



Ministry
of Defence

de&s

Chief of Materiel (Ships)

**Ships Domain Safety &
Environmental Protection Policy
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Equipping and Supporting our Armed Forces

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3	December 2019	Updated to reflect change in 1SL and to align with Ships Domain Reorganisation

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1SL SAFETY COVENANT



As First Sea Lord, I believe strongly that our focus on fighting effectiveness is entirely complementary with our drive for safety and ensuring that we protect all our people and others from unnecessary harm. Good safety practices are proportionate to the risk and enable effective warfighting. The safety management system I lead has a focus on competence, builds risk-aware attitudes, and promotes empowered leadership based on clear communication of risks up and down the chain of command. This aids effective decision making, enables rapid adaptation, and promotes initiative.

This covenant is my promise that I am committed to these responsibilities to you, to control risks effectively and protect our people from unnecessary harm. I deliver this through a robust and properly resourced safety management system and improvement plan to continuously enhance our safety resilience across Navy Command.

This is our Navy; and our people. We are responsible for our actions; and we owe it to ourselves and especially the people we lead, to look after each other. Therefore, I ask all of you to match my promise to ensure we follow the policy and organisational arrangements set out in our safety management system and take reasonable care of the health and safety of yourself and others affected by your actions. Together, we must all be:

- **Professional.** Embrace your professional integrity and energy to seek the highest standards in your work. If you are excellent at what you do, you protect yourself and those around you from harm. Be curious; and be prepared to learn and improve every day.
- **Risk aware, but not risk averse.** Many face the risk of harm daily because of the work we are required to do and the environments in which we do it. Be confident in taking sensible risks to be operationally successful. Procedures represent accepted good practice. If you deviate from them - be prudent: understand and control the risks using sound advice when possible, such that the operational benefit justifies the remaining risk.
- **Empowered.** Effective warfighting and safety require all to be engaged and empowered. We need your initiative to win, and you to raise safety issues to protect us. Challenge and you will be heard and respected. Mistakes are an opportunity for us all to learn - be open and you will be treated fairly. All must encourage initiative and feedback, then those responsible must respond decisively so we adapt and improve.

Our collective commitment to this covenant promotes a safety culture that fulfils our duty of care and assures our credentials as a Navy protecting the people of the UK, preventing conflict and ready to fight our enemies.

1SL ENVIRONMENTAL PROTECTION STATEMENT



The sea is of vital importance to our nation and I am determined that we will minimise our harm to the oceans and the wider environment whilst enhancing our effectiveness as a fighting force.

To do this we must be aware of the changing natural world and the risks this creates for operational outputs. Our capability requirements must be clearly set to ensure we retain our ability to operate globally and in the face of expanding environmental regulation.

We must strive to support the UK's international undertakings for environmental protection and only rely on Defence exemption from legislation when it is imperative to do so. Senior operators are to be made aware of any such decisions and the associated implications for the future deployment of their capabilities.

More efficient use of energy and resources is a clear way in which we can enhance our capabilities as well as improve our environmental performance. There are other mutual gains to be made across the Naval Service and we should actively seek out and take advantage of scientific and technological advances to achieve them.



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Chief of Materiel (Ships) - Safety & Environmental Protection Policy Statement

Personnel at all levels and of all disciplines in the Ships Domain are responsible for the delivery of materiel that is “Safe to Operate”.



Safety and Environmental Protection (S&EP) is at the core of our business to deliver and support Platforms and Equipment that are “Safe to Operate.” In this context, we are not *averse* to risk - rather, we *understand and manage* it within the prevailing operational requirement. We, in Ships Domain are expected to achieve the highest levels of S&EP within the context of military operations, meet our legal and regulatory obligations and deliver our services professionally to the highest possible standard. In accordance with the CEO’s [Health & Safety Policy Statement](#) we as part of DE&S are required to provide a safe environment for our people to work in, and safe-to-operate and suitable equipment and services to our Armed Forces. The Senior Managers of DE&S -

the Chiefs of Materiel (COMs), Director Generals and Directors - are accountable to the CEO, personally and collectively, for the effective direction, delivery, monitoring, review and assurance of Health, Safety and Environmental Protection. The direction to comply with the DE&S Safety & Environmental Management System, Occupational Health, Safety and Environmental Protection and Acquisition Safety and Environmental Protection requirements is detailed in the associated CEO’s [DE&S O&A Statement](#). We are also, as part of DE&S, required to comply with all applicable environmental legislation, MOD regulation and policy. Where we have dis-applications, exemptions or derogations from legislation, we are required to maintain arrangements that produce outcomes that are, so far as reasonably practicable, at least as good as those required by UK legislation as detailed in the CEO’s [Environmental Protection Policy Statement](#). To that end I am committed to resourcing, implementing, and continually improving the safety and environmental management system that enables coherent delivery of materiel and services that are fit for purpose, safe and or minimise impacts on the environment. The lead for the ‘safe operation’ of the equipment we supply and support lies with Navy Command; while we must use our professional judgement to advise the operating community of any identified residual risk and its relevance to any given scenario, it is the operator who will make the final decision. As the principle delivery agent and service provider to the Naval Service, we are committed to fulfilling our contribution to the First Sea Lord’s Safety Pledge. In this policy statement, I have set out my expectations of the Ships Domain and have laid the ground rules for the development and improvement of S&EP management. I look to all Ships Domain personnel to implement Organisation and Arrangements to:

- **Clearly** define roles, accountability and responsibilities across the organisation and establish, measure and continually improve S&EP performance against realistic targets in accordance with the Acquisition Safety Project, ensuring staff are provided with appropriate maritime safety and environmental information and training,
- **Support** management of S&EP through visible leadership, effective policy, and allocation of appropriate resources resulting in an organisational culture that fosters safe practices, encourages effective safety reporting and enables communication and understanding throughout the organisation.
- **Encourage** and **nurture** a culture where all staff embrace safety as an inherent activity, not a separate process **and to ensure** that a ‘generative culture’ is established, recognising that no action is taken against any employee who discloses a S&EP concern, unless such disclosure indicates, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or wilful disregard of regulations or procedures.
- **Enforce** the use of common hazard identification and risk management processes that eliminate the materiel component of Risk to Life and minimises harm to the environment as far as is reasonably practical.
- **Demonstrate compliance** with regulatory and appropriate legislative requirements and standards.
- **Ensure** that enough numbers of competent personnel are allocated to implement our element of the Naval Service Safety and Environmental Management System.
- **Ensure** externally supplied systems and services meet our S&EP standards.

My commitment to you is to see that you are equipped and supported to deliver safety and environmental protection.

A handwritten signature in green ink, appearing to read 'Chris Gardner'.

Vice Admiral Chris Gardner CBE
Chief of Materiel (Ships)

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1. INTRODUCTION

1.1 Overview

- 1.1.1 The Naval Command Safety and Environmental Management System (NC SEMS) is a framework for delivering safe and environmentally sound operational effectiveness. It is a mechanism to ensure compliance with the requirements of the Secretary of State's Policy Statement [4] and Defence Safety Authority (DSA) Defence Regulations as well as our legislative obligations. In simple terms, it defines the '**What?**', '**Why?**', '**Who?**', '**How?**' and '**When?**' This document, the Ships Domain Safety and Environmental Protection (S&EP) Policy, is an integral part of this framework and enables the delivery and support of safe and environmentally sound materiel to the operator.
- 1.1.2 The Ships Domain S&EP Policy requires the OCs to develop and sustain their organisation and define the arrangements that support their delivery of 'Safe to Operate' platforms and equipment. These are to be formally documented in an Organisation and Arrangements (O&A) Statement. This document describes how Ships Domain OCs integrate with the wider NC SEMS and details governance arrangements, and reinforces, and complies, with the requirements defined at paragraph 7 of the DE&S O&A Statement [14].
- 1.1.3 When OC Directors define their organisation, due cognisance is to be afforded to ensuring that it aligns itself to enable Authorities to comply with the regulatory requirement.

1.2 Application

- 1.2.1 This Ships Domain S&EP Policy applies to the safety and environmental management of all materiel, services and activities undertaken in the development, delivery and support of Ships Domain business.
- 1.2.2 Where specific hazard areas are subject to additional control or regulatory arrangements¹, this Policy shall fully harmonise with and not contradict or replace those requirements. Responsibilities are to be clearly defined and understood; gaps and overlaps identified, and mitigating actions taken, such that the risks are effectively managed and controlled. Such areas include, but are not limited to, Aviation Safety (MAA01: Military Aviation Regulatory Publication [8]) and Explosives Safety (JSP 862 - MOD Maritime Explosives Regulations - Surface Ships & Submarines [5]).

¹ Including Defence Disapplication, Exemptions and Derogations (DED) that are the responsibility of the Defence Safety Authority.

2. ENACTMENT OF POLICY WITHIN THE SHIPS DOMAIN

2.1 Ships Domain Component of the Navy Command SEMS

2.1.1 The high-level documents that make up the NC SEMS [1][2] are illustrated at Figure 1. At each level there is a need to integrate the maritime system with those interfaces in other domains such as Weapons OC and the Joint Enablers. Not all interfaces are illustrated in Figure 1, however, where appropriate, these will be captured in subordinate documents.

2.1.2 The Ships Domain component of the Naval Service SEMS, comprises the following elements:

- Ships OCs' S&EP O&A Statement and supporting Leaflets;
- SALMO, Platform Authority, Equipment Authority and Design Authority's Safety and Environmental Management Plans (SEMPs).

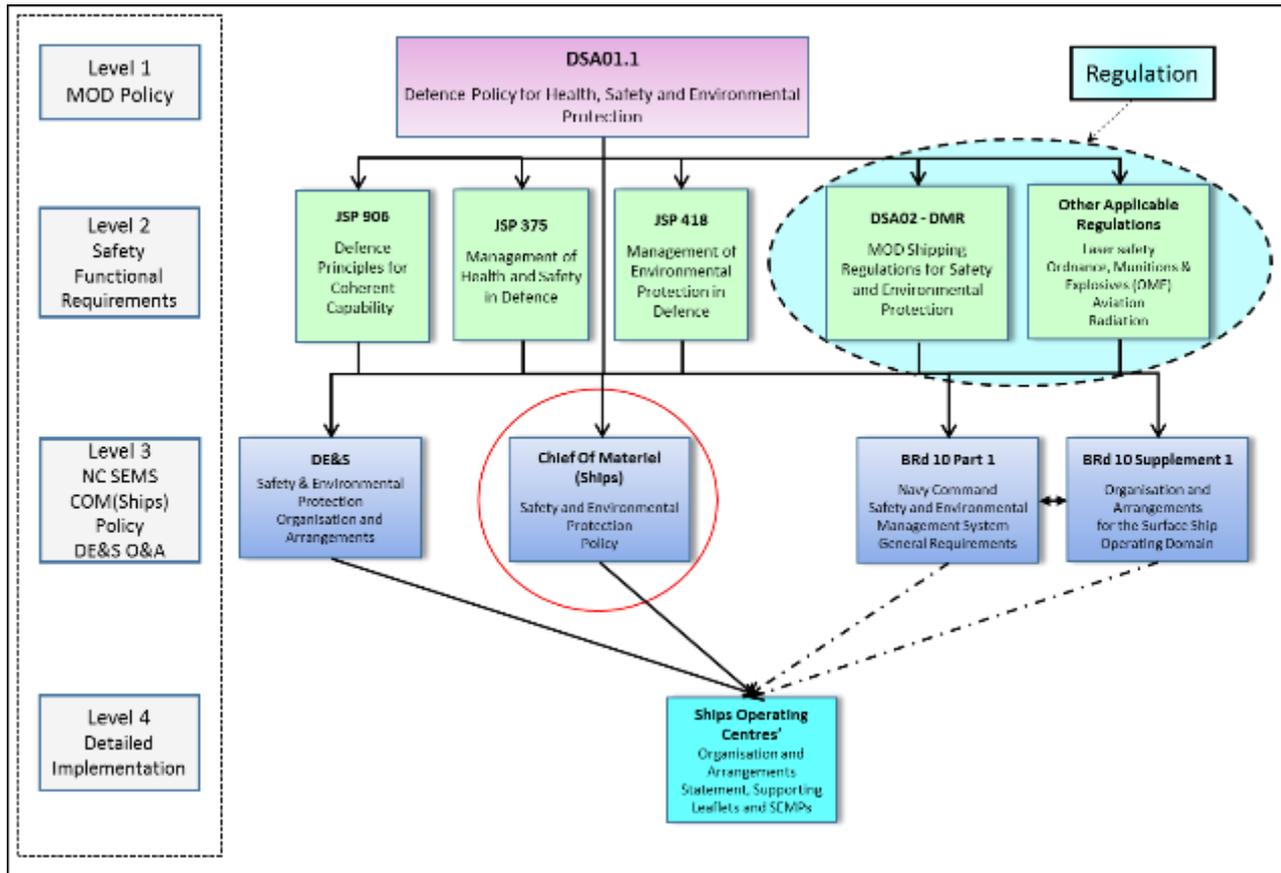


Figure 1: Policy Hierarchy

2.2 Organisation and Arrangements Statement

2.2.1 OC Directors in Ships OCs shall jointly maintain a business specific O&A Statement. Whilst the SALMO reporting line is to COM (Ships) it continues to be required to comply with the Ships Operating Centres' Acquisition Safety and Environmental Protection Organisation and Arrangements Statement.

2.3 Organisation and Arrangements Statement Content

2.3.1 The O&A Statement is to be concise and maximise the use of existing references providing the following:

- An introduction and direction by the OC Directors/Duty Holder;
- Commitment and compliance to the next hierarchal element within the Ships Domain, this in support of meeting the requirements of the overarching NC SEMS;

- c. Cross-reference to applicable policy, regulations and the Ships Domain S&EP Policy (this document);
- d. A statement of scope, authority and applicability;
- e. The organisational structure reflecting the scope of the document;
- f. The relationship and interfaces with other documents / S&EP management arrangements;
- g. S&EP responsibilities (including nominations of the accountable Platform, Equipment or Design Authority²);
- h. Identification and definition of Duty Holding responsibilities in accordance with DE&S S&EP Leaflet 09/2015 - DE&S's Contribution to Mitigating Risk to Life (RtL) across MOD [6];
- i. Identification and management of interfaces as a Duty Holder facing organisation;
- j. Identification of all regulatory interfaces;
- k. Identification of the requirement for subordinate organisations to hold and maintain a live SEMP and Certification Strategy where appropriate;
- l. Cross-reference to applicable OCs' S&EP Leaflets, Business Processes and supporting Desk Instructions where appropriate;
- m. Arrangements for audit (including audit of compliance with the approved Arrangements), assurance and S&EP performance reporting;
- n. Arrangements for the employment of Independent Safety & Environmental Auditors and the conduct of End to End assurance and auditing activities;
- o. Arrangements for escalation of both Safety *and* Environmental Protection concerns with respect to DE&S Activity, to incorporate the requirements of DE&S S&EP Leaflet 03/2011 - Equipment Safety Risk Referral [7];
- p. Arrangements for advice, review and update of the O&A Statement.

2.4 Organisation and Arrangements Statement Leaflets

2.4.1 O&A Statement Leaflets provide pan OC direction on mandated arrangements and processes to be enacted within the OCs. These Leaflets are not embodied within the O&A Statement as they address information that has the potential to be updated frequently, or where newly introduced requirements or processes are being matured. In this way, only the Leaflet will require re-issue, obviating the re-issue of the overarching O&A Statement.

2.5 Safety and Environmental Protection Information

2.5.1 S&EP information such as OCs' O&A Statement, processes, guidance and supporting documentation that enables the OCs to meet the requirements of the DSA02-DMR_MOD Shipping Regulations for Health, Safety and Environmental Protection [3], hereinafter called the 'Shipping Regulations' and other MOD policy³ and requirements will be made available and easily accessible to all stakeholders that require access to it.

2.5.2 The S&EP Information will:

- a. Provide practical guidance to those with safety accountability and responsibilities;
- b. Use consistent language and promote knowledge sharing across the Ships Domain OCs;
- c. Be bench marked against identified DE&S internal good practice to avoid the need for reinvention;
- d. Enable common practices to be developed, minimising training and induction requirements for personnel moving within Ships Domain OCs;
- e. Where appropriate, prior to implementation, comprehensively review and pilot all new processes and guidance.

² Assignments with delegated safety responsibilities have those responsibilities defined in a Safety Assignment Specification.

³ E.g. JSP 418: Management of Environmental Protection in Defence and JSP 375: Management of Health & Safety in Defence.

2.6 Ships Domain Operating Centres' General Safety Responsibilities

- 2.6.1 Everybody within DE&S has some responsibility for S&EP and, in particular, everybody shall:
- a. Know and understand their role in delivering safe and environmentally sound platforms and equipment in accordance with the Acquisition Safety Project;
 - b. Read the applicable O&A Statement and SEMP's and use the O&A Statement Leaflets ;
 - c. Work together to develop common 'ways of working' for S&EP management and support, and develop common processes across OCs where practicable;
 - d. Foster a proactive S&EP culture and aim for the continuous improvement of S&EP; and
 - e. Maintain their competence or qualifications and where shortfalls are identified ensure Delivery and Functional managers are aware and that shortfalls are mitigated.

2.7 Operating Centre Directors

- 2.7.1 OC Directors and SALMO are accountable to COM(Ships) for fulfilling their responsibilities in accordance with *The Shipping Regulations* [3], in particular OC Directors shall ensure that:
- a. Safety and environmental management is visibly and proactively led ensuring appropriate governance arrangements are in place, internal and external audit arrangements exist and are conducted, and the continuous improvement of S&EP within their OC is prioritised and achieved;
 - b. Platforms and equipment are demonstrably maintained as 'Safe to Operate' through assurance and regulation;
 - c. Appropriate assurance reporting arrangements are in place to demonstrate that outputs remain either Broadly Acceptable or Tolerable and ALARP;
 - d. A 1 Star (1*) Lead for S&EP is appointed within the Ships Domain to represent both OCs;
 - e. An O&A Statement is in place, followed, reviewed, updated and audited for compliance against the requirement;
 - f. A generative S&EP culture is fostered, that is effective and sustainable, assessing this culture using a maturity model, in accordance with the requirements detailed in Section 4.1.1;
 - g. Working together through their joint resources, to ensure commonality in approach to S&EP management and support is in place, developing common processes across OCs where practicable;
 - h. In pursuance of the Letter of Agreement with Navy Command Operating Duty Holders (ODHs), they ensure that arrangements are in place to issue and manage the acknowledgement and acceptance of Safety Authority Letters of Safety Delegation and that recipients of Letters of Safety Delegation are suitably SQEP to receive them;
 - i. A construct is in place that brings together responsibilities in line with both the DE&S S&EP Leaflet 09/2015 - DE&S's Contribution to Mitigating Risk to Life (RtL) across MOD [6] and the Shipping Regulations [3];
 - j. A Baseline of all assignments that require an Assignment Specification and a Letter of Safety Delegation is maintained and enough numbers of Suitably Qualified and Experienced Personnel (SQEP) for the effective delivery of S&EP management outputs, including where necessary, mechanisms to facilitate external support;
 - k. All assignments are reviewed at least annually and that these fully support the Duty Holders, Platform, System and Equipment Authorities in the fulfilment of their responsibilities;
 - l. Their Senior Managers ensure shortfalls in an individual's competence or qualification are identified and mitigated and that access to appropriate training and mentoring to reduce shortfalls is provided;
 - m. Where numbers of SQEP available to deliver safe and environmentally sound outputs is insufficient shortfalls will be highlighted to COM(Ships) and the ODH and interim prioritisation of work agreed;

- n. Provision is made for the planned review and update of Defence Standards (DefStans), safety documentation, processes and supporting technical publications for which they are responsible; this will ensure they are maintained as authoritative and valuable documents;
- o. Appropriate Defence Conditions (DefCons) and DefStans are explicitly identified and used to ensure safety and environmental requirements are met when placing or revising contracts. Although domain specific Regulations, JSPs or technical publications cannot be contracted against, content from them is to be used to supplement Statement of Requirements; this will enable Duty Holders, Platform, System and Equipment Authorities to conform to their wider obligations;
- p. Methodologies for the escalation of both safety risk and environmental impacts within Delivery Duty Holder (DDH), Platform, System and Equipment Authorities areas of responsibility are agreed with Duty Holders to which they are responsible, these arrangements are to be defined and clearly articulated within O&A Statements and/or SEMP;S;
- q. Arrangements are in place to manage the occupational health and safety of OC staff and contractors. These arrangements shall not duplicate extant DE&S occupational health and safety arrangements;
- r. Hazardous activities undertaken by Ships Domain staff are conducted by competent personnel who shall assess and manage risks on a case by case basis, whilst complying with additional local safety management arrangements.

2.8 Ships Domain Operating Centres' S&EP Lead

- 2.8.1 As the appointed 1* S&EP Lead for the Ships Domain, the Ships Domain Principal Engineer supports the Operating Centre Directors and is accountable to COM(Ships) for co-ordinating and reporting S&EP performance and ensuring that OCs' S&EP related concerns and shortcomings are brought to the attention of COM(Ships).
- 2.8.2 The S&EP lead shall issue, via the Ships SPfO-DepHd-Safety as appropriate, notices and leaflets, under COM(Ships)'s Authority, to communicate S&EP related information. This information, as well as this policy, OCs' O&A Statement (including supporting Leaflets) and processes shall be made accessible to both MOD staff and Industry Participants.

2.9 Ships Domain Operating Duty Holders

- 2.9.1 In accordance with the DE&S S&EP Leaflet 09/2015 - DE&S's Contribution to Mitigating RtL across MOD [6]) Director Ship Acquisition (DShip Acq) and Director Ships Support (DShip Spt) and SALMO Team Leader are appointed as Operating Duty Holders (ODH) for hazardous DE&S activities undertaken by Ships Domain personnel. Further details in the Ships OCs' O&A Statement and Ships OCs' O&A Statement Leaflet 14: Defining Safety Responsibilities – Letters of Safety Delegation and Assignment Specifications.

2.10 Ships Domain Delivery Duty Holders

- 2.10.1 By virtue of their position in the command or management hierarchy and their proximity to the activity, the DDH provides for the control and supervision of the associated risk to life. The role of the DDH is to ensure that all RtL, across the DLODs, are Broadly Acceptable or Tolerable⁴ and ALARP⁵, and that, at a platform level, the ship is suitable for the task.
- 2.10.2 DDHs in the Ships Domain are appointed by the ODH in a Letter of Safety Delegation and shall fulfil their responsibilities in accordance with DE&S's Contribution to Mitigating RtL across MOD Leaflet [6].

2.11 Front Line Command Duty Holders and Risk Ownership

- 2.11.1 The underlying principle for Risk ownership across the Front Line Commands is the universal Duty of Care, which stems from statute and is aligned with the Chain of Command. However,

⁴ Defined from HSAW Act 1974 as one fatality per 1000 of population per annum.

⁵ As Low as Reasonably Practicable, a condition to be determined by a DH, reviewed on a periodic basis and recorded so that it can be justified in a court.

where complex military activities present a credible and reasonably foreseeable RtL⁶, TLBs are required to implement enhanced safety management arrangements through a Duty Holding construct which overlays a higher level of assurance and risk escalation.

2.11.2 Ships Domain Authorities are not responsible for residual risk associated with RtL, this responsibility remains firmly within the Duty Holder framework.

2.11.3 Risk owners are ultimately accountable for accepting Risks or formally defining the criteria by which others may accept risks on their behalf, this must be agreed. For example, Platform, System and Equipment Authorities may be authorised to accept Class D Risks on behalf of the Risk Owner, but this can only be done through formal agreements which must be clearly defined in Ships OC O&A Statement and NC SEMS and communicated within SEMP.

2.12 Other Front Line Command Operating Duty Holders

2.12.1 Although Navy Command is the principal customer for Ships Domain OCs, other Duty Holders are also supported by DE&S Maritime OC projects (e.g. Army 2* ODH). Arrangements for supporting these ODHs shall follow, as far as practicable, the model established by Navy Command, unless alternative defined and agreed arrangements are in place. Any requirements are to be formally captured in the issue of a Letter of Agreement, or equivalent, between the ODH and the respective OC Director. Each relevant Safety Authority's SEMP is to identify interfaces and dependencies with these stakeholders and define how S&EP requirements are satisfied.

⁶ Risk to Life includes those risks where the Consequence Definition from the Ships Common Risk Classification Matrix is Major or worse.

3. SHIPS DOMAIN GOVERNANCE ARRANGEMENTS

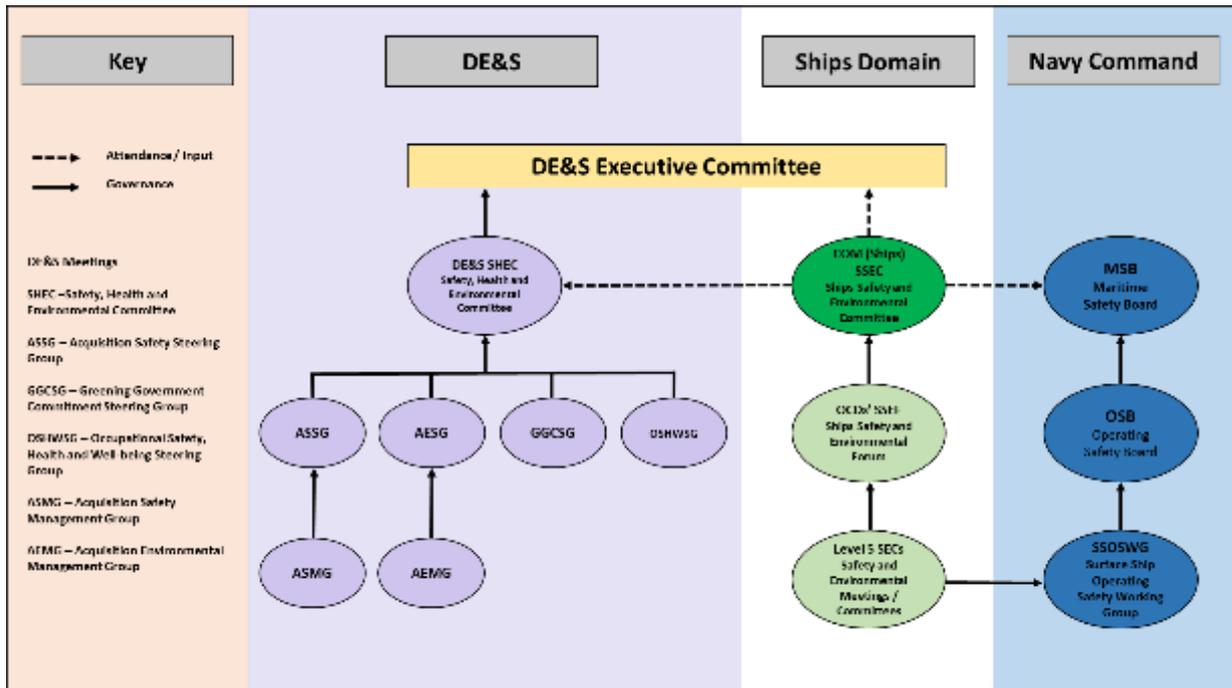


Figure 2: Ships Domain Governance Arrangements

3.1 Ships Domain Governance Arrangements

3.1.1 Ships Domain governance arrangements are illustrated in Figure 2, these are further defined in the following paragraphs.

3.2 Ships Operating Centres' - Ships Safety and Environmental Committee

3.2.1 The Ships Safety and Environmental Committee (SSEC), held tri-annually, is the senior Ship Safety and Environmental focused executive committee that feeds up to the DE&S Safety Health and Environmental Committee (SHEC) and to the Maritime Safety Board (MSB). Its purpose is to support COM(Ships) execution of his lead role for Ships Safety and Environmental governance within DE&S and present the OCs Directors and other strategic stakeholders with the opportunity to influence the strategic decision-making process. The purpose of the SSEC is described in the SSEC Terms of Reference (ToRs) [11].

3.3 Ships Operating Centres' - Ships Domain Business Review

3.3.1 The Ships Domain Business Review (SDBR), held every month, is chaired by COM(Ships). It comprises the Chief Operating Officer (COO) and OCs Heads, with non-executive membership extended to Navy Command and Submarine Delivery Agency representatives as appropriate.

3.3.2 The principle is that the SDBR is themed and primarily outward facing such that it is used chiefly for discussion of strategic issues and decision making, and only addresses situational awareness when necessary. S&EP is an agenda item as required. The purpose of the SDBR as described in the SDBR ToRs [9] is to:

- Provide collective strategic direction and governance;
- Engage with key stakeholders at a strategic level;
- Make collective decisions on priorities and resourcing;
- Consider the analysis of output performance and take appropriate decisions; and
- Review significant issues of the day and direct the way ahead.

3.4 Ships Senior Executive Team

- 3.4.1 The Ships Senior Executive Team (SET) is a subset of the SDBR. It meets when appropriate and is chaired by COO to ensure that the Ships OCs operate together effectively as a business delivering all agreed outputs safely and professionally as detailed in the SET ToRs at Annex A of the SDBR ToRs [10].
- 3.4.2 The SET provides for collective decision making on key business issues, particularly those related to Performance and Risk, Assurance, People, Transformation, Planning and Financial matters.
- 3.4.3 Its secondary role is to provide the space for the SET to develop the OCs behaviours and team identity that thinks 'One-Team Ships', operate strategically, encourage natural collaboration amongst its members, and has a passion for the long term development and success of the organisation.
- 3.4.4 The SET provides information direct to the SDBR.
- 3.4.5 The SDBR has Occupational Health, Safety and Environment (OHSE) as a standing agenda item every month. Overall day to day management of OHSE is the responsibility of SPfO-DepHd-Safety, who sits within the Ships Domain Engineering Headquarters. The full time Domain OHSE Manager reports directly to SPfO-Safety3. Either or both officers attend the quarterly DE&S Occupational Health, Safety and Wellbeing (OHSW) Steering Group.
- 3.4.6 Within Ships Domain there is a monthly OHSE forum chaired by the OHSE Manager to assess OHSE performance, raise awareness and deliver improvements, the forum is attended by a LOHSA (Local Occupational Health and Safety Advisor) from each team and this is the routine mechanism for handling OHSE issues. Urgent OHSE matters are reported directly to the Domain OHSE Manager and SPfO-Safety3 and are dealt with immediately. Full details of the OHSE governance are contained in the Domain OHSE Organisation and Arrangements (O&A) document.

3.5 Ships Safety & Environmental Forum

- 3.5.1 The Ships Safety & Environmental Forum (SSEF), held tri-annually, is chaired jointly by DShips Spt and DShip Acq providing the opportunity to air and debate issues/concerns amongst the Platform, System and Equipment Authorities and Principal Engineers. This forum drives continuous improvements in safety management by leading and coordinating the development and implementation of coherent S&EP arrangements in the Ships OCs and its key interfaces.
- 3.5.2 The SSEF is focussed on the Ships OCs' S&EP Assurance Process [13] and reports, as appropriate, to the SSEC. It will also inform the SDBR as required. It is accountable for the advice it provides noting that accountability for the delivery of materiel safety remains with the Platform, System and Equipment Authorities as defined in Letters of Safety Delegation. The SSEF functions in accordance with the SSEF ToRs [12].

4. SAFETY AND ENVIRONMENTAL CULTURE

4.1 Culture Development & Sustainment

4.1.1 In support of the DE&S aspiration to continually improve the Safety Culture of the organisation, OC Directors shall ensure that Leaders at all levels and disciplines promote an effective and sustainable S&EP culture by:

- a. Demonstrating their own commitment to the successful implementation of the Ships Domain S&EP Policy;
- b. Actively engaging and positively endorsing implementation of Safety Improvement initiatives;
- c. Committing to the prevention of errors and where errors do occur, ensure fair investigations are conducted and when opportunities to improve are identified, that they are acted upon;
- d. Supporting the continuing professional development of Ships Domain personnel to maintain appropriate levels of S&EP competence;
- e. Participating in DE&S Safety Culture Surveys and responding to findings promptly and positively;
- f. Acting on the findings of S&EP performance and assurance reporting;
- g. Promoting a challenging and questioning culture that enhances our collective understanding;
- h. Promoting honest and open communication to ensure informed decision making;
- i. Ensuring that concerns, when raised, are listened to and that they receive appropriate attention and that feedback to the originator is provided;
- j. Avoid trying to change S&EP culture solely by changing S&EP management arrangements.

5. ARRANGEMENTS FOR THE REPORTING AND ESCALATION OF S&EP CONCERNS

5.1.1 Any member of the Ships OCs who believes that there is a safety or environmental lesson to be learnt from a recent experience, who sees that a previous lesson appears not to have been learnt and that mistakes are at risk of being repeated, or has any other concern regarding S&EP which is not covered by normal S&EP management arrangements, is encouraged to pursue the following steps:

- a. Raise the issue directly with the Manager concerned;
- b. If the Manager is not known, raising the matter is not possible, or in the reporter's view the concern is not taken seriously, then raise the matter in person, by e-mail or letter with the appropriate Delivery Team Safety Manager or Team Leader. (Anonymous reports may also be made, but inability to clarify information may limit the effectiveness of such an approach);
- c. If raising the matter with the Delivery Team Safety Manager or Team Leader is not felt appropriate, or in the opinion of the person who raised the concern the concern remains, then raise the issue directly with Ships SPfO-DepHd-Safety;
- d. If raising the matter with Ships SPfO-DepHd-Safety is not felt appropriate, or in the opinion of the person who raised the concern the concern remains, then raise the issue directly with the respective Senior Manager or Ships Domain 1* S&EP Lead;
- e. In the event that reporting the matter to the Senior Manager or Ships Domain 1* S&EP Lead does not generate a satisfactory result, raise the matter with the appropriate OC Director; and
- f. Finally, if the matter remains unresolved, report the matter to DMR⁷ and COM(Ships).

NB. The above escalation procedure has been written in relation to platform, system and equipment safety risks but equally applies to Ships OCs' staff Occupational Health and Safety. Reporting should then be via the DE&S Incident Notification Cell (DINC) system instead of NLIMS.

5.1.2 These arrangements shall also be documented in the Ships OCs' O&A Statement.

⁷ Whilst individuals are encouraged to resolve concerns with respect to S&EP through their line management chain, depending on severity or potential consequences, they may wish to notify DMR at any time.

6. ADVICE, REVIEW AND UPDATE OF THIS DOCUMENT

6.1.1 Ships SPfO-DepHd-Safety is the first point of contact for S&EP advice.

6.1.2 This document is managed by Ships SPfO-DepHd-Safety on behalf of COM(Ships) and will be reviewed annually and updated in accordance with any requirement identified as a consequence and use of the mandated management of change process. Additionally, a review of this document may also be enacted if there is significant Regulatory or Policy changes, or as a consequence of shortfalls identified through the Audit programme.

6.1.3 The point of contact for queries, suggestions or corrections to this document is:

DES Ships SPfO-DepHd-Safety
Birch 2a, #3220
Abbey Wood
T: 030 679 33188

7. REFERENCES

- [1] BRd 10: Navy Command Safety and Environmental Management System (Vol 1: General Requirements).
- [2] BR 10 Supplement 1: Navy Command Safety and Environmental Management System.
- [3] DSA02: DMR: MOD Shipping Regulations for Safety and Environmental Protection.
- [4] DSA01: Defence Policy for Health, Safety and Environmental Protection.
- [5] JSP 862 - MOD Maritime Explosives Regulations - Surface Ships & Submarines.
- [6] DE&S S&EP Leaflet 09/2015: DE&S's Contribution to Mitigating RtL Across MOD.
- [7] Equipment Safety Risk Referral: DE&S Safety & Environmental Protection Leaflet 03/2011.
- [8] MAA01: Military Aviation Regulatory Policy (MRP).
- [9] 20150821 - Ships Domain Business Review Terms of Reference.
- [10] 20150821 - Ships Domain Business Review Terms of Reference, Annex A - Ships OCs' Senior Executive Team (SET) Terms of Reference.
- [11] Ships Safety and Environmental Committee, Terms of Reference.
- [12] Ships Safety & Environmental Forum (SSEF) - Terms of Reference.
- [13] Ships OCs' Organisation and Arrangements Statement Leaflet 16 – Ships Domain Safety and Environmental Assurance Process.
- [14] DE&S Organisation and Arrangements Statement for Health, Safety and Environmental Protection.