



Royal Mail Group

Safety, Health & Environment Standard

Standard 16.1 Incident Reporting & Investigation

Royal Mail Group Safety, Health & Environment Management System

Standard 16.1 Incident Reporting & Investigation

1.1 Overview

This Standard applies across the whole of Royal Mail Group (“RMG”) and sets out the arrangements for the reporting and investigation of all RMG Employee incidents, Third-Party incidents, Non-Injury incidents, Environmental incidents and incidents that are reportable under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

The prompt, accurate reporting of all incidents and a consistent, structured approach to investigation and root cause analysis provide RMG with an opportunity to prevent future incidents through the identification and implementation of effective risk management strategies.

In the context of this Standard, Royal Mail Group will be taken to include all UK-based Business Units, such as Operations (including Logistics), Commercial (including Parcelforce Worldwide, International, Royal Mail Specialist Services, Customer Experience and Sales & Channels etc.) and their Support Functions, such as Property, Engineering, Programmes, Assets, HR and Finance.

1.2.1 Definitions

For the purposes of this Standard an **accident** is defined as:

“a distinct unintended work-related event in which personal injury, ill-health or fatality **has** occurred.

and ‘work-related’ includes:

- an event that takes place that is directly connected to the Employee’s duties indoors or outdoors either on-site or off-site (off-site includes private property and the public highway) or
- an event that takes place whilst the Employee was not directly engaged in their duties but was on any RMG site including a car park, employee restaurant or any other recreational area such as rest rooms and RMG fitness centres.

a near-miss is defined as:

“a distinct unintended work-related event in which personal injury, ill-health or fatality **could have** occurred”.

Further information on incident definitions can be found in the Guidance Document (Appendix 2).

‘Injury & ill-health’ refer to:

- identifiable adverse physical or mental conditions arising from an accident or made worse by an accident. Injury and ill-health exclude progressive long-term ill-health conditions and cumulative exposures to situations which eventually cause injury (e.g. repetitive strain injuries).

All reported progressive long-term ill-health conditions and illnesses as a result of cumulative exposures that are not statutory reportable diseases will be reported and administered via the RMG Occupational Health Service provider (see Standard 12.1). Further information on injury and ill-health definitions can be found in the **Guidance Document (Appendix 2)**.

A “third-party” accident or near-miss includes:

- an agency employee, a casual employee, a member of the public, a Quadrant or ROMEK contractor and any other contractor or supplier (where the incident is on or within a RMG site covered by section 1.1 and/or the individual is involved in a RMG work-related activity for one of the Business Units, Regions or Support Functions referenced in section 1.1)

“Non-injury incident” refers to:

- Incidents that result in damage to premises, machinery, equipment and vehicles

Reporting and investigation requirements for non-injury incidents can be found in sections 1.2.4.2 & 1.2.6.

'ERICA' (Electronic Reporting of Incidents for Collation & Analysis) is the RMG online reporting system that must be used for reporting the following incidents only:

- Employee injuries as a result of a distinct unintended work-related event;
- Third-party injuries;
- Statutory dangerous occurrences;
- Statutory reportable diseases;
- Road Traffic Accidents ("RTAs") involving Royal Mail operational vehicles;
- Environmental incidents.

1.2.2 Responsibilities

The Group Safety, Health & Environment (SHE) Risk & Improvement Manager is responsible for the development of the RMG Incident & Reporting procedure as detailed in the RMG Incident Reporting & Investigation Flowchart (Appendix 1). This includes maintaining all associated materials and templates such as a Guidance document (Appendix 2), a RMG Safety Root Cause Analysis (S-RCA) investigation template (Appendix 3) to be used as a minimum for all Non-Fatal & Non-Serious Employee and Third-Party investigations, a RMG Incident Types & Investigation Questions (Appendix 4) document and an associated S-RCA guidance document (Appendix 5).

The Group SHE Risk & Improvement Manager is also responsible for maintaining an electronic RMG Near-Miss Database so that a record can be kept of all reported RMG Employee and Third-Party near-misses.

The Group SHE Management Systems Manager is responsible for the development of the associated Serious & Fatal Incident Reporting and Investigation procedure and all associated materials, templates and circulation lists (see Standard 16.2).

SHE Technical Specialists, for example in Property and Engineering, are responsible, where appropriate, for providing support to those managers carrying out incident investigations where they require specific technical advice.

The Group Property Head of Assurance is responsible for maintaining a Group Property damage report database so that a record can be kept of all reported damage to property.

1.2.3 Fatal & Serious Incidents

Any manager who receives notification of an incident that is or which has the potential to be a fatal or serious incident will contact Central Postal Control (CPC) immediately so that consideration can be given to the need to investigate the incident in line with the Serious & Fatal Reporting and Investigation Process (see Standard 16.2). This includes incidents that are classified as a Dangerous Occurrence under RIDDOR (see Appendix 2) and incidents resulting in exposure to carcinogens, mutagens and biological agents.

1.2.4 Non-Fatal & Non-Serious Employee Accidents

1.2.4.1 Reporting Obligations (Employee)

All accidents (distinct unintended work-related events in which personal injury (regardless of severity), ill-health or fatality has occurred) must be notified to a Manager by the Employee affected (or any other person where the Employee is unable to make this notification in person). Every effort should be made to notify a Manager at the earliest opportunity but in every case within 24 hours so that a prompt investigation can be initiated and, where applicable, ensure that the accident can be reported to the Health & Safety Executive (HSE) as required by RIDDOR.

Where a report of an accident is made by an employee outside of this timescale the reporting obligations of the manager, as detailed in section 1.2.4.2 below, must still be applied. The reason for the delay should be noted in the investigation details.

1.2.4.2 Reporting Obligations (Manager)

Upon receiving notification, the Manager will check on the condition of the Employee and where required arrange any medical response. The Manager must ensure that the details of the accident, including the incident type (see RMG Incident Types & Investigation Questions (Appendix 4)) and the injury (s) or ill-health sustained (based on the injury details available at the time the incident is reported) is recorded in Part 1 ('Injury Details') of the ERICA system (or any future replacement system) at the earliest opportunity.

Where a Specified Injury as defined by RIDDOR (see Appendix 2) has been confirmed verbally or in writing by a Registered Medical Professional (RMP) a record of the Specified Injury in ERICA will be made without delay so that the accident can be reported to the Health & Safety Executive as required by RIDDOR. In cases where the injury has not yet been confirmed by a RMP but is believed to be a Specified Injury the accident will be recorded in ERICA without delay based on the details of the injury known at the time or by selecting the closest available injury type e.g. a sprain (see Notifying the Accident Reporting Centre below).

The Manager dealing with the accident will ensure that a signed copy (Part 1) of the accident (signed by both the Employee and the reporting manager) is printed and filed in the local ERICA folder and a copy is provided to the Employee.

In all cases where a manager requires further advice as to the reporting requirements of an accident (including the definition of an accident) they should refer to the Guidance Document (Appendix 2) or seek advice from the Regional or Business Unit or Support Function SHE Field team.

In cases where first aid was administered to an injured employee in relation to a work-related accident and an entry was made in a local first aid book (where one existed) this does not on its own meet the RMG accident reporting requirements as detailed in this Standard. The reporting obligations as detailed above must also be followed.

Road Traffic Accidents

Additionally for all RTAs the Manager will ensure that the accident is reported in line with the appropriate Business Unit RTA Procedure and that the details are also recorded on the 'Road Traffic Accident (RTA)' section of the ERICA system in accordance with the RTA Procedure timescales.

Sick Absence

At the earliest opportunity the Manager will ensure that any reported sickness absence directly related to the accident is reported and administered in accordance with the RMG Attendance Policy.

Notifying the Accident Reporting Centre

In the event that the ERICA system is unavailable and a Specified Injury as defined by RIDDOR (see Appendix 2) has been confirmed by a RMP the Manager must contact the Accident Reporting Centre (accident.management@royalmail.com) to report the accident. In all other cases a manual record of the details should be taken and entered into the ERICA system at the earliest opportunity.

In the event that the Manager subsequently receives notification from the Employee that there has been a change to the severity of the injury and/or ill-health initially reported the Manager will notify the Accident Reporting Centre (accident.management@royalmail.com) at the earliest opportunity so that the ERICA record can be updated accordingly.

In the event that the Employee, as a result of their injuries sustained in an accident, is unable to perform routine work duties for more than seven consecutive days (including weekends and rest days but excluding the day of the accident) and either performs non-routine duties; or takes sickness absence followed by a return to work to perform non-routine duties the Manager will notify the Accident Reporting Centre (accident.management@royalmail.com) at the earliest opportunity to ensure that the accident can be reported to the HSE as required by RIDDOR.

Damage to RMG Property

The Manager will ensure that any related damage to property as a result of an accident (including street furniture), fittings and wheeled equipment is reported to the RMG Property Helpdesk indicating a priority for repair. The RMG Property Helpdesk will be responsible for recording the damage on the Group Property damage report database. The Manager must ensure that where the equipment has become unsafe it is taken out of service pending repair. Damage to machinery such as IMPs, FSMs etc. should be reported locally to the Plant Engineering Manager (or equivalent) or in the case of a Mail Processing Unit, the Regional Maintenance Manager (or equivalent).

1.2.4.3 Investigation

Employee

The Employee will, where they are physically able, ensure their participation in the accident investigation including any re-enactment. Where appropriate the Manager will make all necessary arrangements to facilitate the Employee's participation in the investigation such as arranging travel to the accident location.

Manager

The Manager must ensure that an investigation is instigated, using the RMG S-RCA template (Appendix 3), where possible without delay. The investigation should be carried out in line with the RMG S-RCA guidance document (Appendix 5) with the number of investigation team members being proportionate to the severity of the accident. In normal circumstances the investigation should be concluded within 7 days and the ERICA entry completed by entering all of the required details in Part 2 ('Investigation') of the 'Employee' section. The ERICA and the S-RCA both need to be completed in line with this Standard.

In cases where an investigation has been completed and the investigating manager concludes that the incident is not reportable on ERICA as an accident, the employee should be notified and given an explanation for the decision at the earliest opportunity. If the employee disagrees with the decision they should refer to their relevant Union Area Safety Representative who may consider the use of the Dispute Resolution Process (see Standard 5.1).

The Manager is required to ensure that a copy of the S-RCA and all associated investigation paperwork is filed locally and retained for a minimum of six years (with the exception of an Exposure to a Hazardous Substance incident where all relevant paperwork should be retained for a minimum of 40 years (see Standard 1.14).

Road Traffic Accidents

Additionally for all RTAs the Manager must ensure that the investigation is conducted in line with the appropriate Business Unit RTA Procedure and in accordance with the RTA Procedure timescales. The Manager will ensure that any RMG vehicle involved in the RTA is in a roadworthy condition before it is returned to service.

1.2.4.5 Accident away from the Employees base location

In cases where the accident has taken place on another RMG site that is not considered to be the Employees 'normal' or 'base' location, the Employee will if at all possible notify a manager on-site before returning to their base location. If they are unable to report the incident before leaving they must report it to their Line Manager as soon as possible after their return to their home office and in every case within 24 hours.

The Manager on-site will check on the condition of the Employee and where required arrange any medical response. The Manager on-site will ensure that the details of the accident are recorded in ERICA and will instigate the investigation on the basis that they will have more knowledge of the accident details and that following the investigation they will be responsible for implementing any identified site-related control measures that are necessary (this responsibility will apply even if the Employee did not notify a manager on-site at the time of the accident and returned to their base unit).

Whilst the Manager on-site has the overall responsibility for completing the ERICA and the subsequent investigation, this should be done in conjunction with the Employee's Line Manager if at all possible. The Employees Line Manager will assist the Reporting/Investigating Manager by providing any necessary details of the Employee/vehicle etc. and in the completion of any enquiries with the Employee or any witnesses.

1.2.5 Non-Fatal & Non-Serious Third-Party Accidents

1.2.5.1 Reporting

Upon receiving notification of an accident involving a third-party, the Manager will ensure that the accident details, including the incident type as defined in Appendix 4 and the injury (s) sustained, are reported in Part 1 ('Injury Details') of the 'Third Party Incident' section of ERICA. In cases where the Third-Party is taken from the site of the accident to hospital for treatment of the injury(s) sustained, the Part 1 entry will be made without delay in line with the RIDDOR requirements. In all other cases the ERICA entry will be made as soon as all relevant details have been obtained.

For accidents involving agency personnel, the Manager will, in addition to completing an ERICA, ensure that a copy of the accident report is provided to the appropriate Employment Agency. For accidents involving a Quadrant or ROMEK employee or any other contractor the Manager will, in addition to completing an ERICA, notify the RMG Property Helpdesk.

1.2.5.2 Investigation

The Manager will ensure that an investigation is instigated using the RMG S-RCA template (Appendix 3) at the earliest opportunity. Wherever possible the investigation should be concluded within 7 days and the ERICA entry completed by entering all of the required details in Part 2 ('Investigation') of the 'Third-Party Incident' section. The Manager will ensure that a copy of the S-RCA and all associated investigation paperwork is filed locally and retained for a minimum of six years (see Standard 1.14).

In all cases where a manager requires further advice in relation to the investigation of an accident they should seek advice from the Business Unit, or Region SHE Field team.

1.2.6 Non-Injury Incidents

1.2.6.1 Damage to a Royal Mail Group operational vehicle

In all cases where there has been damage to a RMG operational vehicle the Manager will report the incident in line with the appropriate Business Unit RTA Procedure and record the details in the 'RTA' section of the ERICA system in accordance with the RTA Procedure timescales.

The Manager will ensure that an investigation is completed in line with the appropriate Business Unit RTA Procedure using the RMG S-RCA template.

1.2.6.2 Damage to RMG Property

See section 1.2.4.2 Damage to RMG Property

1.2.7 Near Misses

Upon receiving notification of a near-miss involving an Employee or a Third-Party the Manager will ensure that at the earliest opportunity the details of the near-miss are recorded on the RMG Near-Miss Database and an investigation is completed using the RMG S-RCA template (Appendix 3).

The Manager will ensure that a copy of the S-RCA and all associated investigation paperwork will be filed locally and retained for a minimum of four years.

Where personal injury or ill-health has occurred as a result of a distinct unintended work-related event it must be reported in line with section 1.2.4 above. The near-miss database must not be used.

1.2.8 Environmental Incidents

Upon receiving notification of a fuel spillage or flood, the Manager will respond to the incident in accordance with the Unit/Depot RMG 'Stay Calm' folder. For all other environmental incidents as defined in Appendix 2 the Manager will report the incident to the RMG Property Helpdesk.

In all cases the Manager will ensure that an ERICA report and investigation (using the on-line Environmental Incident Investigation Template) are completed and submitted within 7 working days. A copy of the ERICA entry will be filed locally and retained for a minimum of six years with the exception of incidents that involve contamination of land where copies will be retained for 15 years (see Standard 1.14)

In all cases where a manager requires further advice in relation to the reporting and investigation of an environmental incident they should seek advice from the RMG Property Helpdesk.

1.2.9 Reportable Diseases

Upon receiving written notification from an RMP that an employee is suffering from a reportable disease (as defined in Appendix 2) linked to work activity, the Manager will ensure that a report is completed within the 'Statutory Reportable Diseases' section of ERICA without delay and the incident is dealt with in accordance with the process set out in Standard 12.1.

1.2.10 RIDDOR Reporting & Internal Notification Requirements

For Serious & Fatal incidents the Group SHE Management Systems Manager will ensure the HSE is notified of all RIDDOR reportable incidents and will maintain internal circulation lists to ensure that appropriate RMG Senior Managers are notified accordingly.

For Non-Serious & Non-Fatal incidents the Incident Reporting Systems Manager will ensure that the HSE is notified of all RIDDOR reportable incidents and will maintain internal circulation lists to ensure that appropriate RMG Senior Managers are notified accordingly.

Subject to the above, the Business Unit, Region or Support Function Operational Leadership Teams, in conjunction with the Business Unit, Region or Support Function Head of SHE, will be responsible for determining and maintaining internal circulation lists for reporting details of incidents and sharing copies of completed S-RCAs within the Business Unit, Region or Support Function. The designated Manager will ensure relevant incident details and reports are circulated in line with this list.

1.2.11 Union Safety Representatives (CWU & CMA/Unite)

RMG will follow the principles of the HSE model contained in HSG245 entitled "Investigating and Reporting Accidents and Incidents- A workbook for Employers, Unions, Safety Representatives and Safety Professionals".

In accordance with these principles, the 'RMG/CWU Notification of Accidents to Safety Representatives, Accident Investigation & the Provision of Accident Report Form Copies Agreement' (the Agreement) and to maximise the value of investigations, the Manager should proactively involve, consult and inform Area Safety Representatives of accidents (including Serious & Fatal), dangerous occurrences and near-misses.

The Manager dealing with an employee accident will ensure prompt notification of all accidents to the relevant Area Safety Representative and provide an accurate, complete and legible copy of all Accident report forms as soon as possible.

Further information on notification, investigation and the provision of report copies can be found in the Agreement and the RMG/CWU Reporting & Recording Accidents Safety Representatives Issue Escalation Process Agreement.

1.2.12 Supporting Arrangements

In order to aid investigations and support compliance with this Standard, the implementation of arrangements within the Business Unit, Region or Support Function (such as incident-related senior manager conference calls supported by the relevant SHE Advisor) should be considered and implemented where they are considered beneficial.

The 'Incident Alert Template Example' (Appendix 6) can be used by Unit Managers to cascade the learning from an incident to colleagues running similar operations to help reduce the likelihood of a repeat occurrence.

1.3 Communication

The Safety, Health & Environment (SHE) Engagement Manager will ensure that appropriate communications materials are maintained to deliver the necessary communications for compliance with this Standard. A notification on the deployment of or amendment to this Standard or its supporting materials will be sent by the SHE Engagement Manager to the SHE Community and to affected employees through the most appropriate communications channels.

1.4 Audit

The Group SHE Audit & Performance Manager will maintain audit programmes to monitor compliance with this Standard. The relevant Head(s) of SHE in Service Provision will ensure that where applicable the audit programme operates effectively in the Business Units, Regions or Support Functions they support.

1.5 References

- Incident Reporting & Investigation Flowchart (Appendix 1)
- Guidance Document (Appendix 2)
- RMG S-RCA Template (PDF) (Appendix 3)
- RMG Incident Type & Investigation Questions (Appendix 4)
- RMG S-RCA Guidance (Appendix 5)
- Incident Alert Template Example (West Region) (Appendix 6)
- Standard 16.2 Serious & Fatal Incident Reporting & Investigation
- Standard 5.2 Dispute Resolution
- Standard 12.1 Health & Wellbeing Risks & Benefits
- Operations & PFW RTA Procedures
- RMG Attendance Management Procedure
- CWU/RMG Health & Safety Representation & Consultation Agreement
- RMG/CWU & RMG/CMA Accident Reporting Agreements
- [Link to RMG Near Miss Database](#)

Version No.	Date of Change	Author	Element Owner	Technical Review by	Approved By	Description of change	Review Date
1.0	31.07.2015	J. Hosking	J. Hosking	S. White	S. Davis	Initial Group Deployment	31.07.2017
1.1	31.07.2016	J. Hosking	J. Hosking	S. White	S. Davis	Review to accommodate feedback	31.07.2018
1.2	20.12.2016	J. Hosking	J. Hosking	S. White	S. Davis	Addition of points of clarity	20.12.2018