0   SHOWING CONFORMANCE

0.1   Options

0.1.1   There are four options to demonstrate conformance when applying this system procedure:

   a.   Follow the defined system procedure using the recommended guidance and tools, including allowed variations and options.

   b.   Use an equivalent process and tool set generated elsewhere and document evidence of procedural equivalence.

   c.   Use a bespoke process and tool set for the project and document how the bespoke procedure achieves the objectives defined for this system procedure.

   d.   Where the procedure is considered to be not relevant, document the basis for this decision.

1   INTRODUCTION

1.1.1   This procedure describes the start up of safety management activities on a project. It identifies safety stakeholders, and legislative and other standards that need to be satisfied. The procedure also creates the key elements of the safety management organisation for the project.

1.1.2   In normal circumstances this procedure would be applied at the outset of a project, early in the Concept phase. However, it can be applied at any point of the life cycle where it is necessary to initiate a formal Safety Management process on an existing system. The procedure may also be re-applied at significant points in the life cycle (eg after Main Gate approval), to review and update the project safety arrangements and ensure that they continue to be appropriate.

1.1.3   This procedure assumes that the IPT Leader has already been appointed and has been assessed as having appropriate competence in Safety Management to receive Safety delegation defining his responsibilities for Safety.

2   PROCEDURE OBJECTIVES

2.1.1   The purpose of Safety Initiation is to ensure that the Safety Management process is commenced on a firm basis by identifying basic information, interfaces and responsibilities. These include:

   a.   Stakeholders (including industry);

   b.   Regulators and Approval Authorities;

   c.   Project Safety Manager;

d.   Independent Safety Auditor if appropriate;

e.   Safety Committee;

f.   Project Safety RACI;

g.   Lead FSMO.

3   RESPONSIBILITIES

3.1   Accountability

3.1.1   The IPTL is accountable for the completion of this procedure.

3.1.2   The IPTL is required to appoint a Safety Manager (or a joint Safety and Environmental Manager) with appropriate competency in Safety Management, but ultimate responsibility for setting up the safety organisation remains with the IPT Leader.

3.2   Procedure Management

3.2.1   The IPTL may delegate the management of this procedure to a member (Safety Manager) or members of the IPT.

3.3   Procedure Completion

3.3.1   The IPT Safety Manager(s) should identify the legislation, regulators and approval authorities that the project will need to satisfy, and any requirements for independent safety certification.

3.3.2   The IPT Safety Manager(s) should maintain a legislative register as an integral part of the Safety Case for each project.

3.3.3   The internal and external auditors should check for legal and policy compliance as part of their assessment of the Safety Management System, Safety Management Plan and Safety Case. It should be noted that responsibility for compliance still rests with those with delegated responsibility rather than with the auditor.

3.3.4   The various Functional Safety Management Offices (FSMOs ie Ship, Land, Airworthiness, Ordnance, Nuclear) will assist IPT Leaders in identifying those acquisition programmes that have potential safety implications.

4   WHEN

4.1   Initial Application

4.1.1   In an acquisition programme, the procedure should be carried out early in the Concept Phase. Stakeholders, system boundaries, supporting systems/arrangements, and relevant Regulator(s) and Acceptance Authorities need to be identified as early as possible to support the subsequent Preliminary Hazard Analysis activity (Procedure SMP04 – Preliminary Hazard Analysis) and the preparation of Project Safety Plan.

4.1.2 The procedure can also be applied at any point of the life cycle where it is necessary to initiate a formal Safety Management process.

4.2 Review

4.2.1 The registers of stakeholders and requirements should be reviewed and updated after Initial and Main Gate as part of the review and update of the Project Safety Plan.

5 REQUIRED INPUTS

5.1.1 The Procedure may use the following reference inputs, as available:

a. User Requirements Documentation (for Acquisition Programmes);

b. Any other information on the proposed functionality, use, support and context of the proposed system;

c. Existing Hazard Logs for existing similar systems;

d. Relevant MOD Publications including:

    i. JSP430 MOD Ship Safety Management;

    ii. JSP454 MOD System Safety and Environmental Assurance for Land Systems;

    iii. JSP518 Regulations for the Naval Nuclear Power Programme;

    iv. JSP520 Ordnance, Munitions and Explosives Safety Management System;

    v. JSP553 Military Airworthiness Regulations;

    vi. DEFSTAN 00-56 Safety Management Requirements for Defence Systems;

    vii. DS&E Safety and Environmental Management Instructions;

    viii. CDM's Organisation and Arrangements for Environment and Safety Management;

    ix. Defence Aviation Safety Management System (DASMS);

6 REQUIRED OUTPUTS

6.1.1 The Outputs of the procedure will comprise:

a. Appointed Project Safety Manager and Independent Safety Auditor, if appropriate;

b. Completed **Form SMP01/F/01** - Safety Operating Environment Questionnaire;

c. Completed **Form SMP01/F/02** - Register of Stakeholder Requirements and Information;

d. Completed **Form SMP01/F/03** - Register of Safety Legislation and Other

Significant Requirements.

7 DESCRIPTION

7.1 Questionnaire

7.1.1 The questionnaire contained in **Form SMP01/F/02** - Register of Stakeholder Requirements and Information, should be completed and sent to the Functional Safety Management Office considered by the IPT to be most relevant. The FSMO will then co-ordinate future help and advice across the safety community.

7.2 Stakeholder Identification

7.2.1 A Stakeholder is anyone who will be affected by the introduction of the system and who needs to be consulted or informed about the development and fielding of the system, and anyone who contributes to the ultimate acceptance of the project. This may include Individuals or groups that:

    a.   have safety responsibilities at any stage of the project;

    b.   have safety requirements (including information) from the project;

    c.   hold safety information relevant to the project (eg other IPTs with interfacing or sub-systems);

    d.   have specialist or operational knowledge that can aid the project in achieving safety requirements.

7.2.2 As a minimum the following should be consulted:

    a.   ECC;

    b.   Equipment User;

    c.   DS&E;

    d.   ASEG;

    e.   other IPTs involved in any sub-systems of the project;

    f.   other IPTs involved with systems, projects or systems platforms with which the system/project will be closely associated;

    g.   Subject Matter Experts (SMEs) with specialist technical or professional expertise in a subject area relevant to the Project;

    h.   Relevant Safety Management Offices (via Questionnaire **Form SMP01/F/01 -** Safety Operating Environment Questionnaire and directly).

7.2.3 When Stakeholders have been identified, their contact details and involvement in the project should be recorded in the Stakeholders Register.

7.3 Identify Applicable Legislation, Standards and Requirements

7.3.1 This is the initial identification of potentially applicable safety standards and requirements (including legislation, policy and best practise standards) that may apply to the project over its lifetime. The Register of Safety Legislation and Other Significant Requirements (see **Form SMP01/F/03 -** Register of Safety Legislation and Other Significant Requirements) can be used to list and document these standards for each of the life cycle stages. A separate sheet should be used for each standard identified.

7.3.2 Note that this will be an evolving process through several stages of the project. The Preliminary Hazard Identification and Analysis procedure (Procedure SMP04 – Preliminary Hazard Identification and Analysis) will identify additional requirements, to be consolidated in the Safety Requirements (see Procedure SMP10 – Safety Requirements and Contracts).

7.3.3 Useful information sources include:

    a. Other equipment Safety JSPs;

    b. Other relevant legislation and standards for non-UK operations.

7.4 Create Project Safety Organisation

7.4.1 Ultimately, the Project Safety Management Organisation will be defined in the Safety Management Plan (Procedure SMP03 – Safety Planning). However, in advance of preparation of this document, it is necessary to set up key elements of the Safety Management Organisation, as follows:

    a. Appoint competent Project Safety Manager. (Responsibilities defined in DE&S SEMI);

    b. Appoint Independent Safety Auditor, if required;

    c. Form Project Safety Committee (membership and role defined in Procedure SMP02 – Safety Committee);

    d. Produce high level definition of other project safety responsibilities, in the form of an initial project RACI (Responsible, Accountable, Consulted, Informed) chart for the Safety Management process defined for this stage of the project.

8 RECORDS AND PROJECT DOCUMENTATION

8.1.1 Where relevant, the outputs from this procedure should feed into the following:

    a. SRD (System Requirements Document) – for any specific Safety requirements;

    b. CSA (Customer Supplier Agreement) – to document agreements on Safety information to be delivered by the IPT;

    c. TLMP (Through Life Management Plan);

    d. Safety elements of Initial Gate submissions.

8.1.2   In addition, as the competence of the Project Safety Manager is relevant to the safety assurance on the project, the evidence should be retained from the selection process that the appointed individual is competent to perform the required responsibilities.

9   RECOMMENDED TOOLS AND FORMS

9.1.1   To assist in the process, IPTs should complete a safety and environmental operating environment questionnaire shown in **Form SMP01/F/01** - Safety Operating Environment Questionnaire.

9.1.2   An initial register of Stakeholders should be developed using the format shown in **Form SMP01/F/02** - Register of Stakeholder Requirements and Information, and it should be reviewed and updated as the project proceeds.

9.1.3   An initial register of Legislative and other requirements should be developed using the format shown in **Form SMP01/F/03** - Register of Safety Legislation and Other Significant Requirements, and it should be reviewed and updated as the project proceeds.

9.1.4   The IPT must consider addressing Legislation and Similar Issues amongst Standardization issues especially when producing and reviewing the Standardization Strategy and Implementation Plan (SSIP). These issues occur throughout the life of the Project which the IPT controls These also occur when updating the *Project Standards Database* (PSDB), SSIP Annex E, and *Project Safety Initiation documents* **SMP01/F/03s** with changes in Legislation and International Agreements.

10   GUIDANCE

10.1.1   Although this is written as a safety procedure, it is recognised that at this early stage the safety and environmental processes are very similar and may be carried out together.   Where appropriate, the same formats and tools are recommended for stakeholder and legislative requirements to provide a single consistent basis for subsequent safety and environmental activities.   These tools are described here for completeness.   It is also recognised that in many projects, the roles of Safety and Environment Manager may be combined, and a single Safety and Environmental Committee may exist.

10.2   Questionnaire

10.2.1   Completion of the questionnaire (**Form SMP01/F/02** - Register of Stakeholder Requirements and Information) will enable the Functional Safety Management Offices (FSMOs) to identify the most relevant Office for advice and guidance on hazard identification, and all subsequent tasks related to that project.   FSMOs will then assign a member of their staff as the lead FSMO point of contact for all safety

and environmental matters arising from that project and to co-ordinate future help and advice across the safety and environmental assessment community.

10.3   Stakeholder Identification

10.3.1   Initially, stakeholders identified and consulted at this stage will be restricted to MOD. However, any relevant external stakeholders identified eg other Government departments, industry, research organisation, regulatory bodies etc should be logged and included in a communication plan which identifies when they should be consulted, by whom and for what purpose. The IPTL may choose to include external stakeholders at this stage.

10.3.2   Note that for projects/systems that involve a high number of stakeholders, consideration should be given to developing a project communication plan that includes contact details, information requirements, lines of communication, responsibilities and any relevant security considerations.

10.4   Identify Applicable Legislation, Standards and Requirements

10.4.1   The identification of relevant legislation at the start of any project is essential so that any conditions for compliance can be incorporated into the Acquisition process. Safety Managers are expected to identify and maintain a register of applicable legislation as part of the development of the Safety Case, and to continuously review it and revise it as necessary.

10.4.2   Within the MOD, each project's Legislative Register should be taken to include matters of Government or European Union policy, especially where these bind all UK government departments, including MOD. Recourse to law by European institutions is increasingly possible for non-compliance with European policy for public procurement.

10.4.3   The organisation uses a number of methods of enabling compliance:

a.   IPTs develop System Requirement Document (SRD) to meet User Requirement Document (URD) statements from the Equipment Capability Customer. This is an important method for advising industry of the MOD's safety and environmental requirements;

b.   The TLMP incorporates the impact of safety and environment legislation on the relevant equipment both now and in the future (The Project Safety and Environment Plans are integral parts of the TLMP);

c.   Use of DEFCONs and DEFFORMs in the development of contracts and contract conditions.

10.4.4   Where the IPT also develops the URD on behalf of the Equipment Capability Customer, it is extremely important that these reflect the DS&E safety and environmental performance objectives and targets, recognising and emphasising any politically or publicly sensitive issues. The advice of organisational Subject Matter Experts (SMEs) from the FSMOs and DS&C must be sought in the construction of

the URD.

10.4.5 Although reference to DEFCONs and DEFFORMs provides MOD with some protection, the Invitation to Tender (ITT) must explicitly describe the project's requirements for safety and environmental management, compliance and performance as result from the URD and SRD and the project's Safety Management Plan.

10.4.6 Access to information about safety and environmental legislation is enabled via a number of organisations and media – the following provides some primary examples:

a. DS&C Legislative Register. DS&C have established a list of legislative requirements which IPTs are expected to respond to. The DS&C database is available within each Safety Management Office.

b. Legislative Registers held by the FSMOs;

c. FSMO intranet pages, DS&E's Safetynet etc.

d. Websites and publications of the HSE, Professional Societies and of lawyers or consultancies specialising in providing information and knowledge of safety and environmental matters and current affairs;

e. Suppliers, contractors and consultants;

f. Other projects and IPTs.

10.4.7 Identification of and compliance with all relevant safety and environmental legalisation is always ultimately the responsibility of the IPT Leader with delegated authority.

10.4.8 Since safety and environmental legislation is continuously evolving, IPTs are strongly recommended to seek expert advice on new requirements that might be likely to come into force during the project life cycle

10.4.9 A list of approved specialist consultants is available as part of the Safety and Environment enabling arrangement, jointly managed by the FSMOs. These can be appointed by IPTs to provide expert advice and assistance. More information is available from the Knowledge Base: Home/IPTs & SGs/Support Groups/Air Land Technology Group/Safety Management/SSESA.

10.4.10 The 'compliance matrix', available from this site, shows which contractors are competent in particular areas.

10.5 Create Project Safety Organisation

10.5.1 Appointment of an Independent Safety Auditor (ISA) is advisable for projects that are complex, novel, or assessed as having high levels of safety risk. Appointment of an ISA may also be mandated by domain specific Joint Service Publications. For further guidance, refer to the AOF.

10.6 Guidance for Different Acquisition Strategies

10.6.1 The requirements for Project Safety Initiation do not change for Acquisition conducted through intergovernmental agreements, OCCAR, multilateral or collaborative programmes. It is MOD policy that the same standards are met, and that assurance that these standards have been met can be demonstrated.

10.7 Warnings and Potential Project Risks

10.7.1 If IPT Leaders fail to carry out this procedure in a timely manner, there will be delays in engaging stakeholders, recognising legislative or other requirements, or creating the safety organisation. This will inevitably result in risks to project costs and timescales.

10.7.2 If the project fails to co-ordinate the treatment of stakeholders and legislative requirements between safety and environmental management system, there is a risk that there will be inconsistent communication to stakeholders and duplication or omission of requirements (eg falling between the two).

10.7.3 The legislative and other requirements register should not be read across form one project to another, even if they are similar in scope, without a detailed review.

10.7.4 Competence of Safety Managers and Independent Safety Auditors is critical to the safety success of the project. It is important that this competence should be assured, and that records demonstrating that this has been done should be retained. If this is not done it will be difficult to demonstrate that IPT Leaders have discharged their responsibilities correctly.