

Accident and Incident Reporting Procedure

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Target Audience	CCG staff
Approving Committee	Health & Safety Committee
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Policy Author	CCG Risk & Complaints Manager
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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
1.4	Dec 2015	Diane Sankey	Revised Appendix A – Accident & Incident Reporting
2	April 2019	Diane Sankey	Policy review and reporting process updated. Approved by H&S Committee April 19.

Analysis of Effect completed:	By: D Sankey	Date: April 2019
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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. GMSS 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, Patient Safety & Governance Lead dianesankey@nhs.net Tel 462023 or Liz Mathew, Quality & Safety Support Officer on Tel 4622013.

2.1 Serious Incident Framework

NHS England and NHS Improvement has a Serious Incident Framework (last updated in March 2015 and is under review as at April 2019) relating to serious incidents about NHS commissioned care. Further information can be found here: <https://improvement.nhs.uk/resources/serious-incident-framework/>

The CCG Operational Policy for the Performance Management of Serious Incidents (QS003) is available on the shared drive at <N:\Corporate Office\CCG Policies\Quality&Safety Policies>.

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 Governance & Safety Team.

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.

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. The CCG's Information Governance Officer is responsible for reporting to HSCIC via the Data Security & Protection Toolkit

Camilla Bhondoo, Information Governance Officer 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

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 Patient Safety & Governance Lead

Overall responsibility for the Accident & Incident Reporting Procedure lies with the CCG's Patient Safety & Governance Lead 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 Resolution
 - 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, Patient Safety & Governance Lead, Health & Safety Representatives)
- Providing feedback to people involved in an accident/incident
- Liaise with Governance & Safety Team 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:

- Health & Safety representatives
- Patient Safety & Governance Lead
- Line manager/Associate Director
- Specific training on incident reporting
- Governance & Safety Team

- 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 <http://sgmvmresap78/safeguard/>

Remember, you need to be signed into the CCG intranet as a member of staff. 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 or contact the Governance & Safety Team on Tel 462013.

6 Incident review and notification process

Once a report is submitted, an incident number is generated and the Patient Safety & Governance Lead notified. Line Managers are also notified of a staff incident report. The Governance & Safety Team will acknowledge receipt to the reporter and ensure relevant managers and senior leads are notified.

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 Head Nurse for Quality & Personalisation
 - FNC Manager
 - 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 reviewed or investigated the cause of an accident/incident the Governance & Safety Team will take steps to ensure that:

- Learning/action taken 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
- Staff Focus – issued by the Communications & Engagement Team

8 Reporting of themes and trends

8.1 Routine Reporting

Analysis of incidents themes, residual risks, 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 require 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 NHS Digital Data Protection & Protection toolkit will be reported in the CCG's Annual Governance Statement.

8.3 Annual Governance & Safety Report

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

- Quality & Safety 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.	Does the document/guidance affect one group less or more favourably than another on the basis of:		
	• 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.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are there any exceptions valid, legal and/or justifiable?	No	
4.	Is the impact of the document/guidance likely to be negative?	No	
5.	If so, can the impact be avoided?	-	
6.	What alternative is there to achieving the document/guidance without the impact?	-	
7.	Can we reduce the impact by taking different action?	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 01204 462398

Appendix A

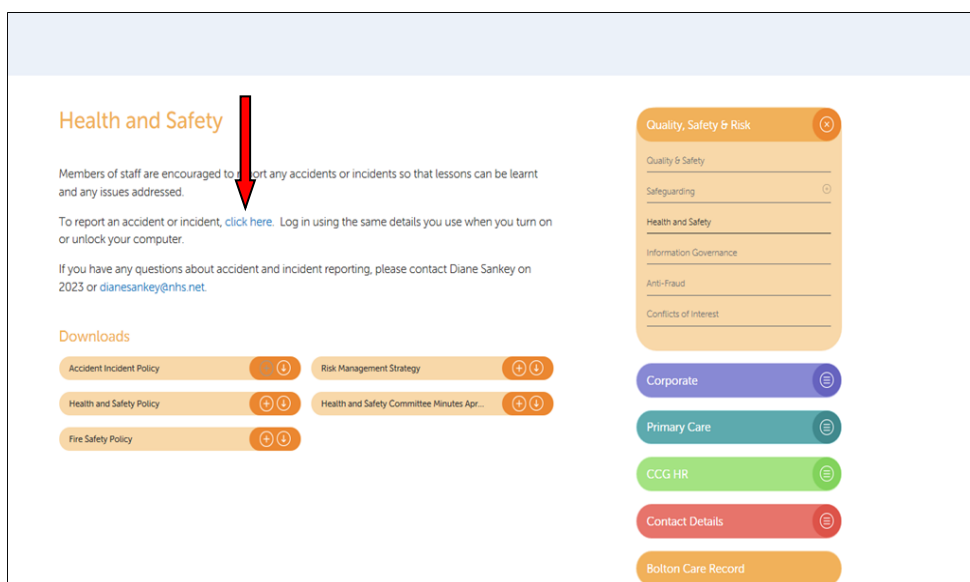
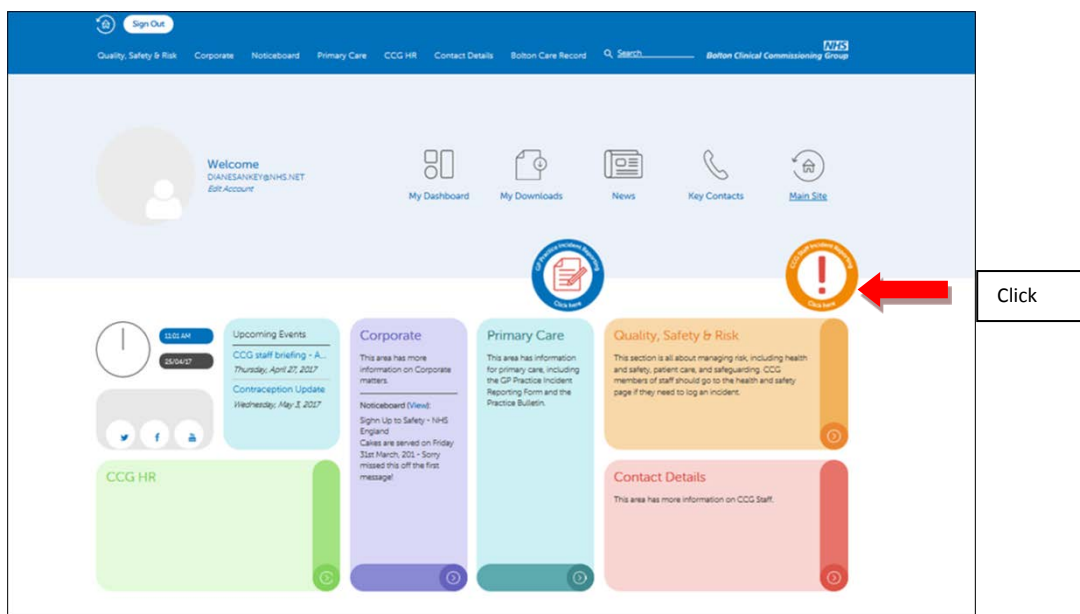
Bolton CCG Accident & Incident Reporting Procedure

Incidents should be reported via the incident reporting tool **Safeguard system** on the intranet.

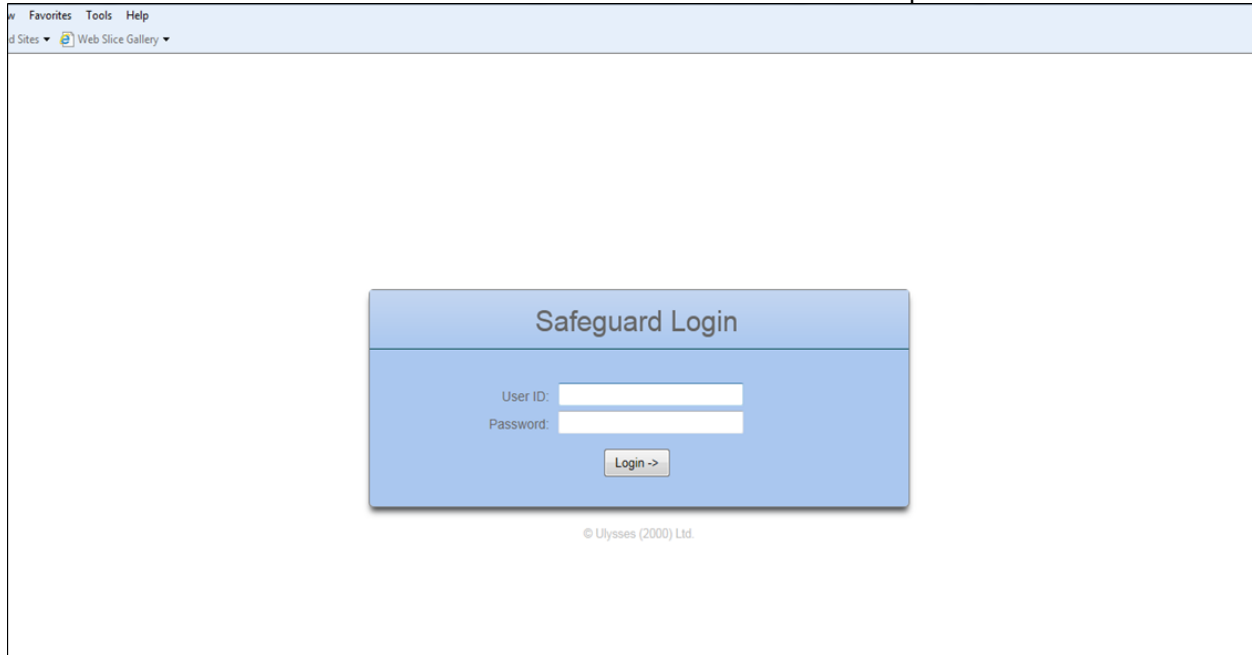
Link to Safeguard Login : <http://sgmvmresap78/safeguard/>

If you have no access to the intranet, details should be reported to bolccq.incidents@nhs.net or to the Governance & Safety Team, St Peters House on Tel 462213.

You need to be signed into the CCG intranet



1. Log into Safeguard System



Use your normal user name e.g. john.smith and password for your PC

2. Insert or update your details if necessary

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 BoICCG.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	<input type="text"/>
First Name	<input type="text"/>
Job Title	<input type="text"/>
Job Status	<input type="text"/>
Organisation	<input type="text"/>
Site	<input type="text"/>
Department	<input type="text"/>
Directorate	<input type="text"/>
Contact No.	<input type="text"/>
Ethnicity	<input type="text"/>
Email Address	<input type="text"/>
Contact Details	<input type="text"/>

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)?

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

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.
6. Enter any witnesses to the accident/incident where appropriate.
7. Missing persons or police involvement may be relevant in CHC/safeguarding incidents or if you are reporting violent behaviour.

8. Add any further action you feel should be taken as a result.
9. Enter the name of your line manager who will be notified of the incident.
10. Root Cause Analysis is required for Serious Incidents
11. 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 style="font-size: small;">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"/>

12. Once an accident/incident is submitted, you will receive an automated acknowledgement and an incident number for your records.
13. Your line manager or the Associate Director of your department will be notified electronically of your incident and should discuss any actions/learning with you.
14. The Governance & Safety Team is automatically notified of any staff incidents and will acknowledge receipt and ensure the incident 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 Funded Nursing care is notified to the CCG Head Nurse for Quality & Personalisation.

15. The immediate response to an incident and the escalation process for investigation or external reporting will vary according to the severity level of the incident.
16. You will receive further feedback if further action is taken to address the issue reported.
17. 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
 - Health & Safety Committee (staff accidents)

For help and advice, contact Diane Sankey, Carol Goodridge or Elizabeth Mathew

Tel: 462213

Email: bolccg.incidents@nhs.net.