



# Accident and Incident Reporting Procedure

<b>Policy Number</b>	<b>HS002</b>
<b>Target Audience</b>	<b>CCG staff</b>
<b>Approving Committee</b>	<b>Health &amp; Safety Committee</b>
<b>Date Approved</b>	<b>Oct 2015</b>
<b>Last Review Date</b>	<b>New policy</b>
<b>Next Review Date</b>	<b>Oct 2017</b>
<b>Policy Author</b>	<b>CCG Risk &amp; Complaints Manager</b>
<b>Version Number</b>	<b>V1.3</b>

The CCG is committed to an environment that promotes equality, embraces diversity and respects human rights both within our workforce and in service delivery. This document should be implemented with due regard to this commitment.

This document can only be considered valid when viewed via the CCG's intranet. If this document is printed into hard copy or saved to another location, you must check that the version number on your copy matches that of the one online.

Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until a new version is available.

## Version Control Sheet

Version	Date	Reviewed By	Comment
1	June 2015	D Sankey	Submitted to Staff Forum July 2015 for distribution to teams requesting staff comments
1.2	Sept 2015	Staff Forum members	Amended following feedback from Staff Forum consultation
1.3	22 Oct 2015	Health & Safety Committee	To review and approve final draft

Analysis of Effect completed:	By: D Sankey	Date: June 2015
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Contents	Page
1. Introduction	4
2. Definitions	4
3. Other Relevant Documents	5
4. Roles and Responsibilities	5
5. Procedure for reporting Accident & Incidents	6
6. Incident reviews and notification process	7
7. Lessons learned and incident closure	7
8. Reporting of themes and trends	7
9. Monitoring and Review	8
10. Analysis of Effect	9
<b><u>Appendix A</u></b>	
<b>CCG Accident &amp; Incident Reporting Process</b>	<b>10</b>

## 1 Introduction

Bolton Clinical Commissioning Group (CCG) is committed to a programme of effective risk and incident management. This procedure outlines the process in place for the recording, reporting and reviewing of incidents that occur within the CCG.

This procedure applies to all staff who work for or on behalf of the CCG e.g. CSU staff and to third party contractors and others (e.g. business partners, including other public sector bodies, volunteers, commercial service providers) who may use the CCG services.

## 2 Definition of an accident or incident

An incident can be defined as any issue that arises or an actual event that occurs that may put a person or the organisation at risk. Some examples are given below:

- Accidental injury sustained by a person
- Near miss or potential injury to individuals
- Loss or theft of personal belongings or CCG equipment
- Personal safety issues
- Breach of personal or confidential data (patient/staff/corporate information)
- Failure to adhere to protocol and procedures
- Breach of security
- Clinical or patient safety incidents
- Fraud or suspected fraud
- Threatening, inappropriate or violent behaviour
- Safeguarding issues identified by CCG staff

Further information on what should be reported as an incident can be obtained from Diane Sankey, Risk & Complaints Manager [dianesankey@nhs.net](mailto:dianesankey@nhs.net) Tel 462023.

### 2.1 Serious Incident Framework

NHS England's Serious Incident Framework March 2015 was developed from previous guidance of the National Patient Safety Agency (NPSA) relating to serious incidents in NHS-funded care. Further information can be found here: [www.england.nhs.uk/ourwork/patientsafety/serious-incident/](http://www.england.nhs.uk/ourwork/patientsafety/serious-incident/)

The CCG Operational Policy for the Performance Management of Serious Incidents (QS003) [www.boltonccg.nhs.uk/about-the-ccg/what-we-do/plans-policies-and-reports](http://www.boltonccg.nhs.uk/about-the-ccg/what-we-do/plans-policies-and-reports). The definition of serious incidents that need to be reported to NHS England can be found on Page 7 of the above policy. Any incident reported to the CCG that meets the criteria for external reporting, will be reported to NHSE by the CCG Integrated Governance and Policy Team. Further information can be obtained from

Sue Mackie, Lead Nurse, Quality & Safety [s.mackie1@nhs.net](mailto:s.mackie1@nhs.net)  
Diane Sankey, Risk & Complaints Manager [dianesankey@nhs.net](mailto:dianesankey@nhs.net)

## 2.2 Information Governance incidents

Staff should refer to the CCG's Information Governance Incident Reporting Procedure IG007 for incidents relating to potential or actual events involving patient or personal data.

[www.boltonccg.nhs.uk/your-services/document-store/cat\\_view/60-information-governance](http://www.boltonccg.nhs.uk/your-services/document-store/cat_view/60-information-governance).

The CCG will use the Health and Social Care Information Centre (HSCIC) checklist and guidance to assess IG related incidents regardless of the severity level. IG officers responsible for reporting to HSCIC via the IG Toolkit are:

Ruth Quinn, Senior Information Governance & Audit Officer [ruthquinn@nhs.net](mailto:ruthquinn@nhs.net)  
Camilla Bhondoo, Senior Information Governance Officer [camilla.bhondoo@nhs.net](mailto:camilla.bhondoo@nhs.net)

Any serious information governance breaches attributable to the CCG will be referred to in the organisation's Annual Governance Statement.

## 3 Other Relevant Documents

RM001	Risk Management Strategy
QS003	Operational Policy for the Performance Management of Serious Incidents
QS002	Compliments, Complaints and PALS Policy & Procedure (inc Vexatious Complainants Guidance)
QS004	Claims Handling Policy & Procedure
IG002	Confidentiality and Data Protection Policy
IG003	Corporate Information Security Policy
IG005	Records Management Policy
IG007	Information Governance Incident Reporting Procedure
WB001	Whistle Blowing Policy & Procedure
RM003	Zero Tolerance Policy (in development)

## 4 Roles and Responsibilities

### 4.1 Chief Officer

The Chief Officer has ultimate responsibility for the implementation of the provisions of this procedure. As the 'Accountable Officer' they are responsible for the management of the organisation and for ensuring that the appropriate mechanisms are in place to support service delivery and continuity.

### 4.2 Risk & Complaints Manager

Overall responsibility for the Accident & Incident Reporting Procedure lies with the CCG's Risk and Complaints Manager who will ensure that:

- A database is maintained to record and monitor accidents and incidents reported by Bolton CCG staff, third party contractors and visitors to CCG premises.
- Training and guidance relating to the reporting of incidents is provided to CCG staff.
- Managers/Associate Directors review accidents/incidents that occur within their team(s) and that learning points are fully considered.
- Liaison takes place with NHS Property Services in relation to any estate or building related incidents that occur.
- Learning from incidents and prevention of accidents is appropriately disseminated to staff and managers.
- Serious accidents and injuries are reported as appropriate to:
  - NHS Litigation Authority
  - Health & Safety Executive (RIDDOR report)
- Accident/incident themes and learning outcomes are reported to:
  - CCG Health & Safety Committee
  - CCG Executive Committee

#### 4.3 Associate Directors and Department Managers

Associate Directors and Department Managers will be responsible for ensuring that accidents and incidents that occur within their teams are reported in accordance with the process outlined at Appendix A.

Associate Directors and/or Department Managers will also be responsible for:

- reviewing what caused the accident/incident
- interviewing relevant staff where appropriate
- determining any learning points to prevent/reduce recurrence
- liaising with other managers as appropriate (e.g. Chief Officer, Board Secretary, Risk & Complaints Manager for health safety advice, estate problems)
- Providing feedback to people involved in an accident/incident
- Liaise with Risk & Complaints Manager to disseminate wider learning across the organisation

#### 4.4 CCG employees

All individuals are responsible for adhering to this policy and ensuring accidents and incidents are reported in accordance with the process outlined at Appendix A.

Staff may receive advice and support from a number of sources:

- Risk & Complaints Manager
- Line manager/Associate Director
- Specific training on incident reporting
- Customer Services Officer
- Integrated Governance support staff

- other communication methods (e.g. team brief/team meetings); staff Intranet;

## 5 Procedure for reporting Accidents and Incidents

Accidents and incidents electronically via the reporting tool on the Bolton CCG intranet. The link can be found under “Support” Tab and can be accessed direct <http://sq01/safeguard/index.aspx?sid=%20>.

Individuals need to be signed into the CCG intranet and not using the public website.

The procedure for electronically reporting incidents is attached at **Appendix A**.

Where staff have no access to the intranet, details should be emailed to [bolccg.incidents@nhs.net](mailto:bolccg.incidents@nhs.net) or contact the Integrated Governance Team on Tel 462213.

## 6 Incident review and notification process

Once a report is submitted, an incident number is generated and the Risk & Complaints Manager notified. The Integrated Governance Department will acknowledge receipt of the incident to the reporter and will notify the relevant line manager and other senior leads for review.

Notification examples:

- a breach of patient identifiable data (PID) would be notified to:
  - The person’s line manager
  - Information Governance leads and Risk/Complaints Manager
  - CCG Caldicott Guardian
  - SIRO (depending on the severity of the of data loss or breach)
- an incident relating to nursing or funded nursing care is notified to:
  - CCG Chief Nurse
  - CHC Manager
  - Lead Nurse for Quality & Safety
  - Safeguarding Adult or Children’s Lead (where appropriate)

The immediate response to an accident/incident and the escalation process for investigation or external reporting will vary according to the severity level of the incident.

## 7 Lessons learned from accidents/incidents and closure

Once a manager has investigated the cause of an accident/incident the Integrated Governance & Policy Team will ensure that:

- The incident report is reviewed by an appropriate manager or group
- Lessons learnt to prevent recurrence are appropriately disseminated via

- Individual feedback and discussion at team meetings
- Staff Forum
- Staff Briefing – led by Chief Officer/CFO
- Weekly Staff Focus

## **8 Reporting of themes and trends**

### **8.1 Routine Reporting**

Analysis of incidents, key issues, themes and learning points will be shared with senior managers, CCG directors and reports submitted to the following sub-committees and groups.

- Health & Safety Committee
- Staff Forum
- Quality & Safety Committee
- Information Governance Steering Group
- IM&T Operational Board

And to any other sub-committee or group as required by the CCG Chief Officer.

### **8.2 Reporting within the CCG's Annual Governance Statement**

Any serious incidents reported against the CCG that requires reporting via NHS England's Serious Incident Framework and any Information Governance Serious Incident Requiring Investigation (SIRIs) with a severity rating of Level 2 as defined by the HSCIC IG reporting toolkit will be reported in the CCG's Annual Governance Statement.

### **8.3 Annual Customer Services Report and Risk Management Report**

Annual analysis of incidents, themes and trends and learning will be included in annual reports submitted to

- Quality & Safety Committee
- Governance & Risk Committee

## **9 Monitoring and review**

This procedure will be reviewed every two years or when required due to:

- legislative changes; good practice guidance; case law;
- significant incidents reported; new vulnerabilities; or
- changes to organisational infrastructure.



## Analysis of Effect (AoE) Tool

To be completed and to accompany any procedural document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	<b>Does the document/guidance affect one group less or more favourably than another on the basis of:</b>		
	• Age	No	
	• Disability - learning disabilities, physical disability, sensory impairment and mental health problems	Yes	Integrated Governance & Policy Team would log incidents on employees behalf or offer alternative support.
	• Gender Reassignment	No	
	• Marriage and civil partnership	No	
	• Pregnancy and maternity	No	
	• Race (including gypsies and travellers)	No	
	• Religion or belief	No	
	• Sex	No	
	• Sexual orientation	No	
2.	<b>Is there any evidence that some groups are affected differently?</b>	No	
3.	<b>If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?</b>	No	
4.	<b>Is the impact of the document/guidance likely to be negative?</b>	No	
5.	<b>If so, can the impact be avoided?</b>	-	
6.	<b>What alternative is there to achieving the document/guidance without the impact?</b>	-	
7.	<b>Can we reduce the impact by taking different action?</b>	No	

If you have identified a potential discriminatory impact of this procedural document, please refer it to Mike Robinson, together with any suggestions as to the action required to avoid/reduce this impact.

For advice in respect of answering the above questions, please contact Mike Robinson [michael.robinson1@nhs.net](mailto:michael.robinson1@nhs.net) 01204 462398

## Bolton CCG Accident & Incident Reporting Procedure Appendix A

You should report incidents via the incident reporting tool on the intranet. The link can be found under “Support” Tab and can be accessed here:

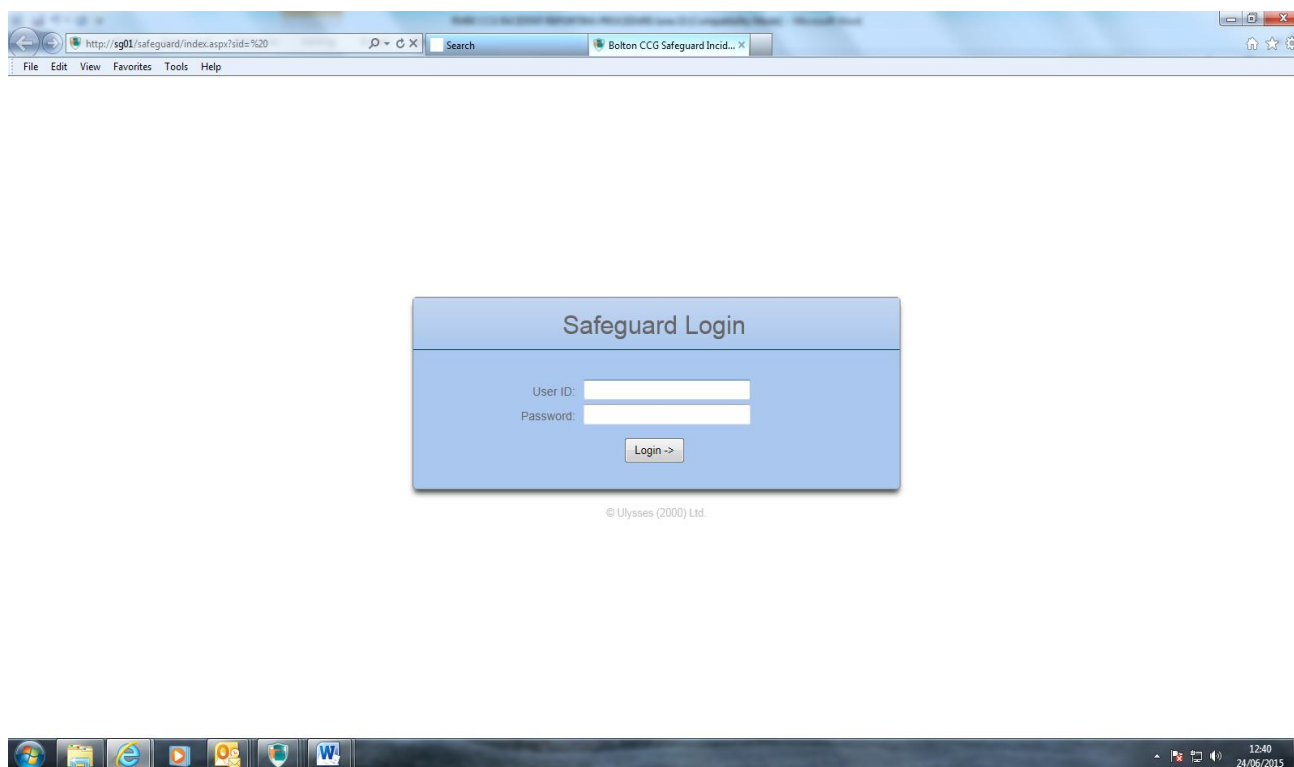
<http://sg01/safeguard/index.aspx?sid=%20>.

Remember – you need to be signed into the CCG intranet and not using the public website.

If you have no access to the intranet, details should be reported to [bolccg.incidents@nhs.net](mailto:bolccg.incidents@nhs.net) or to the Integrated Governance & Policy Team, St Peters House on Tel 462213.

Complete all the yellow fields which are mandatory.

### 1. Log in



You should log in with the same user ID and password you use to access the CCG IM&T network.

## 2. Insert or update your details

Please note you only have about 15 minutes to complete this form. If you need more time clicking save for later at the end of the form this saves a copy, which can be found by clicking on Manage Incidents when you log back on. Please when completing the form enter as much detail as you can. Any boxes that are shaded yellow are mandatory and must be completed. If you are unable to find the item you want from any of the drop down boxes please pick something else submit the form then email BolCCG.incidents@nhs.net Providing the number of the submitted incident. What list you looked at. What item you wanted and what you choose so you could submit the form.

**Details of Person completing this form**  
 If blank please complete ⌵

Clear Details

Surname	
First Name	
Job Title	▼
Job Status	▼
Organisation	▼
Site	▼
Department	▼
Directorate	▼
Contact No.	
Ethnicity	▼
Email Address	
Contact Details	

## 3. Enter data about where the accident/incident occurred, if a person was affected and grade the severity of the event.

If you or another person was affected, another box will appear for you to add their name and any other relevant identifiable information.

**Incident Information** ⌵

**Where did the incident take place?**

Organisation in which the incident occurred	▼
Site of the Incident	▼
Your Department	▼
Specialty	▼
Exact location	▼

Where found / dept. investigating (if different)?

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**Names of the people involved in the Incident here please**  
 Please click on all tabs Details/Injury etc and enter the relevant information ⌵

**Person Details 1**  
 You must choose one of these  Patient  Staff  Visitor(Other non staff)  Non-Person Incident ?

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**Member of Staff's view of the severity of this incident**  
 Decide what you think the Likelihood and Consequence are and enter on the matrix ⌵

Consequence	Likelihood				
	Rare	Unlikely	Possible	Likely	Almost Certain
Catastrophic	●	●	●	●	●
Major	●	●	●	●	●
Moderate	●	●	●	●	●
Minor	●	●	●	●	●
Negligible	●	●	●	●	●
Outcome:					

- 4. Enter accident/ incident date, details of what happened and immediate action taken as a result of the incident

What happened and when? No names in this section please  
put the names of the people involved in the incident in the Subject Details Section

Incident Date

Incident Time (24 hr clock)  (hhmm)

Please Describe what happened (Please include fact not opinion)

Type of Incident

Cause Group

Cause

Contributory Factors

Safeguarding Children?  Yes  No

Vulnerable Adults?  Yes  No

Local action you have taken to prevent recurrence

Immediate Action Taken By Reporter

5. Enter any witnesses to the accident/incident where appropriate.
6. Missing persons or police involvement may be relevant in CHC/safeguarding incidents or if you are reporting violent behaviour.
7. Add any further action you feel should be taken as a result.
8. Enter the name of your line manager who will be notified of the incident.
9. Root Cause Analysis is required for Serious Incidents
10. Click SUBMIT.

Witnesses
If statement taken please email or post to the Risk Management Team
Were there any Witnesses? <input type="radio"/> Yes <input type="radio"/> No
Missing Person
Was there a Missing Person? <input type="radio"/> Yes <input type="radio"/> No
Police Involvement
Were the Police involved? <input type="radio"/> Yes <input type="radio"/> No
Further action that needs to be taken
Please add any actions you feel will help prevent this happening again
Add an Action <input type="button" value="Add"/>
Notification
Add a Person to Notify <input type="button" value="Add"/>
Root Cause Analysis
Does this Incident require an RCA? <input type="radio"/> Yes <input type="radio"/> No
<p>Thank you for entering this Incident. When you click Submit it will be sent to the Risk and Complaints Manager and your Line Manager. Clicking save for later saves the form so you can view and edit it later please do not delay submitting the form for too long. After clicking either button make a note of the incident number that comes onto the screen in case you need to refer to the form at a later date. You will be offered the chance print of a copy of the form after you click submit, please click the blue writing not the ok button</p>
<input type="button" value="Save For Later"/> <input type="button" value="Submit"/>

11. Once an accident/incident is submitted, you will receive an automated acknowledgement and an incident number for your records.

12. The CCG Risk & Complaints Manager is electronically notified of incidents reported by staff.

13. The Integrated Governance Department will acknowledge receipt of the incident which is shared with CCG managers and other senior leads as appropriate.

For example:

- a breach of patient identifiable data (PID) would be notified to Information Governance leads/Caldicott Guardian depending on the severity of the data loss or breach.
- an incident relating to nursing or CHC funded care is notified to the CCG Chief Nurse and CHC Manager.

14. You or your manager will investigate/review the incident and determine any learning points to reduce risk of recurrence. The escalation process for formal investigation or external reporting will vary according to the severity level of the incident.

15. You will receive further feedback if further action is taken corporately to address the issue reported.

16. Key themes/analysis will be reported to various sub-committees or groups within Bolton CCG, learning points discussed and disseminated via:

- Team meetings
- Staff Forum meetings
- Staff bulletins
- Chief Officer Staff briefings

For help and advice, contact Diane Sankey or Carol Goodridge on Tel 462213 or email [bolccg.incidents@nhs.net](mailto:bolccg.incidents@nhs.net).