

Clearheart Construction Co., Inc.

Incident Investigation and Reporting

INCIDENT INVESTIGATION AND REPORTING

Apparently simple accidents may actually be caused by many complex reasons. Example: a worker is using a claw hammer on a scaffold plank more than six feet above the ground. The hammer head breaks off, slides off the scaffold surface, and strikes a worker standing below who is not wearing a hard hat. Why did this accident happen? How can it be prevented? With just the facts presented, the fault would seem to rest with the worker who was struck by the falling object. Accident investigation may reveal other contributing factors by answering questions like:

- a. Were hard hats required on the project, were they available, and was this policy enforced by the supervisors?
- b. Were precautions taken to prevent objects from falling from above, such toeboards?
- c. Did the worker inspect his hammer before use? Was he driving nails -- the job for which a claw hammer is designed -- or pounding metal beams?
- d. Why was the worker directly under the scaffold? Was he authorized to be there? Had a control zone been established? What was he doing when he was hit?

After determining the cause of any accident/incident, steps must be taken to prevent a reoccurrence of similar type events. Near-miss mishaps, events which result in no injury or damage, should be investigated because even though the outcomes are different, the causes are the same.

The main purpose of incident investigation is to prevent the same type of incident from reoccurring. An incident investigation will begin immediately after the medical crisis is resolved. The competent person/supervisor on the job site will complete an Incident Investigation Form as soon as feasible. The five questions that must be answered are: Who? What? When? Where? and most importantly, Why did the accident happen?

If the accident is severe, all personnel are authorized to call 911 and/or access a first responder per our posted job site emergency phone lists.

All accidents, incidents, and near-miss incidents will be reported immediately to the supervisor who, in turn, will report this information to the Safety Director.

The Safety Director will ensure that the company for whom we are working, **i.e. client**, is informed of an incident as soon as feasible but no later than 24 hours after its discovery. Incidents would include, but not be limited to:

- a. injuries
- b. spills
- c. property damage
- d. fires
- e. explosions
- f. vehicle damage

Immediately after medical concerns are addressed, all accidents, incidents and near-miss incidents will be investigated.

Catastrophic Reporting Requirements:

Within eight (8) hours after the death of any employee from a work-related incident or the in-patient hospitalization of three (3) or more employees as a result of a work-related incident, either in person or by verbally by telephone, the OSHA Area Office nearest to the site of the incident will be notified. OSHA may be contacted for this purpose using a toll free telephone number: 1-800-321-6742. **Again, the client will be notified in a timely manner (within 24 hours of the incident.)**

Incident Investigation:

The Safety Director is responsible for investigating all incidents and reporting all reportable incidents. An investigating team will be established and individual members will be given training in their individual responsibilities for incident response and an awareness of incident investigation techniques prior to the occurrence of an incident.

Initial training will be given when assigned to the team and refresher training will be given as needed, but at least bi-annually.

Training will include:

- a. Initial identification/assessment of evidence.
 - 1. As appropriate, a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc. will be gathered immediately following an incident.
- b. Collection, preservation, and security of evidence.
 - 1. Evidence such as people, positions of equipment, parts, and papers will be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impounding of documents and equipment

- c. Collection of witness interviews and statements.
 - 1. The importance of gathering unbiased statements and the possible need for follow-up interviews will be emphasized.
- d. Preparation, and preservation, of the written incident report.
 - 1. The written incident report will be prepared using the incident report form which would include a detailed narrative statement of the events leading to the incident. The format of the narrative report may include an introduction, methodology and a summary of the incident; the investigation board members names, narrative of the event, findings and recommendations. Photographs, witness statements, drawing, etc. would also be included.
- e. Using investigative skills to identify corrective actions, assigning responsibilities for corrective actions, and tracking corrective actions to closure.

Employees who are first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

To assist in conducting an investigation, our investigating team will be provided an investigative kit that contains:

- 1. Incident Investigation Forms
- 2. Witness Statement Forms
- 3. Pens, paper, rulers
- 4. Barricade tape
- 5. Camera
- 6. Small hand tools
- 7. Marking devices such as flags
- 8. Tape Recorder
- 9. Equipment Manuals and Standards

Per our Emergency Action Plan, persons will be identified, in the event of a major emergency to perform certain tasks to ensure the safety of our personnel as well as the integrity of equipment, facilities, and materials to prevent further loss after immediate rescue has occurred. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special requirements such as safe rendering of hazardous materials or explosives will be employed.

At the conclusion of any accident investigation, a meeting will be held with all team members to review the process and entertain suggestions for

improvement. Training will include, but not be limited to, investigation procedures, preserving of evidence, taking appropriate photos of accident scenes, first responder actions and results, witness statements, and use of investigative supplies.

While all accidents must be investigated, the degree to which they are investigated must be commensurate with the level of severity of the incident using a root cause analysis process.

Root cause analysis, in the example on page 1, is a methodology for finding and correcting the most important reasons for the accident. Utilizing scaffolding competent persons and other experts, the root cause may turn out to be lack of scaffold training with emphasis on scaffold erection. Had toeboards been installed, the accident would not have happened and, with enhanced training, future accidents could be avoided.

This answer is different than the obvious conclusion that the accident was caused by the hammer head breaking off and hitting the employee.

Accidents with a high degree of severity certainly need more investigative time and effort than, for example, a minor bruise.

After all is said and done, one of the main purposes of incident investigation is to prevent a reoccurrence particularly in the performance of similar type operations. It is important to communicate to all employees the lessons learned from an incident investigation and make sure they understand the existing or improved policies and/or procedures established as a result of the incident investigations.