CTLB- STRATEGIC RISK ASSESSMENT OF SAFETY IMPACTS OF ORGANIZATIONAL CHANGES

KEY CHANGE / ISSUE	POTENTIAL EFFECT & RISKS	ASSESSMENT OF RISK (high, med, low)	ADDITIONAL CONTROLS NEEDED	RESPONSIBILITY FOR ACTION
A.ROLES, RESP	ONSIBILITIES & PERSONNEL			
Roles, responsibilities & key activities	 Failing to identify fully how existing roles, responsibilities & key safety activities are discharged before removing or changing them Failing to clarify new roles & responsibilities (particularly where whole layers are removed and/or personnel take on substantial new responsibilities) Can result in unclear/unfilled safety responsibilities and/or loss of key safety activities 	1. This is a current issue for the CTLB. Streamlining was a prime example of change that lead to a loss of SHEP staff and where SHEP was not given sufficient consideration. No evidence that MOD policy was followed (JSP 375 Vol 2 Lflt 58). 2. SDSR, the formation of DIO, DSA, DBSO and VERS could are examples of changes that could create new gaps or exacerbate existing problems. 3. Assessment: Likelihood: High Impact: Med Overall: High	1. Further work is required to map current safety roles and responsibilities. This information should inform future decisions on the number of safety specialist needed and where they should sit. 2. Independent Review of SHEP roles within change proposals. 3. Generate register of those with Safety responsibilities.	HLB Holders, CEs, HOE, Hds of SABUs (with CESO Assistance) If MOD-Wide – SSDC If CTLB only – CESO HLB Holders, CEs, HOE, Hds of SABUs

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Training, skills & capability development	 A lack of training, skills and capability development for personnel eg staff who are more empowered Inadequate training needs analysis and competence assessment Can result in inability to discharge safety roles & responsibilities. 	1. This is a current issue for the CTLB. Latest analysis shows 10% SHEF postholders are not suitably qualified and audit evidence shows that many with secondary SHEF duties are not able to carry out their duties. 2. Training Needs Analysis done at TLB level and strategy produced showing which posts require which training. 3. Audit results show mixed implementation 4. Assessment: Likelihood: Med Impact: Med Overall: Med	1. Monitor compliance with CTLB Training Strategy. 2. Use PADR as monitoring mechanism/prompt. 3. Build in time (and funding) for necessary training and development. 4. Those planning change will need to undertake a TNA to ensure they have sufficient SQEP to meet their safety needs during and after any change programme.	HLB Holders, CEs, HOE, Hds of SABUs, LMs LMs LMs HLB Holders, CEs, HOE, Hds of SABUs, LMs

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Reductions in personnel with key competencies	Excessive reductions in personnel with key competencies Can result in inexperienced staff exposed to safety risks or them exposing others to safety risks.	1. Currently there are no gaps in SHEF posts but 10% of key personnel not qualified. 2. Larger number gapped or qualified in secondary roles. 3. Assessment: Likelihood: Med Impact: High Overall: High	 Further work is required to map current SHEP roles and responsibilities. Some of this is underway as part of DIO fact finding. Identify key posts and relevant competence (link to CTLB Training Strategy). Monitor for emerging gaps. Monitor continuing competence of postholders. Consider how TLB might better access competent advice (e.g. by sharing competent staff across the CTLB). 	HLB Holders, CEs, HOE, Hds of SABUs

B.LEADERSHIP	B.LEADERSHIP AND AUTHORITY					
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Leadership, priorities & focus	 Failure to recognise fully the importance of safety leadership and/or how this is achieved or maintained before making changes Can result in a lack of safety leadership manifested by eg lack of focus on key aspects of the safety regime, lack of visibility and/or dilution and distraction from the priority on safety, warning signs and trends not being spotted, and an ongoing, overall weakening of the systems and culture supporting safety 	1. This is a current issue for the CTLB. There is no TLB level SHEP forum. CTLB Audit Committee monitor SHEP audit reports and TLB annual reports. 2. Audits show lack of active promotion to demonstrate commitment by leadership in most areas. 3. Assessment: Likelihood: High Impact: Med Overall: Med	 Have a single CTLB SHEP Plan. Senior Managers personally active in promoting SHEP Senior Managers held to account for performance. Reward good SHEP performance. 	HLB Holders, CEs, HOE, Hds of SABUs CTLB MB		

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Operational authorisation	 Downgrading levels of responsibility and/or Duty Holders and/or authorising personnel at lower levels without adequate experience, assessment or support, and/or too quickly Can result in inability to discharge safety roles & responsibilities and/or loss of focus on, or quality of, key safety mechanisms and processes. 	1. This is a current issue for the CTLB. Examples seen where HLB Holders and HOEs etc are not aware of risks or lack of SHEP resource at lower levels. 2. Assessment Likelihood: Med Impact: Med Overall: Med	Development Duty Holder roles and responsibilities and identify key posts and provide a formal route for risk escalation. Ensure Duty Holders able to assess impact of changes.	BTLB MB, HLB Holders, CEs, HOE, Hds of SABUs

C.SAFETY MANA	C.SAFETY MANAGEMENT SYSTEMS AND CORPORATE MEMORY					
KEY CHANGE / ISSUE	POTENTIAL EFFECT & RISKS	ASSESSMENT OF RISK (high, med, low)	ADDITIONAL CONTROLS NEEDED	RESPONSIBILITY FOR ACTION		
 Safety Management System 	- Failure to understand the implications of the change on each element of the	This is a current issue for the CTLB. Streamlining has	Positive reaction to existing audit report recommendations.	HLB Holders, CEs, HOE, Hds of SABUs		
2,5 10	Safety Management System: - Policy	resulted in deterioration of safety management systems of HLBs based in Head Office. Current	2. Oversight of corrective actions	CBAC, HLB Holders, CEs, HOE, Hds of SABUs		
	- Policy - Organisation - Planning & Implementing - Monitoring - Audit & Review	weakness identified in planning, monitoring and review.	3. Continuation of audits and assurance activities post change to ensure no further slippage/measure of continual improvement.	CESO		
	- Can result in system weaknesses in one or more of the key elements for safety management	2. Current SafetyManagement Systemsare diverse andHLB/Agency specific.3. Evidence from Audits	4. Adoption of standard audit methodology for internal (HLB) and external (TLB) audits.	HLB Holders, CEs, HOE, Hds of SABUs		
		show slow reaction to change. 4. Assessment				
		Likelihood: High Impact: Med Overall: Med				

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Corporate memory	 Failure to recognise that important information (including lessons learned) is lodged with key individuals and is not retained in durable records and/or that systems are not in place to capture and retain information Can result in loss of key safety information and recurring incidents that could, and should, have been prevented. 	1. TLB is reasonably well served by Functional Safety Boards in terms of high impact hazards/activities 2. Proportionate systems in place for learning lessons form more routine activities. 3. Retention of redundant Safety Management Systems documentation is a weakness in many areas 4. Assessment Likelihood: Med Impact: Low Overall: Low	1. Develop a formal process for assessing the impact of Organisational Change post-change. 2. Ensure CTLB is included in any MOD-wide lessons learnt and provided with feedback. 3. CESO to continue to circulate lessons learnt as appropriate. 4. Implement relevant changes from lessons learnt. 5. Ensure systems are in place to implement MOD policy on the retention of SHEP documents (JSP375 Vol2 Lflt 55).	FOR ACTION HLB Holders, CEs, HOE, Hds of SABUs CTLB MB, HLB Holders, CEs, HOE, Hds of SABUs, CESO CESO HLB Holders, CEs, HOE, Hds of SABUs HLB Holders, CEs, HOE, Hds of SABUs

D.IMPLEMENTAT	D.IMPLEMENTATION OF CHANGE – PROCESS, TIMING, AND COMMUNICATION					
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Speed of change	 The adoption of unrealistic expectations about the speed of change - including failing to take account of the need for transition management and the associated resource implications Can result in confusion and declining safety performance and can also compound other effects 	1. Current issue. (e.g. formation of DIO, DSA, DBSO, projects eg BAP and SAP) 2. Assessment Likelihood: High Impact: High Overall: High	Adopt an overall Programme Management approach for all Changes within TLB. Change planners to engage with SHEP staff to ensure SHEP considerations are included at an early stage.	CTLB MB HLB Holders, CEs, HOE, Hds of SABUs		
Large scale redundancies, redeployment or internal staff transfers	 Failure to clarify the roles of departing and incoming personnel Hand-over periods insufficient to allow new or transferred individuals to acquire experience, information and skills Inadequate supervision of personnel during their induction period Can result in confusion and declining safety performance and can also compound other effects 	1. Assessment: Likelihood: High Impact: Med Overall: Med	Covered by other areas above (e.g. Training, Roles and Responsibilities, key staff etc.) Early engagement of SHEP staff	HLB Holders, CEs, HOE, Hds of SABUs		

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Communications	Failure to fully explain and justify the change to staff in simple language. Can result in resentment and resistance if the benefits to both Dept and individuals not clearly stated.	1. Current issue (e.g. with the formation of DIO & DSA). 2. Assessment: Likelihood: High Impact: Med Overall: Med	1. Clear, regular and honest communication required. Recurrent theme from MOD Your Say. 2. Ensure process in place for implementation. 3. Change planners to feed messages into HLBs.	HLB Holders, CEs, HOE, Hds of SABUs

NOTE – some of the above points are clearly related, and in some cases interconnected. But, the aim is to ensure that all are considered one way or another.