

Section 10

Managing Incidents



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Section Introduction

This section explains the practice of managing workplace incidents. It's important that you understand the reporting and investigation processes for incidents so that lessons can be learnt to prevent reoccurrence.

NOTE: HSW Advisors will take ownership of all incident investigations for suspected Lost Time Injury / RIDDOR Reportable Injury / RIDDOR Dangerous Occurrence / High-Potential Near Miss / High Potential Service Strikes where Thames Water is Principal Contractor. HSW Advisors shall manage the incident as soon as they are notified, uploading documents and records to SpheraCloud and completing the report and investigation. Supervisors, managers and contractors are required to engage and support the investigation.

The steps for managing incidents effectively for health and safety are:



Step 1 – deals with reporting and recording incidents, for example the procedure to follow and the timescales for reporting. **A summary of the process for managing incidents is attached to this document and can be displayed on the relevant notice boards within the workplace.**

Step 2 – explains the incident process and provides guidance on how to close them out effectively to prevent reoccurrence.

Step 3 – outlines the process for reporting and investigating all incidents which may culminate in an executive incident review.

Step 4 – explains the importance of identifying learnings from incidents and ensuring that these are recorded on SpheraCloud and actioned to avoid future similar incidents.

Step 5 – provides advice on managing and reporting visits from an enforcing body such as the Health and Safety Executive (HSE)



Step 1 – Incident Reporting and Escalation

Timely Reporting of the Incident

Good communications are essential for the effective reporting of workplace incidents. Report all incidents to your line manager as soon as possible. This may not be possible if the incident occurs during out of hours, so in this case report the incident to the duty manager at the earliest opportunity. Under normal circumstances this **MUST** not exceed 24 hours after the incident has occurred.

Essential facts about the incident must be noted:



- When did it occur, (including time of day)?

- What happened?

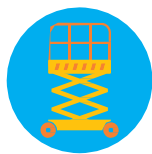


- Where did it occur?



- Who was involved, (including any witnesses)?

- What plant, equipment or substances were involved?



- Photos (help establish the incident's true nature and the environment in which it occurred)

General Data Protection Regulations

The personal information submitted will be used for statutory reporting and investigations and to plan, control and monitor protective and preventive measures by Health, Safety and Wellbeing teams, line and senior management.

Timescales for Incident Escalation, Reporting and Investigation

The principal tool used throughout this process is SpheraCloud, Thames Water's online system for reporting and investigating incidents. If you haven't already done so, ensure that you and your team members receive training from your Health, Safety and Wellbeing Advisor.

The table on the next page sets out the timescales for reporting and investigating incidents:

Incidents are classified in the following categories and must be carefully recorded and reported as follows:	Line manager	Inform HSW manager / advisor	Inform head of department / heads of HSW	Inform business unit executive	Inform Occupational Health	Record incident on Sphera - Cloud	Send LTI Home Safe counter reset	Submit significant Incident notification (SIN)	Complete incident investigation including SpheraCloud	Complete Local Incident Review (LIR) or Significant Incident Review (SIR) or Significant Illness OH Review (SIOHR)	Complete lessons learnt
Low / Medium near miss/Service Strikes no injury	1 hr.	1 hr.	-	-	-	24 hr.	-	-	21 days	-	-
High near miss / Service strikes / Dangerous Occurrence no injury	1 hr.	1 hr.	1 hr.	1 hr.	-	24 hr.	-	72hr.	21 days	21 days	21 days
First aid injury, non-lost time	1 hr.	1 hr.	-	-	-	24 hr.	-	-	21 days	-	-
Lost Time Injuries	1 hr.	1 hr.	1 hr.	-	1 hr.	24 hr.	24 hr.	Within 72 hr.	21 days	21 days	21 days
Injury Reportable under RIDDOR including specified injuries	1 hr.	1 hr.	1 hr.	1 hr.	1 hr.	24 hr.	24 hr.	Within 72 hr.	21 days	21 days	21 days
Absenteeism from SAD cases	24 hr.	-	7 Days	-	24 hr	-	-	Within 72 hr.	21 days	28 days	

Note: Managers must notify Occupational Health directly and within 1 hour of any work-related injury. Occupational Health will contact the injured party to carry out a health assessment and offer support. For all lost time injuries, complete the Lost Time 'Home Safe' Counter Microsoft form, [SHE 34](#) within 24 hours.



Step 2 – Incident Investigation and Close Out

NOTE: HSW Advisors will take ownership of all incident investigations for suspected Lost Time Injury / RIDDOR Reportable Injury / RIDDOR Dangerous Occurrence / High-Potential Near Miss / High Potential Service Strikes where Thames Water is Principal Contractor. HSW Advisors shall manage the incident as soon as they are notified, uploading documents and records to SpheraCloud and completing the report and investigation. Supervisors, managers and contractors are required to engage and support the investigation.

Definitions

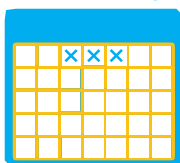
Injury



An incident that occurs from a work-related activity and requires first aid treatment. To be work related, there must have been something wrong with:

- The way in which the work activity was being carried out, including how the work was organised, how the work was supervised or how the work was being performed.
- The site, equipment, plant, tools, substances or materials used in the activity.
- The condition of the premises, including the structure or fabric of the building, the external areas forming part of the premises
- e.g. the ground conditions, the access platforms, the condition or design of floors, stairs and lighting where the work was taking place.
- The people, in relation to their training, competence or way in which they were carrying out the task that contributed to the incident.

Lost time injury



An injury that causes a person to be off from work for more than one day (shift) – this does not include the day of the incident.

If the individual attend GP/ Hospital for advice following a first aid injury and then returns to work the same day or the next day this will not be counted unless they are certified unfit for work.

Records Only



In some cases, an investigated incident shows that it was not caused by a work-related activity or the injured person aggravated a pre-existing injury. However, there may be some learning to share from it. Public road-related vehicle incidents will also be changed to the records only area for future information after the investigation is completed.

Near miss



Any event that doesn't lead to harm but does have the potential to cause illness or injury.

Safety observations



An unsafe act or condition where an object or situation is observed and can be challenged or resolved in order to prevent an incident occurring that could lead to loss. For example, identifying a damage cable.

Service strike



Damage to an underground or over ground service such as electricity cables, gas pipelines, buried electrical cables, water pipes, telecommunication cables, etc.

Loss of containment



An unplanned or uncontrolled loss of primary containment (LOPC) of any material including non-toxic and non-flammable materials from a process, or an undesired event or condition that, under slightly different circumstances, could have resulted in a LOPC of a material with hazardous consequences i.e. where there was a realistic and significant potential for loss of life.

Good practice



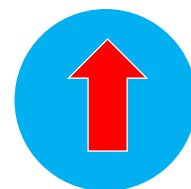
Actions, practices and behaviours that have been observed to go beyond expected standards and requirements also help to improve the effectiveness and efficiency of processes.

NOTE: Please see next page for definitions of severity of Near Misses and Safety Observations.

Near Miss and Safety Observation Severity

HIGH

Findings which expose the business, or individuals to serious risk if left un-addressed and/or have an urgent compliance, process, systems or customer implication



Conditions or behaviours which could lead to incidents that:

- Present a serious or imminent risk of major injury or ill health e.g. unguarded dangerous machinery, uncontained chemical leak, missing safety structures.
- Have a potential for major/severe damage, harm or loss.
- Are reportable or immediately reportable to the enforcing agency.

Serious breach of legislation, regulatory requirements or a corporate policy which:

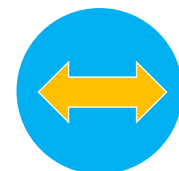
- Are likely to lead to formal action by the enforcing agency.
- Are very likely to lead to informal action by the enforcing agency.
- Are very likely to have a major adverse impact on the customer.

Serious management or system failures, which require immediate remedial action.

Serious customer impact if left unattended.

MEDIUM

Findings of an administrative/operational nature which expose the business or individuals to moderate risk if left un-addressed, and/or do not have an urgent compliance, process, systems or customer implication.



Conditions or behaviours which could lead to incidents that:

- Present a general risk of injury or ill-health e.g. contained chemical leak, damaged safety structures.
- Have a potential for moderate damage, harm or loss.
- Involve non-reportable lost time.

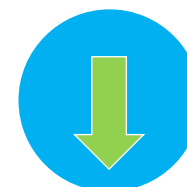
Minor breach of legislation, regulatory requirements or a corporate policy which:

- Are very unlikely to lead to formal action by the enforcing agency.
- Are unlikely to lead to informal action by the enforcing agency.
- Are unlikely to have a major adverse impact on the customer.

General management or system failures.

LOW

Findings of any nature which expose the business or individuals to low risk if left un-addressed, and/or have opportunities to improve effectiveness and efficiency of the process.



Any condition or behaviour which presents a low risk of injury or ill-health.

Conditions or behaviours which could lead to incidents that:

- Present a low risk of injury or ill-health e.g. faulty fire panel, trip hazard, first aid kit missing.
- Have a potential for minor damage, harm or loss.
- Would not require local first-aid treatment.

Suggestions for compliance, process, systems or customer improvements. - Conditions or behaviours which could lead to incidents that:

- Present a general risk of injury or ill-health.
- Have a potential for moderate damage, harm or loss.
- Involve non-reportable lost time.

Establishing Competence to Conduct an Incident Investigation

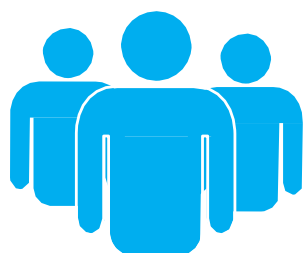
It's important that all workplace incidents are subject to thorough investigation in order to identify the root causes and prevent a reoccurrence. Managers must ensure that this is done effectively, either by themselves or a nominated person within their team who has done "Incident Investigation Training". They must understand how to complete the investigation forms currently within SpheraCloud. A user guide on how to complete these investigation forms is available from the SpheraCloud library.



You will need to complete four control questions (on SpheraCloud) for low and medium severity health and safety near misses and non-lost time injuries. And for high severity health and safety near misses, lost time injuries and service strikes, you'll need to complete a more detailed investigation form.

Taking the time to do this accurately and thoroughly can help prevent someone from being harmed in the future. It must be completed correctly as it may be used later in litigation.

Deciding the Level of Investigation and Setting Up the Investigation Team



The level of investigation (in terms of time and resources) should always be proportionate to the severity of the event and the likelihood of it recurring. When conducting an investigation, you may need to draw on the appropriate skills, knowledge and expertise of others. For example, when investigating an electrical incident, it would be necessary to contact an authorising engineer for assistance. Supervisors/managers are responsible for not only reporting the incident, as per the timescales within this manual, to their HSW team but also for undertaking the investigation. The HSW team will provide support and guidance including but not limited to: classification of the incident, the level of investigation required, what immediate steps need to be undertaken and guidance for next steps.

NOTE: HSW Advisors will take ownership of all incident investigations for suspected Lost Time Injury / RIDDOR Reportable Injury / RIDDOR Dangerous Occurrence / High-Potential Near Miss / High Potential Service Strikes where Thames Water is Principal Contractor. Supervisors, managers and contractors are required to engage and support the investigation.

Roles and Responsibilities of the Members of Incident Investigation Teams

Role	All Employees	Line Manager / Supervisor	HSW team including OH	Senior Management	Eversheds
Reporting of incidents	R		I	I C	C (depending on classification)
Reporting incident on SpheraCloud		R A	I		
Classification of incident			R		C
Undertaking initial investigation		R A	C		
Completing investigation		R A	R A C		I
Developing action plan		R A	R A		C
Leading incident review		C I	R A	C	I
Completing investigation report		R	R A		
Reviewing investigation report			R A		
Production of learning			R	C	
Sharing of learning		R A	R A	R	
Closing of SpheraCloud		R A	A		C
Reviewing SpheraCloud			R		
3 month review post investigation			R	R	

R = Responsible, A = Accountable, C = Consulted, I = Informed

Information gathering

At the beginning of the investigation you will need to collect all the information that you can about the incident. This will involve collecting basic information about the events that led up to the incident and the circumstances surrounding it. Establish at this early stage whether or not the incident actually occurred by asking such questions as: was it immediately reported to the line management, and was it witnessed that the incident



arose out of, or in connection with, a work-related activity. If there was an injury, find out if the injured person has any existing injuries that may have been aggravated by the incident.

To help you decide if the incident arose out of, or in connection with work, ask the following questions:

- Was there something wrong with the way in which the work activity was being carried out including, how the work was organised, how the work was supervised or how the work was being performed.
- Was there something wrong with the site, equipment, plant, tools, substances or materials used in the activity?
- Was there something wrong with the condition of the premises including the structure, or fabric of the building, the external areas forming part of the premises e.g. the ground conditions, the access platforms, the condition or design of floors, stairs and lighting where the work was taking place.
- Was something wrong in relation to the people carrying out the task that contributed to the incident, for example, their training or competence or the way in which they were carrying out the task.

It's important to assess each control question thoroughly to find out the potential cause of the incident and which category it falls into for the root cause analysis. It will also help to get these answers before you start to enter the information on SpheraCloud. Remember, where an answer is given negatively, you must add notes and, where possible, an action to ensure it is prevented in the future.

Question sets, ([SHE 32](#), [SHE 32a](#)), statement forms, ([SHE32](#), [SHE 33](#)), incident timeline template [SHE 32c](#), and a photo evidence guide, ([SHE 32b](#)), are available to help you gather all the necessary information to prevent a recurrence.

Analysis of the Data



Any data gathered (**from observations, interviews and documentation**) must be analysed to identify the causes of the incident. It is usually the case that any incident can be attributed to a variety of causes, and careful consideration of the data will enable you to establish the root cause.

For example, if an employee had been injured by a belt conveyor, observation of the scene might reveal that guarding had been removed. Interviews might reveal that it had been removed to help with cleaning and had not been replaced. Checking the specification might reveal that the equipment was not designed for the materials it was being used to transport, resulting in the need for constant cleaning.

Identifying Suitable Risk Control Measures

Analysis of the incident will reveal that risk control measures either failed or did not interrupt the chain of events leading to the incident, because they were not in place.

During this phase of the investigation it is necessary to draw up a list of risk control measures, which would prevent a similar occurrence. It may be helpful to discuss this with your local Health, Safety and Wellbeing Advisor. Continuing with the hypothetical example given above, suitable alternative control measures might involve including the belt conveyor on a maintenance schedule and training the operators to identify a particular type of defect.





Step 3 – Significant Incident / Illness Reporting and Review

Reporting

As per the escalation table on page 3 and the process flow on page 12 for all lost time injuries, the Lost Time *'Home Safe' Counter template, SHE 34*, must be completed within 24 hours of it being notified as lost time. All significant incidents shall be notified to the Thames Water Executive Team within 72 hours of the incident occurring via the Significant Incident Notification (SIN). Health, Safety and Wellbeing Advisor in conjunction with the local Managers, must complete and submit a *Significant Incident Notification (SIN) Template (SHE 35a)*. All reporting documentation will be issued by the central HSW team mailbox safetyhealthandwellbeing@thameswater.co.uk.

Review - work-related lost time injury – Significant Incident Review (SIR)

All cases of work-related lost time injury or illness must be reported, investigated and have a Significant Incident / Illness Review (SIR) undertaken. Also, service strikes of high voltage or high-pressurised gas mains must also have an SIR.

The SIR should be conducted by a member of the senior management team and a Health, Safety and Wellbeing Manager. As part of the review the *SIR template, SHE 36*, should be completed and presented at the review. SIRs will focus on immediate and tactical actions. Feedback from these reviews will be discussed with Operations Leadership Team /Executive Team meetings, with attendance and actions tracked as appropriate. Upload the LIR to SpheraCloud and send it to safetyhealthandwellbeing@thameswater.co.uk.

Review - work-related first aid or non-lost time injury – Local Incident Review (LIR)

All non-lost time injuries and low voltage service strikes will be reviewed at a local level with a relevant senior manager and the Health, Safety and Wellbeing Advisor for that area. All must take place within 21 days of the incident occurring. Upload the Local Incident Review (LIR) to SpheraCloud. (Note: form SHE 36 can be used for Local Incident Review).

Review – Absenteeism from SAD Cases – Significant Illness OH Review (SIOHR)

All cases of absenteeism arising from work-related Stress, Anxiety and Depression, (SAD), must be reported, investigated and have a Significant Illness OH Review, (SIOHR), undertaken. A clinical judgement will be made by the Occupational Health team as to whether cases are work-related. If cases are confirmed to be work-related, the Occupational Health team will inform the Line Manager and the HSW manager for the area.

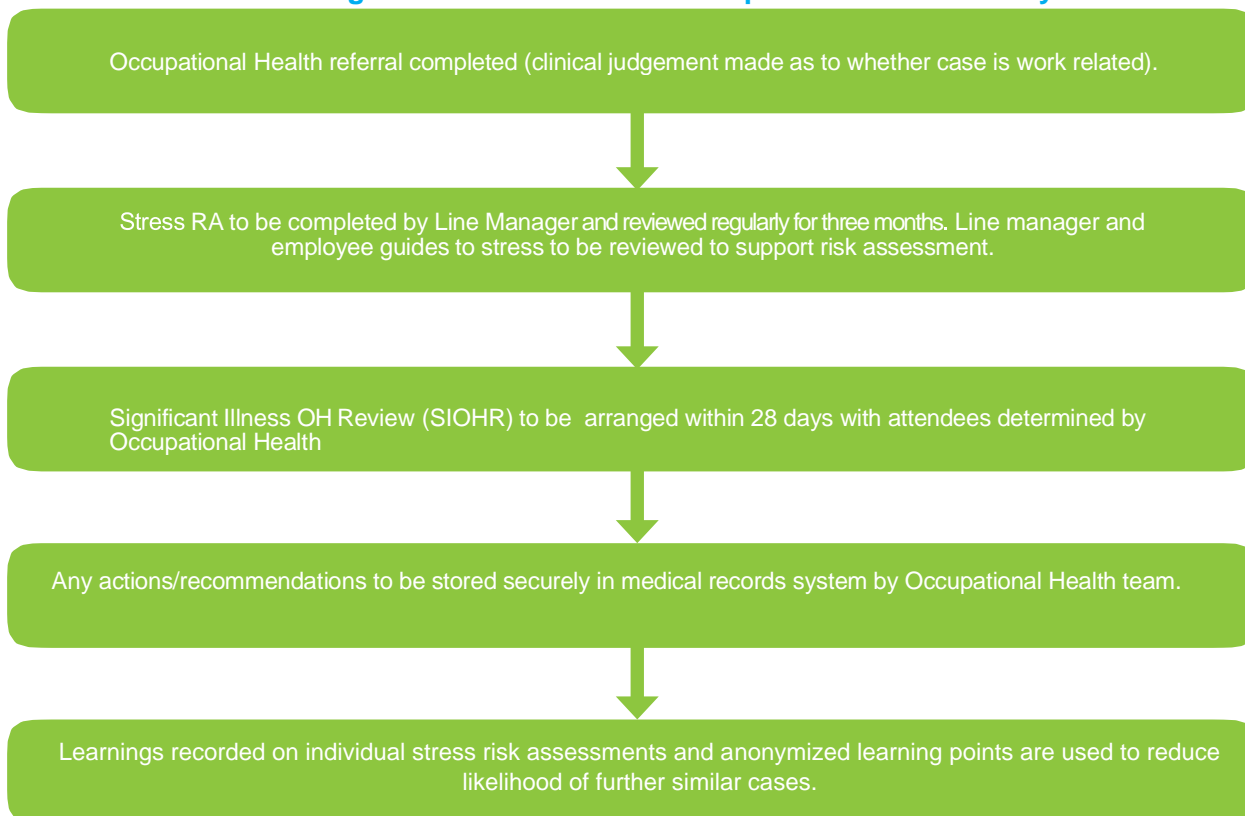
For all cases of work-related Stress, Anxiety and Depression (SAD), a Stress Risk Assessment should be completed by the Line Manager. This should be reviewed regularly for three months and will provide a record of the actions undertaken to conclude the episode. The Line Manager and employee guides to stress should be reviewed to support the Risk Assessment. These guides and the Risk Assessment template are located on the [OH SharePoint portal](#).

A Significant Illness OH Review, (SIOHR), meeting should be set up within 28 days. Attendees of the review meeting will be determined by the Occupational Health team, to ensure medical confidentiality is maintained and that all appropriated participants are invited.

Any actions or recommendations as well as timescales and responsibilities for completion from the review are stored securely in the medical records system by the Occupational Health team.

While Learning Bulletins identifying specific cases cannot be issued, any learnings are recorded on individual stress risk assessments and anonymized learning points are used to reduce likelihood of further similar cases.

Absenteeism from SAD Cases: Significant Illness OH Review - process flow summary



Resulting Actions From Significant Injury Review

As a result of the Significant Injury Review, add any resulting actions **Individually** and associated documents to the existing incident record within SpheraCloud with the agreed timescales for completion.

Investigation Completion

All investigations should be completed within 21 days with completion (including attendance at SIR's and LIR's) tracked and reported on, on a monthly basis. All actions arising from investigations will also be tracked and reported to the Operations Leadership Team, (OLT), / Executive team.

Extension for Incident Investigation Deadline

In certain circumstances it may not be possible to complete the incident investigation within the 21-day timescale. As such, an extension should be sort from the HSW Director (or their delegate if on leave) via email with the following information provided:

- Date of incident, date investigation due for completion and the requested extension date
- SpheraCloud reference number
- Summary of the incident, investigation findings to date and any immediate learnings identified
- The reason for the extension.

This extension request should be emailed to the HSW Director within the 21-day timescale and a copy of the extension email attached to the SpheraCloud incident investigation report.



Step 4 – Learnings from the Incident

Capturing the Required Actions and Learnings from the Incident

Identify any remedial actions required to prevent a recurrence of the event at this stage. It is absolutely essential to capture the learning from any incident and to ensure that they are applied in your own area and in other vulnerable areas of the business. Actions may range from providing appropriate training to maintaining or replacing plant or equipment. It is important to identify any company-wide actions, since an incident can have implications for the rest of the business as well.

Communicating and Embedding Learnings

Identify any learnings from the reviews and share them across the business, in the form of a [Learning Bulletin, SHE 37](#). Send the Learning Bulletin to safetyhealthandwellbeing@thameswater.co.uk. Learning bulletins will be uploaded onto the HSW Sharepoint page, with appropriate bulletins added to the TW H&S Hub (to allow contractors access). Relevant learning bulletins will be shared across the business through monthly performance reporting and as required will be issued from the HSW central team email address. These should be briefed to all employees, with records of briefings uploaded to SpheraCloud.



Step 5 – Enforcement Authorities Visits and Notifications



Thames Water will occasionally encounter representatives of the enforcing authorities i.e. the Health and Safety Executive, the Fire and Rescue Service, or the Local Environmental Health Officer. In many cases the contact will often follow a reportable incident or just be a routine visit. In all cases you will be acting on behalf of the company. Therefore, it is essential to be professional, polite and helpful.

Many enforcing authorities have the legal power to gain entry to premises, question persons under caution, and seize records and equipment as evidence. Consequently, make no attempt to obstruct them; however, it is reasonable to request that a Thames Water representative accompanies them while they are on our premises.

Whenever contact occurs, follow the process set out below:

Planned visit

Inform your senior manager, the duty control manager and your local Health, Safety and Wellbeing Advisor of the visit's details. Review and discuss the correspondence, with your local Health, Safety and Wellbeing Advisor, before the visit, so any required preparation and planning is done in advance. On the day, you, the Health, Safety and Wellbeing Advisor, and in conjunction with the enforcing authority must agree on any necessary action and record them on SpheraCloud. Keep all correspondence i.e., letters, notes from the meeting etc. locally, within the health and safety records file, and upload copies onto SpheraCloud.

Unannounced visit

Inform your senior manager, the duty control manager and your local Health, Safety and Wellbeing Advisor (who will join you as soon as possible to help and assist you) that you are meeting with a representative of one of the enforcing authorities. You, the Health, Safety and Wellbeing Advisor, and in conjunction with the enforcing authority must agree on any necessary action and record them on SpheraCloud. Keep all correspondence i.e. letters, notes from the meeting etc. locally, within the health and safety records file and upload copies onto SpheraCloud.

Management of Notifications to Health and Safety Executive (HSE)

Any notifications that need to be made to the HSE in accordance with Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, (RIDDOR), are managed through the Health, Safety and Wellbeing Systems and Reporting Team. Notifications are made following review and approval by either the Director of Health Safety and Wellbeing, or the Head of HSW Systems and Reporting, or their nominated delegate.

Reporting Minor / Significant Incident Process Flow Summary

Minor Incident Reporting

(non lost time injury, near miss low or medium including low or medium service strikes)



Significant Incident Reporting

(lost time injuries, RIDDOR reportable injuries and dangerous occurrences and high potential near misses including service strikes)

