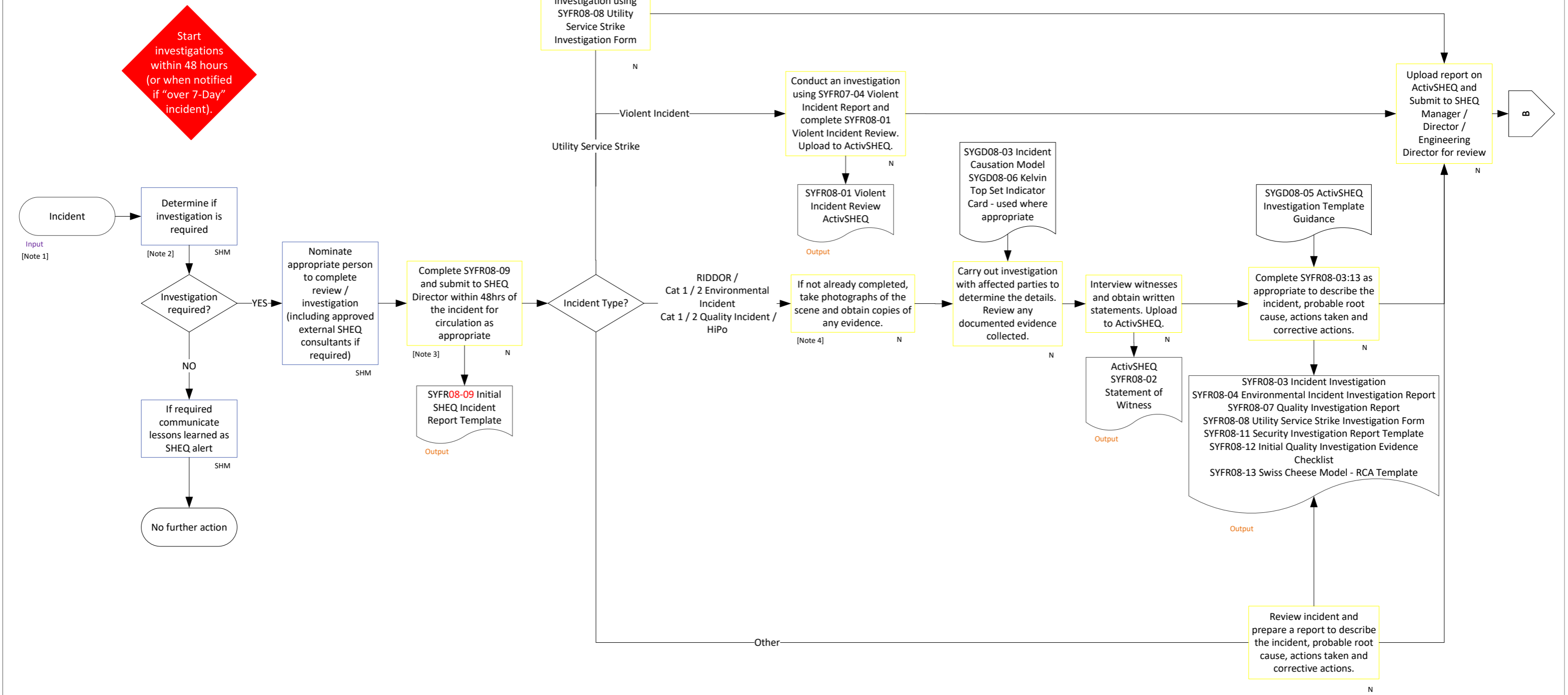
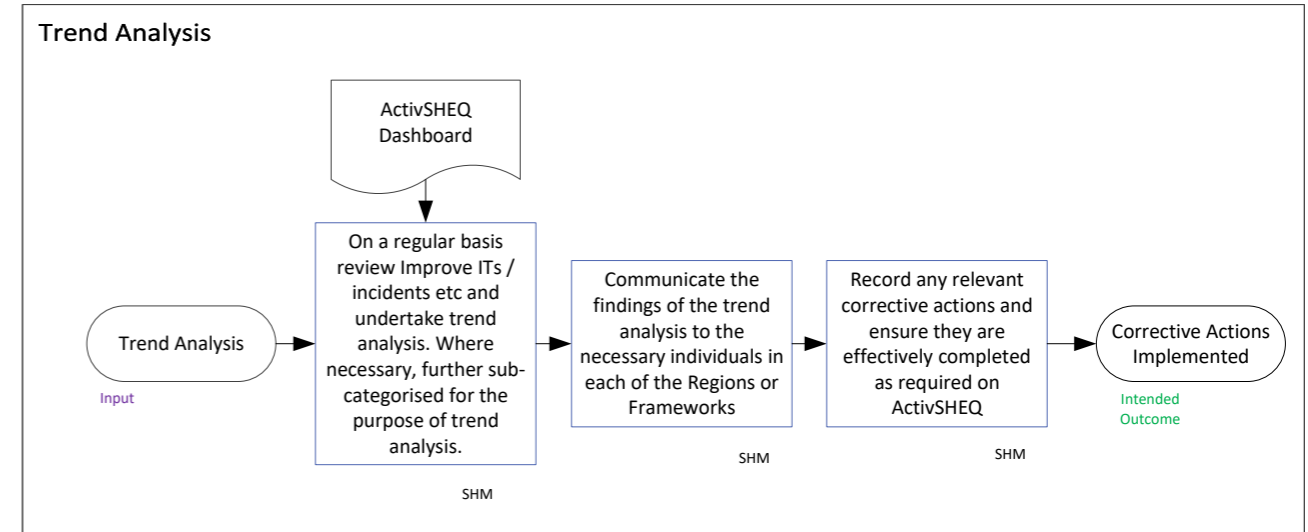
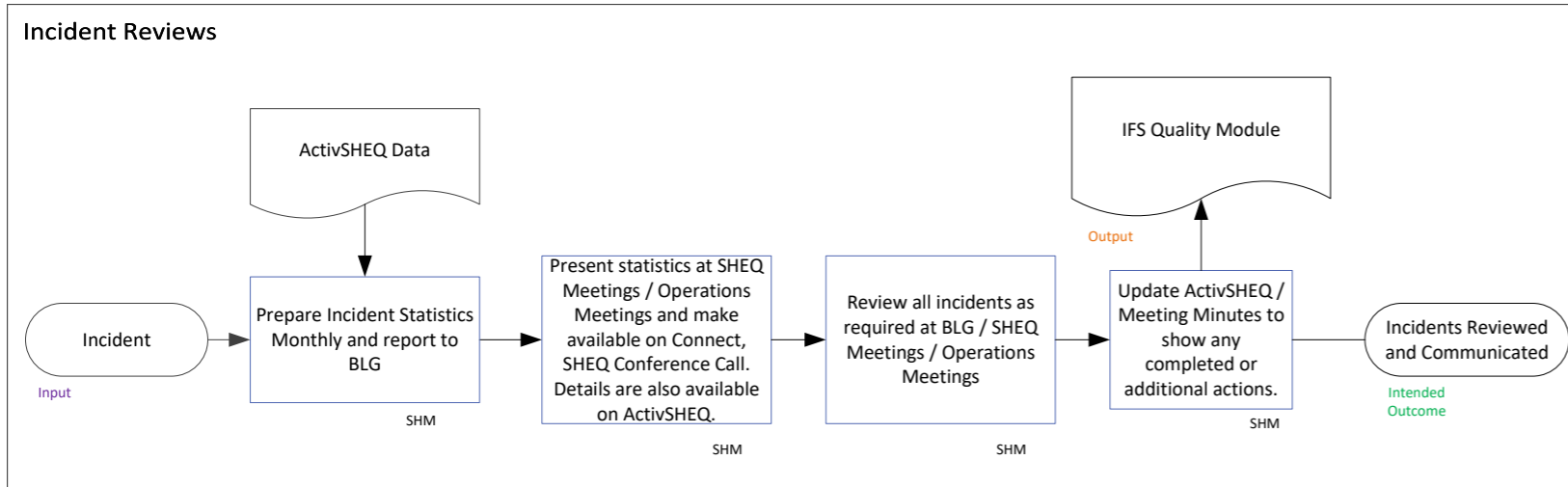
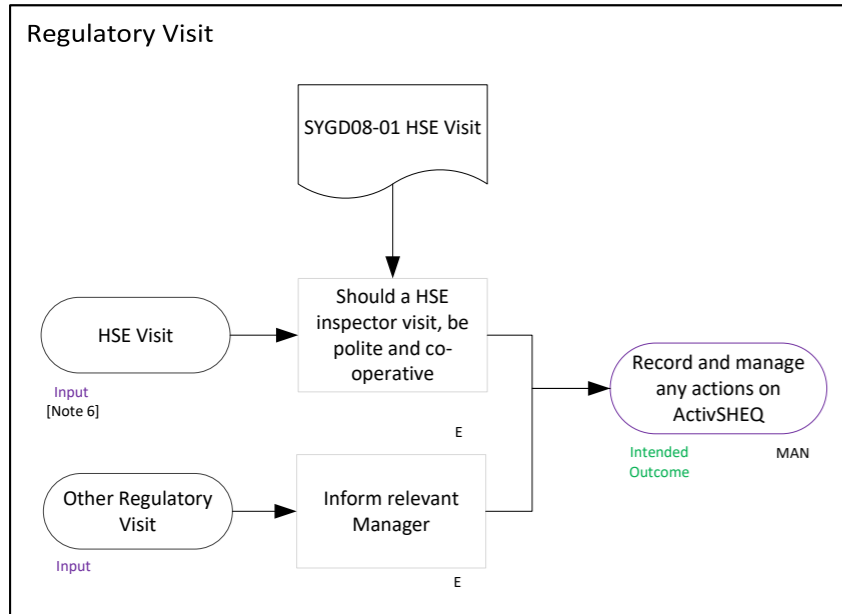
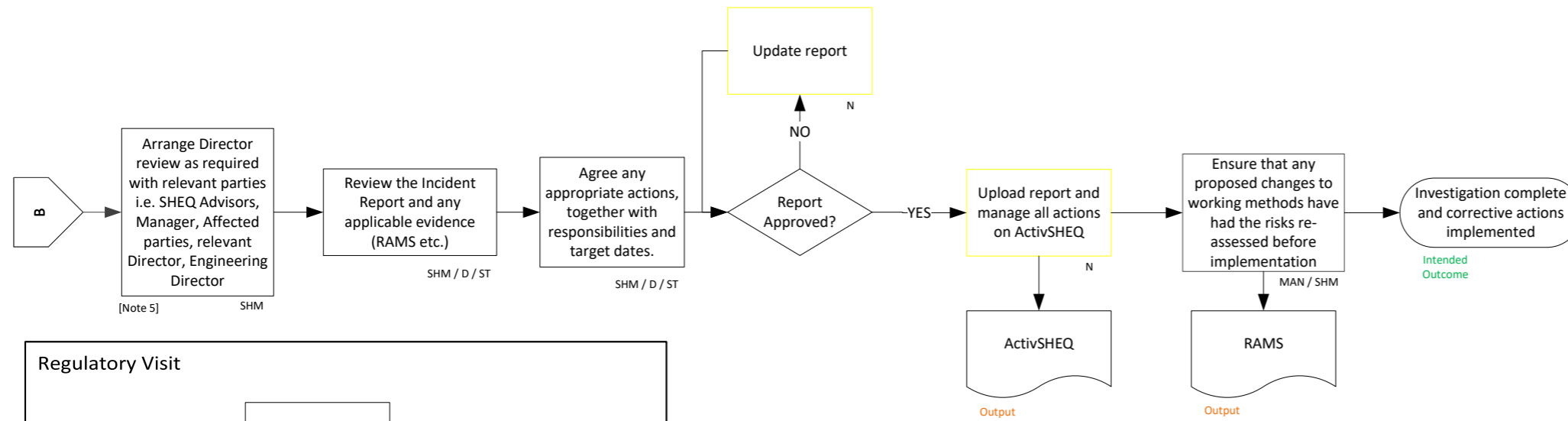


Scope:
 This procedure sets out the arrangements to ensure that when incidents, dangerous occurrences, diseases or Improve ITs occur, reviews and investigations are carried out where required.
 This procedure also describes what to expect and what follow-up actions are to be undertaken on a visit by a HSE Inspector.
 For further guidance see HSE document L73 A guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations.
All investigations undertaken by MWHT shall adhere to SYPD08-02 Just and Fair Culture Process.



RESPONSIBILITIES		
DIRECTOR	NOMINEE	SHEQ DIRECTOR / MANAGER
D	N	SHM
EMPLOYEE	PROJECT / SITE / OFFICE MANAGER	SHEQ TEAM
E	MAN	ST

		Associated Regulations: Environmental Protection Act 1990 Environment Act 1995 Environmental Damage (Prevention and Remediation) (England and Wales) Regulations 2009 Environmental Liability (Scotland) Regulations 2009 Environmental Liability (Prevention and Remediation) Regulations (Northern Ireland) 2009 Environmental Civil Sanctions (Miscellaneous Amendments) (England) Regulations 2010 Environmental Civil Sanctions (Miscellaneous Amendments) (Wales) Regulations 2010 The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013	NOTES Note 1 Incident investigations are to be completed within the required client timescales Note 2 Incident Investigations are required for all Cat 1&2 Env or Quality incidents, Utility Service Strikes, Violent Incidents and any lost time/RIDDOR H&S incidents. Investigation of all other incidents / HiPos is at the discretion of the SHEQ Director / Manager. Note 3 Applicable for Cat 1&2 Quality incidents, Cat 1-2 Environmental incidents (and Cat 3 where deemed appropriate), Utility Service Strikes, Violent Incidents, any minor injury, lost time and RIDDOR H&S incidents and any HiPos. Deadline for Cat 3-4 Environmental and Cat 2 Quality Incidents is 5 working days. Note 4 Examples are, but not limited to, safe systems of work, induction / training records, training and equipment certification, risk assessments etc. General Note This process is subject to revision. The current revision is available on IFS and Company Intranet. This copy is uncontrolled if printed. Company Procedures are the property of MWH Treatment and are confidential. They must not be copied or lent to a third party without prior permission from a SHEQ Manager or Director.
REVISION 8 MAY 2026 REVIEWED BY: C PRICE	IFS DOC NO: SYPD/1392699 AUTHORISED BY: Z ROBERTSON	Definitions: All definitions are listed on Page 3 of this document	



RESPONSIBILITIES		
DIRECTOR D	NOMINEE N	SHEQ DIRECTOR / MANAGER SHM
EMPLOYEE E	PROJECT / SITE / OFFICE MANAGER MAN	SHEQ TEAM ST

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REVIEWED BY: C PRICE	AUTHORISED BY: Z ROBERTSON

NOTES
 Note 5 Mandatory for Category 1 Quality and Environmental Incidents; review for Category 2 Environmental Incidents will be at the discretion of the SHEQ Director and/or Head of Sustainability and Environment.
 Note 6 HSE Inspectors have the right to enter any workplace without giving notice. On a normal inspection visit an inspector would expect to look at the workplace, the work activities, management of health and safety, and check that health and safety law is being complied with.

Definitions:

Action to address Risks Action to eliminate the cause of a potential non-conformity, or other undesirable potential situation to prevent occurrence.
Corrective action Action to eliminate the cause of a detected non-conformity, or other undesirable situation, to prevent recurrence.
Improvement Part of SHEQ management focused on increasing the ability to fulfil requirements.

ActivSHEQ MWH Treatment’s reporting tool
Improve IT! MWH Treatment’s reporting tool for near misses and opportunities for improvement. Improve IT! records incidents in which no damage/injury/loss has taken place, but has had the potential for injury, damage or loss to occur.
Environmental Improve ITs! Are when no environmental incident has occurred but there has been the potential to cause environmental damage. Also see SYGD07-01 incident and Incident Categorisation.


Incident When damage or impact has occurred; or a justified SHEQ-related complaint has been received. External assistance may be required.
Reportable incident An incident which has to be reported to the Enforcing Authorities (LAHO / HSE) as required by the Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR).
Fatality An incident resulting in loss of life.
Specified injury Any injury or condition specified in Regulation 4 of RIDDOR 2013.
Over-seven-day incapacitation An incident where a person is away from work, or unable to perform their normal duties, for more than seven consecutive days, but is not a major injury. This does not include the day of the incident but includes all other days, e.g. weekends and rest days. The report must be made within 15 days of the incident.
Lost-time incident An incident where a person is incapacitated for work for more than 1 hour but less than seven days.
Non fatal incidents to non-workers incidents to members of the public or others who are not at work must be reported if they result in an injury and the person is taken directly from the scene of the incident to hospital for treatment to that injury.
Dangerous occurrence Any occurrence which arises out of, or in connection with, work and is of a class specified in Regulation 7 of RIDDOR 2013.
High Potential (HiPo) - Incidents in which no damage/injury/loss has taken place, but where potential may have resulted in serious incident or ill-health and may have led to a RIDDOR event. These are reported as HiPos on ActivSHEQ.
Positive Intervention (PI) is where positive action was taken prior to a possible incident to prevent the incident from occurring. These are recorded as “positive” Improve Its on ActivSHEQ.
Injury - injury defined as mental or physical harm due a work related incident
First Aid Injury - injury defined as mental or physical harm due a work related incident requiring assistance and / or treatment from a first aider.
Medical Treatment - Injury defined as mental or physical harm due a work related incident requiring assistance and / or treatment from a physician or other medical personnel.
RIDDOR – Occupational Diseases - Occupational diseases that are reportable to the HSE under Regulation 8 of RIDDOR.

Environmental Incidents when environmental damage, harm, pollution, nuisance or legal non-compliance has occurred. Incident classification is divided into four different categories.
 Category 1 – Major, serious, persistent and/or extensive impact or effect on the environment, people and/or property; and / or legal non-compliance resulting in prosecution, fines or notices.
 Category 2 – Significant impact or effect on the environment, people and/or property where external assistance may be required, for example from the Environmental Regulator, Emergency clean up contractor, Police or Fire service; and / or legal non-compliance requiring significant resources to address.
 Category 3 – Minor or minimal impact or effect on the environment, people and/or property with no external assistance was required; and/or legal non-compliance which is addressed easily.
 Category 4 – Substantiated incident with no or very minimal environmental impact to the environment but potential to become at least a Category 3 incident (at the discretion of the Environmental Advisor).

Note that the category for an environmental incident will be determined by the Environmental Manager **after** the incident has been reported.

Quality Incidents are divided into 3 classifications
 Category 1 – Any quality issue identified by the client, post-handover, which has led to an investigation.
 Category 2 – Any quality issue identified internally which has led to an investigation.
 Category 3 – All internal audit quality major non-conformances and all verified quality issues identified by the Client, post-handover, which do not give rise to an investigation.

BLG Business Leadership Group
HSE Health & Safety Executive
SS&E Supervisor Site Safety and Environmental Supervisor

		NOTES
		None
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