

ACCIDENT REPORTING AND INVESTIGATION POLICY

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Introduction

This policy outlines the procedures that are to be adopted when any employee, visitor or contractor experiences an accident, near-miss or dangerous occurrence on the company's premises.

It is the policy of the company to identify and investigate unplanned losses (accidents), their source and hence their underlying causes.

To enable this objective to be achieved it is imperative that all accidents, irrespective of the resulting injury or damage, be reported according to the laid down procedures.

In order to avoid misunderstanding, the company deem an accident and near-miss to be defined as –

Accident; - “any unplanned event that results in personnel injury or damage to property, plant or equipment,

Near-miss; - “an unplanned event which does not cause injury or damage, but could have done so”. Examples include: items falling near to personnel, incident involving vehicles and electrical short-circuits.

Cameo Learning Centres Ltd. Is committed investigating accidents and learning from failings to ensure continuous improvement in the safe delivery of services.

Definitions –

The definition of an **accident** in the context of this policy is as follows:

“An unplanned and uncontrolled event which has led to or could have caused injury to persons, damage to plant or other loss”.



Skills Funding
Agency



European Union
European
Social Fund

The definition of an **employee** in the context of this policy is as follows:

“Any person engaged in work for the Company whether in a paid or unpaid capacity, other than contractors”. Examples include permanent and temporary staff and work experience placements.

The definition of a **non-employee** in the context of this policy is as follows:

“Any person who receives a service from the Company or comes onto Company premises for any reason, including contractors”. Examples include customers and other members of the public.

Aims

In order to achieve continuous improvement in the safe delivery of services, Cameo Learning Centres Ltd. Aims to ensure the following:

1. That a no blame culture is established, which positively encourages the reporting of all accidents and near misses, and does not regard such reporting as an adverse reflection on the individuals abilities to perform their duties satisfactorily. However, where an investigation clearly highlights negligence on the part of an employee, appropriate action will be considered.
2. Accident investigations are seen as an opportunity to learn from failings within the organisation and make improvements in managing services safely.
3. Appropriate investigations are undertaken of all reported accidents and near misses.
4. Employees who suffer accidents are supported and helped, where appropriate, to return to good health and work.
5. Safety representatives are notified about accidents and where appropriate, involved in accident investigations.
6. Full compliance with relevant statutory provisions and in particular, the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 1995.



Areas of Action

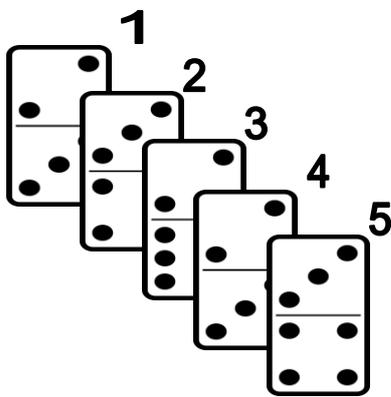
1. Employees have a responsibility to report all accidents to their managers verbally and in writing, even where no physical injury or ill health resulted from the accidents.
2. Managers should encourage the reporting of all accidents by their employees, and ensure that report forms are completed and dispatched within two days of the accident.
3. Managers must complete accident reports on behalf of employees or others that are unable to report the accidents themselves.
4. Managers must notify Company Directors immediately if an accident appears to come under the Reporting of Injuries, Disease and Dangerous Occurrences Regulations (1995)
5. Managers must notify Company Directors if employees are diagnosed as suffering from occupational diseases that could be linked to their work.
6. Managers must investigate all accidents within their responsibility (please see point 4 for guidance) in writing and consider preventative measures to prevent similar situations occurring again. Investigations must be conducted as soon as possible, and in any event, within one calendar week (7 days) of the accident. The level of management involvement should reflect the seriousness of the accident.
7. Managers must ensure that recommendations arising from all accident investigations are implemented within reasonable and agreed time-scales.
8. Manager should notify safety representatives in writing of all accidents within their areas of responsibility, and of the findings of accident investigation.
9. Where an accident is reportable to the Enforcing Authority, the aim should be to complete the full investigation within 28 days of the date of the accident. Where this is not possible, an interim report should be submitted within the 28 day period.
10. Where an accident is not reportable to the Enforcing Authority, but still requires investigation, the aim should be to complete the investigation within 2 calendar months of the date of the accident.
11. Company Directors will report accidents, where necessary, under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 to the Health and Safety Executive.
12. The Company Directors will produce accident statistics for departments to use to identify trends and so improve their health and safety management.



ACCIDENT INVESTIGATION AND REPORTING GUIDANCE

1 – Accident Causation Theory

1.1 – Accident causation theory suggests that an accident has 5 factors in a sequence that results in an injury. The sequence can be visualised as a row of dominoes set on end such that if one falls it will cause the next to fall and so on throughout the series.



- 1 Lack of management control
- 2 Basic causes (job factors)
- 3 Immediate causes (unsafe acts/conditions)
- 4 The accident
- 5 A loss, injury or effect

2 – Types of Accident

2.1 – Accidents can be classified into the following types –

- **Near miss accidents** (no injury or damage)
- **Minor accidents** (paper cuts to fingers, dropping a box of materials)
- **Lost time accidents** (time lost from work or unable to undertake normal duties)
- **Major Injury Accidents** (broken leg, amputation, dislocation of shoulder)
- **Industrial disease** (asbestosis, occupational asthma)
- **Dangerous Occurrence** (collapse of scaffold, fire stopping plant for more than 24 hours)
- **Non-employee taken straight hospital**
- **Fatality** (or fatality within 1 year from & linked to the accident)

3 – Purpose of Accident Investigation

3.1 – The purpose of an accident investigation is to identify the immediate and underlying causes of the accident and to develop and implement preventative measures to ensure that the accident does not happen again.

4 – Responsibility for Investigation

4.1 – Managers have a responsibility to investigate the following types of accidents, with assistance from the Departmental Safety Advisers, if necessary:

- Near miss accidents
- Minor accidents
- Lost time accidents
- Non-employee taken straight to hospital accidents

4.2 – Departmental or Corporate Safety Advisers, with the assistance of the Line Managers, must investigate the following types of accidents.

- Major Injury accidents
- Occupational diseases
- Dangerous occurrences
- Fatalities

5 – Accident Investigation Methodology

5.1. – When investigating accidents, managers must be detached and impartial. Personal feelings must be put aside. Assumptions, opinions, guessing must not be considered. It is important to bear in mind that the accident investigation report could become part of legal proceedings (criminal or civil) at a later date, and so subject to scrutiny. Any conclusions drawn must be based on facts.

5.2 – NORMS based analysis of information can assist with identifying facts. A fact is something which is:

- N**ot an interpretation
- O**bservable
- R**eliable
- M**easurable
- S**pecific

5.3 – The aim of an accident investigation is to discover what caused the accident and decide on preventative measures.

5.4 – A thorough accident investigation should address the following questions –

- Who was injured (and details of others involved)?
- What was the precise activity that they were doing when the accident occurred?
- How were they doing the activity (including sequence of operations; systems of work; equipment/substances use; condition & appropriateness of equipment used)?
- Why were they doing the activity (including premises/environment/weather conditions)?
- When were they doing the activity?

5.5 – Initially the investigation should focus on the immediate causes of the accident. An immediate cause is either:

- An unsafe act by the individual or 3rd party
- An unsafe condition (either equipment or environment or both)
- Or both an unsafe act and unsafe condition



Domino 3

5.6 – Having identified the immediate cause of the accident, the investigation should work back through the safety management system to identify underlying causes. Whilst not an exhaustive list, the following provides a guide to possible underlying causes:

- Non-existent or confusing guidelines/procedures
- Lack of, or poor quality protective equipment, induction arrangements, information, instruction training communication, co-operation and co-ordination.



Domino 2





- Lack of maintenance of equipment, buildings, environment
- Non existent or insufficient risk assessments
- Poor control/supervision/monitoring
- Poor planning/design, conflicting priorities, lack of time etc.
- Unclear responsibilities
- Lack of resources for policies
- Lack of commitment to policies
- Lack of relevant policies.



Domino 1

6 – Preventative Measures

6.1 – Once the immediate and underlying causes of an accident have been identified, the preventative measures and improvements that need to be implemented should be reasonably obvious.

6.2 Where preventative measure and improvements are not obvious, managers should consider –

- Brainstorming possible solutions with other managers and relevant staff groups.
- Seeking the guidance of the Departmental Safety Adviser, Corporate Safety Adviser.
- Seek the view of the Joint Health and Safety Committee and Departmental Health and Safety.

6.3 – When considering preventative measures and improvements, managers should:

- Consider any impact on, or need for, emergency procedures
- Ensure compliance with health and safety law and best practice

6.4 – Managers must monitor to ensure any preventative measures and improvements that have been identified are implemented within a defined time scale.

6.5 – Managers must monitor the impact of the preventative measures to ensure that they do not give rise to other, previously unforeseen, risks.



7 – Company’s Accident Report Forms

1 – All accidents must be recorded in the company’s accident books.

2 – These accident books will be reviewed regularly by senior management to ascertain the nature of incidents which have occurred in the workplace. This review will be in addition to an individual investigation of the circumstances surrounding each incident.

3 – All near-misses must be reported to the Safety Manager, as soon as possible so that action can be taken to investigate the causes and to prevent recurrence.

7.1 – The company will hold accident report forms for a period of 25 years in case of civil claims.

7.2 Where children have suffered major injuries as a result of accidents, Managers must send copies of key documents to the Corporate Safety Section to be held with the accident form and investigation form. This information may be required years later in civil cases. Key documents would include copies of:

- Content of induction arrangement for activities e.g. trampolining and training programmes for activities.
- Risk assessments
- Details of staff training on health and safety
- Building survey reports
- Health and Safety inspection reports etc.

8 – BI510 Form

8.1 – Managers should continue to enter details of all accidents for all workers in the accident booklet entitled “Form BI510”. This is a legal requirement under Social Security Act 1975 and the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (1995).



9 – Formal Investigations

9.1 – The Company will undertake formal investigations with the assistance of the relevant Line Managers. A recommended format for formal reports is as follows:

- Summary of injured person's details and accident details (from Company's accident report form)
- Summary of injuries
- Investigation methodology
- Background information (who, what, where, when, why)
- Account of the accident (how e.g. sequence of events, extent of damage, accident type).
- Immediate causes of accident (Domino 3)
- Underlying causes of accident (Dominoes 1&2)
- Conclusion
- Recommendations
- Appendices e.g. photographs, witness statements, etc.

9.2 – Careful thought should be given before writing individual's names into the report. The investigation report should, so far as possible, be written in third person.

10 – Feedback

10.1 – Managers should feedback, on the outcome of accident investigations, to staff that have reported accidents. This shows staff that their reports are acted upon, and will encourage further reporting of accidents.

10.2 Relevant safety representatives should be consulted on the outcomes of accident investigations.

10.3 Where there may be lessons to share, a summary of the accident report (which removes confidential information) should be discussed for cascading to other teams, sections or departments who undertake similar activities.



11 – Equalities

11.1 – Accident forms will require the ethnic origin of the injured person to be declared. The purpose of this information is to monitor and ensure that no one ethnic group is exposed to more risk than is the norm. Where monitoring data highlights concerns, remedial measures will be developed to redress the problems. The information on the accident form will be confidential.

12 – Occupational Diseases

12.1 – Where an employee is diagnosed by his/her doctor as suffering from a disease which could be linked to the employee's work, the manager must contact Company Directors.

13 – Reportable Accidents

13.1 – Please see Appendix A for the list of reportable accidents, diseases and dangerous occurrences.



ACCIDENT REPORTING AND INVESTIGATION PROCEDURE

When an accident has occurred managers should adhere to the following procedure:

- **Arrange for first aid treatment/medical care/ambulance**

- For of the injured person(s), where appropriate.

- **Evacuate and make safe the accident scene**

For example –

Turn off powered equipment

Impose a no smoking rule

Ensure people stand up wind of spillages of hazardous materials.

- **Decide on the type of accident that has occurred and identify its severity**

- Near miss and minor accidents do not require overly detailed investigations

- Detailed investigations will be required for:

- Fatality
- Lost time accidents
- Major injury accidents
- Industrial diseases
- Dangerous occurrences
- Non employees taken straight to hospital

- Inform the local safety representative

- **Isolate the scene**

- Isolate the accident scene, with barriers and signs where appropriate to keep people out if:

- Fatality
- Lost time accident or Major injury accident
- Dangerous occurrence
- Non employee taken straight to hospital

- This will protect evidence until the investigation is over

- Only allow access to the scene by Emergency Services, Law Enforcement agencies and investigators.



- Get an Overview
 - Identify and separate any witnesses
 - Get a brief overview of the situation from witnesses and victims
 - Decide whether the accident falls within one of the categories (see Appendix A) required to be telephoned immediately to the Corporate Safety Section. If so, phone through the details.
 - For serious accidents, contact the relevant Senior Manager and Departmental or Corporate Safety Adviser for support.
 - Procedures for fatalities arising from violence are covered in the Company's "Policy on Preventing Violence to Staff".



- **Interview the Injured Person and Witnesses**

- Conduct interviews as soon as possible after the accident, but do not interrupt medical care to do this.
- Interview each person separately
- Remind employees of their right to have a safety representative, trade union representative or work colleague present if they do wish.
- Interviews should not be unduly delayed while organising for a safety representative, trade union representative or work colleague to attend. It is important to gather facts while information is still clear in people's minds.
- Put each person at ease. Reassure them that it is a fact-finding process only.
- Do not allow witnesses to confer prior to the interview.
- Guard against pitfalls of:
 - Bias
 - People's perception or interpretation of events
 - Embellishment
- Do not ask leading questions e.g. "So your rushing caused you to over-reach and fall from the ladder?"
- Ask open-ended questions e.g. "What do you think caused you to fall from the ladder?"
- Ensure you have addressed the who, what, why, when, where and how
- Do not make suggestions. If the person is stumbling over a word or concept, do NOT help them
- If the person begins to offer reasons, excuses or explanations, politely decline that information and remind him/her to stick with the facts
- Summarise what you have been told and correct any misunderstandings
- Written statements should be signed and dated by the relevant witnesses.
- Statements taken on behalf of witnesses should be carefully read back to them to ensure accuracy of content.
- Witnesses should be offered copies of their statements for future reference.



- **Record the facts**

- Document the accident scene before any changes are made
 - Take photographs
 - Draw sketches
 - Record measurements
- Where possible, record:
 - Pre-accident conditions
 - Accident Sequence
 - Post-accident conditions
- List all equipment and substances used
- Gather supporting documents such as procedures notes, training records, equipment maintenance records.

- **Determine the Causes**

- Determine the immediate causes the accident
 - Unsafe act e.g. rushing
 - Unsafe conditions e.g. defective equipment
 - Both an unsafe act and an unsafe condition
- Identify the underlying cause's e.g. conflicting priorities and no maintenance.

- **Identify preventative measures**

- Identify preventative measures and ensure that they address the immediate and underlying causes
- Ensure that preventative measures comply with legal requirements and appropriate standards
- Consider a time table for the implementation of the preventative measures
- Identify who has responsibility for the preventative measures, including any additional training requirements to fulfil the roles

- **Prepare and Submit Reports**

- Prepare a Company accident report form/manager's investigation form
- Prepare formal accident report following the format provided in the guidance, if necessary
- Consult the relevant safety representative on the investigation report



- Consider submitting a summary of the report (removing any confidential information) to the Departmental Safety Committee and Joint Health and Safety Committee if lessons learned could be shared with other teams, sections or departments.



APPENDIX A

To comply with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, the Company will notify the Health and Safety Executive of certain types of accidents within the prescribed time limits. To help to achieve this, and to obtain guidance on the type of investigation required, all managers must notify the company immediately by telephone if the following types of accidents (including accidents arising from violence) occur:

- Any person dies as a result of the Company's undertaking
- An employee suffers a major injury(*)
- A dangerous occurrence has occurred (**)
- A non employee is taken directly from the scene of the accident to hospital and the accident is as a result of:
 - Defect(s) with the premises; or
 - Defect(s) with equipment; or
 - Faults with the way the service was organised or supervised

If an employee is diagnosed and certificated by his/her doctor as possibly suffering from an occupational disease which is linked to a specific work activity, the manager must contact the Company Directors for advice. A brief list of diseases and work activities follows (***) .

*** Major injuries are:**

- Any fracture, other than to fingers, thumbs or toes
- Any amputation
- Dislocation of shoulder, hip, knee or spine
- Loss of sight (whether temporary or permanent)
- A chemical or hot metal burn to the eye or any penetrating injury to the eye
- Any injury resulting from an electric shock or electrical burn leading to unconsciousness or requiring resuscitation or admittance to hospital for more than 24hrs
- Any other injury
 - Leading to hypothermia, heat-induced illness or to unconsciousness
 - Requiring resuscitation
 - Requiring admittance to hospital for more than 24 hours.



- Loss of consciousness caused by asphyxia or by exposure to a harmful substance or biological agent
- Either of the following conditions which result from the absorption of any substance by inhalation, ingestion or through the skin
 - Acute illness requiring medical treatment; or
 - Loss of consciousness

**** Dangerous Occurrences**

- Collapse or failure of lifting machinery
- Failure of
 - Pressure systems
 - Freight containers
- Contact with overhead electrical lines
- Electrical short circuits attended by fire or explosion
- Certain unintentional explosions or ignitions
- Accident/incidents in which biological agents have been or could have been released
- Malfunction of radiation generators
- Any incident in which breathing apparatus malfunctions
- Collapse of scaffolding
- Certain accidents/incidents involving wells
- Certain incidents involving pipelines
- Failure of fairground equipment
- Certain accidents/incident involving road tankers carrying dangerous substances
- Collapse of building or structures
- Explosions or fires
- Escape of flammable substances
- Escape of any substance likely to cause death or injury

FAILURE TO COMPLY MAY LEAD TO PROSECUTION!!!!!!





*****Dangerous Diseases** include:

Occupational Disease	Work Activity
Cramp of the hand or forearm due to repetitive movements (Repetitive Strain Injury – RSI)	Work involving prolonged periods of handwriting, typing or other repetitive movements of the fingers, hand or forearm
Carpal tunnel syndrome	Work involving the use of hand-held vibrating tools
Hand-arm vibration syndrome	Work involving chain saws, brush cutter, etc.
Hepatitis	Work involving contact with human blood or any source of viral hepatitis
Legionellosis	Work on or near cooling systems or hot water services
Leptospirosis	Work in places infested by rats, field mice, voles. Work at dog's kennels or involving handling of dogs. Work involving contact with bovine animals or their meat products
Lyme Disease	Work involving exposure to ticks e.g. forestry workers
Tetanus	Work involving contact with soil likely to be contaminated by animals
Tuberculosis	Work with persons, animals, human/animal remains which might be a source of infection
Any infection reliably attributable to the work activity opposite e.g. Methicillin Resistant Staphylococcus Aureus (M.R.S.A.)	Work with micro-organisms or with live/dead human beings in the course of providing any treatment or service or in conducting any investigation involving exposure to blood or body fluids.
Mesothelioma, lung cancer, asbestosis	Work with asbestos
Occupational Dermatitis	Work with cement, plaster, concrete, soaps, detergents, etc.
Occupational Asthma	Work with wood dusts, isocyanate, fumes from the use of rosin as a soldering flux, or any sensitising agent.

NOTE: This list of Occupational Diseases is NOT exhaustive. If in doubt about an employee's occupationally related ill health, please contact the Occupational Health Section.

