# Incident Investigation Policy and Procedure

## Purpose

The purpose of the Incident Investigation Policy and Procedure is to ensure that incidents are investigated according to the injury, or injury potential of an event, in accordance with company policy and OH&S legislation. This will help to control further losses of human and material resources by identifying and correcting unsafe acts and conditions that lead to an incident.

This policy applies to any and all work-related incidents and close calls that affect company employees and others who are performing work for the company.

## Policy

**[Company Name]** requires all employees to immediately report all incidents to their supervisor. Supervisors will then report the incident promptly to management to ensure timely reporting and submission to WorkSafeBC. Each incident that results in worker injury or has a potential for worker injury will be analyzed to determine root causes (i.e., underlying causes that, if removed, would have prevented the incident**)** and contributing factors, and the analysis will be used to recommend corrective actions to eliminate the risk of future incidents.

Some incidents are immediately reportable to WorkSafeBC. Incident sites should not be disturbed unless the safety of workers is at risk.

**[The company]** uses the word *incident* rather than *accident* because there is an inherent belief by many people that accidents just happen and cannot be prevented. We use the word incident because we believe that all incidents can be prevented. Belief that all incidents can be prevented will drive the level of investigation to determine causes that could otherwise be missed.

Incident reports will be reviewed by a supervisor and other management as appropriate to the severity or potential severity of the incident.

Action items from incidents will be documented and tracked for completion and follow-up using our Corrective Action Log. Implementation of action items will be monitored and reviewed by the JOHSC. Safe work procedures will be reviewed by the JOHSC after an incident to ensure that changes required by the investigation findings are implemented and that they meet or exceed jurisdictional requirements.

Injuries or incidents resulting from ergonomic hazards must be investigated.

## Definitions

*Incidents* include unplanned, unwanted events (i.e., accidents) that cause harm to people or damage to property or the surrounding environment. Incidents also include *near misses* in which no injury or damage occurred but might have if conditions had been different.

*Lost-time injury (LTI)* refers to any injury that prevents a worker from coming to work beyond the date of the injury.

*Medical aid* refers to any injury where medical treatment is given by a physician or other registered medical practitioner. Medical treatment usually involves treatment above and beyond that provided at the workplace by a first aid attendant.

*First aid injury* refers to injuries that can be treated at the workplace without the need for medical treatment.

*Occupational illness* is a condition resulting from a worker’s exposure to chemical, biological or physical agents in the workplace to the extent that the health of the worker is impacted.

*Serious injury* is any injury that can reasonably be expected at the time of the incident to endanger life or cause permanent injury. Serious injuries include traumatic injuries that are life threatening or that result in a loss of consciousness, as well as incidents such as chemical exposures, heat stress and cold stress that are likely to result in a life-threatening condition or cause permanent injury or significant physical impairment.

## Responsibilities

### Management

A manager will investigate an incident reported by a direct report. A manager will participate in an investigation of an incident if the severity or potential severity requires action appropriate to the manager’s authority. All investigations requiring immediate notification to WorkSafeBC will be attended by the appropriate management personnel. Copies of investigations required by WorkSafeBC will be provided by the appropriate management personnel.

### Supervisor

Supervisors and site health and safety coordinators (if applicable) must investigate all incidents that involve workers. This includes the following:

* Secure the incident scene to prevent further injury.
* Provide any necessary medical assistance to the injured.
* Gather evidence, including taking statements from witnesses.
* Analyze the evidence.
* Complete an Incident Investigation Report.
* Recommend corrective actions to prevent recurrence.

Supervisors are responsible for ensuring that all incident investigation reports are sent to the appropriate department managers and the Health and Safety Department or Human Resources.

Supervisors must also advise new and returning workers of the requirement to report all incidents, including close calls. An annual reminder to all employees to report incidents is recommended. Supervisors must investigate incidents in a manner that is timely and appropriate to the circumstances and severity of the incident. A supervisor’s incident review and signoff are a requirement.

### Worker

A worker will report to the supervisor all incidents including close calls. A worker will attend the incident investigation unless unable to do so as a result of injury. Workers may choose to report a close call using the company’s form Incident Close Call Reporting, or verbally to their supervisor, who will be responsible for completing the document.

### Joint Occupational Health and Safety Committee (JOHSC)

A JOHSC member should be included in an incident investigation. If not available, another employee knowledgeable in the investigation process may be included in the investigation.

## Procedure

**[Company name]** has an obligation to make certain that all our employees, staff, contractors, volunteers and visitors are aware of the importance of and requirements for reporting and investigating close calls, near misses and other incidents. Investigations of close calls and near misses provide a learning and improvement opportunity to help prevent someone from being injured. An investigation is held to prevent recurrence, not to place blame.

## Incidents

All incidents must be investigated. A preliminary investigation must occur immediately after the incident occurs and an immediate corrective action plan must be put in place to prevent further injuries. Preliminary investigations must be completed within 48 hours of the incident occurring and shared with the joint health and safety committee. A detailed investigation must be completed and submitted to the committee and WorkSafeBC within 30 days of the incident.

An employer must ensure that an incident investigation report required by Division 10 of Part 3 of the *Workers Compensation Act* contains the following:

* Place, date and time of the incident
* Names and job titles of persons injured in the incident
* Names of witnesses
* A brief description of the incident
* A statement of the sequence of events that preceded the incident
* Identification of any unsafe conditions, acts or procedures that contributed to the incident
* Recommended corrective actions to prevent similar incidents
* Names of incident investigators

If a worker is injured on the job or the incident has the potential of injuring a worker, employer investigation responsibilities include the following:

* Provide first aid for the injured worker, if applicable.
* Transport the injured worker to the nearest location where medical treatment can be obtained, if applicable.
* Submit a Form 7: Employer’s Report of Injury or Occupational Disease to WorkSafeBC within three business days of the occurrence or within three business days of you or your representative becoming aware of the incident.
* Report fatalities and serious injuries immediately to the Prevention Emergency Line at 604 276-3301 in the Lower Mainland or toll-free 1 888 621-7233.
* Provide resources for the investigation to occur.
* Submit the final investigation report to WorkSafeBC.

If a worker injury requires more than first aid (for example, medical aid or a lost-time injury), the employer has additional reporting responsibilities, which include the following:

* Report the incident to WorkSafeBC within three business days of the injury occurrence or within three business days of you or your representative becoming aware of the injury.
* Submit an Incident and Injury Report (Form 7) online or complete and submit the Employer’s Report of Injury or Occupational Disease to WorkSafeBC.

### Responsibilities of Managers, Supervisors, Workers and JOHSC

The *Workers Compensation Act* specifies that employer incident investigations must be carried out with the participation of employer and worker representatives. Through Bill 35, Section 174, the Act has been amended to specify that the participation of an employer (or representative of the employer) and worker representative may include, but is not limited to, the following:

* Viewing the incident scene with the persons carrying out the investigation
* Offering advice on the investigation’s scope and methods

Incident Reporting and Investigation Procedure:

* The incident is reported by a person to the company. (An incident involving an employee may be reported by others to the company.) The incident may be reported verbally or in writing.
* The incident site must be visited if possible and the site preserved until the investigation is complete, if safe to do so. Photographs, sketches and other evidence collection should be undertaken promptly. Note: Incidents requiring immediate notification to WorkSafeBC will require communication with WorkSafeBC officers with regard to site access and preservation of evidence.
* The direct supervisor of the employee involved or the person who reported the incident will organize and lead the investigation. The investigation must be carried out by those knowledgeable about the type of work involved and, if reasonably available, with the participation of a JOHSC member.
* The investigation team will include those appropriate to the severity or potential severity and type of incident. (Refer to the Risk Assessment matrix on the Incident Investigation Form.) The team may include people not under the scope of this policy (for example a prime contractor representative if the incident occurred on a worksite).
* The investigation will follow the Incident Investigation Template format, which includes root cause analysis.
* The investigation must be held in a timely manner. A preliminary investigation may be necessary if required attendees are not able to attend due to injury or other reasons.
* Action required as the result of an investigation will be recorded using a Corrective Action Log (CAL) format and tracked for completion by the JOHSC.
* JOHSC will evaluate any future risks that recommendations or corrective actions could create.
* JOHSC will monitor the effectiveness of any changes or implementations.
* JOSHC will communicate the recommendations and corrective actions to all relevant parties.
* All investigation reports will be forwarded to the JOHSC. The JOHSC will review the reports for completeness and determine if additional investigation or distribution is required. Note: All investigations that require notification to the WorkSafeBC will be forwarded after review by the JOHSC and approved by company management or as directed by the WorkSafeBC.
* An industry safety alert will be issued through the company if findings from the investigation could help others prevent injury.

## Training

Managers, supervisors and JOHSC members must be familiar with this policy and associated forms. Training in the investigation process and the company’s specific policy and forms will be determined by company management and communicated to the JOHSC.

The requirement to report and investigate close calls and other incidents will be covered during new employee orientation.

## Review

This policy should be reviewed at least annually, or when revision is required.

Incident investigation historical records should be reviewed annually by the JOHSC in order to:

* confirm that action required was implemented
* determine if the action was effective in prevention of recurrence
* identify trends
* determine areas for improvement.

## Records

Copies of incident investigations will be electronically filed on a company Intranet or kept in a secure filing area.

### Corrective Action Log

A Corrective Action Log (CAL) is used to record deficiencies and is included with the JOHSC monthly minutes. The CAL is updated and posted every month. It identifies an issue, determines the appropriate action, assigns the action to a person, assigns a date for completion of the action, and has an actual completion date. CALs are reviewed monthly by the JOHSC for completion and determination as to the whether the deficiency was addressed to prevent recurrence. CAL’s are reviewed monthly by the JOHSC for completion and determination as to the whether the deficiency was addressed to prevent recurrence.