

Reporting and Investigating Work Related Incidents

1. Objectives

This procedure is intended to ensure:

- We learn from our mistakes and take action to continuously improve our performance when unplanned incidents occur.
- Suitable records are produced which detail the circumstances which led to the incident and the actions taken in response.
- Robust data capture procedures are in place to provide a consistent basis for the statistical analysis of performance and the identification of trends.
- We meet our legal obligations to notify injuries, diseases and dangerous occurrences to the relevant enforcing authorities.

[<Why is this Important?>](#)

2. Scope

This procedure applies to BT's Operations World-wide.

It details the requirements to be followed when the activities of BT or it's agents give rise to work related incidents.

Work related incidents are situations where, in the course of their work:

1. A person suffers an injury or ill health.
2. No physical harm occurred but the circumstances could have resulted in injury.
3. Psychological harm may be anticipated such as exposure to the threat of violence.
4. Significant financial loss or operational disruption has or could have occurred.

[<More Information>](#)

In the UK Union Safety Representatives will be entitled to carry out investigations in accordance with the arrangements set out in the Union Safety Representatives Agreement and as such are not covered by this procedure. However managers are encouraged to work with the USRs wherever possible and conduct joint investigations to further our partnership on health and safety with the CWU and Connect.

[<Link to USR Agreement>](#)

In countries outside the UK, recognised employee representative bodies will be afforded all reasonable assistance to investigate accidents which affect their members.

3. Roles & Responsibilities

Line Management in Lines of Business are responsible for ensuring that all accidents and incidents covered by this policy are reported. Where necessary, accident investigations will be conducted by BT Managers with support from the Safety Consultancy team and the Accident and Incident Reporting Group as required. Managers conducting the investigation may also request specialist support and assistance from other BT personnel as may be necessary. The majority of incidents will be dealt with by First Line Managers however there will be occasions where more senior managers need to be involved so that sufficient authority and commitment is available to identify and tackle issues raised by the investigation.

If the incident involves a non-BT employee, the line manager in control of the site where the incident occurred will be responsible for reporting the event to the AIRG and carrying out any necessary investigations. If the incident occurs in a public place the notification should be made by the line manager of the BT employees or the contract manager of the contractor working on behalf of BT in that area to the AIRG.

The <[Accident and Incident Reporting Group](#)> will maintain the company accident book, issue guidance on investigation of incidents in accordance with the criteria in this procedure, provide first line support in the investigation process, engage occupational health services to confirm cases of reportable disease, and make notifications to the Enforcing Authorities where necessary.

Some particularly significant work related incidents will be reported by the AIRG using the Red Flag Procedure. The categories of Incident and the reporting Arrangements are detailed <[here](#)>. This is designed to alert all parts of the Company who may be required to:

- provide support and assistance to the injured person and their family
- deal with press enquiries
- provide support to the line manager in conducting the investigation
- deal with any requests for assistance following enquiries by legal representatives or enforcement authorities

The Group HR Director has the discretionary authority to appoint a manager or technical specialist to lead the investigation into any Red Flag Incident. In such cases the Managing Director of the business unit where the incident occurred will be responsible for detailing action taken in response to the investigation report to BT's Management Council. Where an independent investigator is appointed the Work Programme Office at Accenture HR Services should be notified on 01785 763409.

[<More Information>](#)

4. Process

4.1.1 Reporting Incidents

Line Managers

Anyone involved in or witnessing an incident must report the circumstances to their Line Manager by the quickest possible means. The Line Manager must report all work related incidents as soon as possible to People Line on 0800 731 4747 (people outside of the UK should dial +44 1908 358888).

In every case an incident report should be made as soon as the circumstances allow and in any event no more than 24hrs after the event.

Line managers must also inform the AIRG if a reported incident subsequently results in more than 3 days sick absence. This notification should also be carried out if the employee person has been assigned to other duties because of an incapacity associated with their injury for more than 3 days.

[<more information>](#)

All instances where it is suggested that an employee is suffering from a medical condition caused by their work must be notified immediately to the AIRG. The Occupational Health Service will undertake investigation of these cases in conjunction with Line Management to confirm the circumstances. Reports of occupationally acquired disease will only be submitted to the Enforcing Authorities on confirmation by the Occupational Health Service.

Work related incidents involving BT People on customer's premises should be recorded in the customer's accident book (where available) and must also be reported to the AIRG by the relevant Line Manager.

If line management become aware that an injured party dies within one year as a result of injuries sustained in an incident at work, they must inform the AIRG.

In cases where an incident has been reported in error, the AIRG should be contacted to explain the circumstances and they will arrange to exclude the incident from statistical analysis.

If a line manager is not available due to leave or other commitments the Line of Business must ensure that appropriate alternative arrangements are in place to meet the requirements of this procedure. These arrangements must ensure that the notifications are made within the stated time scales and a suitable and sufficient assessment is conducted within the target times stated. Safety Consultants are available to support this process as required.

4.1.2 Injured Person

The injured person should contact People Line to record their account of events in the electronic accident book by calling People Line on 0800 731 4747 (people outside of the UK should dial +44 1908 358888). This is a Department of Work and Pensions requirement and the record may be necessary to validate any future claims for Incapacity Benefit.

4.2 Reporting of Injuries, Diseases and Dangerous Occurrences (UK Only)

In the UK there is a statutory requirement to notify injuries, diseases and dangerous occurrences to the Health and Safety Executive. These reports are submitted by the AIRG,

[<Reportable Injuries>](#)

[<Reportable Diseases>](#)

[<Reportable Dangerous Occurrences>](#)

4.3 Notification of Safety Representatives (UK Only)

All [significant work related incidents](#) must also be notified to the appropriate Employee Representative Body (CWU or Connect) and this is carried out by the AIRG using the information contained in the Safety Representatives Database.

5. Investigation of Significant Work Related Incidents

All [significant work related incidents](#) must be investigated by the line manager responsible for the injured person or the manager responsible for the area where the injury to a third party occurred. If the direct Line Manager is unavailable, suitable arrangements must be in place to allow another responsible person to carry out the investigation on their behalf. This should generally be another manager with appropriate knowledge and experience of the work involved. In cases of doubt the matter should be referred for advice to the Line of Business Safety Professional..

Guidance on investigation will be provided by AIRG with further support available from the Safety Consultancy Service via the Safety helpdesk. (0800 780783 within the UK or +44 1908 356320 from outside the UK) where necessary. In the case of ill health caused by work, the line manager will be directed to conduct an investigation by the AIRG after the case has been confirmed as work related by the Occupational Health Service.

Contractors must ensure that incidents to their own people working on behalf of BT are adequately investigated. This investigation should be carried out by the contracting organisation but BT management must carry out an investigation if the incident occurred in an area where BT people and agency personnel or contractors are co-located carrying out similar work (e.g. a call centre environment).

Where contractors are conducting their own investigations, the BT manager responsible for the contract must review the results and ensure that all appropriate actions have been taken to minimise the likelihood of a recurrence.

Reportable Incidents must be initially reported by the injured person or witness to their line manager who will notify the AIRG.

Where necessary the AIRG will provide the manager who reports the incident with an [investigation report pack](#). They must complete the investigation report and forward to the AIRG within seven working days of the incident. If there is some reason that the investigation will take longer than this the AIRG must be informed.

5.1 What do we need to investigate?

The main reason for investigation is to identify the reasons why the incident occurred and to learn how we can prevent a recurrence. There are some types of incidents which will offer little if any opportunity for learning and these simply need to be recorded. However others will potentially offer valuable insights into how we can improve our working practices and enhance our safety performance.

[<More information>](#)

The following incidents will be subject to full investigation by the line manager.

- Work related incidents which result in people being unable to carry out their normal work for more than 8 hours.
- Incidents which could have long term effects on the health and well being of the individual.
- All cases of ill health which are confirmed by the Occupational Health Service as being work related.
- All incidents where the injured person requires Hospital Treatment.
- All major injuries and dangerous occurrences which would require statutory notification to the UK enforcing authorities,
- Any incident where a member of the public is injured as a result of the activities of BT or its contractors.
- Any fire explosion or other incident on BT premises or at a workplace under the control of BT or its contractors which results in a disruption of work for more than 8 hours including incidents involving damage to underground services.

- Any incident where learning opportunities exist to improve BT's safety performance regardless of the injuries sustained or the losses incurred. This includes any incident which the potential to significantly impact on BT activities regardless of injury or damage

Any incident which is classified as a <[Red Flag Event](#)> will be subject to special reporting arrangements and may attract additional investigation requirements.

<[Further Information](#)>

This list will be periodically reviewed in the light of experience to ensure we continue to learn from our mistakes and improve our management of health and safety risks.

5.2 How do We Investigate Accidents?

5.2.1 Employee Assistance Management and the Role of Counselling

Whilst investigating the incident some people that you see may express reactions to you e.g. shock, flashbacks, depression, grief, guilt, distress etc. Whilst this may be perfectly normal in the circumstances if their reactions cause you any concern you are advised to contact the Duty Counselling Consultant on 0800 780784. The counselling consultant is a member of the Employee Assistance Management team and will assist in assessing the situation and the need for appropriate interventions

The consultant will maintain regular contact with the manager and offer a range of appropriate interventions, for the local management team, individuals and groups of colleagues. These may include any of the following:

- Ongoing assessment of the incident
- Ongoing contact and support for the management team
- Diffusion
- Debriefing
- 1 to 1 counselling

The level of intervention is usually determined by the nature of the incident. The Employee Assistance Management team consists of qualified counsellors who have the skills and expertise to manage any incident that may affect individuals adversely.

In addition to the management of the incident by the EAM team individuals who are affected can be encouraged to make direct contact with the employee assistance programme on 0800 9176767. This is a 24hr/365day confidential counselling service for all BT employees and both telephone and face to face counselling is available.

The following link will give you more details of the work of the Employee Assistance Management team and the Employee Assistance Programme. <http://btportal.hr.bt.com/ea/>

5.2.2 Reporting Sickness Absence

If sick absence has occurred as a result of this incident please ensure that you report the absence immediately by telephone on 0800 671345.

5.2.3 Accident Investigation

Investigation requires Managers and their people to undertake a critical and honest analysis of circumstances which allowed the incident to occur. It is vital that we maintain confidence in the process by ensuring that our people feel able to contribute openly to the process without fear of blame. For the vast majority of accidents the important thing is to ensure that we understand why incidents have occurred and what lessons the organisation can learn to prevent the problems occurring in the future. There may be legal considerations in some accidents but these will be in a minority and direction will be provided by Group Legal Services as part of the [red flag procedure](#) where appropriate.

You will receive guidance from the Accident and Incident Reporting Team when you report the accident and if necessary they will arrange to supply you with a copy of the [incident reporting pack](#) which you should complete and return within 7 days. This contains the report forms and guidance necessary to complete an investigation.

[<Further Information>](#)

If you require assistance to complete the investigation, support is available from the Safety Consultancy Service who can be contacted via the Safety Helpdesk.

In accident investigations it is important to involve the relevant Union Safety Representative in the process. Where Line Managers and Safety Representatives work together to identify causes of accidents and the remedial actions which are necessary it is often easier to convince the workforce of our commitment to safety and the need for any changes which are identified.

(This co-operation and co-ordination of activity does not affect the safety representatives legal right to independently investigate accidents as set out in the Safety Representatives Agreement should they deem this necessary to protect the interests of their Members.)

If the incident has been caused by a wilful disregard of safety procedure, it may be appropriate to consider disciplinary action if a full investigation of the circumstances has revealed that the individual knowingly disregarded BT defined safe systems of work and/or acted in a reckless way which could reasonably be expected to endanger themselves or others. Call 0800 780782 for advice.

In situations where individuals have been found to have shown a deliberate and wilful disregard for safety procedures, a further investigation should be conducted using procedures appropriate to gross misconduct and advice should be sought from Line HR. It must be made clear to the individual(s) concerned that this is the case as soon as possible in the process.

6. What do we Do with the Information?

When accident investigations have been completed it is important that the lessons and learning opportunities identified are effectively used. This is done by:

1. Effective statistical analysis to identify trends in the reported accident data. This helps us identify high performing parts of the organisation whose experience and knowledge can be used to benefit BT as a whole. It also shows the level of failures in the organisation which can be used to measure the effectiveness of our control strategies. It also gives us the potential to benchmark our performance against external organisations.
2. Analysis of the accident reports to identify ways in which our control strategies can be modified to avoid incidents in the future.
3. Effective transmission of the findings to the wider BT community using internal communication channels.

[<Frequently Asked Questions>](#)

1.1 Process Flow Chart

