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**LFSO
3216
(TENTH REVISE)**

**LAND FORCES
STANDING ORDER NO 3216**

by

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Commander Land Forces

**THE ORGANISATION AND ARRANGEMENTS FOR THE MANAGEMENT OF
SAFETY AND ENVIRONMENTAL PROTECTION IN LAND FORCES**

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LAND FORCES STANDING ORDER NO 3216 (TENTH REVISE)

THE ORGANISATION AND ARRANGEMENTS FOR THE MANAGEMENT OF HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION IN LAND FORCES

INTRODUCTION

1. Health and Safety can be defined as the organised efforts and procedures for identifying workplace hazards and reducing accidents and exposure to harmful situations and substances. It includes training of personnel in accident prevention, accident response, emergency preparedness and the use of appropriate protective clothing and equipment. It also encompasses occupational health.¹ Across the Army this is addressed in conjunction with Environmental Protection and Fire Prevention, and is generally referred to as Health, Safety and Environmental Protection² (HS&EP). Safety assurance is further enhanced by the introduction of Duty Holding (DH), a policy that provides additional assurance above and beyond that which currently exists³.
2. Responsibility for safety matters within Defence rests ultimately with the Secretary of State for Defence. In turn, the Secretary of State for Defence delegates to PUS the duty of ensuring that effective management and compliance arrangements are in place. Through a system of policy, standards, regulation and work practices, safety performance is reviewed and then briefed to the Defence Board. Safety Regulation is discharged by the Military Aviation Authority (MAA), which covers all aspects of military aviation, and the Defence Safety and Environmental Authority (DSEA)⁴ which covers all aspects of safety and environmental protection policy and regulation outside aviation. Health and Safety at Work is regulated by the Health and Safety Executive (HSE) and by the Environmental Agency (EA) for environmental matters.
3. Every employer is required, in accordance with the Health and Safety at Work Etc. Act (1974), to publish a Policy that includes Organisation and Arrangements (O&A) for the management of HS&EP. The Secretary of State for Defence's policy statement, sets out the context for the MOD⁵, a copy of which can be located [here](#). The management of HS&EP is based on the model Plan, Do, Check, Act set out in Health and Safety Guidance as shown in Figure 1.

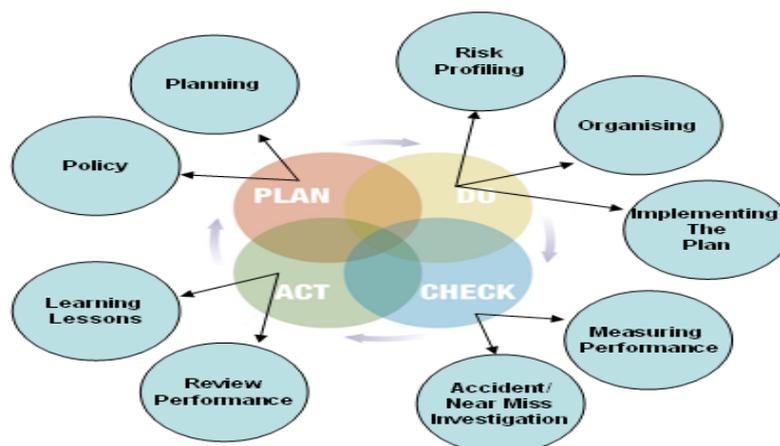


Figure 1. The HSE Model – Plan, Do, Check, Act.

¹ Occupational Health (OH) is a cross disciplinary area concerned with protecting the safety, health and welfare of people engaged in work or employment. The lead for OH within the Army is the Army Medical Services (AMS).

² Policy for fire prevention is generated by DFRMO.

³ Due to the rapid development of concepts around DH it is envisaged that this LFSO will require updating within 12-18 months.

⁴ These combine to form the Defence Safety Authority (DSA) wef 1 Apr 15.

⁵ JSP 815 Part 1, Annex A.

4. **Environmental Protection (EP).** Responsibility for a large component of EP sits with the Defence Infrastructure Organisation (DIO) as infrastructure providers and maintainers. All TLBs have a responsibility to ensure that practices and procedures are EP-compliant and that any incident is managed by well established and rehearsed procedures⁶. The Army has its own Environment Management System (EMSAS) for use by units to ensure that their environmental aspects and impacts are assessed, prioritised and managed by the Plan – Do – Check – Act cycle.

MISSION

5. Commanders are to put in place and maintain organisations and arrangements that allow the safe conduct of activities and protection for the environment, in accordance with legislation and policy, in order to minimise the risk of death and injury to Army personnel, civilian employees, contractors, members of the public, visitors to Army sites, users of land systems equipment, and to prevent damage to the environment.

EXECUTION

6. Concept of Operations

a. **Intent.** To ensure that legislation can be complied with and overarching Defence policy objectives can be met. It is essential that structures exist within all formations and units that allow for comprehensive management of health, safety and environmental risks. Commanders are to understand their obligations in law, to provide clear direction and appropriate supervision to meet those obligations and to ensure that all personnel understand their own personal commitment within the law for duty of care. Additionally, the concept of DH will be applied to all Army Risk to Life (RtL) activities, thereby strengthening safety structures by providing additional assurance.

b. **Scheme of Manoeuvre.** All commanders are to foster a positive safety and environmental culture within their organisations that:

- (1) Controls risk.
- (2) Secures co-operation between individuals, including visitors and contractors, sub-units and units and others affected by their actions.
- (3) Ensures clear communication within their organisations.
- (4) Provides sufficient competent⁷ individuals to support the safety and environmental structure.

c. Risk management is the key method for understanding and controlling risk and must be carried out scrupulously. Appropriate deductions from risk assessments must be drawn and mitigation measures put in place to reduce risk to As Low As Reasonably Practicable (ALARP). Where risk cannot be reduced to ALARP commanders are to elevate their concerns within the Chain of Command to the appropriate DH level. Commanders are to ensure that their subordinates operate a Safe System of Work⁸ that is underpinned by safe facilities, safe equipment, safe processes, competent people, suitable training and supervision. Accidents will happen, but their frequency and impact can be diminished by honest reporting, thorough analysis of the root cause, and generation of appropriate lessons that are widely disseminated and remedial measures put in place to prevent recurrence.

d. **Main Effort.** This must be with the identification of risk and the identification and implementation of control measures that keep the risks ALARP.

⁶ Within the Army Sustainable Development (SD) is grouped with Environmental Protection for management purposes. Direction on SD is contained in LFSO 1125 and JSP 418 for Environmental Protection.

⁷ A competent person is deemed competent by virtue of qualifications, currency, experience and maturity.

⁸ Safe Place, Safe Person, Safe Equipment, Safe Procedure. A full explanation is shown in Annex G to this document.

TASK ORG

7. **Leadership.** Leadership in HS&EP will be delivered from the top. ECAB, as the TLB Management Board, in concert with the Army Command Group are the bodies which will deliver this leadership. Command Groups⁹ (CG) will fulfil the roles set out by the Institute of Directors (IOD) and the HSE guidance “Leading Health and Safety at Work”, the fundamentals of which are set out at Annex A. Every HLB, iHLB and BLB CG will consider HS&EP in the fashion set out in Annex A.

8. **Control.** Control is achieved by commanders at all levels, understanding that they are responsible for managing risk for those employed under their command and other stakeholders, such as visitors and contractors. Responsibilities should be set out by the following means:

- Commanders are to have responsibilities for HS&EP included in their job description.
- Commanders’ appraisals will include the opportunity to comment on their safety management.
- Serious breaches of safety will be acted upon.
- Good safety performance will be officially recognised.

9. **Organisation.** CESO(A) provides safety policy and advice for both the Supported and Supporting Commands. Safety Advisors have been established at 2* Formation level. The Army Headquarters (AHQ) structure is shown at Figure 2.

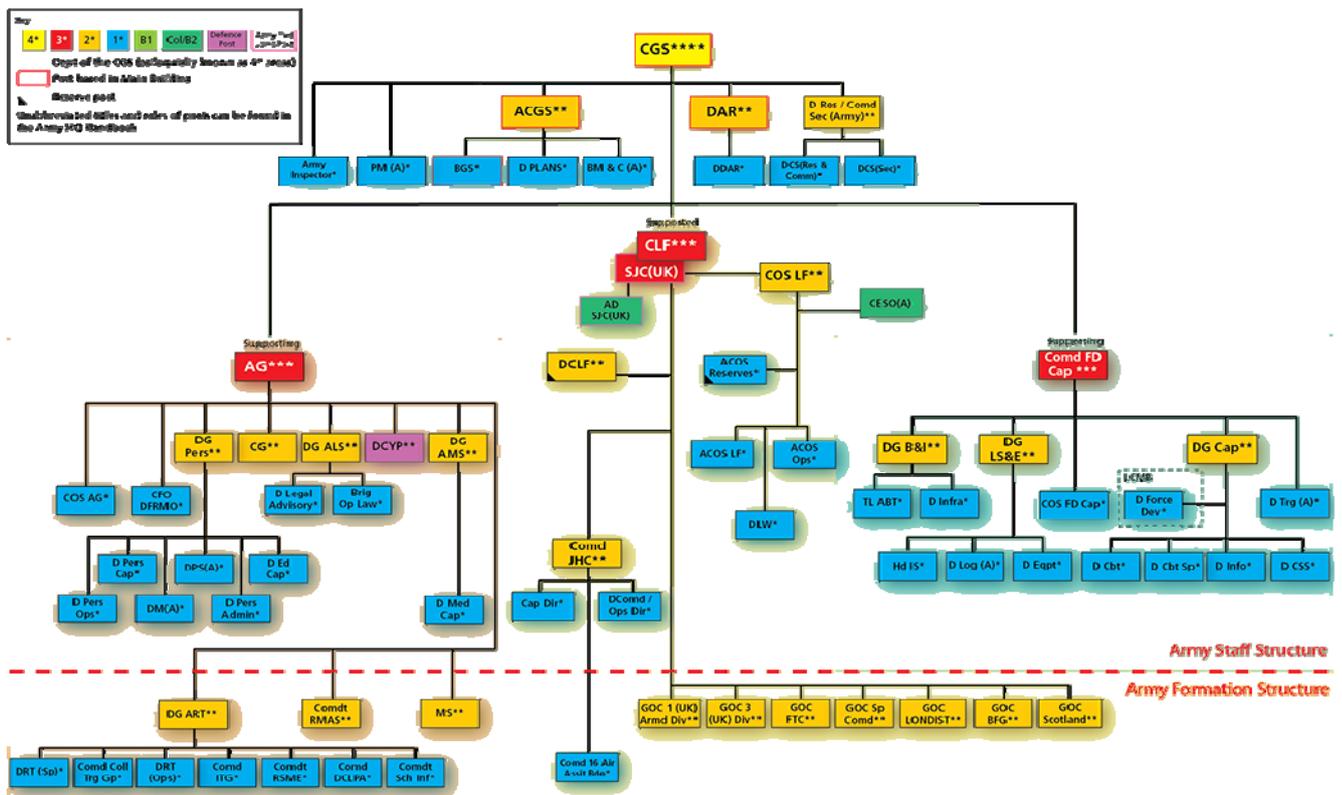


Figure 2. AHQ Structure.

10. The HS&EP structure in support of the firm base is shown in Figure 3 below.

⁹ LF, FD & Cap and AG.

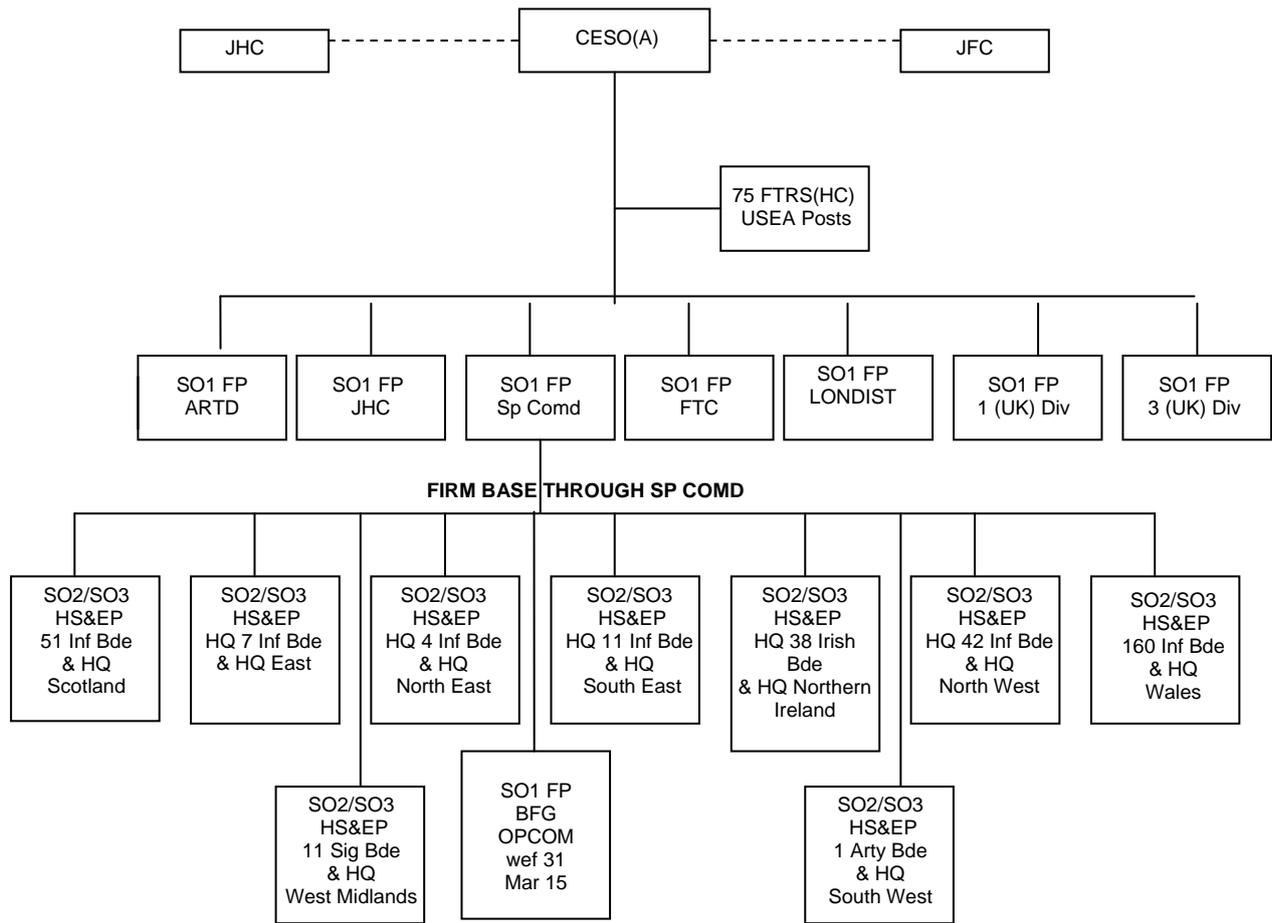


Figure 3. Firm Base HS&EP Support.

TASKS

11. **CLF.** CLF retains the pivotal position for safety as the Commander who sets the overall direction and objectives, as well as allocating the resources to achieve the desired output.

12. **COS LF.** COS LF is:

- a. The Army Safety, EP and SD process owner.
- b. The Command's representative on the Defence Environment and Safety Committee (DESC).

13. **Commanders**¹⁰. HS&EP objectives are to be regarded in the same way as other mainstream objectives. Sensible and proportionate risk assessment is to be conducted at all levels; analysis of RtL activities falls under the aegis of DH. This risk assessment process must be supported by strong and active leadership in HS&EP from commanders at all levels. Ultimately it is commanders who decide on the activity, its execution and have control of the personnel. The table below sets out commanders' obligations:

¹⁰ Commanders need to: foster a positive safety culture through the emphasis of Force Protection; minimise fatalities and injury and ensure accidents, incidents and near misses are reported promptly; conduct and act on risk assessments, elevating risk up the Chain of Command where applicable.

Task	Conducted By
Appoint a Safety Champion to the Formation Management/Command Board. COS or DCOS or an officer of similar status is to be appointed the Board's Champion for HS&EP and SD. In areas where a COS or DCOS is not appropriate (e.g. BFG) then the Commander should appoint a suitable Champion at least of OF5.	Fmn
Establish a Safety Committee¹¹. CO/HoEs are to ensure that the unit HS&EP committee meets on a regular basis and chair the meeting at least once per year as a minimum.	CGs, Fmn, Unit, Sub Unit
Ensure that subordinate Commanders' job specifications set out their responsibilities for safety.	Fmn, Unit, Sub Unit
Publish signed and dated O&A¹². Unit O&A must include the following: <ul style="list-style-type: none"> a. Reference to the extant Secretary of State for Defence's Policy Statement. b. A reflection of the personal commitment of the CO. c. The personal commitment to safety of his immediate command chain, and subordinate command chains. d. The requirement for the prevention of harm, injury, loss and ill-health that are based on the systematic identification of significant health and safety/fire hazards through detailed risk assessment. e. The arrangements for providing Control, Coordination, Cooperation and Communication (4Cs) for lodger units, contractors and visitors in accordance with LFSO 4600. 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. 	Unit
Ensure that safety performance measurement and review occurs and that its review is conducted in detail at Safety Committee level.	CESO(A), Fmn, Unit
Ensure that all adverse events¹³ are reported to the Army Incident Notification Cell (AINC).	Fmn, Unit, Establishment
Take positive steps to reduce RtL arising from HS&EP failings , and reduce injuries in accordance with targets set out in Defence and Army Plans.	Fmn, Unit
Pursue a discipline and rewards policy that takes disciplinary or administrative action over poor safety practices, but rewards good safety practice by means of Formation Commanders' commendations and other reward or official recognition mechanisms.	Fmn, Unit
Appoint a Unit Safety and Environmental Advisor from within their own establishment, normally, but not limited, to the Quartermaster, who must be trained through attendance on an All Arms Unit Safety Advisor Course or equivalent ¹⁴ . This requirement is mandated even where CESO(A) has appointed a FTRS(HC) Unit Safety and Environmental Advisor (USEA) to that unit.	CESO(A), Unit
Ensure that their personnel, whether military or civilian, are consulted over safety through Site Safety Meetings.	Fmn, Unit

¹¹ In Army HQ this function will be fulfilled for CLF through the Army Environment and Safety Working Group (AESWG).

¹² In the Army, this remit is met by this LFSO.

¹³ Adverse events are defined as any accident, incident, dangerous occurrence, occupational ill health, occupational disease or near miss set out in Annex B.

¹⁴ This includes the Safety Advisors Course held at the REME Arms School.

14. **Overseas Commanders.** In addition to the obligations set out above, commanders in overseas locations are, so far as is reasonably practicable, to agree and publish a single cohesive command level HS&EP management system that draws together UK and Host Nation requirements for compliance by all employees of the command, irrespective of their TLB or budgetary status. In Germany it is the responsibility of HQ BFG to agree, define and publish this system and to provide theatre-wide HS&EP support to all units under its administrative control.

15. **All Ranks/All Personnel.** All military personnel, civilian employees, contractors and visitors are to take reasonable care of their own safety. Individuals are also to take reasonable care of others who may be affected by their acts or omissions at work. The reckless neglect of safety by anyone is unacceptable. Each individual is to report any accident, near miss, serious equipment failures or unsafe practice through their Chain of Command, dependent on the nature of the incident, in accordance with Annex B

16. **Chief Environment and Safety Officer (Army) (CESO(A)).** CESO(A) is to provide specialist safety advice and is to assist commanders in establishing good safety management systems throughout the Army. Additionally, CESO(A) is to:

- a. Design, maintain and exploit the Army DH policy.
- b. Chair and provide the secretariat for the Army Environment and Safety Working Group (AESWG), and oversee the work of its subordinate committees. The Terms of Reference are at Annex C.
- c. Act as the Occupational Health¹⁵ and Safety, EP and SD policy link with MOD Centre to provide advice to senior officers on safety matters across the Army.
- d. Monitor, review and audit health and safety arrangements throughout the Army including the recruitment and retention of dedicated USEA under the FTRS(HC) scheme.
- e. Disseminate and offer guidance on annual action plans that set targets and objectives in line with those set by JSP 815.
- f. Prepare the annual TLB report in line with the MOD Goals and Objectives on behalf of CGS and record any evidence of significant failure to discharge the TLB's Safety responsibilities.
- g. Promulgate HS&EP policy, including radiation policy, and provide appropriate and timely advice.
- h. Administer the Land Accident Prevention and Investigation Team (LAIT)¹⁶.
- i. Provide a contact centre for processing information relating to Army accidents, incidents, serious equipment failures and near misses. This contact centre is also to act as the single focal point for the reporting of Land Systems¹⁷ equipment across all Front Line Commands and TLBs.
- j. Maintain a capability to deploy, when requested by PJHQ, to provide appropriate operational safety advice to Commanders on joint operations.

¹⁵ In conjunction with AMS.

¹⁶ Until transfer to DSA in Apr 15.

¹⁷ Land Systems is defined as any system designed for and operated in the Land Domain (JSP 454 Part 1 Version 6 refers).

- k. Act as the interlocutor on behalf of the Army to establish mutual protocols with the HSE, the EA, internal Defence Regulators and other agencies as appropriate, within the general frameworks of agreements between the MOD and these bodies.
- l. Provide a mechanism for the production, tracking and resolution of operating Lessons identified in accordance with the Land Environment Lessons Process (LELP) set out in LFSO 1118.
- m. Provide a mechanism for the production of routine statistical analysis for use at CGs. Act as the focal point for the release of all statistical information from the AINC database including Freedom Of Information (FOI) and Ad Hoc requests.
- n. Staff recommendations passed to the Army from DSA Service Inquires (SI) from Apr 15.

17. **LAIT.** LAIT is to investigate and report, at the earliest opportunity, the circumstances and causes of all accidents and incidents in the land environment or where Land Forces sponsored equipment is involved, which cause, or have the potential to cause death, injury or equipment loss, as directed by Chief LAIT (Ch LAIT) on behalf of COS LF¹⁸. LAIT will consequently make recommendations as soon as possible to ensure appropriate remedial action is taken to reduce the risk of recurrence. LAIT deploys to both operational and non-operational accidents and incidents and are required to be at the scene within 24 hours of notification within Europe and 48 hours worldwide.

18. **Chief Engineer (Army) (CE(A)).** The CE(A) is the Army's engineering safety focus. The CE(A) is the principal advisor to all stakeholders on all technical engineering issues and equipment matters. As part of his role, he is to Chair the Land Systems Safety Working Group (LSSWG) and the Army Engineering Committee.

COORDINATING INSTRUCTIONS

19. **Assurance.** Assurance is a positive declaration of conformity to a set standard. It is about providing confirmation that activity takes places in accordance with the regulations and policies which apply to that standard. The statutory¹⁹, regulatory and policy environment in which the Army lives, trains and operates has become increasingly demanding, as has the amount and rigour of external scrutiny. Commanders at all levels in the Army will wish to know that their organisations have, in achieving the objectives set, done so in compliance with the regulations and policies relevant to those objectives. Put simply: ***'that the Army does the right things and does them properly'***. The Army needs an effective and efficient assurance framework in order to provide commanders with this degree of confidence and compliance.

20. The Army's Assurance **Framework**²⁰ consists of the following components:

- a. **Principles**, underpinning assurance in the Army.
- b. A **model** for how assurance works across the Army.
- c. Defined **roles** within the Chain of Command and elsewhere, delivering assurance across the Army.
- d. A **mechanism** composed of processes delivering assurance in the Army.

¹⁸ On behalf of DG DSA wef 1 Apr 15.

¹⁹ Statutes are laws by which the MOD and Army has to abide unless specifically exempted. Internal rules or policy may be set or changed by the MOD and/or Army within the framework of general law.

²⁰ Army Inspectorate - The Army Assurance Framework dated 30 May 14.

21. The governance of activities across the Army is based on a dynamic relationship between:
- a. **Commanders** who **decide** how to deliver the objectives that have been set taking account of their training and operational imperatives, together with the risks they intend to take in delivering their objectives; and,
 - b. A range of **Proponents** and **Competent Advisors**, usually within AG and FD & Cap commands, who provide commanders with functional advice about the specific activities conducted while delivering their objectives. An element of this advice will be a recommended assurance regime so that commanders can then seek confirmation that the activity has been undertaken according to the appropriate criteria²¹ set for that activity.
22. This structure reflects the fact that the Army comprises of two main operating elements – Land Forces and the Recruiting & Training Division – responsible for delivering the Army’s principal outputs. Competent Advisors and Inspectorates are usually appointed from within AG and FD & Cap to lead on policy, standards and assurance for specific functional areas. By this means command-led outputs are supported by proponents who are usually outwith the delivery Chain of Command, thereby separating policy and assurance from the operational Chain of Command.
23. Apart from the Chain of Command, others in the Army have key roles in the Army’s assurance model. The Army Inspector works directly for CGS to provide ECAB with an independent view of the Army’s compliance with the applicable statutes and regulations. The link with the Competent Advisors (who provide formal reports to the Army Inspector) is through the Army Assurance Working Group and periodic Army Competent Authority & Inspector (ACA&I) reports. He also engages with the Chain of Command through the conduct of inspections so is well placed to detect issues across the Army. The Army Inspector reports verbally to each meeting of ECAB and in written form twice a year. The Army Independent Assurance Committee provides additional challenge and tension within the Army’s assurance model. There are also a range of external bodies with statutory responsibilities for specific functions to examine the Army’s compliance.
24. The assurance mechanism consists of multiple events and activities that provide the body of evidence of compliance with the relevant regulations, policies and standards. Collectively these include (but are not limited to): inspections, audits, evaluations, management checks, Reports and Returns (R2) and advisory visits.
25. Assurance provides the evidence to satisfy three key criteria:
- a. that the Army’s activities are appropriately compliant with existing statutory and regulatory requirements;
 - b. that those activities are consistent with the covenant the Army has with its people; and
 - c. that the Army is demonstrably rigorous and effective in self-regulation.
26. Following the Haddon-Cave report²² the Army introduced the concept of DH to specific appointments in the Chain of Command in order to manage the specific responsibilities for the safe conduct of activities constituting a RtL. As part of the assurance mechanism, evidence is collected and assessed to provide an indication of Duty Holders’ understanding of their responsibilities and whether they are reducing RtL associated with their activities to ALARP.

²¹ The criteria include the law, regulations, best practice, operational requirement and the military covenant - i.e. the “standard”.

²² The Haddon-Cave report into the crash of Nimrod XV 230 – dated 28 Oct 09.

27. Information obtained during assurance activity provides the evidence to support the Holding to Account (H2A) process. It also gives confirmation that Duty Holders across the Army are managing their RtL activities in compliance with the appropriate regulations and policies. It allows empowered commanders to be accountable for discharging their responsibilities satisfactorily.

28. **Duty Holding.** A key requirement falling out of the Haddon-Cave report was a need to 'clearly identify, and mark out, the senior Duty Holders that have both the authority and *legal* responsibility with respect to the operation of military equipment'. It requires operators (users) to ensure:

- a. The safe operation of the equipment.
- b. The safety of their personnel operating or using the equipment.
- c. The safety of the activities which those personnel are required to undertake using the equipment.

29. This methodology is to be applied within the Army in a tiered construct that is appropriate and beneficial to what we do. It will apply to a limited number of levels within the Chain of Command that direct activities with RtL. It provides for better management of risk and allows for elevation of risk for consideration by a higher level Duty Holder when circumstances warrant this. Full details are contained in Annex D.

30. **Capability Directorates (CD).** A top-level capability management model has been developed in the context of the Army Operating Model (AOM), which identifies the functional responsibilities of the key players. Within the model, Director General Capability (DG Cap) leads capability management for the Land environment on behalf of CGS and is responsible for capability planning and integration of delivery across the Defence Lines of Development (DLoD). The detailed roles, responsibilities for the CD are set out in Annex E. The management of risk and the Risk Referral process is set out in Annex F.

31. The model sees CD planning capability and requirement setting using information provided by DLoD. Advice and programme detail is provided by the supporting DLoD organisations. CD will also integrate across DLoDs to deliver capability into service, and ensure coherent capability is maintained once in service. A crucial safety function fulfilled by the CD is that of ownership of the Part 3 Safety Case (SC). In this capacity they ultimately are the body who advise the Chain of Command on the safe use of equipment and the safe conduct of activities.

32. **Competence.** Competence is achieved by ensuring that all ranks, commensurate with the task, are qualified, current, experienced and mature, and that they are appropriately supervised. Specific HS&EP and equipment focussed training is to be carried out as follows:

a. **Practitioners.**

(1) CESO(A) and designated staff, including SO1 HS&EP at 2* Formation Command level, where possible, are to be qualified to Diploma Level 6 in Occupational Safety and Health.

(2) CE(A) and Engineering Standards, Safety and Assurance staff and appointed ACA&I safety posts within CDs are to be qualified at minimum NEBOSH General Certificate in OSH Level 3 H&S (NGC OSH 3) and where possible, to Diploma Level 6.

b. **CD Staff.** Equipment Capability staff officers who attend Safety Panels (SP) as the CD representative, together with those that provide policy, direction or advice that allows the Part 3 SC to be completed are to undertake the following training courses:

- (1). The Army Equipment Safety Training for CD Staff (online via DLP/DVLE). The link to the online course is [here](#). This is the minimum level to be achieved by ADs.
- (2). System Safety in Action (completed online plus attendance at a workshop). This course incorporates the System Safety Awareness training which is no longer required.
- (3). Where a greater understanding of the acquisition process is required²³ then those personnel should attend the System Safety Process Management (completed online plus attendance at a workshop). Typically this will include CD Staff Officers attending in-service safety panels/safety committees, Capability Integration Working Groups and Availability Working Groups.

33. At unit level, in the absence of a dedicated USEA, appointed practitioners are to be qualified as soon as possible on appointment at the All Arms Unit Safety Advisers Course. Dedicated USEA appointed by CESO(A), will be trained to NGC OSH Level 3 as a minimum on selection for the post.

34. Training for personnel on non-specialist posts is to be conducted as follows:

a. **Army.**

- (1) All Army personnel will undergo the Workplace Induction Package (WIP) on joining and then every three years and other safety training as decided by COs.
- (2) All soldiers selected for promotion to SNCO will undergo CLM Safety Management.
- (3) All Officers will undergo safety training as part of the appropriate career development courses and employment training.

b. **Civil Service.** All Civil Service Line Managers are to carry out DB Learning HS&EP packages in accordance with MOD Civil Service requirements.

c. **Other Services.** RAF and RN personnel under OPCOM, OPCON or ADCON will conform to their Single Service training standards. Where these are deficient in any way compared with the Army system, instances are to be reported to CESO(A).

35. **Safe System of Work and Training (SSW/SST).** The application of the SSW/SST is to be adopted for all tasks and activities. Full details of the requirements for meeting the SSW/SST are contained in Annex G.

36. **Performance Measurement And Review.** Performance can only be judged after baselining current performance through accurate reporting and auditing.

37. At every level, the measurement of safety performance is to take place. This is to take the form of both active and reactive measurement. Active systems will include auditing, inspection and measuring. Reactive systems include accident investigation and statistical measurement and analysis. Both are critical for the identification and measurement of risk. The aims of performance measurement are to:

- a. Determine whether regulations and policy requirements are being adhered to.
- b. Confirm that control measures have been implemented and are effective.
- c. Learn from good practice, failures and hazardous events.

²³ These will be the designated Safety Critical posts identified by each CD and Eqpt Dir.

d. Provide information to support continuous improvement of the Safety and Environmental Management Systems.

38. CESO(A) has an arrangement with the Defence Strategic Statistics-Health (Def Stats) for the reporting of accidents at every level to be drawn into statistical reports. These reports will be distributed, initially down to 2* level, and will allow Boards to measure their safety performance. Where possible, every CG meeting will review performance on the basis of the active and reactive measures described above. Statistics not approved by Def Stats are not to be used in submissions or presentations without referral to CESO(A).

39. Audit is an essential part of the Safety and Environmental Management System and is the structured process of collecting independent information on the efficiency, effectiveness and reliability of the total environment and safety management system and drawing up plans for corrective action. Within the Army, planned audit and review is to be conducted using appropriate methodology by competent auditors. Formations and units are audited for HS&EP compliance regularly in accordance with this instruction and under Sp Comd arrangements. Direction on audits is set out in Annex H.

COMMUNICATION

40. **Consultation and Cooperation.** A system for consultation and cooperation is to be adopted across the Army in the form of Workplace Safety Meetings, which should inform Unit Safety Committee Meetings, which in turn feed into CG meetings. Units should aim, at sub-unit level, to meet in the workplace (tank park, vehicle hangar, AFV garages) and discuss safety questions and concerns relating to both in barracks activity and that conducted in the field. Furthermore, during debriefs and After Action Reviews (AARs) following exercises, units are to consider safety issues which arose during training, and ways of addressing them. These issues are then to be brought to the attention of the Chain of Command as set out above, or dealt with at unit level.

41. **Vertical Communication.** Communication is to be achieved down the Chain of Command at 'Board' level briefings. Safety must be a standing agenda item. This agenda item should be used to promulgate key safety issues that have been identified via mainstream Army communication media, including Army Safety News and safety bulletins published either by CESO(A) or by COS LF. Furthermore, safety reporting is to be included in performance reporting in accordance with the Army Plan.

42. **Lateral Communication.** It is essential that safety lessons learned are communicated around the MOD and across the Army. This is achieved through the LELP. This will be a key function of the Land Environment Lessons Working Group (LELWG).

T RADFORD OBE
Maj Gen
for CLF

Annexes:

- A. IOD/HSE Guidance 'Leading Health and Safety at Work', Command Group Level Leadership in HS&EP.
- B. Accident and Incident Management.
- C. Terms of Reference for the Army Environmental Safety Working Group.
- D. Army Duty Holding.
- E. Capability Directorates.
- F. Dispensation and Army Risk Referral Process.
- G. Safe System of Training.
- H. HS&EP Audit Directive.

IOD/HSE GUIDANCE 'LEADING HEALTH AND SAFETY AT WORK', COMMAND GROUP LEVEL LEADERSHIP IN HS&EP

1. It is expected that as a minimum, Formation level Command Groups across the Army – those which have the governance duties required of the TLB, HLB, iHLB and BLBs – are to conduct their management of HS&EP by carrying out the functions set out below. The original document called 'Leading Health and Safety at work' and encoded INDG417, from which this is extracted, can be accessed on the HSE website (www.hse.gov.uk).

2. Planning the Direction for HS&EP.

- a. The Commander and all members of the Command Group will own and champion HS&EP performance across the Command.
- b. Each Command Group should have HS&EP as a regular agenda item. Command Groups are to take ownership of health and safety to ensure that HS&EP arrangements are captured in an Organisational Safety Assessment (OSA)²⁴, are adequately resourced, contain competent advisors and that the appropriate risk assessments are being carried out.
- c. The Command Group will receive regular reports on safety from the Command Group's appointed Safety Adviser and through the provision of statistics under CESO(A) arrangements. Command Groups should also review audit reports via Army Reporting Management System (ARMS). Access to ARMS can be gained through SO1 Audit CESO(A).
- d. The Command Group will set SMART (Specific, Measurable, Achievable, Realistic and Time-framed) targets and actions and approve annual action plans.
- e. COS or DCOS or an officer of similar status is to be appointed the Command Group's champion for HS&EP. In areas where a COS or DCOS is not appropriate (eg BFG) then the Commander should appoint a suitable champion at least of OF5.

3. Delivering HS&EP.

- a. The Command Group will take every opportunity to demonstrate its visible commitment to HS&EP.
- b. The Command Group will ensure that HS&EP arrangements are adequately resourced in order to meet statutory safety requirements.
- c. The Command Group will take advice from CESO(A) and their own Chain of Command.
- d. The Command Group will consider the HS&EP implications and impact of new policies to ensure they are workable. Where reasonably practicable, new policy must be circulated for comment by those in the Chain of Command whom it affects. The Command Group will review the HS&EP arrangements of key suppliers and contractors where risks have been identified. The subordinate Command Group will consider HS&EP and SD in the HS&EP Committee.

²⁴ JSP 815 Part 2, Leaflet 4 refers.

e. The Command Group will undertake HS&EP training on a periodic basis depending on turnover of members. Such arrangements for Command Group level training should be addressed through CESO(A).

4. **Monitoring HS&EP**

a. The Command Group will consider safety performance by reviewing both preventative information (such as training carried out and audit reports) and statistical analysis of accident statistics provided by Def Stats through CESO(A).

b. The Command Group is to direct that an annual review of the safety management system is carried out by the appointed safety adviser, in consultation with those to whom the system applies, to ensure that it remains timely and effective. A review may also be directed when matters arise which bring its effectiveness into question, or on legislative changes or process. The outcome is to be reported to the Command Group.

c. The adverse impact of new processes and practices in working arrangements should be captured in an OSA and be reported as soon as possible to the Command Group.

d. New and changed legal requirements are to be reported to the Command Group.

e. Safety management performance is to be reported on in appraisals.

5. **Reviewing HS&EP.**

a. It is intended that the review of HS&EP will take place at every Command Group meeting. The effectiveness of risk management and other H&S systems must be reviewed and reported to the Command Group.

b. Targets are to be set to improve HS&EP and benchmark against other TLBs or Command Groups.

ACCIDENT AND INCIDENT MANAGEMENT

1. This Annex specifies the procedure for reporting accidents, incidents, near misses, occupational ill health, serious equipment failures, ammunition incidents and dangerous occurrences including those involving fire, affecting any Army personnel, property or estate. It also covers the reporting of environmental incidents. It is to be complied with by all Army Formations and Units. It also applies to other TLB establishments commanding or administering Army personnel (military and civilian) and those users of Land Systems. The reporting requirements and method of notification is to be repeated at least quarterly on Unit Orders and must be included in exercise and training planning instructions.
2. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) require the MOD to report specified dangerous occurrences, ill health and accidents to the HSE within defined timescales. It is a legal requirement that a death, major injury or dangerous occurrence shall be reported to the HSE as soon as possible, and that any work related injury resulting in over 7 consecutive days incapacitation be reported within 15 days of the accident occurring/diagnosis. However, there is also a requirement to record all accidents and incidents below the 7 day threshold, some of which may result in a RIDDOR report being raised. Incapacitation means that the person is absent, or is unable to do work that they would reasonably be expected to do, as part of their normal work duties.
3. 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 objectives are introduced. The investigation of all accidents/incidents shall be proportional to the severity or potential.
4. AINC carries out the further reporting requirements on behalf of Army Units, to the relevant MOD and United Kingdom (UK) statutory authorities, including the HSE under RIDDOR and the Environment Agency(EA) under the Environmental Protection Act (EPA). In cases of Fire, AINC submits on behalf of units the MOD Form 1059 (Notification of Fire) to the Defence Fire Risk Management Organisation (DFRMO).
5. **ALL** accidents and incidents are to be reported to the Army Incident Notification Cell (AINC) without delay. In addition, the LAND Accident Investigation Team (LAIT) should be notified in the case of death, serious injury or serious equipment failure. Telephone 96798 6587 or +44 (0) 03067 986587.
6. JSP 375 Part 2 Volume 1 Chapter 16 provides the following definitions:
 - a. **Accident.** Any injury or occupational disease to a person or which caused/had the potential to cause a RIDDOR dangerous occurrence.
 - b. **Incident.**
 - (1) An event which causes loss or damage to property, plant or equipment due to a shortfall in safety measures.
 - (2) An intervention or enforcement notice from an internal or external regulator.
 - (3) Contamination of an individual or workplace by an article contaminated with chemical, biological or radioactive (CBR) material.

(4) A CBR contaminated article being lost from institutional control.

c. **Near Miss.** An event, while not causing harm, has the potential to cause injury, damage, loss or ill health, but which was avoided through circumstances or timely intervention.

7. AINC is the focal point for the notification and collation of all Army accidents, near misses, occupational ill health, serious equipment failures and dangerous occurrences including those involving fire, world-wide and all accidents and incidents should be reported to them. Accidents should be reported electronically in all cases wherever possible using the electronic version of [Form 510](#) which can 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 group mailbox at [Army LF-CESO-AINC-mailbox \(MULTIUSER\)](#) or via the internet email on [LF-CESOA-AINC-mailbox@MOD.UK](#) and not to individual desk officers.

8. During non-office hours normal and routine matters should be referred to the AINC on the next available working day. The data collected provides a mechanism for trend analysis for use by the Chain of Command. It aims to identify areas of risk in order to effect safety improvements.

9. MOD Claims Directorate makes extensive use of the AINC database when handling and settling claims. The Service Personnel & Veterans Agency also uses AINC data to validate claims by Service personnel in respect of the Armed Forces Compensation Scheme (AFCS).

APPLICABILITY

10. **Military Personnel.** This Annex applies to all officers and soldiers in Army units and any Army personnel commanded or administered by MOD or other TLBs both on and off duty. It includes all Reservists and Cadets when on duty. It extends to RN, RM or RAF personnel using Land Systems equipment, (eg weapons and vehicles) and members of visiting Armed Forces.

11. **Civilians.** This Annex applies to all civilian personnel employed by the Army TLB including locally employed civilian staff at their normal place of work or on business elsewhere.

- a. All MOD civilians suffering an accident or incident while at/or using Army TLB assets.
- b. Any accidents, near misses, occupational ill health, serious equipment failures and dangerous occurrences including those involving fire, involving contractors or members of the general public whilst on Army administered MOD land or property. Contractors may also report the occurrence under their own reporting procedures in addition to this requirement.

APPLIED THRESHOLDS FOR STATISTICAL INFORMATION

12. **All** accidents, incidents, near misses, occupational ill health, serious equipment failures²⁵ and dangerous occurrences including those involving fire, are to be reported to AINC. The AINC will allocate the required threshold categories or store them on the miscellaneous database. The definitions below will be used to produce the quarterly reports to Higher Formations and Command Groups. The categories as defined by JSP 375 Part 2, Volume 1 Chapter 16 are as follows:

²⁵ See also JSP 454 Version 6.1 Sep 14 for Serious Equipment Failure reporting requirements.

Definition	Description
Minor	Any injury, accident/incident that results in up to seven days lost time and is not reportable under RIDDOR or causes minor damage.
Serious	<p>Any injury, accident/incident that results in:</p> <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 major injury, accident/incident or dangerous occurrence. 3) Failure or corruption of safety measure or procedure (e.g. broken or damaged device). 4) Localised spillage or leak of pollutant e.g. short-term damage to flora and fauna (see JSP 418).

Major	<p>Any injury, accident/incident that results in:</p> <ol style="list-style-type: none"> 1) A fatality or severe injuries resulting in long-term illness or disability. 2) Fracture, other than to fingers, thumbs and toes. 3) Amputation. 4) Dislocation of the shoulder, hip, knee or spine. 5) Loss of sight (temporary or permanent). 6) Chemical or hot metal burn to the eye, or any penetrating injury to the eye. 7) Injury resulting from an electric shock or electrical burn leading to unconsciousness, or requiring resuscitation or admittance to hospital for more than 24 hours. 8) Any other injury: leading to hypothermia, heat-induced illness or unconsciousness; or requiring resuscitation. (9) Requiring admittance to hospital for more than 24 hours.
The following additional occurrences are to be notified to AINC	<ol style="list-style-type: none"> 1) Range Incursions. Range Incursions by land, sea or air. 2) Enforcement Action. Any enforcement action by the HSE, EA, local authority, internal regulator (DSEA/MAA) or their equivalents in Scotland, Northern Ireland or overseas. 3) Unusual Radiation Events. Unusual Radiation events include: Radiation overexposure (RF or otherwise), the

	<p>malfunction of medical, dental or industrial radiography equipment, the loss, theft or spillage of any items containing Radioactive Material.</p> <p>4) Munitions violations.</p>
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NOTIFICATION PROCEDURE

13. In the case of serious injury, initial notification as described below is to be made without delay. Whenever possible, notification of other injuries should take place as soon as possible after the accident or incident occurring. An update is to be sent to AINC as further details become available, quoting the AINC case number. Accidents or incidents reported by telephone or email should be followed up using Form 510. Where possible the Form 510 is to be sent electronically which will allow AINC to electronically update the database.

14. If there is any doubt as to whether an incident should be notified, contact AINC for advice. Notifications can be made to AINC via:

- a. Telephone. 96770 3661 Mil or 030 6770 3661. This is a smart number and can be used for out of hours notification as well as during office hours.
- b. Fax. On Form 510, (where electronic submission is not possible), to 94393 6889 or 01264 886889.
- c. Military E-mail. Via the Services DII network to Army LF-CESO-AINC-mailbox (MULTIUSER). E-mails to AINC are to be sent on RESTRICTED or below systems.
- d. E-mail. Via the internet to: Army LF-CESO-AINC-Mailbox@mod.uk

15. Locally Employed Civilians. Overseas, in addition to notifying AINC, accidents, near misses, occupational ill health, serious equipment failures and dangerous occurrences including those involving fire, in respect of locally employed civilians are to be reported in accordance with local arrangements.

16. Accident Records. All units are advised to retain completed copies of Form 510 with regard to all incidents for a period of 3 years in accordance with JSP 375, Part 2, Volume 1, Chapter 39.

AINC REPORT TO UNITS

17. Following initial notification to AINC, unit COs will be sent an acknowledgement letter 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.
- c. Provide a Learning Account.

ACCIDENT/INCIDENT INVESTIGATION

18. There is a legal requirement to carry out accident and incident investigation. Commanding Officers will have been notified of an incident in their area via the AINC. The requirement to produce a Learning Account, together with the format is set out in Appendix 1 to this Annex. Learning accounts should aim to investigate against the principles of the safe

system of work/training, eg. Safe Place, Safe Person, Safe Practice, Safe Equipment and should make recommendations to prevent recurrence.

19. **External Investigations.** Under certain circumstances an additional external investigation will be mandated. All incidents involving ammunition will be investigated by ATO.

PROMULGATION

20. The attention of all Army personnel and of all MOD Establishments commanding or administering Army personnel, is to be drawn to these orders.

21. Contact details for AINC and LAIT should be included in all Exercise Instructions and Duty Folders.

SUMMARY

22. It is mandatory to notify and to record all accidents, incidents and near misses. AINC can provide crucial statistical evidence to enable senior commanders to better manage safety across the Army. It also ensures that full and accurate reporting is made to statutory authorities and to the Army claims assessors. It is a vital component of Force Protection.

ADDITIONAL REPORTING OF INCIDENTS AND MATTERS OF PUBLIC INTEREST

23. **During Training.** An incident or accident during training will require an Incident Report (INCREP) in the following circumstances:

- a. The incident may arouse public interest or criticism.
- b. Ministers and senior officers must be informed of the incident.
- c. The incident has a criminal, disciplinary or security aspect to it.
- d. The incident results in death or injury.
- e. The incident involves ammunition or weapons.
- f. The incident may involve media enquiries.
- g. Mountain Rescue in Scotland.

24. An INCREP must be completed by the unit reporting the incident immediately. The report must include accurate information about the incident, the unit name and exercise or training being conducted. The report is to include details of who has been notified.

25. In addition it may be necessary to comply with Joint Casualty and Compassionate Policy and Procedures (JSP 751), Chapter 2 (Casualty Reporting), Infantry Training Volume 4, Pamphlet 21, Range Conduct and Safety Rules (Army Code 71080) or any other Army/Service order. INCREPs must be sent to the following:

- a. Army HQ – D Trg.
- b. HQ CTG.
- c. Fmn HQ.
- d. Bde HQs - both parent and local to where the incident occurred.

- e. Garrison HQ where applicable.
- f. CESO(A) – AINC mailbox.
- g. PS2(A).
- h. HQ JHC where applicable.
- i. Joint Casualty & Compassionate Cell (JCCC). In the case of death or listed casualties reported by NOTICAS in accordance with JSP 751. The preferred method is via JPA, but where this is not available or JPA is offline, units are to send a NOTICAS by fax to 95471 7363 or 01452 510807. Units should alert the JCCC by telephone on 95471 7325 or 01452 712612 Ext 7325 that a NOTICAS is being sent.
- j. **Serious Equipment Failures** are to be notified to LAIT and AINC in parallel with SEFIT during working hours. For out of hours reports, SEFIT can be contacted on 07979 700996. Within BFG the Out of Hours contact number is 01722 021434. The BFG SEFIT Team is based in Bielefeld.
- k. Chain of Command. In the event of any environmental incidents, reports should also be made to the Chain of Command.
- l. Local Fire Advisor. In the event of fire, notify local DFRMO Area Manager.
- m. RTA. In the event of an RTI report, in accordance with JSP 800, by F/MT3.
- n. RMP. In cases of death or serious injury, the accident must be reported to the nearest RMP station in accordance with LFSO 3203.

26. **Ammunition.** In the event of an ammunition incident including FFE violations, the following are to be notified.

- a. **In 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. **In Germany.** In Germany the following action is to be taken:

(1) **During working hours.**

(a) **Range incidents.** The unit is to inform Range Control of the 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.

- c. **Elsewhere.** 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 ATO support is available, units are to report all ammunition accidents to the Ammunition Incident Hotline.

e. **AINC.** The AINC is to be informed in all cases.

27. **Major Media Interest.** Some major incidents may have the potential for intensive media activity. Where this is judged to be the case, and reporting through the Chain of Command might result in delay, the unit or formation with the knowledge of the incident should make initial reports direct to the following:

a. **All hours.**

(1) Chief of Defence Staff Duty Officer (Main Building)

Mil: 9621 88938

Civil: 0207 21 88938

(2) MOD Press Office Duty Officer (Main Building)

Mil: 9621 87907

Civil: 0207 21 87907

Appendix:

1. Learning Account template.

LEARNING ACCOUNT

1. The Learning Account is an important part of the reporting procedure. It allows detailed trend analysis to take place and provides recommendations to prevent an immediate recurrence of the incident. All accidents and incidents should be investigated and the outcome of those investigations are to be sent to the AINC and LAIT. The AINC system produces a letter to Commanding Officers requesting that a Learning Account be raised; however, there are times when no report from the unit is required. These are as follows:

- a. Sporting injuries.
- b. Operational injuries and incidents already covered by LFSO 1118 reporting requirements. Non-Battle Injuries and incidents may still require a Learning Account to be produced.
- c. Those injuries categorised as minor (as detailed in Annex B) unless directed by CESO(A).

2. CESO(A)/Centre for Army Lessons and Safety (CALS) will conduct a fortnightly Military Judgement Panel where direction on the provision of additional Learning Accounts or further information requests to units may be given.

3. Learning Accounts are to conform to the format set out below for non-operational injuries and incidents. Learning Accounts for both operational and non-operational incidents are contained in LFSO 1118, Annex C, Appendix 3.

FORMAT

File Reference

Date

See Distribution:

THE INFORMATION IN THIS LEARNING ACCOUNT (LA) IS BASED ON INFORMATION KNOWN AT TIME OF SIGNATURE AND MAY BE INACCURATE; CONSEQUENTLY IT MUST BE VIEWED AS A PROVISIONAL REPORT AND NOT A DEFINITIVE VERSION OF EVENTS

LEARNING ACCOUNT – METHOD OF INJURY – (number of) CASUALTIES and rank, name, unit) ON DATE

References:

- A. *Supporting evidence and reports as required²⁶.*

²⁶ Policy documents, Formation Orders and Directives will usually be listed as a Reference rather than attached.

1. **Overview.** A broad overview of the event²⁷; a summary of who, what, where, when and how. If there is a stand out issue then this should be mentioned here. Do not provide detail, such as names of individuals, grid references etc. The last line is to indicate the number and type of casualties by category.
2. **Background.** This should include a short synopsis of the provenance of the task or operation. Follow specified conventions for names of people, equipment, vehicles²⁸, locations²⁹, grid references³⁰, call signs³¹. Do not use military terminology or jargon, you are writing for a mixed civilian/military audience – potentially a Coroner with little or no military experience. Use footnotes to explain procedures and terminology in detail when it is thought necessary to illuminate for the uninitiated. Some of the factors that should be included here are:
 - a. Detail of the Area of Operations/location in which the incident took place.
 - b. 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 and so forth.
 - c. Consider “risks” as widely as necessary – weather, terrain, equipment in use and other factors such as civilians.
 - d. Any planning factors considered or briefings received by the body of personnel that were undertaking the given task. Identify any applicable policy.
 - e. Include any other specialist agencies such as Civil Police in response to an RTA.
 - f. Considerations would include factors such as duty patterns, training programme, fatigue, social considerations, relevant medical aspects and state of equipment in use.
3. This information will assist those who were not there to develop an understanding of the context of the incident. Also include the names of personnel directly involved in events in the ‘Personnel Involved’ annex as a table.
4. The Learning Account should be produced at the lowest Protective Marking commensurate with the contents; preferably, this will be OFFICIAL. To assist rapid declassification at a later date, eg. for use in a Coroner’s Inquest, each paragraph must have its Protective Marking appended at the end, in brackets where the classification is raised above Official -Sensitive.
5. **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.
6. **First Aid/medical arrangements.** This should outline in general the treatment delivered rather than a graphic description of the wounds.
7. **Why the incident happened.** This is your opportunity to suggest why the event happened. The intent is to be objective and impartial. The purpose is not to second guess commanders or apportion blame, but to highlight the contributory factors. Similarly if a Tactic, Technique and

²⁷ The explanatory text used here is biased towards an operational context, but is readily adapted for non-operational incidents in consultation with CESO(A)/PPSI.

²⁸ Put names of people, equipment and vehicles in BLOCK CAPITALS. Refer to serving personnel by rank then surname each time in full.

²⁹ All location names are to be written in full the first time they are mentioned, in BLOCK CAPITALS, followed by their abbreviation.

³⁰ Footnote grid references (GR) (do not place GR within the main body text).

³¹ If appropriate suffix an individual’s Call Sign (C/S) after they are mentioned for the first time eg Sgt NOMINAL (C/S 30A).

procedure (TTP) or a recognised operating procedure was carried out differently to a recognised way, or not at all, or equipment failed, then this is useful to know.

8. There is no space limit on this part of the report.

9. **Immediate issues have been identified.** (This part of the Learning Account allows the authors to highlight what went wrong, things that went right or anything else that others might conceivably learn from. Units should not shy away from making bold recommendations as these can be discussed with the Lessons desk and SMEs to ensure that they contain the correct level of content for subsequent action or tasking. **The key output is actionable recommendations:**

a. **Issue 1 – This should be a meaningful, succinct title for the issue.** Highlight the problem.

(1) **Issue.** Completed by the Unit; as many issues should be listed as are warranted by the incident and situation. This part of the identified issue should include an **observation** (what actually happened? Stick to the facts), **discussion** (what was supposed to happen or what did you expect to happen? What caused the difference between what was supposed to happen and what actually happened? Provide as much evidence as possible to justify the root cause(s) identified). A **conclusion** (a short summary of the observation and discussion and why it amounts to a Lesson) is needed.

(2) **Recommendation 1.** Completed by the unit. A recommendation should outline a single action. Who needs to change what to prevent a repetition of what happened? Describe the remedial action that should be taken and specify the action body (or person) responsible for implementing the remedial action. Do not “over-specify”: you do not need to come up with the exact solution to the problem, but you do need to be able to indicate what a solution might look like or achieve. Recommendations can be about the specific event, or address areas of training, equipment capability or similar, that require action by organisations outside of the immediate unit or relevant formation HQ. Recommendations can cover actions needed within the unit or deployed force – including recommendations already actioned (which will then be noted in the next section of the report).

(3) **Recommendation 2.** There can be more than one recommendation per issue.

(4) **Endorsement or comment by higher authority.** Completed by formation HQ or HQ UK NCC, depending on the size of deployment. Where a unit has made a recommendation, the relevant HQ will make comment or simply endorse the recommendation. Where another issue or recommendation for learning has been identified by the formation HQ, this section must say so. Non-operational Learning Accounts will include comment from the PPSI team in the relevant HQ. If a recommendation is not endorsed by the higher authority, state why.

b. **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. Try to describe in a similar style to issues as above; Observation – Discussion – Conclusion.

10. **Immediate action taken to prevent recurrence.** This allows the unit and HQ to outline what activity they have, or will, undertake 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, with rationale. The unit should list its changes to be carried out or carried out already; where appropriate, the formation HQ will highlight additional tasks in accordance with its recommendations and comments shown above.

11. Signed and Counter-signed by the unit and by a higher authority staff officer³².

Distribution

External:

Action:

DPS(A) for PS2(A) - Service Inquiries
- Lessons

CESO(A) for SO1 Safety Management

Copy to:

Army Insp for SO1 H&S
Ch LAIT
DLW LXC for XO
Relevant CD

³² Learning Accounts from operations are to be signed by both the unit CO or adjutant and the lead staff officer in the immediate higher HQ. Learning Accounts from incidents not in an operational theatre are to be signed by both the unit CO and the Permanent President Service Inquires (PPSI) co-located with each Service Inquiry Convening Authority (CA) (normally Div HQ or Sp Comd HQ).

TERMS OF REFERENCE FOR THE ARMY ENVIRONMENT AND SAFETY WORKING GROUP (AESWG)

1. The AESWG is the principal Army Command Health, Safety and Environmental Protection (HS&EP) forum whose main role is to provide cross-command coherence on S&EP issues. It also seeks to identify S&EP risk and co-ordinate mitigation measures. It is the purpose of the WG to provide advice to the 3* pillars allowing them to make informed decisions. The working group will be informed by incident and trend reporting from the Army Incident Notification Cell (AINC) in order to track and monitor trends in the safety environment and ensure where appropriate, individuals and organisations are held to account for their actions.
2. In addition, it is to be the forum for discussion on RtL activities between Operating Duty Holders (ODH) and Capability Directorates (CD) (and DLoD leads) as the Duty Holder facing SMEs³³. Participation in the WG is from across the Command and is aligned to the Duty Holding (DH) process.
3. The Main Tasks for the WG are:
 - a. **Duty Holding.** The AESWG will be the main forum for the development and maintenance of the DH process for the Army. Under this heading, it will:
 - (1) Advise on design and maintenance of DH policy.
 - (2) Monitor the training of appointed Duty Holders.
 - (3) Monitor the levels of Suitably Qualified and Experienced Personnel (SQEP).
 - (4) Maintain the record of appointed DDH.
 - (5) Maintain records of RtL activities within each ODH AOR.
 - (6) Provide a mechanism for informing the CoC (through CGs) of emerging issues and key risks reported at the meeting or through elevation from the Land System Safety Working Group (LSSWG).
 - b. **Army Safety, Environmental Protection and Sustainable Development (SD).** The AESWG will provide 3* commanders and, in turn CGS, with the necessary assurance that effective arrangements and organisations are in place to discharge the responsibilities placed upon them jointly by the CDS/PUS in respect of Army Safety, EP and SD. It will ensure that a coherent approach is achieved Army-wide in the delivery of policy and objectives and will review any Safety, EP and SD issues passed to the WG with the aim of achieving a resolution or elevating them, if required. In particular the WG will oversee the implementation and operation of an effective Army Health Safety, EP and SD structure that allows 3* commanders to discharge the responsibilities placed on them in their delegations and ensure compliance with legislation and MOD policy. The WG is to address the following as standard agenda items:

³³ The DH Facing SME is an expert within their field who resides in the Army HQ and will act as the conduit for Army HQ advice to Duty Holders.

- (1) Equipment Safety - issues identified via Land System Safety Working Group (LSSWG);
- (2) Organisational/Personnel safety issues;
- (3) Holding to Account - track decisions and actions taken to hold individuals and organisations to account where breaches in policy or legislation resulting in material loss, damage to reputation, injury or death have occurred.
- (4) Infrastructure - issues identified from Defence Infrastructure Organisation (DIO)/Defence Training Estate (DTE) in regards to the fixed Estate, including any EP and SD issues;
- (5) Regulation/Audit - the regulatory environment, new and emerging legislation, duty holding issues/update on implementation and audits;
- (6) Communication - delivering the safety message, sharing knowledge;
- (7) Training Safety - training safety issues, including lessons learned and any matters requiring direction, which would previously have been referred to Standing Committee On Training Safety Army SCOTS(A) (now defunct).
- (8) Logistics - including Road Safety, carriage of dangerous goods/HAZMAT, the management of ammunition, fuel and gases, air despatch, port and maritime and food services;
- (9) Enforcement Action - discuss and report any internal and external actions, e.g. improvement and prohibition notices.

4. The AESWG is to meet initially on a biannual basis, as directed by the Chairman. At the initial stages of DH bedding in, this frequency may be increased in the short term. Matters of immediate importance will be dealt with out of committee.

5. The WG is chaired by COS LF. The secretariat for the WG will be provided by SO1 H&S CESO(A). Membership of the Board is set at AD/SO1 level and representation is required as follows:

COS LF	Chairman
CESO(A)	
3UKXX-CGP-DCOS	
3 UKXX SO1 SHE	
ACOS Sp – Sp Comd	
Sp Comd SO1 SHE	
1UKXX-CGP-DCOS	
1 UKXX SO1 SHE	
ARTD DCOS	
ARTD SO1 SHE	
FTC-CGP-COS	
FTC SO1 SHE	
LONDIST-DCOS	
LONDIST SO1 SHE	
JHC-SA-AD	

JHC SO1 Grd Safety	
AMD-Med-Health OM-SO1	
Cap Cbt DCC AD	Chair of Army Hearing Working Group
Sp Comd HQ Cadets	
DCESO(A)	
SO1 Safety Perf CESO(A)	
SO1 EP and SD CESO(A)	
SO2 EP and SD CESO(A)	
SO1 Safety Policy CESO(A)	Sec
DIO SD Trg HQ Plans Safety	
DLoDs	
Eqpt	Army Eqpt-Plans
Head IS	Army IS-C4ISR
Info	Army Cap-Info-Plans
Log	Army Log-CSS-Sp-Assurance
Org	Army Plans-Org
Pers	Army PersCap-AD
Trg	Army TrgCap-AD
DInfra	Army Infra-Plans
Doctrine	LWDG-WARDEV
CDs	
Cbt	Army Cap-Cbt-FDT-AD
CS	Army Cap-CS-OrgPlans-AD
	Army Cap-CS-MilEng
CSS	Army Cap-CSS-LogCD-AD
	Army Cap-CSS-ESLAND-AD
	Army Cap-CSS-Avn-CAE
	Army Cap-CSS-SA-SO1
Info	Army Cap-Info-Plans-AD
CATO	Army Cap-CSS-Log_CATO
DG Cap	Army Cap-LCMB-Plans-Info
DLW	Army DLW-LXC-AD
DFRMO	DFRMO-HQ-FS
In Attendance	
Dep Army Inspectorate	

DUTY HOLDING

1. Direction on how the Army deals with those activities that pose a Risk to Life (RtL) – encapsulated in the process known as Duty Holding (DH) – is found in [Op Order 14/002 – The Army's Approach to 'Risk to Life'](#)³⁴. This is compliant with direction given in JSP 815 Part 2, Leaflet 2.
2. Some areas of Army RtL activity have added layers of complexity that require additional explanation. These are covered in this annex.

DH ON OPERATIONS

2. **DH on UK resilience operations.** Normal DH principles will apply, but it must be recognised that complex force packages involving all three 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 OpO.
3. **DH on Overseas Operations.** It was a clear recommendation made by Sir Charles Haddon-Cave QC in the Nimrod Crash Report³⁵ that DH would extend to overseas operations. Each front line command has developed their own model for DH within broadly accepted principles. The key stakeholders within the Land environment are those who force generate Land Force Elements (FE) for use on operations, principally CLF and those who then employ those FE, principally Comd JFC. Both stakeholders must be in full agreement on the process employed and how to arbitrate in the event of disagreement. There must be no ambiguity in where responsibility and accountability lies.
4. **Assumptions.** Key assumptions that underpin the model are:
 - a. CJO appoints Duty Holders in those areas where he has direct control over an activity. This is envisaged in five discrete areas, including by example:
 - (1) Ordnance, munitions and explosives. Principally around base storage and issue.
 - (2) Transport and movement with a focus of the transportation of Dangerous Goods (DG) to and from theatre.
 - (3) Fuels and Gases. Principally around base storage and issue.
 - (4) Infrastructure. The construction, development, maintenance and usage of permanent infrastructure to support operations.
 - (5) Land Systems. Where they support activity outside of the assigned Land FE.
 - b. There is a clear understanding between CJO and Army force generators of the operational standards that FE are to meet – the theatre entry standards - prior to deployment.
 - c. The force generating HQ is best placed to judge the abilities and standards of FE on deployment.
 - d. CJO does not have the resources to monitor and assure all activities that occur under his OPCOM and depends on force generating Duty Holders to meet that deficiency. Furthermore he does not have access to DH-facing SMEs to provide advice on the tolerability of risk.
5. **Principles.** Some additional principles to those that underpin current DH understanding are required for the operational environment. These are:

³⁴ Army/COS/14/2/10 dated 28 Feb 14.

³⁵ An Independent review into the broader issues surrounding the loss of RAF Nimrod XV230 in 2006.

- a. Short term tactical decisions will **always** remain the preserve of the OPCOM chain. Duty Holders may only interpose when tolerability and ALARP status for an activity are **habitually and enduringly** compromised.
- b. Delivery Duty Holders will trigger a discussion when risk within RtL activities undertaken by FE, as part of the agreed theatre entry standard, are no longer tolerable and ALARP.
- c. The Operating Duty Holders will be the 2* force generators of the Land FE assigned to the operation. It is unlikely, under Full Command, that Operating Duty Holders will have deployed.
- d. A discussion between ADOC, PJHQ and CESO(A) that confirms DH arrangements for an operation must take place before publication of the Force Generation Order.

CONCEPT OF OPERATIONS

6. **Intent.** Where RtL activities go beyond planned tolerability and ALARP levels and control measures cannot be applied by the in-theatre Delivery Duty Holder, consultation will take place with the 2* force generating Operating Duty Holder, usually remaining with the Firm Base, for further advice and a decision. Where agreement cannot be reached at one level, the principle of elevation up the DH chain will apply.
7. **Scheme of Manoeuvre.** The theatre entry standard agreed between PJHQ and the force generating HQ sets the agreed level and conditions for RtL activity within theatre. At the outset of an operation and after the reconnaissance and estimate process have determined the Operational Establishment Table (OET), Army HQ and PJHQ will discuss and confirm DH arrangements. On deployment and where RtL activity deviates from these agreed norms on a habitual basis, the Delivery Duty Holder is to confer with OPCOM Chain of Command and introduce control measures that brings the activity back to ALARP. Where this is not possible the Delivery Duty Holder is to consult with the Operating Duty Holder, explain the risk, obtain assistance and advice from Duty Holder-facing SMEs and attempt to bring the risk back to tolerability and ALARP. If this remains impossible the risk should be passed to the Operating Duty Holder, who will continue the debate with the OPCOM Chain of Command in an effort to resolve the situation, either by introducing further controls or by curtailing the activity. Where resolution is still not possible this will be elevated to the Senior Duty Holder who will confer with Comd JFC for an agreed course of action.
8. **Main effort.** To bring the activity back to tolerability and ALARP at the lowest level possible eg. Delivery Duty Holder. This CONOPS has been agreed with JFC and is contained in JFC SOP 0013 dated 17 Oct 13. A pictorial representation of the CONOPS is at Appendix 1 and a process flow diagram is at Appendix 2 to this Annex.
9. **Individual Augmentees.** In the event of the Army groupings falling below a critical mass (typically sub-units) the DDH may either come from another Service to which the Army grouping is attached or be nominated by PJHQ with CJO acting as ODH.

CADETS

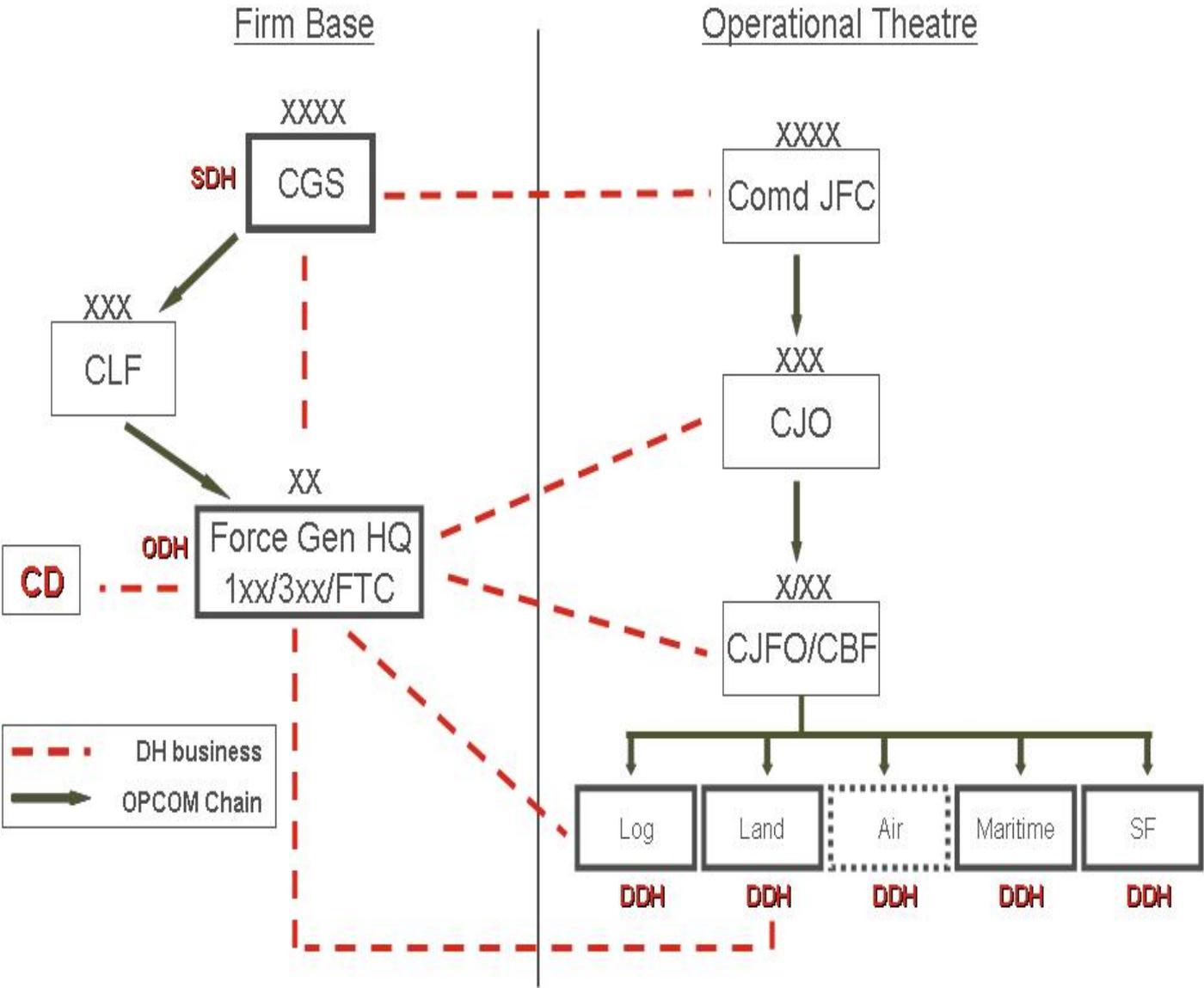
10. The principles for DH for cadets - ACF and CCF - are the same as for regular and reserve personnel. GOC Sp Comd will be Operating Duty Holder for all cadets, irrespective of the regional/functional brigade in which they are located³⁶. 1* oversight will be vested in Bde Comds, with County Commandants within the ACF and contingent commanders within the CCF, as Delivery Duty Holders. The Duty Holder-facing SME for cadet matters will be ACOS Cadets, HQ Sp Comd.

³⁶ Under Army 2020 cadet battalions and contingents will be located within AF and FTC Bde with a Regional Point of Command and LONDIS.

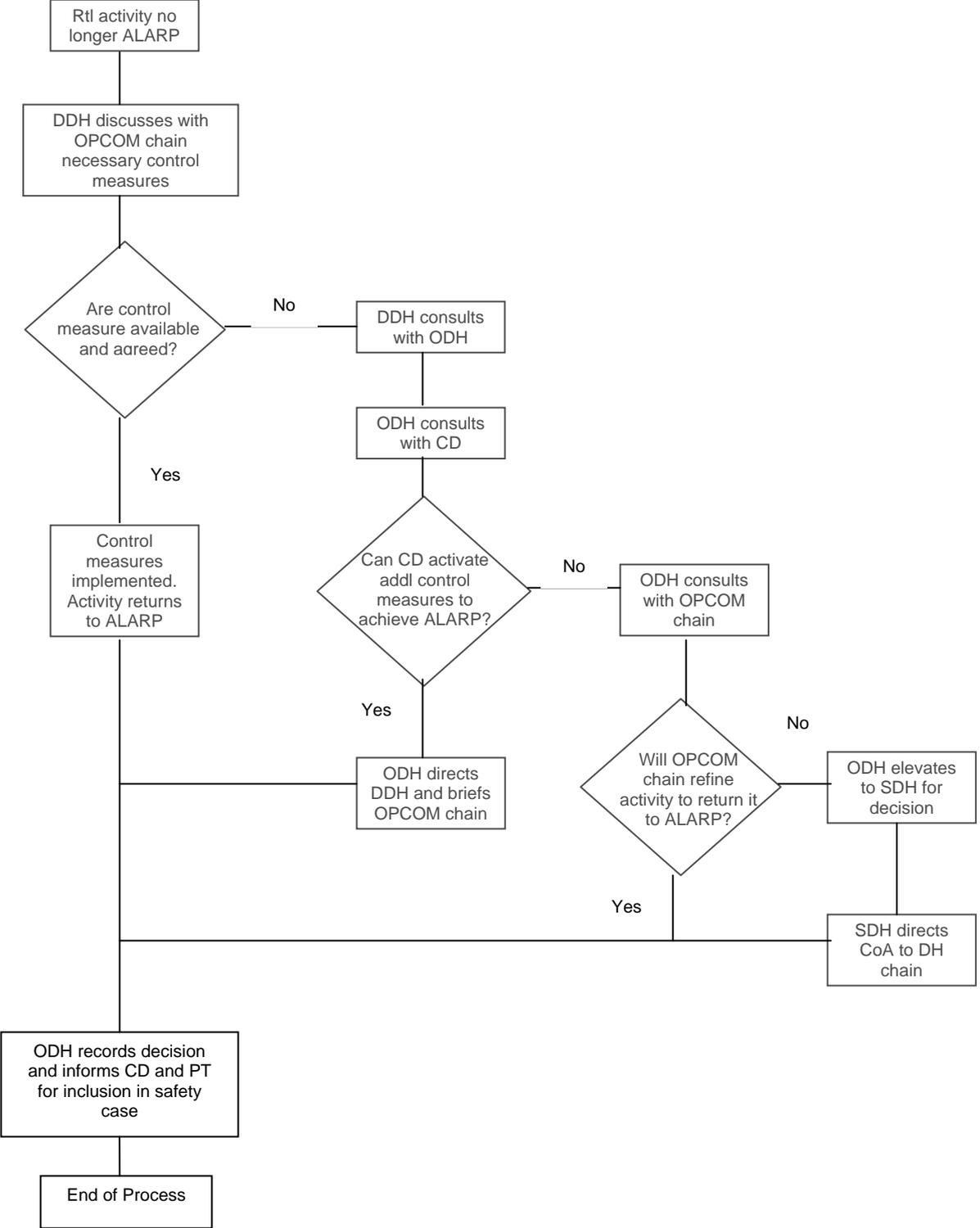
SPORT AND ADVENTUROUS TRAINING

11. Due to the complexity of command and governance arrangements within Adventurous Training (AT) and Sport it has been necessary to publish a separate [FragO, FRAGO TO OPO 14/002 – The Army’s Approach to Risk to Life – Sport and Adventurous Training](#), to cover these activities.

**DH ON OVERSEAS OPERATIONS
CONCEPT OF OPERATIONS**



**DH ON OVERSEAS OPERATIONS
PROCESS FLOW**



CAPABILITY DIRECTORATES – ROLE AND RESPONSIBILITIES

1. **Safety Management of Capability.** The policy is set out in DG Cap's paper³⁷ which reflects the changes following the formation of the CD. CD acts as co-signatory to Part 3 of the Safety Case (SC) to ensure cross DLoD integration and have a key role in the production of SC Reports (SCR).
 - a. **New capability.** For new capabilities the Part 3 is to be developed for presentation to both the DE&S Programme Team Leader (PTL) and the CD. The resultant SCR therefore provides a '*snap shot in time*' to demonstrate that the hazards have been identified and appropriate mitigation measures developed. Once the PTL and the CD reach agreement, they are to jointly endorse the SC.
 - b. **In service capability.** In service capabilities should already have a Part 3 SC or Safety Statement. Thus when these are due to be reviewed the appropriate CD is to become co-signatory via a similar SC review process. Remedial action does not have to happen immediately, but is required to be considered as ALARP. However, any urgent reviews are to be completed immediately. The remainder can be addressed within the normal review process identified in JSP 454, Version 6.1 Part 2, Defence Code of Practice (DCOP) 4, Regulation 4, paragraph 37.
2. **Process.** Under this process the PTLs sign to confirm that the capability is safe by design whilst the CD signs (on behalf of the FLC) to confirm that the capability will be used safely. In doing so, the PTL should be signing to record that risk has been reduced so far as is reasonably practicable through the Equipment and Support DLoDs, and that information about the residual risk to be managed has been accurately reflected in the SC. The CD should be signing to record that the risk has been reduced so far as is reasonably practicable through the other DLoDs, that all the arrangements are actually in place, that the Army accepts the responsibility of maintaining these arrangements and (on behalf of the Duty Holder) that it accepts the residual risk of operating the capability.
3. The Army Capability Management Model is shown at Figure 4 below. This identifies the functional responsibilities of the key players. Within the model, DG Cap leads Capability Management for the Land environment on behalf of CGS, and is responsible for Capability Planning and integration of Delivery across DLoDs. Working to DG Cap the model has CD (shown vertically) planning capability by DLoD and setting requirements using DLoD information. Advice and programme detail is provided by the supporting DLoD organisations. CD will also integrate across DLoDs to deliver capability into Service and ensure coherent capability is maintained once in Service.
4. The DLoD organisations (shown horizontally in blue) align resource to the requirements set by the CD and manage their DLoD programme, delivering as directed, driving efficiencies and managing the risk within their area of responsibility.
5. **Roles and Responsibilities.** CDs 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 DLoDs³⁸. The CD responsibilities include setting HS&EP requirements during the planning stages of a capability's life and

³⁷ Land Environment Safety Management in the Capability Directorate Era (DG Capability/4/5/10 dated 6 Jul 12).

³⁸ It should be noted that the equipment DLoD is specifically managed by D Eqpt (on behalf of DG LS&E) and his staff are organised to support CD.

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 Work³⁹/Training.

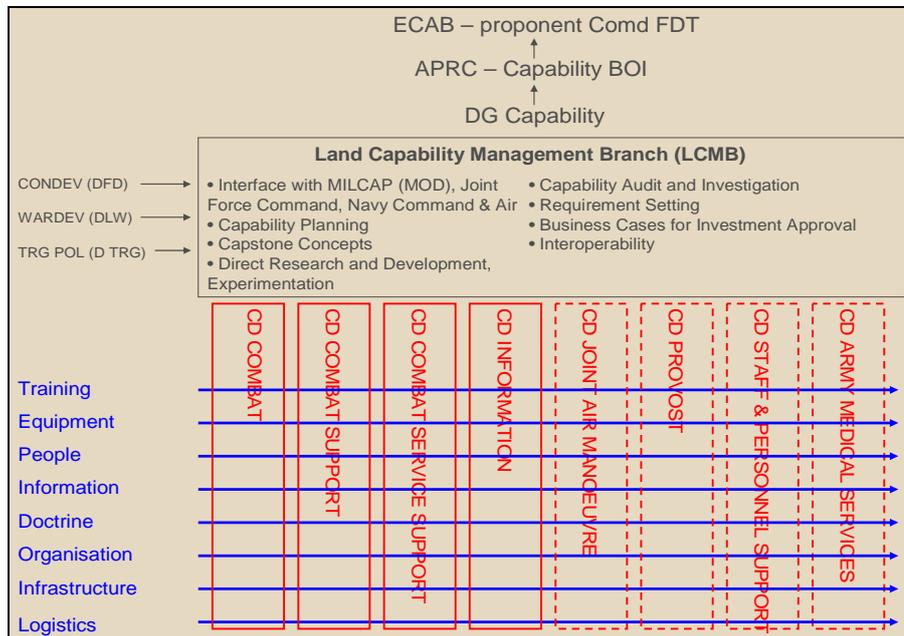


Figure 4. Army Capability Management Model.

b. Working with stakeholders across all DLoDs and in conjunction with the relevant PTL, 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 met⁴⁰.
- (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.
- (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 PTL.
- (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 PT project staff such that they can document it in support of their SC audit trail.

³⁹ Safe Place, Safe Person, Safe Equipment, Safe Procedure.

⁴⁰ JSP 815, Defence Environment and Safety Management Annex A.

(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 DG Cap, copied to the PTL.

(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 SC⁴¹. 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 PTs 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 LFSO, 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 policy⁴², 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 LAIT, SI or external reports, are promulgated to the Chain of Command and implemented.

f. Providing the ACA&I 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. The detailed policy to be followed in respect of the management of equipment safety is laid down in a DG Cap policy directive.⁴³

(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

⁴¹ Refer to JSP 454 for detail of the Op Dispensation process.

⁴² <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>

⁴³ DG Capability/4/5/10 dated 6 Jul 12 – Land Environment Safety Management in the Capability Directorate Era.

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 PTs.
- (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.
- (10) Provide Safety Assurance input for the ACA&I report.

SAFETY CASE MANAGEMENT

6. A SC is a structured body of evidence used to determine that in-service equipment is safe by design and has the correct policy and procedures employed by TLBs to ensure that the equipment is safe for use.
7. Equipments 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 Modifications⁴⁴.
8. The Part 3 SC sets out the argument for in-service (Operation and Support) Safety and Environmental Protection (S&EP) compliance for a particular capability. It is developed and maintained by the PT, but is formally owned by the CD on behalf of the Front Line Command⁴⁵.
9. The End User who is charged with operating⁴⁶ 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 i.e. In user documentation, training, warnings and cautions etc.
10. Chief of Materiel/Chief Information Officer delegate responsibility for the through life safety management of a capability to the PTL. To ensure that safety management is conducted reasonably, each PT establishes and chairs a SP/ Safety Committee of suitably qualified and experienced personnel (SQEP).
11. DG Cap delegates authority for ownership of the Part 3 SC (Operation and Support Safety) on behalf of the Front Line Command to his CD in accordance with LFSO 3216 and the DG Cap Responsibility Matrix. To provide through life management of capability, each CD establishes a CIWG⁴⁷ 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 PT Safety

⁴⁴ Details Contained in JSP 886, Volume 5, at Part 2a, paragraph 7b.

⁴⁵ DG Capability/4/5/10 dated 6 Jul 12.

⁴⁶ In this case this will be the Head of Establishment (HoE).

⁴⁷ 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.

Manager reports SC development progress⁴⁸ against milestone events⁴⁹ through the equipment DLoD representative at the CIWG.

12. At ISD, the CD 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.

13. **Part 3 SC Endorsement.** The Part 3 SC Endorsement/Review process is shown at Appendix 1 to this Annex⁵⁰ with an example template at Appendix 2. Prior to ISD, or at annual review date, the PT Safety Manager notifies the appropriate CIWG/AWG of the intention to review and endorse the Part 3 SC. The PT Safety Manager completes Parts 1 to 4 and then submits the template to the CIWG secretary⁵¹ seeking supporting DLoD and CD statements.

14. On receipt, the CIWG Secretary: notifies the CIWG/AWG chair and CD Safety Advisor⁵²; identifies DLoD leads (by organisation) and the relevant Lead User (CD) staff in order to obtain necessary supporting safety statements. The CIWG Sec then completes Parts 5, 6a, 7 and 8 of the template.

15. 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 CD 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 PT Safety Manager.

16. Once the supporting statements have been provided to the PT 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 CD 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 CD.
- f. Assessment of maturity statements from DLoDs.

⁴⁸ Production of the Part 1, 2 and 3 SCR.

⁴⁹ Initial Gate, Main Gate, In Service Date and annual review.

⁵⁰ Legacy equipments may not have been subjected to the CIWG process.

⁵¹ If CIWG is not known, the template should be submitted to the CD's Capability Single Point of Contact (SPOC) or the Safety SPOC.

⁵² If not already aware.

17. Having gained SCR approval the PT Safety Manager archives all the supporting evidence, and adds links to these on the template before submitting the completed template⁵³ to the PTL for Part 3 SCR endorsement and to the CIWG Secretary for CD endorsement⁵⁴. 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 CD⁵⁵ via an advisory statement reports whether:

- a. The Chair has/has not undertaken Systems Safety in Action training and is SQEP in accordance with LFSO 3216.
- b. All DLoDs have/have not provided supporting statements that risk controls are in place.
- c. The CD 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 CD was/was not represented was/was not SQEP and attended the SP/Safety Committee.
- f. The CD Safety Advisor has/has not been consulted (where necessary).

18. Following CD signature, the endorsed SCR is returned by the CIWG Secretary to the PT Safety Manager for retention.

19. The SP/Safety Committee is the forum through which the PT 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 that⁵⁶:

- 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.

20. The CD represents⁵⁷ the FLC on SP/Safety Committees. After the Part 3 SCR has been approved by the SP/Safety Committee, it is submitted to the PTL and CD for their initial joint

⁵³ All reference links are to be established as Records.

⁵⁴ CD may determine the appropriate level for endorsement of SCR based on risk posed by capability.

⁵⁵ Or delegated appointment.

⁵⁶ JSP 454 Land Systems Safety and Environmental Protection Part 1 Version 6 dated 1 September 2014.

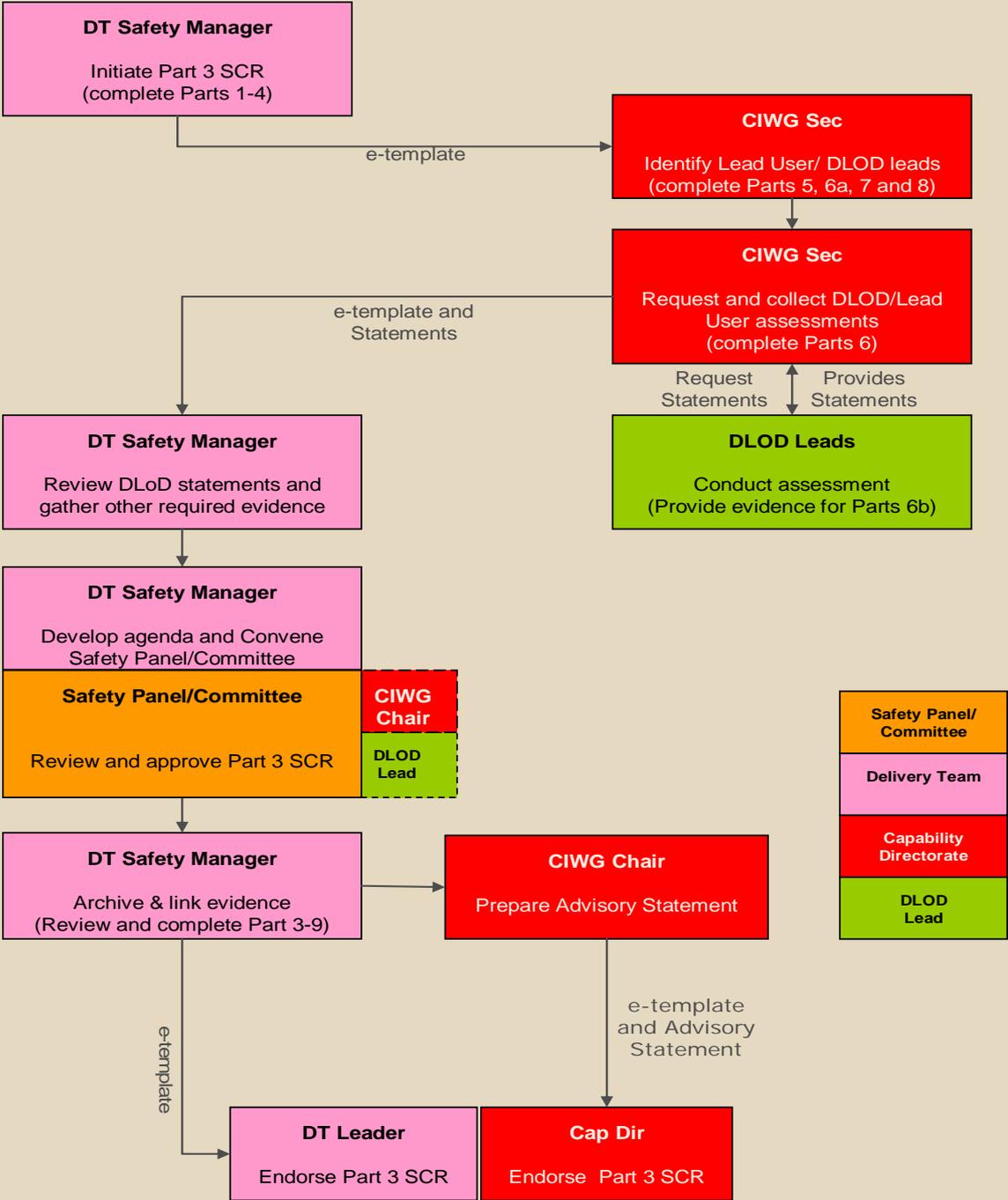
⁵⁷ Or arrange for other empowered representation to attend.

endorsement at declaration of ISD, and annually thereafter⁵⁸. It does not need to be re-signed 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.

⁵⁸ Annually or tailored to fit, in accordance with JSP 454 Part 2, Para 36.



Part 3 Safety Case Review Process



**APPENDIX 2 TO
ANNEX E TO
LFSO 3216
DATED MAR 15**

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			
Organisation			
Information			
Logistics			
Security			
7. AWG Chairman:		Lead User Delegated Authority⁵⁹:	
8. CD Supporting Statement:			
9. Safety Panel Part 3 SCR Approval RODs Link:			

⁵⁹ Where Lead User receives authority from.

DISPENSATION AND RISK REFERRAL PROCESS

DISPENSATIONS

- 1. Operational Dispensation.** Dispensations may occur when the routine use of equipment is knowingly being operated outside its safe operating envelope as defined by the SC in an Operational Theatre. This includes equipment being used to conduct training in the operational theatre.
- The Operational Dispensation Process is designed to support Theatre Commanders who, for operational reasons, require utilising equipment outside of its SC on an enduring basis. 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 Subject Matter Expert (SME) should ascertain whether this contravenes the existing SC through consultation with the DE&S PT and relevant CD. The Operational Dispensation Process is illustrated in Figure 5 below.
- A request for an Operational Dispensation should be made by the Th EC Cell to the relevant DDH. 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 DDH is empowered to authorise an Initial (28-day) Operational Dispensation. It must be copied to PJHQ J3 for entry on to the theatre dispensation register, the relevant CD and DE&S PT.
- Following authorisation of the Initial Operational Dispensation, the Theatre EC Cell⁶⁰ must submit a Urgent Statement of User Requirement (USUR)⁶¹ 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 Operational Dispensation). USUR submissions are to be staffed to Army HQ – Cap DG Plans CSS SO1 for dissemination to the appropriate CD lead.
- The relevant CD, on being informed that the Initial Operational Dispensation has been granted, must liaise with supporting SMEs (Eqpt Dir/Hd IS) and the relevant PT and urgently convene a Dispensation Safety Panel (DSP) meeting to coincide with the endorsement of the USUR. The DSP shall be chaired by the CD at a minimum of OF4/SO1 level; it shall have appropriate user representation⁶².
- 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 CD should also start investigating other solution options, including new equipment through UOR, enabled by the USUR raised.
- If the risk can be mitigated within the initial 28-day dispensation period, the chair of the DSP will on behalf of the CD, 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 Operational Dispensation can be closed, superseded by a revised SC, once mitigation measures have been implemented. Acceptance of risk may be

⁶⁰ Where a Theatre of operations does not have an EC Cell this function should be undertaken by the National Support Element.

⁶¹ A USUR is part of the UOR process defined by 2012DIN04-042 UOR Standing Instruction Version 7.

⁶² Routine attendance should not be assumed, and user representatives from all levels should be anticipated.

sanctioned through a variety of means for example (but not limited to) DSP Minutes or Records of Decisions, a SCR and SC amendment.

8. If the risk cannot be mitigated within the initial 28-day dispensation period, e.g. 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 Operational Dispensation Report. The report is to be completed within the initial 28-day dispensation period and must recommend that PJHQ/DDH seek an Operational Dispensation from the relevant 2* responsible for force generation, the ODH.

9. On receipt of the report, if the requirement remains extant, the DDH may then issue a further temporary (28-day) dispensation in order to allow time for the Operational Dispensation to be referred to the ODH. 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.

10. The ODH will evaluate the request within the 2nd 28 day period and will either:

- a. Tolerate the risk and provide an Operational Dispensation, or
- b. refer the risk to the SDH for consideration.

11. 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).

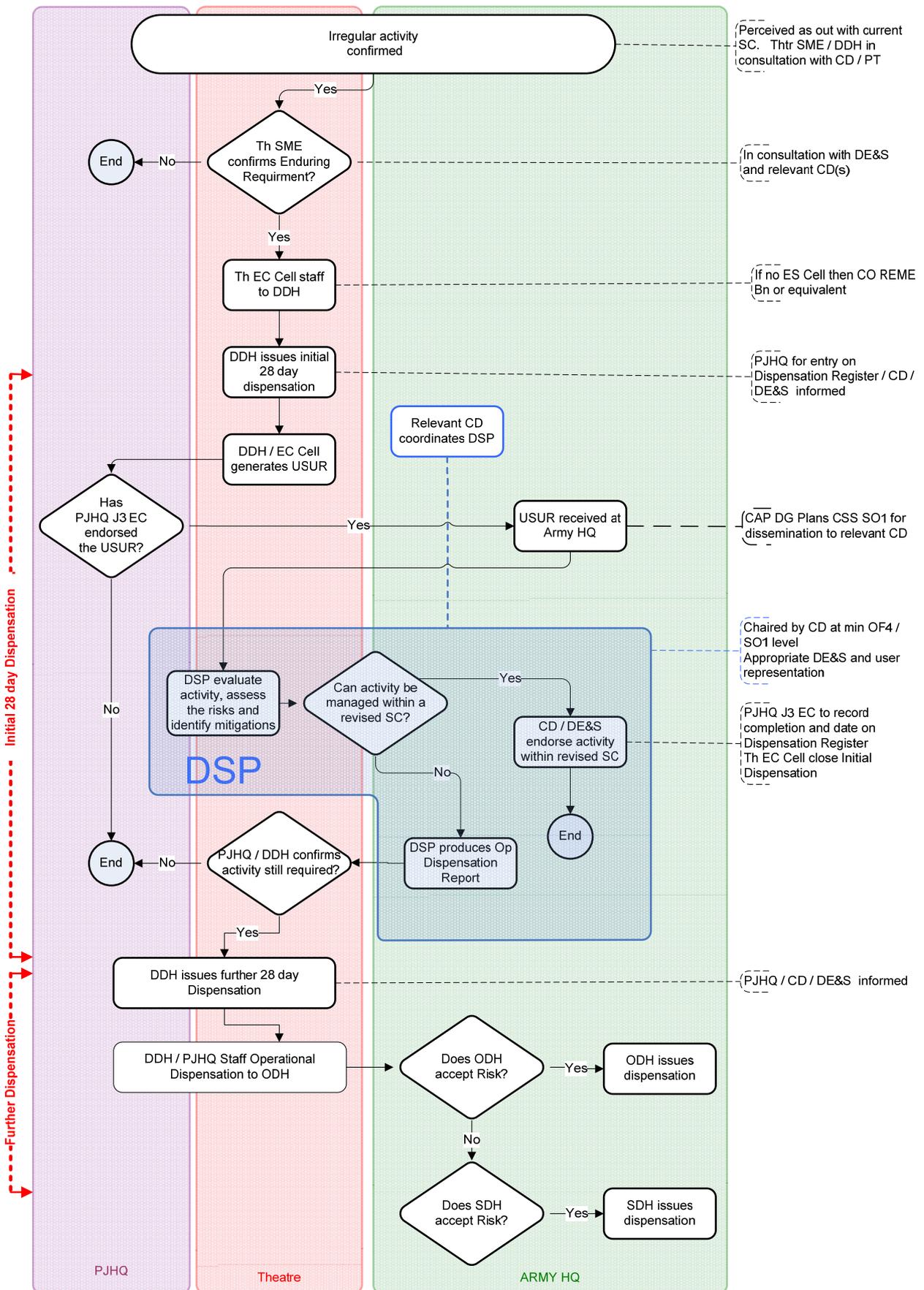


Figure 5: Operational Risk Referral and Dispensation Process.

RISK REFERRAL

12. **General.** The Military imperative may exceptionally demand that personnel are exposed to levels of risk that, in civilian life, would be considered unacceptable. 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 risks that breach legislation this authority lies at Ministerial level delegated to Dir DSEA⁶³, except where National Security is not an element of the exemption clause, which remain with the Minister. This annex 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 operations. This document describes the process for referring risks to the level at which authority lies to mitigate, tolerate or provide exemption, dis-application or derogation from legislation.

13. **Related Policy and Guidance.** JSP 454 - Land Systems Safety and Environmental Protection, specifies 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 the internal referral process.

14. **Risk Categorisation.** 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 6 below.

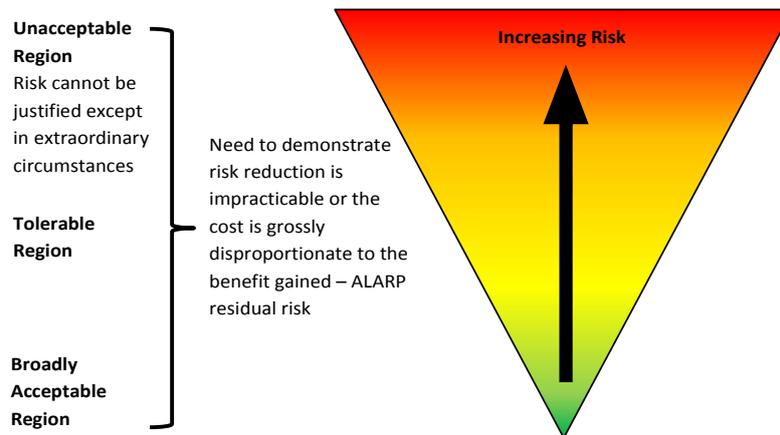


Figure 6. ALARP and Levels of Tolerability.

15. **Identification of Risk.** Risks can be identified by any stakeholder, but will usually be identified by one of the following:

- a. **Operational Dispensation Process.** Where a risk has been identified on operations and dispensation sought. Risk referral may be required to establish permanent dispensation or derogation from legislation for use of that equipment.
- b. **Review of SC.** The annual review of SC.
- c. **Investigation.** Investigation following accidents or near misses may identify safety issues that require addressing.

⁶³ DG DSA wef 1 Apr 15.

- d. **Changes in Legislation.** Where legislation changes due to new information pertaining to a risk from previous legal use, places existing equipment, or activity in breach of that legislation.
- e. **Medical.** Medical evidence may highlight a previously unknown risk which requires mitigation.
- f. **SMEs.** Users, DE&S or contractor during design, use, maintenance or disposal.

16. **Referral of Risk from DE&S.** The majority of risk cases will be in relation to equipment and will, in the first instance, be referred by the DE&S Project Safety Committee through the relevant PT to the Operating Centre Director. If DE&S cannot provide sufficient risk reduction through technical or financial resources, the Operating Centre Director will refer the risk to the Capability owner, who in the Army's case is DG Cap.

17. **Risk Referral Working Group (RRWG).** On receipt of a referred risk DG Cap will direct the appropriate CD to establish a Risk Referral Working Group to manage the specific risk. The RRWG is chaired by the relevant CD and membership of each risk specific RRWG will depend on the nature of the risk, but should include all relevant stakeholders; the RRWG, is likely to include:

- Lead Capability AD and SME desk officers
- DE&S PTL and OC Representative
- CE(A)
- DLoD Owners including, D Eqpt
- Legal
- Med
- Army Secretariat
- CESO(A)

18. **RRWG Responsibilities.** The RRWG is responsible to DG 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 is responsible for:

- a. Informing 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 risk to life or a serious risk of damage to individuals or reputation, all operation of the equipment must cease.
- b. Conducting a detailed assessment of the risk to confirm the precise nature of: the risk; potential impact of the risk; likelihood of the risk occurring; existing operational dispensations; current mitigations; an assessment of a permanent or temporary removal of the capability and the requirement to maintain the specific capability.
- c. Identifying possible measures for treating or mitigating the risk. These might include:
 - (1) Technical solutions. This may include 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. Recommendations on interim measures to mitigate the risk.

- e. Preparing the case for referral of the risk to a higher authority.
- f. Preparing the case for exemption from legislation for submission to the Land Systems Exemption Committee (LSEC).
- g. Production of guidance for future capability development.

19. **Risk Referral Process.** The Army Risk Referral Process is shown at Appendix 1 to this Annex. 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 four 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.
- c. **Withdraw the Equipment from Service.**
- 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 conforms to legislation, consideration should be given to whether an exemption from legislation is required⁶⁴. This exemption may be permanent or temporary, e.g. pending the introduction of a future capability. All exemptions from legislation are to be submitted to the LSEC as detailed in the footnote reference.

20. **Temporary or Interim Dispensation.** 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 capability is deployed on operations, this should be conducted through the Operational Dispensation and Risk Referral Process detailed below. For non-operational use of the capability this must be done at the appropriate level, and no lower than 2* level.

21. **Referral to a Higher Level.** 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 up the Chain of Command 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, e.g. 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. Within the Army TLB, the risk referral route is:

- a. 2* - DG Cap.
- b. 3* - FD&Cap.
- c. 4* - CGS (SDH).
- d. Ministerial - Secretary of State.

⁶⁴ JSP 454 Legal Compliance

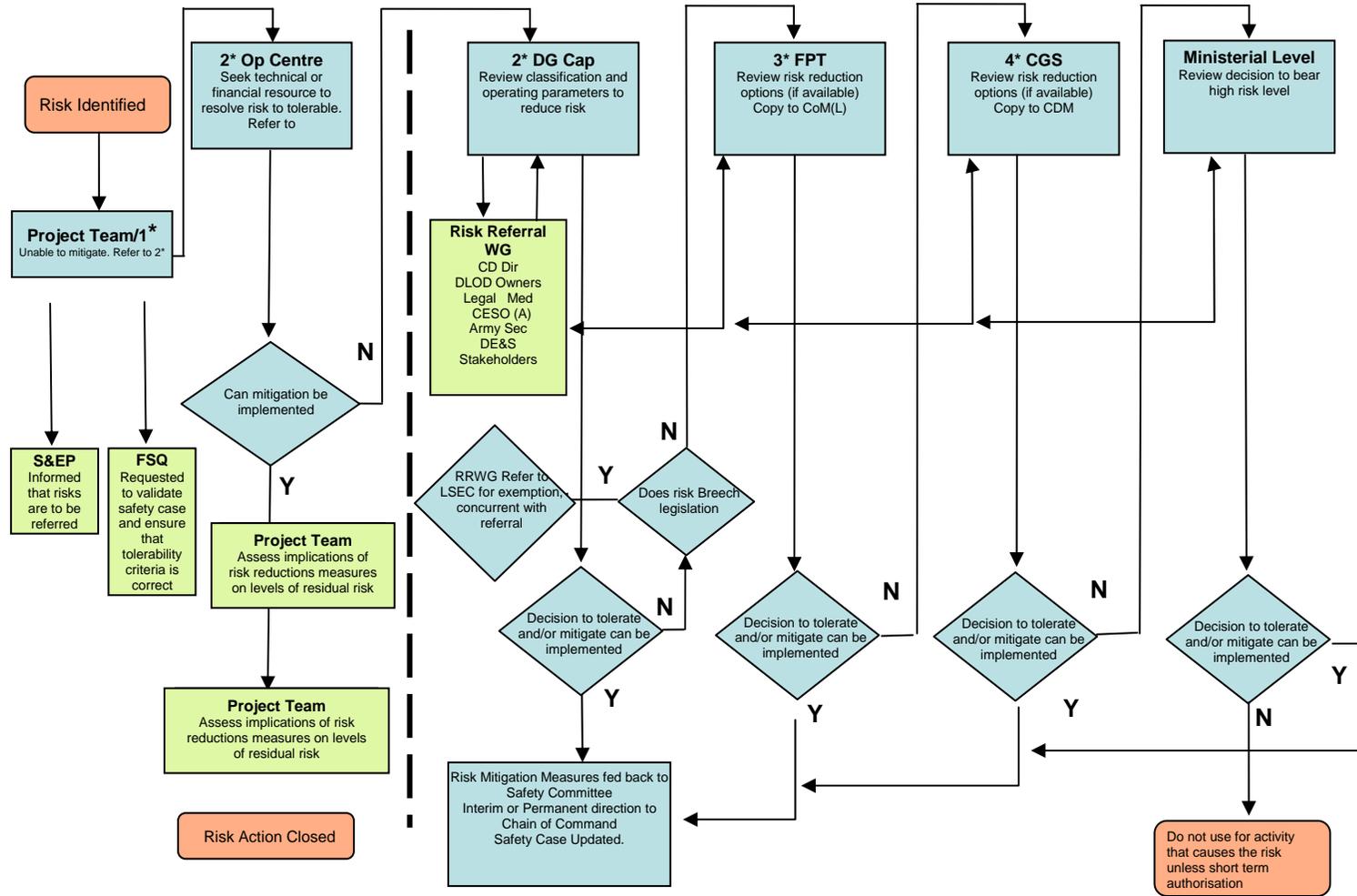
22. **Recording of Referral and the Dissemination of Decisions.** Identification and referral of risk must be recorded throughout the process. Risks should be recorded on DCRT⁶⁵ and updates provided at every stage of referral to create the essential audit trail. Where decisions are taken, they must be formally recorded through minutes/Records of Decisions from the relevant SP/RRWG and decisions disseminated to:

- a. Safety Committee, for amendment to the SC.
- b. Chain of Command, and ODH.
- c. Other relevant stakeholders.

23. **Timelines.** 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 DG 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.

⁶⁵ DG Capability Data Capture & Reporting Tool.

Army Risk Referral Process



Audit Risk and all associated work recorded on DCRT.

SAFE SYSTEM OF WORK AND TRAINING

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

a. **SSW**⁶⁶. In order to ensure uniformity of practice and clarity of implementation, all military SSW consist of a common format which is broken down into 4 parts:

(1) Safe Persons. These are those 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. This is 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 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.

(4) Safe Practice. This covers the safe conduct of any activity, including those arising from the use of the equipment, in a specific location, by competent Persons.

b. **OSSW**. Using the generic SSW format, the OSSW ensures activities are conducted on operations by trained soldiers, at ALARP, 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.

c. **SST**⁶⁷.

(1) The SST, using the generic SSW format when conducting any training activity, takes into account those under training cannot be deemed Competent, but enables the military to meet the Training Imperative set by the Operational Requirement, to ensure that personnel are provided with the best possible preparation for the roles they may undertake in times of conflict, whilst maintaining risks at ALARP by ensuring those who conduct the training are Competent.

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

⁶⁶ JSP 375 Part 1 Volume 2 Chapter 8 refers.

⁶⁷ JSP 375 Part 1 Volume 2 Chapter 40 refers.

2. This Annex is concerned with assisting Commanders with managing the balance between the risks faced and the benefits that may accrue and indicates how Commanders must integrate risk management into their planning and estimates. While the need to balance safe working practice against the Training Imperative is recognised, hazardous training and RtL activities must be managed to ensure controls are in place to make certain the risks from harm remains ALARP.

DUTIES

3. **Duty Holding.** Activities must be conducted within the DH construct. Commanding Officers as DDH, are to comply with the standards decreed for all RtL activities when authorising military training exercises/activities and when conducting operations.

4. **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.

5. Commanders who direct training/operations are to ensure that:

a. Such training/operational activity takes place in a manner that is as safe as is reasonably practicable, in accordance with current Service instructions, DCOP, 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 conducting the training, as well as those undergoing training.

c. The SSW applies to every activity, including all activity undertaken on operations. 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 deemed necessary to maintain operational effectiveness, the Commander should obtain the relevant ODH approval for the activity to take place.

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, must be subjected to further risk assessment before implementing any change. All evidence must be kept for auditable purposes.

6. **1* Commanders – Oversight.** 1* Commanders must study the submissions made by their subordinate Commanders for activities carrying significant risk that cannot be adequately controlled by the DDH. Only if the Defence imperative benefit is critical, insist that the submission is elevated to the ODH, otherwise moderate the directed training requirement to reduce the risk. 1*

Operational Theatre Commanders are permitted to authorise Operational Dispensations for a period of 28 days whilst the submission is considered by the ODH⁶⁸.

7. **2* Commanders – ODH.** The ODH must study submissions made by DDH wishing to deviate from Service instructions, DCOP, policy, regulations and directives, particularly if it involves live fire training. If the Defence imperative is crucial and they are satisfied that the risks are tolerable to them, they can approve the activity. It is only the ODH who can approve such activities.

8. **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 Duty Holder. Trainees are to adhere to any instructions supplied.

9. Generic risk assessments, together with the resultant control measure instructions are living documents. 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 or incident.
- e. If there are changes in policy that affect the activity.

10. Redundant risk assessments should be retained for 3 years.

MANAGING THE SST

11. 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.

12. **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.

13. **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.

14. **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,

⁶⁸ JSP 454 provides full details of the Operational Dispensation process.

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.

15. **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

16. 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 through age or lack of knowledge.

17. **It is not within a commander's delegated authority to deviate from 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

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

- a. To establish that where any of the elements of the SST are not in place, what are the hazards not covered and consequently what additional control measures are needed to reduce the risk to ALARP.
- 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 by the activity Duty Holder at the appropriate level.

20. A risk assessment, as set out in Appendix 1 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 Service instructions, ACOP, 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, Volume 1, Chapter 40. The methodology for carrying out Generic Risk Assessments (GRA) in military training is the same as the risk assessment process set out in Appendix 1 to this Annex and the proforma at Appendix 2 to this Annex should be used to record the GRA. Examples of GRAs are given at Appendix 3 and 4.

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 lend themselves particularly to GRAs.

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 the 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 Appendix 1.

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 DDH, 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 realised⁶⁹.
 - 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 (in support of operations), apply for a Dispensation.
 - 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.

⁶⁹ 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 ODH 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 ODH 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 the 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				

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/No Yes

Ser	Activity (Step 1)	Hazards ⁷⁰ Identified (Step 2)	Risks ⁷¹ Identified (Step 3)	Existing Controls ⁷² (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 i.e. pot holes, uneven road surface debris from road surface degradation or other road	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. 4. Seat belts are mandatory in military vehicles and have to be worn at all times.	No		

⁷⁰ Something with the Potential to cause harm.

⁷¹ Likelihood that harm will occur and its consequences.

⁷² An item, procedure or system introduced to eliminate or reduce risk.

		users.		<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> <p>4. Heat.</p>	Med	<p>1. Review necessity for detail.</p> <p>2. Enforce procedural changes for extended braking distances.</p> <p>3. Instigate a Snow and Ice plan during periods of inclement weather. (Guard</p>	No		

		5. Cold.		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 impacts with vehicle structure	Med	1. Maximum vehicle speed limit of 30 mph applies on all training areas. However, commanders are to assess the ground conditions, the obstacles to	Yes		No

		<p>/ fixtures as vehicle negotiates rough, uneven ground.</p> <p>2. Risk vehicle may rollover while negotiating severe gradients or difficult terrain.</p>	<p>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 (e.g.: 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>	
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				<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>
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**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 ⁷³ Identified (Step 2)	Risks ⁷⁴ Identified (Step 3)	Existing Controls ⁷⁵ (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		

⁷³ Something with the Potential to cause harm.

⁷⁴ Likelihood that harm will occur and its consequences.

⁷⁵ 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. 4. Non freezing cold injuries.	Med	1. Compliance with JSP 539. 2. Educate all participants. 3. Appropriate clothing. 4. Appropriate PPE (glasses, sun cream). 5. Hydration. 6. The ability to recognise the signs and symptoms. 7. Buddy buddy system.	No	1. Observe weather patterns. 2. Observe work rate during activities. 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	Yes/Low
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		
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Authorising Officer	Name	Post	Date	Signature
Existing and Additional Controls Agreed	J Smith	2IC Blankshire Regiment	12 Sep 14	<i>Original has to Signed</i>
Additional Controls Implemented	J Smith	2IC Blankshire Regiment	12 Sep 15	<i>Original has to Signed</i>

HS&EP AUDIT DIRECTIVE

1. While ownership of safety management is rightly an OPCOM responsibility, the responsibility for auditing the Fd Army, JHC and the AF and FTC Bdes with a Regional Point of Command (RPoC) and LONDIST⁷⁶ chain of command remains a Sp Comd responsibility. The purpose of this Annex is to set out what is expected of Sp Comd in this area.
2. Audit should establish that:
 - a. Appropriate management arrangements are in place and are effective.
 - b. Adequate risk control systems exist, are implemented, and consistent with the hazard profile of the organisation.
3. The Army's approach to audit is that they will be carried out on a systematic basis, in a rolling programme prepared by SO1 Audit CESO(A), in order to improve the coverage and frequency of audit. The goal will be to audit each high risk unit once per year, low risk units every 3 years, and the remainder every 2 years⁷⁷ as set out in AG's audit policy. The auditing authorities will consist of:
 - a. SO1 Audit, CESO(A).
 - b. Sp Comd SO2 SHE & SD Assurance. ARTD may exercise the right to audit those units and formations under their jurisdiction in agreement with Sp Comd.
 - c. HQ London District.
 - d. HQ BFG for Germany based units.
 - e. Firm Base (RPoC) SO2 SHE and SO3 SD.
 - f. External audit through CESO(A) enabling contract as required under CESO(A) arrangements.
 - g. All 2* Fmns will be audited by SO1 Audit CESO(A).
4. The overarching requirements for HS&EP audit are to be as follows:
 - a. Sp Comd is to ensure that OPCON units and formation HQs at 1* level within regional boundaries are audited by the RPoC at least once every 3 years. Units are to complete self-audit in the years in which they are not subjected to external audit. These self audits will not be recorded on the Army Reporting Management System (ARMS).
 - b. HQ BFG is to plan and deliver HS&EP auditing for all forces based within BFG.
 - c. Where units are considered as particularly high risk⁷⁸ then they should be audited every year. Equally, low risk units⁷⁹ may be audited every 3 years, with self-audit carried out

⁷⁶ For the purpose of this note, ARTD units will be audited under Sp Comd arrangements using regional bde audit resources, reinforced as required by CESO(A) resources.

⁷⁷ For RGR Roulement Battalions this will occur every two years to ensure each unit receives an audit during the roulement.

⁷⁸ Units such as Workshops with industrial processes, or those with substantial numbers of AFVs, Heavy B Vehicles and C Vehicles.

⁷⁹ Such as HQs or recruiting offices.

annually in those years not covered by external audit. These self audits will not be recorded on the ARMS.

e. Units and Formation HQs are not to be audited within 6 months of deploying or recovering on operations, when their command elements and 50% or more of the unit is recovering/is to deploy.

f. Units who have been audited and failed are to be re-inspected after 6 months, or when the next window of opportunity reasonably occurs if the unit is recovering from/deploying on or recovering from operations.

g. An audit programme/forecast is to be maintained by your H&S advisers, monitored at AD level and reviewed at management/command board level. It should present a forecast of audit over a 5 year period, from the point of publication, but in detail over the subsequent 12 months, and should incorporate external audits provided by CESO(A) resource where appropriate.

h. Audit scores are to be reported by the Firm Base advisers to the OPCOM chain of command, and to CESO(A).

5. Where the HS&EP functional chain is unable to achieve the criteria above without detriment to other essential safety functions, within existing resources, CESO(A) will provide additional audit resources to meet the shortfall.

6. Audit scores may be reviewed periodically, generally at the Sp Comd Command Group. CESO(A) should be advised of any unit which fails at audit, and in general terms what the shortcomings are, and what is being done to help them to restore to a satisfactory standard.

7. Audit results will be briefed at Safety Committee and Board level, at all levels based on the following scoring system which will also be represented in this format on ARMS:

- a. Green. Sound system in place.
- b. Yellow. Minor adjustments required.
- c. Amber. System at risk – Fail.
- d. Red. Fail.

8. CESO(A)'s audit and first party assurance model is enhanced by the Army Inspectorate's role whose mission is to "Ensure (by checking, reporting and advising) the delivery of appropriate assurance and regulation through the Army Competent Adviser and Inspector network for all Army activity across Defence". The Army Inspectorate is resourced to conduct 'deep dive' inspection on an as required basis.