

Millbank Holdings Group Ltd (Incorporating Priory Design Services Ltd, MDA Rail Ltd, Forbes HR Ltd)		
	<h2 style="color: #008080;">Accident, Incident and Emergency Response Planning (Millbank only)</h2>	HSSOP007/01/0419
		Last Reviewed: 04/2023
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		Owner: David Hopley

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Purpose:	<p>This document outlines the procedures that are to be adopted when any employee, visitor or contractor experiences an accident or dangerous occurrence on the company's premises.</p> <p>It is the policy of the Millbank Holdings Ltd to identify and investigate accidents, their source and hence their underlying causes.</p> <p>To enable this objective to be achieved it is imperative that all accidents, irrespective of the resulting injury or damage, be reported to the HR Dept in accordance to this procedure.</p> <p>This procedure is to ensure that all Millbank employees are aware of the requirement to report accidents/ incidents and close calls to the HR Manager.</p> <p>Additionally, this plan also describes how Millbank will respond to an emergency such as a major fire, flood, explosion or total crash of IT systems on its premises which has the capability to severely disrupt business.</p> <p>To tackle the challenges accident investigation demands management leadership, not least because of the need to be able to be able to balance apparently conflicting agendas within Millbank such as controlling liability while maximising safety learning, not to mention taking prompt remedial measures. And to enrich them and ensure that their lessons are taken on board, investigations need meaningful workforce involvement too. As with tackling any key challenge in business, people need to work together. You can only 'do safety' with people, not to them!</p>
Scope:	<p>This procedure applies to all employees regardless of service, contract or position.</p>

1. Risk Management

Good safety management depends on understanding safety risks and controlling them in an active and systematic way. When done effectively risk management should result in fewer accidents. However, when an undesired event does occur, the underlying causes should be thoroughly investigated to ensure that appropriate recommendations and actions are taken. Reviews of investigation findings should then ensure that lessons are learned and acted upon so as to make a similar event less likely and of lower consequence if it were to be repeated.

1.1 Safety Culture

Our commitment to the development of a 'positive' safety culture is fundamental to good accident investigation and continuous improvement. This should be reflected in employee and management attitudes towards safety, the frequency of key day-to-day safety behaviours.

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1.2 Cooperation

Good accident management and investigation is reliant on cooperation between those involved: employees, emergency services, public bodies and other relevant agencies. MDA Rail staff must not speak to the media or press and must liaise with Network Rail Media Support.

1.3 Investigation report

A good investigation report requires a good remit to make what is required very clear. The remit will include:

- the requirements and objectives of the investigation, the basic ones being:
 - to establish the events leading up to the accident
 - the immediate and underlying causes

The investigator shall, at the earliest opportunity after the accident or incident has occurred, consult all affected parties on an appropriate remit for the person appointed to lead the formal investigation.

The remit shall require:

- Determination of events leading up to the accident or incident, the immediate and underlying cause(s).
- Identification of recommendations that could mitigate or eliminate the risk from such accidents or incidents in future.

1.4 Witnesses

Witness statements are a vital source of investigations and the preparation for interviews to gain the best from output is therefore important.

HR Manager shall record physical and witness evidence of:

- a) The events leading up to the accident or incident.
- b) The immediate cause(s) of the accident or incident.
- c) The consequences of the accident or incident.
- d) Any identifiable underlying causes of the accident or incident.

2. Responsibility and Scope

2.1 Responsibility

- It is the responsibility of the HR Manager to ensure that all employees both understand and comply with this Procedure.
- It is the responsibility of the HR Manager to ensure that this procedure is updated to reflect identified changes resulting from the Company's review process.

3. Scope

This procedure applies to all employees regardless of service, contract or position.

4. Method

4.1 Responsibilities

The Managing Director has overall responsibility for health and safety and ensuring that all accidents are reported, investigated and recommendations acted upon.

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4.2 Employees

Employees should report all accidents/incidents, ensuring details of personal injuries are submitted to the HR Manager for entering into the Accident/Incident Register.

4.3 Formal investigations will give consideration to the following objectives:

- Establishing the full facts
- Determining the immediate and root causes
- Identification of any actions that would prevent recurrence
- Identification of any improvements in training, supervision, maintenance etc that would prevent recurrence

4.4 Records

Full records must be kept of any accident or incident involving loss, injury or damage.

4.5 Claims Handling

All Claims must be dealt with in writing to the HR Manager (Millbank House, Northway, Runcorn, Cheshire, WA7 2SX).

HR will liaise with the company Insurance brokers and organise an initial meeting to discuss the incident.

The HR Manager will act as the lead for all Claims and will co-ordinate all required meetings, interviews and legal representations until the claim has been settled.

5. Emergency Planning

5.1 Purpose

The purpose of this procedure is to enable the company to re-establish itself following a disaster or unexpected event and to regain its previous level of performance and status as quickly as possible.

This will be achieved by activating Millbank's Disaster Recovery Plan.

The main purposes of the plan are:

- To outline how Millbank can be continued in the event of a disaster occurring;
- To outline how Millbank can be re-built as quickly as possible without losing customer confidence and market share;
- To identify the key areas of the business which need to be safe guarded;
- To identify a select band of dependable key employees who will lead the recovery

5.2 Scope

The scope of the emergency plan covers major emergencies that have the potential to cause major consequences Millbank's business and reputation.

The emergency plan focuses on emergencies at a corporate level.

Major emergencies are classified as follows:

- Major accident at work site
- Employee fatality(s) or major injury(s)

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- Fire, explosion, flood at Millbank premises
- Serious environmental incident involving Millbank employees
- Total crash of IT systems involving full loss of information
- Natural disasters

6. Process

The plan will include the following areas:

- **Risk identification:** The risks associated with disaster / major / specified emergency will be identified and ranked in relation to acceptability. Risk controls will be drawn up based on the principle of 'as low as is reasonably practicable' (ALARP). The risk identification will establish which areas are most vulnerable to disaster as well as those that are absolutely vital to the survival of the company and its business.
- **Key sectors:** The plan will identify the areas regarded as being crucial parts of the business that need to be sustained at all costs.
- **Employees:** Define key employees and their responsibilities and how employees will be informed of what has happened and how it affects them.

7. Prevention and recovery plan for internal disasters (Fire, Flood, IT Crash)

Business Continuity

7.1 Purpose

The purpose of this plan is to describe how Millbank will respond to an emergency such as a major fire, flood, explosion or total crash of IT systems on its premises which has the capability to severely disrupt Business.

7.2 Procedure

Preventative procedures are in place at Millbank include: -

- Employee induction health and safety procedures
- Fire alarm linked to response control centre
- Smoke/heat detectors located in strategic places
- PAT testing every two years
- Break glass alarm points at all exits
- Monthly/annual inspection of premises
- Weekly fire alarm tests
- Regular smoke drills/evacuation exercise
- Smoking prohibited
- Intruder alarm linked to response control centre
- Security procedures established and in place
- Security Company in place to monitor building
- All paper records stored in steel filing cabinets
- Computer records backed up daily
- Relevant insurances to cover building, contents, computer equipment, business disruption arranged. Copies of insurance certificates held electronic and hard copy.
- Assets register maintained identifying all equipment.
- Crash of IT Systems, and Software contracted for same day response.

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7.3 Response Procedures

The Managing Director has overall responsibility for business continuity and will lead the response and instruct designated employees to take the following actions: -

- Inform or liaise with police, fire services, and ambulance services, take an inventory of stolen/damaged equipment and match up with serial numbers.
- Inform insurance company and follow instructions.
- Instruct building contractor to make safe or repair building.
- Where premises are uninhabitable temporary office to be set up.
- Raise purchase orders to replace stolen or damaged equipment.
- Instruct nominated IT suppliers to install computer equipment and network, load software and reinstate backed up information from back up discs.
- Organise Accident/Incident Investigation
- Access implications to clients and immediate impact on client's requirements and take action to inform, stabilise and rectify client situation.
- In the case of accidents/incidents which become reportable under RIDDOR report to HSE as per RIDDOR requirements.

8. Responsibility

8.1 Managing Director

It is the responsibility of the Managing Director to lead the response, participate in the simulation exercise and review procedures post emergency.

The managing director will be responsible for ensuring adequate resources are made available including financial to ensure preventive measures are actioned and that the response is appropriate and sufficient to deal with any emergency and minimise disruption to business and clients.

8.2 All Employees

Will provide full assistance and participation in Millbank's response to an emergency, Attend and participate at exercises when requested.

9. Bomb Alerts Procedure

9.1 Bomb Alert Instructions

If a bomb threat is received via telephone, obtain as much information as possible. Then contact a senior manager immediately who will then contact the police. Any decision to evacuate the premises will be taken by senior management in conjunction with the police. If an evacuation is necessary, the HR Manager or nominee will arrange for the alarm to be raised and the normal evacuation procedure will be followed. If any employee receives or notices a suspicious parcel, package etc they should immediately notify a senior manager, under no circumstances should the item be opened or investigated further. On investigation by a senior manager or on the instructions of a senior manager the police will be called and if evacuation is required follow the laid down evacuation procedure. On evacuation employees must not return to their place of work until advised it is safe to do so.

10. Lessons Learnt from Investigation

Incident prevention is strongly based on learning from previous incidents. When incidents occur they raise awareness and understanding of things that went wrong, and perhaps can go wrong again.

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The challenge is to learn as much as possible about the causes of accidents, incident, near misses and/or close calls that have already happened in order to prevent reoccurrence.

When experiences of previous incidents are translated into preventive measures, we can prevent incidents in the future and the need for repressive actions at that time.

A Lesson Learnt can:

- Be both good (“Worked Well”) or not so good (“Could be Improved”) experiences

A Lesson Learnt is not:

- An opportunity to ‘point fingers’, ‘brag’ or ‘lecture’

11. Related Documents

- SOP008 – Disaster Recovery Plan
- HSPOL001 - Health and Safety Policy Manual
- HSF002 - Accident/Incident Register
- HSF003 – Accident Incident Report Form – Millbank Only

12. Retention

Records are kept in line with our Data Protection Policy, Corporate Data Retention Policy (Appendix A Record and Retention) and Privacy Notice.

13. Change Management

Version	Date	Reason for Change