Procedure: Work health and safety incident management

Purpose

This procedure describes how the Australian National University (ANU) investigates, reports and takes action when incidents and events (referred to in this procedure as incidents) occur following injuries, illness, hazards and other system failures with a potential to impact on health and safety. This procedure links to the Work Health and Safety Policy and meets compliance requirements for incident management as defined in the *Work Health and Safety Act 2011* (Cth) (WHS Act), the *Work Health and Safety Regulations 2011* (Cth) (WHS Regulations) and the *Australian Radiation Protection and Nuclear Safety Act 1998* (Cth).

Definitions

**Dangerous incident** is any incident in the workplace, that exposes a member of staff, student, volunteer, visitor or contractor or any other person to a serious risk to their health or safety from an immediate or imminent exposure to: an electric shock; collapse or partial collapse of structure, excavation shoring or plant; uncontrolled escape of substances (gas, steam, liquid, pressurised substance); uncontrolled implosion or explosion; unplanned inrush of mud, water or gas or any other event prescribed by the WHS Regulations.

**Emergency** is the result of an incident requiring immediate action and a coordinated response that may include external emergency response services and coordination of stakeholders until the situation is controlled.

**First aid injury (FAI)** is any workplace injury which requires immediate first aid treatment. It does not warrant treatment at the level provided by a qualified medical practitioner and the injured person can return to work within the shift.

**Hazard** is an occurrence with potential to harm a person, the environment or property.

**Incident or event** is an occurrence that could have or did result in harm to a person, the environment or property damage.

**Lost time injury (LTI)** is a workplace injury or illness significant enough to require:
admission to hospital; the next full scheduled day of work missed, is the result of an event, and is outside the control of the WHS management systems of the University. An LTI is not an aggravation of pre-existing injury.

**Medical treatment injury (MTI)** is a workplace injury or illness, significant enough to requiring treatment by a qualified medical professional (for example a doctor). Treatment at this level begins with a stich/suture or a prescription. A sterile strip (medical skin closer) to close a wound is not an MTI, as a First Aider could apply this as a standard item in a first aid kit. Visits to a physiotherapist following a workplace injury are an MTI if more than 4 visits are required.

**Near miss** is an occurrence/event that may have resulted in an injury or illness. A near miss can be notifiable as prescribed in the WHS Act based on the potential risk of an event.

**Notifiable incident** is an incident that results in death(s), serious injury or illness, a dangerous incident or a radiation incident.

**Radiation accident** is an occurrence associated with controlled apparatus, controlled materials or at a controlled facility, which results in, or has the potential to result in, exposure to ionising or non-ionising radiation, such as to injure, damage or harm any person or the environment. This includes occurrences involving, or resulting from, acts or omissions that were deliberate, reckless or negligent.

**Serious injury or illness** is an incident that requires person(s) to seek immediate treatment in a hospital as an inpatient, or immediate treatment for:

- amputation of any part of the body;
- a serious head injury;
- a serious eye injury;
- a serious burn or the separation from skin from underlying tissue;
- a spinal injury;
- the loss of bodily function;
- a serious laceration; or
- medical treatment within 48 hours of exposure to a substance.

Psychological distress caused by staff grievance must first be addressed through the staff grievance resolution process.

**Worker** is anyone who carries out work for the University. A worker includes staff, volunteers, contractors and students gaining work experience at the University.
Procedure

Scope
1. This procedure applies to all staff, students, visitors and contractors and other personnel at workplaces under the management or control of the University.
2. This procedure contains four parts:
   - incident response;
   - incident reporting;
   - incident investigation; and
   - identifying actions.

Incident response
3. When an incident occurs, the immediate staff, students, visitors or contractors shall respond as per the Emergency response procedure:
   - Call for help (000) for life threatening emergencies.
   - Then dial ANU Security on 02 6125 2249.
   - Provide first aid.
   - Make the area safe.
   - Secure the scene and do not let anyone or anything leave the site unless it is to make the area safe or to seek help. The site where a notifiable incident occurs shall not be disturbed until the Regulator inspects the site or gives direction to do so.
   - Report to a supervisor.

Incident reporting
4. University staff, students, visitors and contractors shall report incidents and hazards immediately to their supervisor and through the online Workplace safety incident and hazard reporting tool with as much detail as possible without delay.
5. Staff shall report via: Incident notification using Workplace safety hazard & incident reporting tool.
6. Students shall report via: Quick link to online WHS incident notification in ISIS.
7. Where a staff member is unable to report an incident due to incapacity, hospital stay, computer access issues etc., the supervisor or first aid officer should
complete as much information as possible via the online WHS incident notification. When this is not possible please call the Work Environment Group (WEG) (02 6125 2193).

8. When a serious incident has occurred it is very important that the incident scene is preserved and must not be disturbed for any reason following the emergency response.

9. Scene preservation of a serious incident or injury is the responsibility of the local area supervisor, following advice from the local area Safety Officer and a member of WEG. The scene cannot be returned until the Associate Director WEG has received confirmation from the respective Regulator (or police, emergency services agency or coroner) that it can be returned to operation. A significant fine / penalty could be issued to the University or supervisor for failure to preserve the scene as per Comcare Penalties.

10. The supervisor shall escalate the reporting to their Manager and WEG immediately following these guidelines:

- Report all injuries or incidents in person.
- Phone call or text your immediate supervisor and if they are unavailable, contact another supervisor.
- Serious injury or illness, dangerous incident or radiation accidents are to be reported via a telephone call and the online Incident notification using the Workplace safety incident and hazard reporting tool.

11. The numbers to call are:
- During office hours – WEG extension 52193 or 02 6125 2193
- After hours – University Security (02 6125 2249).

12. Where a single incident involves multiple people/casualties, it is only necessary to submit one incident report via the Workplace safety incident and hazard reporting tool. The form allows multiple names to be added or additional names can be added at a later date.

13. University staff and students working at another workplace (e.g. CSIRO, another university) should report incidents to the host organisation and to the University via their immediate supervisor and the Workplace safety incident and hazard reporting tool.

14. All visitors and contractors shall report any incident or hazards that occur in University buildings or on University grounds. They should contact:
- their University supervisor/contact person;
• staff within the building or nearest building;
• responding first aid or security officers; or
• WEG (6125 2193).

Reporting notifiable incidents

15. The Associate Director WEG shall notify the Regulatory Authority within 24 hours of a notifiable incident occurring or as required by the Regulator. Prior to notifying the regulator approval from the Director of Human Resources must be obtained.

16. A work related death requires immediate notification by telephone and follow up in writing using the Regulator’s Online Incident Notification Form. This is to be completed by the Associate Director WEG.

17. Any serious injury or illness, or dangerous incident, requires an immediate notification by telephone and in writing using the Regulator’s Online Incident Notification Form. This is to be completed by the Associate Director WEG.

18. All records of incidents shall be kept for at least 5 years from the date the incident.

19. In the event of an injury to an employee that may be considered compensable, WEG, rehabilitation case management team will provide assistance and guidance to develop an injury management plan in accordance with the Rehabilitation Policy.

Incident Investigation

20. Medium, low or report only level Incident investigations are conducted by local area supervisors and local area Health and Safety Representatives (HSR), when available. WEG provides guidance in determining the level of the incident. The type and degree of investigation depends on the classification and severity of the incident (Table 1).

21. All incidents shall be classified by a competent WHS Consultant from WEG using the hazard assessment tools found in the WHS hazard management procedure.

22. The WHS Consultant shall determine the rating of the incident as low, medium, high or extreme as per Table 1 below to ensure an appropriately resourced investigation for the level of incident.

Table 1 Incident category matrix
<table>
<thead>
<tr>
<th>Incident Category</th>
<th>Incident characteristics</th>
<th>Incident investigation required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report Only (1)</td>
<td>Non-Work related incident/injury</td>
<td>Provision of low level recommendations and controls to be facilitated by College/Service Division within the Workplace incident and hazard reporting tool</td>
</tr>
<tr>
<td>Low (2)</td>
<td>FAI Low score on WHS hazard matrix</td>
<td>Investigation to be facilitated by College/Service Division within the Workplace incident and hazard reporting tool</td>
</tr>
<tr>
<td>Medium (3)</td>
<td>MTI Medium score on WHS hazard matrix</td>
<td>Investigation to be facilitated by WEG</td>
</tr>
<tr>
<td>High (4)</td>
<td>LTI High score on WHS hazard matrix</td>
<td>Investigation to be facilitated by WEG</td>
</tr>
<tr>
<td>Extreme (5)</td>
<td>Fatality, Multiple fatality Extreme on WHS hazard matrix</td>
<td>Third Party Investigation</td>
</tr>
</tbody>
</table>

23. Where an incident is determined as high or extreme, it is to be forwarded to Associate Director WEG and the Director of Human Resources for confirmation of the rating and to appoint a third party for the investigation.

24. Legal advice should be considered for medium and high category incidents or incidents likely to be compensable. The Associate Director WEG will advise following consultation with the Director of Human Resources and the Legal Office.
Incident investigation planning

25. The Associate Director WEG shall assign a WHS Consultant to the incident investigation team as required based on the category of the incident. The incident investigation team will include someone with competency in investigating incidents.

Incident investigation data collection

26. All data shall be referenced on the incident investigation report and the Workplace safety incident and hazard reporting tool. The incident investigation team shall collect the following data where possible:

- a summary of the scene of the incident and any evidence (security footage, photos, sketches), description of environmental factors at the time such as lighting, noise level, effect of wind/rain etc., any signage or barricading;
- a timeline leading up to the incident and immediately following the incident;
- a copy of any safe working tools in use at the time (such as safety working instructions, risk assessments, permits to work, relevant training records of persons involved, any manual or maintenance records for equipment involved, any material substance sheets for substances, any checklists; and
- supervisor and witness statements shall be recorded on the Supervisor statement form; and
- any interviews conducted.

27. Any interviews conducted shall maintain confidentiality to the extent possible and focus on fact finding.

Incident investigation analysis

28. The incident investigation team shall begin the analysis process by thoroughly checking the completeness and accuracy of the data. It can be useful at this stage to arrange the data into the following categories:

- People: information relating to witnesses and persons involved in the incident.
- Environment: information relating to the weather, immediate work area (ventilation, airflow, temperature, lightening, noise, dust, visibility), incident scene, condition of infrastructure.
- Equipment: information relating to plant, equipment, vehicles, substances.
- Procedures: information relating to instructions for the work such as plans, risk assessment, drawings, safe work procedures, daily prestart meeting
notes.

- Organisation: information regarding the training and competency of workers, communications, organisational structure of workers.

29. The 5 whys methodology is recommended to determine the root cause of incidents. ICAM™ (Incident Causation Analysis Method) or Taproot™ may also be used when more detailed investigations are required as directed by the Associate Director WEG.

30. The methodology shall be facilitated by a person with competency in these analysis techniques.

Investigation reporting

31. An interim investigation summary report will be generated for the Associate Director WEG by the incident investigation team. The Associate Director WEG will review the interim investigation summary reports to assess:

   - If the investigation analysis methodology was appropriate;
   - if key facts contributing to the incident were accurate (use PEEPO);
   - if root causes are accurate; and
   - if actions address the root causes.

Investigation actions

32. Actions will be generated by the incident investigation team in consultation with the workers in the area where the incident occurred to address any deficiencies identified from the root causes. Refer to the WHS actions procedure. The hierarchy of controls shall be used to ensure the actions address the highest level of practical controls. Refer to the WHS hazard management procedure. The actions shall be documented in the incident investigation report.

Endorsement/approval of findings from incident investigation

33. The incident investigation team will circulate the incident investigation report to the WEG team and other relevant persons, such as WHS Committees as required, for peer review following the interim review.

34. The incident investigation team will collate the feedback from the peer review and approve the report and actions prior to submitting to the Associate Director WEG for communication.

35. The incident investigation data will not be released back to the area until the Associate Director WEG is satisfied with the incident investigation report.
Communication of incidents and actions

36. The Associate Director WEG may communicate the lessons learned from incidents. This may take the form of a hazard alert or a memorandum on the incident. The locations that these communications can be posted include WHS local noticeboards, the WEG website and minutes of WHS committee meetings.

37. The Associate Director WEG may communicate safety documents, i.e. Safety Alerts, Safety Awareness Bulletins, Hazard Alerts, Lessons Learned etc., to the University through the Director of Human Resources and the Safety Officer network representing each of the WHS committees in the governance structure. These documents will be accessible on the WEG website.

38. The Associate Director WEG will communicate the findings from serious incident investigations to the University Audit and Risk Management Committee (ARMC) and/or the University Council on request from the Director of Human Resources via the Executive Director Administration and Planning.

39. Serious incidents will be reported in the WHS Council report which is produced on a 6 weekly basis by the Associate Director WEG.

Monitoring and review of incidents and actions

40. The Associate Director WEG will monitor the progress of actions identified from incidents for closure and reporting to management as per the WHS management review procedure.

41. The Associate Director WEG will include the system failures in the internal audit schedule as per the WHS audit procedure to ensure system changes are effective.

Training and competency requirements

42. The facilitators of incident investigations will have training in incident analysis techniques such as 5 whys, ICAM™ or Taproot™.

Sources

<table>
<thead>
<tr>
<th>Legal and other requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Work Health and Safety Act 2011</em> (Cth)</td>
</tr>
<tr>
<td><em>Work Health and Safety Regulations 2011</em> (Cth)</td>
</tr>
<tr>
<td><strong>Safety, Rehabilitation and Compensation Act 1988</strong>(Cth)</td>
</tr>
<tr>
<td>---------------------------------------------------------</td>
</tr>
<tr>
<td><strong>AS/NZ 4801:2001 Occupational health and safety management systems</strong></td>
</tr>
<tr>
<td><strong>ISO 19011:2002 Guidelines for auditing management systems</strong></td>
</tr>
</tbody>
</table>
This procedure describes how the Australian National University (ANU) investigates, reports and takes action when incidents and events (referred to in this procedure as incidents) occur following injuries, illness, hazards and other system failures with a potential to impact on health and safety.