

Incident Investigation



Date: 1-14-2018

Purpose:

The purpose of this program is to have effective procedures for reporting and evaluating/investigating incidents and non-conformance in order to prevent further occurrences.

Responsibilities:

Responsibilities for investigations will be pre-determined and assigned prior to any incidents.

Safety Manager

- Ensures investigations are conducted properly and assists in identifying corrective actions.

Site Manager and Supervisors

- Investigates (or assists) incident investigations.
- Corrects non-conformances.

Accompany (if needed) injured employees to the medical provider for initial treatment.

Employees

Immediately report any injury, job related illness, spill or damage to any property to their immediate supervisor. If their supervisor is not available, the employee will immediately notify the project manager. Employees who could be first responders should be trained and qualified in first aid to help control any loss during the post incident phase.

Procedure:

After immediate rescue or response, actions to prevent further loss should begin when the scene is safe. For example, witnesses, maintenance, engineering personnel, etc. should help assess with integrity of buildings, equipment, bracing, any special equipment, and safe rendering of hazards.

Investigations of Incidents & Non-conformance

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformance.

The following must be reported to the employee's supervisor immediately. If that person is not available, then the company Safety Manager shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment or assets.
- Work related illnesses or injuries; Property damage including vehicle incidents.
- Hazardous chemical spillage, loss of containment and contamination.
- Non-conformance to safety or environmental rules, policies or standards.

The supervisor shall make the necessary notifications and begin the incident investigation process.

In the case of a major injury or incident, the scene of the event should be closed off and kept “as is” at the time of the incident. This is vital for effective incident investigation.

Incident investigation occurs as soon as possible, while the facts are still fresh in the minds of those involved (i.e. witnesses). Take the opportunity to talk with all those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

Equipment

Proper equipment will be available to assist in conducting an investigation. Equipment may include writing items such as pens/paper, tape measures, rulers, cameras, small tools, audio recorder, PPE, flags, equipment manuals, etc. The Safety Manager should have an investigation kit prepared in advance.

Incident Reporting Matrix

The incident reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report shall be completed based on the type of incident.

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Safety Manager	24 hours	Yes
Clinic or Doctor Visit	Safety Manager, Office Manager	ASAP	Yes
In-patient Hospitalization Amputation Loss of an Eye	President, Safety Manager, Office Manager, OSHA	Within 24 hours to State or Federal OSHA	Yes
Fatality	President, Safety Manager, Office Manager, OSHA	Within 8 hours to State or Federal OSHA	Yes
Reportable Spill	Safety Manager	ASAP	Yes
Non-conformance	Safety Manager	24 hours	Verbally Initially
Workman's Comp	Workman's Comp Carrier	1 business day	Employer's Report of Injury

OSHA defines “in-patient hospitalization” as a formal admission to the in-patient service of a hospital or clinic for care or treatment. Treatment in an emergency room is not reportable.

OSHA defines “amputation” as the traumatic loss of all or part of a limb or other external body part. This would include fingertip amputations with or without bone loss; medical amputations resulting from irreparable damage; and amputations of body parts that have since been reattached. If and when there is a health care professional's diagnosis available, the employer should rely on that diagnosis.

Results of incident investigations are communicated to employees via the Incident Notice form as well as Stand Down, and Tool Box Talk.

Time Elements of When Incidents Should be Reported to Applicable Regulatory Agency(s) and the Host Facility/Client

Required incidents must be reported to applicable agency(s) within 8 hours of their discovery. Incidents must also be reported to the client (host facility) as soon as possible, or in a timely manner (within 24 hrs. of the incident).

Incident Review Team and Incident Investigation Report

All incidents will be investigated to the appropriate level with regards to incident severity. While all incidents should be investigated, the extent of the investigation will reflect the seriousness of the incident using a root cause analysis process or similar method determined by the Safety Manager. They may form an incident review team that participates in the determination of the final root cause investigative incident report. The team should be representatives of management or other designees as assigned by the Safety Manager.

Initial Identification/Assessment of Evidence

Initial identification of evidence immediately following the incident might include a list of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors like fatigue, age, or medical condition

Collection/Preservation and Security of Evidence

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All shall be dated.

Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, insuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviewers should also be addressed. All items shall be dated.

The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timeliness for corrective action completion.

Results of incident investigations are communicated to employees via the incident Notice form, stand downs, or tool box talks.

Preparation of the Written Incident Report

Written incident reports will be prepared and include any Field Incident Report Form and a detailed narrative statement concerning the events. The format of the report may include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, any findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

The supervisor completes the Field Incident Report and takes steps below when beginning an incident investigation.

- Provide emergency assistance as needed and qualified for.
- Secure the area as quickly as possible to retain the same condition at the time of the incident.
- Notify management by phone according to the Incident Notification Matrix.
- Identify potential witnesses.

- Use investigation tools as needed (camera, drawings, video, etc.).
- Tag out for evidence any equipment that was involved.
- Interview any witnesses (including affected employee) and obtain written, signed statements, as well as complete the Incident Report and forward to the Safety Manager/Office Manager.
- Implement any immediate corrective actions needed.

Incident Notice Form

RW LaPine Inc. should provide documentation and communication of lessons learned and reviews of similar operations to prevent a reoccurrence or to mitigate similar events. Items learned are reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

In order to communicate incident information and lessons learned from incidents the Safety Manager should communicate the Incident Notice to all work sites. The incident should be discussed in the weekly safety meetings to all work site employees.

Corrective Actions Resulting from Incident Investigations

Investigations should result in corrective actions. Individuals should be assigned responsibilities relative to the corrective actions, and these actions should be tracked to closure.

Site Managers, Supervisors are held accountable for closing corrective actions. Corrective actions for safety improvement at each site are tracked by the Safety Manager to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and the Company Safety and Health Management Program.

Injury Classifications

Injuries shall be classified per the following:

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Injury – An injury which results from a work-related activity.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury

Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate is kept at work but not performing within the essential functions of their regular job.

Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

Training

RW LaPine Inc. shall train personnel in their responsibilities and incident investigation techniques. Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relative to incident investigation and reporting are described below:

- Training frequency will be based on the specific area of responsibility but shall not exceed once every two years.
- Training requirements relative to incident investigation and reporting shall include:
 - Awareness
 - First Responder Responsibilities
 - The Initial Investigation at the Accident Scene
 - Managing the Accident Investigation