

ANNUAL REPORT ON SAFETY, HEALTH AND ENVIRONMENTAL PROTECTION IN MOD 2004/5

1 MOD is committed to ensuring the health, safety and welfare of all members of HM Forces, civilian employees of the MOD, contractors and the public, and to protecting the environment. It recognises that the effective delivery of sustainable defence capability requires high standards in safety and environmental performance to provide a safe and healthy workplace and protect defence assets. The Secretary of State's Policy on Safety, Health and Environmental Protection in the Ministry of Defence [http://www.mod.uk/linked_files/dsc/sospolstatementsigned.pdf] contains details of strategic principles and governance arrangements.

SIGNIFICANT RISKS AND MITIGATION STRATEGIES

Safety Culture

2 Overall, systems and processes are in place to implement safety and environmental policies. The new Secretary of State's Policy Statement has moved the Department as a whole beyond just compliance to embed continuous improvement in safety and environmental performance.

3 There are areas of MOD's approach to safety and environmental management that require further development. These include clarity about roles and responsibilities, and the risk identification and evaluation process. Attitudes and behaviour are key to improving safety and environmental performance: It is not about avoiding risks but about managing them sensibly and proportionately. Top level commitment demonstrates clearly and unambiguously that safety and environmental management have a critical part to play in the delivery of battle winning people and equipment.

Accident Reporting

4 Reporting of safety and environmental related incidents enables us to learn lessons, and help us to improve policies, systems and processes. In the medium term, the introduction of the Incident Recording and Information System (IRIS) in January 2008 will enable improved reporting and recording of incidents, linking subsequent investigations to the claims handling process. In parallel, a business change programme and communication strategy is being established, building on the initial success of the Army's call-centre approach and drawing on lessons learned from parallel approaches in the RN and DLO. Work is also underway to develop processes, aligned with existing systems, to ensure that safety and environmental lessons are learned quickly and communicated to those who need to know to prevent re-occurrence.

5 Road Traffic Accidents (RTAs) - In 2004, there were 13 on-duty fatalities as a result of RTAs and 49 off-duty military fatalities. The fatality figures for 2002-2004 are as follows.

Table 1 Fatalities and Injuries due to Road Traffic Accident 2002-2004

Calendar Year	2002	2003	2004
	<u>Fatalities</u>		
On Duty	12	13	13
Off Duty	55	45	49
Totals	67	58	62
	<u>Serious Injuries¹</u>		
On Duty	67	79	87
	<u>Slight Injuries</u>		
On Duty	767	714	658

¹ Data not available for off-duty injuries.

6 In the short-term, the risk is controlled by education, safety campaigns, and transport policies aimed at reducing the amount of road travel. In the longer term, statistical methods will be used to identify the underlying causes and put in place targeted measures to improve road safety performance. The risk must be managed coherently both in the UK and overseas, and both on- and off-duty – avoidable accidents in operational theatres are as unacceptable as those elsewhere.

Environmental Noise

7 The concerns of members of the public living close to military airfields, about environmental noise, may cause restrictions on military flying and therefore remain a risk to operational capability. The Aircraft Environmental Noise Study, which reported in January 2004, [http://www.mod.uk/linked_files/dsc/env/aen_report.pdf] made a number of recommendations to improve the management of environmental noise and, as appropriate, these are being taken forward and monitored through an *Environmental Noise Action Plan*. There have also been changes following the most recent RAF Review of Low Flying [<http://www.mod.uk/issues/lowflying>] and the noise implications of the Joint Combat Aircraft are being taken into account in the ongoing RAF Basing Study. But despite increasing public scrutiny of noise around civil airports and recent developments leading to the introduction of reduced noise thresholds around major airports (in the Aviation Bill 2005, currently before Parliament) military low flying remains critical to operational capability.

8 In the words of the Doug Touhig MP, Under-Secretary of State in MOD, “We believe in balancing the need to achieve our very necessary operational training objectives with the concerns expressed by the public. I assure you that it is necessary, and it is the minimum we need.”

Land Contamination

9 Land contamination as a result of past defence activities remains a serious reputational and financial risk, hence MoD is assessing the quality of its estate by undertaking Land Quality Assessments (LQAs). Where remediation is required the costs can be enormous. Despite this legacy issue, the Department can claim credit for many examples of good environmental management of the Defence estate including public access, biodiversity and landscape preservation [see http://www.defence-estates.mod.uk/about_estate/index.htm].

SAFETY AND ENVIRONMENTAL PROTECTION GOALS

10 Work is underway to develop performance targets to allow us to review safety and environmental performance and embed continuous performance improvement. We aim to link these targets with resources needed to deliver them thereby moving towards better integration with the Department's resource planning and allocation process

PROGRESS AND PLANS

11 Key initiatives and achievements over the last year were:

- Audits of RAF, Army Land Command, Met Office, Army Base Repair Organisation and Defence Procurement Agency all of which were able to demonstrate a high level of compliance with MOD policy and legislative requirements, and improved performance from their respective previous audits.
- Continuing work with the HSE to support and contribute to their 10-year Revitalising Health and Safety initiative.
- Undertaking 14 exercises to test the capability of the MOD's nuclear accident response organisations.
- Further developing the links between safety and claims to better align the risk-incident-claim cycle and ultimately reduce the cost of claims within MOD (currently running at around £80M per year).

- Setting up of a Project to rationalise MOD's extensive documentation on safety and environmental protection, aimed at making the requirements on front-line Commanders far simpler and less onerous.

CONSULTING ARRANGEMENTS

12 The Department has a complex set of consultation arrangements, varying from a cascade system of safety and environmental advisers and staff to inform and seek comments on new initiatives, legislation, and policies, to formal Management/Trades Union Committees to discuss and resolve specific issues. The Joint Health and Safety Committee between senior safety and senior union officials is the main consultation committee, but at lower levels, most sites have joint health and safety committees and Environmental Groups.

RIDDOR

13 Reportable injury rates, by HSE Category, as recorded on MOD's Accident Recording Database (CHASP) are shown in Figure 1. But we know from a comparison of fatality rates on CHASP with those recorded using other databases that there is significant under-reporting on CHASP and it is therefore difficult to draw any firm conclusions without further detailed analysis. This is underway. Furthermore, the revised Secretary of State's Policy Statement makes it clear that reporting on CHASP, and its successor IRIS, is essential if we are to learn lessons from past mistakes and improve safety and environmental management performance. We do know from more detailed analysis in support of the HSE's "Revitalising Health and Safety" initiative that the figures conceal an increased incidence of stress-related sick absence, for which we are developing a policy in line with extant HSE guidance.

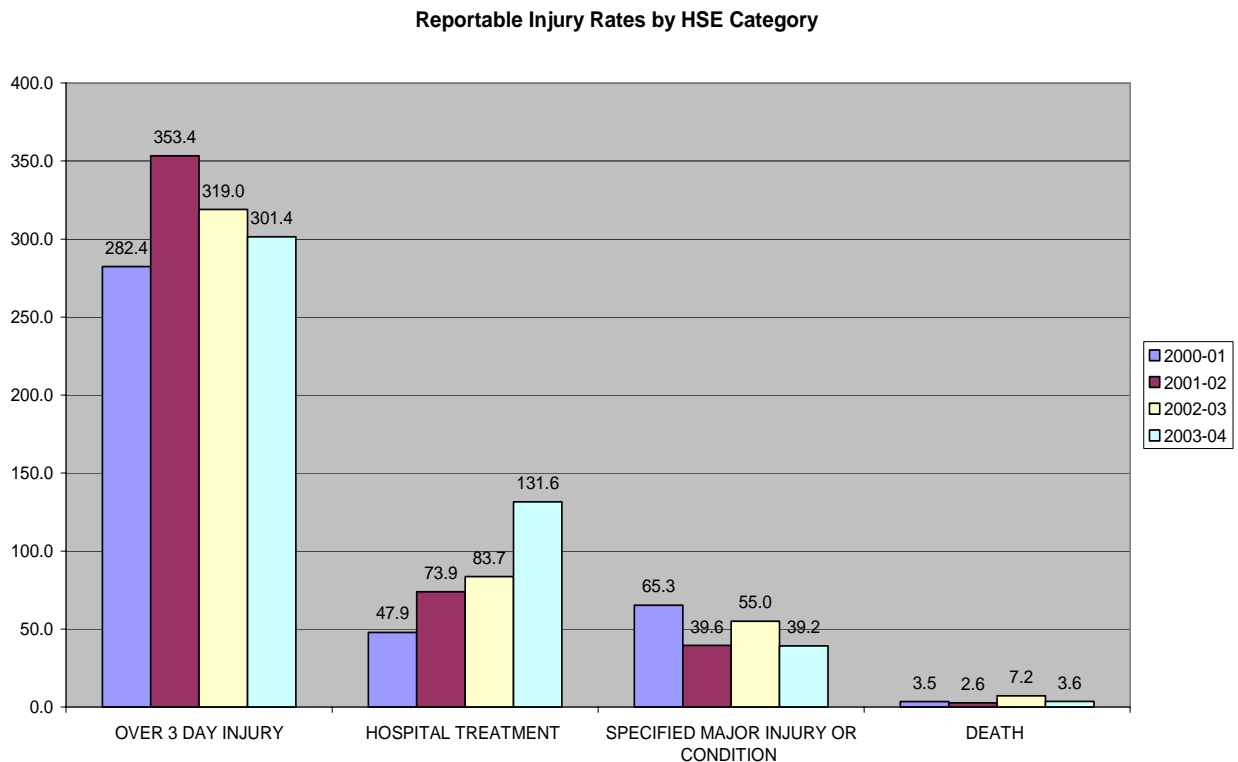


Figure 1 Reportable injury rates (per 100,000 personnel) by HSE Category Apr 00–Sept 04

FATALITIES

14 The Department's fatality and serious injury statistics reflect many of the reported safety risks. Table 2 below shows workplace related fatalities over the period 2000/01 to 2003/04 (verified data for 2004/05 are not yet available)

Table 2 Non-combat workplace -related fatalities and fatality rates per 100,000 personnel (Service and civilian)

Financial Year		2000/01	2001/02	2002/03	2003/04
Fatalities	See Note ²	22	31	28	27
Fatality Rate		7	10	9	9

15 Further detailed analysis of fatality statistics is under way with DASA better to understand the circumstances of non-combat, workplace-related fatalities and how they compare to statistics for civil sectors collated by the HSE. Direct comparisons with other employers are difficult.

CROWN NOTICES

16 Four Crown Censures³ were taken out by HSE against MOD in the reporting year.

- The first was for breaches of the Health and Safety at Work etc Act 1974 and Electricity at Work Regulations 1989 which resulted in the fatal electrocution of a contractor in MOD Main Building.
- The second was for breaches of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999, resulting in the death of a diver at the Defence Diving School in Portsmouth.
- The third was for breaches of the Health and Safety at Work etc Act 1974, which resulted in the death of an Army recruit in a caving incident during Leadership training. All three censures were accepted by MOD and have resulted in improvements to systems, processes and working practices.
- The fourth was for breaches of the Health and Safety at Work etc Act 1974, which resulted in the death of a Royal Marine recruit at Commando Training Centre Lympstone.

17 In addition to the Crown Censures, 2 Crown Improvement Notices were also taken out by HSE in the reporting year: no prohibition notices were raised in the year.

² Deaths are for Service and civilian personnel, including 'on duty' deaths both at home and abroad, but excludes: deaths recorded as 'off duty' for Service personnel; Service personnel killed in action or from wounds sustained in action; deaths recorded as suicide or open verdict; and injury related deaths where it is not known if they occurred on or off duty.

³ Crown censure is an administrative procedure, whereby HSE may summon a Crown employer to be censured for a breach of the Act or a subordinate regulation which, but for Crown Immunity, would have led to prosecution with a realistic prospect of conviction.