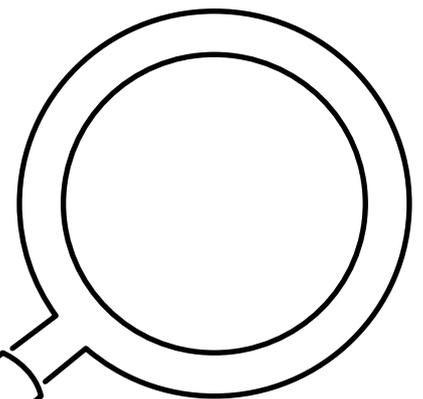




accidents don't have to happen

Driving for Work

Incident Reporting & Investigation



Produced with the support of
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Introduction



Driving is the most dangerous work activity that most people do. Over 100 people are killed or seriously injured every week in crashes involving someone who was driving or riding for work. This includes other road users, such as passengers, pedestrians and riders, as well as at-work drivers or riders themselves.

HSE 'Driving at Work' Guidelines state that "health and safety law applies to on-the-road work activities and the risks should be effectively managed within a health and safety system."

Therefore, employers must conduct suitable risk assessments and put in place all 'reasonably practicable' measures to ensure that work related journeys are safe, staff are fit and are competent to drive safely and the vehicles used are fit for purpose and in a safe condition. A key component of a risk management system is a comprehensive accident and incident reporting and investigation policy and procedure that is designed to:

- Ensure work-related road accidents, incidents and near misses are reported and recorded
- Identify their immediate and underlying causes
- Enable lessons to be learned and shared throughout the organisation
- Implement measures to reduce the likelihood of similar accidents or incidents occurring again

Ultimately, this will help to reduce the number of accidents and incidents, and their consequences.

Accidents are very costly in human and financial terms but, if investigated correctly, they also represent highly valuable safety learning opportunities. However, many factors can compromise good investigations, such as:

- Only concentrating on immediate causes and not underlying root causes
- A lack of understanding and skill by investigators
- Not using structured methods to integrate evidence
- A tendency to only seek to attribute blame
- Only seeking evidence that satisfies preconceptions and stopping the investigation too soon
- Failure to gather all the evidence (particularly poor interviewing techniques)
- Fear of recrimination and traumatised victims and witnesses inhibiting openness
- Not scaling investigations to the seriousness or learning potential of the accident or incident (investigating everything in the same way)
- Poor communication of lessons learned
- Failure to implement recommendations from the investigation

Therefore, organisations need to have a structured, methodical approach to accident, incident and near miss reporting and investigation, with the right policies, procedures and equipment in place to be ready and able to conduct thorough investigations, with staff who are appropriately trained to do so.

This guide gives simple advice on developing and implementing approaches to incident and accident reporting and investigation to enable organisations to learn appropriate lessons from their experiences.

The Ability to Investigate



Review Your Organisational Readiness to Investigate

Accidents happen suddenly and without warning, so managing their consequences and learning from them requires the ability to act quickly and efficiently so that learning opportunities are not missed. The worst time to discover whether your organisation is ready and able to investigate is in the immediate aftermath of an accident.

To review your organisation's readiness to investigate accidents, consider how well it coped with some of its previous accidents and incidents. If possible, run drills and rehearsals to test investigation response and capability.

Review Your Approach to Accident Investigation

Organisations need well thought out and rehearsed processes for responding to accidents, incidents and near misses effectively, especially in the early stages.

Each organisation needs to develop approaches to investigation that work best for it, bearing in mind that the essence of good investigation is to:

1. Gather evidence from physical sources, documentation and witness interviews
2. Integrate the evidence to create and test hypotheses (seeking more evidence where necessary)
3. Reach conclusions, make recommendations and communicate and implement any necessary improvements



Liaise with Your Insurer or Broker and Lease Company

Your insurer, broker and/or lease vehicle company should be able to provide advice on producing and implementing an accident investigation policy and procedure. They may also be able to advise how best to manage the data gathered about fleet use, accidents, incidents and near misses and how to use it to inform your risk management.

Accidents and incidents (and near misses if agreed) need to be reported promptly to the organisation's insurers and lease vehicle company. They will have procedures which drivers must follow for reporting accidents or incidents involving vehicles, and for arranging repairs or replacements.

Set a Clear Reporting and Investigation Policy

Set a clear, written policy that states:

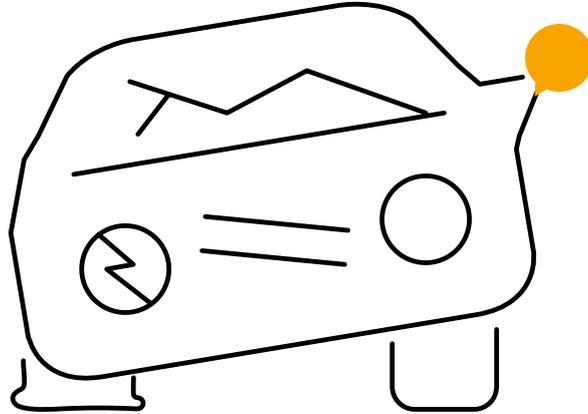
- All work-related road accidents, incidents and near misses (including damage-only ones and ones involving privately owned vehicles when they are used for work) must be reported to a line manager or other nominated manager
- All work-related road accidents, incidents and near misses (including damage-only ones and ones involving privately owned vehicles when they are used for work) will be investigated to establish how and why they occurred and to learn how to prevent them in the future. The organisation's accident reporting and investigation procedure will be implemented and must be followed by all staff and managers involved.

Define Terms

Define the terms “accident”, “incident” and “near miss” in the policy so that everyone in the organisation understands what they mean and when the policy and procedure applies. For example:

Accident

An event that resulted in personal injury to a staff member or another person, or resulted in property damage, categorised according to severity: ‘Fatal’ (at least one person killed), ‘Major’ (at least one person needs medical treatment, significant vehicle damage), ‘Serious’ (someone requires first aid, moderate vehicle damage) or ‘Minor’ (minor vehicle damage).



Incident

A dangerous occurrence that breached the organisation’s driving for work policy or safe driving practice (eg, the Highway Code). This could include a motoring offence, especially where a member of staff receives penalty points or a conviction, complaints about an individual’s driving, or data from in-vehicle telematics.

Near Miss

A dangerous occurrence that had the potential to result in personal injury to a staff member or another person, or to result in property damage.

Define Roles and Responsibilities

It’s important that all staff and managers understand their responsibilities to report, record and investigate accidents, incidents and near misses. For example:

Drivers and riders must report any work-related road accident, incident or near miss in which they are involved, or which they witness, according to the organisation’s reporting procedures. They must co-operate with the organisation’s reporting and investigation procedures and implement any identified corrective actions.

Line Managers must implement any immediate post accident, incident or near miss procedures, and record all work-related road accidents, incidents and near misses, according to the organisation’s reporting procedures. They must escalate the investigation to the appropriate senior manager or Department, according to the organisation’s procedures, co-operate with the organisation’s investigation, communicate any lessons learned from the investigation to their staff and implement any recommendations.

Nominated Senior Managers must implement any post accident, incident or near miss procedures to ensure that the appropriate level of investigation is conducted and recorded, according to the organisation’s procedures. They must ensure that the investigation’s conclusions and recommendations are shared throughout the organisation and all identified corrective actions are implemented and recorded.

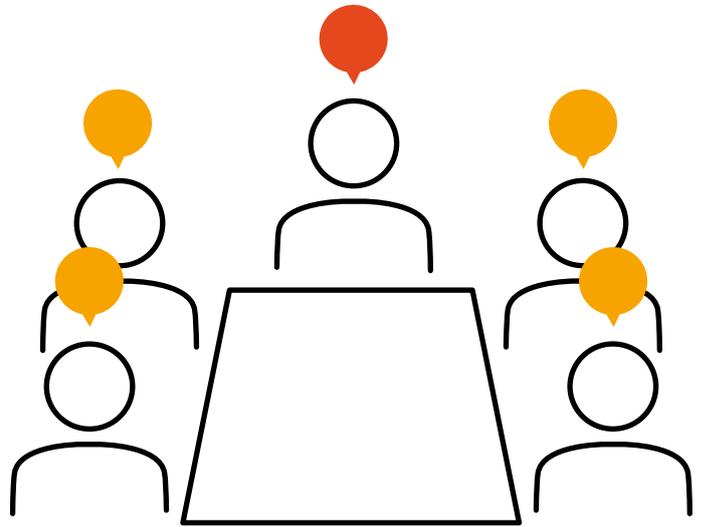
Directors must ensure that all staff and managers understand the organisation’s work-related road accident reporting and investigation policy and follow its procedures. They should ensure that work-related road accidents, incidents and near misses are recorded in a way that allows the company to analyse the data and use it to regularly review the organisation’s performance, and to set key performance indicators and targets.

Adopt a Manager-Led, Team-Based Approach

A team approach to investigation (led by a senior manager but involving other managers, HR, safety rep etc) will help to ensure the investigation is accurate and comprehensive, and that lessons learned are identified and implemented.

A nominated senior manager or director should be responsible for signing off the findings and recommendations of an investigation.

Team based investigations can also help to involve a wider range of people in the organisation's safety management and create champions for any resulting changes.



Be Clear About the Purpose of the Investigation

When investigating road crashes the focus must be on all relevant underlying factors, including the driver (fitness, training, etc), the vehicle (condition, maintenance), the journey and working practices, as well as on what happened in the last few seconds before the crash.

The purpose is not just to seek evidence of breaches of duty, or to seek evidence to defend claims. Therefore, it is important that the organisation's directors are in overall charge of the process and make it clear that the prime purpose is to fully understand why preventive arrangements did not work or were inadequate, so that lessons can be learned to prevent the incident happening again.

Produce a Clear Accident Reporting and Investigation Procedure

A clear, detailed accident reporting and investigation procedure that all staff and managers must follow is essential. In essence, investigation is about developing a full understanding of:

- What happened?
- When and where?
- How?
- Why?
- To whom and with what consequences?

The procedure should set out:

- When an accident, incident or near miss needs to be reported
- Who should report it, who to (internal and external) and how
- The timescales within which it must be reported
- The roles and responsibilities of the staff and managers involved
- How the procedure works with the organisation's HR policies, including its disciplinary policy.
- How the level of investigation is decided (safety significance, learning potential) and who decides
- The initial response to an accident or incident (including emergency action)
- The nature of the investigation and the resources that will be devoted to it
- The evidence (physical, witness interviews, documentation, etc) to be gathered and how
- How the evidence will be analysed and integrated (putting the facts together)
- The Departments and Managers who should be kept informed (eg HR)
- How the investigation, its conclusions and recommendations will be recorded
- Who will write the final report, and who will review and sign off the final report
- Who will implement the recommendations that result from the investigation, and how
- Who will ensure that the conclusions and recommendations are shared throughout the organisation so that lessons are learned, and how
- Who will check and review that the conclusions and recommendations have been implemented

Include Grey Fleet

The policy and procedures should apply to staff who drive their own personal vehicle for work.

Include Near Misses

Investigating near misses can bring most of the benefits of accident investigation without the consequences. To maximise 'near miss' reporting, introduce a 'no blame' reporting policy which makes it clear that the purpose is to learn from near miss experiences and not to penalise those involved.

Train Staff

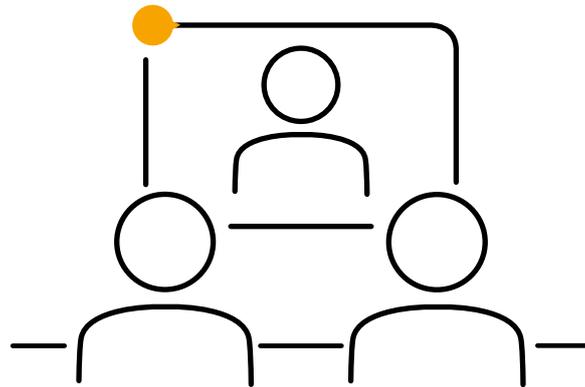
All drivers and riders should be trained in accident, incident or near miss reporting. They should know what they should report, who to, by when and how.

All managers responsible for recording accidents, incidents or near misses should be trained in the company's policy and procedures, especially on how to record and report, when and how to escalate, how to analyse data and trends.

Managers who are responsible for investigating accidents, incidents or near misses should be trained in accident and incident investigation. This should include:

- The organisation's accident reporting and investigation policy and procedures
- The organisation's health and safety, and driving for work, policies and procedures
- Gathering and recording evidence
- Interview techniques
- Root cause Analysis

Staff who are involved in visiting an on-road accident site should receive training for this purpose that includes the need to liaise with, and follow the instructions of, police officers at the scene, and managing the risks from traffic at the scene.



Engage Staff

Recruitment, induction, training, staff appraisals and regular internal communications to drivers, and their line managers should include the organisation's accident and incident reporting and investigation procedures. Lessons from the results of accident/near miss investigations should always be available as part of periodic performance review.

The Investigation policy and procedure should be consulted on with safety reps and clearly explained in driver training programmes, driver handbooks and other staff communications.

Provide a Driver's Accident/Incident Information Pack

It's essential that drivers know what they should do in the event of an accident. Provide an Accident/Incident Information Pack to be kept in the vehicle, which drivers should complete and return to their line manager. This should include:

- Taking immediate action (making the scene safe, helping any casualties, calling the emergency services if necessary and waiting at the scene until they have taken all the details)
- Reporting the collision to the Police within 24 hours if names are not exchanged
- Obtaining the names and addresses of witnesses at the scene.
- Notifying the line manager or other nominated person within the required timescale.
- Completing the organisation's accident/incident report form

Draw up a list of the information drivers should collect as soon as possible after the accident or incident, and provide a simple form to help drivers record the required information. This should include:

- Date, time, place
- Purpose of journey
- Starting time
- Environmental conditions (visibility, road surface condition etc)
- Exact location (with reference to a fixed point)
- Sketch or a photograph of the accident scene
- Position and direction of travel of vehicles and other parties
- A brief account of what happened using clear language
- Registration number, model and colour of other vehicle(s)
- Other driver's name and address and contact details
- Other party's insurance company details
- Damage to driver's and other vehicle(s) and/or property
- Injury to driver and/or passenger
- Injuries to other parties
- Names and addresses of any witnesses
- Any other relevant factors such as personal health, stress, fatigue etc

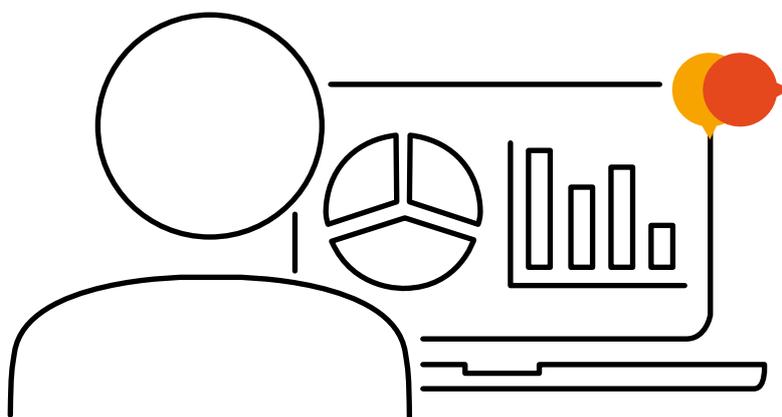
The information should be entered into the organisation's recording system for analysis.

Monitor and Analyse Data

Ensure that relevant data and information is recorded so that it can be monitored and analysed to identify and measure trends and key risks. Use the analysis to set key performance indicators and targets.

In addition, conduct regular audits to ensure the correct lessons are being learned and a true picture of incident profile is obtained.

Managers should monitor and evaluate their accident investigation policies and practices to ensure that they are working effectively. Advice on evaluation is available in "[How to Evaluate Managing Occupational Road Risk: A guide for employers](#)".



Benchmark Your Performance

The free Fleet Safety Benchmarking Tool at fleetsafetybenchmarking.net can be used to compare your organisation against others. Once completed, it automatically provides a personalised report with feedback on the results. Benchmarking is an effective way of improving work-related road safety, identifying good practices and generating cost saving opportunities. It also supports compliance with legal requirements and standards such as ISO39001.

The Investigation Process



Detailed advice is provided in the publications listed under “Further Advice”. A summary of the main aspects of the investigation process is below.

Adopt a Proportionate Approach

It is not possible, nor is it a good use of resources, to investigate every accident, incident or near miss in the same way. The level and depth of any particular investigation should be proportionate to the seriousness of the event (injury severity, etc) but also to the learning opportunities it presents.

However, try not to relegate all near misses or damage-injury events to just a cursory recording process. Periodically select some for in-depth team based investigation. This will allow lessons to be learned before people are hurt and in circumstances (no prospect of claims, prosecutions or disciplinary action) that usually make investigation and witness interviewing much easier.

Initial Response

For work-related road accidents, especially if someone has been injured, the organisation will need to liaise with the police. Arrangements need to be agreed to ensure cooperation, effectiveness of both sets of investigations and to optimise resources (e.g. sharing non-confidential evidence such as photographs).

An early review of the event is necessary to capture the circumstances and to decide on the remit and the resources required for the main investigation.

If the initial investigation suggests there is an urgent safety problem or failure that may have implications elsewhere, others need to be made aware and provided with accurate information. Enforcers such as the HSE or trade associations, for example, may need to post alerts for other businesses.

For other lower level events the organisation should ensure that the appropriate lead investigator and support team is selected.

Gather Evidence

Good evidence gathering, preservation and recording are the foundations of good investigation. This should begin as soon as possible and be systematically recorded. The process needs to be well structured, setting out how the evidence was obtained, what is known and what is not known.

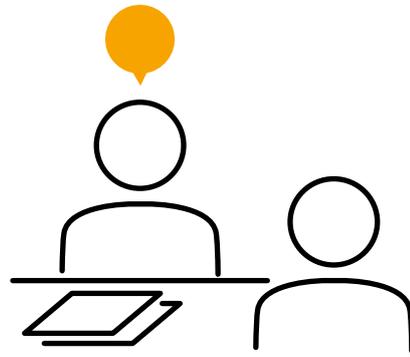
Establish protocols for gathering, disseminating and securely storing evidence, including:

- Photographs and film images
- Diagrams and sketches
- Witness statements
- Personal injury details
- Documents (eg, risk assessments; permit-to-drive, driving licence checks, vehicle maintenance and service records, journey schedules, hours worked, driver training and re-training records, refresher training, e-learning, briefings, minutes of meetings)
- Relevant communications, such as voicemail messages and emails
- Records of relevant precursor events, such as near misses
- Observations from routine inspection reports or findings noted in periodic monitoring and/or audit reports

Witnesses

Witnesses should be identified and interviewed as soon as possible after the event, with accurate records kept. They should be informed how their statement may be used in any HR or disciplinary process.

Investigators should be trained in witness interview techniques, and to anticipate difficult situations and interviewees who may be unwilling to talk or distressed.



Telematics

Telematics can be very helpful in accident and incident investigations because the data provides an accurate and objective picture of what happened. This often means that investigations are quicker, easier and less expensive to conduct, and the conclusions are more accurate and reliable. It can also help to ensure that accidents and incidents are recorded, with less reliance on staff and witness reports.

Adopt a Structured Approach

Bring the evidence together in a systematic and structured way, including creating a basic timeline, to help the team answer, with reasonable certainty, what happened, where, when, to whom and how, with what results and why. There are a number of different approaches to structuring underlying causes, each with its own training requirements, including:

- STEP (Sequentially Timed Events Plotting)
- AcciMap
- Fish-bone diagrams
- Fault tree analysis
- SCAT (Systematic Cause Analysis Technique)
- MTO Analysis Accident investigation
- ECFA (Events and Conditional Factors Analysis)

Any work-related road accident, incident or near miss will have multiple causes, which can be divided into ‘immediate’ and ‘underlying’ causes. To consider all the ‘causes’ leading up to an accident, work backwards from the moment of the accident through the history of the potential causes that eventually led to it. It is useful to keep asking ‘why’ in order to identify underlying causes as there may be contributory factors relating to the individual, their vehicle, job and/or the organisation which helped to create unsafe working conditions.

The important thing is to find out not just what happened in the last few seconds or minutes before the crash or incident, but what was happening (or not happening) in the hours, days, weeks or months beforehand. For example, the immediate cause of a collision may be a driver exceeding the speed limit. The underlying causes may include a poor driving schedule that didn’t allow sufficient time for the journey, pressure to meet deadlines, the driver’s attitude to speeding, a high-powered sporty car, insufficient driver training and so on.

Developing a fuller understanding of human error (slips, lapses, mistakes, violations and combinations of these) is essential to help investigators understand the range of underlying causes that can contribute to unsafe acts and unsafe conditions. This will enable investigators to develop more robust recommendations for managing and mitigating the likelihood of accidents occurring in the future. Addressing underlying causes that are further back in the organisation’s processes, such as a lack of proper journey planning, is likely to have the biggest impact on preventing future accidents. The focus should be on the journey, the vehicle and the organisation’s policy and procedures, as well as on the driver.

Produce Recommendations

The investigation should establish whether driver behaviour, the driving task, the vehicle, the environment and/or the organisation's working practices and culture contributed to the crash, and what (if any) action could be taken to prevent repeat occurrences.

It is likely that there will be a number of causes of a work-related road crash, so the recommendations will need to address each of these. They can be prioritised according to the ERICA hierarchy of Eliminate, Reduce, Isolate, Control and Adapt. It's important to be clear about who is expected to take action, and how, to implement the recommendations.

Recommendations should be proportionate, and may need to be supported by a cost benefit analysis.

Recommended actions should be risk assessed to ensure that they do not create any new, unintended consequences.

Produce the Investigation Report

The purpose of the investigation report is to report accurately on the accident and its causes and to make recommendations to improve safety. The report should be clear, easy to read, factual and address the remit of the investigation.

A suggested report structure is:

1. Executive summary, including the date, time and location of the event, a brief description of it; the investigation's finding and recommendations
2. Introduction, terms of reference, methods, etc,
3. Evidence, e.g. photographs, documents and interviews
4. Summary of events, e.g. timeline
5. Factors for consideration (human, vehicle, journey, environmental and management)
6. Conclusions, including immediate and underlying causes
7. Recommendations and actions
8. Appendices (eg Diagrams, plans, maps and photographs)



Be aware of the need to protect the personal information of the people and witnesses involved, especially if the report may be seen by anyone outside the organisation.

Implement the Recommendations

All agreed recommendations must be recorded, implemented and monitored to ensure that they are achieving their purpose.

Share the Lessons Learned

The findings of an investigation and the recommendations for action to prevent it happening again should be shared with all staff, for example, through internal communications such as the staff intranet, notice-boards, house magazines etc. Sharing with other businesses can also be useful.

Further Advice



Driving at Work (HSE Guide INDG 382)

Investigating accidents and incidents (HSE Guide SG 245)

Human factors in accident investigations (HSE Website)

Investigating accidents and incidents (HSE Website)

Work Related Road Safety (HSE Website)

Root causes analysis: Literature review (HSE Guide)

Learning How to Learn From Accidents (RoSPA Guide)

Learning from Safety Failure (RoSPA Website)

Defining Operational Readiness to Investigate (Noordwijk Risk Initiative Foundation and RoSPA)

RSSB Investigation Guidance: PART 3 Practical support for accident investigators (RSSB Guide)

Fleet Safety Benchmarking Tool

Events and Conditional Factors Analysis - ECFA+ (Noordwijk Risk Initiative Foundation)

Occupational Road Safety Alliance (ORSA)

RoSPA Driving for Work Guides

RoSPA Vehicle Safety

Scottish Occupational Road Safety Alliance (SCORSA)

Highway Code

Department for Transport (DfT)

Company Incident Reporting and Investigation Policy



As part of our overall health and safety policy, we are committed to reducing the risks which our staff face and create when on the road as part of their work. We ask all our staff to play their part. When driving for work, staff must always drive within road traffic laws, safely and responsibly.

All work-related road accidents, incidents and near misses (including damage-only ones and ones involving privately owned vehicles when they are used for work) must be reported to a line manager or other nominated manager

We will investigate all work-related road accidents, incidents and near misses (including damage-only ones and ones involving privately owned vehicles when they are used for work) to establish how and why they occurred and to learn how to prevent them in the future. The results of an investigation may include changes to our driving for work policy and procedures and/or disciplinary measures, if appropriate.

Failure to comply with our incident reporting and investigation policy and procedures will be regarded as a disciplinary matter, in accordance with our HR and disciplinary policies. Persistent failure to comply with the policy and procedure, or a single serious instance, will be regarded as a serious disciplinary matter.

Senior managers must ensure:

- Lead by example
- They understand and follow the organisation's accident reporting and investigation policy and procedures
- Their staff and managers understand and follow the organisation's accident reporting and investigation policy and procedures

Line managers must ensure:

- They also lead by personal example
- They understand and follow the organisation's accident reporting and investigation policy and procedures
- Their staff understand and follow the organisation's accident reporting and investigation policy and procedures
- The findings and lessons from investigations are included in team meetings and staff appraisals
- They follow the monitoring, reporting and investigation procedures to help learn lessons which could help improve our future road safety performance

Staff who drive for work must ensure:

- They understand and follow the organisation's accident reporting and investigation policy and procedures
- They report crashes, incidents, fixed penalties, summons and convictions for any offence, including vehicle defects, to their line manager
- Co-operate with our monitoring, reporting and investigation procedures.



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