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Project Incident Notification, Investigation and Reporting Procedure

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Project Incident Notification, Investigation and Reporting Procedure

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Project Incident Notification, Investigation and Reporting Procedure

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Project Incident Notification, Investigation and Reporting Procedure

Table of Contents

1.0	PURPOSE	5
2.0	SCOPE	5
3.0	DEFINITIONS	5
4.0	REFERENCES	6
5.0	RESPONSIBILITIES	6
5.1	Project Manager	6
5.2	Site Manager	6
5.3	HSSE Manager	7
5.4	Investigation Team	7
5.5	Investigation Team Lead	7
5.6	Investigation Facilitator	7
5.7	Superintendents	7
5.8	Project Personnel	8
6.0	PROCESS	8
6.1	General Requirements	8
6.2	Initial Incident Management and Response	9
6.3	Reporting	9
6.3.1	Incident Notification	9
6.3.2	Near Miss	10
6.3.3	Instances of Potential Non-Compliance Notifications	10
6.4	Incident Classification	11
6.5	Incident Categorization	12
6.5.1	Serious Incidents	12
6.5.2	Other Incidents	12
6.6	Incident Investigation Reporting	13
6.7	Other Incidents	15
6.7.1	Initial Response to Incidents	15
6.7.2	Incident Notification	15
6.7.3	Incident Investigation Process	15
6.7.4	Incident Investigation Reporting	16
6.8	Corrective Actions	16
6.9	Incident Investigation Closeout	16
6.10	Incident Investigation Review Meeting	17
6.11	Lessons Learned	17
7.0	TRAINING	17
8.0	RECORDS	17
9.0	ATTACHMENTS	17
	Attachment 1 – Project Incident Classification Matrix	19
	Attachment 2 - EPM-KSS-TP-000022 - Project Incident Notification Report Template	19
	Attachment 3 - EPM-KSS-TP-000023 - Project Initial Notification Report Template	24
	Attachment 4 - EPM-KSS-TP-000024 - Project Causal Factor Checklist	25
	Attachment 5 - EPM-KSS-TP-000025 - Project Documentation Checklist	26
	Attachment 6 - EPM-KSS-TP-000026 - Project HSSE Alert Template	27



Project Incident Notification, Investigation and Reporting Procedure

1.0 PURPOSE

The purpose of this document is to outline requirements and expectations and facilitate the consistent application of the Incident Reporting, Investigation and Management process, including:

- Supporting initial response, including medical treatment of employees, and prevention of further adverse impact or effect.
- Directing appropriate levels of incident notification.
- Determining the appropriate level of investigation.
- Providing standardized forms for documentation and recordkeeping.
- Preventing reoccurrence through identification of incident causes and implementation of corrective actions.
- Providing guidance for the development of lessons learned and continuous improvement.
- Providing opportunities to work together to improve Health, Safety Security and Environment (HSSE) performance.
- The procedure is not intended to supersede any existing Saudi laws or regulations.

2.0 SCOPE

The scope of this procedure applies to all works performed under all Government Construction Contracts executed throughout the Kingdom of Saudi Arabia

It provides information to ensure that all parties are aware of their requirements to facilitate a thorough investigation and to have the necessary tools to perform these tasks.

3.0 DEFINITIONS

Definitions	Description
Accident\Incident	An unplanned event which results in an injury or illness, damage to property, plant, products or the environment.
ALARP	As Low as Reasonably Practicable
First Aid	Emergency treatment administered to an injured or ill person before professional medical care can be administered.
HSSE	Health, Safety Security and Environment
Investigation Facilitator	Individual with qualification in accepted Incident Investigation methodology
IPNC	Instance of Potential Non-Compliance
JHA	Job Hazard Analysis
Lost Workday Case (LWd)	An injury or illness that causes a person to be unable to report to work for his next scheduled shift.
Near Miss	Any event or condition which has the potential to cause death, injury/illness, property damage, and/or environmental impact.
Major Property Damage	For this procedure, a Major Property Damage is defined as: Any occurrence that causes damage to equipment or plant, with no injury or illness to personnel with an estimated value that is equal or exceeds: 300,000 SAR.
Major Environmental Incident	Discrete (or series of) events that result in direct or indirect adverse impacts to one or more environmental media (e.g., land, air, water), wildlife, or human communities. Such incidents typically require immediate response to correct, and may require assistance from external sources outside of the project.
Medical Treatment Case (MTC)	Any medical treatment other than first-aid items listed above provided by a physician/licensed medical professional will be classified as a Medical Treatment/Recordable case
Occupational Injury	Means the management and care of a patient to combat disease or disorder which has been contributed by an injury, illness.
OSHA	Occupational Safety & Health Administration



Project Incident Notification, Investigation and Reporting Procedure

Definitions	Description
Potential	Potential realistic outcome only incorporating the immediate physical and environmental conditions at the time of the event.
Restricted Work Case (RWC)	A work-related injury/ illness that involves one or more days of restricted work will be classified as a restricted work case. Restricted work activity occurs when a physician/licensed medical professional determine either: (1) medical restrictions prevent the employee from performing one or more of his/her routine job functions (work activities the employee regularly performs at least once per week), (2) that the employee is restricted to working less than his/her regularly scheduled work shift, or (3) that the employee be transferred to another position.
Serious Injury	For this procedure, a serious injury is an occupational injury resulting in serious physical harm. Serious physical harm means impairment of the body in which part of the body is made functionally useless or substantially reduced in efficiency, such impairment may be temporary or permanent

4.0 REFERENCES

- OSHA 29 CFR 1904 Recording and Reporting Occupational Injuries and Illness.

5.0 RESPONSIBILITIES

The roles and responsibilities may vary slightly from project to project. Below are examples of minimum expectations by identity.

5.1 Project Manager

The Project Manager is responsible for ensuring the resources and arrangements are available for the implementation and management of this procedure.

5.2 Site Manager

The Site Manager is responsible for the following:

- Confirming that this procedure is implemented and compliance checks are in place.
- Confirming all employees and Subcontractors have the appropriate knowledge and understanding to recognize an incident which requires reporting.
- Confirming adequate resources are allocated to maintain the incident investigation and reporting process.
- Receiving briefings from the contractor Site HSSE Manager regarding incidents and verifying appropriate notifications are made and investigations are conducted.
- Reviewing incident investigation reports.



Project Incident Notification, Investigation and Reporting Procedure

5.3 HSSE Manager

The HSSE Manager is responsible for the following:

- Verifying the appropriate incident notifications are made.
- Determining the appropriate classification of the incident.
- Determining the level of investigation required based on actual and potential consequences.
- Supporting incident investigation resources.
- Managing the closure of corrective actions.
- Coordinating the audits of this procedure.
- Managing the incident investigation and lesson learned data and distribution.
- Reviewing incident investigation reports.
- Attending initial and post-investigation incident review meetings.
- Ensure that all incidents are uploaded into a data base or tracking system.
- Submitting initial incident notification reports in a timely manner.

5.4 Investigation Team

The Incident Investigation Team is responsible for the following:

- Reviewing Contractor incident investigation reports to verify the reporting and investigation is carried out in compliance with this procedure.
- Reviewing incident investigation corrective action evidence for completeness which may include in-field verification of corrective actions.
- Supporting incident investigation resources and developing incident investigation documentation/forms, as required.

5.5 Investigation Team Lead

The Investigation Team Leader is an individual, appointed by the applicable Site Manager, who understands the work process associated with the incident. The Investigator Team Lead is responsible for the following:

- Coordinating with the Management to select appropriate investigation team members, including appropriate resources and expertise.
- Communicating with the Management about the issues associated with the incident investigation process.
- Supporting incident investigation resources and gathers incident investigation supporting documentation, as required.
- Preparation of the investigation report.
- Verifying technical accuracy of the incident investigation report.
- Participating in investigations as appropriate and, if qualified, may act as Investigation Facilitator.

5.6 Investigation Facilitator

The Investigation Facilitator is an individual trained in the investigation methodology to be used for the specific incident. (Usually a HSSE Supervisor/Manager) The Investigation Facilitator is assigned as described in this procedure and is responsible for the following:

- Facilitating the incident investigation process by conducting efficient meetings, guiding the Investigation process, keeping discussions productive and on track, keeping team focused while remaining neutral.
- Confirming that investigations identify systemic root causes.

5.7 Superintendents



Project Incident Notification, Investigation and Reporting Procedure

Superintendents are responsible for the following:

- Acting as Investigation Team Leaders, as applicable, for incidents in their area of responsibility.
- Confirming that this procedure is understood and implemented within their area of responsibility.
- Verifying incidents are reported immediately, no matter how minor they appear to be.
- Confirming the incident scene is protected and preserved as described in this procedure.
- Participating in incident investigations and incident reviews (initial and post-investigation).

5.8 Project Personnel

All Project personnel shall be trained for the following responsibilities:

- Recognizing and reporting incidents, including near-misses.
- Reporting all incidents, no matter how minor they may appear to be.
- Participating in incident investigations, when required.

6.0 PROCESS

6.1 General Requirements

The Project HSSE Manager will confirm that the appropriate level of investigation is completed for all incidents. Incidents shall be investigated under the guidance of a trained Investigation Facilitator.

An Investigation Team Lead will be assigned by the Site HSSE Manager or, as directed by the Site Manager. The Team Lead is responsible to organize the team, gather evidence, conduct the investigation, and verify report completion.

The Management Team will provide incident investigation oversight, support, and assistance in assembling an investigation team, reviewing and approving investigation reports, and monitoring corrective actions and recommendations for closure.

Projects shall ensure that work related incidents are reported and investigated by a competent person, such incidents may include but not limited to:

- Work related injuries and occupational illnesses.
- Incidents resulting property damage i.e. asset or equipment damage.
- Work related motor vehicle incidents.
- Environmental incidents that results in direct or indirect adverse impacts to one or more environmental media (e.g., land, air, and water), wildlife, or human communities.
- Near misses as defined in the Project's incident reporting and investigation procedure.
- Projects and entities must develop a project incident reporting procedure. As a minimum, the procedure should cover the following:
 - Roles and responsibilities (as stated in Section 5 of this procedure) with regards to the reporting protocol and line of communication.
 - Immediate notification requirements: this includes but not limited to all accidents involving a fatality(s), serious injury(s), a major property damage, a major environmental incident and any event with impact on members of the public.
 - All incidents written notification process and the time frame requirements. Standard practice is to submit a written incident notification form within 24 hours of occurrence. A notification form should have the following information as a minimum:
 - Company and Project details.
 - The person in charge name and contact details.
 - Injured person details: (Name, Occupation, ID number, Employment Status, etc.) if applicable.
 - Incident details: (Date, time, location, what happened, incident outcome details, latest known information about any injured person).



Project Incident Notification, Investigation and Reporting Procedure

- Signatures.
- Work instructions in case the incident outcome was major e.g. securing incident scene, reporting to authorities such as General Organization for Social Insurance and the protocol for Informing family members in case of a serious injury or a fatality including repatriation where applicable.
- Incident severity rating criteria (see attachment 1) for details.
- Full investigation and reporting requirements.
- Causal analysis and lessons learned.
- Corrective actions and recommendations.

Projects must ensure that work related incidents are documented in a register. Every year work related incidents records must be archived. It is a best practice to establish an incident database to analyse the data and monitor/compare performance.

6.2 Initial Incident Management and Response

When an incident occurs, the Responsible HSSE Manager or designee and Superintendent shall go to the location of the incident and support any response activities, verify the area is safe and secure, and support the involved personnel to preserve evidence and collect information.

Site Management shall be immediately notified by the Responsible person, who shall confirm the following:

- Appropriate initial response is initiated.
- Proper medical treatment of all injured/ill individuals has been accomplished to include emergency evacuation, if required.
- Actions are implemented to prevent escalation of the incident severity.
- Actions have been taken to protect personnel.
- The scene is preserved.
- Any unsafe conditions are remedied or sealed-off.
- Unauthorized personnel are prohibited from entering/accessing the incident scene.
- The environment is protected (if applicable).
- Potential witnesses are identified and information is obtained from each employee who witnessed the incident, describing what they saw in their own words.
- Relevant evidence is preserved, including but not limited to:
 - Photographs.
 - Work control documents (i.e. JHA, drawings, permits, etc.).
 - Tools.
 - Equipment.
- Preliminary Witness Interviews captured via interview notes.

6.3 Reporting

6.3.1 Incident Notification

Incidents must be immediately reported (verbally) to the responsible Superintendent and the responsible HSSE Manager. The initial verbal notifications will consist of known facts about the incident and immediate corrective actions that are being taken.

Where an incident has an Actual / Potential of High Level and above the HSSE Manager shall immediately notify the Site Manager.

During this initial reporting period, priority is placed on addressing the incident and attending to the safety of people or environmental concerns.



Project Incident Notification, Investigation and Reporting Procedure

Written incident notifications shall be made. Written notification shall be submitted using an Initial Incident Notification form. An example can be found in Attachment 3.

The Contractor Site HSSE Manager is responsible for ensuring the following information is obtained and conveyed:

- Date, time, place, and consequences of the incident.
- Date and time incident reported.
- Initial description of the incident (known facts).
- Initial assessment of actual and potential severity of the consequences.
- Immediate actions being taken.
- Temperature and weather information (if applicable).

6.3.2 Near Miss

Near miss reporting is a critical element required to continuously improve HSSE performance and capture lessons learned where there was potential for adverse impact to the environment, health or potential for injury. All near misses are required to be reported upon occurrence and the responsible entity is required to submit an investigation report for all near miss incidents that occur on the project.

6.3.3 Instances of Potential Non-Compliance Notifications

Events that are Instances of Potential Non-Compliance (IPNC) with the Project's Regulatory approvals, must be communicated to all required identities to support regulatory reporting requirements. Examples of this include, but are not limited to, deviations from permit conditions and commitments specified in HSSE Plans/Procedures; work commenced without Regulatory permits in place; execution changes without appropriate amendments to Regulatory approvals in place.

When regulatory reporting is required it shall be done in coordination with Contractor and Company Project Management. If regulatory authorities are to be notified, the Contractor Site HSSE Manager will confirm that the appropriate Contractor/ Subcontractor notifications have been carried out and that the scene is preserved until:

- The incident analysis team has completed their inspection.
- It is safe to do so.
- Regulator has given approval.

Contractor is responsible for reporting incidents for Contractor-obtained approvals/permits. Contractor-obtained approvals/permits are classified as either High Priority or Other Priority. For incidents associated with High Priority permits, Contractor will consult with Company and provide for Company review and approval a copy of the report/notification to be submitted to the regulatory agency. Company will be required to complete the review on a timely basis that allows Contractor to report non-compliance within the required regulatory time frame. For Other Priority permits/approvals, Contractor will provide Company with a copy of the final report that was submitted to the regulatory agency.

Company will retain responsibility for reporting incidents associated with Company obtained permits/approvals. Contractor will support Company with required information needed to support the Company issued reports/notifications.

Regulatory notifications and reporting will be documented in Contractor and Company incident management systems as appropriate.

IPNCs that are identified through the formal audit process will be reported through this Procedure, but may be processed or managed through the Corrective Action or Non-Conformance Processes, this reporting action will facilitate necessary regulatory reporting.



Project Incident Notification, Investigation and Reporting Procedure

6.4 Incident Classification

The Responsible HSSE Manager, with the assistance of the Responsible Superintendent, will establish the initial incident facts to make a preliminary determination of the severity of the incident.

The initial incident classification may change as more information is learned about the incident.

From information provided in the Initial Notification Form, the Site HSSE Manager will classify the incident based on the actual impact, plus the Potential impact which is the worst realistic outcome, at the time of the incident.

Table 1: Injury/Illness Classification

Classification	Injury / Illness
First Aid	An Occupational Injury involving limited/minimal medical assistance will be classified as first aid, regardless who provides the treatment. First Aid includes the following: • Using nonprescription medication at nonprescription strength, • Tetanus immunizations, • Cleaning/flushing or soaking surface wounds, • Wound coverings, • Butterfly bandages or steri-strips, • Hot or cold therapy, • Non-rigid means of support, including finger guards • Temporary immobilization device used to transport accident victims, • Drilling of fingernail or toenail, • Eye patches, • Removing foreign bodies from eye using irrigation or cotton swab, • Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means, • Massages, • Drinking fluids for relief of heat stress.
Recordable	A work-related injury or illness that meets any of the following: • Death, • Days away from work, • Restricted work or transfer to another job, • Medical treatment beyond first aid, • Loss of consciousness, and • Any occupational illness diagnosed by a physician or other licensed health care professional, even if it does not result in any of the above. <u>Medical Treatment</u> - Any medical treatment other than first-aid items listed above provided by a physician/licensed medical professional will be classified as a Medical Treatment/Recordable case. Examples of Medical Treatment/Recordable cases include: • Sutures, • Prescriptions, • Foreign body extrication involving surgical instruments, • Fractures (including teeth), • Use of medical glue or staples, • Needle sticks, • Splashes or other exposures to another person's blood/infectious material • Second or third degree burns, or burns caused by electric shock / electrocution, • Loss of consciousness



Project Incident Notification, Investigation and Reporting Procedure

Classification	Injury / Illness
	<u>Restricted Work</u> - An injury/illness that involves one or more days of restricted work or a job transfer will be classified as a restricted work case. Restricted work activity occurs when a physician/Licensed Medical Professional determines: (1) an employee cannot perform one or more of his/her routine job functions (work activities the employee regularly performs at least once per week), or (2) An employee cannot work a full workday.
Lost Workday	An injury/illness that causes an employee to be unable to report to work for his/her next regularly scheduled shift. The determination must be made by a physician/licensed medical professional and applies whether days are taken or not.

6.5 Incident Categorization

The Site Manager and HSSE Manager shall make an initial categorization of the incident as “Serious” or “Other.” Any incident whose category is not readily defined shall be deemed a Serious Incident “Not Yet Classified”.

6.5.1 Serious Incidents

Incident Notification with a serious incident, Immediate initial notification shall be made by the Project Manager, Site Manager and/or the HSSE Manager to the Project chain of command in person or by phone. Email is not a viable option for emergency communication and may only be used for follow-up. If the contact is not available, the caller must call the next person on the list.

Project Manager or designee will make initial notification of the incident to the employer.

Within 1 hour of the incident:

The Site Manager/Designee and/or HSSE Manager/Designee shall prepare *Initial Notification Form* and provide to the HSSE Manager for review and issue within one (1) hour of the incident, or as soon as practicable.

This report has a defined distribution list which is which would be determined by the Project and can be itemized on Attachment: 3, *Initial Notification Form*.

Within 24 hours of the incident:

Depending on the seriousness of the event the HSSE Manager may in consultation with the Project Manager and Legal/Risk Management issue a *Project HSSE Alert* or *HSSE Bulletin* (Attachment 6). The alert or bulletin will generally be issued within 24 hours of a Serious Incident.

Within 5 days of the incident:

HSSE Manager/Designee will:

- Review the draft investigation report.
- Input incident investigation data and review data into the project Incident Database.

Project Manager is accountable to communicate incident investigation findings to the Employer.

6.5.2 Other Incidents

6.5.2.1 Incident Investigation Process



Project Incident Notification, Investigation and Reporting Procedure

The HSSE Manager, in conjunction with Legal/Risk Management will determine whether a Serious Incident warrants a privileged investigation, considering the nature of the injury, employer involvement in the investigation, and the potential for government involvement/future liability.

The following investigation process will be implemented for serious incidents that involve fatalities:

- The HSSE Manager will coordinate with contractor organizations to identify an External Incident Investigator to conduct the investigation.

The following investigation process will be implemented for all other serious incidents:

The HSSE Manager will designate an Incident Investigator Team Lead who will convene an investigation team. The team may consist of the following personnel:

- Area HSSE Manager or his designee.
- Site Manager.
- Applicable engineers.
- Applicable supervisors.
- Technical experts.
- Risk Management, insurance representatives and/or consultants.
- Outside legal counsel.

The investigation team will perform the following tasks:

- Inspect the scene of the incident.
- Review key evidence and identifies gaps.
- Develop a plan to complete data gathering.
- Interview witnesses and takes careful notes of what is said using (Attachment 2), *Project Incident Notification Investigation Report*.
- Take photographs to document the scene.
- Review key documents (e.g. Training records, job safety analyses, daily logs, tool box notes, equipment specifications and manuals, permit, HSSE program elements, etc.).
- Contact subcontractors, vendors and employer for information, as appropriate.
- Utilize the *Causal Factor Checklist* (Attachment 4). This checklist is an aid in determining likely causes of an incident. It is intended merely as a reference guide of factors to consider.

6.6 Incident Investigation Reporting

The External Incident Investigator or Incident Investigator depending upon seriousness of incident will:

- Prepare a Draft *Incident Investigation Report*. The form is used to document HSSE incident investigations. Generally, it will be used as a standalone form, however, in some situations, more extensive and formal investigation reports may be necessary. In these circumstances, will become an attachment within the overall report.
- Ensure the *Incident Investigation Report* contains all necessary attachments in Section 13 of the report.
- Obtain concurrence from the members of the investigation team with respect to findings and conclusions of the Draft *Incident Investigation Report*.
- Obtain copies of any incident investigation reports, forms, and/or summaries prepared by any third party.
- Submit the Draft Incident Investigation Report and all supporting documentation to the HSSE Manager for review, comments and approval prior to the release or distribution of the report.
- Review and approval process for the Draft Incident Investigation Report is as follows:
 - HSSE Manager reviews, provides comments or approves the Draft Incident Investigation Report.
 - The Incident Investigator Lead distributes Final Incident Investigation Report to the following:



Project Incident Notification, Investigation and Reporting Procedure

- Project Management
- Personnel identified on the report
- Subcontractor and/or employer as directed by Project Management and Legal/Risk Management.

Note: If a subcontractor (regardless of tier) employee is involved in a fatal, lost time, recordable injury/illness the applicable contractor/subcontractor must submit a report to the HSSE Department describing the incident and related details, including injuries/illnesses and a chronology of the events leading up to the incident.



Project Incident Notification, Investigation and Reporting Procedure

6.7 Other Incidents

6.7.1 Initial Response to Incidents

Should any HSSE Incident occur the first responder/employee shall make notification to their supervisor/manager. The supervisor/manager shall immediately notify the Site Manager and HSSE Manager and ensure the following (subject to the limitations imposed under local law and/or by authorities having jurisdiction) is initiated:

- Proper medical treatment of injured/ill individuals has been accomplished to include emergency evacuation, if required;
- The scene is secured and controlled, any unsafe conditions are remedied or sealed-off;
- Unauthorized personnel are prohibited from entering/accessing the incident scene;
- The environment is protected (if applicable);
- Potential witnesses are identified and contact information is obtained;
- As soon as possible a written, signed statement is obtained from each employee who witnessed the incident, describing what they saw in their own words;
- Relevant evidence is preserved, including but not limited to:
 - Photographs
 - Work control documents
 - Tools
 - Equipment
 - Preliminary witness interviews captured via investigator notes

6.7.2 Incident Notification

Initial notification of Other Incidents shall be made by the Area Site Manager and/or the HSSE Manager/Designee to the Project chain of command in person or by phone or e-mail in accordance with the chain of command.

Based on the severity, or loss potential (≥ 16 on the risk matrix) the Project Manager /Designee may decide to report the incident to the Employer.

Within 1 hour of the incident:

The Site Manager/Designee and/or Area HSSE Manager/Designee shall prepare the *Initial Notification Form* and provide to the HSSE Manager for review within one (1) hour of the incident. This report has a restricted distribution list which is itemized on Attachment: 3, *Initial Notification Form*.

Within 3 days of the incident:

The Site Manager/Designee and/or Area HSSE Manager/Designee shall prepare a *Project HSSE Alert* or *HSSE Bulletin* (Attachment 6). The alert or bulletin will generally be issued within 3 days.

Within 5 days of the incident:

HSSE Manager/Designee will:

- Review draft investigation report. Input incident investigation data and review data into the project Incident Database.
- Project Manager makes final notification of the incident to the Employer.

6.7.3 Incident Investigation Process

Investigation of an incident categorized as “Other” incident typically does not involve Legal/Risk Management Counsel. Refer any questions regarding Attorney/Client Privilege status to Legal/Risk Management Counsel.

The following investigation process will be implemented for Other Incidents:



Project Incident Notification, Investigation and Reporting Procedure

- Area HSSE Manager or his designee will identify the Incident Investigator who will conduct the incident investigation based upon a graded approach.

6.7.4 Incident Investigation Reporting

The Incident Investigator will:

- Prepare a Draft Incident Investigation Report Utilizing Attachment 2:
 - Verify the Incident Investigation Report contains all necessary attachments identified in Section 13 of the Incident Notification Report.
 - Obtain concurrence from the members of the investigation team with the findings and conclusions of the Draft Incident Investigation Report.
 - Obtain copies of any incident investigation reports, forms, and/or summaries prepared by any third party.
- Review and approval process for the Draft Incident Investigation Report is as follows:
 - Area HSSE Manager reviews, provides comments or approves the Draft Incident Investigation Report.
 - The Incident Investigator distributes Final Incident Investigation Report to the following:
 - Site Manager
 - Area HSSE Manager
 - HSSE Manager

Note: Contact HSSE Management for questions about off-site/camp/travel incidents. HSSE Manager/Designee makes final notification of the incident to the Client.

6.8 Corrective Actions

Under the guidance of Management, the investigation team will determine actions to prevent future incidents and assign an owner to each action, to implement the identified actions. The Investigation Team Leader will discuss actions with the owner of the assigned action to determine agreement on the scope of the action and time frame(s) for completion.

Corrective or mitigating actions are to be developed to meet SMART action guidelines, as follows:

Table 2 - SMART Action Guidelines

Characteristic	Questions
Specific	Does the action contain a verb; And, is it specific enough to be easily understood and implemented?
Measurable	Can the implementation of the action be verified by others and/or can the implementation of the action be measured?
Achievable	Is the action and time frame for implementation achievable based upon agreement by the Investigation Team, the Action Owner, and Project Management?
Relevant	Does the action address the root cause for the incident?
Time Based	Has a completion date been set based on the severity of the incident and the action to be implemented?

6.9 Incident Investigation Closeout



Project Incident Notification, Investigation and Reporting Procedure

It is important that the development and review of the Incident Investigation Report is effectively planned and completed within the allocated time frames. This allows for actions to be identified and closed out in a timely manner and lessons learned to be shared and communicated.

6.10 Incident Investigation Review Meeting

The Responsible Project/Site Manager shall schedule an Incident Investigation Review Meeting following the completion of an investigation. The meeting shall be scheduled with Contractor as soon as possible following final approval and submittal of the investigation report. The meeting shall be chaired by the Site Manager with attendance of the Site HSSE Manager, and applicable responsible entity Personnel. The intent of the meeting is for the Responsible Project/Site Manager (most senior responsible person on site) to present the investigation report concerning the incident and provide a summary of the following:

- Status/condition of injured employee, as applicable.
- Executive summary of investigation report.
- Applicable background information.
- Review causative factors and root causes identified.
- Review corrective actions taken to prevent recurrence.
- Lessons learned.
- Status and path forward to close investigation corrective actions.

6.11 Lessons Learned

The Contractor Incident Investigator will develop and distribute a lesson learned document to share the important lessons from all serious investigations. Sharing of lessons learned from low level investigations may be conducted at the discretion of the Site HSSE Manager.

For serious incidents communication, should be distributed to Project personnel as soon as practically possible once the approved incident investigation report is finalized.

Brief summaries of incidents can be distributed via HSSE Daily Notices and discussed at prestart meetings.

Additional safety alerts or bulletins may be issued as directed by the Site HSSE Manager or Site Manager.

7.0 TRAINING

To provide consistency and completeness in incident reporting, training should be provided as appropriate for personnel required to participate in the incident reporting and investigation processes:

- All Project Personnel are made aware of incident reporting requirements.
- Supervisory and HSSE personnel receive an overview of this procedure.
- Supervisors/Superintendents as selected by their Management Team to be trained in Incident Investigations.
- Designated individuals are trained as Investigation Facilitators for Incident Investigation Process.

8.0 RECORDS

- All incidents described in this Procedure are entered into a Contractor Safety Data System.
- Medical records are kept confidential by the Medical Services Subcontractor.
- Incident investigation supporting documentation is maintained and made available for audit purposes.

9.0 ATTACHMENTS

1. Project Incident Classification Matrix



Project Incident Notification, Investigation and Reporting Procedure

2. EPM-KSS-TP-000022 - Project Incident Notification Report Template
3. EPM-KSS-TP-000023 - Project Initial Notification Report Template
4. EPM-KSS-TP-000024 - Project Causal Factor Checklist
5. EPM-KSS-TP-000025 - Project Documentation Checklist
6. EPM-KSS-TP-000026 - Project HSSE Alert Template



Project Incident Notification, Investigation and Reporting Procedure

Attachment 1 – Project Incident Classification Matrix

Identify Potential HSSE Hazards (Qualitative Analysis)

Table 1 provides examples of potential HSSE hazards that may be identified during the hazard identification process. Table 2 provides examples of HSSE incidents and the potential consequences /impacts.

- Examples of HSSE Hazards and Potential Consequences

HAZARD	POTENTIAL HSSE CONSEQUENCE/IMPACTS
Weather (extreme temperatures; rain; high winds; drought; flooding; tornadoes; hurricanes)	Poor field conditions; risk to employee safety and health; environmental damage
Handling of Hazardous Materials	Employee injury/illness; litigation and claims; notices of violation, impact to natural resources/environment, increased budget needs, impact to company reputation
Endemic Diseases (Hepatitis; Cholera; Typhoid; Dengue Fever)	Employee illness
Processing or handling of flammable materials	Risk to employee safety and health; litigation and claims; loss of reputation; loss of business; property loss (fires); environmental damage

- Example of HSSE Incident and Potential Consequence

HSSE INCIDENT	POTENTIAL HSSE CONSEQUENCE/IMPACTS
Employee falls from 15 ft. Scaffold structure resulting in broken bone requiring medical treatment beyond first aid	Fatality
Spill of 1-gallon benzene to a secondary containment structure located outside the building	Moderate to significant impact confined on site, regulatory exceedance, or any off-site impact

Severity and Probability Levels (Quantitative Analysis)

Table 3. *Explanation of Severity Levels* can be used to assign a severity level for the potential consequences/impacts of the hazard/incident. Severity levels are highly dependent on the various HSSE categories.

- Explanation of Severity Levels

SEVERITY LEVEL	POTENTIAL CONSEQUENCES / IMPACTS			
	SAFETY AND HUMAN HEALTH	ENVIRONMENTAL	COMPANY REPUTATION	LIABILITY/ PROPERTY LOSS
1 - Slight	First aid or slight injury/illness no treatment	Insignificant impact, fully contained (Ex Level 3)	Company/client concern, no media attention	Slight loss (<\$10K)



Project Incident Notification, Investigation and Reporting Procedure

SEVERITY LEVEL	POTENTIAL CONSEQUENCES / IMPACTS			
	SAFETY AND HUMAN HEALTH	ENVIRONMENTAL	COMPANY REPUTATION	LIABILITY/ PROPERTY LOSS
2 - Minor	OSHA recordable, medical treatment, restricted work, temporary effect	Negligible short-term impact, confined on site, no regulatory exceedance (Env Level 3)	Community concern with local media attention	Minor loss (\$10-<\$100K)
3 - Moderate	Lost time injury/illness or permanent disability	Moderate to significant impact confined on site, regulatory exceedance, or any off-site impact (Env Level 2)	State or provincial concern with regional media attention	Moderate loss (\$100-<\$1M)
4 - Major	Single fatality or permanent disability of 3 or more persons	Significant impact on or off site, or potential enforcement action (Env Level 1)	National media attention	Major loss (\$1M-<\$10M)
5 - Catastrophic	Multiple fatalities	Catastrophic impact, long-term liability, or irreversible damage (Env Level 1)	International media attention	Catastrophic loss (>\$10M)



Project Incident Notification, Investigation and Reporting Procedure

Table 4. After documenting the potential severity level, determine the probability that such a hazard or incident may occur and assign a probability level using Table 4, *Explanation of Probability Levels*. Together, the severity and probability level are used to determine the risk level. Severity and probability levels must be documented.

• Explanation of Probability Levels

PROBABILITY LEVEL	PROBABILITY TEST	
	PROBABILITY	DEFINITION
1	Practically Never Occurs	Consequence unheard of or not known to have occurred on in the industry
2	Not likely to Occur	Consequence rarely occurs on in the industry
3	Could Occur	Consequence may have occurred on projects and could occur again
4	Known to Occur	Consequence has occurred more than once on projects and will likely occur again
5	Occurs Frequently	Consequence has occurred multiple times on projects and will very likely occur again

Risk Matrix Calculator

Table 5. To calculate the risk level for each hazard/incident, multiply the severity level (1-5) obtained from Table 3 by the probability level (1-5) obtained from Table 4. Using Table 5, Risk Assessment Prioritization Matrix, the hazard is categorized as low, medium, or high risk. Risk levels must be documented

• Risk Assessment Prioritization Matrix

SEVERITY LEVEL		PROBABILITY LEVEL				
		Increasing Probability				
		1 – Practically Never Occurs	2 – Not Likely to occur	3 – Could Occur	4 – Known to Occur	5 – Occurs Frequently
Increasing Severity	1 - Slight	1 LOW	2 LOW	3 LOW	4 LOW	5 MEDIUM
	2 - Minor	2 LOW	4 LOW	6 MEDIUM	8 MEDIUM	10 HIGH
	3 - Moderate	3 LOW	6 MEDIUM	9 MEDIUM	12 HIGH	15 HIGH
	4 - Major	4 LOW	8 MEDIUM	12 HIGH	16 HIGH	20 HIGH
	5 - Catastrophic	5 MEDIUM	10 HIGH	15 HIGH	20 HIGH	25 HIGH

The risk level shown in Table 5 should be applied as follows:

Risk Levels for Hazards	Risk Levels for Incidents
 Low Risk (1-4): Risk is considered broadly acceptable. No further risk reduction is required. Risk is managed with routine procedures and periodically confirmed that the risk continues to	 Low Risk (1-4): Potential future incident risk is considered negligible. No further risk reduction is necessary; manage with routine safeguards and controls to reduce the potential for incident recurrence. Incident



Project Incident Notification, Investigation and Reporting Procedure

remains low. Risk reduction is at management/team discretion.	investigation and further risk reduction is at management team's discretion.
Medium Risk (5-9): Risk is acceptable if reasonable safeguards and controls are in place to reduce the hazards to an acceptable level or ALARP. Responsibility is assigned for action and future monitoring.	Medium Risk (5-9): Conduct incident investigation. Potential future incident risk is tolerable if reasonable safeguards and controls are confirmed to be in place. Additional long-term risk reduction may be required at the management team's discretion to reduce potential for incident recurrence.
High Risk (10-25): Unacceptable risk that must be eliminated or reduced by controls to an acceptable level or ALARP. Responsibility is assigned for action and on-going monitoring. Other means of assessment and planning must be considered to ensure adequate assessment and management of risk.	High Risk (10-25): Conduct incident investigation and root cause analysis. Risk reduction is required to reduce potential future risk to acceptable level based on results of investigation and root cause analysis to reduce potential for incident recurrence.



Project Incident Notification, Investigation and Reporting Procedure

Attachment 2 - EPM-KSS-TP-000022 - Project Incident Notification Report Template

Attorney/Client Privileged? Yes ☐ No ☐	
Legal Privilege Statement Confidential: Attorney/Client Privileged	
Attorney/client privileged incident reports are prepared at the direction of Counsel in anticipation of litigation and/or seeking legal advice to protect CWJV interests. Attorney/client privileged incident reports may not be further distributed within the company or outside the company to any third party without the expressed written permission of the Corporate Legal/Risk Management Counsel.	
SECTION 1. INCIDENT TYPE (Select Only One)	
SERIOUS	
Fatality ☐ Injury/Illness ☐ Environmental (L1/L2) ☐ Significant HSSE Action ☐ Significant Property Damage ☐ Significant Near Miss ☐	
OTHER	
LWDC ☐ Recordable Case ☐ Environmental (L3) ☐ Non-significant Property Damage ☐ Non-significant Near Miss ☐ Utility Hit ☐	
SECTION 2: PROJECT DETAILS	
Office/Project Name:	Site Manager Name:
Project Number:	Contact #:
Project Location:	Contractor Entity(s):
	Sr. HSSE Rep. Name:
	Contact #:
	Employer:
SECTION 3. EMPLOYEE INFORMATION (Required ONLY for Injury/Illness Incidents)	
Injured Employee Name: (Last, First, MI):	(If Subcontractor) Company relationship to: Subcontractor ☐ Sub-tier level (1-9) ☐
Employee ID Number:	Site Hire Date:
Trade Start Date:	Employer (Company name):
SECTION 4. INCIDENT SUMMARY	
Incident Date (dd/mm/yy):	Time of Incident (24hr):
Incident Location:	Shift:
Activity in progress at time of incident.	
Name of Witness/s:	
SECTION 5: INJURY/ILLNESS DETAIL (if applicable): Check if NOT applicable ☐	
Injury, Illness? Injury ☐ Illness ☐	If applicable, briefly describe nature of injury/illness:
SECTION 6: NEAR MISS DETAIL (if applicable): Check if NOT applicable ☐	
Perceived potential risk of:	
Fatality/Injury/Illness ☐ Environmental Damage ☐ Property Damage ☐ Utility hit / Service Interruption ☐	
Additional Information/Details Specific to Near Miss Event (attach additional sheet if necessary):	
SECTION 7: ENVIRONMENTAL DETAIL (if applicable): Check if NOT applicable ☐	
Severity: Level 1 ☐ Level 2 ☐ Level 3 ☐	Impact(s): ☐ Agency enforcement action ☐ Potential offsite impact to human health or environment ☐ Sub-contractor initiated action ☐ Employer initiated action (i.e. shutdown) ☐ Shutdown/work stoppage ☐ Incident requiring action w/no environment impact ☐ Non-compliance order ☐ Other instance requiring off-project notification ☐ Potential impact to water resources ☐ Spill of hazardous substance w/no environmental impact ☐ Release of hazardous substance above Reportable Quantities ☐ Spill of hazardous substance below Reportable Quantities ☐ Spill of hazardous substance offsite ☐ Spill of hazardous substance in waterway
SECTION 8: PROPERTY DAMAGE DETAIL (if applicable): Check if NOT applicable ☐	

Project Incident Notification, Investigation and Reporting Procedure

**Attachment 3 - EPM-KSS-TP-000023 - Project Initial Notification Report
Template**

Date & Time of Incident:		
Project Name:		Project Number:
Incident Location:		☐ Contractor ☐ Sub-Contractor _____ (Give Company Name)
Incident Classification:		
Type	Incident – Actual or Probable Outcome (check all appropriate boxes)	Required Distribution: Restricted to the Following Project Individuals Only
Serious	☐ Fatality(ies) ☐ Occupational Injury/Illness resulting in serious physical harm ☐ Potential Lost-Time Injury/Illness ☐ Potential Recordable Injury/Illness ☐ Hospitalization of Three (3) or more employees for 24 hours or more ☐ Significant Government Action(s) (e.g., citations, police/government agency investigation, or likelihood criminal charges against CWJV) ☐ Significant Property Damage/Loss (≥ \$500,000) Including but not limited to fires, spills, and explosions ☐ Impact on Members of the Public ☐ Significant Environmental Incident (L1 or L2) ☐ Significant Near Miss (≥10 on risk matrix) ☐ Serious Incident – Not Yet Classified	• Site Manager • Construction Manager • HSSE Manager • Project Manager • Legal Dept. • Site Risk Manager • Area HSSE Managers
Other	☐ Lost-Time Injury/Illness ☐ Recordable Injury/Illness ☐ Environmental Non-Reportable Incident ☐ Property Loss (<\$500,000) ☐ Environmental Incident (L3), if appropriate ☐ Non-significant Near Miss (≥10 on risk matrix)	• Construction Manager • Area HSSE Manager • Site HSSE Manager
Brief Description of Incident Facts: (Use only known facts. Do not speculate as to cause, fault or error. Do not use assumptions in description of incident).		
Prepared by: (Signature & Title) prepared) Date & Time (actual time and date		



Project Incident Notification, Investigation and Reporting Procedure

Attachment 4 - EPM-KSS-TP-000024 - Project Causal Factor Checklist

This check list is an aid in determining likely causes of an accident. It is intended merely as a reference guide of factors to consider when determining why an accident may have happened. Use this checklist as a guideline to assess possible causes of an accident.

INSTRUCTIONS FOR USING THE CAUSAL FACTOR CHECKLIST:

1. Using Page 2 of the Checklist, the Investigation Team determines which of the various potential causal factors are associated with the subject incident.
2. A check mark is placed adjacent to the number that corresponds to a specific causal factor.
3. Using Page 1 of the Checklist, the Investigation Team locates each of the checked causal factors, by associated number (from Page 2 of the Checklist), to determine the Causes Categories for the subject incident.
4. The Cause Categories determined using this Checklist are then entered into the investigation form.

CAUSAL FACTOR CATEGORIES	
CAUSE CATEGORY	CAUSAL FACTOR LINKS (CHECKLIST ITEMS)
Planning and Risk Assessment	5.1-5.3; 5.5; 5.7; 6.2; 6.5; 7.1-7.11; 12.1; 15.4; 17.3; 17.4; 20.1; 20.2
People / Behavior and Training	1.1; 1.2; 1.4; 1.7; 1.9; 2.1-2.7; 3.1-3.7; 4.1-4.9; 6.3; 6.6; 9.1-9.11; 10.1-10.5; 11.2-11.5; 12.2-12.4; 13.1-13.9; 14.1-14.3; 15.1; 18.7
Subcontractor Operations	16.1-16.4; 19.1-19.10
Work Environment and Design	7.1-7.11; 8.1-8.5; 17.1; 17.2; 17.5; 17.6
Monitoring and Inspection	5.2; 5.4; 5.6; 6.1; 6.3; 6.4; 6.6; 17.7; 18.1-18.6; 20.3-20.8; 21.1-21.3
Management of Change	15.5; 17.8
Communication	15.7; 21.5; 22.1-22.13
Incident Investigation and Hazard Prevention	15.3; 15.6
Human Factors	1.5; 1.6; 1.8; 7.2
Leadership, Oversight and Direction	1.3; 3.8; 11.1; 11.6; 11.7; 15.2; 15.8; 21.4



Project Incident Notification, Investigation and Reporting Procedure

Attachment 5 - EPM-KSS-TP-000025 - Project Documentation Checklist

DOCUMENTATION CHECKLIST
Information required if available
All Incident Report Form (completed)
Statement from employee
Witness Statements
Supervisor's Statement
Project/Site Manager Statement
Doctors Certificate
Pictures / Photographs/Plans
Copy of Shift Instructions given
Copy of Shift Time Sheet
Copy of Pre-Start Checklist
Copy of previous operators Time Sheet
Copy of previous operators Pre-Start Checklist
Copy of employees training Questionnaires
Copy of Certificates of Competency
Copy of Induction register
Copy of employees training records
Copy of recent service records for machinery involved
Copy of weekly safety inspection for machinery involved
Any Manufacturers recommendations
Maintenance reports for equipment post-incident
Correspondence to or from Client
Correspondence to or from Statutory authority
Copy of any relevant permits, licences or works approvals
Copy of any relevant environmental or health-related monitoring results
Copy of calibration certificates

NB: Documentation listed above must be clearly referenced in the body of the report.

HSSE ALERT

This is an internal project HSSE Alert and should not be circulated externally without the Project Safety or Project Environmental Manager approval.

Incident: (Descriptive Title)		
Workplace Location:	Date of Incident:	Classification:
Description: (Brief description indicating key aspects of incident)	Picture goes here. (Photo showing hazard or result)	
Injury/Damage:		
Possible Contributing Factors:		
Potential Hazards To Be Aware Of:		
Possible Actions To Prevent Recurrence: This incident is currently being investigated. Without pre-empting the outcome of the investigation, a Workplace Manager shall review this alert and determine if the following actions or others should be undertaken to their workplace.		
Authorized By:		Construction Manager
		Project Safety Advisor
For More Information - Contact:		Phone: