

Accident and Incident Reporting

Guidance Note

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1. Introduction

The purpose of this guidance is to provide additional and supporting information that can be used when making decisions on reporting and investigating any accidents and incidents, in line with the [EWG-HS-PM-204 - Accident and Incident Reporting](#).

It also provides some guidance on managing personal data to assist in avoiding a breach of GDPR.

2. Definitions

The definitions below are used within this Guidance Note, Process Map, SHE Assure or SHE Assure Accident and Incident Training

Accident

- An unplanned unwanted event resulting in injury, ill health or damage
- This includes acts of non-consensual violence to people at work

Near Miss Incident (non-Rail)

- An event (incident) not causing harm, but has the potential to cause injury or ill health.

First Aid Case

- Any 'one-time' treatment and subsequent observation or minor injuries such as bruises, splinters, scratches, burns, cuts, etc.

Medical Treatment Case

- A medical treatment case is any injury sustained on the job by an employee which requires medical treatment from a medical professional
- It does not include:
 - on site treatment for first aid
 - going to hospital or GP for further checks, such as x-rays, following first aid on site

No EWG Liability

- This is where an accident or incident has been recorded on SHE Assure, but following investigation determined not to be the responsibility of EWG or Business Unit

Lost Time Injury

- Work related injuries or ill health resulting in more than 1 to 6 full days incapacitation from ability to do normal work (working and non-working days). This does not include the day on which the accident occurred). Not reportable to the HSE.

Over 3 Days Lost Time (Incapacitation)

- Accidents must be recorded, but not reported to the HSE, where they result in a worker being incapacitated to undertake their normal work for more than three consecutive days.

Over 7 Day Lost time

- Incapacitation injuries include those self-reported injuries resulting in more than seven consecutive (working and non-working) days away from work (not counting the day on which the accident happened).
- Must be reported to the HSE within 15 days of the incident

Major Injury

- A work related injury specified in Regulation 4 of RIDDOR
- Must be reported to the HSE within 10 days
- Typical examples:
 - fractures, other than to fingers, thumbs and toes
 - any injury likely to lead to permanent loss of sight or reduction in sight
 - any crush injury to the head or torso causing damage to the brain or internal organs
 - serious burns (including scalding) covering more than 10% of the body
 - any loss of consciousness caused by head injury or asphyxia

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- any other injury arising from working in an enclosed space which requires resuscitation or admittance to hospital for more than 24 hours

Member of Public Injury

- Taken from the scene directly to a medical facility, with intention for a medical treatment

Dangerous Occurrence

- One of a number of specific, reportable 'near-miss' events defined within RIDDOR that must be reported to the HSE within 10 days
- Typical examples:
 - the collapse, overturning or failure of load-bearing parts of lifts and lifting equipment (excluding lifting accessory)
 - plant or equipment coming into contact with overhead power lines
 - Collapse or failure of any scaffold greater than 5m
 - Collapse of any structure involve more than 5t of material

Work-related

- An accident or incident that happens 'out of or in connection with work'. The fact that there is an accident at work premises does not in itself mean that the accident is work-related – the work activity itself must contribute to the accident. An accident is 'work-related' if any of the following played a significant role:
 - the way the work was carried out
 - any machinery, plant, substances or equipment used for the work or
 - the condition of the site or premises where the accident happened

Similarly a work place accident may not happen on EWG premises but it may involve one of our employees and should be reported and investigated

Lead Investigator

- Someone with higher level of Incident Investigation Training or significant experience

Actual Severity

- The actual outcome or extent of damage caused during an accident or incident

Potential Severity

- The assessment of the potential outcome based on the highest level of damage possible when an accident occurs from a particular hazard

For Rail Projects only

Near Miss

- An unsafe event or act specifically involving a train or On-Track Machinery

Close Call

- Anything that has the potential to cause harm. This includes the potential to:
 - Harm a person including minor, major injuries, and fatalities.
 - Harm the environment and/or protected species.
 - Damage railway infrastructure, plant, vehicles, tools, equipment, systems and information, or damage (refer to Positive Intervention Process for reporting process).

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3. Reasons for Reporting and Investigating Accidents and Incidents

Legal

There are various legal requirements that requires employers to record, investigate or report certain injuries and incidents, such as:

- Management of Health and Safety at Work Regulations 1999
 - The Regulation require employers to undertake monitoring of the preventative and protective measures and to review any risk assessment if it's thought that it is no longer relevant.
 - Following an accident or incident an investigation into what went wrong is the logical way of demonstrating this.
- Reporting of Injuries, Disease and Dangerous Occurrences Regulations 2013
 - **RIDDOR** is the law that requires employers, and other people in charge of work premises, to report and keep records of work-related accidents which cause deaths
- Social Security (Claims and Payment) Regulations 1979
 - The main purpose of this regulation is to make sure any potential claim for industrial injuries actually did occur as a result of work
 - Those who have been injured and likely to make a claim are legally responsible for ensuring the accident has been reported (i.e. the accident book entry)
 - The employer has a legal responsibility to investigate the accident occurred as reported by the employee/claimant
- Civil law
 - Under civil law, if someone has been injured or made ill through negligence, they may be able to make a compensation claim. An employer can also be found liable if someone who works for EWG has been negligent and caused harm to someone else.
 - Our Insurer expects us to record and investigate incidents
 - The fact that you thoroughly investigated an accident and took remedial action to prevent further accidents would demonstrate to a court that your company has a positive attitude to health and safety.

Financial

- Costings show that for every £1 a business spends on insurance, it can be losing between £8 and £36 in uninsured costs
- Reduce the impact of Personal Injury Claims on the organisation
- Prevent loss of reputation with Clients

Moral

- We want to prevent incidents to anyone affected by our work
- Where we have accidents and incidents, we want to learn to prevent them happening again

Eric Wright Group requirements

The EWG requirements are to investigate and record all reported accident and incidents to a suitable level and ensuring all records and personal information are secure and only available to those who need to access the information.

The primary purpose of any accident or incident investigation within the Eric Wright Group is to:

- Confirming the incident occurred as described (validating the report is accurate)
- Identifying the immediate and root causes
- Identifying any potential breaches of legal compliance or internal standards
- Implementing any preventive actions to prevent recurrence
- Demonstrating, through accurate records and supporting evidence, that the incident has been suitable investigated, approved and closed out

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By being able to evidence that the business has thoroughly investigated an incident or incident and took remedial action to prevent further occurrences, this would help demonstrate to a court that the organisation has a positive attitude to health and safety.

Occasionally an investigation maybe undertaken to assist in determining liability, usually at the request of our insurers. A request or instructions maybe received from the insurers, loss adjuster or the panel solicitors for information.

4. Accident and Incident Reporting and Notification

Good communication systems and methods are essential to effective reporting, investigation and recording of workplace accident and incidents.

The priority following any accident or incident should always be about dealing with any serious and imminent situation and/or any injuries. Once the incident is under control, it must be notified to the Business.

Experience indicates that delays in reporting and escalating accidents and incidents can result in:

- Disturbed scenes/loss of potential valuable evidence
- Inaccurate recollections of events
- Mistrust – particularly with Clients and other key stakeholders

The primary method for reporting and escalating accidents and incidents within the Group is via an App linked to the Group Accident and Incident database called '**SHE Assure**'.

The SHE Assure App can be accessed remotely by any works issued mobile device (phone or tablet) or by anyone who has downloaded the App onto their own phone. Access to the App can be established by a following the instructions from the Group Poster [EWG-HS-D-22 Positive Intervention](#)

Accidents or Incidents can also be inputted directly onto the SHE Assure system via computer. Access is strictly controlled by the Group HS Administrator and requires personnel to set up on the system and be provided login details. Access levels are based on roles.

When an entry is made via the App, or directly onto the system, there is a requirement to select the Project or area of work that the incident occurred on. Once the information has been inputted, an automatic notification is sent to Line Managers/Management Team associated with the Project and also to the Health and Safety Department. For higher risk incidents, relevant Directors also receive a notification.

The initial report made via the App or online is considered the equivalent record of the Accident Book and the Assure system complies with GDPR requirements. Once completed and submitted via the mobile device, it can no longer be seen or edited via the App.

If the person reporting an accident or incident (or reporting it on behalf of someone else) does not have the App, then reporting it via their Line Manager or other Eric Wright employee is acceptable.

Line Managers have been given access to Assure via a online portal where they can directly log an accident or incident without going through the App. They are only able to access Projects or Facilities which they are responsible for and are unable to access other records.

5. Notification of Incidents to HR

In some instances, an injury or occupational health incidents may require follow up with Occupational Health Assessment.

In any case where employees are likely to or have lost time as a result of an accident or injury, Human Resources must be notified.

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6. Accident and Incident Escalation

In some serious accidents or incidents, it may be necessary that specific personnel within the Business are made verbally aware of the situation before recording the incident onto Assure. i.e. the informing by phone the Business Unit Senior Management and Group Health and Safety.

Likewise, some Clients may have their own escalation and reporting processes which must be followed.

The reasons some accidents and incidents need to be escalated quickly vary, but will generally include one or more of the following:

- Confirmation that people are aware of an incident i.e. the Assure notification may not be immediately read by those who may need to offer support
- Support to the site based operational team
- Involvement with Enforcing Authorities
- Client management
- Decision making to determine the level of investigation

Within the Accident and Incident reporting process, the responsible Line Manager (for the employee or location where the incident occurred) is encouraged to make an initial assessment to determine the risk, which includes assessing the Potential Severity based on Low, Medium or High.

The SHE Assure system is set up to send automatic notifications to a set list of personnel, dependant on the potential severity, either:

- Low
- Medium
- High

The in house 'Accident and Incident Reporting' training provides guidance on how to initially assess the potential severity of Accidents and Incidents. Guidance will also be added to Assure so that personnel creating an entry will see the information prior to inputting.

7. Levels of Investigation

The level of any investigation and information required to be collected following an accident or incident will be based on its Actual and Potential Severity.

The below is a guide:

Low Actual/Potential Severity

- Line Manager responsible for completing record and basic investigation on Assure
- Uploaded supporting documentation to be proportional to the incident
- Operational Management responsible for approving incident and ensuring closing out of actions
- SHEQ Team monitor accuracy of categorisation/potential
- Incidents captured in statistics and reviewed as part of trending

Medium Actual/Potential Severity

- Line Manager responsible for completing record and basic investigation on Assure
- Expectation that there is supporting documentation uploaded
- SHEQ Team monitor accuracy of categorisation
- SHEQ Team available to support investigation if required and requested by operational team
- Incident is reviewed as part of trending
- Business Unit review the incidents for wider Lessons Learned at Monthly Meetings
- Business Unit MD responsible for ensuring actions are closed out
- SHEQ produce Monthly Reports to Board on open investigations

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High Actual/Potential Severity

- Line Manager responsible for ensuring initial 'Incident Record' is completed on Assure
- Managing Directors and SHEQ Director agree and appoint Lead Investigator and Investigation Team (resources)
- Independent check of the investigation
- Feedback to CEO at Board Meetings.

8. Training and awareness

Site Inductions must contain relevant information on how to report accidents and incidents specific to the site. This can be via nominated personnel or directly by individuals using the use of the App.

Initial reporting via the App is considered a basic inputting of information and requires minimal instruction which can be delivered locally by Line Manager who is familiar with the system.

HS Department will provide training to Line Managers who are required to carry out a basic level of investigation. Two courses are available:

- STF176 Logging an accident via the Assure app (1 Hr)
- STF177 Recording an accident or incident via the Assure main system (2Hr)

Training requests should be made via Training Department.

High Potential Incidents will be undertaken by personnel who have received a higher level of training in accident and incident investigation. In situations like this, an investigation team may be assembled, with one person being appointed as Lead Investigator

9. Reporting Incidents to Enforcing Authorities

All reporting to Enforcing Authorities will be undertaken by either of the respective Group H&S Department or Environmental Department.

If an enforcing officer (HSE, EA or similar) arrive on site to start an investigation, line management are advised to notify their line manager and the respective SHEQ Departments. Line managers should be helpful and should not be obstructive to any enforcing officer.

10. Client requirements and expectations

Where Clients have expectations for reporting accident and incidents, such as direct inputting onto their systems, or specified timescales for producing reports, then these requirements will need to be managed alongside Group requirements by the respective Business Unit.

11. Fair Culture

It is recognised that some employees and contractors may be apprehensive about reporting and escalating accidents and incidents, particularly those considered high risk.

Everyone should be reassured that the purpose of any SHEQ Investigation is to establish facts, contributing factors and root causes with the intention of learning lessons. This should be promoted via Inductions, Tool Box Talks and messages from Leadership Teams.

SHEQ Investigations are not undertaken to blame individuals or recommends disciplinary action.

Where there have been human errors made that contributed towards an accident or incident, the reasons for these will be established in line with fair culture guide in Appendix 1.

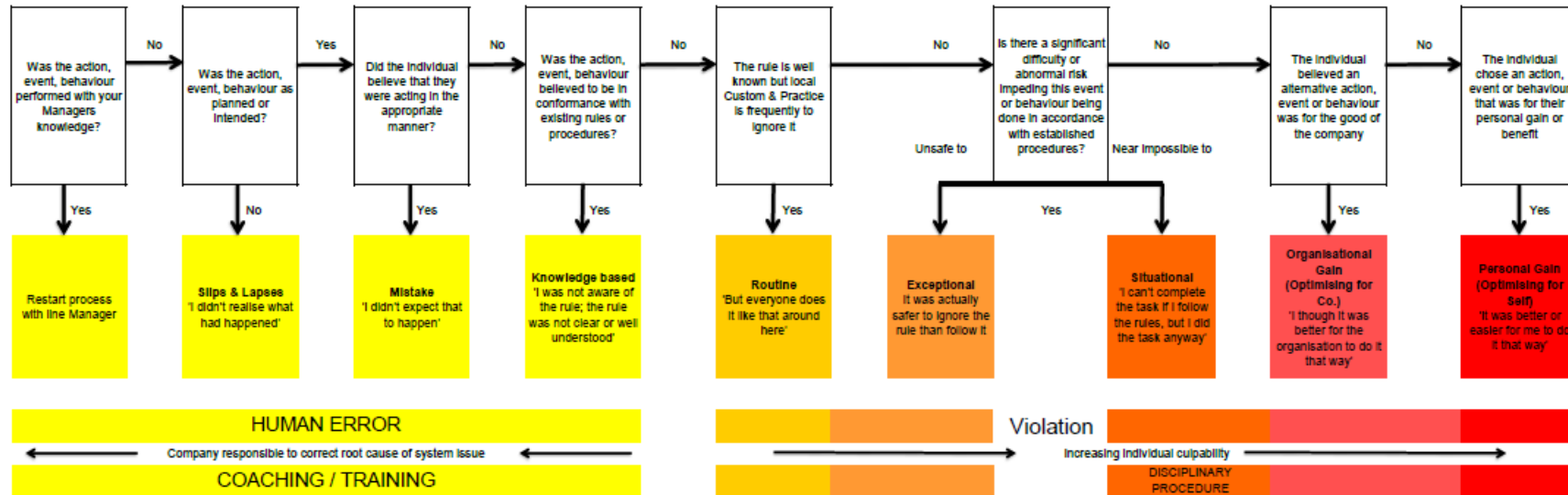
12. FAQ's

A set of FAQ's and responses are provided at Appendix 2

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Appendix 1. – Guide to a Fair Culture



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Appendix 2 - Frequently Asked Questions

Question	Answer	Further guidance
Do Eric Wright Group use an Accident Book for recording injuries?	No. EWG record all injuries directly onto a database. This is secure and contains all details that meet the legal requirements for keeping records.	Social Security (Claims and Payment) Regulations 1979
Is it a legal requirement to produce a detailed investigation report for all personal injuries?	The level of detail needed in any investigation report should be proportional to the Severity (Actual or Potential) and the potential learning opportunities. This will be covered more in the Accident and Incident Investigation Training (referred to earlier in the Guidance). Another factor that may influence the need for a detailed level of investigation is the potential likelihood of a claim. The minimum level of investigation will always include: • A validated summary of what happened – i.e. did the incident occur as described • Accurate completion of the classifications • In the case of absence, an entry indicating a return to work date • A completed Investigation section, to a suitable level • A review or the risk assessment to ensure it is still valid • A Root Cause Analysis completed (the 5 Whys) • Any suitable and relevant actions completed to address the immediate and root causes, with supporting evidence of close out	Management Regulations RIDDOR HSE Website
Why do Eric Wright Group seem to do more than is legally required?	In line with our values, Directors at Eric Wright Group want to learn from our incidents and injuries therefore we always assess the potential severity of every injury or incident. That will involve gathering facts at the earliest opportunity in order to decide what the real potential of the incident could have been and determine if there are any learning opportunities.	
If someone is hurt or involved in an incident, will they be blamed?	Every incident is unique and therefore needs to be investigated at the appropriate level. It is our belief that we need to learn from incidents and that is not possible if we discipline or dismiss individuals (including contractors) without a thorough and independent investigation. We always promote a Fair Culture.	

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