

Garmong Construction Services					
<i>EMPLOYEE SAFETY POLICY HANDBOOK – Incident Management Plan</i>					
Last Revised:	January 25, 2012	By	Douglas Mahurin, MS, CSP	This Copy Printed:	1/25/2012 5:14:00 PM

Incident Management Program (IMP)

We believe that all occupational injuries and illnesses are preventable.

Purpose:

The purpose of this incident management program is to ensure incident response, notification, investigation, documentation, follow-up and the sharing of learnings is completed in a uniform, thorough and timely manner to prevent recurrence of a similar incident.

Scope:

This program applies to all incidents arising from any business operations, employees and contractors. All incidents will be investigated to the appropriate level with regards to incident severity.

Five main steps for the IMP:

- Response
- Notification
- Investigation
- Documentation
- Follow up and Sharing of Learnings

The Incident Management Process is designed to:

- To ensure workers are capable of recognizing and acknowledging when an incident has occurred
- To encourage notification of all incidents, with the understanding investigations are completed to identify facts not place blame.
- To ensure a thorough, consistent investigation of all incidents, to identify root causes which permit the development and implementation of appropriate corrective measures, eliminating the potential for reoccurrence.
- To facilitate continual performance improvement, to share key learnings and to prevent loss.

All incidents (Minor, Serious, Major, Critical) including near hits, must lead to the implementation of corrective and preventive measures to eliminate reoccurrence.

Response – Site Management will take the following actions:

- Acknowledge that an incident has occurred.
 - An incident is an unplanned event that results in undesirable consequences or an unplanned event
 - A near hit is an unplanned event that results in undesirable consequences or an unplanned event (incident) which, under slightly different circumstances, could have resulted in undesirable consequences.
- Complete an initial assessment of the incident to determine: what has occurred, who was involved, what is required to control the situation.
- Determine if emergency response is required. Initiate the emergency management system if the incident meets the definition of an emergency. An emergency is an unforeseen or imminent event which requires prompt coordination of resources, special communications and heightened lines of authority to protect the health, safety or welfare of people or to limit damage to property, company operations and the environment. If the incident is an emergency, then follow the emergency management process. If the incident is not an emergency, then continue following the incident management process.
- Determine and implement corrective action to eliminate further loss and to minimize potential exposures. Do not disturb the incident scene more than necessary to safely remove injured personal and shut down

Garmong Construction Services					
<i>EMPLOYEE SAFETY POLICY HANDBOOK – Incident Management Plan</i>					
Last Revised:	January 25, 2012	By	Douglas Mahurin, MS, CSP	This Copy Printed:	1/25/2012 5:14:00 PM

equipment still in operation. Secure the scene to prevent further incidents, identify sources of evidence, preserve evidence, meet legislative requirements, minimize environmental impacts. Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. Begin to document incident information in sequential order of events. Gather evidence which may assist in determining the immediate and root causes of the incident. This could include sketches, maps, photographs, measurements, videos, plot/site plans, etc. Record details immediately as the incident site may be subject to rapid change or destruction. Include details such as: potential witnesses, position of injured, position of equipment, position of materials, preventative devices in use, ergonomic conditions, environmental conditions, housekeeping, etc.

Notification – Site Management will take the following actions:

- Verbally notify appropriate individuals of the incident based upon incident event type and severity. Regardless of severity, employees must verbally notify their supervisor of all any incident. The senior on site management will report all incidents to the safety department and depending upon severity, the main office. The safety department will coordinate the notification process and inform owners, government authorities, etc. as necessary as soon as possible, but always within 24 hours.
- Written Incident notifications will follow within 24 hours. The PM will be responsible for written incident notifications coordinating with the site management.
- If the incident requires reporting to OSHA (fatality, catastrophe) the report will be made by the PM within 8 hours.

Investigation – Safety Director (SD) is responsible for coordinating all investigations

- The SD will determine if a detailed investigation is required. Investigations are required for all serious, major, and critical incidents and for incidents with the potential for the same severities. An initial sequence of events should be compiled immediately and an investigation should be completed within one week of the occurrence if possible.
- The SD will be responsible for putting the investigation team together with members as appropriate. The SD will delegate responsibilities as appropriate and secure the resources needed for a proper and complete investigation. The investigation team should include JB management, site management, site safety, craftsmen, and owner representatives, as appropriate.
- When collecting information, keep everyone at ease discussing the incident without placing blame, just gathering information. Make sure that all details are recorded properly and completely. Follow up interviews may be needed, make sure contact information is obtained for every witness. Interview the witnesses talking with everyone associated with the incident. Six basic questions to be asked of every witness include:
 - Who was injured?
 - What were the materials, machines, equipment, or conditions involved?
 - When did it happen?
 - Where did it happen?
 - Why did it happen?
 - How did it happen?
- Techniques used to help your interview include:
 - Conduct the interview at the scene.
 - Interview individuals separately in a private, neutral, non-threatening area.
 - Keep the interview positive.
 - Ask open-ended questions, not leading questions.
 - Do not talk down to the person or rush them to answer quickly.

Garmong Construction Services					
<i>EMPLOYEE SAFETY POLICY HANDBOOK – Incident Management Plan</i>					
Last Revised:	January 25, 2012	By	Douglas Mahurin, MS, CSP	This Copy Printed:	1/25/2012 5:14:00 PM

- Paraphrase what people tell you to make sure you understand what they are saying.
- Watch for clues from the person's body language.
- Record a statement for each witness, have them sign it, and give them a copy as soon as possible.
- Thank the person, and ask them to come back if they think of anything to add.
- Evaluate historical data. Obtain relevant information from analysis of the conditions at the time of the incident, of from prior records such as technical data sheets, maintenance reports, past incident reports, training records, work schedules, planning schedules, work practices, and procedures, etc.
- Define the sequence of events which provides information on what happened. Determine the chronological order of the events pre-incident and post-incident.
- Determine the immediate causes by identifying the conditions and circumstances of the event. Identify which of the conditions became an immediate cause of the event. Immediate causes are often described as the substandard practices and/or behaviors and substandard conditions that preceded the incident. It is important to note that there are too many conditions identified for a particular event, the event described is too broad and should be broken down into several discreet events.
- Determine Root Causes which are normally several factors that have impacted the event to lead to the end result. The method of incident investigations to analyze the immediate causes to identify the root causes. Root Cause is normally defined as underlying prime reason why an incident occurred. There are a number of tools and techniques available to assist in identifying root causes. The safety manager will select the proper tools based upon the nature of the investigation.
- Develop an action plan to address appropriate corrective actions that are identified as corrective actions for the root and immediate causes. Recommendations can include interim actions and corrective/preventive actions that are more permanent. Ensure that the corrective actions describe the specific action to be taken, who will implement the actions, and a timeline for the corrective actions to be completed, who will verify the corrective actions should that be necessary. Assess the actual costs associated with the incident and confirm the severity. The severity may change based upon the actual costs of the incident. Refer to the classification guide to confirm the incident classifications.
- The Safety Department is responsible for ensuring the proper equipment is available for the investigation to include but not limited to: cameras, PPE, measurement equipment, pens, rulers, small tools, audio recorder, flags, equipment manuals, etc.

Documentation – Safety Director is responsible for accumulating all documentation

- Identify and document learning's
- Meet with individuals involved in the incident investigation and identify and document any information learned through the investigation process that may prevent a similar incident from occurring. Update initial incident reports as required. It is the responsibility of the SD to ensure that the incident reports are reported accurately.
- The SD will ensure that a written incident summary report is prepared and distributed. The report will include:
 - The incident report form
 - Detailed narrative statement concerning the contributing events
 - Methodology – if appropriate
 - Investigation team member names
 - Narrative of the event
 - Findings and recommendations
 - Photographs, witnesses, statements, drawings, etc.
- Review the incident report with all persons involved to ensure accuracy of the report.

Garmong Construction Services					
<i>EMPLOYEE SAFETY POLICY HANDBOOK – Incident Management Plan</i>					
Last Revised:	January 25, 2012	By	Douglas Mahurin, MS, CSP	This Copy Printed:	1/25/2012 5:14:00 PM

Follow Up and Sharing of Learnings – Safety Director is responsible for coordinating the follow up actions.

- The investigation will result in identifying corrective actions to prevent the incident from occurring again.
- Identify person/company responsible for implementation of each recommendations from the investigation
- Provide status of the implementation of recommendations
- Confirm that all corrective actions have been completed.
- Gather any additional information
- Issue final incident report.
- Share the information with the active work crews and the JB management.

Training-

- The Safety Director has been trained on root cause analysis techniques (*Taproot*) and will maintain proficiency in that area.
- The Safety Department will conduct training for management and selected craftsmen on proper incident investigation techniques and their roles and responsibilities in incident response and investigation. First Aid training and investigation techniques training will be conducted at least every two years.