



# Incident Reporting and Investigation Procedure

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# 1. Introduction

## 1.1 Scope

The requirements of this procedure apply to all Mace employees who have a responsibility to report and investigate health, safety and wellbeing (HSW) and environmental incidents based upon the respective responsibilities detailed in Table 1 below.

## 1.2 Purpose

The purpose of this procedure is to detail the process for:

- Reporting incidents at Mace projects and locations, and also involving Mace people, clients and supply chain at other locations.
- Reporting First Alerts.
- Incident investigation.
- Action closure.
- Sharing and embedding lessons learned.

Fig 1 details the incident reporting and investigation process.

The primary objective of the incident investigation is to prevent repeat incidents for continued improvement.

The investigation process follows a systematic approach through the collection of facts, identification of contributing factors and by undertaking objective analysis of the evidence to establishing root causes.

	First Alert	YellowJacket Entry	Flash Report	Formal or RCA Investigation	Review Client's Contractor Reports
Statutory responsibilities	✓	✓	✓	✓	DCA
Contractual responsibilities	✓	✓	✓	DCA	DCA
Employer responsibilities	✓	✓	✓	DPA	✓
Client responsibilities	✓	✓	✓	DIF	✓

**DCA** - Dependent upon Contractual Arrangements

**DIF** - Dependent upon Initial Investigation Findings

**DPA** - Dependent upon Potential Severity

Table 1: Reporting deliverables

## 2. Roles and responsibilities

Roles and responsibilities for reporting and investigation are provided in Table 2 below.

Roles	Responsibilities
All Mace employees	<ul style="list-style-type: none"> <li>Report incidents as they occur.</li> </ul>
Contractors	<ul style="list-style-type: none"> <li>Report incidents as they occur.</li> </ul>
Authorised person*  *Those trained and given access to issue first alerts e.g. all HSW staff, Responsible Business team and international country managers as required.	<ul style="list-style-type: none"> <li>Create and issue a first alert as per event types in Section 4.2 below via the First Alert System as soon as possible after an incident. The target is two hours.</li> <li>Confirm the development and issue of the flash report.</li> </ul>
Health, Safety and Wellbeing teams	<ul style="list-style-type: none"> <li>Identify level of investigation required.</li> <li>Establish if legal privilege is required before the investigation is initiated.</li> <li>Review investigations reports for incidents relevant to their business.</li> <li>Review all first alerts received for learning/sharing potential.</li> <li>HSW Senior Business Partners/Regional QHSEW Manager to confirm any safety alert/bulletin/knowledge share is produced by the appropriate party.</li> <li>Determine if any improvements to our risk controls or HSW Management System (health and/or safety) are required.</li> </ul>
Business Unit Directors (or equivalent)	<ul style="list-style-type: none"> <li>Review and cascade First Alerts to teams as appropriate.</li> <li>Confirm incidents are adequately investigated with suitable resources and learnings embedded.</li> <li>Check and confirm appropriate escalation within the contractors organisation as required.</li> </ul>
Lead investigator	<ul style="list-style-type: none"> <li>Define the Terms of Reference for the investigation.</li> <li>Coordinate the investigation team.</li> <li>Develop the final report.</li> <li>Logging and allocating actions on Yellow Jacket.</li> <li>Coordinate the close out meeting.</li> <li>Store investigation report and supporting materials/evidence in designated Incidents folder. Contact <a href="mailto:0305.H&amp;SReporting@Macegroup.com">0305.H&amp;SReporting@Macegroup.com</a> for specific incident folder.</li> </ul>
Investigation team	<ul style="list-style-type: none"> <li>Support the Lead Investigator on the investigation.</li> </ul>

**Table 2:** Incident reporting and investigation roles and responsibilities

### 3. Incident reporting & investigation process

Figure 1 below details the incident reporting and investigation process. This details the requirements for Contractors, Mace and other relevant parties further details can be found in section 4 (Incident Reporting) and section 5 (Incident Investigation).

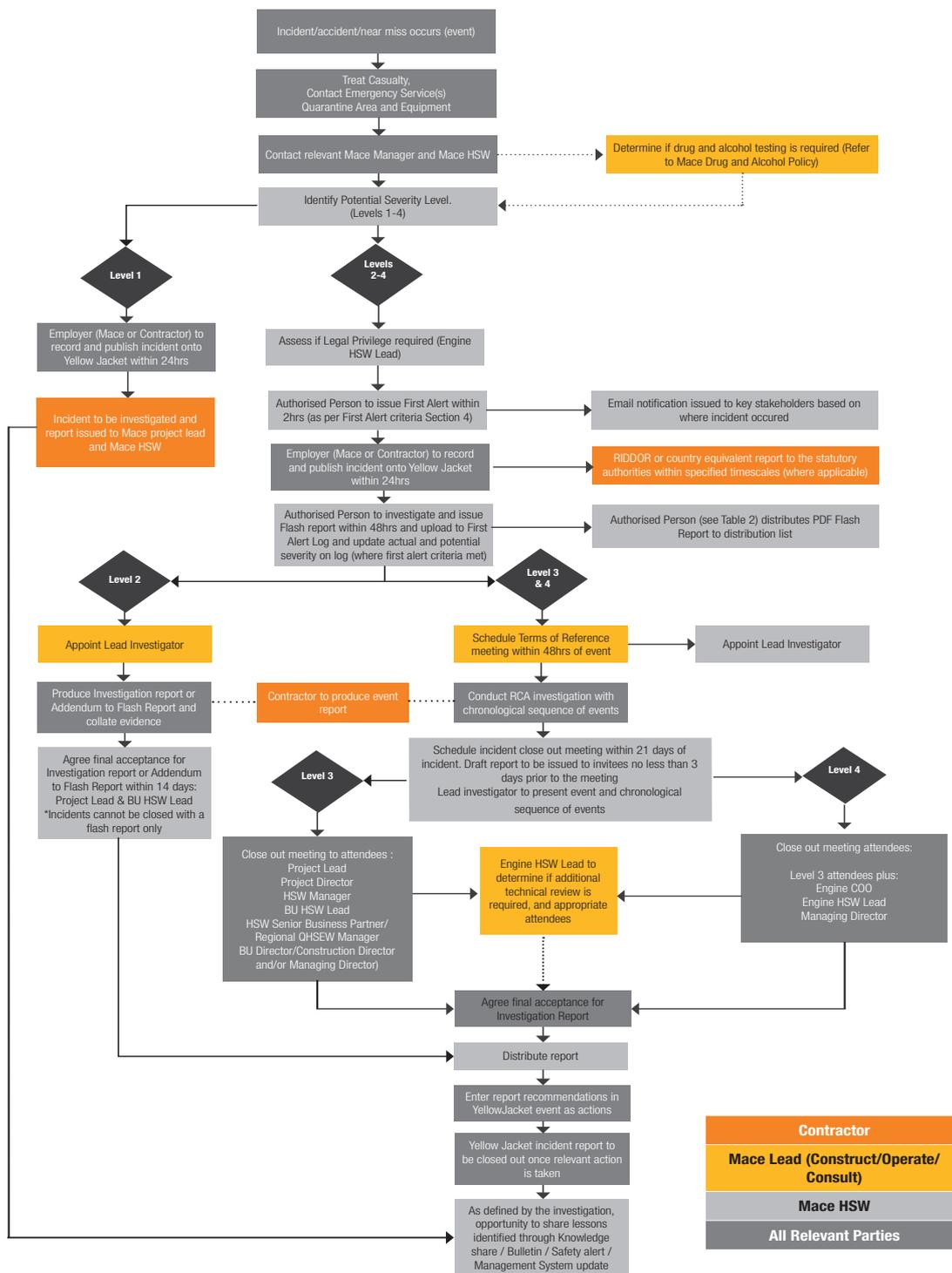


Figure 1: Mace incident and reporting investigation process

## 4. Incident reporting

### 4.1 Yellow Jacket accident and incident reporting

All incidents\* need to be reported in [Yellow Jacket](#) using the consequence classifications in Table 3 below.

Consequence	Sub Classification	Guidance
<b>Injury</b>	<b>Fatality</b>	Death to a worker and non-workers that arise from work related accidents, including an act of physical violence to a worker.
	<b>Specified Major Injury</b>	Specified Major Injury as defined by the UK HSE (or other local regulatory requirements, if higher than UK requirement). <ul style="list-style-type: none"> <li>Fractures and breaks, other than to finger, thumbs and toes.</li> <li>Amputation.</li> <li>Crush Injuries leading to organ damage.</li> <li>Permanent loss of sight.</li> <li>Serious burns (covering more than 10% of the body).</li> </ul> <p><b>Note:</b> May include incidents that result from a Violent act. A more exhaustive list can be found <a href="#">here</a>.</p>
	<b>Reportable Incident (RIDDOR or similar)</b>	An individual is away from work or unable to perform their normal work duties for more than seven consecutive days (not including the day of the accident) *
	<b>Lost time</b>	An injury sustained by an employee during work which results in at least one shift, after the date of the accident, being missed.
	<b>First Aid</b>	Medical treatment administered. No lost shifts with exception of the day of the accident.
<b>Security</b>		Where a confirmed security breach has occurred i.e. intruders on site.
<b>Damage to property</b>		An incident which resulted in damage to Mace, Client, Contractor or member of the public property. Can be further classified within YellowJacket as a Dangerous Occurrence in line with the criteria outlined by <a href="#">UK HSE</a> .*
<b>Damage to environment</b>		An incident which has a negative impact on the environment.
<b>Pre existing Medical Condition (MC)</b>	<b>MC- identified</b>	An individual has declared/identified a pre-existing medical condition.
	<b>MC - unidentified</b>	An individual hasn't declared a pre-existing medical condition.
<b>Industrial Disease</b>	<b>Occupational Disease</b>	Cases of certain diagnosed reportable diseases which are linked with occupational exposure to specified hazards. The reportable diseases and associated hazards are defined in Regulation 8 of The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013. If higher local standards apply then these should also be reported.
	<b>Carcinogens, Mutagens and Biological agents</b>	Cases of cancer where there is an established causal link between the type of cancer diagnosed, and the hazards to which the person has been exposed through work. These hazards include all known human carcinogens and mutagens, including ionising radiation. All diseases and any acute illness needing medical treatment that is attributable to a work-related exposure to a biological agent.
<b>Near Miss</b>		An incident which had the potential to result in one of the following consequences: <ul style="list-style-type: none"> <li>Industrial disease</li> <li>Injury</li> <li>Security</li> <li>Damage to environment</li> <li>Damage to property</li> </ul> <p>This can be further classified within Yellow Jacket as a Dangerous Occurrence inline with the criteria outlined by UK HSE.**</p> <p><b>Note:</b> A near miss should only be reported where the incident does not meet one of the other Incident Types noted above.</p>

**Table 3:** Yellow Jacket Incident Classifications

\* Where local regulatory bodies have more stringent standards than the UK HSE then these should also be reported.

\*\* HSW and Environmental incidents **must not** be reported as Non Conformance. This classification only relates to quality.

## 4. Incident reporting

### 4.2 First Alert reporting

- The [Mace First Alert](#) reporting process is designed to notify Group Board, Business Unit Directors (or equivalent), the Health, Safety and Wellbeing teams and the Responsible Business teams of significant/adverse safety, health and environmental events identified in Table 4 below in a consistent/concise and timely manner.
- Legal privilege needs to be considered prior to reporting a first alert or commencing an investigation (usually in the case of a very serious incident where it is considered Mace are likely to be prosecuted). Where a HSW Manager/BUD believes this may be required, then this should be agreed with Engine HSW Lead.
- The target for issuing a First Alert is two hours.
- Table 4 below details the incident types that must be reported as First Alerts. Where an injury occurs, then the level of Injury must also be identified in the system.
- A flash report is required within 48 hours and uploaded to the First Alert log to include actual and potential severity levels (see Table 5).

Classification	Incident Type
Injury	Injury requiring transfer to hospital by ambulance/emergency vehicle.
Client/3rd Party	Incident with a significant impact on member of the public/client/3rd party assets e.g. equipment and property.
Regulatory	Reportable or potentially reportable event.
	<b>Potential/actual enforcement action from regulatory body</b> e.g. prohibition and improvement notices, fees for intervention.
High Potential Incident	<b>Serious near miss.</b> An unplanned event that under different circumstances may have resulted in a serious or fatal injury; or any injury to a member of public or damage/loss to a third party.
	Confirmed unauthorised entry to Mace project, office or premises under Mace control.
	<b>Project related adverse media attention or potential reputation risk to Mace or a Client</b> e.g. local or national media attention, external complaints (noise, vibration, out of hours working).

**Table 4:** First Alert incident type classification

# 5. Incident Investigation

## 5.1 Investigation levels

Incidents shall identify the potential severity levels in YellowJacket (YJ) (See Table 5). The highest Potential Severity Level shall determine the level of investigation undertaken. When determining the potential severity, it is important to consider if the potential severity could have reasonably occurred. For example, where a minor cut occurs, it is reasonable to state that this is not a Level 3 or Level 4 potential severity. However, if the cut affected an artery or major blood supply and the flow of blood could not be controlled locally, then it may be reasonable to report this as a Level 3 or Level 4 depending on the specifics of the incident.

Potential Severity	YellowJacket Reference	Guidance	Investigation Levels
Level 1	Negligible	Examples include: <ul style="list-style-type: none"> <li>• First Aid injury.</li> <li>• Minor damage to Mace property.</li> </ul>	Yellow Jacket Investigation: <ul style="list-style-type: none"> <li>• This investigation will involve a short investigation by the relevant supervisor or line manager into the circumstances of the event, to try to prevent a recurrence and to learn any general lessons.</li> <li>• The project/location HSW manager is responsible for identifying who the lead investigator is. This may be delegated directly to the contractor. <b>Note:</b> For Mace Operate projects this may be the Account Manager.</li> </ul> This needs to be completed for all incidents, regardless of whether a higher investigation level is identified.

**Table 5:** Levels of investigation

## 5. Incident Investigation

Potential Severity	YellowJacket Reference	Guidance	Investigation Levels
Level 2	Marginal	<p>Examples include:</p> <ul style="list-style-type: none"> <li>• Lost time Injury.</li> <li>• A reportable incident with limited learning opportunities – e.g. slip, trip, on same level on level ground (the decision not to investigate fully will be decided by the HSW Business Partner/ Regional QHSEW Manager/Responsible Business Lead only)</li> <li>• Damage to Mace property without significant damage/cost.</li> <li>• Damage to Client or public property which does not have significant damage/ cost.</li> <li>• Negative regional/local media coverage affecting company image.</li> <li>• Short-term transient environmental or community impact; or Environmental impacts focused onsite with no or only minor offsite impacts.</li> <li>• On/offsite impacts with clean-up assistance needed.</li> <li>• High profile community concerns raised – requiring significant rectification measures and/or involvement of a government or statutory authority.</li> </ul>	<p>A Level 2 incident needs to consider if Legal Privilege is required. Where a HSW Manager/Project Lead believes this may be required, then this should be agreed with HSW Engine Lead before commencing the investigation.</p> <p>A Level 2 incident requires a <b>Project Level Investigation</b>:</p> <ul style="list-style-type: none"> <li>• A <a href="#">flash report</a> within 48hrs and collation of evidence (where incident meets first alert criteria).</li> <li>• The investigation will be completed by the HSW Manager or Responsible Business Lead with input from other stakeholders - e.g. relevant supervisor or line manager, and employee representatives into the circumstances of the event, to try to prevent a recurrence and to learn any general lessons</li> <li>• The Project/Operational Lead is responsible for identifying who the lead investigator is.</li> <li>• Where agreed by the HSW Senior Business Partner/Regional QHSEW Manager (Operate) or Responsible Business Lead, an investigation report will be produced and completed within 14 days of the event. This report will either be an <a href="#">addendum to Flash report</a> or <a href="#">full investigation report</a>. A root cause analysis is optional dependent on learning and the discretion of HSW Senior Business Partner/Regional QHSEW Manager (Operate).</li> </ul>

**Table 5:** Levels of investigation

## 5. Incident Investigation

Potential Severity	YellowJacket Reference	Guidance	Investigation Levels
Level 3	Critical	<p>Examples include:</p> <ul style="list-style-type: none"> <li>Life changing injury or illness (may result from occupational exposure or environmental incident).</li> <li>Dangerous Occurrence in line with the criteria outlined by UK HSE.</li> <li>Specified Major Injury/Reportable injury above that described in Level 2 above</li> <li>Damage to Mace property with significant damage/cost.</li> <li>Damage to Client or Public property with significant damage/cost.</li> <li>Involvement from the Police or Enforcing Authority</li> <li>Negative national media coverage affecting company image.</li> <li>On or off site impacts with significant clean up assistance needed and/or government statutory penalties/litigation likely.</li> </ul>	<p>A Level 3 incident needs to consider if Legal Privilege is required. Where a HSW Manager/Project Lead believes this may be required, then this should be agreed with Engine HSW Lead before commencing the investigation.</p> <p>A <b>Local Investigation</b> is required:</p> <ul style="list-style-type: none"> <li>This investigation will require a <a href="#">flash report</a> within 48hrs.</li> <li>This investigation will involve a detailed Root Cause Analysis investigation and collation of evidence.</li> <li>The investigation will be team based, led by a lead investigator (nominated by the Engine HSW Lead), and the project team. Topic champion or experts should be consulted.</li> <li>It will be undertaken under the supervision of senior management or directors and will look for the immediate, underlying, and root causes.</li> <li>A Terms of Reference meeting shall be called no later than 48 hours after the incident. See <a href="#">Incident Investigation Terms of Reference and Closing Meeting template</a>.</li> <li>Root Cause Analysis report to be completed within 21 days of the event. Extension period to be sanctioned by Engine HSW Lead.</li> <li>Peer review: The investigation findings and learning shall be presented to their respective peers at the Engine HSWLT meeting. The requirements of a peer review and attendees will be determined by the Engine HSW Lead.</li> </ul>

**Table 5:** Levels of investigation

## 5. Incident Investigation

Potential Severity	YellowJacket Reference	Guidance	Investigation Levels
Level 4	Catastrophic	<p>Examples include:</p> <ul style="list-style-type: none"> <li>• Fatality.</li> <li>• Major structural collapse/loss of structure building i.e. fire.</li> <li>• Damage to Client or public property with significant damage/cost.</li> <li>• Negative international media coverage affecting company image.</li> <li>• Catastrophic, Irreversible environmental harm.</li> </ul>	<p>A Level 4 incident needs to consider if Legal Privilege is required. Where a HSW Manager/Project Lead believes this may be required, then this should be agreed with Engine HSW Lead before commencing the investigation.</p> <p>An <b>Independent Investigation</b> is required:</p> <ul style="list-style-type: none"> <li>• This investigation will require a <a href="#">flash report</a> within 48hrs.</li> <li>• This investigation will involve a detailed Root Cause Analysis investigation and collation of evidence.</li> <li>• The investigation will be team based, led by a lead investigator (nominated by the HSW Engine Lead), topic champion and the project team.</li> <li>• It will be undertaken under the supervision of senior management or directors and will look for the immediate, underlying, and root causes.</li> <li>• A Terms of Reference meeting shall be called no later than 48hrs after the incident. See <a href="#">Incident Investigation Terms of Reference and Closing Meeting template</a>.</li> <li>• Root Cause Analysis report to be completed within 21 days of the event. Extension period to be sanctioned by HSW Engine Lead.</li> <li>• Peer Review: The investigation findings and learning shall be presented to their respective peers at the HSW Board. The requirements of a peer review and attendees will be determined by the Engine HSW Lead.</li> </ul>

**Table 5:** Levels of investigation

# 5. Incident Investigation

## 5.2 Investigation objectives

The investigation process should achieve the following:

- The investigation should result in a realistic description of the events that have actually occurred
- The investigation should be evidence based i.e. not include opinion and be supported by auditable information such as [witness statements](#), inspection records, calibration logs, CCTV, drug and alcohol testing results, training records etc

- Incidents investigation need to collate evidence in a chronological manner for: pre-incident, the incident and post incident.
- A Root Cause Analysis (see Figure 2) of findings is required to establish Immediate, Underlying and Root causes based upon evidence gathered. **Note:** Root Cause Analysis is not required for Level 1 Incidents. For Level 2 incidents, this will be optional dependent on learning and the discretion of HSW Senior Business Partner/Regional QHSEW Manager (Operate). See the [Mace Root Cause Analysis Tool](#) (RCA) for more information.
- The findings shall be comprehensive so there is no confusion regarding what happened with no suspected gaps in the explanation.
- Where any supposition exists in the evidence or the report draws conclusion, this shall be made clear i.e. use language such as “Based on evidence”, “It is believed”. It should not use language such as “In my opinion”.

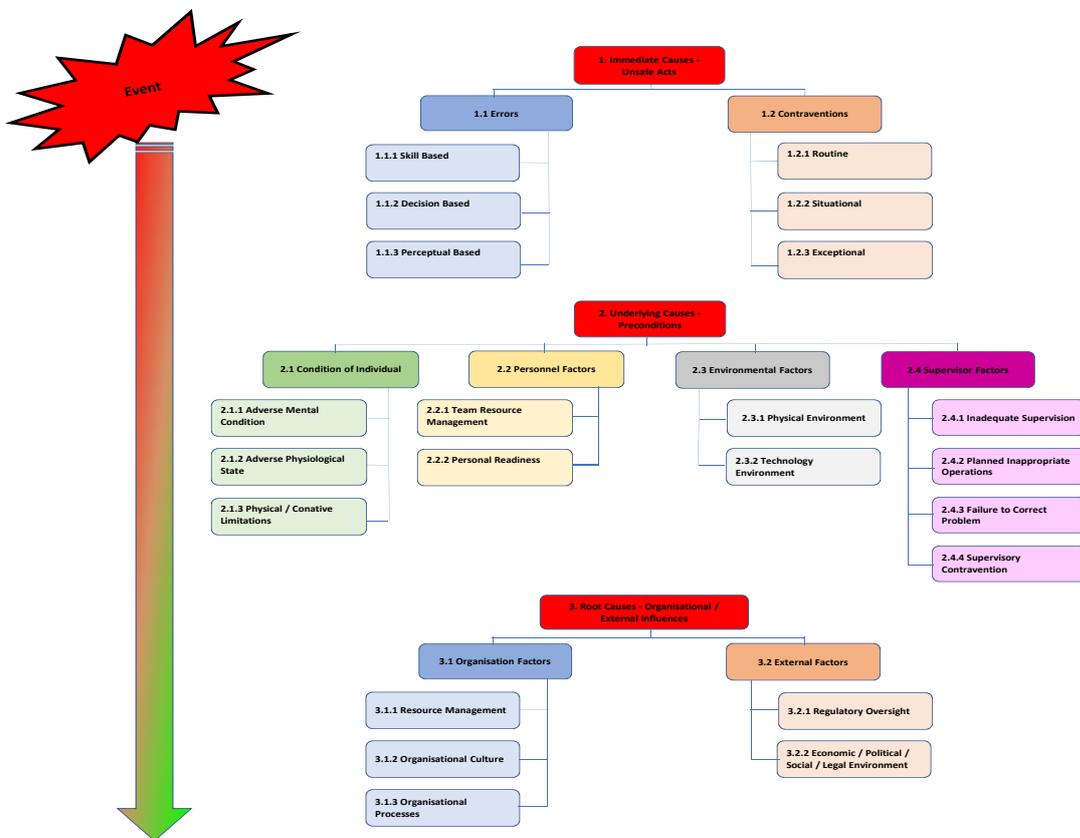


Figure 2: Root Cause Analysis (RCA) Model

## 5. Incident Investigation

### 5.3 Drug and alcohol testing

After an incident occurs, the Mace project team must consider if a drugs and alcohol test is required in line with the [Mace Drugs and Alcohol Policy](#).

### 5.4 Witness Statements

[Witness statements](#) are required to document the evidence of a person who may have information in relation to the incident i.e. the IP, a supervisor, individual who observed what happened. It must only include information which the individual saw and not opinion.

### 5.5 Interviews

A formal meeting with an IP or witness, usually following provision and review of a witness statement, to ask specific questions in order to ascertain and clarify any information about an incident that has occurred. The [Witness Interview form](#) should be used to record this.

### 5.6 Terms of reference

A terms of reference meeting must be called no later than 48 hours after the incident (Level 3 & 4 Incidents). The lead investigator and/or relevant Engine HSW Lead needs to liaise with legal and communications team as appropriate. Further contractor meetings may be required.

### 5.7 External communication

Where information regarding the incident needs to be communicated externally, including the [Client Incident Brief](#) then this needs to be in agreement with the Engine HSW Lead/Responsible Business Director, in discussion with the Mace communications and legal departments.

### 5.8 Incident investigation report

The lead investigator of Level 3 and 4 incidents is responsible for completion of the final investigation using the [Investigation Report Template](#).

The report/output should be easily understandable and free of unnecessary jargon.

The investigation report must identify all actions to prevent re-occurrence. Lead investigator is responsible for logging and allocating actions on Yellow Jacket. They must also verify that they have been implemented and are sufficient.

Each of the corrective and preventative action needs to be SMART.

- **Specific** – Objectives should specify what they want to achieve.
- **Measurable** – You should be able to measure whether you are meeting the objectives or not.
- **Achievable** - Are the objectives you set, achievable and attainable?
- **Realistic** – Can you realistically achieve the objectives with the resources you have?
- **Time** – When do you want to achieve the set objectives?

### 5.9 Disciplinary Policy

The operational lead is responsible for identifying any potential misconduct that warrants further investigation or action, in line with the Mace Disciplinary Policy.

# 6. Close out meeting, monitoring and review

## 6.1 Action closure and close out meeting

All incident levels must close out actions on YellowJacket. For Level 3 and 4 incidents an additional Close Out meeting is required. An agenda for this meeting can be found in the [Incident Investigation Terms of Reference and Close Out Meeting Template](#).

Final acceptance for the investigation is as follows:

- Investigation Level 1 – As assigned on YellowJacket and HSW Manager
- Investigation Level 2 – Project Lead & BU HSW Manager (Regional QHSEW Manager for Operate).
- Investigation Level 3 – Project Lead, Project Director, HSW Manager, BU HSW Lead, BU/Construction Director (Portfolio Director/Regional Operations Director for Operate) and HSW Senior Business Partner (Regional QHSEW Manager for Operate). **Note:** for Operate incidents, this includes the HSW Operate Lead.
- Investigation Level 4 – Level 3 attendees plus Engine COO, Engine HSW Lead and Managing Director.

## 6.2 Monitoring and review

Trends and findings from incidents are reviewed and reported through monthly reports at Engine levels.

Trends inform Mace's overall HSW strategy, specifically provision and effectiveness of training, targeted campaigns and audit focus areas.

Peer review of Level 3 and Level 4 incidents will be determined by the Engine HSW Lead.

## 6.3 Lessons Learned

### a) Safety Alert/Knowledge shares

During the process of investigating the incident the lead investigator, in coordination with the relevant Mace topic champion will review the need for the production of a Safety Alert/Knowledge share.

The lead investigator is responsible for assembling the information for the Safety Alert. For levels 1 and 2, the BU HSW Lead is responsible for verifying the content and final review prior to the alert being produced and briefed accordingly. For Levels 3 and 4, this will be the HSW Senior Business Partner.

### b) HSWMS Updates

Investigation findings relevant to our HSWMS or training will feed into ongoing continual improvement of our processes.

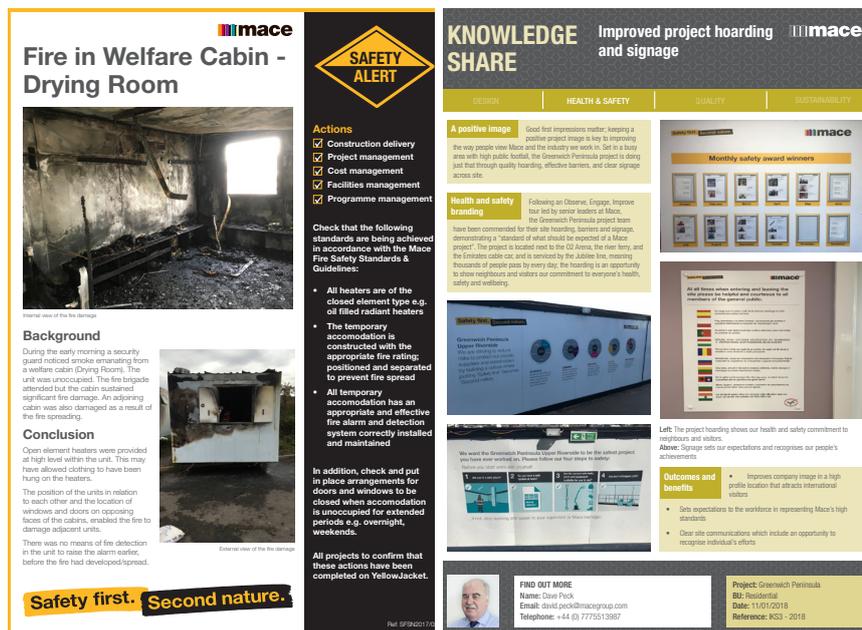
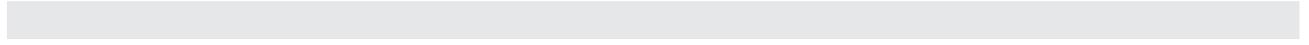


Figure 3: Examples of Safety Alert and Knowledge Share

## 7. Training and competency



Individuals involved in incident investigations must have training inline with Table 6 below

Roles	Training Required
Contractors	<ul style="list-style-type: none"> <li>Incident Investigation Course (Inhouse or External)</li> </ul>
Health, Safety and Wellbeing teams/ Responsible Business teams/ Authorised Person (First Alerts)/ Lead Investigator	<ul style="list-style-type: none"> <li>Mace Incident Investigation Process (Investigators Course)</li> </ul>
Business Unit Directors (or equivalent)	<ul style="list-style-type: none"> <li>Mace Incident Investigation Process (Senior Management Course)</li> </ul>
Investigation team	<ul style="list-style-type: none"> <li>Experience of being involved in previous investigations <b>OR</b></li> <li>Mace Incident Investigation Course (1 day) <b>OR</b></li> <li>Specialised/Technical expertise</li> </ul>

**Table 6:** Incident investigation training requirements

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[www.macegroup.com](http://www.macegroup.com)