

HEALTH & SAFETY DOCUMENT:	CODE of PRACTICE
DOCUMENT TITLE:	ACCIDENT/INCIDENT INVESTIGATIONS
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Please Note – the guidance provided in this Code of Practice pertains only to Estates Operations. For other Imperial College’s Health & Safety policies and Codes of Practice go to: <http://www.imperial.ac.uk/safety/>.

1. POLICY

The College has a duty to investigate the immediate and underlying causes of accidents, incidents and near misses and provision is made through the College’s accident reporting system to enable this duty to be met. Estates Operations has a responsibility to its staff, students and visitors and therefore must have arrangements in place for the reporting and investigation of accidents and incidents that occur in areas of the College which are under its control. The aim of carrying out an investigation will be to:

- Establish the cause(s), including underlying causes;
- Prevent a re-occurrence, and
- Provide the College with an account of the incident which may assist it to reach a decision regarding a subsequent claim for compensation.

NB: It is critically important that **all** accidents and incidents are investigated, however it is also important that extensive resources are not employed conducting investigations into ‘minor’ events.

2. BACKGROUND

Estates Operations rightly considers it a necessity to investigate accidents and incidents in the areas under its direct control in order to proactively reduce the frequency and severity of such events and provide a safe environment for staff, students and contractors. This commitment satisfies our duty of care under the Health and Safety at Work (Etc.) Act 1974, and the Management of Health and Safety at Work Regulations 1999.

We acknowledge that unless the causes of workplace accidents and incidents are properly understood, lessons will not be learned, and suitable improvements will not be made to secure the future health and safety of those who may be affected by the College’s activities.

If lessons are to be learned from accidents and incidents, the underlying causes must be understood and communicated to those who have a duty of care to persons having business at the College. Estates will act as appropriate to prevent a recurrence.

This Code of Practice is supplementary to the reporting requirements stipulated within <https://www.imperial.ac.uk/safety/safety-by-topic/accidents--incidents/>.

3. DEFINITION OF AN ACCIDENT AND INCIDENT

Accidents and Incidents are defined as unplanned or uncontrolled events that result in physical harm, damage or loss to people, equipment, buildings, materials or the environment. Note: *For the purpose of this Code of Practice, accidents and incidents do not include theft.*

4. WHAT IS A NEAR MISS?

Any undesired event or condition where no injury, ill health, or damage occurs, but potentially could have. For example:

- Any non-compliance with regulations that could have led to an accident.
- Unsafe conditions such as fire risks or faulty equipment, including failure of a control measure.
- Failure to adhere to any standard operating procedures or risk assessments.
- Observation of unsafe acts such as non-authorised personnel entering restricted areas.
- Falling or flying objects that do not make contact with individuals or cause any significant property damage.
- Waste disposed of incorrectly e.g. laboratory waste going into the wrong waste stream.
- Failure of any equipment or associated systems that are in place to protect health and safety.
- Failure identified by statutory testing e.g. fume cupboard tests, testing equipment under a Written Scheme of Examination
- Failure of building facilities which cause a potential risk to building occupants, e.g. lift entrapments, lack of water supply, room temperature problems etc.

It is just as important to investigate and report on near misses as it is accidents and incidents; the majority of our investigations are near misses.

5. PURPOSE

As stated in the policy the main aim of an accident and incident investigation is to establish what went wrong (the cause or causes) and establish how a recurrence could be prevented or its effects lessened. It is also essential to acquire information and evidence which the College may rely upon in the event of a subsequent compensation claim.

6. RESPONSIBILITY

Heads of Department are responsible for ensuring that a *proportionate* investigation of all accidents and incidents, occurring within their area of responsibility, is carried out. See 7.1 below.

Accidents and Incidents which occur on those parts of the College estate not allocated to or under the control of Estates shall be investigated by the Faculty/Department responsible for that area or in certain circumstances by the Safety Department.

The Safety Department shall investigate accidents where it is unclear as to where the responsibility lies or, due to the seriousness of an incident; a more detailed investigation is required. This is appropriate for all accidents that are reported to the Health and Safety Executive under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

7.0 GUIDANCE

7.1 When to Investigate

Fundamentally, any accident or incident which results in an injury, damage to property or assets, causes a significant disruption to business continuity or potentially damages the College reputation should be investigated

It is essential that all instances as above are investigated but it is equally important that extensive human resources are not employed on conducting investigations into minor events.

7.2 Who should undertake the investigation?

The decision as to who will investigate will depend upon who is injured and where. If a member of Estates staff is injured or involved in the incident the immediate line manager shall determine by whom and how the investigation will be conducted.

The Manager or Supervisor under normal circumstances is the person with sufficient knowledge of the injured person or area, the job being undertaken, the history of the activity or area and of the safe working procedures in place.

Building Managers or Assistant Building Managers will normally conduct investigations in areas for which they have responsibility. Where the accident or incident occurs in a Facilities Management controlled area but involves a student, contractor, visitor or member of Faculty/Departmental staff, the manager having responsibility for the accident/incident location will determine who conducts the investigation and how.

In the event of a fire the College's Fire Safety team will conduct the investigation and report on the findings.

Other persons may also be involved in the accident/incident investigation. Such people may include:

- Staff representatives (Trades Union or Non-Trades Union),
- Student representatives,
- Managers or Head of Department,
- Divisional Safety Officers,

- The Safety Department or Occupational Health.

The numbers of people involved in the investigation should be kept to a minimum, and ideally only involve those with sufficient knowledge of the processes or procedures and those with sufficient health and safety training or management responsibility.

Staff representatives must be given an opportunity to be part of *all* accident investigations. Staff representatives may also conduct their own separate investigation if they so wish and present a report to the College or appropriate Department.

7.2.1 Serious Incidents or Injuries

In all circumstances where the College is required to report accidents and incidents to statutory authorities e.g., the HSE, a member of the Safety Department shall lead the accident/incident investigation and where appropriate complete the F2508.

7.3 The Investigation Process

All accidents and incidents should, in normal circumstances be investigated as soon as possible after the occurrence, as this is the period when witnesses will have a clear memory of the accident/incident and when the environmental conditions will have changed least. Where it is not possible to investigate immediately following an incident the investigation should commence as soon as practicable thereafter.

The Manager responsible (see note 7.2 above), following receipt of a report, should instigate an investigation.

The investigation process should establish the principles of:

- **Who?** - was involved or injured (if anyone)?
- **When?** - did the accident or incident occur?
- **What?** - were the environmental conditions e.g., weather, light etc.?
- **Where?** - did the accident or incident occur?
- **How?** - did the accident or incident occur and what happened?
- **Why?** - did the accident or incident occur?
- **Conclusion** - how can it be prevented in future?

7.3.1 Planning

Accident/incident investigations must be in sufficient detail to: -

- establish the facts;
- use the facts established to try and determine the causes;
- make recommendations to prevent or minimise the effects of a re-occurrence.

7.3.2 Process

Accident/incident investigations must be approached with an OPEN MIND and without prejudice or pre-conceived theories. Accident investigations must be methodical and organised and must **not** apportion blame to individuals. The objective is to learn and take appropriate action.

*Throughout the process it is important to write everything down and **not** depend on memory.*

7.3.3 The Scene

The scene of the accident or incident should be inspected as soon as possible after the occurrence. Where appropriate the area should be cordoned off to prevent disturbance and further accidents until the inspection is completed and thereafter remedial action may be taken.

When assessing the area all appropriate environmental conditions, equipment and fittings must be examined. If equipment or fittings are involved these should be isolated until safety can be assured.

Photographs or sketches should be taken where appropriate.

All items, tools, chemicals or objects associated with the accident or incident should be labeled and their position noted in their relation to the accident scene.

All relevant documentation pertaining to the area or activity to be gathered including, where appropriate, Risk Assessments, Safe Systems of Work, Permit(s) to Work, previous inspection reports, Policies and Job Descriptions.

7.3.4 Witnesses

Where witnesses are available to the accident or incident their views and observations should be sought. If the accident or incident involved, or could have resulted in a serious injury, witness **statements** should be obtained.

Witnesses should always be put at ease and reminded that the purpose of the investigation is not to apportion blame. Their observations should be obtained without any prompting or suggestions from the interviewer. Witnesses should not confer with others before giving their statements.

7.3.5 Witnesses Statements

When the accident or incident necessitates the taking of witness statements it is important that the following criterion is followed:

Note: if the injured person is seriously injured and the incident is actively being investigated by the Health and Safety Executive (HSE), Local Authority or Police the injured person must not be interviewed until they have recovered sufficiently, and the interview does not conflict with the wishes of the Enforcing Authority. In these circumstances the Safety Department will lead the investigation process.

- Interviews should be undertaken at the scene of the accident/incident or in informal surroundings and in a non-threatening manner.
- The witness should be advised that they may be accompanied by a friend or staff representative if they wish.
- The witness should be put at ease, informed of the purpose of the investigation and that it is not the role of the investigators to apportion blame to any individual.
- The witness should be encouraged to speak freely, and to not withhold anything that could materially affect the outcome of the investigation.
- The witness should not be led or directed, and notes should be continuously taken.
- Only interview one person at a time.

At the end of the interview the witness should read what he/she said and if they agree, they should be requested to sign to this effect. The witness can refuse to sign if he/she prefers.

8. PRODUCING THE REPORT

Having conducted the investigation and interview(s) the investigator should consider all the evidence in a logical way in order to determine the most probable cause.

8.1 SALUS

The College's reporting system is called [SALUS](#), College staff should follow the link. A College log-in is required. Once on the Home page, see the Help and User Guide's section 'Reporting an Incident'. An incident should be recorded as soon as possible after it happens; you can subsequently return to the incident report using the SALUS reference number automatically generated, to add investigation information. NB: You should also report 'Near Misses' using this system.

What to record:

- Name and contact details
- Incident type from the drop-down list provided
- Names of those involved.
- Faculty/Department/Section from the drop-down lists provided
- Date/time of the incident
- A description of the incident
- Cause(s) of the incident. Remember that the real cause is **NOT** always the most obvious.
- Location of the incident

The incident investigator should retain any documents, witness statements or evidence gathered during the investigation as this may be relied upon by the College insurer or internal Health & Safety Committees.

9. IMPLEMENT FINDINGS

Where the findings recommend a change to safety policy, safety organisation or practice, these should be referred to the Estates Operations Safety Committee for consideration.

Where the findings have implications for safety management or practice in the Faculties/Departments these should be reported to an appropriate Faculty/Departmental Safety Manager and copied to the College's Safety Director.