



1. Introduction

The purpose of this document is to set out the procedure for recording and reporting accidents, incidents, close calls, Enforcement Authority Communications (both internally and externally) and instances where Business Continuity Plans are used, and the process required for investigation.

For the purpose of this procedure accidents and incidents include accidents, dangerous occurrences and occupational diseases arising out of or in connection with work and reportable under RIDDOR (UK)/Accident Reporting (Ireland).

2. Scope

This procedure applies to all Veolia locations and activities. Where local reporting procedures exist they must satisfy the requirements of this procedure.

3. References

Data Protection Act 2018
Management of Health and Safety at Work Regulations 1999 (Approved Code of Practice & Guidance) L21
Social Security Administration Act 1992
Social Security Contributions and Benefits Act 1992
Social Security (Industrial Injuries) Prescribed Diseases Regulations 1985
Social Welfare (Consolidated Occupational Injuries) Regulations 2007
The Social Security (Industrial Injuries) (Prescribed Diseases) (Amendment) Regulations (Northern Ireland) 2019
Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
AVA electronic Risk and Assurance reporting software
Environmental Permitting (England and Wales) Regulations 2010
Environmental Protection Act 1990
Regulatory Enforcement and Sanction Act 2008
The Environmental Civil Sanctions (England) Order 2010
The Environmental Civil Sanctions (Miscellaneous Amendments) (England) Regulations 2010
SYS/2/007 Complaints
SYS/2/028 Business Continuity Management
The Safety Health & Welfare At Work (Reporting of Accidents & Dangerous Occurrences) Regulations 2016

4. Definitions

Accident:	An event which results in personal injury or death and which arises out of and in connection with Veolia undertakings
CAR:	Compliance Assessment Report issued by the Environment Agency
Civil Sanction:	Civil Sanctions are available to the Environment Agency and Natural England for England only and include: Compliance Notice, Restoration Notice, Enforcement Undertaking, Fixed Monetary Penalty, Variable Monetary Penalty, Third Party Undertaking and / or a Stop Notice
Close call	An issue which has been identified or observed that has the potential to cause an accident, incident or environmental damage (previously known as near miss / safety concern) which arises out of and in connection with Veolia undertakings



Compliance Classification Scheme (CCS):	That part of OPRA relating to site inspections, categorised as breaches of permit conditions based on a score 1 to 4, and no score for compliance, depending on potential environmental impacts
Dangerous Occurrence:	An occurrence which arises out of or in connection with work and is of a class specified by RIDDOR Schedule 2 (UK) / Safety, Health & Welfare at Work (Ireland)
Enforcement Authority Communication:	Visit by / communication with enforcement regulator, e.g. HSE / HSA, Environment Agency / Police etc. in connection with work activities including but not limited to: <ul style="list-style-type: none">• Enforcing Authority site inspection/audit reports• Non-routine letters and/or requests• Warning or enforcement notices, formal caution• Notice of Intent / Civil sanction• Summons for PACE interview / to court• Positive communications
Enforcing Authority:	The body responsible for enforcing legislation relating to the event that occurred (e.g. Health and Safety Executive / Authority, Local Authority, Environment Agency, etc.)
Incident:	An event that causes damage to property, equipment or the environment or that results in production / revenue losses but does not incur injury or ill health
Investigation:	A process which is carried out in response to an event
IP (Injured Party)	This refers to an injured party and is the term used in all reports rather than submitting personal information
Notice of Intent:	Typically, civil sanctions require a 'notice of intent' to be served. This provides the recipient with the opportunity to make representations before a decision is taken to impose a civil sanction
OMA:	Operator Monitoring Assessment (relating to emissions to air)
OPRA:	Operational Risk Appraisal for Waste Facilities and Installations
PACE:	Police and Criminal Evidence Act
Prescribed Occupational Disease:	Where a written statement prepared by a registered medical practitioner diagnosing a prescribed occupational disease which is specified in relevant legislation (country dependant), and is a result of exposure to specific hazards
Responsible Person:	A person who is a Veolia employee, who for the time being has control of the premises in connection with carrying out Company activities, at which the accident, death, close call, dangerous occurrence or prescribed occupational diseases happened

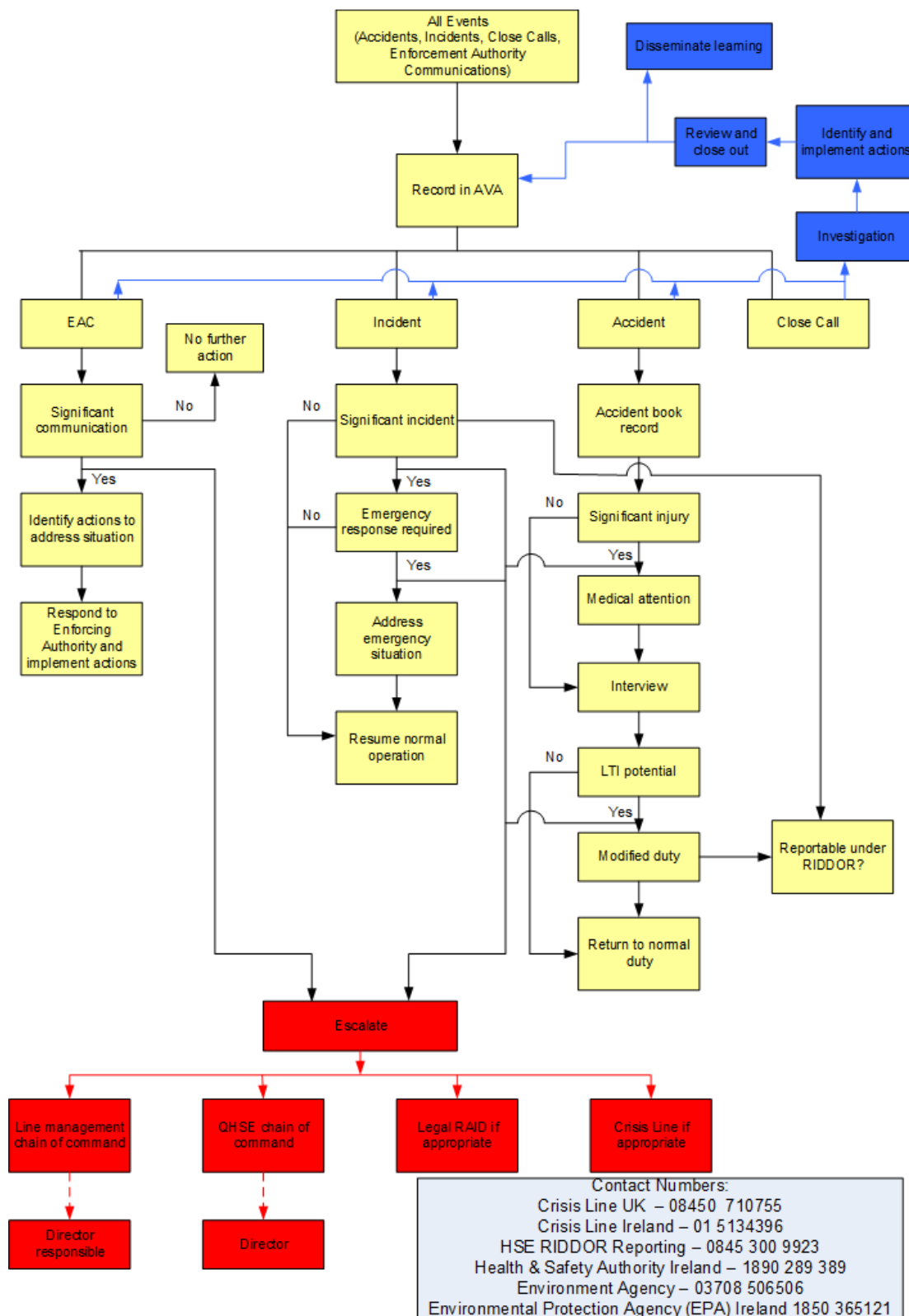


RIDDOR: Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (not applicable in Ireland)

The Manager: Where used within this procedure refers to the manager with direct responsibility for the Site / Contract / Location / Department / Portfolio of sites regardless of actual job title



5. Procedure





5.1 Responsibilities

The Manager at the location at which the event occurs is responsible for ensuring that relevant details are reported internally and externally within the timeframes contained within the procedure (section 5.2.3)

All employees have a legal responsibility to report all accidents, incidents and close calls as well as comply with all instructions and training given to them, written or verbally in relation to this document.

The Risk & Assurance (R&A) team are responsible for ensuring all accidents / incidents are reported as necessary to the Health & Safety Executive / Health & Safety Authority (section 5.3.2)

5.2 Reporting Requirements

Once an event has been reported, the manager or nominated person must ensure the event has been uploaded onto AVA within the timeframe set within this document

Reporting requirements include:

- for all events, entering information onto AVA within 24 hours
- for accidents, entering information into the statutory accident book
- escalating information up the management chain and to R&A as required. (See subsequent sections and flow diagram at the beginning of Section 5 for escalation information)
- reporting to external bodies/authorities including for example submissions required under RIDDOR/Accident Reporting (Ireland), notifications of breaches of Permit limits or failure of techniques
- escalating to other internal departments for example legal, risk and insurance, as required
- including relevant information in investigation and management reports
- reporting any instance where a site's Business Continuity Plan has to be invoked. See SYS/2/028 the procedure for Business Continuity Management

Accidents occurring on customers' premises should be recorded whilst on site in the customer's accident book and in the accident book held at the location at which the injured party is normally based.

Records of all events must be made as soon as possible after the occurrence to reduce the likelihood of relevant information being lost or forgotten. All events must be recorded onto AVA within 24 hours of the event occurring

Records of all events must be retained in a form and location which is secure, but from which the information can be easily and readily retrieved. In some cases the information will include personal details, the confidentiality of which must be protected and preserved. Retention periods differ depending on the type of record. For the sake of simplicity all event records must be retained for a period of not less than seven years or, in the case of occupational health or work related disease records, not less than forty years.

Should an event (including accidents resulting in serious injury, any dangerous occurrence or environmental impact /damage) occur which it is considered may subsequently be the subject of litigation, the following should happen:

- A decision shall be taken to determine if a Root Cause Analysis team is required in accordance with Process Flow for RCA (Document SYS/2/037/005).
- The leader of the RCA team will ensure that the requirements of Process Flow for RCA are established and followed.
- Aftermath of an Accident – Things to Remember (Document SYS/2/037/007) should be used to determine how to manage the legal context of these events,
- The advice of the legal department must be sought to ensure that, where necessary, information is communicated in a manner which does not compromise legal privilege.



Actions arising out of events, including those identified during the course of event investigations and from communication with Enforcing Authorities, must be recorded in AVA and actions set with appropriate deadlines and responsibilities. Actions taken must be reviewed to confirm that they have delivered the required outcome. Every effort should be made to ensure that actions are closed out at the earliest opportunity.

5.3 Health, Safety and Environment Notification – Internal

It is recognised that not all staff have access to AVA, therefore; a paper-based recording system is acceptable for the immediate logging of information. The mobile application will remove this. The generic template can be used to record as much detail as possible. See SYS/2/037/008 as a typical example.

Any employee who identifies a close call should in the first instance, raise it promptly with their immediate supervisor or manager and / or their local safety representative.

The completed reporting template must be submitted to the immediate supervisor / manager as soon as possible.

The Manager must record the findings on AVA including any action to be taken to address the issues identified. A record of the action taken must also be recorded on the form. The Manager must retain the original and return a copy to the originator.

Where observations relate to third party locations, the Manager must follow up remedial action(s) with the third party (e.g. customer, Local Authority, client etc.) as appropriate.

5.4 Health, Safety and Environment Notification & Communication – External

A record of all Enforcement Authority communications (as defined in Section 4 above) must be made in AVA. Where an action is required in response to a communication the action must be taken as soon as possible and a record made in AVA including a copy of any written response.

Note: A communication from an Enforcement Authority which simply passes on the details of a complaint received should be recorded in accordance with SYS/2/007 (Complaints) and not this procedure

Notifications required to be made to Enforcing Authorities and/or clients and customers must include, wherever possible, details of the event(s) and any actions taken or to be taken to remedy the situation. This may include:

- RIDDOR/Accident Reporting (Ireland) reportable events
- notifications of Permit limit breaches
- failure of operating techniques
- notifiable emergencies

Details must be escalated up the management chain and to R&A.

A communication from an Enforcing Authority which includes a formal notice (warning letter, improvement or prohibition notice, notice of intent to impose civil sanction, invitation to attend PACE interview etc.) must be escalated immediately up the management chain, to R&A and to the legal department.

Emergency situations (those which require an emergency response and/or involve attendance by the Emergency Services) must be reported immediately up the management chain, to R&A and via the Crisis Line.

An overview of escalation requirements can be found at the beginning of Section 5 of this procedure

5.5 Investigation

All accidents & incidents must be investigated with immediate and root causes identified and actions taken to prevent recurrence determined and implemented. The time spent undertaking an investigation should be proportionate to the severity of the event



All close calls which have the potential, in different circumstances, for a serious injury or significant damage to property / equipment to arise must be investigated

Investigations should be conducted and records made as soon as possible after the event. The advice and involvement of R&A should be sought in relation to all significant events.

Investigations must take into account the need to preserve evidence for scrutiny by the relevant authorities in cases where external investigation of an event is likely.

Accident, incident and close call reports must contain only factual information gathered at the scene of the event directly and/or via relevant and reliable witnesses and must only draw conclusions based on those facts.

The process for undertaking Investigations should include:

- Utilising expertise from across the business
- The provision of all relevant task risk assessments and safe systems of work
- Taking statements from the IP and/or witnesses
- Gathering supporting documentation including CCTV, vehicle footage or pictures
- Identifying any breaches of statute or company policy
- Establishing root cause
- Identification of any measures to prevent recurrence

For all lost time incidents, modified duties and events with potential for a serious injury or significant damage, a formal review process is required over a 10 day period in line with SYS/2/037/009 (7 & 10 day reviews)

5.6 Reports

All events should be recorded on the AVA system by the relevant Manager or Supervisor, giving details of any corrective actions taken.

5.7 Records

The Manager must retain copies of the completed forms for a minimum of 5 years.

6. Variation

None.

7. Documentation

Reference No	Title	Minimum Retention Period
SYS/2/037/002	LTI / MDI or Potential LTI Flowchart – Actions & Escalations	N/A
SYS/2/037/004	Witness Statement Form	5 years
SYS/2/037/005	Process Flow for RCA	N/A
SYS/2/037/007	Aftermath of an Accident – Things to Remember	N/A



SYS/2/037/008	Generic Reporting Template	5 years
SYS/2/037/009	10 Day Process for Lost Time Incidents, Modified Duties and Significant Events	n/a
SYS/2/037/010	LTI Guidance Note	n/a