



ACCIDENT INVESTIGATION POLICY (DANGEROUS GOODS TRANSPORTATION)

CONTENTS

- 1.0 Why investigate accidents and incidents?
- 1.1 Who should investigate accidents and incidents?
- 1.2 Carrying out an investigation
- 1.3 Gathering information
- 1.4 Analysing the causes of incidents
- 1.5 Identifying and implementing suitable risk control measures
- 1.6 Recording the investigation

1.0 Why investigate accidents and incidents?

We must investigate all accidents and incidents so we can:

- Ensure action is taken to prevent a recurrence
- Meet statutory requirements
- Help monitor and improve procedures and performance related to the transportation of dangerous goods
- Provide information for responding to claims made against the Company
- Enable the Company to respond quickly and accurately to external enquiries

1.1 Who should investigate accidents and incidents?

The Company Dangerous Goods Safety Advisers (DGSA's) will investigate as required for any incident involving dangerous goods. Any investigation will also include input from either or all the following: Fleet Compliance Manager, Duty Transport Manager and/or the controlling transport desk.

1.2 Carrying out an investigation

An investigation will involve an analysis of all the information available to identify what went wrong and determine what steps must be taken to prevent the adverse event from happening again.

- **Physical** - the scene of the incident
- **Verbal** - the accounts of witnesses
- **Written** - risk assessments, procedures, instructions etc

1.3 Gathering information

To begin an investigation, the first step is to gather all the relevant information. It is important to capture information as soon as possible, this stops it from being corrupted (e.g. items moved etc.). If necessary, work must stop and unauthorised access should be prevented.

The scene of the incident should be made safe and preserved (if it has occurred within Company premises. First Aiders (or the Emergency Services) should be

allowed to treat any injuries but no other changes should be made to the scene until physical information has been gathered. If the incident has occurred in another location such as a public highway such physical information will have to be collected from the driver involved.

Examples of physical information to gather:

- Exact location
- Weather conditions (if applicable)
- Lighting and temperature
- Condition of flooring or work surfaces
- Condition of any equipment or tools involved
- Any chemicals, substances or other materials involved
- Condition of any personal protective equipment (PPE) and if it was worn

An image of the scene can be extremely beneficial in an investigation and capture a lot of physical information.

When conducting an interview it is to be made clear what is happening and the purpose of the investigation.

- Remind them of the details of the incident and why you need to speak to them (e.g. as a witness)
- Give an indication of how long the interview might take, and offer to revisit/come back another time if needed
- Make it clear that this is not about establishing blame but to establish the causes of the incident to find out what could be done to stop it happening again
- Indicate what will happen with any findings (e.g. further investigation)

The DGSA's will speak to those involved to gather information to fill any gaps and find out more. These could be informal interviews at the scene. You should note the names of those involved including any witness before they leave the area as you may not be able to interview them at the scene or may require a more detailed interview later.

Examples of written information include:

Date and time

Location

Risk assessments

Safe systems of work/procedures/method statements

Safety data sheets

Maintenance records for vehicles

Local inspection records (e.g. equipment pre-use checks)

Training and induction records

Shift times/rotas

Information from the relevant Dangerous Goods Note (DGN) such as UN Number, Classification, Packing Group etc

1.4 Analysing the causes of incidents

Accidents and incidents have many causes. What may appear to be bad luck (being in the wrong place at the wrong time) can, on analysis, be a chain of failures and errors that lead almost inevitably to the adverse event.

These causes can be classed as:

- Immediate - the agent of injury or ill health (other road user's action/manoeuvre etc)
- Underlying - unsafe acts and unsafe conditions (the load not secured correctly etc)
- Root - the failure from which all other failings grow, often remote in time and space from the adverse event (failure to identify training needs and assess competence, unavailability of securing straps etc)

To identify the underlying and root causes, take the immediate cause of the incident and ask the question 'why?' five times. The answer to the why will come from the information gathered as part of the investigation.

1.5 Identifying and implementing suitable risk control measures

Once the underlying and root causes of the incident have been identified, the final stage is to identify suitable measures to resolve the flaws that were identified and implement these measures to prevent recurrence.

This may include:

- Reviewing risk assessments and safe systems of work
- Reviewing or providing further training and/or supervision
- Repairing, maintaining or providing tools and equipment such as load securing equipment
- Providing PPE

1.6 Recording the investigation

Any incident involving the transportation of dangerous goods and the subsequent findings from an investigation are recorded electronically on Company servers by completing a Dangerous Goods incident report form. This enables staff to develop a snapshot of compliance levels. Investigation findings are reported to relevant senior management within the Company.