



**Plastica Ltd**

## **Accidents and Incidents**

*(ISO 45001:2018, Clause 10.2)*

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**HS&E 44**

## **1.0 Introduction**

Plastica Ltd ensures that all safety measures and risks that affect the workplace are fully understood and that the workforce are fully aware of Health & Safety legislative requirements and compliance to reduce accidents, incidents, ill health and hazards at all times.

## **2.0 Scope**

Plastica Ltd has established and maintained procedures for defining responsibility and authority for the:

- Handling and investigation of accidents; incidents; ill health and non-conformances;
- Taking action to mitigate any consequences arising from accidents, incidents or non-conformances;
- The initiation and completion of corrective and protective actions;
- Confirmation of the effectiveness of corrective and preventive actions taken.

These procedures require that all proposed corrective and preventive actions will be reviewed through the risk assessment process prior to implementation.

Any corrective or preventive action taken to eliminate the causes of actual and potential non-conformances shall be appropriate to the magnitude of problems and commensurate with the OHSE (Occupational Health, Safety and Environmental) risk encountered.

The organisation implements and records any changes in the documented procedures resulting from corrective and preventive action.

## **3.0 Process**

Plastica Ltd has prepared documented procedures to ensure that accidents, incidents and non-conformances are investigated, and corrective and/or preventive actions initiated. Progress in the completion of corrective and preventive actions should be monitored and the effectiveness of such actions reviewed.

## **4.0 Procedures**

The procedures should include consideration of the following items:

- Define the responsibilities and authority of the persons involved in implementing, reporting, investigating, follow-up and monitoring of corrective and preventive actions;
- Require that all non-conformances, accidents, incidents, ill health and hazards be reported;
- Apply to all personnel (i.e., employees, temporary workers, contractor personnel, visitors and any other person in the workplace. Also take into account any other person who may be affected by the organisations operations);
- Take into account property damage;
- Ensure that no employee suffers any hardship as a result of reporting a non-conformance, accident, ill health or incident;
- Clearly define the course of action to be taken following non-conformances identified in the OHSE management system.

### **4.1 Immediate action**

Immediate action to be taken upon observation of non-conformances, accidents, incidents, ill health or hazards should be known to all parties. The procedures should:

- Define the process for notification;
- Where appropriate, include co-ordination with emergency plans and procedures;
- Define the scale of investigative effort in relation to the potential or actual harm (e.g. include management in the investigation for serious accidents).

#### 4.2 Recording

Appropriate means should be used to record the factual information and the results of the immediate investigation and the subsequent detailed investigation. The organisation should ensure that the procedures are followed for:

- Recording the details of the non-conformance, accident or hazard;
- Defining where the records are to be stored and responsibility for the storage.

#### 4.3 Investigation

The procedures define how the investigation process should be handled. The procedures should identify:

- The type of events to be investigated (e.g. incidents that could have led to serious harm);
- The purpose of investigations;
- Who is to investigate, the authority of the investigators, required qualifications (including line management when appropriate);
- The root cause of non-conformance;
- Arrangements for witness interviews;
- Practical issues such as availability of cameras and storage of evidence;
- Investigation reporting arrangements including statutory reporting requirements;

Investigatory personnel should begin their preliminary analysis of the facts while further information is collected. Data collection and analysis should continue until an adequate and sufficiently comprehensive explanation is obtained.

#### 4.4 Follow-up

Corrective or preventive action is taken as permanently and effectively as practicable. Checks should be made on the effectiveness of corrective/preventive action taken.

Outstanding/overdue actions should be reported to top management at the earliest opportunity.

#### 4.5 Non-conformance, accident and incident analysis

Identified causes of non-conformances, accidents, ill health and incidents should be classified and analysed on a regular basis. Accident frequency and severity ratings should be calculated in accordance with accepted industrial practice for comparison purposes. Classification and analysis should be carried out of the following items:

- Reportable or lost-time injury/illness frequency or severity rates;
- Cases of ill health or reportable diseases;
- Location, injury type, body part, activity involved, agency involved, day, time of day (whichever is appropriate);
- Type and amount of property damage;
- Direct and root causes;

- Due attention should be given to accidents involving property damage. Records relating to repair of property could be an indicator of damage caused by an unreported accident/incident;
- Accident and ill health data/information is vital as they can be a direct indicator of OHSE performance. However, caution in their use should be exercised, as the following points need to be considered:
- Most organisations have too few injury accidents or cases of work-related illness to distinguish real trends from random effects;
- If more work is done by the same number of people in the same time, increased workload alone can account for an increase in accident rates;
- The length of absence from work attributed through injury or work-related illness can be influenced by factors other than the severity of injury or occupational illness;
- Accidents are often under-reported (and occasionally over-reported), levels of reporting can change and they can improve as a result of increased workforce awareness and better reporting and recording systems;

A time delay will occur between OHSE management system failures and harmful effects. Moreover, many occupational diseases have long latent periods. It is not desirable to wait for harm to occur before judging whether OHSE management systems are working.

Valid conclusions are drawn, and corrective action taken. At least annually, this analysis is circulated to top management and included in the management review (see HS&E 37).

#### 4.6 Monitoring and communicating results

The effectiveness of OHSE investigations and reporting are assessed. The assessment will be objective and will yield a quantitative result if possible. The organisation, having studied the investigation, will:

- Identify the root causes of deficiencies in the OHSE management system and general management of the organisation where applicable;
- Communicate findings and recommendations to management, employees and relevant interested parties;
- Include relevant findings and recommendations from investigations;
- Monitor the timely implementation of remedial controls and their subsequent effectiveness over time;
- Apply the lessons learned from the investigation of non-conformances across its whole organisation, focussing on the broad principles involved rather than being restricted to specific action designed to avoid repetition of a precisely similar event in the same area of the organisation.

#### 4.7 Record keeping

The associated documentation should be appropriate to the level of corrective action.

Reports and suggestions should be sent to the management appointee and where appropriate, the employee OHSE representative, for analysis and filing.

The organisation maintains a register of all accidents. Incidents that have the potential for significant OHSE consequences should also be included. Such a register is often required by legislation.

#### 4.8 Typical outputs

- Accident and non-conformance procedure;
- Non-conformance results;

- Non-conformance register;
- Investigation reports;
- Updated hazard identification, risk assessment and risk control reports;
- Management review input;
- Evidence of evaluations of the effectiveness of corrective and preventive actions taken;
- Accident Book.

## 4.9 Corrective and preventative action

### 4.9.1 Introduction and scope

The OHSE requires that non-conformances against the Health, Safety and Environmental policies and procedures detailed in this manual are identified, evaluated and registered and that appropriate corrective and preventive actions are taken. These actions should be recorded and monitored by identified personnel.

### 4.9.2 Responsibilities

The Managing Director (MD HSFE), Business Development Director (BDD HSFE) and IT Director (ITD HSFE) with overall responsibility for Health, Safety, Environmental and Fire has the overall responsibility for the implementation of this procedure.

### 4.9.3 Procedure

The Managing Director (MD HSFE), Business Development Director (BDD HSFE) and IT Director (ITD HSFE) with overall responsibilities for Health, Safety, Environmental and Fire is responsible for identifying and investigating non-conformances. Whilst there is a clear difference between corrective and preventive actions, both can conveniently be processed through the same procedure after the initial identification stage. Corrective actions may be raised against:

- Departure from the Health & Safety policies and procedures;
- Departure from instructions;
- Non-compliance against legal, regulatory or other requirements;
- Health & Safety performance falling below targets;
- Incidents, ill health and accidents that impact on safety;
- Potential Health & Safety impacts;
- Complaints from an interested party;
- Non-conforming delivery of service from a supplier or sub-contractor;
- Non-conformance from a sub-contractor working on site;
- Any other operation, activity, product or service that does not meet the Health & Safety requirements of ISO 45001:2018.

The non-conformance is noted on the appropriate form. Follow-up is controlled through the Management Review meeting. Records are kept.

## 5.0 Related Documentation

HSEF 117 – Communications Register  
HSEF 120 – Non-Conformance Report Form  
HSEF 20 – Accident Report – Damage to Property Only  
HSEF 21 – Accident Report – Injury to Person and Damage to Property  
HSEF 22 – Accident Report – Injury to Person Only  
HRF 15 and 16 – Management Review Agenda and Minutes