



Circle Voluntary Housing Association

Incident Management Policy

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Policy Owner	Russell Grainge
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Contents

1.0 Values:.....	3
2.0 Introduction:	3
2.1 Definitions:.....	4
3.0 Policy:.....	4
4.0 Purpose:	5
5.0 Scope:.....	5
6.0 Roles and Responsibilities:	5
6.1 Board of Directors:.....	5
6.2 Chief Executive Officer (CEO):	5
6.3 Leadership team:	6
6.4: Management Team:	6
6.5: Department Directors/ Mangers:	7
6.6: Director of Property:.....	7
6.7 Human Resources (HR) Department:	8
6.8 Health & Safety Committee:.....	8
6.9: Complaints Officers:	8
6.10: All Circle Voluntary Housing Association Employees:	8
7.0 Dissemination:	9
8.0 Implementation:	9
9.0 Review and Audit of Policy and Procedure:	9
10.0 Related Policies & Procedures:	9
11. References:	9

1.0 Values:

The actions we take underpin our vision to make a difference by providing quality homes for people in housing need. At Circle Voluntary Housing Association, we firmly believe that how we interact with our customers, communities, colleagues, and key stakeholders is of fundamental importance. Our passionate commitment to caring about our tenants and the services we deliver has led to the development of our core values - six behaviour-based principles that speak directly to the characteristics we hold high.

WE HEAR

Willingness to embody all our values in a driven manner.

Empowerment of our staff and tenants.

Honesty allows for complete understanding, it aids in the delivery of integrity and putting our tenants' best interests at the heart of our decision-making.

Excellence reminds us of our continuous strive to be better.

Accountability benefits all, transparency will foster this, and the creation of solid and reliable documentation will ensure that this accountability is enforced.

Respect is the foundation of these values, without respect for us, others and the service we provide we must ask ourselves why we put so much of our valuable time into the job we do.

2.0 Introduction:

Circle Voluntary Housing Association places the highest priority on the safety and wellbeing of employees, contractors, tenants, visitors and others affected by work carried out by or on behalf of the organisation. It is the policy of Circle Voluntary Housing Association that all incidents, accidents and near misses are reported, reviewed, and where required, investigated to ensure that there is learning from such events so that quality of services and safety within the organisation are improved.

Circle Voluntary Housing Association recognises the importance of learning from incidents and therefore promotes an environment which staff are encouraged to report, investigate, disseminate, and implement learning from accidents, incidents, near misses.

Circle Voluntary Housing Association is committed to:

1. Promoting a just, proportionate, and consistent approach to the management and investigation of incidents.
2. Protecting the wellbeing of its staff, tenants, contractors, and others.
3. Demonstrating compliance with legislative and regulatory requirements particularly those set out under the Safety Health and Welfare at Work Act, 2005, the Safety Health and Welfare at Work (General Applications), 2007, and any other relevant legislation and regulation.
4. Managing and investigating incidents in a timely and cost-effective way and in a manner which Circle Voluntary Housing Association management, staff, contractors, and others can be confident in.

This Incident Management Policy and associated procedure replaces all previous Incident Management Policies and Procedures and must be applied consistently throughout the organisation for the management of all incidents.

This policy is intended to be used in conjunction with other relevant policies and guidance's listed in Section 10.0.



Fig. 1: Stages of Incident Management

2.1 Definitions:

Accident	An unplanned, unexpected, and undesired event, usually with an adverse consequence. <i>Person</i>
Incident	An unexpected or unplanned event which caused unintended or unnecessary harm, or damage to, or loss of property. <i>Item</i>
Near Miss	An incident which could have resulted in harm but did not either by chance or timely intervention. <i>Something nearly happened</i>

3.0 Policy:

It is the policy of Circle Voluntary Housing Association that all incidents are identified, reported, and investigated. Incidents can include but are not limited to:

- Accidents
- Incidents
- Critical or serious event
- Near miss
- Incidents reported through the Circle Voluntary Housing Association complaints process

4.0 Purpose:

The purpose of this Policy is to establish the scope, roles and responsibilities associated with Circle Voluntary Housing Association process for the reporting, investigation, and management of all incidents, accidents and near misses. This Policy considers the standards of relevant bodies including the Approved Housing Bodies Regulation Authority (ABHRA), the Health and Safety Authority (HSA), and others.

In addition, this Policy and the associated Procedure ensures that because of all incident reviews and investigations, learning takes place and practices are developed and improved throughout the organisation to prevent similar incidents happening again.

5.0 Scope:

This policy applies throughout Circle Voluntary Housing Association and shall be read in conjunction with other relevant policies listed in Section 10.0.

6.0 Roles and Responsibilities:

Governance arrangements for incident management are required at all levels within Circle Voluntary Housing Association, e.g., Board level, Leadership, Management, and service delivery levels. These arrangements ensure that there is clear accountability for incident management and that all staff are aware of their responsibilities and accountability.

While all Circle Voluntary Housing Association staff have responsibilities in relation to incident management, certain members of Circle Voluntary Housing Association have specific duties and responsibilities. The duties are outlined as follows:

6.1 Board of Directors:

Circle Voluntary Housing Association Board of Directors retains corporate responsibility for risk management including incident management. The designated Senior Accountable Officer, currently the Director of Property, will provide the Board with necessary information to enable the Board to discharge its incident management responsibilities effectively.

The Board in relation to incident management will perform the following:

- Consider annual reports and annual assurance statements. These reports should include qualitative and quantitative analysis of for example, the number of incidents per year; the classification and category of reported incidents; the learning and change in practices.
- Consider any critical incidents.
- Delegate its responsibilities and functions in accordance with the arrangements set out in this policy.

6.2 Chief Executive Officer (CEO):

The Chief Executive Officer (CEO) of Circle Voluntary Housing Association has ultimate accountability and responsibility for the services under their governance. The CEO also has overall responsibility for risk management within Circle Voluntary Housing Association. This includes incident management, reporting, investigating, and learning from individual incidents and incident trends.

The CEO will fulfil these responsibilities by leading by example in fostering a just and supportive culture with non-punitive reporting within Circle Voluntary Housing Association.

It is the role of the Chief Executive Officer (or his/ her/their senior nominee) to:

- Ensure that all Circle Voluntary Housing Association staff comply with this Policy.

- Commission and chair incident management teams for incidents which result in death or serious harm and are rated as critical or serious.
- Commission system analysis investigations of incidents of death and serious harm in accordance with organisational investigation process.
- Ensure that a sufficiently trained resource (whether internal or external to Circle Voluntary Housing Association), is in place to complete thorough investigation for all incidents in accordance with this Policy.
- Ensure that aggregate analysis, investigations, and look-back reviews are completed in a timely and cost-effective manner.
- Have clear systems of governance in place to manage all incidents including incidents that result in death or serious harm.
- Be accountable for quality and safety within services under their governance.
- Ensure that robust systems are in place to both proactively and retrospectively enhance quality and safety systems throughout Circle Voluntary Housing Association.
- Have clear systems of governance in place to implement the recommendations of investigation reports.
- Ensure, in so far as is reasonably practicable, that the correct Circle Voluntary Housing Association processes are followed regarding access requests, media queries and briefing documents in relation to the management of incidents.

6.3 Leadership team:

The Leadership Team of Circle Voluntary Housing Association shall ensure, in so far as is reasonably practicable that:

- A lead for health and safety within the organisation is identified.
- Arrangements are in place for governance to provide assurance regarding health and safety.
- A policy for incident reporting and management is implemented that clearly sets out how incidents will be identified and reported by staff and managed within Circle Voluntary Housing Association.
- Mechanisms are put in place to ensure appropriate action is taken and referrals made to professional regulatory bodies as necessary.
- Investigations take place as appropriate and that learning because of such investigations is used and shared to prevent recurrence.
- Arrangements are in place to ensure that all staff receive training and development in relation to the reporting and where appropriate, the investigation of incidents.
- Systems are in place to identify trends in near misses and to identify where those trends need immediate action.

6.4: Management Team:

All Managers shall:

- Be responsible for the delivery of compliance with and monitoring of this Policy in areas which fall within the scope of their operational responsibilities.
- Be fully supportive of their officers and staff in areas which fall within their scope of operational responsibilities to undertake their responsibilities in accordance with this policy.
- Ensure that the Leadership Team is briefed on all serious incidents monthly.
- Make suitable and sufficient arrangements to ensure that all staff within their areas of operational responsibility receive appropriate training and development in relation to the reporting and where appropriate, investigation of incidents.
- Ensure, in so far as is reasonably practicable, that accident, incident or near miss reviews or investigations for those categorised as Major, Moderate or Minor are closed off within 30 calendar days from commencement of investigation. For incidents classified as Critical or

Serious, these investigations are closed off within 120 calendar days from commencement, unless mitigating circumstances have been considered and the Senior Accountable Officer has approved an extension to the closure date. In such circumstances, the investigation process shall be closed off as soon as possible after the initial 120 days.

- In conjunction with the Senior Accountable Officer for Circle Voluntary Housing Association (or their delegate), devise, implement, allocate tasks, and monitor to point of completion all Corrective and Preventative Action plans (CAPA) as required.

6.5: Department Directors/ Mangers:

All Department Directors and Line Mangers shall be responsible for the delivery of compliance with and monitoring of this Policy in areas which fall within the scope of their operational responsibilities. Upon notification of an incident, the Department Director/ Manager must attend to the following:

- Ensure that the situation has been made safe.
- Review the incident record and oversee any further immediate actions which need to be taken post incident.
- Complete the incident report within CalQrisk, and determine the most appropriate category and rating for the incident. This will inform the way the incident is to be managed or investigated.
- In conjunction with the Senior Accountable Officer (or their delegate), devise, implement, allocate tasks, and monitor to point of completion all Corrective and Preventative Action plans (CAPA) as required.
- Determine from the record if any regulatory notification or escalation of the incident is required and ensure this occurs and notify the HR Manager of such.
- Following the incident, the Department Director/ Manager is also responsible for ensuring that any staff involved in any incident receives appropriate support from the organisation.
- Ensure that staff directly involved receive feedback from all incidents reported.
- Ensure feedback is provided to all their staff on all health and safety matters within their area of responsibility, including investigations, and any resulting actions taken to prevent recurrence. This feedback should occur during regular team meetings at which Health and Safety matters are discussed as a standing item.
- Ensure all staff reporting to them have adequate information, instruction, training, and supervision in the management of accidents, incidents or near misses.
- In conjunction with the Senior Accountable Officer (or their delegate), devise, implement, allocate tasks, and monitor to point of completion, all Corrective and Preventative Action plans (CAPA) as required.

6.6: Director of Property:

The Director of Property is currently the appointed Senior Accountable Officer for Circle Voluntary Housing Association health & safety matters and is responsible for ensuring that an adequate system is in place for incident management, including reporting at all levels up to Circle Voluntary Housing Association Board level.

The Director of Property or their nominee shall:

- Ensure that a Circle Voluntary Housing Association wide incident reporting system is in place. This is currently the CalQRisk database.
- Ensure that sufficient arrangements are in place to escalate investigation reporting and corrective action planning as necessary, disseminate information, monitor compliance, and share lessons learned through the Circle Voluntary Housing Association governance structure.
- Be responsible for ensuring the provision of data and production of regular reports for various Circle Voluntary Housing Association meetings and to approved committees regarding any health and safety incidents, based on an analysis of incident trends and lessons learned.

- Where clusters of similar low risk incidents are identified, consider Root Cause Analysis to identify local trends.
- Review all reported accidents, incident, near misses and request additional information or amendments from report writer as necessary.
- Ensure HR Department report details of incidents to the Health & Safety Authority (HSA) and Circle Voluntary Housing Association's insurance company as necessary.

6.7 Human Resources (HR) Department:

The HR team are responsible for reporting of incidents to the HSA, where a staff member was absent for more than three working days because of workplace associated injury or illness, and or where an accident has occurred which falls under any of the following definitions:

- "Arising in the course of employment resulting in personal injury to the person carrying out the work activity. This could be an injury to an employee who is actually doing the work. For example: an employee dislocates a shoulder while manually moving a heavy load or an employee dealing with the public is assaulted."*
- "Arising in the course of employment which results in personal injury to an employee who was not doing the work that is the subject of the accident. For example: a shelving system collapses and injures an employee who is passing by the scene at the time of the collapse. "*
- "Arising from a work activity which results in personal injury to a person outside of the course of employment. This could be an injury to a non-employee or member of the public. For example: a load falls from a truck that is being used for work purposes and causes an injury to a member of the public who is not at work." – Health and Safety Authority, (2016).*

In addition, the HR Manager is also responsible for reporting to Circle Voluntary Housing Association Insurance Company any accident or incident which resulted in a member of staff being absent from work for three or more consecutive days.

6.8 Health & Safety Committee:

The Circle Voluntary Housing Association Health & Safety Committee has a role in the reviewing of the Circle Voluntary Housing Association Incident Management Policy and Procedure in line with Circle Voluntary Housing Association Policy Framework, or when directed by changes in local practices or national legislation. This group also works collaboratively to improve the health and safety systems and practices within the organisation through the review of incident, accident and near miss information reported.

6.9: Complaints Officers:

Those with responsibility for complaints management within their respective department/ location are responsible for identifying possible incidents from complaints and for liaising with the relevant manager to ensure the incident is reported.

6.10: All Circle Voluntary Housing Association Employees:

In the event of being involved in, witnessing, or becoming aware of an accident, incident or near miss, all members of Circle Voluntary Housing Association staff must:

- Take or support the taking of immediate actions to make the situation safe and reduce the likelihood that harm or further harm will occur.
- Ensure that the incident is accurately and clearly reported within the health and safety database, CalQRisk, as soon as possible, ideally at the first opportunity but no later than within 24 hours from time the incident occurred or was reported.

- Where the potential impact of the incident appears to be serious, staff must notify their manager by telephone at the time of the incident occurring or of them becoming aware of the incident. If the staff members direct line manager cannot be reached, the staff member must contact all other members of the management team on a rolling basis until contact is made to ensure senior staff are informed of serious incident immediately.
- Cooperate with the Circle Voluntary Housing Association investigation procedure in a timely manner in order that root cause analysis and lessons learned can be identified.
- Attend any training that has been designed to develop their awareness and competency as identified for this Policy.
- Participate in the introduction of changes identified because of an investigation.

7.0 Dissemination:

This Policy is available in the Circle Voluntary Housing Association SharePoint Health & Safety Policies folder, located on “CVHA Home Page.”

8.0 Implementation:

In conjunction with requirement to familiarise themselves with this policy and the associated procedure and in support of the implementation of same, all Circle Voluntary Housing Association employees must complete Circle Voluntary Housing Association Incident Management training program.

9.0 Review and Audit of Policy and Procedure:

This Policy will be reviewed in line with the Circle Voluntary Housing Association Policy Framework Document or when directed by changes in local practices or national legislation.

10.0 Related Policies & Procedures:

- Incident Management Procedure
- Risk Management Policy & Procedure
- Complaints Management Policy
- Safety Statement
- Child Protection & Welfare
- Whistle Blowing Policy
- Code of Conduct Policy
- Data Protection Policy
- Staff Training and Development Policy
- Tenant Communication and Engagement Policy
- Visitors to Company Facilities Policy
- Manual Handling Policy
- Anti-Social Behaviour
- Infection and Control Policy
- Driving for Work Policy & Procedure

11. References:

Health and Safety Authority, (2016); Guidance on the Safety, Health and Welfare at Work (Reporting of Accidents and Dangerous Occurrences) Regulations 2016.

https://www.hsa.ie/eng/Publications_and_Forms/Publications/Safety_and_Health_Management/Accident_and_Dangerous_Occurrences_Reporting.pdf