

# WORKPLACE INCIDENT & DANGEROUS OCCURRENCE REPORTING POLICY



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# **INTRODUCTION**

Independent Gymnastics Association (IGA) is committed to ensuring the health, safety and welfare of all gymnasts, coaches, volunteers, employees, contractors and visitors involved in our activities. A key part of this commitment is the accurate reporting, recording and investigation of workplace incidents to support legal compliance, continuous improvement and proactive risk management.

This Incident Reporting & Notification Policy provides clear requirements and procedures for identifying, recording and reporting:

- Serious injuries
- Certain occupational illnesses
- Dangerous occurrences (near-miss incidents with high potential to cause harm)
- Fatalities related to work activities

IGA recognises that our affiliated clubs and activities operate across multiple jurisdictions, each with their own reporting laws and enforcement authorities. Therefore, this policy sets out the responsibilities and reporting requirements for:

- The United Kingdom (including Scotland and Northern Ireland) under RIDDOR 2013
- The Republic of Ireland under the Reporting of Accidents and Dangerous Occurrences Regulations 2016
- · Channel Islands jurisdictions under local health and safety reporting legislation



By ensuring timely and accurate reporting of relevant incidents, we aim to:

- Protect individuals from further harm
- Support regulatory compliance wherever we operate
- Identify trends and take proactive actions to prevent recurrence
- Promote a culture of openness and continual safety improvement in gymnastics

This policy applies to all IGA-affiliated clubs, coaches, staff, volunteers and contractors, regardless of employment status or location.

# **PURPOSE & SCOPE**

The purpose of this Incident Reporting & Notification Policy is to:

- Establish a clear and consistent procedure for reporting, recording and investigating work-related incidents across all IGA-affiliated clubs and activities
- Ensure compliance with applicable legal reporting requirements in the UK, Scotland, Northern Ireland, Republic of Ireland and the Channel Islands
- Enable timely reporting to enforcing authorities where required by law
- Promote continuous improvement by identifying emerging risks and unsafe practices
- Ensure that support, corrective actions and preventative measures are implemented following any incident

The overarching goal is to protect everyone involved in IGA activities by strengthening safety culture, transparency and accountability.

This policy applies to:

- All IGA-affiliated clubs, facilities and programmes
- · All employees, coaches, judges, volunteers and contractors acting on behalf of IGA
- All gymnasts, participants, parents, spectators and other visitors who may be affected by IGAorganised activities
- Incidents occurring:
  - · during training, coaching and events
  - within IGA facilities or temporary venues
  - at external locations where staff or volunteers are operating under IGA direction

This policy covers:

- Workplace fatalities
- Reportable specified injuries
- Reportable occupational diseases
- Dangerous occurrences (high-risk near misses)
- Injuries to non-workers that require hospital treatment directly from the scene
- · Recordable incidents that require internal logging even where external reporting is not required
- Internal reporting of all near-miss incidents to support hazard reduction

This policy applies regardless of contractual status (employee, volunteer, self-employed coach, etc.).

Where local law sets stricter requirements than this policy, the highest standard must always be followed.



# **DEFINITIONS & KEY TERMS**

The following definitions apply throughout this policy to ensure clarity and consistency in reporting:

### **Accident**

An unplanned event that results in injury, ill-health, damage or loss.

### Incident

Any unplanned event or near-miss that has the potential to cause injury, illness, damage or loss. Not all incidents result in harm, but all should be recorded for learning and prevention.

### **Near-Miss**

An incident that did not result in injury or damage but had the potential to do so. Near-misses are internally reportable under this policy to support risk reduction.

### Work-Related

An incident arising out of, or in connection with, work-related activity including:

- · training, coaching and instruction activities
- · supervision of gymnasts
- set-up/pack-down of equipment
- maintenance or facility operations
- · official travel for IGA duties or events

### Reportable Incident

An incident that meets legal criteria for statutory reporting to the relevant enforcing authority. Specific definitions and thresholds vary by jurisdiction (see Section 4 & Section 5).

### Specified Injury

A serious injury defined in law that requires reporting (e.g., certain fractures, amputations, loss of sight). Criteria differ between UK, Ireland and Channel Islands.

### **Occupational Disease**

A medically diagnosed condition caused or made worse by exposure to workplace activities/events, which meets legal requirements for reporting in the relevant jurisdiction.

### **Dangerous Occurrence**

A serious "near-miss" incident specified in legislation that must be reported even if no injury occurs (e.g., equipment failure causing serious risk). Lists vary by jurisdiction.

### Responsible Person

The individual with legal duty to report - may be:

- Employer / club operator
- · Person in control of the premises
- Appointed manager or IGA-approved responsible official
- Delegation is permitted but legal accountability remains with the club operator/employer.



### Regulators / Enforcing Authorities

Authorities responsible for receiving external incident notifications:

- UK: Health and Safety Executive (HSE) or local authority equivalent
- Scotland: HSE or local environmental health departments
- Northern Ireland: HSENI
- Republic of Ireland: Health & Safety Authority (HSA)
- Channel Islands: Local Health & Safety Inspectorate / regulatory authority

### Incapacity for Work

An injured worker's inability to perform normal duties for the required legal reporting threshold. Thresholds differ by jurisdiction (Section 5 for details).

### **IGA**

Independent Gymnastics Association — governing body responsible for oversight, guidance, and monitoring compliance with this policy by affiliated clubs.

# **LEGAL & REGULATORY FRAMEWORK**

IGA operates across multiple jurisdictions. As such, incident-reporting and notification obligations are governed by different regulatory frameworks depending on location. This section outlines the relevant legislation for each jurisdiction, and the core legal duties that apply.

### United Kingdom (England, Wales, Scotland, Northern Ireland)

- The principal legislation is the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013).
- Under RIDDOR, employers, self-employed persons, and those in control of premises have a duty
  to report and maintain records of: fatal accidents; work-related accidents causing specified
  serious injuries; certain work-related occupational diseases; and "dangerous occurrences" (nearmisses or incidents with high potential to cause harm).
- Reports must be made via the appropriate enforcing authority (e.g. the Health and Safety Executive (HSE) or relevant local authority).
- Failure to report a reportable incident under RIDDOR, or to keep required records, is a criminal offence.

Thus wherever IGA or its affiliates operate within the UK, this policy ensures compliance with RIDDOR requirements.

### Republic of Ireland

- In the Republic of Ireland, equivalent duties are set out in the Safety, Health and Welfare at Work (Reporting of Accidents and Dangerous Occurrences) Regulations 2016 (SI No. 370 of 2016).
- Under these Regulations, employers (or other responsible persons) must report workplace accidents and dangerous occurrences to the national enforcing authority the Health & Safety Authority (HSA).



- Reportable events include: fatal accidents; non-fatal accidents where an employee cannot resume normal work for more than three consecutive days (excluding the accident day); and specified dangerous occurrences.
- Reports must be submitted within statutory deadlines: fatal injuries are to be notified immediately (or to Gardaí in emergencies) and formally reported within 5 working days; non-fatal injuries or dangerous occurrences within 10 working days.
- A written record of each accident or dangerous occurrence must be kept for 10 years from the date of the event.

For any IGA-affiliated activity in Ireland, this policy ensures adherence to the Irish statutory requirements for accident and dangerous-occurrence reporting.

### 4.3 Channel Islands (e.g. Jersey, Guernsey)

- Although the UK's RIDDOR Regulations do not automatically apply in the Channel Islands, many jurisdictions within the Islands have local legislation or guidance requiring the reporting of serious workplace injuries or dangerous occurrences. For example, in Jersey there is a statutory reporting requirement for accidents in the workplace under local health & safety law.
- Therefore, for any Club or facility operating under Channel Islands jurisdiction, IGA requires adherence to those local reporting laws. Clubs must check local regulations for what constitutes a reportable event (fatalities, serious injury, hospitalisation, dangerous occurrences, etc.), and report accordingly.
- This policy serves as a framework: local compliance addendums (see Section 13) must be completed to map local law to IGA's internal procedures and ensure full compliance.

### 4.4 Overarching Duties & Principles

Regardless of jurisdiction, the following principles apply to all IGA-affiliated clubs and activities:

- Immediate notification requirement: In the event of a fatality, serious injury or dangerous occurrence, the relevant enforcement authority must be notified without delay (or as soon as legally required).
- Record-keeping requirement: An incident log (or accident book) must be kept, containing details
  of all accidents, injuries, dangerous occurrences, and near-misses, including date, time, persons
  involved, nature of injury, cause, and follow-up actions. Retention periods vary by jurisdiction (10
  years in Ireland, 3+ years in the UK per RIDDOR), so records must be archived accordingly.
- Responsible Person Duty: The person with control of the premises or duty of care (employer / club operator / site controller) is responsible for making reports under this policy, even if the incident involves volunteers or non-employed staff.
- Legal consequences for non-compliance: Failure to report required incidents, or to maintain proper records, may lead to criminal prosecution under relevant health & safety laws.
- Internal reporting and investigation: Beyond statutory reporting, all incidents, dangerous
  occurrences, and near misses should be logged internally, investigated, and corrective action
  taken to improve safety. This ensures compliance readiness and helps prevent future
  occurrences.



### Implications for IGA Policy

Because IGA may operate—or have members, clubs, events—in multiple jurisdictions, your Incident Reporting & Notification Policy must:

- Reference the correct legal framework depending on location (UK, Ireland, or Channel Islands)
- Ensure that local compliance addendums are maintained for each facility under a different jurisdiction
- Define clear internal roles and responsible persons for reporting and record-keeping
- · Maintain a system robust enough to meet the strictest requirements among applicable laws

Failure to do so may result in breach of health & safety law, prosecution, reputational damage, or inability to demonstrate compliance to regulators.

# REPORTING RESPONSIBILITIES

This section clarifies who within Independent Gymnastics Association (IGA) and its affiliated clubs/facilities is legally and operationally responsible for reporting workplace incidents. It ensures that reportable events are notified to the correct authority and that internal procedures are followed swiftly and correctly.

### Who Must Report — "Responsible Person"

Under relevant legislation, the duty to report incidents lies with the "responsible person." Depending on context, this may be:

- The employer or club operator (for employed staff)
- The person in control of premises (for volunteers, self-employed staff, visitors, external contractors)
- · A self-employed person, if working on their own premises or under self-employment conditions

Not eligible to submit official reports under RIDDOR (or equivalent):

- Injured persons (unless self-employed)
- Members of the public
- Other third parties without duty of care or control over the premises

In the IGA context, this means each club or facility must designate a named Responsible Person (or persons) who will submit official incident reports when required.

# Reporting Obligations Depending on Jurisdiction

UK (England, Wales, Scotland, Northern Ireland)

- Under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), responsible persons must report: work-related deaths; certain serious ("specified") injuries to workers; occupational diseases (when diagnosed and reportable); dangerous occurrences ("near-miss" events) as outlined in the regulations.
- Reports must be submitted to the relevant enforcing authority (e.g. Health and Safety Executive (HSE) or equivalent local body) as soon as possible, using the official online reporting system (or by phone in limited cases).



### Republic of Ireland

- Under Reporting of Accidents and Dangerous Occurrences Regulations 2016 (S.I. No. 370 of 2016), responsible persons must report fatal accidents immediately (and formal notification within 5 working days) and non-fatal accidents or dangerous occurrences within 10 working days.
- Employers in Ireland must also keep records of reportable incidents for at least 10 years.

### Channel Islands (e.g. Jersey, Guernsey)

- Although the UK's RIDDOR does not automatically apply, equivalent local legislation or regulatory guidance governs workplace incident reporting. Clubs must consult local law in the relevant Island jurisdiction.
- As part of this policy, clubs in Channel Islands must complete a local compliance addendum indicating who the enforcing authority is and what types of incidents must be reported.

### Internal Reporting and Notification Within IGA / Clubs

Regardless of external reporting obligations, the following internal procedures must always be followed:

- <u>Immediate internal notification</u> when an incident occurs (injury, dangerous occurrence, nearmiss), the Responsible Person or first responder must be notified without delay.
- <u>Internal record entry</u> all incidents (reportable or not) must be logged in the club/facility incident register, including date/time, persons involved, description, and actions taken.
- <u>Escalation to IGA office</u> serious incidents (fatality, serious injury, dangerous occurrence, or where there is risk of regulatory attention) must be reported to IGA.
- <u>Preservation of scene and evidence</u> until external authorities (if required) or internal investigators have reviewed, ensure the incident scene remains undisturbed (unless emergency action is required).
- <u>Cooperation with investigations</u> individuals involved (staff, volunteers, witnesses) must cooperate with internal or external investigations, provide statements, and support lessons-learned processes.

### Consequences of Failing to Report

Failure to comply with reporting duties can have serious consequences:

- Legal liability under RIDDOR (UK) or equivalent legislation (Ireland / Channel Islands) failure to report is a criminal offence.
- Regulatory enforcement actions, potential fines or prosecution
- · Loss of insurance cover, reputational damage, and risk to club licence or affiliation status
- Failure to learn from incidents increased risk of recurrence, harm, or institutional liability

### Designation of Responsible Persons

Each IGA-affiliated club/facility must designate one or more Responsible Person(s) for incident reporting and record-keeping. The designation must be documented and displayed so that all staff, volunteers and contractors are aware.



### Responsible Person(s) duties include:

- Maintaining incident records and ensuring completeness
- Submitting external incident reports when required by law
- · Liaising with enforcing authorities, medical services, and IGA national office as needed
- Ensuring internal investigation and corrective action after incidents or near-misses
- · Coordinating training and awareness to ensure staff know their duty to report

### TIMEFRAMES & OFFICIAL REPORTING PROCESS

This section outlines when incidents must be reported externally, and how the reporting process should be carried out under different jurisdictions — for IGA-affiliated clubs and facilities.

### United Kingdom (RIDDOR 2013)

### Reportable events & when to report

- Fatalities: Report immediately.
- Specified injuries to workers: Report within 10 days (or more quickly if required by local regulatory guidance).
- Dangerous occurrences (reportable "near-misses"): Report as soon as possible ideally within 10 days.
- Occupational diseases (when diagnosed and reportable): Report as soon as the diagnosis is confirmed and the reporting obligation arises.

### Reporting mechanism

- 1. Use the official online reporting system provided by the relevant enforcing authority (e.g. Health and Safety Executive (HSE) or relevant local authority).
- 2. Provide all required details: date/time, location, persons involved, nature of injury/dangerous occurrence, description of event, witnesses, immediate actions taken.
- 3. If online reporting is unavailable (e.g. system downtime), use telephone reporting if permitted by local authority, then follow up by formal report.
- 4. For fatalities: immediate notification by telephone or other required means, followed by full written report.

# Republic of Ireland (Reporting of Accidents & Dangerous Occurrences Regulations 2016) Reportable events & timeframes

- Fatal accidents: Must be reported immediately (or contact emergency services where required), then formal notification to the authority within 5 working days.
- Non-fatal accidents causing incapacity for more than 3 consecutive days (excluding day of accident): Report within 10 working days of the employer becoming aware.
- Dangerous occurrences / prescribed dangerous events: Report within 10 working days of occurrence or employer awareness.

### Reporting mechanism

- 1. Use the notification form prescribed by the Health & Safety Authority (HSA).
- 2. Supply required information: date/time, location, nature of injury or dangerous occurrence, persons affected, circumstances, and immediate actions taken.
- 3. Maintain a copy of the report in the club's incident records and retain for at least 10 years.



### Channel Islands (e.g. Jersey, Guernsey or other applicable jurisdictions)

Because reporting laws vary between islands, the following general process applies under this policy:

- Clubs/facilities must check and comply with the local statutory reporting requirements for their island (e.g. fatality, serious injury, hospitalisation, dangerous occurrence).
- Where local law requires: report the incident to the relevant island's Health & Safety Inspectorate or enforcing authority within the timeframe specified by that law.
- Submit a copy of any external report to the IGA national office within 24 hours of submission.
- If no legal requirement for external reporting exists: record the incident internally (see internal reporting section) but still notify IGA and review for health & safety improvements.

### Internal Notification & Escalation Process (All Jurisdictions)

To support consistent safety oversight and internal compliance across IGA, all clubs must follow this internal process alongside external reporting when needed:

- 1. <u>Immediate internal notification:</u> The incident (injury, dangerous occurrence, serious near-miss) must be reported within 24 hours to the club's Responsible Person (or equivalent), including initial facts and any immediate actions taken.
- 2. Incident logging: Complete the club incident report form and enter details into the internal incident register.
- 3. <u>Risk hold (if needed)</u>: If the incident involves serious risk (e.g. ongoing hazard), do not resume activities until a preliminary safety review is done.
- 4. External reporting: Determine whether the incident meets external reporting thresholds under local law and if so, submit report within required timeframe (see 6.1 6.3).
- 5. <u>Notification to IGA national office:</u> For serious incidents (fatality, serious injury, dangerous occurrence, potential regulatory interest), notify IGA central Health & Safety Compliance Team within 24 hours of the incident.
- 6. <u>Preserve evidence:</u> Preserve scene, equipment, relevant materials, witness details, photos, CCTV (if available), and do not dispose of anything until after external or internal investigation as required.
- 7. <u>Follow-up and investigation:</u> Conduct internal investigation, document findings, corrective actions, and update risk assessments or safety procedures as needed.

### Record Keeping and Documentation

- Maintain external report confirmation (receipt or reference number).
- Retain internal incident logs, investigation reports, witness statements, corrective action records, and follow-up documentation.
- Retain records for statutory or recommended duration depending on jurisdiction (e.g. 3–10 years or longer where required).



# INTERNAL NOTIFICATION & ESCALATION PROCEDURE

This procedure ensures that all incidents — including those not reportable to enforcement authorities — are documented, investigated, and escalated appropriately within IGA. Internal reporting supports a proactive safety culture and ensures regulatory compliance.

### **Immediate Internal Reporting**

Following any accident, incident, near-miss or dangerous occurrence:

- The first responder or witness must immediately notify the Club Responsible Person (or the most senior staff member available).
- Initial information should include:
  - Time, date and exact location of the incident
  - Persons involved and any injuries sustained
  - A brief description of what happened
  - Any emergency action taken

Where required, activities in the affected area must cease immediately until the situation is made safe.

### **Incident Recording Requirements**

All incidents must be entered into the Club Incident Register as soon as possible, including:

- Completed incident/accident report form
- Details of people involved (injured person(s) / witnesses)
- Classification of incident (injury, near-miss, dangerous occurrence, etc.)
- Photographs or supporting evidence (if available)
- Any factors that may have contributed to the incident
- · Immediate control or first aid measures applied

Reports must be factual and objective.

### **Escalation to IGA**

The following must be reported to IGA's Health & Safety Compliance Team within 24 hours:

- Fatality or life-threatening injury
- Serious injury requiring hospital treatment directly from the scene
- Reportable occupational disease diagnosis
- Dangerous occurrence (high-risk near-miss event)
- · Any incident likely to attract media, regulatory, safeguarding or insurance attention
- · Concerns regarding structural or equipment failure
- Any pattern of repeated incidents or unsafe conditions

IGA may require additional details and will provide guidance on next steps.



### Investigation Responsibilities

Once notified:

- The Club Responsible Person must ensure an investigation is initiated within 48 hours
- Investigations must:
  - Determine root causes
  - Identify any failed or missing control measures
  - Document interviews with witnesses where necessary
  - Include any corrective or preventive actions

A final investigation report must be documented and stored with the incident record. IGA may support or conduct the investigation for serious incidents.

### Preserving Evidence

Where a reportable or serious incident occurs:

- The scene must be kept secure and undisturbed unless necessary to prevent further harm
- Relevant equipment must be removed from use until reviewed
- Physical evidence, CCTV footage, and documentation must be retained
- Witness details and initial observations must be recorded promptly

Only authorised personnel may handle evidence.

### Corrective Actions & Follow-Up

Following investigation, clubs must:

- Implement corrective actions promptly
- Review safety procedures and risk assessments
- Provide additional training, if required
- Report completion of corrective actions to IGA for sign-off (where applicable)

Effectiveness of implemented measures must be monitored.

### Confidentiality and Data Protection

- Personal information must be handled confidentially and securely
- Access to incident records must be restricted to authorised personnel
- Data retention must comply with local legal requirements and IGA policy

# **RECORDING & RECORD-KEEPING REQUIREMENTS**

### What Records Must Be Kept

For every incident, accident, dangerous occurrence or near-miss — whether or not it is a "reportable event" under law — the following documentation must be retained by the club/facility:

 Completed internal incident/accident report form (date, time, location, persons involved, description of what happened, immediate actions taken, witnesses, first-aid or emergency response, etc.)



- Details of any external report submitted to enforcing authorities (including a copy of the submission or a saved PDF/confirmation, or the official reference number)
- Investigation report (where applicable), including findings, root cause analysis, corrective actions, and outcome
- Records of follow-up actions (repairs, risk-assessment revisions, staff notifications, training or retraining)
- Supporting evidence (photos, witness statements, CCTV logs, equipment involved, maintenance logs if relevant)
- Records of any medical treatment or hospitalisation resulting from a work-related injury
- Records of hazardous-substance exposure incidents if relevant (linking to your Hazardous Substances Policy)
- Records of near-misses or dangerous occurrences (even if not legally reportable), with any preventive/corrective action taken

### Minimum Retention Periods by Jurisdiction

Jurisdiction / Record Type	Minimum Retention Period*
UK (RIDDOR-reportable events)	<b>At least 3 years</b> from the date the report is made.
Ireland (reportable accidents/dangerous occurrences)	At least 10 years from date of accident/occurrence.
Internal records (non-legally reportable incidents, near-misses, investigations)	Recommend: <b>minimum 5 years</b> , or longer if there could be long-term liability or follow-up risk — to support internal reviews, insurance,

### Format, Storage & Accessibility

- Records may be kept in either electronic or paper format, provided they are secure, legible, and readily accessible if required by enforcement authorities or internal audit.
- Where electronic, ensure backup, access controls, and data-protection compliance (especially where personal health or medical data is involved).
- Incident records should be stored at or near the premises where the work is carried out, or at the club's usual place of business — especially in jurisdictions where the law requires this.
- Sensitive personal data (e.g., health or medical information) must be handled in compliance with data-protection legislation and kept confidential.

### **Record Content Requirements for Reportable Incidents**

For incidents that are legally reportable under RIDDOR (or equivalent in other jurisdictions), the record must include at minimum:

- · Date and time of the incident
- Exact location (club, facility name, address, activity location)
- Names and roles of persons involved (injured person(s), witnesses)
- Nature and description of injury, disease, or dangerous occurrence



- Details of cause or contributing factors (if known)
- Details of first-aid, emergency response, medical treatment or hospitalisation (where applicable)
- Details of external report (reporting authority, date reported, reference number, report form copy or PDF)
- Any immediate action taken, followed by corrective or preventive actions implemented These correspond to the minimum data required under RIDDOR record-keeping rules.

### Review, Audit & Data Retention Policy

- Clubs must review their incident records annually to identify patterns, recurring hazards, or safety deficiencies not just after serious incidents.
- As part of audit and compliance processes, saved records should be checked for completeness, accuracy, and compliance with legal retention requirements.
- Where risk-raising patterns emerge (e.g., repeated near-misses, similar injuries, equipment failure), appropriate risk assessments must be revisited, and safety control measures updated.
- Upon closure of a facility or club, records must be securely archived for the minimum legal retention period relevant to the jurisdiction where the incident occurred.

### Medical & Health Surveillance Records (where applicable)

If health surveillance or occupational-health monitoring is required (e.g. for hazardous-substance exposure), medical and health-surveillance records must be kept in line with legal requirements under applicable regulations (for example, long-term substance exposure may require extended retention).

Confidential medical records should be stored separately under strict data-protection protocols and only accessible to authorised personnel or treating occupational-health professionals.

### Data Protection & Confidentiality

- All personal data held in incident or medical records must be processed and stored in compliance with applicable data-protection laws (e.g., UK GDPR / Data Protection Act, or equivalent local privacy laws).
- Access to sensitive records must be restricted to authorised individuals (e.g., club responsible person, IGA compliance team, designated health & safety officers).
- When sharing records with enforcement authorities, insurers, or external parties, ensure any disclosure is lawful and minimises personal data exposure.

# INCIDENT INVESTIGATION & FOLLOW-UP ACTIONS

### Incident Investigation & Follow-Up Actions

IGA is committed to understanding why incidents occur and ensuring preventative measures are implemented to reduce the risk of recurrence. All incidents — including near-misses — must be investigated proportionately to their potential or actual severity.



### **Purpose of Investigation**

Incident investigations aim to:

- Identify immediate, underlying and root causes
- Prevent recurrence through corrective and preventive actions
- Review whether control measures were adequate and functioning
- Ensure legal compliance with reporting and documentation duties
- Protect gymnasts, staff, volunteers and others from future harm

Investigations focus on learning and improvement - not blame.

### Investigation Triggers & Levels

Investigations are required for:

- All reportable injuries, diseases or dangerous occurrences
- · Any incident resulting in hospital treatment from site
- · Serious near-misses with a high potential for harm
- · Recurring unsafe conditions or patterns of behaviour

Minor incidents may be investigated through a shorter review, while serious events require a full formal investigation.

### Investigation Responsibilities

- The Club Responsible Person must lead or assign a competent person to conduct the investigation.
- IGA Health & Safety Compliance Team may support or lead investigations into serious or complex incidents.
- All staff, volunteers, and relevant witnesses must cooperate and provide factual accounts.

Where external regulatory bodies become involved, the club must support their investigation fully and transparently.

### **Evidence Gathering**

Investigations should collect relevant information such as:

- · Witness statements and contact details
- Photographs, video/CCTV footage (if available)
- · Incident scene sketches or diagrams
- Equipment logs, maintenance/inspection records
- Training and qualification records for those involved
- Environmental or activity conditions at the time of incident
- Previous incident and near-miss history involving similar hazards

Evidence must be gathered promptly and preserved securely.



### Causal Analysis

Investigators must identify:

- Immediate causes what directly led to the event
- Underlying causes unsafe conditions, behaviours, process issues
- Root causes systemic failings (e.g., risk assessment gaps, inadequate training, lack of maintenance, supervision or resources)

Root-cause identification ensures long-term improvements rather than surface-level fixes.

### **Corrective & Preventive Actions**

Following investigation, clubs must implement actions such as:

- Updating procedures and safe systems of work
- · Revising risk assessments
- Repairing or removing unsafe equipment
- Providing further training, supervision or competency checks
- · Introducing new control measures or improving existing ones
- Safety briefings or targeted awareness campaigns

Corrective actions must be documented and tracked to completion.

### Follow-Up & Effectiveness Review

The Responsible Person must:

- Monitor that corrective actions are completed by agreed timescales
- · Confirm actions have effectively reduced the risk
- · Review whether additional measures are required
- Escalate unresolved risks to IGA compliance personnel

Completed actions must be recorded in the incident file and compliance system.

### Communication, Learning & Sharing Insights

Where lessons learned have wider relevance:

- Clubs must communicate findings to affected staff and volunteers
- IGA may distribute anonymised safety alerts or best-practice learning to all clubs

This supports a proactive safety culture and knowledge sharing across the organisation.

# TRAINING & AWARENESS REQUIREMENTS

IGA is committed to ensuring that all individuals involved in our activities understand their responsibilities for incident prevention, reporting and response. Proper training and awareness are essential to maintaining a strong safety culture and legal compliance.



### Who Must Receive Training

Training on this policy and its procedures must be provided to:

- Club operators / employers
- Responsible Persons (designated incident report leads)
- · Coaches, instructors and volunteers
- Administrative or support personnel with health & safety duties
- Temporary, new or self-employed staff working under IGA direction

No individual should be involved in activities without having received appropriate instruction on incident response and reporting requirements.

### **Training Content Requirements**

Training must include:

- · How to identify and respond to workplace incidents, dangerous occurrences and near-misses
- What constitutes a reportable event versus an internally recordable event
- · How to complete an internal incident report correctly
- · How and when to escalate incidents to the Responsible Person or IGA
- · Legal obligations for incident reporting in the correct jurisdiction
- Steps for protecting the scene and preserving evidence following a serious incident
- · Confidentiality and data-protection requirements when handling incident information
- A clear understanding that reporting is encouraged and expected, without blame

Additional training must be provided where activities involve higher-risk settings or equipment.

### Induction Training

Before any staff member, coach or volunteer begins IGA-affiliated duties, they must receive:

- Introduction to this policy
- Awareness of internal reporting contacts and escalation pathways
- Basic incident response and safety communication procedures

Induction training must be documented and signed off.

### Refresher Training Requirements

Training must be refreshed:

- · Annually as a minimum
- · Whenever procedures or legal requirements change
- After any serious incident or identified compliance failure
- · When a new hazard, environment or role is introduced

Refresher sessions must be recorded in each individual's training log.



### Training for Responsible Persons

Designated Responsible Persons must receive additional training covering:

- Statutory reporting requirements and timeframes specific to their jurisdiction
- · Liaison with enforcement authorities
- · Incident investigation procedures
- Evidence preservation and documentation
- · Completion of regulatory report forms
- Oversight of corrections and prevention measures

They must be able to demonstrate competence and confidence in applying this policy.

### Awareness & Communication for All Members

Clubs must ensure:

- Key contacts and reporting steps are displayed clearly in staff areas
- · Incident reporting expectations are highlighted in staff briefings
- Awareness is reinforced through periodic reminders and team discussions

Promoting routine reporting of near-misses is particularly important for early hazard detection and prevention.

### Training Records & Verification

Each club must:

- · Maintain a training register with names, dates, modules completed and refresher due dates
- Review training records as part of audit or compliance checks
- Ensure training completion is verified before assigning duties involving care or supervision

IGA may request training records during audit or investigation.

# **AUDIT & COMPLIANCE MONITORING**

IGA is committed to ensuring consistent application of this policy across all affiliated clubs and facilities. Regular monitoring and audit processes help verify compliance, identify areas for improvement and strengthen organisational safety performance.

### **Compliance Monitoring**

All clubs must implement internal checks to ensure:

- Incident reporting procedures are being followed consistently
- All reportable events are identified and escalated correctly
- Records are completed accurately and retained for required periods
- · Corrective and preventive actions arising from incidents are completed
- Staff and volunteers remain aware of reporting expectations

Monitoring may be ongoing or scheduled at regular operational intervals.



### **IGA Audit Programme**

IGA will conduct audits to review:

- Accuracy and completeness of incident logs
- Compliance with statutory reporting requirements in each jurisdiction
- Evidence of timely escalation and investigation
- Adequacy of control measures following incidents
- Training records relating to incident reporting and response
- Implementation of lessons learned from similar incidents or trends

### Audits may be:

- Planned as part of an annual compliance cycle
- Triggered by serious incidents, significant concerns, repeated non-compliance or reports from insurers or regulators

Clubs must provide full cooperation during audits.

### Performance Indicators & Trend Review

IGA and affiliated clubs must regularly review incident data to:

- Identify recurring causes, hazards or unsafe behaviours
- Analyse near-misses as early warning indicators
- Assess effectiveness of corrective actions
- Drive continual improvement of health & safety practices

Trend reviews should include both quantitative and qualitative assessment.

### Non-Compliance & Improvement Actions

Where non-compliance is identified:

- Clubs must implement corrective actions within agreed timescales
- · Additional training or supervision must be provided where needed
- Persistent or serious non-compliance may lead to review of club affiliation status
- IGA may escalate matters to appropriate authorities if legal duties are not being met

All improvement actions must be documented and monitored until completion.

### Reporting to IGA Leadership & Stakeholders

IGA will provide periodic reporting to relevant governance groups summarising:

- Incident trends
- Key learning outcomes
- Audit findings
- Compliance risks
- Progress on prevention improvements

Safety performance will be used to support strategic risk reduction and safeguarding priorities.



# LOCAL COMPLIANCE ADDENDUMS

Because IGA operates across multiple jurisdictions — each with distinct legal requirements for incident reporting — every affiliated club or facility must maintain a Local Compliance Addendum to this policy. These addendums define the specific legal obligations and reporting procedures applicable to the club's location.

Local addendums ensure that this policy is correctly applied in the UK, Scotland, Northern Ireland, the Republic of Ireland, and the Channel Islands, where laws and reporting systems differ.

### **Purpose of Local Compliance Addendums**

Local addendums exist to:

- · Identify the correct regulatory authority for reporting incidents
- Clarify jurisdiction-specific thresholds for reportable incidents
- Ensure clubs comply with local statutory reporting timeframes
- · Provide clarity where UK RIDDOR requirements differ from Irish or Channel Island regulations
- Ensure staff are aware of region-specific obligations and do not rely solely on UK-based interpretations

A local addendum is mandatory for any club operating outside mainland UK.

### Required Content of Each Addendum

Each club's Local Compliance Addendum must include:

- 1. Jurisdiction & Location Details
  - Country and region (e.g., Scotland, Jersey, Republic of Ireland)
  - Local enforcement authority name and contact details
- 2. Relevant Local Legislation
  - UK: RIDDOR 2013
  - Republic of Ireland: Safety, Health and Welfare at Work (Reporting of Accidents and Dangerous Occurrences) Regulations 2016
  - Channel Islands: Local health & safety and incident-reporting laws (varies by island)
- 3. Reportable Incident Categories
  - Local definitions of reportable injuries, diseases, dangerous occurrences, and thresholds
- 4. Statutory Reporting Timeframes
  - Immediate, 5-day, 10-day, or alternative deadlines based on jurisdiction
- 5. Reporting Method
  - · Online form, email submission, telephone notification, or written form required locally
- 6. Local Emergency Contact Requirements
  - Local authority mechanisms for urgent notification
  - · Safeguarding or child-protection escalation routes if jurisdiction-specific
- 7. Designated Responsible Persons
  - Named individuals authorised to submit official reports
  - · Their contact details and training status
- 8. Record Retention Requirements
  - UK: Minimum 3 years for RIDDOR
  - Ireland: Minimum 10 years
  - Channel Islands: As specified in local law



### When to Use Local Addendums

Local addendums must be used when:

- A club or facility is located in a jurisdiction outside mainland England/Wales
- A club participates in events or activities in another jurisdiction
- A serious incident occurs in a cross-border or travel context
- Staff or volunteers operate temporarily under a different legal authority

When in doubt, clubs must default to the stricter or more protective legal standard.

### **Updating Local Addendums**

It is the responsibility of each club to:

- · Review their addendum annually
- · Update it whenever local law or regulatory guidance changes
- Share updates with all relevant staff and volunteers
- · Submit updated versions to IGA for central record-keeping

IGA may issue updates that require addendum revisions.

### IGA Oversight

IGA will:

- Provide guidance to clubs where updates or corrections are needed
- Support clubs with queries relating to cross-jurisdiction reporting

Clubs must work with IGA to ensure complete and accurate compliance.

### POLICY REVIEW & UPDATE SCHEDULE

This policy must remain accurate, legally compliant, and effective across all jurisdictions in which IGA and its affiliated clubs operate. Regular review ensures the policy reflects current legislation, best practice, and organisational needs.

### Review Frequency

- The policy will be formally reviewed annually by IGA's Health & Safety Compliance Team.
- Additional reviews will occur sooner if:
  - There are changes to relevant legislation (e.g., UK RIDDOR updates, Irish reporting regulations, Channel Islands local law changes)
  - Significant incidents highlight gaps or improvements needed
  - · Audit findings identify areas of non-compliance
  - Organisational structure or activities expand into new jurisdictions
  - Best-practice guidance or regulator recommendations change

The review date and version number must be updated with each revision.



### Interim Updates

Interim updates may be issued outside the annual review cycle where urgent changes are required, such as:

- New reporting requirements introduced by a regulator
- · Lessons learned following a serious incident
- Changes to the reporting process or online submission portals
- Updates to contact details of enforcing authorities

Clubs must implement interim updates immediately.

### Responsibilities for Reviewing and Updating

IGA Responsibilities:

- · Lead and coordinate the review process
- Consult with legal advisors, regulators, insurers or subject-matter experts where necessary
- Ensure jurisdiction-specific requirements remain accurate
- Communicate updates clearly to all affiliated clubs
- · Maintain a version-controlled master document

### Club Responsibilities:

- · Implement updated procedures within their operations
- Update Local Compliance Addendums to reflect changes
- · Communicate relevant updates to coaches, volunteers and staff
- Confirm compliance where required by IGA

### **Communication of Policy Changes**

When the policy is updated:

- Clubs will be notified via official IGA communication channels
- · A summary of amendments will accompany the updated document
- Clubs must brief staff, volunteers and Responsible Persons on changes within a reasonable timeframe
- Revised procedures must be embedded into local operations and training

Where necessary, IGA may hold webinars or provide guidance to support implementation.



# **USEFUL CONTACTS**

### **IGA Internal Contacts**

All incident-related queries, notifications and escalations must be directed to:

Purpose	Contact
Incident Reporting & Health and Safety Escalation	Email: info@igauk.com Phone: 0345 319 7000
General Safety and Policy Support	Email: info@igauk.com Phone: 0345 319 7000

Serious incidents must be reported to IGA within 24 hours of the event.

### **External Enforcement Authorities**

Clubs must report to the correct statutory authority when legally required:

Jurisdiction	Enforcement Authority
England, Wales, Scotland & Northern Ireland	HSE / Local Authority
Republic of Ireland	Health & Safety Authority (HSA)
Channel Islands	Local Health & Safety Inspectorate (varies by island)

# **Emergency Services**

999 (UK & Channel Islands) / 112 (Ireland & Channel Islands) Always pass relevant incident information to responders upon arrival.