

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

Purpose:

The purpose of these procedures is to ensure that every *incident*, defined as any event that requires investigation, either due to the harm it has caused to people, the environment, or property, or due to the potential that it could have caused such harm, is investigated and reported appropriately and evaluated for potential lessons. In addition, this procedure will be used to fulfill any legal requirements, ensure compliance to applicable safety regulations, and facilitate the timely processing of workers compensation, insurance and other third party claims.

Scope:

These procedures cover three types of work-related incidents:

1. Life-threatening injuries or illnesses
2. Non life-threatening injuries or illness / first aid
3. Non-injury incidents, including close calls and near hits/near misses

Applicability

These procedures apply to everyone at Community First Developments Inc/ Comfield Property Management, employees, visitors, users, and subcontractors, involved in an incident.

Policy No.	Page - of -
Accident Investigation Procedure	
Revised: June 2010	Effective date: June 2010
Supersedes:	

Injury Response and Investigation Procedure

1. Life-threatening Injury or illnesses or Fatality

A life-threatening injury or illness requires a quick appropriate medical response and may require one or more types of in-depth investigation, as indicated below.

Step	Person	Action
1.	Person observing the incident / reporting party / injured person	Calls 911 Then calls Human Resources at 416-932-2670 x 109 (from an external phone) Then notifies the Site responsible person as follows. Employees: notify manager/supervisor Subcontractors: Notify site supervisor
2.	Site Manager/Supervisors and/or Senior Property Manager	<ul style="list-style-type: none"> ▪ Contacts Site Personnel, Human Resources ▪ Immediately attends workplace incident with investigation documentation
3.	Human Resources	<ul style="list-style-type: none"> ▪ Immediately attends workplace incident with investigation documentation ▪ Notifies responders based on incident particulars, such as emergency medical responders, Senior Property Manager, Senior Directors, Legal, Ministry of Labour ▪ Coordinates investigation and reporting process ▪ Determines investigation requirements and coordinates allocation of resources, including correspondence with legal, Ministry of Labour, and other third party intervention ▪ Ensures completion of documentation within time lines
4.	Responsible person on scene (supervisor / manager)	<ul style="list-style-type: none"> ▪ Stops all work in the immediate area ▪ Secures work scene where possible ▪ Helps guide responders to the scene
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From this point forward the procedure is the same as for a non-life threatening procedure in the next section, beginning with step 5.		

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

2. Non Life-threatening Injuries /Illness - First-aid Initial Response

Non life-threatening injuries/illness may require immediate medical attention to first aid responses, and may include injuries such as broken bones, cuts, bruises strains/sprains forms of physical assault/injury, or other physiological response due to exposure to chemical or biological agents.

Step	Person	Action
1.	Injured (or reporting) person	<p>Employee: Immediately notifies manager/supervisor</p> <p>Subcontractor: Informs Site manager/ supervisor Note: In addition, must follow own employer's procedures for employer notification</p>
2.	Injured person's supervisor	<p>Ensures that the injured person gets immediate medical help and that the injury is reported</p> <ul style="list-style-type: none"> ▪ Calls 911 and/or ▪ Administers First Aid and/or ▪ Requests injured person to report to nearest appropriate medical facility, even if no medical services will be sought; provides individual with Functional Abilities form for completion by medical practitioner, and/or <p>Note: It is strongly recommended that the supervisor or alternate accompany the injured person to Medical.</p>
3.	Responsible person on scene (supervisor / manager or other as determined by supervisor/manager)	<ul style="list-style-type: none"> ▪ Stops all work in the immediate area as necessary ▪ Secures work scene where possible ▪ Helps guide responders to the scene as necessary ▪ Contacts Human Resources and follows directives regarding investigative process
4.	Medical (Third Party)	<p>Makes first medical determination of injury, as required by the circumstance or requested by injured person, and provides initial treatment. Is provided with Functional Abilities Form (FAF) by Employee or Manager for completion.</p> <p>Completes WSIB forms for direct submission.</p>
5.	Injured person	<p>Employees: Completes WSIB Form 6; provides completed FAF as soon as medically possible and cooperates with Management in completing the investigation process.</p>

Policy No.	Page - of -
Accident Investigation Procedure	
Revised: June 2010	Effective date: June 2010
Supersedes:	

		Subcontractor: Completes WSIB Form 6; provides completed FAF as soon as medically possible and cooperates with Management in completing the investigation process.
6.	Site Manager	Initiates and/or participates in Investigation process as directed by HR Prepares Accident/Incident report; collects witness statements; completes WSIB documentation. Forwards documentation to HR
7.	Human Resources	<ul style="list-style-type: none"> ▪ May attend work place and coordinate investigation process as necessary ▪ Reviews investigation documentation; forwards WSIB documentation; Coordinates Return to work arrangements; ▪ Ensures all documentation is appropriate third parties ▪ Within required timelines ▪ Reviews documentation; results and corrective action with management team and coordinates implementation of corrective action with site management

3. Non-injury Incident, Close Call, and Near Hit/Miss Investigation Procedure

All non-injury incidents, close calls, and near hit incidents are investigated as described in this section.

- A non-injury incident is any event that requires investigation due to the harm it has caused to the environment or the broader community, or property.
- A close call is an incident that did not result in property damage greater than \$5,000 or cause bodily harm, but had the potential to do so.

Policy No.	Page - of -
Accident Investigation Procedure	
Revised: June 2010	Effective date: June 2010
Supersedes:	

- A near hit (or near miss) is an incident in which no barrier or only one barrier prevented an event from having a potential for property damage or causing bodily harm. May include threats for potential violence where individuals perceive potential for physical injury/harm.

Close calls and near hits will be investigated and will supply investigative resources to cases with the greatest potential for learning value.

Step	Person	Action
1.	Person observing the incident, close call, or near hit	Informs site supervisor or senior property manager
2.	Site Supervisor/ Senior Property Manager	<ul style="list-style-type: none"> ▪ Notifies appropriate responders as necessary such as Fire Department, Police , Human Resources; third party contractors (ie Consumers Gas re gas leak etc); ▪ arranges to evacuate building as necessary ▪ Prepares Accident/Incident report; collects witness statements; ▪ Forwards documentation to HR
3.	Human Resources	<ul style="list-style-type: none"> ▪ May attend work place and coordinate investigation process as necessary ▪ Reviews investigation documentation; ▪ Ensures all documentation is appropriate third parties ▪ Within required timelines ▪ Reviews documentation; results and corrective action with management team and coordinates implementation of corrective action with site management ▪ Provides incident to Senior Management

Investigation Participants

Depending on the severity and complexity of the incident, the investigation will be conducted in cooperation with Site and Senior management, Human Resources, Joint Health & Safety committee (as required) legal, representatives of local government (including but not limited to Police, Ministry of Labour representatives) and outside experts as determined by the Human Resources representative.

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

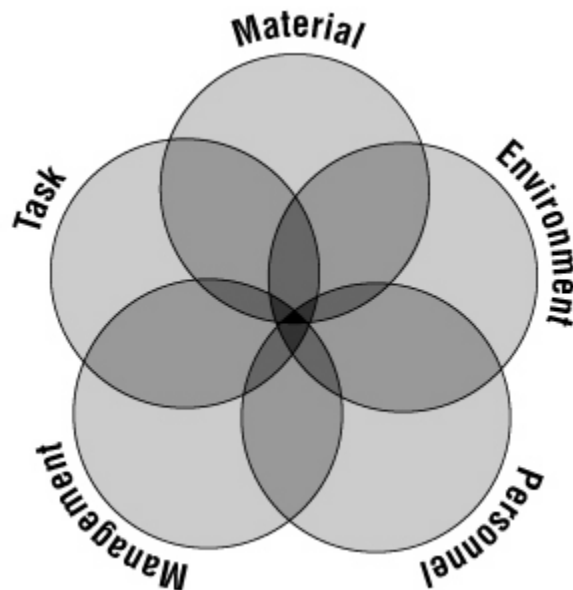
Investigating Steps

As little time as possible should be lost between the moment of an accident or near miss and the beginning of the investigation. In this way, one is most likely to be able to observe the conditions as they were at the time, prevent disturbance of evidence, and identify witnesses. The tools that members of the investigating team may need (pencil, paper, camera, film, camera flash, tape measure, etc.) should be immediately available so that no time is wasted.

What should be looked at to complete the Accident/Incident Reporting Form?**Accident Causation Models**

The simple model shown in Figure 1 attempts to illustrate that the causes of any accident can be grouped into five categories - task, material, environment, personnel, and management. When this model is used, possible causes in each category should be investigated. Each category is examined more closely below. Remember that these are *sample* questions only: no attempt has been made to develop a comprehensive checklist.

Figure 1: Accident Causation



Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

Task

Here the actual work procedure being used at the time of the accident is explored. Members of the accident investigation team will look for answers to questions such as:

- Was a safe work procedure used?
- Had conditions changed to make the normal procedure unsafe?
- Were the appropriate tools and materials available?
- Were they used?
- Were safety devices working properly?
- Was lockout used when necessary?

For most of these questions, an important follow-up question is "If not, why not?"

Material

To seek out possible causes resulting from the equipment and materials used, investigators might ask:

- Was there an equipment failure?
- What caused it to fail?
- Was the machinery poorly designed?
- Were hazardous substances involved?
- Were they clearly identified?
- Was a less hazardous alternative substance possible and available?
- Was the raw material substandard in some way?
- Should personal protective equipment (PPE) have been used?
- Was the PPE used?
- Were users of PPE properly trained?

Again, each time the answer reveals an unsafe condition, the investigator must ask **why** this situation was allowed to exist.

Environment

The physical environment, and especially sudden changes to that environment, are factors that need to be identified. The situation at the time of the accident is what is important, not what the "usual" conditions were. For example, accident investigators may want to know:

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

- What were the weather conditions?
- Was poor housekeeping a problem?
- Was it too hot or too cold?
- Was noise a problem?
- Was there adequate light?
- Were toxic or hazardous gases, dusts, or fumes present?

Personnel

The physical and mental condition of those individuals directly involved in the event must be explored. The purpose for investigating the accident is **not** to establish blame against someone but the inquiry will not be complete unless personal characteristics are considered. Some factors will remain essentially constant while others may vary from day to day:

- Were workers experienced in the work being done?
- Had they been adequately trained?
- Can they physically do the work?
- What was the status of their health?
- Were they tired?
- Were they under stress (work or personal)?

Management

Management holds the legal responsibility for the safety of the workplace and therefore the role of supervisors and higher management and the role or presence of management systems must always be considered in an accident investigation. Failures of management systems are often found to be direct or indirect factors in accidents. Ask questions such as:

- Were safety rules communicated to and understood by all employees?
- Were written procedures and orientation available?
- Were they being enforced?
- Was there adequate supervision?
- Were workers trained to do the work?
- Had hazards been previously identified?
- Had procedures been developed to overcome them?
- Were unsafe conditions corrected?
- Was regular maintenance of equipment carried out?
- Were regular safety inspections carried out?

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

This model of accident investigations provides a guide for uncovering all possible causes and reduces the likelihood of looking at facts in isolation. Some investigators may prefer to place some of the sample questions in different categories; however, the categories are not important, as long as each pertinent question is asked. Obviously there is considerable overlap between categories; this reflects the situation in real life. Again it should be emphasized that *the above sample questions do not make up a complete checklist, but are examples only.*

How are the facts collected?

The steps in accident investigation are simple: the accident investigators gather information, analyze it, draw conclusions, and make recommendations. Although the procedures are straightforward, each step can have its pitfalls. As mentioned above, an open mind is necessary in accident investigation: preconceived notions may result in some wrong paths being followed while leaving some significant facts uncovered. All possible causes should be considered. Making notes of ideas as they occur is a good practice but conclusions should not be drawn until all the information is gathered.

Injured workers(s)

The most important immediate tasks--rescue operations, medical treatment of the injured, and prevention of further injuries--have priority and others must not interfere with these activities. When these matters are under control, the investigators can start their work.

Physical Evidence

Before attempting to gather information, examine the site for a quick overview, take steps to preserve evidence, and identify all witnesses. In some jurisdictions, an accident site must not be disturbed without prior approval from appropriate government officials such as the coroner, inspector, or police. Physical evidence is probably the most non-controversial information available. It is also subject to rapid change or obliteration; therefore, it should be the first to be recorded. Based on your knowledge of the work process, you may want to check items such as:

- positions of injured workers
- equipment being used
- materials or chemicals being used
- safety devices in use
- position of appropriate guards
- position of controls of machinery

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

- damage to equipment
- housekeeping of area
- weather conditions
- lighting levels
- noise levels
- time of day

It is recommended that photographs are taken before anything is moved, both of the general area and specific items. Later careful study of these may reveal conditions or observations missed previously. Sketches of the accident scene based on measurements taken may also help in subsequent analysis and will clarify any written reports. Broken equipment, debris, and samples of materials involved may be removed for further analysis by appropriate experts. Even if photographs are taken, written notes about the location of these items at the accident scene should be prepared.

Eyewitness Accounts

Although there may be occasions when you are unable to do so, every effort should be made to interview witnesses. In some situations witnesses may be your primary source of information because you may be called upon to investigate an accident without being able to examine the scene immediately after the event. Because witnesses may be under severe emotional stress or afraid to be completely open for fear of recrimination, interviewing witnesses is probably the hardest task facing an investigator.

Witnesses should be kept apart and interviewed as soon as possible after the accident. If witnesses have an opportunity to discuss the event among themselves, individual perceptions may be lost in the normal process of accepting a consensus view where doubt exists about the facts.

Witnesses should be interviewed alone, rather than in a group. You may decide to interview a witness at the scene of the accident where it is easier to establish the positions of each person involved and to obtain a description of the events. On the other hand, it may be preferable to carry out interviews in a quiet office where there will be fewer distractions. The decision may depend in part on the nature of the accident and the mental state of the witnesses.

In all cases, a witness statement form must be completed and signed by the witness and investigator. A copy of the statement may be provided to the witness and the original must be provided to Human Resources.

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

Interviewing

Interviewing is an art that cannot be given justice in a brief document such as this, but a few do's and don'ts can be mentioned. The purpose of the interview is to establish an understanding with the witness and to obtain his or her own words describing the event:

DO...

- put the witness, who is probably upset, at ease
- emphasize the real reason for the investigation, to determine what happened and why
- let the witness talk, listen
- confirm that you have the statement correct
- try to sense any underlying feelings of the witness
- make short notes or ask someone else on the team to take them during the interview
- ask if it is okay to record the interview, if you are doing so
- close on a positive note

DO NOT...

- intimidate the witness
- interrupt
- prompt
- ask leading questions
- show your own emotions
- jump to conclusions

Ask open-ended questions that cannot be answered by simply "yes" or "no". The actual questions you ask the witness will naturally vary with each accident, but there are some general questions that should be asked each time:

- Where were you at the time of the accident?
- What were you doing at the time?
- What did you see, hear?
- What were the environmental conditions (weather, light, noise, etc.) at the time?
- What was (were) the injured worker(s) doing at the time?
- In your opinion, what caused the accident?
- How might similar accidents be prevented in the future?

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

If you were not at the scene at the time, asking questions is a straightforward approach to establishing what happened. Obviously, care must be taken to assess the credibility of any statements made in the interviews. Answers to a first few questions will generally show how well the witness could actually observe what happened.

Another technique sometimes used to determine the sequence of events is to re-enact or replay them as they happened. Obviously, great care must be taken so that further injury or damage does not occur. A witness (usually the injured worker) is asked to reenact in slow motion the actions that preceded the accident.

Background Information

A third, and often an overlooked source of information, can be found in documents such as technical data sheets, health and safety committee minutes, inspection reports, company policies, maintenance reports, past accident reports, formalized safe-work procedures, and training reports. Any pertinent information should be studied to see what might have happened, and what changes might be recommended to prevent recurrence of similar accidents.

Analysis and Corrective Action

At this stage of the investigation most of the facts about what happened and how it happened should be known. This has taken considerable effort to accomplish but it represents only the first half of the objective. Now comes the key question--why did it happen? To prevent recurrences of similar accidents, the investigators must find all possible answers to this question.

You have kept an open mind to all possibilities and looked for all pertinent facts. There may still be gaps in your understanding of the sequence of events that resulted in the accident. You may need to reinterview some witnesses to fill these gaps in your knowledge.

- When your analysis is complete, write down a step-by-step account of what happened (your conclusions) working back from the moment of the accident, listing all possible causes at each step. This is not extra work: it is a draft for part of the final report. Each conclusion should be checked to see if:
 - it is supported by evidence
 - the evidence is direct (physical or documentary) or based on eyewitness accounts, or
 - the evidence is based on assumption.

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

This list serves as a final check on discrepancies that should be explained or eliminated.

Why should recommendations be made?

The most important final step is to come up with a set of well-considered recommendations designed to prevent recurrences of similar accidents. Once you are knowledgeable about the work processes involved and the overall situation in your area, it should not be too difficult to come up with realistic recommendations. Recommendations should:

- be specific
- be constructive
- get at root causes
- identify contributing factors

Resist the temptation to make only general recommendations to save time and effort.

For example, you have determined that a blind corner contributed to an accident. Rather than just recommending "eliminate blind corners" it would be better to suggest:

- install mirrors at the northwest corner of building X (specific to this accident)
- install mirrors at blind corners where required throughout the worksite (general)

Never make recommendations about disciplining a person or persons who may have been at fault. This would not only be counter to the real purpose of the investigation, but it would jeopardize the chances for a free flow of information in future accident investigations.

In the unlikely event that you have not been able to determine the causes of an accident with any certainty, you probably still have uncovered safety weaknesses in the operation. It is appropriate that recommendations be made to correct these deficiencies.

The Written Report

The Accident/Incident form and Witness Statement form(s) must be completed within 24 hours of an incident arising or from the time that an awareness of an incident arose. In cases, where a fatality or critical injury has occurred the completion of the written report will be coordinated by Human Resources and/or alternate as determined by the Human Resources Representative.

Accident Investigation Procedure

Revised: June 2010

Effective date: June 2010

Supersedes:

In such circumstances, the Human Resources Representative will coordinate the appropriate reporting to Ministry of Labour within the timelines as defined in the Occupational Health & Safety Act.

The above procedures are provided to assist management in the timely, accurate completion of a Workplace Accident/Incident. Where managers have questions, concerns relating to the investigation process, and documentation process, they should direct their enquiries to Human Resources before finalizing any documentation.

Management is responsible for acting on the recommendations in the accident investigation report. The health and safety committee, if applicable, can monitor the progress of these actions.

Follow-up actions include:

Respond to the recommendations in the report by explaining what can and cannot be done (and why or why not).

- Develop a timetable for corrective actions.
- Monitor that the scheduled actions have been completed.
- Check the condition of injured worker(s).
- Inform and train other workers at risk.
- Re-orient worker(s) on their return to work.
- Update policies and procedures as appropriate and communicate changes to staff accordingly