

**Accident Investigation Policy**

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| **Approved by:** | Head of Centre | **Date:** 06.02.2023 |
| **Last reviewed on:** | 06.02.2023 | |
| **Next review due by:** | 06.02.2024 or in response to any changes in legislation | |

This policy describes the investigation procedures which are required when any accident, ill health, near miss or RIDDOR reportable event occurs on or Centurions premises during the course of any work activity.

*An accident is defined as: ‘an unplanned event that causes injury to persons, damage to property or a combination of both’.*

*A near miss is defined as: ‘an unplanned event that does not cause injury or damage, but could do so’.*

Accident or incident investigation is not a means of determining fault or apportioning blame. All loss events (illness, injury, damage to property etc.) are to be investigated by trained and competent personnel.

Accident Investigation Arrangements

The purpose of any investigation is:

* to ensure that all necessary information in respect of the loss event is collated
* to understand the sequence of events that led to the loss event
* to identify the unsafe acts and conditions (immediate causes), the underlying causes and the root causes that contributed to the loss event
* Remedial actions and longer term actions will be identified, implemented, monitored and reviewed to ensure there is no recurrence of the loss event in the future.
* to enable a full and comprehensive report of the accident or incident to be prepared and circulated to all interested parties
* to enable all relevant statutory requirements to be complied with.

This policy will apply to all accidents or incidents involving employees, visitors, members of the public and contractors, both on and off site. Centurion will cooperate with employers of contractors who may be involved in any accident or incident.

The level of investigation will depend on the severity of the event (or potential severity of the event if it is a near miss).

The following action will be taken following an adverse event (Accident or Incident):

Emergency Response:

Take prompt emergency action (eg first aid / rescue)

Make the area safe (in some cases this may need to be done first).

Initial Report:

Preserve the scene and report to supervisor / manager.

Note the names of the people, equipment involved and the names of the witnesses; report the adverse event to management or designated repsonsible person who will decide what further action (if any) is needed.

(HA2 Incident Near Miss Report or Online forms)

Initial Assessment and Investigation Response:

See Guidance Below.

HA1 Form and RIDDOR reporting as necessary.

Initial Assessment and Investigation Response:

The CEO or designated responsible person on site is responsible for ensuring that accident and incident investigations are completed. The adverse event will be reported to the regulatory authority if appropriate following guidance in our RIDDOR reporting policy.

The level of detail and nature of action taken in any investigation will be proportionate to the severity of the injury or ill health, or the potential risk involved, and we will make this assessment in line with the following:

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| **Likelihood or Reoccurrence** | **Severity** | | | |
| **Trivial / Minor** | **Serious e.g., Lost Time Injury** | **Specified / Occupational Disease** | **Fatal** |
| **Certain** |  |  |  |  |
| **Probable** |  |  |  |  |
| **Possible** |  |  |  |  |
| **Unlikely** |  |  |  |  |
| **Highly Unlikely** |  |  |  |  |

***Note:*** *Remember you must consider the worst potential consequences of the adverse event (e.g., Collapse of work at height access equipment or overturning of lifting equipment may not have caused any injuries, but had the potential to cause specified or fatal injuries).*

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| **Risk** |  | **Minimal** |  | **Low** |  | **Medium** |  | **High** |
| **Investigation Level** |  | **Minimal Level** |  | **Low Level** |  | **Medium Level** |  | **High Level** |

* In a **minimal level investigation**, the relevant supervisor or line manager will look into the circumstances of the event and try to learn any lessons which will prevent future occurrences.
* A **low-level investigation** will involve a short investigation by the relevant supervisor or line manager into the circumstances and immediate, underlying and root causes of the adverse event, to try to prevent a recurrence and to learn any general lessons.
* A **medium level investigation** will involve a more detailed investigation by the relevant supervisor or manager (and/or health and safety advisor and employee representatives where applicable). The purpose being to look for the immediate, underlying and root causes.
* A **high-level investigation** will involve a team-based investigation, involving supervisors or managers, health and safety advisers and employee representatives as applicable. It will be carried out under the supervision of senior management or directors and will look for the immediate, underlying, and root causes.

Any accident or incident investigation regardless of level will follow the four recognised steps of accident investigation as recommended by the HSE and include:

1. **Gathering the information.**
2. **Analysing the information.**
3. **Identifying risk control measures.**
4. **Action plan and its implementation.**

Where necessary other agencies may become involved with the investigation (e.g. Enforcement agencies like HSE / Police) and we will cooperate with and be guided by such agencies as required.

Regardless of ownership or direction of any investigation it is always imperative that the scene of any accident or incident is isolated and preserved to facilitate the investigation. It is important that information relating to any accident or incident is collected as soon as possible following the event. The following is a list of evidence that should be considered. Please note this list is by no means exhaustive:

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| * Witness statements * Photographs * Sketches * CCTV | * Damaged equipment * Maintenance records * Previous accident reports |

Having gathered the information from these and any other relevant sources we will then analyse the information. The main purpose of accident investigation and this analysis is to establish events leading up to the accident or incident so as to identify any underlying circumstances that may have contributed to it. Ultimately, the aim is to allow suitable evaluation of the evidence gathered, which should then enable us to identify the underlying and root causes. When we have achieved this, it will allow suitable risk control measures to be identified and corrective action to be taken to prevent a recurrence of the accident or incident. We will manage any further action through action plans and allocated responsibilities as directed by the Centurion management /responsible person.

Under health and safety law, employees are required to cooperate with Centurion to allow us to meet our legal requirements. It is expected that all employees will cooperate and assist with any accident and incident investigations, to allow us to meet our legal requirements to ensure health and safety of employees and others. This includes the need to investigate accidents and incident events which arise in relation to our work activities and premises, to help us ensure health and safety and take any necessary corrective actions to prevent a recurrence. If employees or non-workers suffer an accident at work or on our site, however trivial, this should be recorded in the forms which are maintained by Centurion. The employee (or someone on their behalf) must report the accident to site management or the designated person as soon as is practicable after the event.

Records will also be kept (and reported where appropriate) of any dangerous occurrences or diseases in the workplace. All accident and incident reports (including RIDDOR reports) must be kept for a minimum of 3 years from the date produced.

Reporting of Injuries, Diseases, and Dangerous Occurrences (RIDDOR)

Centurion acknowledges and will comply with our duty under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (“RIDDOR”). In order to achieve this, we have suitable arrangements in place for all accidents and incidents to be reported as outlined in this and related policies. Managers are to ensure that all employees understand the basic requirements for accident and incident reporting and know how to report such an event. This will be outlined on induction as part of our induction training.

Any employee or non-worker is injured or involved in an incident whilst at work should report it and ensure a record is made of the event. An Online form is kept and managed by company management or designated person. The employee (or person on their behalf) must enter all relevant details in the required boxes then notify Centurion management, or designated person.

RIDDOR Reporting Responsibilities

Only ‘responsible persons’ including employers, the self-employed and people in control of work premises should submit reports under RIDDOR. Centurion management or designated responsible person (as outlined in the responsibility section of our health and safety policy), will be responsible for complying with RIDDOR and reporting any relevant event to the HSE. The list of reportable injuries, dangerous occurrences and diseases is lengthy and if any doubt exists regarding these procedures employees must consult this policy or contact company management or health and safety advisors for advice. All reports will be treated with strict confidence and their security managed accordingly. If disclosure is necessary to authorised parties, this will be monitored and controlled.

RIDDOR Reporting Methods

As outlined in this policy, all accidents and incidents in the workplace will be reported in the using our forms. These will be suitably assessed and investigated following the four-stage approach as recommended by the HSE. Accidents and incidents will be investigated appropriately by supervisors, Trust management or designated responsible persons within the organisation (as outlined in our health and safety responsibilities section). Where RIDDOR reportable events are identified they must be reported to Trust management or designated responsible person, who will notify the HSE by the following applicable methods:

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| **Category** | **Examples** | **Reporting Method** | **Reporting Timescale** |
| **Fatality** | All deaths to workers and non-workers, with the exception of suicides, must be reported if they arise from a work-related accident, including an act of physical violence to a worker. | Call the Incident Contact Centre on **0345 300 9923** (opening hours Monday to Friday 8.30 am to 5 pm). Out of hours on **0151 922 9235**. | Quickest practicable means and without delay. Followed by an online report within 10 days. |
| **Specified Injury** | The list of ‘specified injuries’ in RIDDOR 2013 includes: **a fracture**, other than to fingers, thumbs and toes; **amputation** of an arm, hand, finger, thumb, leg, foot or toe; **permanent loss of sight** or reduction of sight; **crush injuries** leading to internal organ damage; **serious burns** (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs); **scalpings** (separation of skin from the head) which require hospital treatment; **unconsciousness** caused by head injury or asphyxia; any other injury arising from **working in an enclosed space**, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours. | Call the Incident Contact Centre on **0345 300 9923** (opening hours Monday to Friday 8.30 am to 5 pm). Out of hours on **0151 922 9235**. | Quickest practicable means and without delay. Followed by an online report within 10 days. |
| **Over 7 Day Incapacitation** | Accidents must be reported where they result in an employee or self-employed person being away from work, or unable to perform their normal work duties, for more than seven consecutive days as the result of their injury. This seven-day period does not include the day of the accident, but does include weekends and rest days. | Online report form F2508 | The report must be made within 15 days of the accident |
| **Dangerous Occurrence** | Dangerous occurrences are certain, specified ‘near-miss events (incidents with the potential to cause harm.) Not all such events require reporting. There are 27 categories of dangerous occurrences that are relevant to most workplaces. For example: The collapse, overturning or failure of load-bearing parts of lifts and lifting equipment; plant or equipment coming into contact with overhead power lines; explosions or fires causing work to be stopped for more than 24 hours | Online report form F2508 | Quickest practicable means and without delay, and in any case within 10 days |
| **Occupational Diseases** | Certain diseases need to be reported where these are likely to have been caused or made worse by their work. These diseases include: **Carpal Tunnel Syndrome**: where the person’s work involves regular use of percussive or vibrating tools **Cramp of the hand or forearm**: where the person’s work involves prolonged periods of repetitive movement of the fingers, hand or arm **Occupational dermatitis:** where the person’s work involves significant or regular exposure to a known skin sensitiser or irritant **Hand Arm Vibration Syndrome:** where the person’s work involves regular use of percussive or vibrating tools, or holding materials which are subject to percussive processes, or processes causing vibration. **Occupational asthma:** where the person’s work involves significant or regular exposure to a known respiratory sensitiser. **Tendonitis or tenosynovitis:** in the hand or forearm, where the person’s work is physically demanding and involves frequent, repetitive movements **Occupational cancer:** any cancer attributed to an occupational exposure to a known human carcinogen or mutagen (including ionising radiation) **Exposure to a biological agent:** any disease (including any acute reaction requiring medical treatment) attributed to an occupational exposure to a biological agent. | Online report form F2508 | As soon as the responsible person receives a diagnosis. |
| **Non-Fatal Accidents to Non-Workers** | Work-related accidents involving members of the public or people who are not at work must be reported if a person is injured and is taken from the scene of the accident to hospital for treatment to that injury. There is no requirement to establish what hospital treatment was actually provided, and no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent. | Online report form F2508 | Quickest practicable means and without delay, and in any case within 10 days |
| **Over 3 Day Incapacitation** | Accidents must be recorded, but not reported where they result in a worker being incapacitated for more than three consecutive days. | Recorded in Online forms | No Report Required |

HSE Call Out:

The type of circumstances where HSE may need to respond out of hours are:

* following a work-related death,
* following a serious incident where there have been multiple casualties,
* following an incident which has caused major disruption such as evacuation of people, closure of roads, large numbers of people going to hospital etc.

**If the incident fits or is similar to any of these descriptions ring the duty officer on 0151 922 9235.**

Reporting Online

Centurion management or designated responsible persons at Centurion (as outlined in our health and safety policy responsibilities section) will complete the appropriate online report form which will be submitted directly to the HSE and the RIDDOR database. The report can be submitted by accessing the HSE website: <https://www.hse.gov.uk/riddor/report.htm>

If reported by designated responsible persons, Centurion management must always be informed and made aware of the event and submission of the report. Always seek advice from Centurion health and safety advisors where further guidance is needed in relation to accident investigation or RIDDOR reporting.

Record Keeping

Records will also be kept (and reported where appropriate) of any dangerous occurrences or diseases in the workplace. As with all accidents and incident reports, all RIDDOR reports must be kept for a minimum of 3 years from the date produced.