caveats of Serious and Specified injuries. It will be partly completed by the AINC, using the original incident AF 510, and the remainder should be completed and returned to the AINC for electronic upload within 5 working days of receipt. The AF 510A should ideally be completed by the Unit Safety and Environment Adviser (USEA), or their nominated representative, using a series of selectable sections each with a unique set of drop down menus. The form will expand as the information is entered in each section.
3. The Unit investigation should follow the following format:
 - a. **Overview.** A broad overview of the event; a summary of who, what, where, when and how. If there is a key issue then this should be mentioned here. Detail, such as names of individuals, grid references etc., is not required here. The last line is to indicate the number and type of casualties by category.
 - b. **Background.** This should include a short synopsis of the provenance of the task or activity. Specified conventions are to be followed for names of people, equipment, vehicles², locations³, grid references⁴, call signs⁵. Military terminology or jargon is to be minimised and cater for a mixed civilian/military readership – potentially a Coroner with little or no military experience. Footnotes are to be used to explain procedures and terminology in detail when it is thought necessary to provide illumination. Some of the factors that should be included here are:
 - (1) Detail of the area/location in which the incident took place.
 - (2) Include recent activity and leave dates as appropriate. Provide details that will indicate whether the personnel involved were suitably trained and qualified for the roles they took etc.
 - (3) Consider “risks” as widely as necessary – weather, terrain, equipment in use, level of supervision, adequate staff, and other factors.
 - (4) Any planning factors considered or briefings received by the body of personnel that were undertaking the activity. Identify any applicable policy.
 - (5) Include any other specialist agencies, such as Civil Police, in response to an RTA.

¹ JSP 375, Part 2, Vol 1, Chap 16 – Annex A.

² Put names of people, equipment and vehicles in BLOCK CAPITALS. Refer to serving personnel by rank then surname each time in full.

³ All location names are to be written in full the first time they are mentioned, in BLOCK CAPITALS, followed by their abbreviation.

⁴ Footnote grid references (GR) (do not place GR within the main body text).

⁵ If appropriate, suffix an individual's Call Sign (C/S) after they are mentioned for the first time eg Sgt NOMINAL (C/S 30A).

(6) Considerations would include factors such as duty patterns, training programme, fatigue, social considerations, relevant medical aspects and state of equipment in use.

- c. **What happened.** A description of the actions and decisions of the key players before, during and immediately after the incident. List events in chronological order and ensure that all known timings and dates are included. Details must be broken down logically and chronologically.
- d. **First Aid/medical arrangements.** This should outline in general the treatment delivered rather than a graphic description of the wounds.
- e. **Why the incident happened.** This is an opportunity to suggest why the event happened. The intent is to be objective and impartial. The purpose is not to apportion blame, but to highlight the contributory factors such as incorrect application of Tactics, Techniques and Procedures (TTPs) or an equipment failure.
- f. **Initial Issues Identified.** This part of the investigation process is to highlight what went wrong, what went right and any other information from which others might learn. However, units should refrain from making bold recommendations as these can be discussed with the Lessons desk and SMEs to ensure that they contain appropriate content for subsequent action or tasking.
- g. **Good Practice – Detail of Good Practice identified.** After all issues have been listed, any good practice that was noted, eg efficacy of PPE, should be listed using the format Observation – Discussion – Conclusion.
- h. **Immediate action taken to prevent recurrence.** This allows the unit and HQ to outline what activity they have taken, or will take, in seeking to avoid a recurrence. If the full circumstances of a recommendation have already been covered under the section above, simply note a title for the change and refer back to the relevant paragraph / sub-paragraph number. Immediate actions could include refresher training, adapting a TTP, changing the way a capability is used, distribution of literature as reminders, USUR submitted for new capability, additional resource bid (ARB) made and so on. It is equally valid to state that there is nothing that can be done to avoid recurrence,
- i. **Personnel.** A 'Personnel Involved' in the incident should be included as an annex as a table and the investigation report (AF510A) produced should be at the lowest Protective Marking commensurate with the contents; preferably OFFICIAL.

LEARNING ACCOUNT

1. The Learning Account allows detailed trend analysis to take place and provides recommendations to prevent a recurrence of the incident. Learning accounts should aim to investigate against the principles of the safe system of work/training, ie Safe: Person, Equipment, Practice and Place, and should make recommendations to prevent recurrence.
2. Learning Accounts are to conform to the format set out in ACSO 1118 for non-operational injuries and incidents. They may be requested by AINC as the third stage investigating process if the incident is unusual or of particular importance. This will be by an email to the Commanding Officer requesting that a Learning Account be raised. Additionally, Learning Accounts may be requested by other agencies such as Def AIB or Formation SO1s FP if additional information not gathered through an AF510A is deemed necessary.
3. All accidents and incidents should be investigated and the outcome of those investigations be sent to the AINC (and APSG and Def AIB as requested). However, there are occasions when no report from the unit is required, which are as follows:
 - a. Sporting injuries.
 - b. Operational injuries and incidents already covered by ACSO 1118 reporting requirements. Non-Battle Injuries and incidents may still require a Learning Account to be produced.
 - c. Those injuries categorised as minor unless directed by CESO(A).
4. CESO(A)/Army Lessons Process will use these as part of their information gathering exercise to inform themed CESO(A) Military Judgement Panel where the Army seeks to address the causes of incidents (3rd Loop Organizational learning), rather than the outcome of an incident (1st and 2nd Loop Organizational Learning).

ARMY INCIDENT NOTIFICATION CELL (AINC)

Role of the AINC

1. The AINC is the focal point for the notification and data collation of all Army incidents, accidents, near misses, occupational ill health, serious equipment failures and dangerous occurrences including those involving fire, world-wide. AINC maintains the Army's Incident Notification System (INS); the repository for all incident reporting (AF510) and subsequent documentation¹. It supports CESO(A) in carrying out its reporting requirements on behalf of the Army to the Defence Safety Authority (DSA) and UK statutory authorities, including the HSE and the Environment Agency (EA)².
2. The AINC is responsible for ensuring Army TLB's compliance with the statutory requirement for the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). Personnel deployed on Operations fall under the reporting requirements set by PJHQ/JFC and set out in mounting instructions where applicable. RIDDOR places a requirement for a death, major injury or dangerous occurrence being reported to the HSE as soon as possible. Any work-related injury resulting in over 7 consecutive days lost work time or incapacitation must also be reported within 15 days of the accident occurring/diagnosis. A RIDDOR submission may also be required for accidents and incidents that fall below the 7 day threshold, but are between 3 days and 7 days lost work time.
3. The data collated by the AINC provides a mechanism for trend analysis for use by the Chain of Command to identify areas of risk in order to improve safety performance. The MOD Claims Directorate also makes extensive use of the AINC database when handling and settling claims, as do the Service Personnel & Veterans Agency to validate claims by Service personnel in respect of the Armed Forces Compensation Scheme (AFCS).
4. AINC contact details are:

Address:	AINC, CESO(A), Army HQ, IDL 2, Blenheim Bldg, Marlborough Lines, Monxton Road, ANDOVER, Hampshire, SP11 8HJ
Email:	Army LF-CESO-AINC-mailbox (MULTIUSER)
Tel:	Mil: 94393 7645 / 7646 or Civil: 01264 887645 / 887646 Cadet Forces: Mil: 94393 7632 or Civil: 01264 887632
Fax:	Mil: 94393 6889 or Civil 01264 886889

¹ Such as AF510A, Learning Accounts, DAIB Triage reports, Service Inquiries etc.

² In cases of Fire, this is done by the Defence Fire Risk Management Organization (DFRMO) who also notifies AINC.

Definitions

5. JSP 375 Part 2 Volume 1 Chapter 16 ([here](#)) provides the following definitions:

Minor injury accident/incident	Any injury, accident/incident that results in up to seven days lost time and is not reportable under RIDDOR or causes minor damage.
Serious injury, accident/incident	Any injury, accident/incident that results in: <ol style="list-style-type: none"> 1) More than seven days lost time (or unable to perform full range of duties) requiring medical treatment but not admission to hospital. 2) Requiring a formal report to the HSE under RIDDOR and is not a specified injury, accident/incident or dangerous occurrence. 3) Failure or corruption of safety measure or procedure (eg broken or damaged device). 4) Localised spillage or leak of pollutant eg short-term damage to flora and fauna. (see JSP 418).
Specified Injuries	Any injury, accident/incident that results in: <ol style="list-style-type: none"> 1) A fracture, other than to fingers, thumbs and toes. 2) Amputation of an arm, hand, finger, thumb, leg, foot or toe. 3) Permanent loss of sight or reduction of sight. 4) Crush injuries leading to internal organ damage. 5) Serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs). 6) Scalpings (separation of the skin from the head) which requires hospital treatment. 7) Unconsciousness caused by head injury or asphyxia. 8) Any other injury arising from work in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.
Death	Any accident/incident that results in a fatality.

Dangerous occurrences	<p>Any incident that results in:</p> <ol style="list-style-type: none"> 1) The failure of any load-bearing part of any – <ul style="list-style-type: none"> • Lifting machinery etc. • Freight containers. 2) Any failure which has the potential to cause the death of any person relating to: <ul style="list-style-type: none"> • Pressure systems. • Electrical equipment/distribution systems. 3) Any accident/incident which resulted or could have resulted in the release or escape of a biological agent likely to cause severe human infection or illness. 4) Any unintentional fire, explosion or ignition involving explosives; or the unintentional discharge of a weapon. 5) Any incident in which breathing apparatus malfunctions while in use, or during testing immediately prior to use. 6) The complete or partial collapse of any scaffold which is more than 5 metres in height or erected over or adjacent to water. 7) The accidental release or escape of any substance in a quantity sufficient to cause the death, specified injury or any other damage to the health of any person. 8) An explosion or fire occurring in any plant or premises which results in the stoppage of that plant or as the case may be the suspension of normal work in those premises for more than 24 hours, where the explosion or fire was due to the ignition of any material. 9) Total loss of system or facility for 24 hours or greater.
	<p>THIS IS NOT A DEFINITIVE LIST – FOR FULL DETAILS OF DANGEROUS OCCURRENCES PLEASE REFER TO: HSE Reportable Incidents Web-Page.</p>
Near Miss	<p>An event that, while not causing harm, had the potential to cause injury, ill health or damage but not a RIDDOR reportable Dangerous Occurrence.</p>
Diseases	<p>Diseases reportable to the HSE under RIDDOR include:</p> <ol style="list-style-type: none"> 1) Carpel tunnel syndrome. 2) Severe cramp of the hand or forearm. 3) Occupational dermatitis. 4) Hand-arm vibration syndrome. 5) Occupational asthma. 6) Tendonitis or tenosynovitis of the hand or forearm. 7) Any occupational cancer. 8) Any disease attributed to an occupational exposure to a biological agent. <p>Note: Certain occupational diseases must be reported, where these are likely to have been caused or made worse by their work.</p>

CHAPTER 9

PLAN, DO, CHECK, ACT METHODOLOGY

1. The HSE's Plan, Do, Check, Act model balances the systems and behavioural aspects of Health and Safety leadership and management. It encourages approaching Health and Safety management as an integral part of good management and leadership generally, rather than as a stand-alone system. Widely used as an industry standard, it can be adapted to the full spectrum of Army activity.

Plan

- Identify and communicate what is to be achieved in terms of HS&EP, who will be responsible for what, how aims will be achieved and how success will be measured. Capturing this in a policy and having a plan to deliver it will reduce ambiguity and ensure intent is clear.
- Decide how performance will be measured in the AoR. Consider ways to do this that go beyond looking at accident figures – looking at leading as well as lagging indicators. These are also called [active and reactive indicators](#).
- Consider fire and other emergencies. Co-operate with anyone who shares the workplace and ensure plans are co-ordinated.
- Plan for changes and identify any specific requirements that apply.

Do

- Identify HS&EP risk profile:
 - Conduct Risk Assessments, identify what could cause harm in the workplace, who it could harm and how, and what needs to be done to manage the risk.
 - Identify the priorities and identify the biggest risks.
- Organise activities to deliver HS&EP plans. In particular, aim to:
 - Involve all levels in the chain of command and communicate so that everyone is clear on HS&EP intent and their role in your plan.
 - Foster and develop positive attitudes and behaviours – a strong and just Safety Culture is critical.
 - Provide adequate resources, including competent advice where needed.
- Implement the plan:
 - Decide on the preventive and protective measures needed and put them in place.
 - Provide the right tools and equipment to do the job and keep them maintained.
 - Train and instruct, to ensure everyone is competent to carry out their work.
 - Supervise to make sure that arrangements are followed.
 - Demand HS&EP rigour from the chain of command – they are the eyes and ears for dynamic risk assessment on the ground and must demonstrate leadership in following your intent.

Check

- Measure performance:
 - Make sure that plans have been implemented, 'paperwork' on its own is not a good performance indicator.
 - Assess how well the risks are being controlled and if aims are being achieved. A robust audit regime (iaw ACSO 9001) is strongly recommended.
 - Adopt a 'healthy paranoia' about HS&EP and resist the urge to believe comforting assurances without checking.
- Investigate the causes of accidents, incidents or near misses:

- The Defence Accident Investigation Branch (Def AIB) will investigate all serious accidents, incidents and near misses.
- APSG and CESO(A) may request Learning Accounts for specific accidents, incidents and near misses.
- Formations and units are recommended to conduct their own Learning process for HS&EP events that do not meet the Defence AIB or APSG/CESO(A) thresholds but from which local lessons can be learned and preventative measures applied.

Act

- Review performance:
 - Learn from accidents and incidents, ill-health data, errors and relevant experience, including from other Organizations.
 - Regularly revisit plans, policy documents and risk assessments to see if they need updating.
 - Encourage and teach dynamic Risk Assessment requirements and methods.
- Take action on lessons learned, including those from audit and inspection reports.