

## Incident Reporting & Investigation Policy

### JSPC Group LTD

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#### 1. Policy Statement

JSPC Group LTD is committed to ensuring that all accidents, incidents, near misses, and unsafe conditions are reported, recorded, investigated, and acted upon promptly and effectively.

We recognise that effective incident reporting is essential to preventing harm, learning lessons, and continually improving safety performance within the rail environment. In alignment with the requirements and expectations of **Network Rail** and **Iarnród Éireann**, JSPC Group LTD operates a robust incident reporting and investigation process as part of its Safety Management System (SMS).

All incidents must be reported immediately. There will be **no blame for genuine reporting**.

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#### 2. Scope

This policy applies to:

- All employees, directors, and agency workers of JSPC Group LTD
- All labour supplied on behalf of JSPC Group LTD
- All subcontractors where JSPC Group LTD has control or influence
- All work activities undertaken on Network Rail or Irish Rail infrastructure
- All locations including rail infrastructure, depots, offices, and client sites

Compliance with this policy is mandatory.

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#### 3. Legal, Standards, and Rail Industry Alignment

This policy is aligned with the following legislation, standards, and rail industry requirements:

##### United Kingdom – Network Rail Alignment

- **NR/L2/OHS/001 – Safety Management System**
  - Incident reporting, investigation, learning, and assurance

- **NR/L2/OHS/019 – Safety of People at Work**
- **NR/L2/OHS/003 – Fatigue Risk Management** (where fatigue is a contributory factor)
- Railway and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Network Rail Supplier Code of Conduct

#### **Ireland – Iarnród Éireann Alignment**

- **Iarnród Éireann Safety Management System (SMS)**
- Iarnród Éireann Rule Book
- Railway Safety Act 2005
- Safety, Health and Welfare at Work Act 2005
- Iarnród Éireann Incident Reporting and Investigation Requirements

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#### **4. Definitions**

- **Accident:** An unplanned event resulting in injury, ill health, or damage
- **Incident:** An unplanned event that causes or could cause harm or disruption
- **Near Miss:** An event that did not result in harm but had the potential to do so
- **Dangerous Occurrence:** A serious incident with the potential for significant harm
- **Environmental Incident:** Any unplanned event causing environmental harm

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#### **5. What Must Be Reported**

*(NR/L2/OHS/001 | IE SMS)*

The following must be reported immediately:

- Fatalities, injuries, and cases of ill health
- Near misses and unsafe acts or conditions
- Dangerous occurrences
- Environmental incidents or pollution events

- Property, plant, or infrastructure damage
  - Incidents involving the public
  - Any breach of Network Rail or Irish Rail rules
  - Any situation where safety was compromised
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## 6. Immediate Actions Following an Incident

Where an incident occurs, JSPC Group LTD will ensure that:

1. Work is stopped where necessary
2. The scene is made safe
3. First aid or emergency assistance is provided
4. Emergency services and rail authorities are contacted where required
5. The incident is reported immediately to management

Nothing will be disturbed unless required for safety or emergency purposes.

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## 7. Reporting Process

*(NR/L2/OHS/001 | IE SMS – Reporting)*

All incidents must be reported:

- **Immediately** to site supervision or management
- Using JSPC Group LTD reporting procedures
- In line with Network Rail or Irish Rail site-specific reporting requirements

Where required, JSPC Group LTD will notify:

- Network Rail or Iarnród Éireann
  - Principal Contractors or Clients
  - Enforcing authorities (e.g. HSE, HSA, ORR)
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## 8. Incident Investigation

*(NR/L2/OHS/001 – Investigation & Learning | IE SMS)*

JSPC Group LTD will investigate incidents to:

- Establish what happened
- Identify immediate, underlying, and root causes
- Determine contributory factors (including fatigue, competence, or supervision)
- Identify corrective and preventive actions

Investigations will be proportionate to the severity and potential risk of the incident.

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## 9. Learning and Corrective Actions

JSPC Group LTD will:

- Implement corrective actions promptly
- Track actions to completion
- Share lessons learned with workers and relevant stakeholders
- Update risk assessments, procedures, or training where required

Learning from incidents is a key requirement of **NR/L2/OHS/001** and Irish Rail SMS.

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## 10. Reporting to Authorities

*(ROGS | RIDDOR | Irish Safety Legislation)*

JSPC Group LTD will ensure that:

- RIDDOR reports are submitted where required (UK)
  - Incidents are reported to the Health and Safety Authority (HSA) in Ireland where required
  - Rail-specific reporting obligations to Network Rail or Irish Rail are met
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## 11. Records and Evidence

*(Network Rail & IE Assurance Requirements)*

Accurate records will be maintained for:

- Incident reports
- Investigation findings
- Corrective actions

- Communications with clients or authorities

Records will be retained in line with legal and contractual requirements and made available for audit.

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## 12. Roles and Responsibilities

### Directors and Senior Management

- Ensure effective incident management arrangements are in place
- Review serious incidents and trends
- Allocate resources for corrective actions

### Managers and Supervisors

- Ensure incidents are reported and investigated promptly
- Preserve evidence where required
- Communicate learning and corrective actions

### Employees and Workers

- Report incidents, near misses, and unsafe conditions immediately
  - Cooperate with investigations
  - Follow corrective actions and revised procedures
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## 13. No-Blame Reporting and Whistleblowing

JSPC Group LTD promotes a **just and fair reporting culture**.

- Individuals will not be penalised for reporting genuine incidents or near misses
  - Deliberate rule breaches or misconduct will be managed separately
  - Whistleblowing protections apply where appropriate
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## 14. Non-Compliance

Failure to comply with this policy may result in:

- Disciplinary action
- Removal from site

- Termination of subcontractor or labour supply arrangements
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## 15. Review and Continuous Improvement

This policy will be:

- Reviewed at least annually
  - Updated to reflect changes in **NR/L2 standards, Irish Rail SMS**, or legislation
  - Communicated to all relevant workers
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## 16. Approval

This Incident Reporting & Investigation Policy has been approved by the Directors of JSPC Group LTD and is effective immediately.

**Signed:**

Director

**JSPC Group LTD**

Date: J. Sands