Accident & Near-Miss Reporting Policy

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1. Purpose and commitment

Mogas Design Ltd is committed to preventing injury, ill health and damage arising from its activities. All accidents, near misses and unsafe events relevant to company work will be reported promptly, assessed proportionately, investigated where appropriate and used to improve controls. Reporting is encouraged without blame; deliberate misconduct is dealt with separately.

2. Scope and business arrangements

This policy applies to both directors and independent contractors engaged by Mogas Design Ltd, whether delivering design, review and engineering support remotely, working from home offices, travelling on company business, or attending client-operated gas sites and other premises. Mogas has no salaried employees at the date of issue. Independent contractors remain responsible for their own legal obligations and must comply with any client or principal contractor site rules. This policy does not override site emergency procedures.

3. Definitions

- Accident: an unplanned work-related event that results in injury, ill health or damage.
- Near miss: an unplanned event that did not cause harm but had the potential to do so.
- Dangerous occurrence: a specified event that may require statutory reporting under RIDDOR, even without injury.
- Hazard / unsafe condition: a situation with potential to cause harm, which should be reported and addressed before an incident occurs.

4. Responsibilities

- Directors: implement this policy; ensure suitable reporting channels; respond to incidents; liaise with clients and responsible dutyholders; determine whether Mogas has statutory reporting duties; maintain records and corrective-action tracking; review trends.
- Contractors: make the area safe where they can do so without risk, obtain emergency assistance, notify the appropriate site contact and a Mogas director promptly, cooperate with investigations and disclose relevant facts accurately.
- On client sites: follow site induction, permit-to-work, incident escalation and emergency arrangements. Cooperate with the site controller, principal contractor and employer/self-employed dutyholders to establish who must make any RIDDOR notification.

5. Immediate response and notification

- Stop work and withdraw to safety; do not expose others to danger. Call 999 for emergencies and follow the site emergency plan, including gas-release, fire or evacuation procedures.
- Provide first aid only if safe and within competence; secure/isolate equipment only when authorised. Do not interfere with evidence except to prevent further harm.
- Inform the site supervisor / client contact immediately where applicable and notify a Mogas director as soon as practicable, preferably on the day of the event. Serious events must be escalated immediately.
- Submit the company Accident / Near-Miss Report Form as soon as reasonably practicable, ideally within 24 hours, with date, time, location, persons involved, factual description, photographs where permitted, witnesses and immediate controls. Do not delay emergency or statutory notification while waiting for a completed form.

6. Recording and investigation

The director records each notified event in the Accident and Near-Miss Register and assigns a unique reference. The severity, potential consequences and recurrence risk determine the level of investigation. Investigations will identify immediate and underlying causes (including planning, training, supervision, equipment, access, travel and site interfaces) rather than focus solely on individual error.

Corrective actions must have a named owner, target date and evidence of completion. A director verifies their effectiveness and closes the incident record. Lessons learned and any revisions to risk assessments, working arrangements or contractor briefings are communicated to affected parties.

7. RIDDOR and other external reporting

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) require certain work-related deaths, specified injuries, over-seven-day incapacitations, occupational diseases and dangerous occurrences to be notified by the legally responsible person. Reporting is not required for every near miss or minor accident. A director will assess each potentially reportable event promptly against current HSE guidance and document the decision, responsible dutyholder, notification date and reference.

The responsible person may be an employer, certain self-employed persons or a person in control of the premises, depending on circumstances. For incidents at client gas sites, Mogas will coordinate with the client/site controller and relevant contractor without assuming that Mogas is automatically the RIDDOR reporting dutyholder. Where Mogas is the responsible person, it will submit the report through the HSE reporting system within statutory deadlines.

Broad deadlines: specified serious events must be notified without delay, with the report received within 10 days; over-seven-day incapacitation must be reported within 15 days of the incident; occupational disease must be reported as soon as the responsible person receives the relevant diagnosis. Record over-three-day incapacitations where applicable, even if not RIDDOR-reportable. Other notifications may be required under contracts, insurance terms or specific gas safety rules; these will be assessed separately.

8. Confidentiality and record retention

Records, including personal and health information, are restricted to authorised directors and people with a genuine need to know, stored in a controlled company digital folder with appropriate access and backup arrangements. Share only necessary information with clients, insurers,

regulators and contractors; use secure transfer. The director will apply applicable UK GDPR requirements and an appropriate retention schedule based on statutory, insurance and contractual obligations. Records for reportable events will be retained for at least the applicable statutory minimum, and longer where legitimately required.

9. Review, assurance and communication

The directors will review the incident register at least annually, including nil-return periods, and after any serious incident, repeated near miss, operational change or relevant legal update. The policy is issued to engaged contractors at onboarding or before relevant site activities. Compliance is assessed through incident closure, corrective actions and periodic review. Directors review and approve revisions.

10. Related documents and references

- Mogas Design Ltd – Health & Safety Policy; Generic Health & Safety Risk Assessment; Accident and Near-Miss Report Form; Accident and Near-Miss Register; contractor instructions and relevant site rules.
- HSE: www.hse.gov.uk/riddor/; www.hse.gov.uk/riddor/when-do-i-report.htm; www.hse.gov.uk/riddor/reporting/who-should-report.htm; www.hse.gov.uk/simple-health-safety/reporting-accidents-ill-health.htm

Director approval

Approved by	Mohammed Fasiuddin – Director
Signature	Signed copy held on file – available on request.
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