



INCIDENT INVESTIGATION PROGRAM

A. PURPOSE

The purpose of the EESISIP Sample Corporate Plan Incident Investigation Program is to investigate all incidents and close calls, to identify the root cause(s) and develop corrective actions that can be taken to prevent future occurrences.

B. SCOPE

This Incident Investigation Program is integrated into EESISIP Sample Corporate Plan Health and Safety Program. It extends to all employees and will be implemented for all work-related incidents. The Safety Representative is responsible for the program's implementation and improvement.

C. RESPONSIBILITIES

Management

EESISIP Sample Corporate Plan management is committed to the incident investigation process. Management will provide the resources, time, and authority to ensure the effective execution of this program as well as the recommended corrective actions resulting from the investigation. Management will also review all incident reports and ensure that information is routinely communicated to the workforce.

Safety Representative

The Safety Representative reports directly to upper management and is responsible for this program. All investigations, training, and recommended solutions are coordinated under their direction in collaboration with management. The Safety Representative monitors the results of the program and determines additional areas of focus that are needed. The Safety Representative will also ensure that:

- Incident investigators are effectively trained to conduct incident investigations.
- A system is in place for employees to report incidents.
- Accurate records are maintained and documentation provided upon request.
- Corrective actions are completed on time and effectively implemented.
- Where the incident is covered by DOB the Safety Representative will ensure the Permit Holder representative is notified so they can report it to the DOB section 3301.8.
- Review and improve the program (if necessary) at least annually.



Supervisors

The Supervisors' role in the investigation process is to:

- Support the incident investigation program and participate in investigations if requested.
- Attend incident investigation training as needed.
- Ensure that employees under their supervision have received the appropriate training on the incident investigation process and lessons learned from the investigation.
- Immediately notify management of any injuries, property damage or serious close call incidents.
- Effectively implement approved corrective actions.

Employees

The employee's role in the investigation programs is to:

- Actively participate in the investigation process as requested.
- Attend training (if provided) related to incident investigations, such as lessons learned from an incident that will prevent future occurrence.
- Immediately notify supervisors of any injuries, property damage or serious close call incidents.

D. INCIDENT REPORTING

All employees are required to immediately report incidents to their immediate supervisor. The supervisor is required to take any corrective actions to mitigate hazards and injuries resulting from the incident. Depending on incident severity, supervisors may also be required to complete the Incident Report (See Appendix EESISIP Sample Corporate Plan – 24-Hour Incident Report) including recommendations to prevent recurrence. For serious incidents, a detailed investigation of the incident will begin within 24 hours of the initial incident. A copy of Incident Report will be provided to the Safety Representative within 24 hours and prior to the investigation.

E. INCIDENT INVESTIGATION

For serious incidents, the Incident Investigation will begin within 24 hours and after receiving the initial Incident Report from a supervisor. An Incident Investigation Report (See Appendix EESISIP Sample Corporate Plan – Incident Investigation Report) will be completed by the Safety Representative and submitted to management as soon as possible. The Incident Investigation process will include interviews, and event timeline, identification of immediate, underlying and root cause(s), and recommendations for corrective actions.



Interviews

For serious incidents, the supervisor, affected employees, and witnesses will be interviewed as part of the incident investigation process. All individuals will be interviewed separately. It is recommended a minimum of two people be interviewed where possible for any recorded incident. A summary of the interview will be documented.

Event Timeline

For serious incidents, an event timeline will be developed for each serious incident. The timeline will start with the incident and be developed in reverse using information obtained from the interviews. Each task, event and employee decision that took place should be included in the timeline. The timeline should also include all conditions that would affect decisions made by the supervisor and/or workers.

Identifying Root Cause(s)

For serious incidents after the timeline has been established, the immediate cause will be verified, and the underlying and root cause(s) of the incident identified. The underlying and root cause(s) of the incident will be documented on the Incident Investigation Report.

Recommending Corrective Actions

For serious incidents after the underlying and root causes are identified, corrective actions will be recommended to reduce or eliminate the hazardous acts and conditions. The recommendations should be specific, include an anticipated completion date and be operationally feasible. The proposed corrective action plan should be documented on the Incident Investigation Report under the section Corrective Actions.

When selecting and recommending these corrective actions, possible solutions will be prioritized using the following OSHA Hierarchy of Controls. In this hierarchy of hazard control, the most effective solutions come from the first level, with the following levels offering increasingly less-effective options.

1. Elimination – eliminating the hazard from the workplace.
2. Substitution – replacing a hazardous substance or activity with a less hazardous one.
3. Engineering controls – providing guards, ventilation, or other equipment to control the hazard.
4. Administrative controls – developing policies and procedures for safe work practices.
5. Personal protective equipment – using respirators, earplugs, safety glasses, etc.



F. IMPLEMENTING A CORRECTIVE ACTION PLAN

The Safety Representative will ensure that the corrective actions are completed by the anticipated completion date. Once implemented, corrective actions will be monitored by the supervisor and Safety Representative for effectiveness and to ensure that additional hazards/risks did not result from the actions verify that the underlying and root cause(s) of the incident has been eliminated or reduced. Follow up interviews will be conducted with the supervisor and affected workers to ensure that additional actions are not required.

G. SUPERVISOR AND WORKER TRAINING

Training will be provided to all employees for this program and detail how it will be applied when investigating workplace incidents. Supervisors will receive training on their role and the responsibilities identified in this program. The minimum training for all employees will include the following elements:

- An explanation of the Incident Investigation Program and their role in it.
- An emphasis on the importance and method of prompt reporting of incidents and close calls.
- Review of the Incident Report and Incident Investigation Report, with emphasis on determining contributing factors and corrective actions.

H. PERIODIC PROGRAM REVIEW

The Safety Representative will conduct a program review at least annually to assess the progress and success of the program. The review should be documented. The review will consider the following:

- Evaluation of all training programs and records.
- The need for retraining managers, supervisors, and employees.
- The length of time between incidents, investigations, and implementation of corrective actions.
- The program's success based upon comparison to previous years, using the following criteria:
 - Frequency of incidents.
 - Frequency of workers' compensation claims.
 - Insurance carrier's loss analysis.
 - Employee feedback from safety meetings, direct interviews, and jobsite inspections.