

# The cost of non-injury accidents

## Scoping study

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This scoping study explored the feasibility of different options for collecting the data required by the Health and Safety Executive for the calculation of the overall cost of workplace accidents.

The aim of the research was to undertake a small scale study of how information on non-injury accidents and associated costs are collected by businesses, and to examine the feasibility of different options for gathering information about the cost of non-injury accidents to businesses. The survey findings are qualitative and for illustrative purposes only.

Commonly reported barriers to collecting the information were time and resources. The findings show that many companies would not be interested in considering potential costs for anything that was less than their insurance excess. It was thought that the time resource required calculating information below this level of 'detail' was not considered cost effective.

Several interviewees reported there was a general problem of underreporting of near misses by staff and, therefore, thought that gathering information on non-injury accidents or anything not required under Health and Safety Law would be a problem. A further problem was the lack of an incentive that would justify the use of time and resources for collecting this type of information. Some incentives were suggested and could arise from perceived business benefits or compliance with regulations.

The study found that, dependent on businesses collecting data on non-injury accidents, there are several ways for HSE to collect that information, for example a large-scale survey, a case study approach or a pilot study.

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## EXECUTIVE SUMMARY

The Economic Analysis Unit (EAU) approached HSL for assistance in updating The Cost of Accidents at Work HS(G)96 and, specifically, in gathering information about the cost of non-injury accidents to industry.

After discussions with representatives of the EAU, it became apparent that designing and implementing a study to collect sufficiently detailed data on the number of non-injury accidents, costs of non-injury accidents and cost of damage to equipment for injury accidents would not necessarily provide the required information. This is because it was unclear whether organisations collected such data, how it was collected and, consequently, whether it could be reported to HSE. Therefore, it was proposed that a feasibility study would be carried out to determine the best approach to collect such data.

### Aims and Objectives

The aim of this study is to explore the feasibility of different options for collecting the data that are required by EAU for the calculation of the overall cost of accidents, and to identify a suitable methodology to collect this data from industry.

The feasibility of collecting the following data was considered:

- The number of non-injury accidents
- Costs of non-injury accidents
- Cost of damage to equipment for injury accidents
- Ratio of number of non-injury to injury accidents – to be calculated from information on injury and non-injury accidents.

### Summary of Findings

As representatives of only 14 businesses were interviewed, the findings should not be regarded as representative of the specific sectors or of businesses in general. The survey findings are qualitative and for illustrative purposes only.

Of the 14 companies represented in the interviews, five reported actively collecting and recording information on non-injury accidents. None of the companies were actively collecting and/ or compiling information on the cost of non-injury accidents. Despite companies not necessarily recording non-injury accidents, many representatives knew about the types of incidents affecting their company. The most commonly reported type of non-injury incidents reported involved ‘damage caused by moving, falling or flying objects’, for example, vehicle reversed into barrier or vehicle hit door.

The interviewees reported a number of barriers to collecting information on non-injury accidents; the most commonly reported barriers were time and resources. The findings show that many companies would not be interested in considering potential costs for anything that was less than the excess on their insurance claim; in many cases this excess was £500 or more. It was thought that the time resource required calculating information below this level of ‘detail’ was not considered cost effective.

Several interviewees also reported that there was a general problem of underreporting of near misses by staff in their organisation and, therefore, thought that getting information on non-injury accidents or anything that was not required under Health and Safety Law would be a problem. Another important problem, highlighted in the research, was the lack of an incentive that would justify the use of time and resources for collecting this type of information. Some incentives were suggested and could arise from perceived business benefits or compliance with regulations. However, the reasons behind collecting this sort of data are for HSE’s benefit to



provide information needed for impact assessments and press notices, rather than for significant business benefits.

## **Conclusions**

There are a number of possible methods to collect information on non-injury accidents and their associated costs that can be explored; this includes a pilot study, large-scale survey or case studies. One of the key criteria for identifying a suitable approach for data collection should be minimising the administrative burden on businesses by simplifying the data collection and reporting process. However, before any collection of information is attempted companies need assistance in understanding what information should be collected and how to do so.

# 1 INTRODUCTION

## 1.1 BACKGROUND TO THE STUDY

The Economic Analysis Unit (EAU) approached HSL for assistance in updating [The Cost of Accidents at Work HS\(G\)96](#) and, specifically, in gathering information about the cost of non-injury accidents to industry.

After discussions with representatives of the EAU, it became apparent that designing and implementing a study to collect sufficiently detailed data on the number of non-injury accidents, costs of non-injury accidents and cost of damage to equipment for injury accidents would not necessarily provide the required information. This is because it was unclear whether organisations collected such data, how it was collected and, consequently, whether it could be reported to HSE. Therefore, it was proposed that a feasibility study would be carried out to determine the best approach to collect such data.

## 1.2 AIMS AND OBJECTIVES OF STUDY

The aim of this study is to explore the feasibility of different options for collecting the data that are required by EAU for the calculation of the overall cost of accidents, and to identify a suitable methodology to collect this data from industry.

The feasibility of collecting the following data will be considered:

- The number of non-injury accidents
- Costs of non-injury accidents
- Cost of damage to equipment for injury accidents
- Ratio of number of non-injury to injury accidents – to be calculated from information on injury and non-injury accidents.

The objective of the work is to carry out a small feasibility study across a variety of sectors to discuss how information on non-injury accidents and associated costs are collected and, recognising that organisations may not be collecting this information, explore ways that they think this information *could* be collected. The results of the feasibility study will then be used to comment on the appropriateness and utility of various data collection methods for the purpose of meeting the needs of HSE.

## 2 METHOD

### 2.1 DEFINING NON-INJURY ACCIDENTS

The researchers, after consultations with the EAU, created a definition of a non-injury accident.

*“A non-injury accident is defined as any unplanned event that results in:*

- *Damage or loss to*
    - *Property*
    - *Plant*
    - *Materials*
    - *The environment*
  - *And/or a loss of business opportunity*
- But does not result in an injury”*

This definition was then used in conjunction with the [Labour Force Survey \(LFS\) definitions of the types of injury accidents](#) to create comparable definitions of the types of non-injury accidents and some appropriate examples. Table 1 below summarises the definitions and examples for each of the types of non-injury accidents, and also provides the LFS equivalent injury accident types:

**Table 1: Types of injury and non-injury accidents**

<b>Accident Definition (taken from the LFS)</b>	<b>Suggestions for Non-Injury Accident equivalent</b>	<b>Examples of Non-Injury Accidents</b>
Hit by moving, flying or falling object	Moving, flying or falling object causing damage to another object	e.g. truck not secured and rolled back into gate e.g. cupboard falling over and damaging office furniture
Injured handling, lifting or carrying	Object being handled, lifted or carried by an individual is damaged	e.g. stock being carried by an individual is dropped and damaged
Slipped, tripped or fell on the same level	An individual slips, trips or falls on the same level causing damage to something else but not themselves	e.g. individual walking through the office slips and knocks computer off the desk breaking it
Fell from height	An individual fell from a height above 2 metres causing damage but no injury	e.g. individual falls from scaffolding but their fall is broken by boxes of stock below
Physically assaulted by a person	Malicious damage which could have been prevented	e.g. JCB stolen and driven into building e.g. site not locked up properly and a storage container is tampered with causing spillage of product
Other kinds of accidents	Other kinds of non-injury accidents	e.g. ill fitted guard on cutting machine means worker cuts wrong material causing the machine to break down but no personal injury

## **2.2 SAMPLE**

### **2.2.1 Identification of participants**

Company representatives were identified who were happy to talk to us about their accident data and recording systems. This was done with the help of HSE Inspectors, Local Authority Health and Safety Inspectors, and other specialists. All the companies selected were ‘local’ to the researchers to minimise travel costs and time to conduct the interviews.

### **2.2.2 Data collection**

A series of 14 face-to-face interviews were conducted at companies of various sizes across a variety of sectors. The interviewees were individuals who could discuss the issue of collecting data on non-injury accidents at the relevant level in detail; usually this was a safety manager. On several occasions there were multiple interviewees present as they all had a significant contribution to make to the discussions.

**Table 2: Breakdown of interviews by sector and size**

Sector	Size of Organisations required		
	Small	Medium	Large
Construction	1	1	1
Manufacturing		3	1
Warehousing			2
Agriculture	1	1	
Services			2
Retail		1	

### **2.2.3 Interview schedule**

Interviewees were provided with a pre-interview sheet containing some of the key questions and issues that were covered in the interview; a copy of this can be found in Appendix A (Section 6.1).

In consultation with the HSE customer, a semi structured interview schedule was compiled. This was used as a prompt for the discussions that lasted approximately 60 minutes. A copy of the interview schedule can be found in Appendix A (Section 6.2).

The interviews were carried out by two HSL researchers, one acted as a facilitator to the discussions and the other made paper records to assist with note taking.

## **2.3 ANALYSIS OF TRANSCRIPTS**

The paper, interview notes were summarised and recorded electronically. The information was then analysed to identify themes and the key issues raised in response to the questions asked. These issues are summarised in the key findings of this report (see Section 3.)

### **3 SUMMARY OF FINDINGS**

As representatives of only 14 businesses were interviewed, the findings should not be regarded as representative of the specific sectors or, of businesses in general. The survey findings are qualitative and for illustrative purposes only.

Of the 14 companies represented in the interviews, five reported actively collecting and recording information on non-injury accidents. None of the companies were actively collecting and/ or compiling information on the cost of non-injury accidents.

The following sections summarise the discussions from the 14 interviews conducted.

#### **3.1 ACCIDENTS IN THE PAST 12 MONTHS**

At the beginning of each interview, the interviewees were asked how many injury and non-injury accidents there had been at the company in the past 12 months. The interviewees' responses are summarised in Table 3.

**Table 3: Number of injury and non-injury accidents in the last 12 months by company**

Company number	Sector	Number of Employees*	Number of accidents resulting in injury**	Number of non-injury accidents***
1	Construction	<i>250+</i>	51 (RIDDOR reportable)	33
2	Construction	<i>50-249</i>	3 (RIDDOR reportable)	-
3	Manufacturing	180	82 (2 RIDDOR reportable)	610
4	Manufacturing	230	42 (13 RIDDOR reportable)	-
5	Construction	10 (+ up to 30 contractors)	0 (RIDDOR reportable)	<i>Many (estimated)</i>
6	Manufacturing	300 (+ contractors)	82 (3 RIDDOR reportable)	540 near misses + 1 RIDDOR dangerous occurrence
7	Retail	<i>50-249</i>	194 (5 RIDDOR reportable)	-
8	Services	3000	<i>48-60 per year****</i> (All RIDDOR reportable)	****
9	Agriculture	200	5 (All RIDDOR reportable)	-
10	Warehousing	1000	126 (19 RIDDOR reportable)	-
11	Services	900	128 (17 RIDDOR reportable)	-
12	Manufacturing	200	27 (0 RIDDOR reportable)	-
13	Warehousing	300	123 (Unknown RIDDOR reportable)	29
14	Agriculture	5	2 (0 RIDDOR reportable)	<i>3 (estimated)</i>

*Notes:*

\* *Where numbers of employees are in italics the interviewee did not state the exact number of employees.*

\*\* *These injuries may not necessarily be reportable under RIDDOR unless stated*

\*\*\* *Unless a figure is stated the interviewee did not know the number of non-injury accidents. Where a figure is stated those given in italics are estimates.*

\*\*\*\* *The interviewee reported 8000 incident reports a year however it is believed that this included all types of report; injury, non-injury, near misses, hazards relating to staff AND patients. It has therefore been omitted.*

As can be seen from Table 3, many of the interviewees either gave estimates or could not report the number of non-injury accidents in the past 12 months. Therefore, ratios of injury to non-injury accidents could not be calculated from this data. However, Company 3 did independently report a ratio of eight non-injury accidents to every one-injury accident, which suggests that there may be many more non-injury accidents, than injury accidents occurring in industry.

Despite the interviewees not necessarily knowing precisely how many non-injury accidents their company had, many were aware of the types of non-injury accidents that were occurring. Tables 4 and 5, below, summarise interviewees' thoughts on the types of injury and non-injury accidents that had occurred in their company.

**Table 4: Main types of injury accidents in the last 12 months by company**

Company Number	Injury Accident					
	Hit by moving, flying or falling object	Injured handling, lifting or carrying	Slipped, tripped or fell on the same level	Fell from height	Physically assaulted by a person	Other kinds of accidents
1		√	√			
2						Cuts and bruises
3	√	√	√			
4			√			
5	<i>Company reported 0 accidents in the past year</i>					
6		√				
7	<i>The interviewee did not have this information</i>					
8					√	
9			√			
10	√	√	√	√		Cuts
11			√			
12		√				Cut finger
13	√	√	√			Cuts
14						Cuts

*NB: These are not wholly representative of the injury accidents at the organisations and were often recalled as areas where there have been incidents during the past 12 months.*

The main types of injury accidents reported at the interviewees' companies were slips, trips and falls; injury handling, lifting or carrying; and being hit by a moving, flying or falling object.



Only one interviewee reported incidents involving a fall from height and another reported physical assault by a person. The main types of ‘other’ injuries reported were cuts.

**Table 5: Main types of non-injury accidents in the last 12 months by company**

Company Number	Non-Injury Accident					
	Moving, flying or falling object causing damage to another object	Object being handled, lifted or carried by an individual is damaged	An individual slips, trips or falls on the same level causing damage to something else but not themselves	An individual fell from a height above 2 metres causing damage but no injury	Malicious damage which could have been prevented	Other kinds of non-injury accidents
1	√					
2	<i>The interviewee did not have this information</i>					
3	√					Equipment malfunction/ operation error
4	√					Equipment malfunction/ operation error
5	√	√	√			
6		√	√			
7	√	√				
8					√	Violence
9	√				√	Equipment malfunction/ operation error
10	√					
11			√			
12	√	√				
13	√	√			√	Road Traffic Accidents
14	√				√	

*NB: These were described as the areas where the company has the most non-injury accident problems during the past 12 month at the company, although they may not necessarily be from actual records reporting the type of incident reported.*

As can be seen in Table 5, nearly all the interviewees reported non-injury accidents that involved a moving, flying or falling object damaging another object; e.g. car driven into a petrol pump, vehicle reversed into barrier, vehicle hit door. None of the interviewees reported incidents where an individual fell from height and damaged an object but not an individual. The main type of 'other' non-injury accident was equipment malfunction/ operator error.

### **3.1.1 Comparison of types of injury and non-injury accidents**

The most commonly reported type of injury accident, with seven of the interviewees identifying it as an issue, related to slips, trips and falls; three of the companies identified the non-injury equivalent as being an issue. The most commonly reported type of non-injury incident, with 10 companies identifying it, related to moving, falling or flying objects whereas only three interviewees reported the injury equivalent type of incident. In the interviews, four of the representatives identified malicious damage as a non-injury issue. In comparison, only one of the interviewees identified the injury equivalent of violent assault as an issue.

A similar number of companies identified incidents that related to handling, lifting and carrying objects for both injury (six companies) and non-injury accidents (five companies). Whereas for both injury and non-injury accidents, incidents involving falls from height were not highlighted as an issue for the companies interviewed with only one of the companies identifying this as an issue for injury accidents and none for the non-injury equivalent.

### **3.1.2 Ratios of injury to non-injury accidents**

As previously stated in Section 3.1, interviewees either gave estimates or could not report the number of non-injury accidents in the past 12 months thus the information is not available to calculate the ratio of injury to non-injury accidents. However, Company 3 did, independently, report a ratio of eight non-injury accidents to every one-injury accident at their site. Ratios are of particular interest because they could be used to estimate the number of non-injury accidents for those organisations that only record injury accident data, and to build a picture of the financial cost across industry.

## **3.2 APPROACHES TO COLLECTING ACCIDENT DATA**

### **3.2.1 What information are companies currently collecting about incidents?**

The recording systems the companies use to keep records of incidents were discussed. This section summarises the methods of information collection for both injury and non-injury accidents as described by the interviewees.

#### **3.2.1.1 Injury accidents**

Many of the company representatives reported utilising a single reporting system for all types of incidents including accidents, dangerous occurrences and near misses. Some of those using an incident or accident form reported that they subsequently transferred this information onto a database system, so that it could be interrogated further although this was not always the case. Many interviewees said that some of these existing systems or methods could potentially be built upon to incorporate or include the collection of non-injury accident data, and in some cases possibly the associated costs.

### 3.2.1.2 Non-injury accidents

Of the company representatives interviewed, five reported that they were actively collecting and recording information on non-injury accidents. In addition, another company reported having the facility to do so but that it was not being utilised. Seven company representatives reported that they were not collecting any information and another reported there was a near miss form in place but that it was not working effectively. However, none of these companies were actively recording or collating information on the costs of these incidents, although one company did report that they had a facility to record costs on their incident form but that it was not being used.

Table 6 below summarises how companies interviewed are collecting information on non-injury accidents.

**Table 6: Information collection methods for non-injury accidents**

Information collection method	Number of interviewees			Total
	Size of organisation			
	Small	Medium	Large	
Not collecting any information	2	4	1	7
Incident form – including accident, dangerous occurrences, and near misses.	-	1	3	4
Database	-	1	3	4
Near miss form	-	1	2	3

*NB Companies may be collecting information on non-injury accidents in more than one way, e.g. Incident form and database, therefore the total column does not sum 14.*

Half of those interviewed were not collecting any information on non-injury accidents; they have no near miss or similar reporting system. Some of the other companies have one ‘incident form’ that incorporates accidents, dangerous occurrences and near misses; in some cases this may also include hazards and three of the interviewees reported that their companies have specific ‘Near miss forms’ to capture information on these types of incidents; although one of those reported that their form was not actually working as a method to collect information.

Of those that were collecting information on non-injury accidents, none were actively calculating the associated costs although several companies were in the process of investigating putting such a system in place. For example although company 13 reported they were not actively collecting information on cost they were able to report damage costs including racking damage, door damage and property damage.

### 3.2.2 What other information could be used to calculate the costs?

During the interviews, representatives were asked to consider if they currently collect information for other purposes that could be used alone, or combined, to offer an insight to non-injury accidents, and possibly their associated costs. Table 7 provides a summary of this information, by the size of organisation and Table 8, by sector.

**Table 7: Other relevant information being collected, by organisation size**

Other sources of information	Number of interviewees suggesting other sources of information			Total
	Size of organisation			
	Small	Medium	Large	
Purchase orders/ Invoices	1	4	3	8
Machinery/ Plant/ Mechanic Records e.g. downtime/ engineering/ maintenance records	-	4	2	6
Insurance claims	2	4	-	6
Changes to work plan/ schedule	-	1	1	2
Cost reports	-	-	2	2
Contract defects	-	1	-	1
Contractor records	-	1	-	1
Facilities Management records	-	1	-	1
Job files	1	-	-	1
Monthly reports	-	1	-	1
Site diary sheets	-	1	-	1
Waste budget	-	1	-	1

Table 7 shows that the most commonly reported source of information that could be used to collate information was purchase orders/ invoices; this was reported across all organisation sizes. The second most commonly reported source of information was machinery/ plant/ mechanic records; this includes information such as downtime or maintenance records e.g. for an oven in a manufacturing company. This type of record was reported in the medium and large organisations but not the small. In comparison both small and medium companies identified insurance claims as potential useful sources of information but large companies did not. It should be noted that the policy excess for small and medium companies varied from in the region of £500 to over £1000. For large companies insurance costs were not an appropriate means of assessing the costs of non-injury accidents because they could not claim against their insurance policies unless the incident resulted in significant costs to particular aspects of their business; their policies do not cover all aspects of their business.

While Table 7 shows that there are existing sources of information that could contain relevant information about incidents and related costs, the ease with which this information could be married up to specific incidents was not so clear. In addition, this information would only provide a partial view of non-injury accidents costs and would not identify the associated intangible costs.

**Table 8: Other relevant information being collected, by sector**

Other sources of information	Sector					
	Agriculture	Construction	Manufacturing	Retail	Services	Warehousing
Purchase orders/ Invoices	2	2	2	-	1	1
Machinery/ Plant/ Mechanic Records e.g. downtime/ engineering/ maintenance records	-	2	3	-	1	-
Insurance claims	2	2	1	1	-	-
Changes to work plan/ schedule	-	2	-	-	-	-
Cost reports	-	1	-	-	1	-
Contract defects	-	1	-	-	-	-
Contractor records	-	1	-	-	-	-
FM records	-	-	-	1	-	-
Job files	-	1	-	-	-	-
Monthly reports	-	1	-	-	-	-
Site diary sheets	-	1	-	-	-	-
Waste budget	-	-	-	1	-	-

As can be seen from Table 8, purchase orders / invoices were reported by representatives of all the sectors, and insurance claims were also reported in all sectors except services and warehousing.

There were a number of other sources of information that were reported specifically in the construction sector including contract defects, site diary sheets, monthly reports; however many of these were only reported by one of the construction sector interviewees. Both interviewees from the construction sector reported that another source of information would be changes to work plan or schedule, because these would include details about the reason for any delays or changes for justification purposes.

The interviewee from the retail sector also reported two other sources of information that none of the other interviewees identified, these were Facilities Management (FM) records and the waste budget.

### 3.2.3 How could companies collect the information?

The interviewees were asked to consider how they could, perhaps in the future, collect the information. The findings are summarised in Table 9, by organisation size, and in Table 10, by sector.

**Table 9: Summary of how the companies could collect information, by organisation size**

Other methods of collecting information	Number of interviewees that identified other methods of collecting information			Total
	Size of organisation			
	Small	Medium	Large	
Redesign relevant forms e.g. near miss, job completion sheet, job instruction sheet, site diary	1	1	2	4
Change in safety culture e.g. education and no blame	-	2	1	3
Gain access to other sources of potentially useful information e.g. Other department records (within the company), facilities management records	-	1	2	3
Dedicated/ Additional staff	-	1	1	2
Change in company policy	-	-	1	1
Create a form	-	1	-	1
Create accounts code for near miss related expenses	-	1	-	1
Create database for information	-	-	1	1
Facilities Management to record reason for calls logged	-	-	1	1

As can be seen in Table 9, a number of the respondents reported that they thought relevant forms within their company could be redesigned. This included not only the reporting forms, for example for near misses, but also other forms such as a site diary and a job completion sheet where it would be a practical, and perhaps more convenient, way of getting staff to record the required information.

However, several of the respondents thought that a change in safety culture was needed before this sort of information would be reported. The interviewees reported that even if a form was amended or a new one introduced, information would not be recorded reliably and consistently until there was a change in safety culture. It was noted that the introduction of a form might help to facilitate this change.

Some of the medium and large companies reported that they could collect information on non-injury accidents by exploiting the data sources identified in Table 7 and other sources that they did not currently have access to, e.g. other department records and Facilities Management records. Several of the interviewees felt that there was probably information already within the company about non-injury accidents and their associated costs but that they simply did not have access to it for one reason or another. Table 10 summarises this information by sector.

**Table 10: Summary of how companies could collect information, by sector**

Other methods of collecting information	Sector					
	Agriculture	Construction	Manufacturing	Retail	Services	Warehousing
Redesign relevant forms e.g. near miss, job completion sheet, job instruction sheet, site diary	-	2	-	-	1	1
Change in safety culture e.g. education and no blame	-	-	1	1	1	-
Gain access to other sources of potentially useful information e.g. Other department records (within the company), facilities management records	-	-	1	-	1	1
Dedicated/ Additional staff	-	2	-	-	-	-
Change in company policy	-	1	-	-	-	-
Create a form	-	-	1	-	-	-
Create accounts code for near miss related expenses	-	-	-	1	-	-
Create database for information	-	-	-	-	1	-
Facilities Management to record reason for calls logged	-	-	-	-	1	-

As can be seen in Table 10, interviewees in the construction, services and warehousing sectors all reported that they would need to redesign relevant forms to enable them to collect information on non-injury accidents. Some interviewees in manufacturing, retail and service sectors identified a need for a change in safety culture as an important factor, whilst interviewees in manufacturing, services and warehousing identified a need to gain access to other sources of potentially useful information.

Two of the interviewees in the construction sector identified dedicated or additional staff as an important factor to enable them to collect the information. In addition, one interviewee from the construction sector also identified a change in company policy as being needed to enable them to collect the information on non-injury accidents.

### 3.2.4 What barriers are there to collecting non-injury data?

The interviewees were then asked to discuss what they thought were the main barriers to their organisation collecting information on the cost of non-injury accidents both now and in the future. Many of the interviewees widened this discussion to collecting any information on non-injury accidents, as it was not possible to separate the issues. Table 11 below shows the number of organisations identifying each of the barriers as an issue.

**Table 11: Summary of the main barriers of collecting information on non-injury accidents and their associated costs by organisation size**

Barriers	Number of interviewees identifying barrier			Total
	Size of organisation			
	Small	Medium	Large	
Time	1	3	5	9
Getting the information	-	2	2	4
Resources	1	1	1	3
Lack of guidance/ help/ knowledge to create procedures or a clear system	-	1	1	2
Money	-	1	1	2
Paperwork	-	-	2	2
Lack of management interest	-	-	1	1
No barriers as there is a system in place	-	-	1	1
Culture	-	-	1	1
Need backing of Health and Safety Committee	-	1	-	1

All of the barriers to collecting information about non-injury accidents are equally attributable to the difficulties that companies experience when collecting cost information.

Table 11 shows that the most commonly reported barrier across all sizes of organisation is reported as being ‘time’, with nine of the 14 interviewees specifically identifying time as a problem. Linked to the problem of time is that of resources; three of the interviewees reported that they did not have the resource to collect this type of information.



Another commonly reported barrier is ‘getting the information’. Many of the interviewees discussed the problems they had encouraging staff to report near misses and several were aware of underreporting of accidents by staff. In addition, some thought that the lack of guidance in this area meant that they were unsure about what data should be collected and how to collect it.

### 3.2.5 Are there any incentives or benefits that would encourage the collection of non-injury and cost data?

Interviewees were asked to suggest any possible incentives to encourage companies to collect appropriate data; Table 12 summarises the findings.

**Table 12: Summary of incentives for collecting information on non-injury accidents and their associated costs, by organisation size**

Incentives	Number of interviewees identifying incentive			Total
	Size of organisation			
	Small	Medium	Large	
Pilot Study/ Scheme/ Grant e.g. via trade association	1	3	1	5
If the cost benefits can be demonstrated	-	1	3	4
If the Health and Safety benefits can be demonstrated	-	2	1	3
None e.g. Already collecting some information, Only would collect if it was a legal requirement	1	1	1	3
Assistance from HSE	1	-	-	1
Free accident reporting books	-	1	-	1
If the business development opportunities can be demonstrated e.g. ISO	-	1	-	1
Reduce HSE visits	-	1	-	1

The interviewees proposed a variety of incentive ideas but there was not a consensus of opinion. The ideas included a pilot scheme or study supported by a Government grant and a demonstration of the cost and or health and safety benefits. However, several interviewees reported that no incentives would encourage them to collect this sort of information; the only reason that they would or could justify the effort of doing so was if it was a legal requirement to do so.

Several of the interviewees also provided suggestions about incentive schemes for employees to report non-injury accidents such as including near miss reporting as part of the appraisal system. However, one interviewee reported such an incentive scheme had been removed because it had become overburdening.

## 4 DISCUSSION OF FINDINGS

The following section will discuss the key findings and give the researchers interpretations of them. Based upon this a number of suggestions and recommendations will be made about if and how information on the cost of non-injury accidents could be collected. However, it would be prudent at this point to highlight the risk of over interpreting the summary findings from this study. As representatives of only 14 businesses were interviewed, the findings should not be regarded as representative of the specific sectors or, of businesses in general. The survey findings are qualitative and for illustrative purposes only. The findings offer insight into the area of information collected on non-injury accidents and their associated costs, and are not conclusive.

### 4.1 KEY FINDINGS

Some of the companies interviewed are beginning to put systems in place to collect information on non-injury accidents, but none of them are actively collecting information on the associated costs. Those that are collecting information on non-injury accidents are doing so through an all encompassing incident reporting form or a near miss form, and some are then compiling the information in a database.

The most commonly reported types of information that is already being collected by the companies and *could* be used to obtain information on non-injury included:

- Purchase orders or invoices
- Machinery records including mechanical records
- Insurance claims

The interviewees also reported ways that they *could* collect information on non-injury accidents and the associated costs. These included:

- Redesigning relevant forms
- Changing the safety culture
- Gaining access to other sources of potentially useful information.

The interviewees reported many barriers to companies implementing systems to record information about non-injury accidents and associated costs. The three most commonly reported were:

- Time
- Resources
- Getting the information
- Lack of guidance/ help/ knowledge to create procedures or a clear system

When the interviewees were asked what incentives would encourage the company to collect information on non-injury accidents, they reported a number of possible solutions:

- A pilot study/ scheme and a Government Grant
- A demonstration of the costs and benefits
- A demonstration of the Health and Safety benefits
- Assistance from HSE

A number of the interviewees reported that there would be no incentives to encourage companies to collect this information and that it would only be done if it were a legal requirement to do so.

## **4.2 FACTORS FOR CONSIDERATION**

The interview findings highlighted a number of factors that may need to be considered before the suggested data collection methodologies can be assessed for suitability. These factors will be discussed in this section.

### **4.2.1 Definition of non-injury accident**

A fundamental issue is the need for a clear definition of a non-injury accident, together with the boundaries for inclusion of near misses, dangerous occurrences and hazards within the definition. The type of non-injury accidents also to be included needs to be considered, for example, in current research none of the companies reported a non-injury accident that involved a fall from above 2m however this does not necessarily mean it should be excluded from future research.

A second element of the definition relates to the costs to be included in any cost assessment. The guidance on how to run a cost study as part of the [HSE Ready Reckoner](#) currently states that companies could consider ignoring incidents that fit the following:

- Those costing less than a certain amount (say £10) or its equivalent in lost time
- Those where there was no risk to persons' health and safety (but be certain this is the case, as some have potential for harm).

The interview findings show that many companies would not be interested in considering potential costs for anything that was less than the excess on their insurance claim; in many cases this excess was £500 or more. Similarly, the time resource required calculating this level of 'detail' was not considered cost effective. When analysing the cost of non-injury accidents the HSE suggested £10 level may be too low, but it was not possible to ascertain what would be an acceptable level, merely that insurance claims and machinery records would be for higher cost incidents.

### **4.2.2 Levels of input required by organisation**

There are a number of different approaches to data collection that could be employed to gather industry data. The feasibility study has suggested that few companies are collecting information on the non-injury accidents and fewer still (none in this study) are collecting information on the associated costs. Therefore, one issue to take into consideration when evaluating the appropriateness of various data collection methods is the degree of (extra) effort required by organisations to collect and collate the information in the first place. A clear message in the interviews was that the time and resources required would be perceived as an extra burden, and therefore as a barrier to collecting this information, so must be taken into consideration.

Another important problem, highlighted in the research, was the lack of an incentive that would justify the use of time and resources for collecting this type of information. Some incentives were suggested and could arise from perceived business benefits or compliance with regulations (incentives are discussed further in Section 4.2.4). However, the reason HSE are interested in collecting these sorts of data is to be in a better position to provide the information needed for impact assessments and press releases, rather than for significant business benefits.

### **4.2.3 Barriers**

The main barriers identified by most of the company representatives who were interviewed were thought to be time and resource. Specifically, this included time and resource to set up or amend a recording system, to maintain it and to make best use of the information collected. It was thought that this could even require additional and/ or dedicated staff to achieve anything

meaningful. It was thought that there are a number of activities that would need to be considered. For example:

- Developing a suitable system for the company
  - Creating/ redesigning forms
  - Creating recording facilities
  - Creating database
- Putting system in place
- Training staff in using system
- Developing awareness of system within the company
- Periodical analysis of information
- Carrying out actions and review processes based on the data collected
- Translating the accident elements into costs

In addition, several of the interviewees stated that there was a general problem of underreporting of near misses by staff in their organisation and, therefore, thought that getting information on non-injury accidents or anything that was not required under Health and Safety Law would be a problem. A number of the interviewees reported that a change in safety culture and the introduction of a 'no blame' policy for reporting, for example equipment damage, would be required to enable a reporting system to work effectively.

#### **4.2.4 Incentives to organisations**

During the interviews, some of the interviewees suggested incentives that would possibly encourage or assist the companies in collecting the desired data. One of the most commonly reported incentives was a pilot scheme. It was suggested that companies could be given monetary assistance, for example to employ someone to carry out the work. Less costly suggestions included the provision of gifts such as accident books as 'rewards' for providing information. Currently, HSE are not intending to compel companies to collect the information, so thoughts about incentive schemes may be premature.

### **4.3 LARGE SCALE SURVEYS**

One method for collecting data about non-injury accidents is via a large-scale survey; the appropriateness of such an approach was something that the research team was asked to consider as part of the current project.

#### **4.3.1 Composition of a large scale survey**

If a large-scale survey is deemed to be the most appropriate or desired route to collating this information, then a number of factors need to be explored prior to such a survey being set up. For example, the following are just some factors that may need to be considered:

- Sample – Who to target?
  - Numbers
  - Who to target
  - Representative
  - Access to individuals
- Question set – What to include?
  - Number of questions
  - Areas questions cover
    - Number of incidents
    - Type of incidents
    - Cost of each incident – Is this needed? Or would the number of types of incidents be enough?

These issues will not be addressed in this report because it seems sensible and appropriate to make best use of existing surveys by extracting relevant information or building additional questions into the schedule. However, using any type of survey assumes that companies are already collecting and recording information on non-injury accidents and clearly this is an unreasonable assumption based on the results of the feasibility study.

### **4.3.2 Information about existing surveys**

A number of existing surveys were researched to assess their potential for collecting data on non-injury accidents and the associated costs. The following sections briefly describe the surveys and discuss their potential suitability as a future data source. It must be noted that any of these surveys would be subject to further investigation to confirm their suitability and to explore the technical implications (e.g. cost and time) of utilising such surveys; such issues were not within the remit of the current project.

#### **4.3.2.1 The Labour Force Survey (LFS)**

The Labour Force Survey (LFS) is a quarterly survey of private households in the UK. Various government departments include questions on the survey, which looks at respondents' personal circumstances and current labour market status.

HSE commissioned questions in the [LFS](#) are designed to gain a view of work-related illness and workplace injury based on individuals' perceptions. The HSE questions are run in the January to March quarter of the LFS each year. The findings from these surveys are used to inform HSE publications. However, the LFS reflects a sample of the population (1: 400).

In 2004/2005 of those surveyed, 1642 reported a workplace accident that did not result in an injury. As this question relating to the number of non-injury accidents in the past twelve months is already included in this survey, it could be used to obtain numbers of near misses/ non-injury accidents from employees but not the associated costs. However, the survey relies on the memory of the interviewees, and on them recalling any incidents where no injury occurred. Also, it would not be possible to obtain any costing information from these interviewees because only employers could provide this. The data obtained from the survey could be extrapolated if we understood the costs associated with particular types of incident that could be obtained by running a pilot survey.

It should be noted that the LFS question set is standardised, so further investigation is required to establish whether changes or additions to the question set in the HSE modules would be possible and if so, whether this is a feasible option.

#### **4.3.2.2 Annual Business Inquiry (ABI)**

The Office of National Statistics (ONS) carries out the [Annual Business Inquiry](#) in two parts, employment and financial information. Those calculating the cost of non-injury accidents would primarily be interested in the financial element (ABI/2) as it contains costing information on employment costs and purchases. The first part of the ABI is broken down by Standard Industrial Classification (SIC), however the financial element of the ABI only covers around two thirds of UK industry and, therefore, has a large gap in knowledge. Further investigation is needed to establish whether extra questions can be included but there are tight restrictions on making changes to the ABI survey, so it is unlikely to be a feasible option.

#### **4.3.2.3 Corporate Health and Safety Performance Indicator (CHaSPI)**

The [CHaSPI](#) is sponsored by HSE and is designed to give a measure of an organisation's health and safety performance. It is completed by organisations with more than 250 employees operating in any business, public or charity/ voluntary sector; organisations with less than 250 employees can complete the [Health and Safety Performance Indicator \(HaSPI\)](#).

After inspection of the CHaSPI question set, there are no specifically relevant items that could be used to inform the calculations on the cost of non-injury accident. The section relating to "Serious Incident Rating" has a list of serious incident types through which respondents report the number of incidents over the past three years, and this is broken down into serious or fatal injuries. However, the incident categories do not fit with the non-injury equivalent of injury accidents categories used in the current feasibility study. Crucially, the categories do not allow for an option that clearly identifies an incident where nobody was injured.

The HaSPI question set was also considered, but again incident categories do not fit with the non-injury equivalent of injury accident categories used in the current feasibility study. For example, one of the items relates to the number of accidents or incidents in the last two years including any minor or reportable incidents.

#### **4.3.2.4 Workplace Health And Safety Survey (WHASS)**

The [Workplace Health and Safety Survey \(WHASS\)](#) is a new programme of HSE sponsored large-scale surveys that provide estimates of health and safety outcomes; the telephone surveys were first run by HSE in 2005.

The WHASS question set for employers has a number of highly relevant questions that could be used to extract information; these are contained in the Work-Related Injury and Economics modules.

The questions that could be used as a source of information include:

- *"Do you keep records of NEAR MISSES that occur at work or in the course of work?"*
- *"During the last 12 months, how many were recorded?"*
- *"How many of these had the potential to cause death or serious injury, if any?"*
- *"Have you settled any claims under your employer liability insurance relating to this workplace in the last twelve months?"*
- *"How many were due to health and safety claims from workers?"*
- *"And how many were due to other claims?"*

NB: Questions on near misses are only asked about companies with 25 or more staff.

This survey seems to have several relevant questions that could be used immediately to get estimates of the number of non-injury accidents and a number of other claims. Relevant findings from the 2005 survey include:

- 63% of workplaces (with 25 or more employees) recorded near misses
- An estimated 22,700 near misses per 100,000 employed were reported

This is to become part of the FIT3 surveys, which may have questions that are suitable to collect information on non-injury accidents and their associated costs. These surveys collect information on awareness and behaviour regarding health and safety risks and support the HSE's FIT3 programme (Fit for work, fit for life, fit for tomorrow).

#### **4.3.2.5 Problems associated with using existing surveys**

There are a number of issues with utilising the existing surveys for the purposes of collecting data on non-injury incidents. Most importantly, while we have discussed making alterations, either changes or additional questions, to an established survey, it might not be possible to make changes at all. Assuming that it is possible to make changes, then cost becomes an issue. It is not clear how much it would cost to make alterations to any of the established surveys and this would need to be investigated as part of the methodology decision making process. A further issue would be who completes the surveys and how this would affect the accuracy of any findings; for example employees complete the LFS whereas the employers complete the ABI. This research did not reveal any further insight as to which of these may be a more accurate approach.

In addition, some of the surveys are subject to social desirability bias and although the effects are minimised and may not be so problematic when collecting non-injury accident data it still needs consideration. More importantly, businesses would need to establish a record of non-injury accidents to facilitate the accurate recall of data because recalling such incidents from memory is unlikely to do so.

#### **4.4 PILOT SCHEME**

To obtain accurate and representative findings by administering a large-scale survey there is a reliance on companies to be already collecting information on non-injury accidents. However, as has been shown in this feasibility study, the level at which this is being done varies greatly. Therefore, before a large-scale survey can be put in place work has to be done to increase the number of companies collecting relevant and sufficiently detailed information.

A suggestion to improve the number of companies recording detailed information on non-injury accidents, and if possible the associated costs, is to set up a pilot scheme, which could possibly include providing companies with some sort of financial incentive (e.g. a grant). A number of companies in this study suggested that they might be interested in taking part in a pilot study if there was financial support to do so from a relevant industry body.

To facilitate a pilot scheme, HSE would need to develop guidance material for the companies to give direction on what they should be collecting and how. One way to approach this could be to learn from the experiences of companies that have already implemented an effective reporting system. One of the companies, visited during the feasibility study, expressed an interest in sharing their system with others in a 'good neighbour' type scheme.

#### **4.5 CASE STUDY**

Another possible method for collecting information on non-injury accidents is to build upon the method used to produce data for HSG(96). The case study approach followed several companies that were mentored through the process of collecting information on accidents over a 12-month period. This approach could be utilised and expanded to include a near miss reporting system and promoting the reporting of incidents within the organisation. The companies would then be assisted in compiling the associated costing information to work out the cost of non-injury accidents within the company.

For the work to be meaningful the number of case studies would need to be increased and also, if possible, these would ideally be based on a representative sample of companies. This method

could then be further improved upon by offering some guidance, as outlined in Section 4.4, to the companies on what to collect and how to collect it.

However, it is recognised that this case study approach is labour intensive, time consuming and expensive to do well. As with the original work for HSG(96), a small sample of detailed, quality information will be collected but this will not be robust or anything more than indicative of costs across industry.



## 5 CONCLUSION

As representatives of only 14 businesses were interviewed, the findings should not be regarded as representative of the specific sectors or, of businesses in general. The survey findings are qualitative and for illustrative purposes only.

The findings show that concerns raised, during the initial discussions between the EAU and HSL about the possible difficulties of collecting information on non-injury accidents and their associated costs, were well founded. The feasibility study has shown that the available information varied greatly in its complexity and completeness between the 14 companies visited. Some of the companies interviewed were collecting a wealth of data on non-injury accidents whilst others were collecting nothing. None of the companies were collating complete information on the associated costs.

Obviously companies need to be recording and compiling information on non-injury accidents more consistently before any meaningful information can be collected from them by HSE. From the study it is apparent that companies want guidance on how to collect the information and associated costs. Any guidance on the collection of these data should focus on minimising the administrative burden on businesses by creating a simple data collection and reporting system. Many of the companies are interested in the Health and Safety benefits of implementing such a system; however there will be financial implications in terms of time and resource on employees to ensure the system is successful and demonstration of perceived business benefits (e.g. via impact assessment) or compliance with regulations could act as incentives to do this.

Any guidance provided by HSE would ideally help companies to understand the type of information they could collect and the ways in which it could be collected. This guidance would include clear definitions of what non-injury accidents are, the various types of incidents including examples and ideas of what costs could be recorded in relation to this. Any guidance created by HSE could then be piloted with willing companies to ensure the methodologies proposed were not too time consuming and over bearing.

Once it becomes clear that companies are recording data, then there are several ways for HSE to collect that information, for example a large-scale survey, a case study approach or a pilot study. All of which could involve a lengthy process and could be quite costly. In addition it would be necessary to survey considerably more businesses to be able to obtain a robust estimate than in the original survey where only 5 companies took part.

Whatever method is chosen to collect the information, the results can only ever provide an estimate of the cost to industry of non-injury accidents because there are some inherently intangible costs such as damage to company reputation that would be very difficult to include in the calculation.

## 6 APPENDIX A: INTERVIEW PLANNING

### 6.1 COPY OF PRE-INTERVIEW SHEET

#### The cost of non-injury accidents

Thank you for agreeing to take part in the interview.

- The research is being conducted by staff at the Health and Safety Laboratory (HSL), on behalf of the Health and Safety Executive (HSE).
- The purpose of the research is to investigate the feasibility of collecting data on non-injury accidents. These data are needed for building upon and re-estimating some of the estimates currently given in ‘The Cost of Accidents at Work’, HS(G)96. This will be further used in estimating the Costs to Britain of Health and Safety failures.
- During the interview we will discuss how information on non-injury accidents and associated costs is collected and, recognising that you may not be collecting this information, explore ways that you think this information *could* be collected.
- Please speak freely and honestly during the interview, as we are interested in your experiences and opinions. HSL is the research agency for HSE and has been commissioned to carry out the work behalf of HSE. The interviewers are researchers and are purely interested in you experiences, opinions and ideas – there are no right or wrong answers to the questions they will ask.
- Any information from these interviews that is used in project reports, academic papers and feedback will be presented anonymously; any personal or commercially sensitive material that could identify you or your company will be excluded.
- The interview will take approximately one hour. Prior to the interview it would be helpful if you would read the attached background information we have provided regarding the definition of non-injury accidents to familiarise yourself with the focus of the research.
- In addition, you might wish to consider your answers to the following questions (for discussion during the interview):
  - How many accidents have occurred in your organisation in the last 12 months?
  - How many non-injury accidents have occurred in your organisation in the last 12 months?
  - What procedures (if any) are in place for recording information on non-injury accidents? What mechanisms could be put in to record this information?

## **Accident Definitions for Non-Injury Accidents**

A **non-injury accident** is defined as any unplanned event that results in:

- damage or loss to
  - property
  - plant
  - materials
  - the environment
- and/or a loss of business opportunity

BUT does not result in an injury

Table 1 below gives definitions and examples for each of the types of non-injury accidents.

**Table 1: Definitions of non-injury accidents and examples**

<b>Definitions of Non-Injury Accidents</b>	<b>Examples of Non-Injury Accidents</b>
Moving, flying or falling object causing damage to another object	A truck is not secured and rolled back into gate A cupboard falling over and damaging office furniture
Object being handled, lifted or carried by an individual is damaged	Stock being carried by an individual is dropped and damaged
An individual slips, trips or falls on the same level causing damage to something else but not themselves	An individual walking through the office slips and knocks a computer off the desk breaking it
An individual fell from a height above 2 metres causing damage but no injury	An individual falls from scaffolding but their fall is broken by boxes of stock below
Malicious damage which could have been prevented	A site is not locked up properly and vandals tamper with a storage container causing spillage of product
Other kinds of non-injury accidents	An ill fitted guard on a cutting machine results in a machine break down but no personal injury

## 6.2 INTERVIEW SCHEDULE

### The cost of non-injury accidents

Thank you for agreeing to take part in this research.

Just to recap: The purpose of the research is to investigate the feasibility of collecting data on non-injury accidents. These data are needed for building upon and re-estimating some of the estimates currently given in ‘The Cost of Accidents at Work’, HS(G)96. This will be further used in estimating the Costs to Britain of Health and Safety failures.

The interview will take approximately one hour. During the interview please speak freely and honestly, as we are interested in your experiences and opinions.

Sarah and I will be taking notes as we go along.

Any information from these interviews that is used in project reports, academic papers and feedback will be presented anonymously and any personal or commercially sensitive material that could identify you or your company will be removed.

You may remember the sheet with the definition of a non-injury accident and examples we gave you prior to the interview.

Just to recap, the definition of a non-injury accident is:

*“...any unplanned event that results in:*

- *damage or loss to*
  - *property*
  - *plant*
  - *materials*
  - *the environment*
- *a loss of business opportunity*

*BUT does not result in an injury”*

## A. Numbers

You may remember we asked:

- How many reportable accidents have occurred in your organisation in the last 12 months? (*Probe – type of accidents to fit into LFS definitions*)
- How many non-injury accidents have occurred in your organisation in the last 12 months? (*Probe – type of accidents to fit into definitions on previous information sheets*)

## B. Information collected on non-injury accidents

- Does your organisation or service provider collect any information on non-injury accidents?

*Information collected specifically for this purpose?*

*Information collected but you not attributed to an accident, e.g., if you order new parts for damaged equipment is there a record of this? It's collected for other purposes but it comes about because there has been an accident.*

If Yes...

What information do you collect?

If No...

Why don't you collect any information?

Who collects this information? Who is involved in the process?

What are the barriers to you collecting information?

What other ways do you think you could collect information?

What ways could you collect information?

What other information do you have that you think could be useful?

Is there any information you have that you think could be useful?

*Examples of types of information*

- *Purchase orders (finance)*
- *Log sheets/ call logs (service providers)*
- *Health and Safety Officer (occurrences book)*
- *Machine reports of productivity (automated or by an individual)*
- *Work plans/ schedule, any changes*
- *Accident book*

- What would help you collect information on non-injury accidents?
- Is there a system you could envisage to collate information?

- What incentives would encourage you to collect such information and record it?

## C. Costs

- What would you say are the main costs of non-injury accidents in your organisation to both yourselves and service providers?
- Do you know how much non-injury accidents cost your company/service providers per year? (*Probe – type of accidents to fit into definitions on previous information sheets*)
- Do you collect any information on costs of non-injury accidents for you organisation?

If Yes...

What information do you collect?

Who collects this information? Who is involved in the process?

How are they measured?

What other information do you have that you think could be useful to calculate costs?

If No...

Why don't you collect any information?

What are the barriers to you collecting information?

What ways could you collect information?

Is there any information you have that you think could be useful to calculate costs?

## 7 APPENDIX B: INTERVIEW SUMMARIES

### 7.1 SUMMARY OF INTERVIEW 1

Reference: Interview 1

Date: 19<sup>th</sup> January 07

Context: Large sized Construction Company

Interviewee: Health and Safety Officer, and Project Manager

#### 7.1.1 Incidents in past 12 months

In the last 12 months Company 1 have had 51 reportable accidents; including over 3 day, slips trips and falls, and manual handling type accidents. The exact breakdown was not known.

In the same period Company 1 have records of 33 non-injury accidents including 21 dangerous occurrences and 12 near misses. However this number of non-injury accidents may be on the conservative side as it is predicted that the number of near misses are potentially higher as depending on site safety culture they may not all be reported whereas dangerous occurrences are a lot easier identified and reported.

#### 7.1.2 Sources of information collected specifically on non-injury accidents

There is information collected for dangerous occurrences and near misses at each of the project sites. When any incident occurs a senior manager on site will have to complete a form; this is the same for accidents, dangerous occurrences and near misses although there isn't a specific form for near misses. The information recorded on this form includes:

- *Date*
- *Name of Contractor*
- *Reportability*
- *Site*
- *Contract number and title*
- *Description of incident*
- *Type (e.g. dangerous occurrence, slip trip etc)*
- *Injury*
- *CSCS (construction skills certification scheme)*

This form is also used if a member of the public (MoP) is involved in an incident. The form is then sent to HQ where the information is entered into a spreadsheet (database).

The descriptions on the form look at what actually happened at the time of the event and also afterwards. They could go on further to look at other information such as any consequential events such as time loss etc. However this would mean more paperwork, time and resources that are all costly.

#### 7.1.3 Sources of information that could be used to collate information on non-injury accidents

Company 1 also have a variety of other information that could be used to estimate costs of non-injury accidents. This information is already collected:

- *Material and Plant orders*
  - Always recorded
  - When anything is written off the reason is recorded along with the cost.
  - It is possible that this is already totalled up, maybe for each job, but the interviewees were not sure.

- *Occurrences book*
  - Already record everything so could develop this further
- *Changes to Work plan/ Schedule*
  - Any changes to schedules, and the reasons, are reported back informally every two weeks and formally every month.
- *Detailed cost reports*
  - Done monthly for review
  - Including
    - Consumables
    - Plant
    - Labour

Details from contractors employed by Company 1 may not be that useful. Any problems with damaged plant etc tend to be dealt with in an informal way and are not officially recorded.

#### **7.1.4 Information collected specifically on the costs of non-injury accidents**

The interviewees don't really know how much non-injury accidents cost company 1 but it is thought that the main cost of non-injury accidents would be resources/ people as they could get held up waiting for new equipment etc. There is a general feel in the company for the cost of injuries. However, a surveyor could put costs to dangerous occurrences and near misses if someone asked them to. The time involved in working out the costs in these sorts of incidents would mean the lowest value/ cost of an incident of interest to the company would have to be reasonably high (say £200+). In addition management time is precious and time spent looking into non-injury accidents could mean that something else suffers so priorities have to be considered carefully and the question has to be asked- is it worth following up?

#### **7.1.5 How else could they collect the information?**

In an ideal world (cost etc aside) a policy in place would help to collect this information. The policy would need the backing of the senior management (which could be gained if they could see the cost benefits). In addition if they had assigned staff (an individual), either on site or in a group or in a region, with a structured way to look at the costs then this would help. At the moment project managers etc have enough to do already.

This sort of data would be beneficial to the company as the more a project makes the better for the company and the more incentive the workers get, e.g. they don't have anything on hire etc they don't need to.

A potential incentive could be a bonus scheme. This could be similar to the one in place currently at Company 1 whereby a % bonus scheme is in place on projects 15% of which is health and safety (over 3 day accidents etc).

#### **7.1.6 Main barriers**

The main barriers for Company 1 to collecting these sort of data and working out its associated costs are:

- Time
- Paperwork
- Resources
- Guidance/ Procedures from management



## **7.2 SUMMARY OF INTERVIEW 2**

Reference: Interview 2

Date: 19<sup>th</sup> January 07

Context: Medium sized Construction Company

Interviewee: Managing Director

### **7.2.1 Incidents in the past 12 months**

In the last 12 months Company 2 have had 3 reportable accidents (>3 days reportable accidents) and this is about average for them per month. The main types of injuries were cuts and bruises.

The number of non-injury accidents in same period was unknown as the company does not record this information.

### **7.2.2 Sources of information collected specifically on non-injury accidents**

Company 2 does not collect any information on non-injury accidents. If a dangerous practice is observed or an incident occurs then it is dealt with by managers on-site at the time. This is not recorded anywhere.

The information is not reported because staff are not required to report this information to the company. It's not recorded unless it is something that affects profitability.

### **7.2.3 Sources of information that could be used to collate information on non-injury accidents**

Company 2 has a variety of other information that could be used to collate information on non-injury accidents including costs. This information is already collected:

- *Site diary sheets*
  - Each site manager completes a daily diary about the work they are responsible for, e.g. work not completed that day and why.
  - This information could be used to work out costs and time lost. They mentally do this anyway.
- *Accident book*
  - A record of dangerous occurrences are sometimes kept but not as a matter of course and don't record near misses as such – will look at bigger issues / the more obvious safety concerns.
  - However, small-scale accidents aren't recorded and, anyway, they tend to be covered up by the perpetrator.
- *Plant mechanic records*
  - All information related to equipment damage. The records usually just say 'damaged' but, sometimes, particular things are flagged up and recorded separately but this is not routinely done.
  - For example, if a particular person was known to have damaged more than one piece of equipment, or was involved in a number of dangerous occurrences, then this would be noted.
- *Insurance claims* (but this is only for claims over £1000 because of the excess)

- The information on these claims are recorded as a matter of course because costs over £1000 are of interest to the company. Other costs are absorbed in normal running costs.
- They may also record information if damage is significant in some other way
- *Materials and invoices*
  - Could also give information but this would need to be manually extracted and collated, and would be time consuming.
- *Changes to work plan*
  - They have regular meetings with clients to keep them informed of progress and would inform them of any delays. However, accidents of any kind have never been a cause of a delay to a client.
- *MD monthly report*
  - Detailing how each job is performing
  - But this does not include a detailed breakdown of the underlying costs – this would be too much detail and it's not needed. It would take too much effort to calculate this and to read through, compared to the benefit it could have.
- *Contract defects*
  - Are also recorded for snagging/ defects lists, these tend to be quality/workmanship issues but could also be damage issues. They are not currently separated out on the lists.

#### **7.2.4 Information collected specifically on the costs of non-injury accidents**

No information on the costs of non-injury accidents is collected.

The MD would be interested in the information on non-injury accidents, from a business point of view. However, he believes is doing all he can to work towards preventing reportable accidents and therefore to preventing non-injury accidents. Also, it is difficult to see how to improve the causes of these accidents and therefore, collecting data about them is not a priority.

He would suggest that vandalism is probably the biggest non-injury cost to company.

The costs that are known in relation to injury accidents are:

- Time off for an injury accident
- Any claim/ compensation information
- Sickness pay
- Lost time

The costs associated with collating information about non-injury accidents would be far more costly than the accidents themselves. They would probably need to employ an extra person to do this – just doesn't see the benefit.

#### **7.2.5 How else could they collect the information?**

Company 2 suggests that they could re-design the site diary pad by adding an extra box relating to non-injury accidents, the associated costs and reasons.

However, this would require the education of managers and staff to record the information. But it could be easy to collect this if the manager was routinely made aware of any occurrences but currently this does not happen as they may be covered up.

Also Surveyors could collate the paperwork but this would require extra work and the company were not willing to ask these staff to do extra work. If they has the admin staff to dedicate their time to this they could go through the diary returns and collate the information but this would take a couple of hours and would any bring small benefit in return.

Also incentives could help. For example:

- Some sort of Scheme or grants via Business Link or the Federation of Master Builders
  - For example, a pilot trial where companies would be given a grant for 12 months to record this information and send it to HSE.
- If it could be portrayed as a business development idea it might be useful (ISO)
  - E.g. If they could identify other use for this data for businesses – continuous improved and cost savings.

### **7.2.6 Main barriers**

The main barriers for Company 2 are:

- Time
- Money
- Resources

## **7.3 SUMMARY OF INTERVIEW 3**

Reference: Interview 3

Date: 23<sup>rd</sup> January 2007

Context: Medium sized Manufacturing Company

Interviewee: Health and Safety Officer, Safety Technician and Costing Analyst

### **7.3.1 Incidents in the past 12 months**

Company 3 in the past 12 months had 2 reportable accidents, and a total of 82 accidents.

In the same period, Company 3 had 610 near misses:

- 25 Struck against
- 8 Manual Handling
- 5 Slip/Trip
- 67 Fall from height

Of these 4 were non-injury property losses:

- Vehicle reversed into barrier
- Vehicle drove over supply cable and damaged it
- Smoke detected
- Fire in oven

There should be a ratio of 8 near misses to every 1 accident. There were also 3 road traffic accidents (RTAs) in the same period.

NB: Production didn't start properly on the site until March 06.

### **7.3.2 Sources of information collected specifically on non-injury accidents**

Company 3 has accident and near misses forms (to include hazards) that are used to report everything and this is then added to a database word for word so it can be broken down and looked at in many ways (daily reports, weekly reports, near miss reports, property/ process loss reports etc). Both forms are in the form of a copybook. The amount of information recorded on the form depends on the severity of the incident; however there will be an interview with the individual as the result of a form being completed.

For accidents the form has two parts. There is the front page that is green and is to be sent to H&S and the white part that opens out into a booklet to include all the information on the incident including photos etc, and the action plan. The severity rating on an accident form has to be completed within 24 hours.

For near misses the form has three pages (parts). The first part is the green page that is completed by the individual reporting the near miss and is sent to H&S. This includes information such as who the individuals are, what they saw and what could have happened, and what (if any) remedial actions have been taken to remove the immediate danger. The second part is the white page that is to be completed by the manager who looks at the condition and gives it a rating and works out the corrective actions. The third part is the pink part and this is to be returned to the employee after the other stages have been completed to complete the feedback loop so the individual knows what has been done about the issue.

At different sites of the larger organisation senior managers decide whether or no they wish to see all the near misses that come in, at Company 3 the senior manager sees all the reports.

Employees are given targets as part of their employee risk protection (ERP) programme to report a certain number of near misses each year as part of their performance (previous to this Company 3 were using ISRS). Approximately 60% of staff report near misses at Company 3. This is a way to ensure the gets the information, however there is possibly over-reporting as they encourage reporting everything including paper cuts.

There are also boards for both accidents and near misses that give information on a 4-week period and the number of incidents that have occurred with any appropriate trending analysis etc. For an average 4-week period there are 70 near misses reported.

In addition Company 3 also is part of a system whereby high potential incidents, that is high potential to cause damage to the business, are cascaded across the wider organisation. The information will be emailed out across the sites to include the immediate and basic causes, and what has now been put in place as a result of the incident. This shares good practice across the sites.

### **7.3.3 Sources of information that could be used to collate information on non-injury accidents**

In addition to the detailed information Company 3 is already collecting on non-injury accidents, the following sources could also be utilised:

- Machinery downtime/ Efficiency of line
  - Not captured in H&S
  - BUT if a machine was locked off then this would be recorded on the central engineering management system. A downtime code would be applied and this could be identified back as the relevant code to “operator error” but to get further information on the system to explain this further would be very time consuming. This also wouldn’t necessarily link back to safety reports.
- Purchase orders
  - At other parts of the organisation, e.g. for haulage, that would be a lot easier to quantify.

### **7.3.4 Information collected specifically on the costs of non-injury accidents**

At present there is no costing of non-injury accidents, as it is an evolving site, although the company would probably be interested in them. Other sites of the organisation would probably have more information and data on non-injuries to be able to work out costs from, and these sites would probably be interested in repeat type events but it would have to be for a substantial amount of money. Costs are worked out only when incident is RIDDOR or goes into lost time approximately £200 per day. At other sites there are special groups e.g. looking at accidents involving pallet trucks and working out the costs of lots of NM being reported. However the database has facilities to record costs very easily if they are known e.g. tail light £25.

The main costs of non-injury accidents at Company 3 would probably be:

- *Lost production and it’s associated costs*
  - E.g. fire in an oven due to lack of knowledge concerning maintenance of machinery, now having to clean the oven 2 hours out of every 12 hours.
- Damage caused by pallet trucks
  - E.g. to doors etc – sometimes hard to work out what’s happened especially if contractors working in the same area.

Company 3 is currently setting up a way to track costs of damage to kit in logistics. They have set up the project with a budget of £0 and can therefore track any spends. They will also look at production related costs if relevant.

## 7.4 SUMMARY OF INTERVIEW 4

Reference: Interview 4

Date: 23<sup>rd</sup> January 07

Context: Medium sized Manufacturing Company

Interviewee: Health and Safety Officer

### 7.4.1 Incidents in the past 12 months

In the past 12 months there have been 13 reportable accidents, with the majority of these being slips, trips and falls despite recent training programmes into this area.

There is a good robust procedure in place for recording accidents at Company 4.

An accident is recorded:

- a) *In the accident book*
- b) *On the accident form*
  - Injured person/ first aider completes
  - Passed onto the shift manager
- c) *Investigation occurs*
- d) *Actions are set*
- e) *Accident investigation review*

Company 4 is not sure how many non-injury accidents there have been in the past 12 months as they do not collect this information at present.

### 7.4.2 Sources of information collected specifically on non-injury accidents

At the moment nothing is collected on non-injury accidents. However there is an action, as part of the annual safety plan in the company, to bring in a system of reporting non-injury accidents in June 2007.

There is currently no form for reporting near misses and these tend to be discussed informally in everyday work but they are not recorded anywhere. There are also daily meetings at present where if a manager feels it is appropriate they can raise any incidents or where any issues are discussed.

Sources of information that could be used to collate information on non-injury accidents

There are several sources of information that are collated that could be explored further to try and be utilised to estimate costs:

- *Machinery fixes*
  - Engineering will keep paper records of anything they had to fix etc, however any parts ordered on purchase orders would probably not be matched up easily as the reason for order may not be recorded
  - Other downtime of any machinery would also be recorded in other places
- *Production feedback facility*
  - Information may be collected through this electronically in the form of a short narrative BUT it may only have a downtime code with not much information to take it further forward.
- *Insurance claims*
  - All personal injury claims have details of the incidents.

### **7.4.3 Information collected specifically on the costs of non-injury accidents**

Despite no information being recorded on non-injury accidents, it is thought that probably the main costs of non-injury accidents are:

- Damage caused by or to a forklift.
- Production downtime
- Parts on a machine not being fitted properly.
- Pallets/ Paper reels falling over

However, none of these might be recorded at present. No costs are reported for reportable accidents either.

Company 4 are not sure what threshold they would set as a minimum cost. It could be that only relatively costly incidents are investigated due to the level of investigation. Or they may be interested in all incidents including the low cost incidents, as the potential severity to individual could be high.

### **7.4.4 How else could they collect the information?**

Trying to put a form in place for shift managers etc to do BUT they don't want anything to onerous. Whatever system is put in place it needs to be streamline and user friendly/ easy to use nor does it need to be a lot of work for the managers. Also it needs to be followed through full circle. This has perhaps not happen with the hazard reporting form and the problems from trying to implement this need to be taken on board.

Hazard ("an accident waiting to happen" but isn't a near miss) forms were previously very ad-hoc and are now very difficult to get completed as there is still blame culture and individuals question 'should I have done that?'. They are also viewed inherently differently, as 9 out of 10 accidents need treatment. Company 4 is going through a long culture change and they are trying to address these issues.

At present they are suggesting a simple one page A4 document to be completed and a simple user-friendly access database to enter the information.

Company 4 could also look at the downtime for a month and look at the top 5 causes. The problem is that looking at any such information and working out the associated costs can in itself be costly.

Incentives for Company 4 to collect this sort of information:

- Reduce accident rates
  - Then ultimately reduce any liability claims and therefore keep insurance costs
- HSE pilot study to help/ assist with the process
- Working group with other sites to share knowledge.
  - E.g. Confederation of paper industries corrugated sector health and safety committee.
  - Share good and bad examples
  - Share common issues and discuss potential solutions.

But ultimately if there was a fixed and set time scale then something would be put in place but there would be a lot to do.



#### **7.4.5 Main barriers**

- Knowing what to do/ system to put in place.
- Time
- Concerns about what to implement.

## **7.5 SUMMARY OF INTERVIEW 5**

Reference: Interview 5

Date: 25<sup>th</sup> January 07

Context: Small sized Construction Company (n=10 permanent staff + up to 30 contractors)

Interviewee: Company Director and Health & Safety Training Manager

### **7.5.1 Incidents in past 12 months**

In the last 12 months Company 5 have had 0 reportable accidents

They have no records regarding the number of non-injury accidents.

As an estimate they say that 5-10% of materials are wasted through damage to materials etc, which could give an indication of the non-injury accidents they have.

### **7.5.2 Sources of information that could be used to collate information on non-injury accidents**

**Job files** – each job has a file to ensure invoices relating to new equipment or materials e.g. replacement of glass if a conservatory window was accidentally broken, but the file would not contain details about why such an order had been placed. The costs would just be recorded as part of the job.

Each job is given a job instruction sheet and a job number and then a list of materials, the labour and plant needed is developed (referred to as MPR – i.e. the identification of management, processes and resources). The HSE Risk Assessment is then done and attached to the job number.

Job information goes to the site warehouse where the operatives collect the information on what is required. The purchasing manager orders the materials under that job number. They record the materials required and add 5% contingency to allow for damage and waste.

#### **Jobs not completed on time**

If jobs are not completed on time then the MD wants to know why but he does not actually record this information. Delays are usually due to faulty equipment being provided by the hire company, which can result in lost working days. This is accepted as a business cost and rolled into the 5% contingency.

#### **Insurance claims**

Currently has a £500 excess on insurance policy, however had never had to make a claim. Damage and losses below this amount are accepted as part of the company running costs.

### **7.5.3 How else could they collect the information?**

#### **Completion sheet**

The staff are required to ask clients to fill out a 'Completion Sheet' once a job has been finished (example provided). The sheet asks the client a series of questions such as:

- Has the site been left clean and tidy?
- Has the job been completed on time?
- Any issues regarding the reliability of staff?
- Any health and safety issues whilst work has been undertaken?
- Etc.

The client then signs the form and the staff bring it back to the office. It was suggested that additional questions could be put on the form to ask what materials were used on site, what breakages, accidents there have been etc.

However, the MD thought this was unrealistic because it was difficult to get the basic information from the staff already and putting extra questions on the form would reduce the likelihood of it being completed.

#### **Job instruction/ complaint sheet**

Questions could be added to the job instruction sheet.

#### **7.5.4 Main barriers**

Resources – they could record information but would need to employ another person (£20K) and this is not cost effective.

#### **7.5.5 Incentives**

Assistance from HSE in setting up a system.

Grant to assist in a trial to collect the data (£7K-10K)

#### **7.5.6 Interest?**

Would be interested in knowing the cost of wastage/ non-injury accidents to the company.

In addition, information on recycling information of material would be useful, i.e. re-using equipment/ materials, selling materials (such as lead) and marketing regarding recycling.

## **7.6 SUMMARY OF INTERVIEW 6**

Reference: Interview 6

Date: 26<sup>th</sup> January 07

Context: Large sized Manufacturing Company

Interviewee: Safety and Environmental Officer

### **7.6.1 Incidents in the past 12 months**

Over the past 12 months Company 6 have had 3 RIDDOR reportable accidents and 1 RIDDOR reportable dangerous occurrence. At Company 6 they also have their own medical reportable incidents that may have not been a RIDDOR reportable incident but where an individual received some medical treatment more than first aid, and in the past 12 months there have been 6. In total at Company 6 there have been 82 accidents in the past 12 months, the majority of which have been manual handling related.

There have been 540 near misses reported in the same 12-month period, the majority of which were slips, trips or falls or manual handling related incidents; in terms of LFS related equivalent non-injury incidents.

### **7.6.2 Sources of information collected specifically on non-injury accidents**

The near miss reporting system, in place across all the sites in the company, consists of a transfer book type form with three sheets:

- White sheet – this is passed onto the line manager.
- Red sheet – this is put in the near miss post box and collected by Safety and Environment every morning and discussed at the morning meeting.
- Blue sheet – this is kept by the individual reporting the incident.

On these forms information such as location and description of the incident are recorded. Also the line manager or team leader has to record any immediate corrective action and feed this back within 24 hours.

Every incident is recorded, down to a paper cut. Near misses are rated A, B, or C, with A rated incidents requiring immediate action. 80% of the near misses are something someone's done and therefore need engineering to fix so they have to spend money to put them right. Previously used an incentive scheme for reporting near misses but this has been removed now as they were getting over 1500 near misses and the majority of these were engineering so this was just too overwhelming.

The safety reps support this system in place and they have actively promoted it. As a result of which it has become embedded in the site and everyone reports near misses including managers, office staff as well as the operators. However, this has then been used as supporting evidence in the case of civil claims.

There is another type of incentive scheme running in parallel to the near miss recording that rewards a site when they have x working hours without their own medical reportable incident occurring, e.g. 250000 person working hours. This could potentially have a detrimental impact on the system but does not seem to have had so as yet and Company 6 received one of these awards at their site only the day before the interview.

### **7.6.3 Information collected specifically on the costs of non-injury accidents**

Costing is occasionally done against how much near misses cost. This can be done by looking at the spending on the engineering safety budget to replace/ repair items relating to near misses. However, Company 6 find it more difficult to quantify human time in near miss correction but the Safety and Environment Manager estimates that they have ½ year person time on the near miss process alone.

Company 6 are confident that they can crudely predict how much the near miss process costs as they know the people that are involved:

- Engineers – budget and people to action
- Senior Management

*NOTE: More than happy to share this system with others and discuss. They already submit the information to the paper federation and a league table is produced.*

## **7.7 SUMMARY OF INTERVIEW 7**

Reference: Interview 7

Date: 7<sup>th</sup> February 07

Context: Medium sized front line retail store

Interviewee: Profit Improvement Manager

### **7.7.1 Incidents in the past 12 months**

Company 7 have a log system with all RIDDORS. This records; date, time, location, any equipment involved, injury, first aid given, and any action taken.

In the last 12 mths Company 7 have had a total of 194 incidents; 5 of which were RIDDORS.

Company 7 display this information for staff on a 'Bee Safe' board detailing the number of RIDDOR accidents to date and the number of days free from a RIDDOR.

Company 7 do not collect any information on non-injury accidents, although any incidents of this nature where damage has occurred should be reported verbally to a manager. The interviewee reports they can recall some that have occurred when they have been in work. But on the occasions where a non-injury accident occurs and they are off site, they will only find out if there is a monetary implication.

E.g.

- Member of staff dropped TV
- Forklift truck reversed into fire door
- Forklift truck drove into sprinkler system
- Forklift truck drove into shelving
- Trolleys damaged caught on clothes damaging them

There is a facility in the database to record near misses that would enable Company 7 to record non-injury accidents if they were reported.

### **7.7.2 Sources of information collected specifically on non-injury accidents**

At the moment non-injury accidents are not formally recorded anywhere. Company 7 do not record the information because it is such a small cost against an incident where someone could put a claim in against the company. These type of incidents are though to generally occur because someone did something wrong and Company 7 try to put steps in place to prevent these types of incidents occurring.

Although the external Facilities Management (FM) Company will have records of any repairs to the building they have carried out which have been assigned to 'misuse and abuse'.

E.g. a forklift truck reversed into fire door. This is then reported to FM/ appropriate contractor. The work is carried out and the invoice is sent to the store to be paid. The invoice is paid from the store budget and is recorded locally as replaced equipment.

FM has the responsibility for the upkeep of the building and therefore the cost of any replacements/ repairs associated with general wear and tear have to be met by them. Therefore the FM has a vested interest in identifying who is responsible.

The costs would also have to be met by any contractors for any losses associated with the work they had done.

Although this does not always happen:

E.g. Contract builders in to move wine and spirits sections. The fixtures they moved were not bolted down properly and the member of staff from Company 7 was on a break. Three of the shelves toppled over leading to significant stock loss and shelf damage. Company 7 had to pay £10000 excess.

However the accuracy of the information of the number of invoices relating to misuse and abuse could be questioned.

E.g. Car drove into a petrol pump. The repairs were claimed off the car owners insurance. FM put in a quote of £4000 for repairs but the actual contractor only cost £300. However FM tried to invoice Company 7 for both.

### **7.7.3 Information collected specifically on the costs of non-injury accidents**

Any costs associated with non-injury accidents are rolled in as store running costs, uninsured losses or in the waste budget, and are therefore not identified as costs of non-injury accidents as such.

The waste budget accounts for approximately 1.3% of the sales (£20000 of £1.6 million per week) and includes food out of date, product stacked poorly/ delivery poorly from depot. It is used to help with stock and orders. Of the £20000 waste budget each week approximately £4500 is non-food stuffs. The interviewee estimates that non-injury accidents would account for less than £1000.

E.g. 2 shelves of racking to be replaced at the moment and could total up to £5000 and will be included in store running costs.

The interviewee reports that if a store were overspending on their budget by £1000 consistently say on maintenance costs then the invoices that had been paid would be looked at to identify the problem. If this was identified as one of individual then there would be coaching and mentoring,

### **7.7.4 How else could they collect the information?**

At Company 7 if the store out performs their business plan then the employees should get a bonus. Therefore including non-injury accidents in the business plan could be a way to encourage staff. However this would need a change in safety culture within the organisation

If there was an account code for invoices to be paid to that directly pointed to misuse/abuse of equipment then they numbers could be easily added up. However this would require support from company wide management.

Issues such as time/ days lost are not a problem for Company 7 as all the losses they could account to non-injury accidents will be repair or replacement costs.

## **7.8 SUMMARY OF INTERVIEW 8**

Reference: Interview 8

Date: 12<sup>th</sup> February 07

Context: Large NHS partnership trust

Interviewee: Health and Safety Manager

The partnership trust visited for interview 8 recently split into the PCT (which buys in services) and the Mental Health and Learning Disability's partnership. The interviewee was from the Mental Health and Learning Disability's partnership, however the responses will be essentially the same as for the PCT. The partnership deals with mental health and learning disabilities, including some work in care homes.

There are approximately 3000 employees in the partnership.

### **7.8.1 Incidents in the past 12 months**

The interviewee estimates that there are 4-5 RIDDOR reportable accidents every month. On average the interviewee receives 8000 incident reports including near misses etc; these are currently in both paper and electronic formats but are to be made into a common system.

Incidents are reported and those reporting take any necessary initial actions. These reports are then followed up and the information is stored onto a computer to enable Company 8 top look for trends etc. Summaries of all incidents will be sent to the managers and directors, and quarterly reports will also be made to the board (these also used to be monthly). In addition an annual report on incidents is also made to the board.

All incidents (including non-injury) are looked at on a matrix of consequence and likelihood to decide the severity of an incident; low, medium, high or serious. Company 8 has excess on their insurance of £10000.

Reports tend to fit into the following categories:

- Clinical
  - Patients' treatment including self-harm, medication errors, and absconding patients.
- Violence
  - To patients and staff
  - Majority of incidents are of this nature BUT *do not* result in an injury
- Incidents/ Fire
- Security
  - Loss/ damage
- Visitors

The majority of incidents relate to physical and non-physical (no weapon/ verbal etc) assault; whether there is an actual injury or not.

### **7.8.2 Sources of information collected specifically on non-injury accidents**

Company 8 do collect some information on non-injury accidents under the relevant categories detailed above.



### **7.8.3 Information collected specifically on the costs of non-injury accidents**

Company 8 have never collected any information on the cost of non-injury (or injury) accidents. The interviewee thinks this could be due to lesser interest in how money is lost through non-injury incidents. However the interviewee also believes that this could change as budgets are reduced and public interest is increased, then the interest of the board etc may increase in these types of incidents if there is a way to save money.

Company 8 do not look at individual absence due to incidents but it would be possible to look at sickness absence overall and the associated costs. However this may not be relevant for non-injury accidents.

The partnership does already have several other sources of data that could be explored:

- Vehicle repairs
  - The partnership has a lot of vehicles and any damage/ repairs are reported to a central point. Therefore the transport manager should have the invoices etc for this and the relevant incident reports.
- General building maintenance/ Repairs
  - This is the responsibility of the PCT. If managers and maintenance talked to each other about what they can do this may help. E.g. If doors keep getting kicked down can they design them differently?
  - Information on the maintenance work is probably collected on a system and could probably be pulled out.
  - This is probably the biggest cost to the partnership- caused by someone smashing something up/ breaking it.
  - Also there is a lot of vandalism to the 300+ properties in the trust:
    - Graffiti – this is hard to cost.
    - Break in – this is easier to cost.
- Damage to equipment
  - The partnership does not many reports of damage to equipment as if something is broken then they will not fill in an incident form and will merely get the item replaced.
  - There may be purchase orders somewhere though.
- Other costs
  - E.g. a fridge-freezer breaks down in a care home and an associated claim is put in for the food etc lost.

All the associated costs will be reported to the board and managers by the financial department; trend will be discussed. However they will not be reported in relation to incidents.

### **7.8.4 How else could they collect the information?**

The interviewee reported new common computer system being introduced to try and combine the methods for collecting incident information for the PCT and the partnership; this would help greatly trying to estimate costs.

Along with this the interviewee thought that it may be a possibility to look at common incidents/ trend and create a simple chart with estimated costs; e.g. 50 doors kicked down- compile appropriate costs. But the interviewee was unsure as to what they would do with the information once they had it.

### **7.8.5 Incentives**

Company 8 would be interested in collecting these data if they get money back within the organisation from an outside budget.

### **7.8.6 Main barriers**

Getting the information:

- Time
  - Hard enough to get people to fill in forms due to time constraints.
  - BUT if they could see the benefits this wouldn't be an issue.
- Access to information
  - Do not get all accidents reported, never mind non-injury incidents.

## **7.9 SUMMARY OF INTERVIEW 9**

Reference: Interview 9

Date: 13<sup>th</sup> February 07

Context: Medium sized Agriculture Company

Interviewee: Health and Safety Manager, and insurance manager

Company 9 has 12 estates across the UK that are managed by very highly trained graduates. They have approximately 200 full time staff. In summer they take on an additional 60 workers on arable farms and approximately 300 workers on their two fruit farms (one in Hertfordshire and one in Blairgowrie, Scotland); the majority of which are foreign students.

Employees' health is very important to Company 9. They do regular blood tests due to the spraying that take place on sites. Company 9 also do spirometry readings and provide 32 physiotherapy sessions per year for each employee. In addition Company 9 also offer stress counselling and this can be either management or self-referral.

### **7.9.1 Incidents in the past 12 months**

Company 9 have had 5 reportable accidents in the last 12 months.

There main incidents for the agriculture part of Company 9 are:

- Machinery related
  - E.g. Last year 3 combine harvesters' combusted; this also meant losses related to crop damage.
  - E.g. Last year 1 tractor burnt by arson
- Slips, Trips or Falls

For accidents Company 9 used to use the HSE online calculator but now have a form when an incident occurs (this is used across the group not just in agriculture and they received 4000 back last year). On this form the following sort of information is covered:

- Design and Services – These are support desks that give costs for repairs
- Loss Prevention – Steps to be put in place to prevent another incident in the future

The form then goes into the insurance system and £X is set aside for the incident; this happens with all incidents and covers not only the immediate costs but also any future costs (e.g. training). This costing element has been bought in during the past 18 months, as there was a need to demonstrate to managers the cost of incidents. This costing element is still not fully up and running yet but it will be once the database is set up and the costing matrix is completed.

The sickness absence is also monitored within Company 9.

Company 9 do not currently collect any information on non-injury accidents or their associated costs; they simply just don't get near misses reported.

### **7.9.2 Sources of information collected specifically on non-injury accidents**

Although Company 9 does not collect any specific information on non-injury accidents they do know what the main types of damage are caused by such accidents; through insurance claims mostly.

### **7.9.2.1     *Damage to Crop***

This is probably the biggest problem for Company 9. Damage or loss to crop can occur for a number of reasons; including weather, in storage or in third party storage.

### **7.9.2.2     *Damage to the environment/ property***

This is the big problem for Company 9. Examples of environmental damage include:

- Diesel leak - £50000 to clear up and restock diesel.
- Oversprayed and damaged a hedge
- Damage caused to 3<sup>rd</sup> party house by equipment
- Clothing damage

### **7.9.2.3     *Damage to equipment***

When a piece of equipment is damaged/ broken down the company who made the equipment are bought in to look at it. They will then tell the manager at the relevant site how much it will cost for the repairs. The manager at the site will keep the invoices/ bills for all these repairs.

### **7.9.3        Information collected specifically on the costs of non-injury accidents**

Company 9 do not collect any information on the costs of non-injury accidents but property damage is a major problem, and there are a number of associated costs with any insurance claims arising from any incident.

Company 9 have just started to analyse information out from accident claims into damages and legal costs.

The costs for legal fees relating to 3<sup>rd</sup> party claims:

- Solicitors
- Loss Adjusters
- Surveillance

They can work out how much things cost except for near misses, and these are worked out centrally despite the manager of a site being ultimately responsible for P&L.

### **7.9.4        Main barriers**

Wouldn't look at something that isn't preventable and where no injury occurred; as prevention is the key.

## **7.10 SUMMARY OF INTERVIEW 10**

Reference: Interview 10

Date: 13<sup>th</sup> February 2007

Context: Large sized warehousing/ distribution centre

Interviewee: HSO, DC HSO, FMM, LA HSO and LA manager

At Company 10 there are 1000 staff on the HQ and distribution centre (DC) site at peak time; 500-600 of which are at the DC.

### **7.10.1 Incidents in the past 12 months**

In 2006 Company 10 had 126 accidents; 19 of which were RIDDORs. The most common incidents were as follows:

- Hit stationary
  - E.g. Bumping truck
  - E.g. Roll cages into something
- Moving/ falling object
- Manual handling
- Slip Trip
- Hit my moving vehicle

At present there is one form to report accidents, incidents, near misses and property damage; advice on how to complete the form is available. Accidents are called into a call centre managed by National Britannia to create report and an email alert is then sent and circulated through H&S staff. However each call costs Company 10 £6 so they do not use it to report near misses.

### **7.10.2 Sources of information collected specifically on non-injury accidents**

The facilities manager has started to look at the recording process for non-injury accidents utilising the current incident reporting system but suggesting some extensions to it. The new system will involve an incident report being created before anything can be fixed.

Company 10 have a site damage meeting with shift managers, DC HSO and FMM to discuss these issues; a forum to discuss problems, costs to put them right, incident investigation, etc.

In 12 months time Company 10 will be in better position to talk about non-injury accidents and their associated costs.

### **7.10.3 Information collected specifically on the costs of non-injury accidents**

Although Company 10 is not currently collecting costs on non-injury accidents, they do have a feel for what the main costs are. Company 10 believe the main costs are the movement of goods; serious collisions with each other of fork lifts/ VNA pickers.

E.g. Pallet pulled out and damaged a sprinkler. The sprinkler head had to be replaced but no stock was damaged.

A lot of costs are property damage:

- £6k racking damage
- Roller shutter doors – Company 10 have 50 bays and in a recent survey it was estimated that it would cost £2k to repair 15 of these bays. However they are reducing the number of bays in operation to try and reduce the costs.
- Truck driven into metal (fabric of the building) – costs of structural engineers etc, survey £2k and costs of repairs.

- Forklifts/ Rollcages
- HGV's on site – knock traffic lights/ signals off, knock canopy off, light scuffs to HGV. Company 10 have an own able contract with another company for the HGV's. The other company will probably have a better idea of costs associated with this and have a better structure to record this.

Downtime is not really an issue for Company10.

#### **7.10.4 How else could they collect the information?**

Company 10 will be collecting information on non-injury accidents in a way that is consistent to that of accident recording.

Another source of information that could be used is that from the corporate purchase department; any information on what has been purchased as replacement item. They could be used to support any initiative on collecting the cost of non-injury incidents to try to drive the costs down.

#### **7.10.5 Incentives**

Company 10 believe the main incentive to recording non-injury accidents would be to make sure nobody is getting hurt and then the costs come as an afterwards.

They are considering a potential addition to the bonus system already in place, putting reductions in non-injury incidents. But Company 10 are very conscious they need to consider both the pros and cons of putting this in places.

#### **7.10.6 Main barriers**

Company 10 believe one of the main barriers to getting near misses reported is the culture within their company. There is a policy in place on the staff intranet with an expectation to report near misses but Company 10 know they need to get management to buy into this and be supportive; no blame culture. They also need to encourage the staff to do something; by cleaning an area staff see this and will look at their area to see if it is clean and then may clean it.

Another barrier to implementing such as system is who fills in the form as some are better than others; so there needs to be drivers in operation to get this taken up. Along with this time is also a problem- forms cannot be too time consuming.

## **7.11 SUMMARY OF INTERVIEW 11**

Reference: Interview 11

Date: 19<sup>th</sup> February 07

Context: Large Company with several call centres.

Interviewee: Health and Safety Manager, and two team members of staff.

Company 11 is a call centre within the finance industry, with approximately 900 staff at location 'A' (if more precise figures are required they can be emailed). Company 11 also have three other sites across the UK.

Although they were not sure whether they were self-insured (employers liability) it was agreed that with £600-700 million turnover, insurance claims were seen as relatively minor.

### **7.11.1 Incidents in the past 12 months**

Company 11 had had 17 RIDDOR reportable incidents in the last 12 months. (128 including non-RIDDOR reportable incidents, across a whole organisation of approx 10,000 people).

The majority of incidents tended to be slips, trips and falls. The most severe accident reported was a cracked bone.

### **7.11.2 Sources of information collected specifically on non-injury accidents**

Although Company 11 does not proactively collect specific information on non-injury accidents, some information is collected through their near miss incident reporting scheme.

This is collected online or through hard copy reports, which are submitted through the reporter's line manager. The reporting system is complemented by periodic alerts through the intranet system, as well as a dedicated health and safety section on the intranet site.

In general, the number of near miss reports was fairly low, and attributed to people not being 'bothered' to report an incident following a trip (where no injury was incurred etc).

### **7.11.3 Information collected specifically on the costs of non-injury accidents**

Company 11 does not collect any information on the costs of non-injury accidents.

### **7.11.4 How else could they collect the information?**

Company 11 discussed the possibility of adapting the current near miss reporting form to enable more accurate recording and therefore collection of non-injury accidents.

This could be accompanied by an electronic alert stating that non-injury accidents should also be included for reporting.

Although Facilities Management (Information Services Department) is responsible for replacing damaged hardware, it is believed they would not record 'why' the item needed replacing. Company 11 no longer has an in-house facility, and calls are now logged by a helpdesk at a remote location. From experience, it is believed the information logged is not very detailed. However it was suggested that the helpdesk could be asked to ascertain (where possible) the

cause of damage. Ideally, this would be done over the phone, in order to reduce the amount of paperwork/time required of staff.

#### **7.11.5 Incentives**

Company 11 were interested in data collection, but due to the potential costs involved in collecting the information required (which would be difficult to estimate accurately), Company 11 suggested a pilot would be useful.

Meanwhile emphasising that no one would be blamed or charged regarding replacement items, and making reporting as simple as possible were identified as ways to encourage staff to report relevant information.

#### **7.11.6 Main barriers**

The main barrier was encouraging people to actually report incidents. As with near miss incident information, it was recognised that there was a tendency for people not to report incidents (as well as difficulties ensuring/ assessing reporting levels). Staff may be even less likely to report non-injury accidents due to a perception that it would be a 'waste of time' reporting small incidents. It was identified that a 'marked shift in attitude' (organisational culture) and strong management commitment would be required to ensure good reporting levels.

The paperwork/ workload was thought to be a barrier to reporting in general, with Company 11 recognising that people would prefer to ring than write (or verbally report an incident to a line manager who would then take responsibility for filling out the paperwork). Furthermore it was believed staff might be unwilling to provide information relating to the cause of damage to furniture/ equipment due to a misconception that they would be blamed or charged for the replacement item. There is also a possibility that the person reporting damaged equipment may not know the root cause of the damage.

As a company in the finance industry, their main interest would be in the cost (i.e. time taken off work) rather than in the cost of damaged furniture etc.

Company 11 believed the true cost (including time of each person involved, contractors/ staff etc) of calculating the cost of non-injury accidents would be time intensive. The company also believed that, realistically, as a low-risk work environment the effort/time etc required to collect this information may not justify the (potentially minimal) benefits seen by the company. However Company 11 also stated they were currently in a state of flux, and so cannot rule out being interested in something along these lines in the future.

#### **7.11.7 Other information**

Company 11 made the point that it depends how far non-injury accident information collection should be taken. It was raised that inspectors, and risk assessments attempt to identify/ prevent issues, but do not necessarily record them. (It was considered a company would rather spend money on inspections than data analysis).



## **7.12 SUMMARY OF INTERVIEW 12**

Reference: Interview 12

Date: 23<sup>rd</sup> February 07

Context: Medium Sized Manufacturing Company

Interviewee: HSO

Company 12 has around 200 employees on site and manufactures ice cream.

### **7.12.1 Incidents in the past 12 months**

Company 12 has had 27 incidents in the last 12 months; none of these incidents have been reportable. Incidents that are reported tend to be a cut finger, manual handling, or property damage. All incidents that are reported are then investigated.

### **7.12.2 Sources of information collected specifically on non-injury accidents**

Some examples of non-injury accidents that have been reported:

- NM on a loading bay where a driver was told to close the door but there was still a pallet on the loading bay. The driver noticed this and no property was damaged.
- Damage to the door of a truck.
- Collision between VNA and a pallet resulting in stock damage. The stock had to be replaced at an estimated cost of £100.

### **7.12.3 Information collected specifically on the costs of non-injury accidents**

Company 12 does not collect/ calculate costs related to non-injury accidents. Although there is a facility on the investigation form for estimated and actual costs to be recorded.

The interviewee felt that the main cost to Company 12 is management investigation time. The interviewee reports the other costs would be in remedial actions; this may be quantified somewhere in the engineering budget (e.g. £x to repair x) and could be requested to be able put the information on the incident form. If engineering get a number of repeat events then they will be looked at or if the budget is exceeded then the reasons would be investigated.

### **7.12.4 How else could they collect the information?**

The interviewee at Company 12 feels that education and a change in safety culture are the key within the company to getting these sorts of incidents reported and getting the forms filled in properly.

This sort of information would be of interest to the company especially if they could see the actual costs of incidents. There isn't a lower limit on the costs that Company 12 would be interested in; all the incidents would be recorded and then a decision could be made as to which they would look at.

### **7.12.5 Incentives**

The interviewee on Company 12 felt the following could be incentives:

- £££ Encouragement?
  - Free Accident reporting books
- Reduce HSE being on their back

### **7.12.6 Main barriers**

The main barriers to collecting these sorts of data are:

- Time – limited resources
- Need backing of the HS committee
- Finding out about the incidents – there will be things happening that they do not find out about.

## **7.13 SUMMARY OF INTERVIEW 13**

Reference: Interview 13

Date: 23<sup>rd</sup> February 07

Context: Large warehouse/ 3<sup>rd</sup> line distributor to a UK retailer

Interviewee: HSO

Company 13 is a 3<sup>rd</sup> line distributor to a large UK retailer. Approximately 300 members of staff work at their northwest warehouse. The UK retailers company 13 work for rent the DC building from another company.

### **7.13.1 Incidents in the past 12 months**

Company 13 have had 123 incidents on site in the last year and 29 near misses.

Accidents Company 13 are having are:

- Manual Handling
- Cuts
- Slip/ Trip/ Falls
- Crush
- Hit by Falling object
- Hit by Moving object

All staff and managers are asked to report near misses as they are treated the same as accidents/incidents; so far this year 14 near misses have been reported.

### **7.13.2 Sources of information collected specifically on non-injury accidents**

Company 13 should be collecting information on non-injury accidents through their incident reporting system. Examples of the main types of non-injury accidents at Company 13 are:

- Truck damage
- RTA
- Damage to:
  - Equipment
  - Loading bays
  - Trailers
  - Barriers
  - Stock – If Company 13 damaged some of the retailers stock then they would pay (part of the contract).
- Collisions
  - Records of the service history of MH equipment are kept including any repairs.

Incidents that happen on site are reported and the HSO hears about them. However, if an incident occurs off site such as an RTA then the transport part will hear about it but the HSO may not. This also applies to any incidents that happen on home delivery as the retailer HQ may be informed but the HSO at the DC may not.

The interviewee reported that there might also be some inaccuracies with the incidents reported in the warehouse. Managers at the DC have to report incidents and damages back to the retailers HQ. However due to the damage KPI's the information the managers' supply back to the retailer HQ may not be that accurate.

All the information on the incidents that are reported are available on a shared drive for all managers to see.

### **7.13.3 Information collected specifically on the costs of non-injury accidents**

Company 13 do not collect information on costs at present for non-injury accidents, although they are investigating ways of collecting these data. Some information is collected on the cost of injury accidents but this is not very accurate and needs to be changed.

The interviewee believes that damage due to non-injury accidents would cost quite a lot. For example at present a shutter door is out of use as it is damaged and it is estimated that this would cost between £2-3k to rectify, and this happens quite a lot. This could then have a knock on effect as it could reduce productivity and increase the risk of another incident if it is not fixed quickly.

Some costs of damage to Company 13 and their employer last year are:

- Racking damage = £4538
- Door Damage = £18442
- Property Damage = £4318
- Scissor Lift Damage = £15051

### **7.13.4 How else could they collect the information?**

The interviewee is currently attempting to work out benchmarks/ estimates for the costs of types of incidents e.g. £x for a cut finger, and aims to use this to demonstrate the financial implications of non-injury accidents. Then the interviewee then aims to develop a way to integrate this into incident investigation.

Some costs are available through alternative sources that the HSO has access to. However sometimes they are recorded but HSO doesn't see them:

- Compensation through home delivery - Last year £25k was paid out in compensation due to damage to peoples houses during delivery e.g. carpets and furniture, however this also includes failure to deliver.
- Insurance Claims - the HSO at Company 13 doesn't see them.
  - Transport will have records of any of their claims and the details.
    - Truck repairs cost £14260 in 2006.
  - There is also site insurance to cover damage to stock etc but the interviewee was unsure of the excess on the policies. The interviewee believes the company would tend to look at incidents around £500 or more but when trying to create benchmarks will be looking at everything. E.g. a cut finger etc could be around £100 with investigation time.

However some costs are not recorded:

- Malicious Damage - Company 13 do have occurrences of malicious damage but these costs are taken as running costs and are hidden away in discipline.

As the DC is rented by the UK retailer for Company 13 to work out of certain areas of maintenance for the building are the retailers' responsibility and some are that of Company 13.

### **7.13.5 Incentives**

The interviewee believes there are several incentives or reasons why this information should be collected and could be useful.

- The interviewee believes that if the company can report the information back to the customer especially in the circumstance of contract bidding or renewal then it would be very useful.
  - Had X types of X accident and then can identify it is due to e.g. poor training of contractors.
- If the company could see how much it was costing them.
- If HSE made it law then it would have to be done, and would therefore make it easier to implement.

#### **7.13.6 Main barriers**

The interviewee at Company 13 believes the main barriers to collecting this sort of information is time. For every incident there is lost time; there is time off the job/ lost productivity for both injury and non-injury accidents.

## **7.14 SUMMARY OF INTERVIEW 14**

Reference: Interview 14

Date: 13<sup>th</sup> March 2007 11.00am

Context: Small Arable farm

Interviewee: Farm manager

Company 14 is a small arable farm carrying out tasks such as farming sugar beat, potato planting and harvesting. They have a lot of equipment and storage facilities.

They have 5 full time regular members of staff in addition to the interviewee; they also have casual staff at harvest times

### **7.14.1 Incidents in the past 12 months**

In the past 12 months Company 14 have had:

- 2 cut fingers
- 1 incident where pin fell out of a trailer boot and a van following the trailer hit it.
- 1 tractor hit a gate
- 1 incident where a gate blew round in the wind and hit a tractor – this caused £3k damage, which was claimed on the insurance. There was also some remedial work carried out on the gate by fitting a new latch.
- Regular incidents of aggression towards staff when out on the roads driving tractors etc.

### **7.14.2 Sources of information collected specifically on non-injury accidents and their associated costs**

Company 14 do not collect any information specifically on non-injury accidents, nor on their costs.

However the interviewee reported the types of things that cost Company 14 the most money in relation to non-injury accidents:

- Repair
  - This may be covered by insurance, although there is a £500 excess so anything less wouldn't be kept a record of, as time is too precious.
  - Anything that required a repair will be recorded in accounts.
  - All insurance claims are kept a record of through the NFU or Royal Insurance and if necessary the local dealer who repairs any equipment.
    - Last year Company 14 had 5 claims:
      - 2 large claims – where the gate blew open into the tractor, and the other where the pin of a trailer was not secured correctly.
      - Glass combine harvester door
      - 2 windscreen claims – these can add up quickly
- Remedial actions to prevent recurrence
- Time
  - Managers time
  - Delays in process
  - Lost crop
- Breakages
  - E.g. Latch on combine came off and broke the bed
- Vandalism
  - Something they have to be very conscious of

- Theft
  - Tractors especially a big problem in the industry

The interviewee reports that the biggest cost to Company 14 is machinery, and that this is inherent to the business.

#### **7.14.3 Incentives**

There are no incentives.

The interviewee says that they don't need to make records of everything because they are hands on and know what's happening,

#### **7.14.4 Main barriers**

Although Company 14 is very interested in the costs they don't record them. This is due to:

- Time
- Wouldn't be able to cost non-injury accidents very easily at all.

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# The cost of non-injury accidents

## Scoping study

This scoping study explored the feasibility of different options for collecting the data required by the Health and Safety Executive for the calculation of the overall cost of workplace accidents.

The aim of the research was to undertake a small scale study of how information on non-injury accidents and associated costs are collected by businesses, and to examine the feasibility of different options for gathering information about the cost of non-injury accidents to businesses. The survey findings are qualitative and for illustrative purposes only.

Commonly reported barriers to collecting the information were time and resources. The findings show that many companies would not be interested in considering potential costs for anything that was less than their insurance excess. It was thought that the time resource required calculating information below this level of 'detail' was not considered cost effective.

Several interviewees reported there was a general problem of underreporting of near misses by staff and, therefore, thought that gathering information on non-injury accidents or anything not required under Health and Safety Law would be a problem. A further problem was the lack of an incentive that would justify the use of time and resources for collecting this type of information. Some incentives were suggested and could arise from perceived business benefits or compliance with regulations.

The study found that, dependent on businesses collecting data on non-injury accidents, there are several ways for HSE to collect that information, for example a large-scale survey, a case study approach or a pilot study.

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