

<b>Safety Policy &amp; Procedure Manual</b>		Section:	Date: 11-2-2015
		Revision:	
Subject: <b>Incident Reporting and Investigation Policy</b>			

## Purpose

The purpose of this policy is to have effective procedures for reporting and investigating incidents and non-conformances in order to prevent further occurrences.

## Responsibilities

Responsibilities for incident investigation will be assigned prior to occurrence of an incident. Individual responsibilities for reporting and investigating must be pre-determined and assigned prior to incidents.

### Safety Managers

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

### Branch Managers and Branch Safety Officers

- Investigates (or assists in) incident investigations.
- In the event of a minor injury, contacts LTR's triage service provider to report the injury and allows injured employees to discuss the injury with the service provider. If the service provider recommends injured employees be taken to an approved medical provider, accompany LTR injured employees to medical provider for initial treatment and contacts service provider to inform them of the outcome.
- In the event of a major injury or emergency, contacts 911 to request emergency services be provided and accompany LTR injured employees to the emergency medical provider.
- Accompany LTR employee for post-accident drug and alcohol testing.
- Corrects non-conformances.

### Employees

- Immediately report any injury, job related illness, vehicle or equipment incident, or damage to any property to their immediate supervisor. If immediate supervisor is not available, report to the Branch Safety Officer. Employees who could be first responders will be trained and qualified in first

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aid techniques to control the degree of loss during the immediate post-incident phase.

## **Procedure**

After immediate rescue or response, actions to prevent further loss will occur if the scene is safe. If possible, assess, secure, and preserve the scene for effective incident investigation.

## **Investigations of Incidents & Non-conformances**

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 direct supervisor immediately. If that supervisor is not available, the Branch Safety Officer shall be immediately notified for:

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

The Branch Manager and/or Branch Safety Officer shall make the necessary notifications and begin the incident investigation process.

In the case of a major injury or incident the scene 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 within the minds of those involved (i.e. witnesses). Take the opportunity to talk to all of 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.

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## Equipment

Proper equipment will be available to assist in conducting an investigation. Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, flags, equipment manuals, etc. The Safety Manager shall have an incident 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 from the field 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.

### EXTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Owner Client / Triage Service Provider	24 hrs	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes
As Required Injury Reporting	OSHA / Owner Client	Within 8 hrs	Yes
Fire / Explosion	911 / Site Fire Response / Owner Client	ASAP	Yes
Reportable Spill	Site Environmental / SafetyKleen / Owner Client	Within 24 hrs	Yes
Property / Vehicle Damage	Owner Client	Within 24 hrs	Yes

### INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Safety Manager	1 Hour	Yes
Injury Above Minor First Aid	Safety Manager	1 Hour	Yes
As Required Injury Reporting	President/Sr. Safety Manager/Safety Manager	Immediately	Yes
Fire / Explosion	Safety Manager	Immediately	Yes
Reportable Spill	Safety Manager	ASAP	Yes
Property / Vehicle Damage	Safety Manager	ASAP	Yes

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## **Time Elements for OSHA and Client Notification**

Certain required incidents must be verbally reported to OSHA within 8 hours of their discovery per OSHA standard 1904.39 (a). Incidents must also be reported to the owner client as soon as possible or in a timely manner (within 24 hours) if the incident occurred on an owner client's site.

## **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 such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process. The LTR Safety Committee will form an Incident Review Team that participates in the determination of the final root cause investigative incident report. The team consists of representatives of management or other designees as assigned by the LTR Safety Management Team.

## **Initial Identification / Assessment of Evidence**

Initial identification of evidence immediately following the incident could include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

## **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, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should be addressed. All items shall be dated.

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

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## Preparation of the Written Incident Report

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

The Branch Safety Officer completes the LTR Incident Report and takes the following steps when beginning an incident investigation.

- Provide emergency assistance, as needed and qualified for.
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident.
- Notify management by phone according to the Incident Notification Matrix.
- Identify potential witnesses.
- Use investigative tool, as needed (camera, drawings, video, etc.).
- Tag out for evidence any equipment that was involved.
- Interview witnesses (including affected employee) and obtain written, signed statements.
- Prepare LTR Incident Report and send to LTR Safety Management Team at [Accident@ltr.co](mailto:Accident@ltr.co).
- Implement any immediate corrective actions needed.

## Incident Safety Alerts

LTR shall provide documentation and communication of lessons learned and a review of similar operations to prevent reoccurrence. Lessons 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 LTR Safety Team shall send Incident Safety Alerts to all branch locations. The Incident Safety Alerts shall be communicated to all employees to ensure that all have been informed of the incident and corrective actions.

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## **Corrective Actions Resulting from Incident Investigations**

Incident investigations should result in corrective actions, individuals should be assigned responsibilities relative to the corrective actions, and these actions should be tracked to closure.

Branch Managers and Branch Safety Officers are held responsible for closing corrective actions. Corrective actions for safety improvement will be tracked by the LTR Safety Management Team to ensure timely follow up and completion.

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

## **Training**

LTR 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. Training requirements relative to incident investigation and reporting are described below:

- Training frequency will be based on the specific area of responsibility with annual refreshers and retraining as needed.
- 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
  - Collecting Data
  - Analyzing Data
  - Developing Conclusions and Judgments of need
  - Reporting the Results