

# Health, safety and environmental event investigation policy (personal injuries, near misses and traffic collisions)

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# 1 Introduction

- 1.1 This policy provides details on how to report and record safety events, including injuries, environmental events, near misses and road traffic collisions.
- 1.2 All safety events shall be reported and investigated in accordance with this policy.
- 1.3 The aim of all safety and environmental event investigations is to establish the facts and to identify immediate and underlying causes in order to prevent and/or reduce employee injuries, damage to appliances and equipment, damage to the environment and the impact on organisational effectiveness.
- 1.4 Reporting and investigating safety events in accordance with this policy makes a positive contribution to improving the health, safety and environment of all employees and others coming into contact with them at work (members of the public, other emergency services). The lessons learned from safety investigations also contribute to operational improvement through amendments to operational policy and training.

# 2 Terms

- 2.1 This section defines terms that are used through this policy to ensure that responsibilities can be properly identified.
  - (a) **Accident Report Book (BI 510)**. The requirement to record safety events in the Accident Book (BI 510) is governed by social security legislation, not health and safety and environmental legislation. This is defined by Policy number 463 – Accident books.
  - (b) **Dangerous occurrence**. The HSE have a list of specific events, which must be reported to them as a 'dangerous occurrence'. For further information on dangerous occurrences see Policy number 369 - Reporting of injuries diseases and dangerous occurrences regs 2013.
  - (c) **Distress to wearer**. A 'distress to wearer' (DTW) is a specific type of dangerous occurrence and is defined by Policy number 466 – 'respiratory protective equipment - breathing apparatus – operational procedures. A DTW is a special type of near miss and is reportable to the HSE.
  - (d) **EA**. The Environment Agency.
  - (e) **Hazardous waste**. Hazardous waste is any type of waste, as defined by the Environment Agency (EA), that is potentially harmful to human health or the environment.
  - (f) **HSE**. The Health and Safety Executive.
  - (g) **Injured person**. An injured person is any person, employee, contractor, or visitor (authorised or otherwise), who is injured on premises controlled by London Fire Brigade (LFB), or any person who is injured as a result of the work being done by an LFB employee. The term also includes Brigade employees who are injured on other premises where they are authorised to work but which are not under the control of LFB, e.g. firefighters on 7(2)(d) inspections, fire safety (regulatory) inspecting officers, FRS staff on school visits, etc, in accordance with Policy number 506 - Visiting non LFB premises procedure. Any injury, physical and verbal abuse to LFB employees are also classified as an injury.
  - (h) **Line manager**. A term used to signify an employee's immediate supervising officer/manager.
  - (i) **Local accident investigator (LAI)**. A member of staff, who has been specifically allocated by an SAI to conduct a safety event investigation.

- (j) **Manager.** An employee of any grade appointed to manage employees.
- (k) **Managed local accident investigation.** A managed local accident investigation may be implemented for safety events where injuries or consequences of the event have been serious. The SAI will offer support and guidance on the expected investigation to the LAI.
- (l) **Near miss.** A near miss is a work-related unplanned or uncontrolled event that has the potential to result in injury to individual(s), damage to property, equipment or a loss, or damage to the environment. For example;
- an uncontrolled situation involving use of electricity which, but for fortunate circumstances, could have resulted in electric shock;
  - a vehicle out of control due to brake failure which was finally controlled without causing injury or damage;
  - the fall of equipment which narrowly missed someone;
  - the spillage of a polluting substance which was appropriately cleaned up before contamination of any water or porous ground as defined by Policy number 747 – Polluting material storage and spillage procedure. Health and Safety reviews the near miss event and assess if an investigation is required.
- (m) **Notifiable injury.** Although all injuries within the Brigade are reportable to managers and should be recorded there are certain specified injuries which are required to be reported to the HSE in accordance with RIDDOR. These are called 'notifiable injuries'.
- (n) **Occupational disease.** An occupational disease is any disease which arises out of or in connection with work as defined by RIDDOR. Further information can be found in Policy number 369 - Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013.
- (o) **Person in control** The person who has overall responsibility for the activities of personnel on each site as defined in Policy number 490 - Person in control of LFB premises.
- (p) **PPE** Personal protective equipment, as defined by Policy number 617 – personal protective equipment at work procedure.
- (q) **Principal officer.** A senior manager, generally a uniformed officer in the role of deputy assistant commissioner or above, and FRS member of staff at FRS G (or equivalent) or above.
- (r) **Property.** Any building, vehicle, boat, plant, machinery or item of equipment or resource provided by LFB for use by its employees or contractors.
- (s) **RIDDOR.** The Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013, as amended.
- (t) **Safety or environmental event.** Referred to as 'safety event', 'environmental event' or 'event' throughout this policy. (See Appendix for guidance on safety event reporting).
- (u) **SERD.** The safety event reporting database. This is the electronic solution used to report and record safety events, currently provided by Sphera.
- (v) **Sphera.** Sphera is the trade name of the supplier of the safety event reporting database (SERD) and is often used to refer to the SERD system. All relevant safety events, from the most trivial to the most serious, will be recorded on the SERD system (provided by Sphera) and investigated. Access can be achieved through SPHERA Cloud on the desktop screen

or through the **portal** by using START menu > All Programs > Business Aps > SERD>SPHERA Cloud.

- (w) **Senior accident investigation.** A senior accident investigation may be instigated for events with serious injuries or consequences. Such investigations will be managed by a by a qualified senior accident investigator.
- (x) **Senior accident investigator (SAI).** An operational officer who has received specialist training in accident investigation, appointed by the assistant director health and safety. This group of staff will investigate events of a more serious nature as well as provide advice and direction to local accident investigators (LAI).
- (y) **Senior accident investigation lead (SAI lead).** The SAI lead is a group commander within the Health and Safety Team who has been appointed by the assistant director health and safety to lead on the facilitation and coordination of the SAI group (SAI attribute) and the management of senior accident investigations.
- (z) **SERD** relates to the safety event recording database, provided by the supplier Sphera, where all safety events are recorded. A SERD form is the recording form used for capturing data in the SERD system.
- (aa) **Spill kit** A kit comprising of a variety of products such as, but not exclusive to, absorbent materials, PPE, drain covers and booms. To be used on products being stored and identified through pre-planning and risk assessment by the person in control, as detailed in Policy number 747 – polluting material storage and spillage procedure.

### 3 Safety event investigation – staff responsibilities

- 3.1 The responsibility for reducing injuries, road traffic collisions and environmental damage rests with everyone employed by the Brigade. Details of those staff with specific responsibilities for safety event investigation are listed below.

#### Principal officers

- 3.2 Principal officers must ensure that;
- sufficient staff are selected and trained as LAIs;
  - investigators receive suitable and sufficient time, facilities and support to enable them to complete investigations correctly and in a timely manner.
- 3.3 They must establish and maintain a monitoring process to ensure the progress and completion of any remedial actions, which arise as a result of a safety and environmental event investigation conclusion(s) and lie within their area of control.
- 3.4 Should the nearest or home station/location LAI be unavailable, principal officers shall authorise an LAI to be released from elsewhere within their area of responsibility (Borough/Area/ Department) to conduct the investigation and offer all assistance and co-operation under these circumstances.

#### Assistant director health and safety

- 3.5 The assistant director health and safety is responsible for establishing and maintaining:
- (a) A team of SAIs made up of operational officers, with sufficient resources and facilities to investigate a major safety or environmental event.

- (b) A rota of operational officers, to ensure at least two SAIs are available for each 24 hour duty period.
- (c) Appropriate training, development, supervision and quality assurance for employees required to undertake SAI and LAI safety and environmental event investigations.
- (d) Policies and procedures for direction, information and guidance of any employee authorised to conduct an accident investigation or those required to supply information, documentation or resources in support of an investigation.
- (e) A suitable electronic system is provided for the purposes of reporting and recording safety events and safety event investigations.
- (f) Administrative support for the following:
  - Notifying the HSE of reportable injuries, dangerous occurrences and cases of reportable industrial disease, on the appropriate forms and within the statutory time limits, as detailed in Policy number 369 - Reporting of Injuries Diseases and Dangerous Occurrences Regs 2013.
  - Notifying the Brigade's Sustainable Development Team and where necessary the Environment Agency, or other appropriate regulatory authority, of any major environmental event.
  - An up to date register of safety and environmental event investigations and their progress for safety events throughout the Brigade.
  - The provision of any additional advice, support and guidance to investigators at local level.
  - A system for reviewing and amending this policy and related documentation to incorporate current best practice as and when required but not less than every three years from the date of implementation or previous review date.
  - A system for communicating a list of 'RIDDOR' events to staff side representatives as and when appropriate.

### **Senior accident investigator (SAI)**

3.6 An SAI will be informed of all safety and environmental events that occur and shall, in strict accordance with this policy and the [SAI Manual](#):

- assess the level of safety event investigation required
- nominate and mobilise (through the Resource Management Centre) officers to undertake investigation where this is required
- nominate an appropriate manager to act as local accident investigator (LAI), depending on the nature of the safety event and the severity of injuries
- provide ongoing support to the nominated LAI with regard to the completion of the investigation
- inform others (specifically Resource Management Centre or Brigade Control) of these decisions
- ensure relevant staff, including the SAI lead and/or assistant director of health and safety are provided with timely updates following serious injuries to staff or the public

- attend safety events when appropriate and offer support and advice to officers conducting investigations into safety or environmental events.
- 3.7 If an SAI considers that an event warrants a full senior accident investigation, they must ensure that the assistant director of health and safety and the SAI lead are informed at the earliest opportunity. The assistant director health and safety is responsible for declaring an investigation as an SAI investigation.
- 3.8 SAIs shall attend routine meetings to discuss safety events and undertake actions as detailed at these meetings or as detailed by the assistant director of health and safety or the SAI lead.
- 3.9 If the incident has been the subject of a senior accident investigation (SAI), the nominated senior accident investigator (SAI) will be required to liaise with the PRC chair prior to the PRC in order to ensure that the chair is fully aware of the circumstances, as known at the time, leading to initiation of SAI. Policy number 985 - Operational safety management - knowledge skills and competence – NOG.
- 3.10 The nominated SAI will attend and fully participate in the PRC in order to ensure that all aspects of the investigation relating to incident command are raised and discussed but they will have no role in the awarding of points.

### **Local accident investigator (LAI)**

- 3.11 Local accident investigator (LAI) will be a minimum rank of sub officer or FRS C grade or equivalent.
- 3.12 Once nominated by the SAI to investigate an event, the LAI must do so without delay and in strict accordance with this policy and the [LAI Manual](#). The LAI will remain responsible for the completion of this investigation and the identification of any remedial actions arising from it.
- 3.13 The LAI should complete the initial entry on SPHERA.
- 3.14 The LAI is responsible for interviewing and/or the collation of statements by all witnesses, annotated with the SPHERA number, and attached to the SERD record.
- 3.15 The sequence of events, collection and analysis of evidence, conclusions on immediate and underlying causes and actions taken to prevent a recurrence are the responsibility of the nominated LAI. **These may not be delegated.**
- 3.16 The LAI is responsible for completing the investigation part of SPHERA and then submitting the SERD (SPHERA) record for 'quality check' by another manager, usually the LAI's line manager. The investigation (including quality check and final review) and immediate actions taken to prevent a recurrence must be completed within the Brigade standard of 28 days. It is not expected that all remedial actions will be able to be completed within the 28 days period, but they should have been identified and recorded.
- 3.17 Where the Brigade standard of 28 days cannot be achieved the LAI must inform the SERD Team via the SERD Team mailbox: [SerdTeam@london-fire.gov.uk](mailto:SerdTeam@london-fire.gov.uk) and provide reasons for why this is the case.
- 3.18 Where the initial nominated LAI is investigating a safety or environmental event away from their normal place of work, they may transfer responsibility for the investigation to the person in control of the premises (or a more local LAI) on their return, with their express consent. The LAI with the initial responsibility for the investigation of a particular safety event is required to notify the SERD Team at HSS, Brigade HQ, Union Street of any change of LAI via [SerdTeam@london-fire.gov.uk](mailto:SerdTeam@london-fire.gov.uk).

## **Managers – all investigations (leading firefighter or FRS B and above)**

- 3.19 When a safety event occurs the local manager (or incident commander at operational incidents) is responsible taking immediate action to:
- stabilise the scene;
  - make the scene safe, taking immediate actions to prevent a recurrence of the safety event or further injury;
  - initiate first aid (where necessary), and arranging for staff welfare if required;
  - requesting an SAI via control (if on the way or at an incident) or RMC (for all other incidents);
  - request additional resources where required;
  - secures evidence, cordon off the scene, impound equipment and take photographs as necessary;
  - for opening and beginning to complete an entry in SERD (SPHERA) (through the main system for licensed SPHERA users (i.e. staff at sub officer or above) or through the SPHERA Portal for staff without a license (i.e. staff below the rank of sub officer). FRS staff should contact the SERD administration team for access to the SPHERA system.
- 3.20 Additionally, all line managers must immediately report injury, disease and dangerous occurrences that are defined as notifiable to the Health and Safety Department by contacting the SERD Team at HSS, Brigade HQ, Union Street (email: [SerdTeam@london-fire.gov.uk](mailto:SerdTeam@london-fire.gov.uk)) or by phone. The Health and Safety Department will then inform HSE (Policy number 369 - Reporting of Injuries Diseases and Dangerous Occurrences Regs 2013) .

## **Employees**

- 3.21 All employees are required to report any safety, near miss or environmental event to their line manager or RMC immediately it comes to their attention, by the quickest possible means.
- 3.22 All employees can add a safety event on the SERD (SPHERA) system through by either logging into the system or through the portal system for staff without a license (i.e. staff below the rank of sub officer).
- 3.23 Employees have a legal responsibility to co-operate with their employer (under Section 7 of the Health and Safety at Work etc. Act 1974) and offer all relevant information known to them concerning an event. It is their legal duty to give every assistance to investigating officer(s) during a safety event investigation. Brigade employees, or agents of the Brigade, involved in the investigation of a safety or environment event may be required to provide a signed written statement, as part of the investigation process.
- 3.24 Brigade employees involved in or witness to a safety event need to be aware that any statement they make, whether signed or not, will be for the purposes of preventing the recurrence of injury and for the continuous improvement of health and safety or environmental management and any such statement will not be used for disciplinary purposes.
- 3.25 To investigate an alleged offence against discipline, an independent investigation will be conducted in accordance with Policy number 392a – Disciplinary procedure uniformed staff fire and rescue staff and control staff and Policy number 392 – Discipline (conduct) procedure.

## **4 Safety and environment event reporting process (see Appendix 1 and 2 for flow diagrams showing the reporting process)**

### **Duty to report events**

- 4.1 Every employee is required to report any safety, near miss or environmental event immediately to their line manager (or incident commander at operational incidents) to facilitate prompt action so as to prevent a recurrence of the injury and/or to minimise loss.
- 4.2 Events which require reporting include:
- Any safety, near miss or environmental event involving LFB employees whilst on duty whether injury is sustained or not.
  - Any safety, near miss or environmental event involving LFB employees whilst training, whether injury is sustained or not.
  - Any safety, near miss or environmental event involving persons on LFB premises; including visitors, contractors and members of the public, whether authorised or not to be on LFB premises, or any person who is injured as a result of LFB activities on any premises not owned or controlled by LFB staff or their agents.
  - Any safety, near miss or environmental event where the action or inaction of an LFB employee, or their agent, in the course of their employment is likely to cause environmental damage.
  - All safety, near miss or environmental events must be reported to the line manager as soon as possible. Safety events and near miss events may also be reported by any staff member by using the SPHERA Portal reporting system. Safety events (injuries, RTCs and environmental events) should only be reported via the SPHERA portal on the specific request of the LAI. Near misses may be reported anonymously by any member of staff if they choose to do so.
  - Any statement made, for the purposes of a safety, near miss or environmental event investigation, whether signed or not, will be for the purposes of the investigation, or any personal injury claim made in connection with the event, and may not be used for disciplinary purposes.
  - Any alleged vehicle event where a third party reports an alleged event involving a Brigade vehicle. A flow diagram for the actions to be taken is included in Appendix 4. Further details are contained in Policy number 409 - Legal and insurance aspects of vehicle accidents.

### **Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 13)**

- 4.3 It is a statutory requirement that certain categories of injury, disease and dangerous occurrences are notifiable to the HSE. The detailed list is available in Policy number 369 - Reporting of Injuries Diseases and Dangerous Occurrences Regs 2013. The Health and Safety Department will notify the HSE when these categories arise.

### **Completion of the accident report book**

- 4.4 An event investigation will take place immediately, even if the injured person has not made an entry into the accident book. Managers must be aware that the unwillingness of an injured person to make an entry in an accident book is not a justifiable reason for not conducting an investigation.
- 4.5 Conversely managers cannot prevent any person making an entry in an accident book.



- 4.6 The stub of the accident book entry must be annotated by the LAI or line manager with the SERD (SPHERA) number for the safety event.
- 4.7 Redacted accident book forms are provided to staff side safety representatives in line with appropriate legislation. Employees are to be made aware that there is a tick box option within the accident book. If the employee chooses to tick this box it will give consent for certain personal information to be passed to staff side safety representatives as part of this form. For further information please contact the Health and Safety Team.
- 4.8 The accident book sheet is removed, once completed and forwarded to the SERD Team, HSS, Brigade HQ, by the LAI.

### **Immediate action by the manager at the scene of the event when informed a safety event has occurred**

- 4.9 When informed of the event, the manager at the scene of the event must:
- Take action to prevent an immediate recurrence of the safety event.
  - Ensure first aid is rendered as necessary.
  - Assist in the welfare of arranging removal to hospital and arranging for a welfare officer if required.
  - Isolate the location and any equipment involved in the event until the arrival of an investigating officer or told by them it will not be necessary.
  - Contact Control if en route or at an incident or RMC requesting that an SAI contacts the line manager. Once the SAI has contacted the line manager the SAI will decide on level of investigation and advise the line manager.
  - Inform the RMC of the details of the event, including; the name, role or grade and payroll number of the person(s) involved (or their position and reason for presence if not an LFB employee), the location, date and time of the event, the nature of the event and brief description of any injury or environmental loss. Where possible provide a contact telephone number for use by the SAI or LAI.
  - Start the investigation of the safety event as advised by the SAI, impound necessary equipment and arrange for collection and delivery to relevant department.
  - Check that an entry has been made in the accident report book (BI 510).
  - For both uniformed and non-uniformed staff the line manager concerned is to notify their head of section/station officer/FRS equivalent, as soon as possible after being informed of an event.
  - Begin to complete an initial entry in SERD (SPHERA), only when directed to do so by the LAI.
  - Some injuries if not treated promptly after the event can lead to long term health problems. In cases where the line manager thinks it appropriate the injured person should be sent to the Occupational Health Unit (OHU) to ascertain if they have or are likely to have a condition which may deteriorate. In most cases early diagnosis of a potential problem can result in positive action being taken to treat the condition before it becomes more serious.

### **Referring specific injuries to the Occupational Health Unit (OHU)**

- 4.10 In all cases, reports where the following injuries have occurred, must be referred to the OHU:
- Whiplash/jarring of the neck following a road traffic collision or fall.

- Ringing in the ears (Tinnitus) following exposure to loud noise, e.g. a cylinder exploding or an AFA.
  - Inhalation of smoke, even if the injured person has been discharged from hospital with satisfactory level of carbon monoxide in their blood.
  - Any muscular skeletal injury which does not have an identifiable cause or appears too severe for the event. For example, when a person reports a neck strain due to turning to look at a clock or dislocated a knee while walking normally across the drill yard. Both examples indicate an injury normally incompatible with the activity.
  - Any head injuries.
  - Psychological ill effects, as in post-traumatic stress, as detailed in Policy number 690 - Managing stress within the LFB.
- 4.11 Any referral to the OHU must be done through People Services (Wellbeing Team) in accordance with the procedure set out in Policy number 1005 – Supporting health and wellbeing policy or [Section I of the Staff Code](#), and wherever possible within 24 hours of the safety event occurring.

### **Action by the Resource Management Centre (RMC)**

- 4.12 On receipt of information of an event RMC shall:
- Page the SAI and provide details of the event and a contact telephone number.
  - Complete the safety, near miss or environmental event notification and distribute as required.
  - Support the SAI/LAI as required for the immediate response to the event.
  - Page officers and pass contact details as required by the SAI.
  - Mobilise other resources as requested by SAI.
  - Include the safety event SPHERA number in the subsequent daily report.

### **Action by the SAI**

- 4.13 Respond to paging from RMC or Control and obtain details of the event and the contact number.
- 4.14 Using the safety event investigation matrix (Appendix 4) as a guide, determine at what level the investigation will need to take place. Contact RMC to ascertain the most appropriate officer(s), nominate them as local accident investigator and have them paged/informed by RMC. The SAI is to provide a contact phone number to RMC, so the nominated LAI can contact them.
- 4.15 If possible, the SAI is to contact the manager at the scene of the event, establish the details of the event and give guidance as necessary. The SAI will determine if their attendance at the scene is required, if it is, the SAI may also order the LAI or a local station commander (if the LAI is unavailable) to attend the scene to assist in preserving evidence as instructed by the SAI.
- 4.16 If a preliminary investigation by the SAI is necessary the SAI should proceed with the investigation as per the [SAI Manual](#).
- 4.17 If the SAI considers their attendance unnecessary, they will contact the LAI and advise them of their decision not to attend and indicate the required action by the LAI to respond to the event.
- 4.18 Dependant on the SAI's decision, this may or may not require the immediate attendance of the LAI at the scene of the event. The SAI will take the following into account when deciding what attendance is required:
- severity of event

- time critical securing of scene, evidence, equipment and witnesses
  - scope of immediate actions to prevent recurrence
  - risks to the Brigade
- 4.19 The SAI will contact the relevant manager(s) and inform them of the actions being initiated and direct further actions as required.
- 4.20 The SAI will contact RMC again and update them of the appointed LAI and line manager details involved in the event.
- 4.21 The SAI will remain available to support and direct the LAI/line manager, as required.

### **Action by appointed LAI (sub officer/FRS C and above)**

- 4.22 Respond to paging from RMC and contact the SAI, at their earliest opportunity.
- 4.23 Following discussion with SAI, attend the scene of the event and conduct an investigation as directed by the SAI and/or in accordance with the LAI manual. Complete a SPHERA report form.
- 4.24 If attending the scene of an event or hospital inform Brigade Control of change of location and status.
- 4.25 The LAI is responsible for taking action after an event to prevent the recurrence of the event/injury. Action to prevent a recurrence should be recorded in SERD/SPHERA, including referencing material to allow progress to be checked.
- 4.26 The LAI is responsible for uploading all statements, photos and evidence onto the SPHERA form. Photos can also be uploaded to the Brigade Library if there are a number of photo's that relate.
- 4.27 On completion of a SPHERA report, the LAI completes actions to prevent a recurrence box in SERD – immediate actions taken to prevent recurrence and conclusions of the report.

### **Action by team leader/station commander/borough commander/FRS senior manager**

- 4.28 Discuss, direct and guide the LAI on:
- gathering evidence
  - analysis of evidence in the initial stages
  - conclusions on the immediate and underlying causes of the accident
  - identifying appropriate remedial actions.
- 4.29 Ensure LAI investigations are carried out within the Brigade's standard timeframe of 28 days.

### **Action by managers allocated to complete quality check**

- 4.30 Once the investigation part of the SPHERA form is completed by the LAI then this is submitted for quality check. Managers allocated an investigation for quality check must ensure that the check is completed within the overall timeframe (28 days) for completion of the investigation.
- 4.31 The quality check will generally be completed by a rank or grade above that of the LAI. (Refer to Appendix 5 accident investigation matrix).
- 4.32 Part of the quality check will involve checking:
- All sections of the SERD (SPHERA) entry are completed correctly
  - All documents are uploaded and checked (i.e. statements, reports, photos added to SPHERA and/or the image library)

- All remedial actions have been identified, recorded correctly and plans are in place to discharge them (with timescales)
- 4.33 If a manager allocated to complete a quality check is not satisfied with the quality of the investigation they will add comments to the SERD entry and allocate a task to the LAI on the tasks/criteria that are required to be reviewed so that the appropriate changes can be made to complete the investigation.
- 4.34 When the manager allocated to quality check is satisfied, they will submit the form for 'final review' and closure by the Health and Safety Team.

### **Action by the SERD Team, Health and Safety**

- 4.35 When notified of a safety or environment event the SERD Team shall e-mail a standard reminder to the nominated LAI within 14 days informing them of the need to complete the investigation within 28 days.
- 4.36 The LAI is further notified via e-mail when the 28 day deadline is breached.
- 4.37 On completion of a SPHERA report by the LAI, the SERD Team shall e-mail an electronic copy of the report to the appropriate manager for quality assurance.
- 4.38 The SERD Team shall collate all SPHERA reports from the SERD database, which will be reported monthly as part of the 'late to DACS report'
- 4.39 The SERD Team shall collate all actions on a database for monitoring purposes. These will be reported to the appropriate area DAC.

### **Serious accident investigations – conclusions and recommendations**

- 4.40 In the case of serious accident investigations, the senior investigator will present conclusions/recommendations to principal officers for their review and agreement at the Operational Professionalism Board (OPB). Outcomes from SAIs will be included in the Operational Improvement Database and monitored through the Operational Improvement Plan Oversight Panel (OIPOP) and through the Operational Professionalism Board (OPB).

## **5 Immediate action to prevent a recurrence of the safety event**

- 5.1 As soon as practical following a safety or environmental event, immediate action must be taken by the responsible manager to ensure the scene of the event is made safe. This action is to be executed with an awareness that an investigator (LAI or SAI) may require to inspect the scene secured in the condition the event occurred (for example if an aerial appliance fails whilst in use and it poses no ongoing danger to persons, it should be left in its current state and not be made up).
- 5.2 The LAI will advise the local managers of any required immediate actions that are identified as part of an investigation. These are to be recorded in SERD (SPHERA) by the LAI as 'immediate actions to prevent recurrence'.
- 5.3 The LAI may also need to inform the responsible policy department to ensure these improvements are fed back to achieve an overall improvement of the safety management system, in accordance with the HSG 65 model and the Brigade's operational improvement process.

## **6 Investigators' advice to witnesses**

- 6.1 Before commencing an interview or when requiring a statement, an investigator shall advise employees of the Brigade of their responsibility under Section 7 of the Management of Health and Safety at Work etc. Act 1974 (see 3.19).
- 6.2 The investigator will inform employees that they may choose to request the attendance of a trade union safety representative to accompany them when giving a statement or an interview.
- 6.3 In certain cases, an investigator will be working on a collaborative information gathering exercise with staff side health and safety representatives. Employees will be made aware of this information prior to giving a statement or interview.

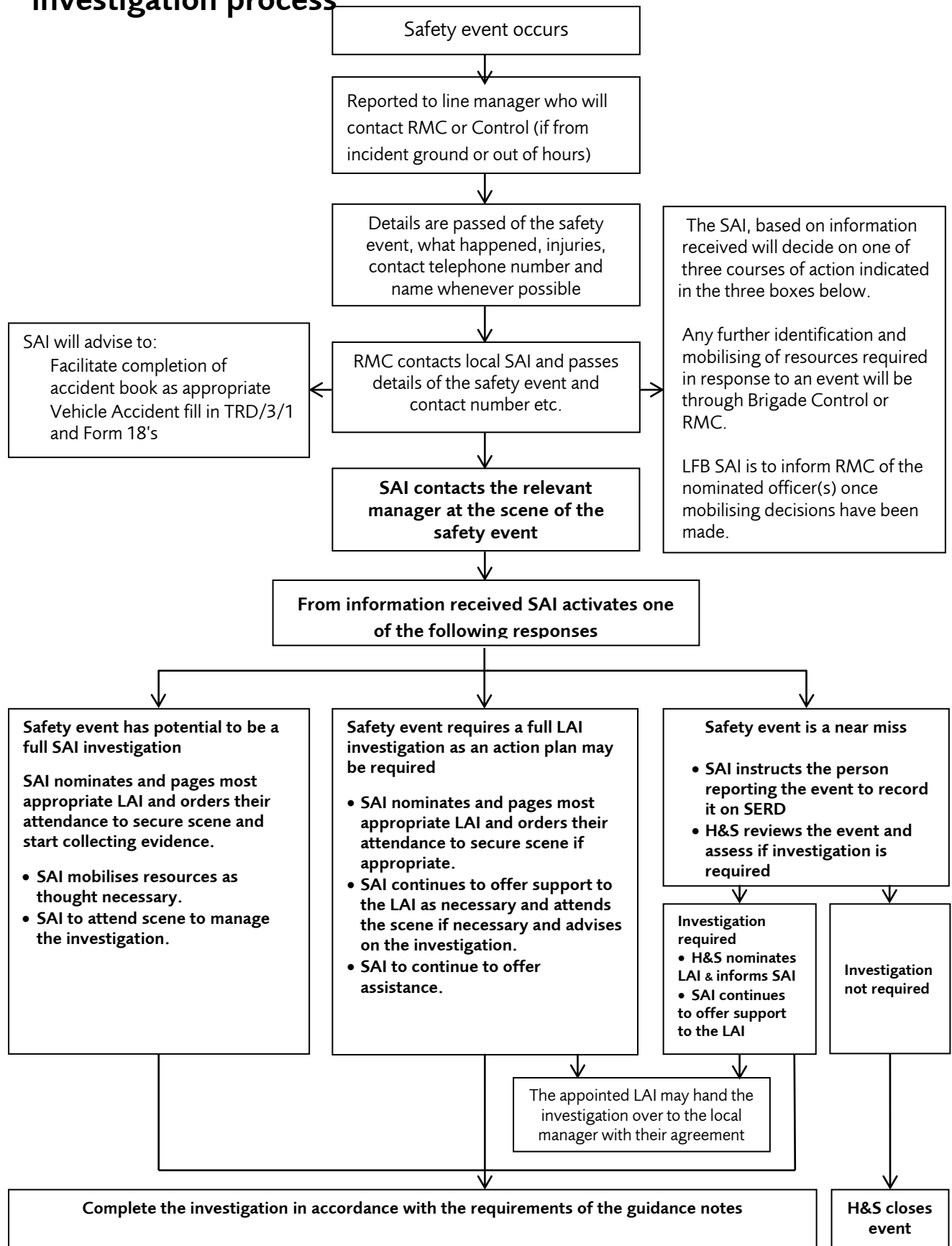
## **7 Joint investigations**

- 7.1 Where there has been a notifiable injury or dangerous occurrence, or an occupational disease has been contracted at work, trade union safety representatives are entitled to complete an investigation of that incident and/or workplace.
- 7.2 In certain circumstances, usually this will be in relation to an SAI where serious injuries have occurred or an event that has serious organisational consequences, it may be appropriate to conduct an investigation jointly between management and safety representatives.
- 7.3 Management or safety representatives may request a joint investigation through the Brigade Joint Committee for Health, Safety and Welfare (BJCHSW). It is the responsibility of the assistant director health and safety to consult with colleagues to determine when Brigade management and safety representatives conduct a joint investigation and when this should be undertaken.
- 7.4 Where a joint investigation takes place safety representatives will be given reasonable facility time in accordance with Policy number 222 – safety representatives and safety committees, to carry out their investigative duties. The relevant trade unions will be responsible for nominating a safety representative to participate in the joint investigation.
- 7.5 In joint investigations all evidence will be shared openly in the investigation team. There is however no obligation to Brigade management or trade unions to produce a joint report or agree conclusions and recommendations.

## **8 Release of information from an investigation**

- 8.1 Information received as part of a safety or environmental event investigation may not be passed at local level directly to any third party without first giving due consideration to the General Data Protection Regulations (GDPR), Policy number 351 – Data protection and privacy policy applies. The term 'third party' includes but is not limited to the injured person, witnesses or solicitors acting for the injured person. Any information requested by solicitors in connection with an investigation may only be released through the Brigade's General Counsel.
- 8.2 An individual may request to see their accident report. If more information is requested this should be addressed to the Brigade's General Counsel within three years of the event occurring, in accordance with Policy number 351 - Data protection and privacy.
- 8.3 Any requests for information from recognised staff side safety representatives for information relating to events notifiable to the HSE must be made in accordance with the procedures in Policy number 222 - Safety representatives and safety committees.
- 8.4 All parties must treat any information provided to them in accordance with Policy number 351 – Data protection and privacy.

# Appendix 1 - Safety, near miss and environmental event investigation process

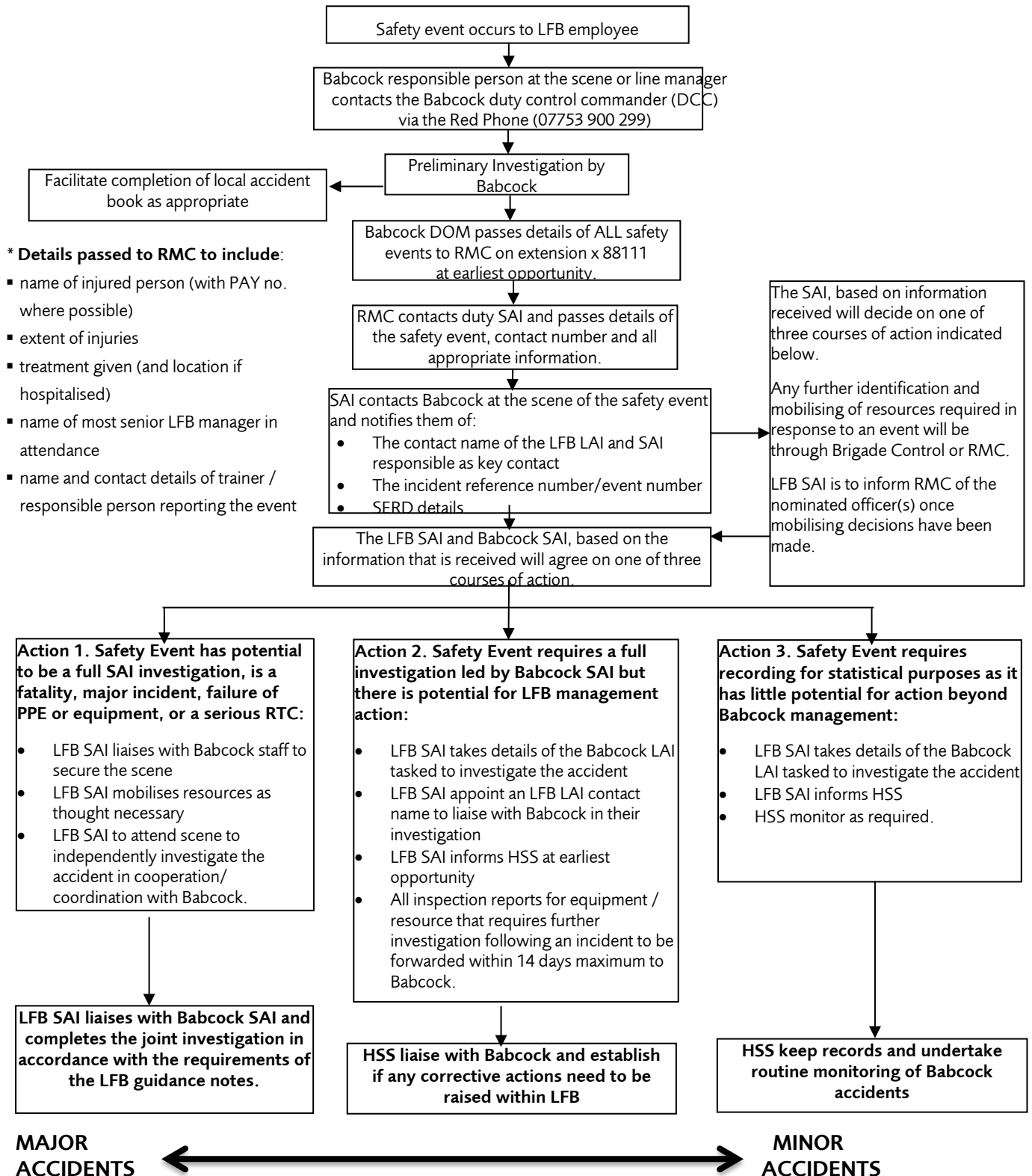


MAJOR ACCIDENTS



NEAR MISSES

## Appendix 2 - Safety, near miss and environmental event investigation process - involving LFB staff during Babcock led training events and/or in Babcock-controlled areas



**LFB LAI (or LFB SAI if Action 1 or if nominated LFB LAI not immediately available for Action 2) – initiates SERD and completes minimum mandatory fields:**

- Date and time of event?
- Main activity?
- Type of event?
- Who reported the event? – **name of LFB employee or Babcock employee**
- To whom was the event reported? – **SAI**
- Date and time of report?
- Line manager informed?
- RMC informed?
- Station commander/section manager PAYE No? – **SAI PAYE No?**
- Nominated Investigating officer – **SAI or LAI PAYE No.**
- SAI informed - **SAI PAYE No.**
- Complete entry

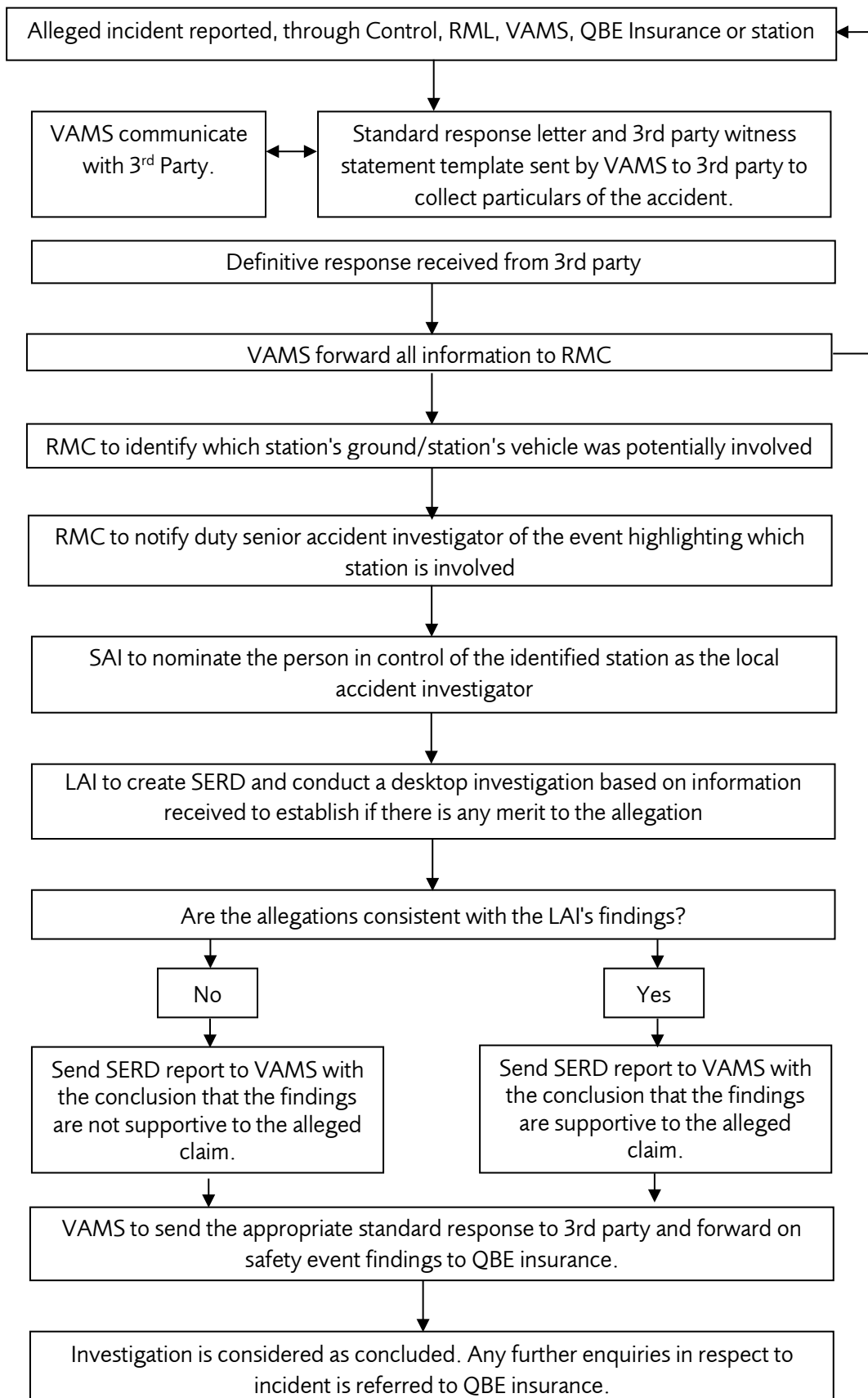
**In ALL courses of action Babcock will follow the steps below –**

Duty control commander nominates either a Babcock local accident investigator (LAI) or Babcock senior accident investigator (SAI) to lead the investigation.

- Responsible person at scene or Babcock accident investigator completes an electronic Education and Training Accident/Incident/Near Miss Form (C218)
- Babcock accident investigator completes Section D of Accident/Incident/Near Miss form including information on lost time and –
  - (a) retains local copy
  - (b) mails a copy of Accident/Incident/Near Miss Form to the LFB contact when known, specific HS adviser for LFB and E&T Health and Safety Function to the Babcock training health & safety advisor: [aidan.codd@babcockinternational.com](mailto:aidan.codd@babcockinternational.com)



## Appendix 3 - Alleged vehicle event process chart



VAMS have first point of contact with the member of public. Minimum information to progress the alleged vehicle collision is:

- Date
- Time
- Incident location, including nearest junction
- Type of Brigade vehicle
- Blue lights and sirens on/off
- What part of the vehicle hit their vehicle and damage caused
- Any witnesses and details

## Appendix 4 - Accident investigation matrix

Nature of event/injury	Level of investigation	Carried out by	Investigation quality check and notifications
<p><b>Trivial</b> Includes:</p> <ul style="list-style-type: none"> <li>Injuries (no lost time)</li> <li>Near misses with trivial potential consequences</li> <li>Road traffic collisions (vehicle events) with no visible or superficial damage</li> </ul>	<p><b>Simple</b> Complete accident injury form and/or vehicle event form and investigation record.</p> <p>Complete near miss form (no further investigation. NB: Near misses are monitored for trends)</p>	<p>Sub officer or station officer as LAI Initial part of form (basic details) may be delegated for leading firefighter or FF to complete through the PORTAL.</p> <p>Investigation part of form must be completed by the appointed LAI.</p> <p>For vehicle events the initial part of the vehicle event form may be completed by the DRIVER.</p>	<p>LAI's line manager to quality check (Review investigation form and sign off)</p>
<p><b>Slight</b> Includes:</p> <ul style="list-style-type: none"> <li>Injuries resulting in first aid treatment, but less than 3 days lost time or accidents causing minor damage to equipment/materials (Not reportable under RIDDOR)</li> <li>Near misses with slight potential consequences</li> <li>Road traffic collisions (vehicle events) with minor damage</li> </ul>	<p><b>Simple</b> Complete accident injury form and/or vehicle event form and investigation record.</p> <p>Complete near miss form (no further investigation. NB: Near misses are monitored for trends)</p>	<p>Sub officer or station officer as LAI Initial part of form (basic details) may be delegated for leading firefighter or FF to complete through the PORTAL.</p> <p>Investigation part of form must be completed by the appointed LAI.</p> <p>For vehicle events the initial part of the vehicle event form may be completed by the DRIVER.</p>	<p>LAI's line manager to quality check (Review investigation form and sign off)</p>
<p><b>Serious</b> A broad category between slight and major Includes:</p> <ul style="list-style-type: none"> <li>Injuries with 3 or more days lost time, requiring medical treatment (which could include hospital admission but only where this is less than 24 hours admission). Requiring a formal report to the HSE under RIDDOR. Failure or corruption of safety measure or procedure i.e. broken or damaged device.</li> </ul>	<p><b>Formal</b> Complete accident injury form and/or vehicle event form and investigation record.</p> <p>Complete near miss form (whether further investigation is required will be determined by the Health and Safety Team who will allocate an LAI if necessary)</p> <p>HSE may also choose to investigate</p>	<p>SAI will consider what LAI is appropriate for the investigation and allocate to station officer or station commander accordingly.</p> <p>Initial part of form (basic details) may be delegated for sub officer or leading firefighter to complete through the PORTAL.</p>	<p>LAI's line manager to complete quality check (Review investigation form and sign off)</p> <p>SAI to consider early notification of local senior management</p> <p>Discuss at local (area) H&amp;S Committee</p>

Nature of event/injury	Level of investigation	Carried out by	Investigation quality check and notifications
<ul style="list-style-type: none"> <li>Near misses with serious potential consequences</li> <li>Road traffic collisions (vehicle events) with significant vehicle damage</li> </ul>		<p>Investigation part of form must be completed by the appointed LAI.</p> <p>H and S team determine who will complete quality check</p>	
<p><b>Major</b> Includes:</p> <ul style="list-style-type: none"> <li>Injured person suffers a 'specified injury' as defined by RIDDOR.</li> <li>Damage to system, facility, failure of safety measure or procedure</li> <li>Near misses with major or critical potential consequences</li> <li>Road traffic collisions (vehicle events) with major vehicle damage or member of the public injured</li> </ul>	<p><b>Formal</b> Complete accident injury form and/or vehicle event form and investigation record.</p> <p>Complete near miss form (The Health and Safety Team will allocate for further investigation and appoint an LAI. NB: Near misses are monitored for trends)</p> <p>HSE may also choose to investigate</p>	<p>Station commander LAI</p> <p>For more serious injuries/events the SAI lead may consider a managed LAI (Local SAI may complete the investigation).</p> <p>Managed LAI's will be supervised by SAI lead in H and S team</p> <p>Under some circumstances this investigation may become a full SAI</p> <p>An SAI or H&amp;S advisor will complete quality check.</p>	<p>Line manager, SAI or health and safety advisor quality check</p> <p>SAI to contact SAI lead in H and S team; SAI lead in H and S team to notify Brigade managers</p> <p>SAI to consider early notification local senior management, area office and duty staff</p> <p>Discuss at local (area) H&amp;S Committee and Senior Management Team meetings.</p> <p>Notify BJCHSW management joint secretary to contact staff side joint secretary.</p>
<p><b>Critical</b> Includes:</p> <ul style="list-style-type: none"> <li>A fatality (to staff or member of public through RTC or other activity), major injuries to more than one person in the same incident, or severe injuries resulting in long term illness or disability.</li> </ul>	<p><b>Full SAI</b> Investigation team appointed by assistant director, health and safety and SAI lead and supervised by assistant director, health and safety</p> <p>Major incident investigation policy may apply.</p> <p>NB: HSE/Police may also choose to investigate</p>	<p>Appointed SAI</p> <p>SAI led, H and S team involved in investigation</p> <p>Supervised by assistant director, health and safety</p>	<p>SAI lead and assistant director, health and safety to sign off investigation</p> <p>Notify health and safety team immediately</p> <p>SAI lead to contact Brigade managers, Assistant director, health and safety and local senior management (area office).</p> <p>Assistant director, health and safety to notify HSE liaison (immediately).</p>

Nature of event/injury	Level of investigation	Carried out by	Investigation quality check and notifications
			Notify BJCHSW management joint secretary to contact staff side joint secretary.

## Appendix 5 - References

1. Policy Number 021 - Procedure for safe reversing and other vehicle manoeuvres.
2. Policy Number 213 - Control of noise at work procedure.
3. Policy Number 222 - Safety representatives and safety committees.
4. Policy Number 369 - Reporting of injuries diseases and dangerous occurrences regs 2013.
5. Policy Number 463 – Accident books.
6. Policy Number 466 – respiratory protective equipment - breathing apparatus – operational procedures.
7. Policy Number 490 - Person in control of LFB premises.
8. Policy Number 505 - Safety of visitors to LFB premises procedure.
9. Policy Number 506 - Visiting non LFB premises procedure.
10. Policy Number 510 – Brigade premises health safety and environment inspections.
11. Policy Number 540 - Manual handling operations procedure.
12. Policy Number 549 - Energy conservation (and sustainability) in LFB premises.
13. Policy Number 601 - Control of exposure to exhaust emissions at work.
14. Policy Number 617 - Personal protective equipment at work procedure.
15. Policy Number 643 - Hazardous waste disposal.
16. Policy Number 671 - Lifting operations and lifting equipment procedure.
17. Policy Number 677 - LFB environment policy.
18. Policy Number 690 - Managing stress within the LFB.
19. Policy Number 747 - Polluting material storage and spillage procedure.
20. Policy number 985 - Operational safety management - knowledge skills and competence – NOG
21. The Environmental Permitting (England and Wales) Regulations 2010 (SI 2010/675) as amended SI 2010/676, SI 2010/2172, SI 2011/2043, SI 2011/2933, SI 2012/630, SI 2013/390, SI 2013/766, SI 2014/255, SI 2014/2852, SI 2015/324, SI 2015/918, SI 2015/1360
22. The Pollution Prevention and Control (Designation of Directives) (England and Wales) Order 2013 (SI 2013/123).
23. Environmental Protection (Duty of Care) Regulations 1991.
24. Environmental Protection Act 1990 (c. 43) Part II, section 34 as amended SI 2015/1360.
25. The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended SI 2012/1889, SI 2014/656, SI 2015/1360.
26. The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894) as amended SI 2009/507, SI 2011/988, SI 2015/1360.
27. The Control of Substances Hazardous to Health (COSHH) Regulations 2002 (SI 2002/2677) as amended SI 2003/978, SI 2004/3386.

28. The Health and Safety at Work etc. Act 1974 (Application to Environmentally Hazardous Substances) Regulations 2002 (SI 2002/282) as amended SI 2007/1332, SI 2009/318.
29. Management of Health and Safety at Work Regulations 1999.
30. Safety Representatives and Safety Committees Regulations 1977.
31. Data Protection Act 1998.
32. [LAI Manual](#)
33. [SAI Manual](#)

# Document history

## Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	28/08/2008	SDIA	H - 22/06/2010	HSWIA	15/07/2021	RA	01/04/2013
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## Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Throughout	CHSES replaced with HSS due to department name change	04/05/2010
Throughout	PN712 has replaced PN190 and this policy has been updated to reflect this	02/06/2010
Page 4	Review period changed to 3 years	22/06/2010
Page 9	Reference to the Brigade photographer removed	22/06/2010
Throughout	Human Resources updated to Human Resources and Development throughout in accordance with Top Management Review.	16/02/2011
Throughout	Road traffic accidents/RTAs updated to road traffic collisions/RTCs as requested by Andy Roe.	11/09/2013
Last page	Subject list and FOIA exceptions tables added	16/12/2014
Throughout	Policy reviewed as current. Major changes made throughout and new sections and appendices added. Please read to familiarise yourself with the content.	13/10/2015
Throughout	Reference to PN712 – attendance management policy updated to PN889 – managing attendance policy.	21/02/2017
Throughout	Change of job titles due to role to rank	15/10/2019
Throughout	Changes made to reflect the changes in organisational structure and governance due to the abolition of LFEPA.	25/09/2020
Throughout	Minor changes made throughout – 2.1 introduces Sphera the new SERD database and additional information added to 7 Joint investigations	19/07/2021
Throughout	Cross references updated.	16/09/2022
Throughout	Reference to cancelled PN889 – managing attendance updated to PN1005 – supporting health and wellbeing.	28/03/2023



## Subject list

You can find this policy under the following subjects.

Environment	Health and safety at work
Investigations	

## Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

<b>Considered by:</b> (responsible work team)	<b>FOIA exemption</b>	<b>Security marking classification</b>