

Procedure for the Reporting of Incidents and Cases of Occupational Ill Health

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| Approving Body | <i>Health, Safety and Environment Committee</i> |
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| Policy / Guidance Contact | <i>Health, Safety and Environment Team hasstaff@aber.ac.uk or 01970 62(2073)</i> |
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1.0 PURPOSE

- 1.1 To provide guidance on the reporting and investigation of incidents and cases of occupational ill health at Aberystwyth University (AU).

2.0 DEFINITIONS

- 2.1 Incident - any undesired or unplanned event that has caused or could have caused death, injury, ill health or damage to assets (loss), the environment or third parties.
- 2.2 Accident - any unplanned event that results in injury or ill-health of people, or damage or loss to property, plant, materials or the environment.
- 2.3 Near miss - any event, which under slightly different circumstances, may have resulted in injury or ill health of people, or damage or loss to property, plant, materials or the environment.
- 2.4 Dangerous occurrence -any incident that has a high potential to cause death or serious injury and is specified by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013, including failures associated with lifting machinery and pressure systems, scaffold collapse and explosion or fire.
- 2.5 RIDDOR - The Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013

3.0 SCOPE

- 3.1 Includes all events (incidents, accidents, dangerous occurrences or near misses) that caused (or had the potential to cause) harm to people, animals, facilities or the environment that arise on AU premises and/or as a result of AU activities.
- 3.2 Examples include events that involve or have the potential to involve: accidental injury; fire; electricity; gas; Dangerous Occurrences (such as explosion, collapse of buildings or scaffolding etc.), environmental incidents (such as pollution of watercourses) or violence.
- 3.3 Occupational ill health includes any work-related cause of ill health to staff and students, and ill health to others if caused by AU activities.
- 3.4 Cases of ill-health that are not related directly to AU activities (e.g. acute medical conditions or self-inflicted injury) should be reported by this procedure if first aid is administered by AU staff or students, or if the incident had the potential to cause harm to others.
- 3.5 This procedure applies to all Institutes and Professional Service Departments, staff, students, contractors, visitors and members of the public.
- 3.6 Incidents occurring from the Students' Union's own activities are subject to local reporting procedures, the outcomes of which will be discussed with the Health, Safety and Environmental Team either at the regular Students' Union Health, Safety and Environment Committee meetings or when an urgent need arises.

4.0 RESPONSIBILITY

- 4.1 Institute Directors and Heads of Professional Service Departments - To ensure the full implementation of this procedure. The Institute Director / Head of Professional Service Department can appoint a Health and Safety Co-ordinator to assist in this duty, in line with the Aberystwyth University Health and Safety Policy.
- 4.2 All members of staff and students - To promptly report all incidents or cases of occupational ill-health by completing Part A of the Incident Report Form.

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- 4.3 Health and Safety Co-ordinators - To investigate the circumstances of incidents, report to local management any weakness in current control systems identified that may have contributed to the incident, and ensure that relevant line managers are aware of the incident where their particular staff or students are involved.
 - 4.4 Managers and Supervisors - To respond to findings of incident investigations, understand any underlying reasons for the incident and take appropriate measures to prevent recurrence. To take charge of the local reporting process as appropriate (if the Health and Safety Co-ordinator is unavailable).
 - 4.5 Institute / Professional Service Department Health, Safety and Environment Committee - To monitor and review incidents that occur as a result of Institute /Departmental activities or facilities. Report findings to the Institute Director / Head of Professional Service Department and the AU Health, Safety and Environment Committee (the latter via the Health, Safety and Environment Manager).
 - 4.6 The Health, Safety and Environment Team- To receive incident reports (and notifications of employee ill-health attributed to work activities) and make further investigations if considered necessary; compile and analyse records of incidents for AU in order to identify trends and to advise on prioritised remedial measures; determine whether an incident is reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) and take appropriate action; maintain a central record of incidents.
 - 4.7 AU Health, Safety and Environment Committee - To receive regular reports on incident trends, and suggest supplementary action where considered necessary.

5.0 PRACTICE

- 5.1 When an incident occurs, any immediate emergency response must be the priority. However, key information relating to the incident should be recorded and logged as soon as possible. This can be done by the person/s involved or by colleagues if the person/s is/are incapacitated.

Parties and/or witnesses to an incident should make an initial note of the fundamental details such as date, time, name and contact details of person(s) involved, initial recollections of events, etc. Any additional documentation (such as photographs, emails and written statements) which can assist with the investigation process should be attached or included with the incident report form. Similarly, any physical evidence, such as broken machinery, should be protected and stored safely.

The Aberystwyth University Incident Report Form can be accessed at:
<https://www.aber.ac.uk/en/hse/proc-prac/incident-reporting/>.

Part A is to be completed by the reporting individual (usually in conjunction with their line manager). This section is to be completed as soon as possible following the incident (without jeopardising any immediate emergency response).

Health and Safety Co-ordinators should be informed promptly of all incidents and near misses in order to initiate and undertake an incident investigation. Part B of the incident report form is to be completed by the local Health and Safety Co-ordinator, documenting the main findings of internal investigations which will be either conducted or co-ordinated by the local Health and Safety Co-ordinator, and should be completed for every incident. If the Health and Safety Co-ordinator is not available then a relevant manager should take responsibility for this process. An investigation of all incidents should be conducted within three working days of the incident or event (or as soon as possible thereafter).



The relevant line manager or supervisor, who should already be aware of the incident, should liaise with the Health and Safety Co-ordinator, identifying and instigating any management changes necessary to prevent a recurrence.

If the incident occurs on AU grounds (other than sports areas) away from the immediate environs of buildings, or in communal areas in multi-user buildings, Campus Services staff would normally be responsible for completing the report form. However, this is not exclusively the case and the form can be completed by any appropriate person: the Health, Safety and Environment Team will subsequently ensure that the relevant manager in the Estates Department is informed as necessary (where the underlying cause is in the purview of that Department).

- 5.2 If the incident (or near miss) is judged to be serious (see section 7.1) the Health, Safety and Environmental Team must be informed as soon as possible.

Absence from work for more than seven consecutive days (including weekends if the person is unfit for work) caused by work-related accident or illness must be reported as soon as possible, and ideally within two days of the absence commencing.

Trivial incidents need not be reported, again a decision that requires an element of subjective judgement to be exercised in some cases. For instance, a 'paper-cut' to the finger would not normally be reported, whereas a cut from a modelling knife would be; burnt toast usually would not, but a grill pan fire needing extinguishing by fire blanket or other appliance would be.

- 5.3 Any incident involving fire (defined as a heat source that has to be extinguished by the use of firefighting equipment or the intervention of the Fire Brigade) should be reported immediately, or at the start of the next working day, to the Health, Safety and Environment Team (at hasstaff@aber.ac.uk or on extension 2073) and through subsequent completion of an incident report form once all required information is known.
- 5.4 Given the wide range and large numbers of events (not all relevant to HS&E) that are recorded in the AU student residences, further guidance on incident reporting is given in section 7.2.
- 5.5 A copy of the completed incident report form should be taken and stored as the Institute / Departmental record (after bringing it to the attention of the appropriate manager or supervisor). The original should be sent to the Health, Safety and Environment Team, who will investigate as considered appropriate, and copy reports of serious incidents to the AU Insurance Officer and others who have a legitimate need to have access. Institute / Professional Service Departments are to keep a record of all who receive extra copies of individual incident reports; similarly the Health, Safety and Environment Team will keep such records of copies made for others. Notification of all RIDDOR reports are to be communicated to the AU Health, Safety and Environment Committee.

The Health, Safety and Environment Team's Data Processing Declaration for incident reporting is given in section 7.3.

Note: If an individual is named in the report (typically the injured person) they are entitled to receive a copy of the completed report on request to the Health, Safety and Environment Team.

- 5.6 Records that involve people are subject to the Data Protection Act (1998) and any further data protection legislation (General Data Protection Regulation) due to be implemented in 2018, and as such access is restricted to those functions responsible for securing the health,



safety and welfare of persons at work, or for protecting persons other than persons at work against risk to health or safety arising out of or in connection with the actions of persons at work.

Such records should be stored for three years after the person has ceased to be a member of AU; or 40 years if the report concerns occupational ill-health or relevant exposure to hazardous materials with long-term health implications (such as asbestos); or three years after the incident if the person was not a member of AU; following which the paper records should be destroyed as confidential waste.

Electronic records, omitting personal details, can be kept indefinitely for statistical purposes.

6.0 REFERENCES

Aberystwyth University Incident Report Form

(<https://www.aber.ac.uk/en/media/departmental/healthsafetyenvironment/procedurespracticesforms/en-incident+occ-health-rep-new3.pdf>)

Data Protection Act 1998 (Stationery Office, London)

(<http://www.legislation.gov.uk/ukpga/1998/29/contents>)

The Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

(<http://www.hse.gov.uk/riddor/index.htm>)



7.0 APPENDICES

7.1 Guidance on 'seriousness' of an incident or health condition that requires immediate reporting.

Judgement will need to be exercised on what constitutes a **serious** incident. If in doubt seek advice from the Health, Safety and Environment Team.

Included would be:

- explosions;
- significant fire;
- serious vehicle collision;
- loss or escape of toxic chemicals or dangerous pathogens;
- collapse of scaffolding, walls or other parts of buildings;
- major electrical short circuits;
- malfunction of radiation generators;
- gas leaks;
- loss of oil or other polluting substances to watercourses or sewerage system;
- other incidents which have caused significant harm to people, or easily could have.

Also included are **major injuries**:

- all fractures, except to thumbs, fingers and toes;
- all amputations;
- any injury likely to lead to permanent loss of sight or reduction in sight;
- any crush injury to the head or torso causing damage to the brain or internal organs;
- serious burns (including scalding) which covers more than 10% of the body and/or causes significant damage to the eyes, respiratory system or other vital organs;
- any scalping requiring hospital treatment;
- any loss of consciousness caused by head injury or asphyxia;
- any other injury arising from working in an enclosed space which leads to hypothermia or heat-induced illness and/or requires resuscitation or admittance to hospital for more than 24 hours;
- certain occupational diseases such as carpal tunnel syndrome, severe cramp of the hand or forearm, hand-arm vibration syndrome, etc.



7.2 Guidance for Campus Services staff on reporting H&S matters concerning students in AU-owned or managed residential properties.

7.2.1 Primary involvement: Campus Services Staff

Determine whether any of the criteria in section 7.2.2 apply to the situation and, if so, then the standard procedure is to be followed. For incidents which involve concern(s) or threat(s) to student welfare, a copy of the completed incident report form should be sent to Student Support Services (in addition to the copies held by Campus Services and the Health, Safety and Environment Team).

Note: *It is expected that Campus Services Staff (Porters or Management) would normally be involved or summoned to such incidents.*

7.2.2 Relevant criteria which would initiate the incident reporting system in this context include:

- fire (flame or smouldering, that has to be extinguished by firefighting equipment);
- candles, or other devices with naked flames (e.g. oil lamps) whether lit or unlit;
- dangerous interference with safety equipment (e.g. smoke detectors, fire extinguishers etc.);
- notifiable disease;
- accidental injury;
- physical violence / assault;
- any occasion when first aid is administered (including cases of self-harm);
- unauthorised electrical equipment;
- blocking of escape routes (e.g. with bicycles, storage boxes, trunks etc.);
- air pistols, air rifles or firearms (real or imitation) - whether or not injury is caused;
- unauthorised entry into study bedrooms or flats;
- prowlers.

7.2.3 All cases of fire alarm activations should be reported via Security staff using the established fire alarm activation procedure. The incident report form need only be completed in addition in cases of actual fire.

7.2.4 Recognising that Campus Services staff work closely together, and are often jointly involved in managing an incident (or other situation), there should be an unambiguous agreement between all parties at the end of the incident who is to complete the report form/s.

7.3 Health, Safety and Environment Incident Reporting Data Processing Declaration

Summary

1. Aberystwyth University is a data controller under the Data Protection Act 1998 (DPA) and also under further data protection legislation due to be implemented in 2018.
2. The University's nominated representative is the:
Vice-Chancellor's Office
Aberystwyth University
Visualisation Centre
Penglais Campus
Aberystwyth
Ceredigion
SY23 3BF
3. The Health, Safety and Environment Team needs to process personal information regarding incidents and near misses so that it can:
 - Record details of all incidents and near misses ;
 - Investigate the causes of all incidents and near misses to prevent recurrences;
 - Allow the University to satisfy the statutory requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.
4. The reporting of incidents is a legal and statutory requirement for all employers, in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013. As a result, the lawful basis for processing this data is as a legal obligation. This ensures that the University is able to continually improve its health and safety management system, and thus meet its legal responsibilities in respect of the Health and Safety at Work etc. Act 1974.
5. The information collected for this purpose may be defined as sensitive or refer to special categories under the GDPR.

Details

6. The personal data of delegates is information collected by the completion of an incident report form following an incident or near miss. In instances where individuals have been affected or could have been affected by the event, this will include details such as name, department, address, telephone number, and email address. Incident report forms will also include details of the nature of any injuries sustained, and the contact details of any witnesses to an incident. The personal data included in Incident Report Forms will be used to:
 - Allow the University to report certain serious workplace accidents, occupational diseases and specified dangerous occurrences, in accordance with the requirements



of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013;

- Investigate the root causes of all incidents and near misses to prevent recurrences and establish facts;
 - Provide the University with a record of all incidents and near misses to have occurred arising from its activities.
7. The Finance Department will hold information relating to incidents resulting in personal injury and/or occupational ill health, which may be subject to litigation processes.
 8. Incident Report Form will be held for a minimum of three years, or until the statutory period until which an individual is able to bring a claim against the University has lapsed. For example, children have three years from the date of their 18th birthday in which to bring a claim.
 9. The Health, Safety and Environment Team will, in some circumstances, disclose some of the information provided to third parties. This will include the Health and Safety Executive (HSE), when the incident results in certain serious workplace accidents, occupational diseases and specified dangerous occurrences, as stipulated by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.
 10. Information may also, on occasion, be shared with the University's Insurers and/or legal representatives in instances where litigation due to personal injury or occupational diseases may be forthcoming.

Further Information

11. As a data subject, you have a range of rights in relation to the data that the University holds about you. Further information is available at:
<https://www.aber.ac.uk/en/infocompliance/policies/dp/data-subject-rights/>
12. For any further queries in relation to the above, please contact the Data Protection and Copyright Manager, Dr Jonathan Davies, at infocompliance@aber.ac.uk.