

SMIS Data Entry Guidance

COVID-19 (Novel Coronavirus)

20 March 2020

Should instances of COVID-19 be recorded in SMIS?

Cases of COVID-19 (Novel Coronavirus) are only required to be entered into SMIS if they are RIDDOR reportable to the ORR as an exposure to a [biological agent](#) and are related to the operational railway (see guidance on [ORR's website](#) for relevant transport systems). Employers have clear health and safety responsibilities under the Control of Substances Hazardous to Health regulations (COSHH). These regulations protect workers who come into contact with infectious micro-organisms as a direct consequence of their work. COSHH does not however apply where employees are exposed to a disease which is in general circulation and which may happen to be present in the workplace as well. Such cases are therefore not easily linked to an identifiable single event and are therefore anticipated not to be reportable. All other non-operational railway RIDDOR reports should be notifiable to the HSE*.

Examples of non-RIDDOR reportable instances:

- COVID-19 suspected but not confirmed.
- COVID-19 verified by a registered medical practitioner but not contracted via a work-related link.
- Lost time incurred due to self-isolation for suspected COVID-19 (but not a confirmed) instance.

When is an instance of COVID-19 RIDDOR reportable?

A report should be made whenever there is reasonable evidence suggesting that a work-related exposure was the likely cause of the disease.

Instances of COVID-19 are reportable under RIDDOR if a work-related link is established, ie an individual contracted it as a result of their work. There are two such clauses in RIDDOR 2013 that are likely to apply to the operational railway:

- Regulation 9 (b): Any disease attributed to an occupational exposure to a biological agent.
- Dangerous Occurrence 10: Any accident or incident which results or could have resulted in the release or escape of a biological agent likely to cause severe human infection or illness.

Only one report is required if both clauses apply and the circumstances are the same.

Regulation 9 (b)

If an employee contracted COVID-19 and it was reliably attributed to the work as verified by a registered medical practitioner's statement, it would be reportable under RIDDOR 2013 Regulation 9 (b).

These instances are anticipated to be rare, especially if the prevalence of COVID-19 increases in the general population.

Nevertheless, there may be some instances where an individual has either been exposed to or contracted COVID-19 as a result of their work duties and such instances do require reporting under RIDDOR.

Dangerous Occurrence 10

You must report any accident or incident which results or could have resulted in the release or escape of a biological agent likely to cause severe human infection or illness.

COVID-19 is categorised as Pathogen Hazard Group 3 by HSE. Therefore, any release or escape of this virus (although it is highly unlikely to be present or transported in a railway environment) is reportable as a dangerous occurrence under Dangerous Occurrence 10.

How do I report an instance of COVID-19 in SMIS?

Under Regulation 9b

- Create a 'Workforce ill health record' via the SMIS reporting form.
- Add Illness classification.
- Add Illness occurrence details.
- Has this illness occurrence been notified by a medical professional? = Yes.
- What is the RIDDOR reportable category for the illness occurrence? = All diseases and any acute illness needing medical treatment if attributable to a biological agent.

Dangerous Occurrence 10

- Create an "Environmental contamination" via the SMIS reporting form.
- Was there an environmental impact? = Yes
- What type of environmental impact did the event have? = Impact on land (includes trains and stations)
 - Add Which pollutant(s) damaged the environment?
 - What was the pollutant? = Biological

Please refer to Guidance Note – Contingency Planning Arrangements for a Flu Pandemic ([RDG NR-GN FLU01](#)) for passenger train operating companies and Network Rail for further advice.

*** Please check with the HSE for advice if you are unsure about reporting any instance of COVID-19.**