

# LEAFLET 58 MANAGING SAFETY AND ORGANISATIONAL CHANGE



# **AMENDMENT RECORD**

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## **LEAFLET 58**

## MANAGING SAFETY AND ORGANISATIONAL CHANGE

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## **Foreword**

This leaflet is published under the authority of the Chairman of the Defence Occupational Health and Safety Board (OHSB). This leaflet is for application across all areas of MOD and the Armed Forces.

#### 1 Introduction

- This Leaflet provides guidance on the arrangements that should be followed to reduce the risk of compromising health and safety following organisational change.
- 1.2 For the purpose of this leaflet an organisation can mean an establishment or a business area, and organisational change can mean any changes affecting the structure or range of duties currently carried out. This may include mergers, organisational restructuring, transfers of staff or changes to staffing levels and changes to roles and responsibilities. The guidance should be considered regardless of whether:
  - The management of health and safety is not directly affected by the proposed change.
  - The purpose of the change is to improve health and safety.
- 2.3 This leaflet principally concerns significant changes to an organisations structure. However, the guidance it contains may also be adapted to any type of change regardless of its size or nature.

### 2 Responsibility for Maintaining Safety Performance and Organisational Change

2.1 While a Project Team would normally be appointed to plan and implement the change overall responsibility would normally rest with the head of the organisation or part of an organisation affected by the change. Where however the proposal concerns the merger of organisations or parts of an organisation then responsibility should fall to the person with the final authority to approve the proposal.

#### 3 **Preparatory Steps**

- 3.1 When introducing any organisational change the depth and degree of the actions that need to be taken will generally be proportionate to its complexity and in making this assessment regard can be had to the following factors:
  - The scale of the hazards concerned.
  - The degree to which the change may impact on the management of those hazards.
  - The numbers of staff affected by the change.
  - The need for organisational relocation.
- 3.2 Consideration should always be given to appointing a competent manager within the Project Team who has direct responsibility for safety issues. The seniority of the individual should reflect the complexity of the proposed change.
- Where an organisation may be subject to frequent organisational changes regard should be had to maintaining a register of those with safety responsibilities and the tasks they are required to carry out.

#### 4 Implementing an Organisation Change

- 4.1 The aim at the planning stage of an organisational change is to ensure that following the change the organisation will have the resources and competence to operate safely. This should include activities related to the following:
  - The maintenance of plant in a safe condition
  - The maintenance of a fully functioning health & safety management system
  - Safe design and plant inspection
  - Major accident prevention
  - The maintenance of an effective emergency response

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- 4.2 Arrangements should be made to involve all employees affected by the change. They have particular knowledge of their own work and how tasks are performed and should therefore be invited to take an active part in decisions. Where appropriate, contractors should also be involved in this process.
- 4.3 Arrangements must be made to ensure compliance with the Department's procedures for employee consultation including compliance with relevant legislation and the Whitley system. (See "How To" and "Policy Rules and Guidance" available on the Defence Intranet People Services Portal or contact the PPPA PSC)
- Consider the need to obtain advice from the relevant Functional Safety Boards and discipline leads.
- A Mapping procedure can be used to understand and track the details of the proposed change. This will involve;
  - Identifying all people in the existing and proposed organisations who will be affected by the change
  - Identify for the same individuals the tasks that they currently carry out and will carry out following the proposed change, including the competences required and the time needed to carry out those tasks. This should include tasks which are not part of their mainstream daily duties such as their role in emergency response.
  - Identify those tasks currently carried out by contractors or under service level agreements and similar arrangements. Identify how those tasks will be carried out following the change.
- Following completion of the Mapping Procedure an assessment should be made of the risks to safety management in the new organisational structure. This should consider:
  - Whether the current safety arrangements for that organisation are satisfactory and, if not, any shortcomings or lack of resources should be identified so that they are not replicated in the new organisation.
  - Any stress points in the existing organisation. An examination should be made of previous accidents and incidents and maintenance records. Hours of work should also be scrutinised, including records of overtime and individual exemptions from working time regulations.

- The risk of using contractors including the need to retain adequate resources to monitor the quality of their work, and the need to have contingency plans should the contractor not be able to deliver to requirements.
- The workload on individuals, and whether there are any tasks that need to be carried out simultaneously. Examine whether individuals will have sufficient authority and resources to enable them to carry out their responsibilities.
- Identify any gaps in skills and knowledge and how these will be addressed. Select suitable methods for training and plan the availability of competent trainers and assessors. Plan cover for those undergoing training.
- The increased risk of stress to employees during a period of organisational change – see also JSP 375 Volume 2 Leaflet 25 – Stress Policy.
- Assess other factors that may affect employees' reliability and competence such as poor communications, deficiencies in team working, conflicting priorities and low morale.
- 4.7 The Project Team should include in the final submission for endorsing the change any increased risks that will require action to be taken. An Implementation Plan should be drawn up which includes details of action plans, milestones, and key performance indicators that can be used to monitor the impact of the change. Where possible lead indicators should be used that measure the control of risks, such as levels of overtime, maintenance backlogs or quality of maintenance. The plan should also cover the following:
  - The arrangements under which individual posts shall take up responsibility for health and safety duties.
  - The means of introducing any alterations to the way in which health and safety duties are carried out by individual posts.
  - The means by which the necessary resources are put in place to enable post holders to take up their duties.
  - The provision of any necessary written authority for the delegation or transfer of duties.
  - The putting in place of any relevant service level agreements and/or contractual arrangements.
  - The schedule of training that will be required.
  - Clear criteria with regard to the competence levels required of individuals before the new organisation is launched.

- 4.8 An assessment should be made of the risks involved with the transition to the new organisation.
- 4.9 Where the proposed change involves the transfer of a MOD site the Project Team should ensure that arrangements are made for any documentation relating to health and safety issues to be transferred to the new Head of Establishment/Commanding Office or his nominated representative. Examples of the type of documentation are contained in Annex A to this leaflet.

## 5 Monitoring the Change and Review Procedure

- 5.1 Plans should be reviewed to ensure that exposure to risks is not significantly increased during the implementation period.
- 5.2 Consideration should be given to phasing in elements of the change wherever possible.
- 5.3 Risk assessments, including those for the period of transition should be reviewed regularly. Progress should be reviewed against set objectives and key performance indicators.
- Plans should be made to review the operation of the new organisation which should be timed to take into account any possible delayed effects of the change. Lessons learnt, including strengths and weaknesses, should be identified and used to amend the organisations change procedure.

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## SITE TRANSFER DOCUMENTATION

When a site is transferred within the Department all information should be transferred to the new owner. This should include documents relating to the following (this list is not exhaustive):

- 1. Risk registers produced to enable the MOD "4C" Control of Contractors to function -see also JSP 375 Leaflet 34.
- 2. The condition of buildings/ open spaces and their associated risks including the asbestos register and underground pipes and cable runs.
- 3. Cooling towers and water supplies including the control of legionella see also JSP 375 Leaflet 19.
- 4. Requirements and usage of utilities and energy.
- 5. Safety arrangements for the storage of hazardous materials, petrol oils and lubricants, explosives, and gases.
- 6. Tests and examinations in respect of lifting equipment see also JSP 375 Leaflet 9.
- 7. Fire protection status including Fire Safety Management Plans.
- 8. State of repair of walking surfaces.
- 9. Maintenance arrangements for machinery and equipment.
- 10. Maintenance checks for ventilation and extraction systems.
- 11. Radiation sources including their location and registration.
- 12. Emergency plans.
- 13. Agreements with organisations in respect to emergency assistance, for example in relation to spills and release of toxins.
- 14. Significant procedures that MOD require at a location (Covered by MACR).
- 15. Authority needed to operate any processes, for example incinerators.
- 16. External Inspections undertaken, for example range licenses.