

# **Quick Guide to Incident Investigation and Reporting for Employers**



Use this guide when completing the Employer Incident Investigation Four-Part Report, in conjunction with the requirements of the *Workers Compensation Act* (the *Act*), Part 3 Division 10, and the interim prevention policies D10-175-1 and D10-176-1.

Depending on the incident, the *Act* requires the employer to complete up to four separate reports, each of which represents the status of the investigation at a specific point in the investigation process. See "What types of reports are employers required to prepare?" for details.

Employers can document their incident investigations in a manner that suits their needs. Regardless of the reporting format used, the report must contain the information required by WorkSafeBC Prevention Policies D10-175-1 & D10-176-1 in order to comply with sections 175 (2)(a) and 176 (2)(a) of the *Act*.

For your convenience, WorkSafeBC has developed two methods of recording incident investigations that employers may use if they do not wish to develop their own form. The first option is to use the four-part report form to complete all report types using one form. The second option is to use individual reports specifically tailored for each report type.

The report forms are available in two formats: PDF and MS Word. The PDF format is dynamic and you can type in the fields; however, it can't be customized with additional fields. In that case, you'll need to record supplementary information on a separate document and append it to the report form. The fields are also dynamic in the MS Word format and you can type in them. Additionally, you may wish to customize the form by adding a company logo, more fields for tracking/categorizing incidents, or (in the case of complex or large investigations) more rows in different sections. If you are familiar working with MS Word forms, you can unlock the report form (no password required) and make revisions to suit your business needs.

**Important:** These reports contain the minimum required content to satisfy the *Act*. If you choose to customize any report forms, you may add fields but you cannot delete any of the current fields.

To view and download the report forms, visit worksafebc.com/Topics/AccidentInvestigations/Resources.

#### When is an investigation required (section 173 of the Workers Compensation Act)?

Employers are required to immediately undertake an investigation into any accident or other incident that involves:

- Serious injury to or death to a worker
- Major structural failure or collapse
- Major release of hazardous substances
- Blasting accident causing personal injury
- Dangerous incident involving explosives, whether or not there is personal injury
- Diving incident, as defined by regulation
- Injury requiring medical treatment
- Minor injury or no injury but had potential for causing serious injury

Employers must conduct both a preliminary investigation and a full investigation.

#### What are the timelines to conduct the investigation?

Employers must immediately undertake the preliminary investigation and complete a preliminary investigation report within 48 hours of the incident. Employers must undertake the full investigation and then submit the full investigation report to WorkSafeBC within 30 days of the incident, unless WorkSafeBC grants an extension.

Depending on the complexity of the incident, an employer may complete its full investigation report within 48 hours.

The 48 hour period can be extended if it expires on a Sunday or other holiday, or it expires on a day the employer is not normally open.

#### Who should conduct incident investigations?

Incidents must be investigated by people who are knowledgeable about the type of work involved at the time of the incident. If reasonably available, investigations must be carried out with the participation of an employer representative and a worker representative.

## What types of reports are employers required to prepare?

Employers are required to prepare the following four reports:

- 1. A preliminary investigation report (within 48 hours of the incident)
- 2. An interim corrective action report that addresses the findings of the preliminary investigation
- 3. A full investigation report (within 30 days of the incident)
- 4. A full corrective action report that addresses the findings of the full investigation

# If you use report forms available from WorkSafeBC, what sections need to be completed and who receives copies of each report?

It depends whether you prefer to use individual reports for each of the four investigative periods or one fourpart report. If you choose the four-part report, please note that you complete sections and then update them as you work through the investigative process. Refer to the following chart to assist you in the reporting process:

Investigation Period	If using individual reports, complete an:	If using the Incident Investigation Four-Part Report:	What do I do with the form once I've completed it?
Preliminary investigation	Incident Investigation Report 1: Preliminary Report	Complete sections 1, 2, and 4	<ul> <li>Submit to WorkSafeBC, if requested</li> <li>Employer can choose to provide a copy of the preliminary investigation report to the OHS committee or worker OHS representative, or post at the workplace. See Privacy Considerations below.</li> </ul>
Interim corrective action	Incident Investigation Report 2: Interim corrective action report	Update section 4	Provide to your OHS committee or OHS worker representative. If there is no joint committee or worker OHS representative, post at the workplace. See Privacy Considerations below.
Full investigation	Incident Investigation Report 3: Full Report	<ul> <li>Update sections 2 and 4</li> <li>Complete section 3</li> </ul>	Submit to WorkSafeBC     Employer can choose to provide a copy of the full investigation report to the OHS committee or worker OHS representative, or post at the workplace. See Privacy Considerations below.
Full corrective action	Incident Investigation Report 4: Full Corrective Action Report	Update section 4	Provide to your OHS committee or worker OHS representative. If there is no joint committee or worker OHS representative, post at the workplace. See Privacy Considerations below.

## **Privacy Considerations**

Be mindful of the personal privacy of individuals involved in the incident; only record personal information relevant to the investigation.

If relevant personal information is included in the report, consider the need to remove some, or all, of it prior to posting the report in a public place, if posting is required or useful.

#### What is the purpose of the preliminary investigation and what must be included?

In the preliminary investigation, employers must identify any unsafe conditions, acts, or procedures — as far as possible — in order to ensure that work can be continued or resumed safely during the interim period between the incident and the conclusion of the full investigation. Refer to the chart on page 2 for reporting requirements.

# What is the purpose of the interim corrective action investigation and what must be included?

During the interim period — that is, until the full investigation is completed — employers must take all actions reasonably necessary to prevent a recurrence. If an employer is only able to identify some, or only able to identify in broader or more general terms, the unsafe conditions, acts, or procedures that significantly contributed to the incident, the interim corrective action may include a full or partial shutdown of a worksite, removing equipment, or reassigning workers. Refer to the chart on page 2 for reporting requirements.

#### What is the purpose of the full investigation and what must be included?

In the full investigation, employers must determine the cause or causes of the incident. "Determining the cause or causes" means analyzing the facts and circumstances of the incident to identify the underlying factors that led to the incident. This includes identifying the underlying factors that made the unsafe conditions, acts, or procedures possible and identifying health and safety deficiencies. Refer to the chart on page 2 for reporting requirements.

#### What is the purpose of the full corrective action investigation and what must be included?

Once the full investigation is completed, the employer must prepare a corrective action report that identifies:

- The unsafe conditions, acts, or procedures that made the corrective action necessary
- The corrective action(s) taken to prevent the recurrence of similar incidents following the full investigation
- The names and job titles of the persons responsible for implementing the corrective action(s) following the full investigation, and
- The date the corrective action(s) was taken
- The employer should at a suitable point after the full corrective actions have been implemented, review to determine if the corrective actions taken are effective

# Why is it important to investigate incidents that involve minor injury or no injury but potential for causing serious injury?

Who has not heard someone say, "It was only a matter of time before this happened." What does that mean? In many cases, it means that serious or catastrophic incidents were preceded by minor or close call incidents. Investigating incidents that involve minor injury or no injury, provides employers with an opportunity to identify health and safety issues that may be overlooked if an investigation is not completed. By scrutinizing and investigating these types of incidents, employers can identify and implement control measures to prevent similar or more serious incidents.

## How do you submit an incident investigation report to WorkSafeBC?

For preliminary incident reports requested by WorkSafeBC and full incident investigation reports required by Section 173 of the *Act*, please submit your paper form by fax or mail to:

Fax: 604.276.3247 (Greater Vancouver) Mail: WorkSafeBC

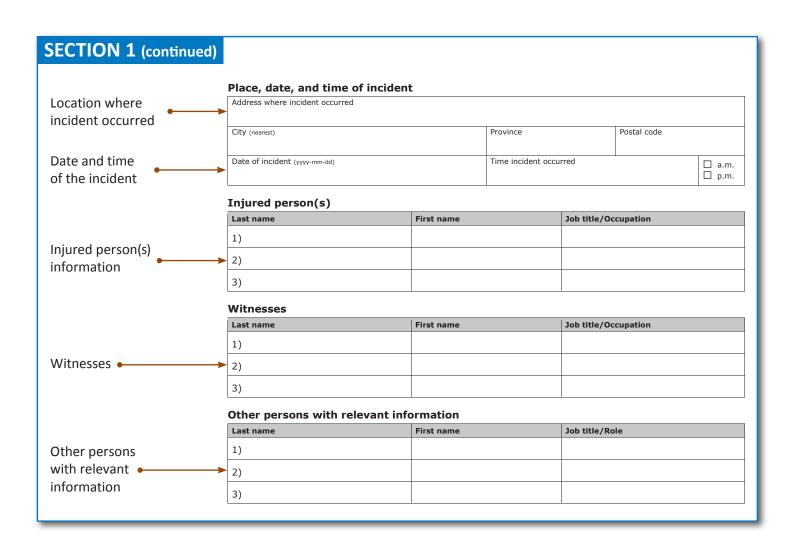
Toll-free 1.866.240.1434 P.O. Box 5350, Stn. Terminal

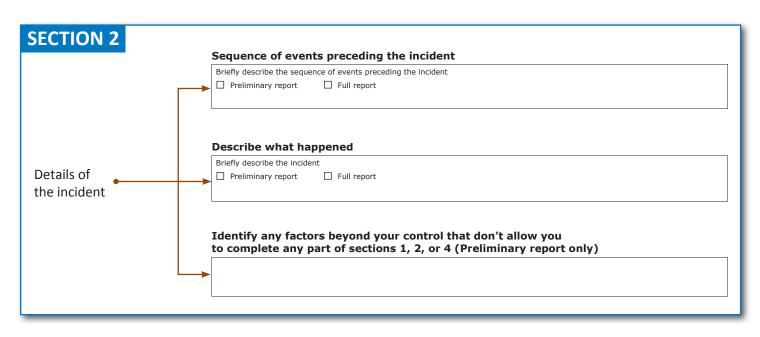
Vancouver, BC V6B 5L5

The next few pages provide a detailed orientation to the Employer Incident Investigation Four-Part Report. Please note that should you wish to use the individual reports (i.e., Reports 1-4), they are similar in function and design to the four-part report, and the same information is collected using either method.

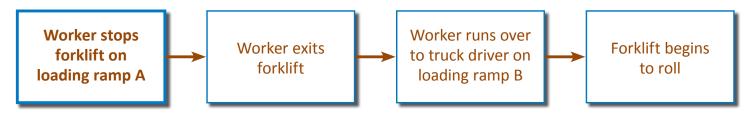
EMPLOYER INFORMATION						
	Employer's information					
	Employer's name	Employer's name				
Emplover	Employer's head office address					
Employer information	City	Province	Postal code			
	Employer's contact (name/phone/email)					

SECTION 1								
	Report stage							
The type of report being	Please select any or Preliminary report Report date (уууу-ти	ort	ective action report y-mm-dd)	Full report Report date (уууу-mm-dd)		ctive action report		
documented	Note: Save each re	nort senarately so you don	't overwrite and lose the	nrevious report				
	Note: Save each report separately so you don't overwrite and lose the previous report.							
	Type of occur							
Reason for	1. Please select an			and the state of the state of the second	alasta a suba a suba a su	his alternative data.		
conducting the •	☐ Serious injury to or death to a worker ☐ Dangerous incident involving explosives other than blasting incident involving explosives other than blasting incident involving explosives of the production of the p					blasting incident		
_	→ ☐ Major structural failure or collapse ☐ Diving incident, as defined by regulation							
investigation		hazardous substance		ry requiring medical treatme				
	☐ Blasting acciden	t causing personal injury	∐ Mino	r injury or no injury but had	d potential for caus	ing serious injury		
	2. If none of the ab	pove apply, don't submit the	s report to WorkSafeBC	. Instead, check one of the	following and keep	this report on file		
	☐ Minor injury (e.g.	., first-aid-only injury)	☐ Othe	er — required by company p	Olicy (specify)			
	Full Incident	Investigation Rep	ort copy to Wor	kSafeBC				
Employers must submit	See the companion <u>quick guide</u> for instructions to submit this form.							
a copy of their full •——	Is a full report required?		If	If yes, date submitted (yyyy-mm-dd)				
incident investigation	☐ Yes ☐ N	☐ Yes ☐ No						
reports to WorkSafeBC.								
reports to worksurebe.								
The names of the								
worker and employer								
representatives •	Persons cond	ucting investigation	on					
who conducted the	Representative	Name (please print)	Job title/Occu	nation Si	gnature (optional)	Date signed		
investigation must be		(please print)	Job title/ occu	pation	griature (optional)	(yyyy-mm-dd)		
provided on the form. If	Employer							
the employer wishes to	Worker							
have these persons sign	Other							
the report, it must be	Examples of "other" include a knowledgeable person such as a worker, supervisor, or third party subject matter experts.							
· · · · · · · · · · · · · · · · · · ·								
printed and then signed,								
as the form will not								
accept digital signatures.								
Examples of "other"								
•								
include a knowledgeable								
person such as a worker,								
supervisor or third party								
subject matter experts.								
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#### Sequence of events diagram (sample)

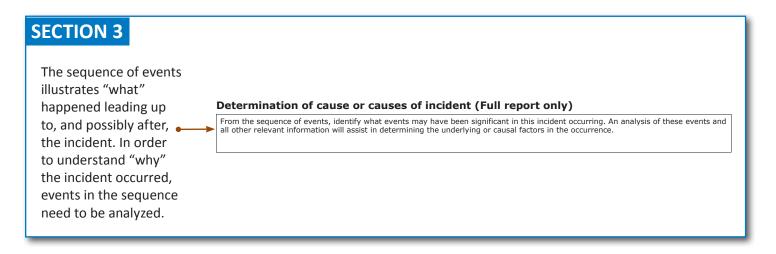


In describing what happened, a sequence of events should highlight all of the events prior to the incident. This may include events from the day of the incident, however, may also extend back to years prior (e.g., installation of new machinery, changing ownership of company, product changes, strategic decisions, policies and safe work procedures, etc). In addition, if activities which occurred after the incident, such as first aid or the evacuation process, need to be analyzed for future improvements you can include those events in your sequence.

When developing a sequence of events diagram, each event should:

- Indicate one action or decision (e.g., worker stops forklift on loading ramp A).
- Never include something that did NOT happen (e.g., worker should have, could have, would have, etc.), as these actions or decisions cannot be analyzed (e.g., worker should have parked on level ground).

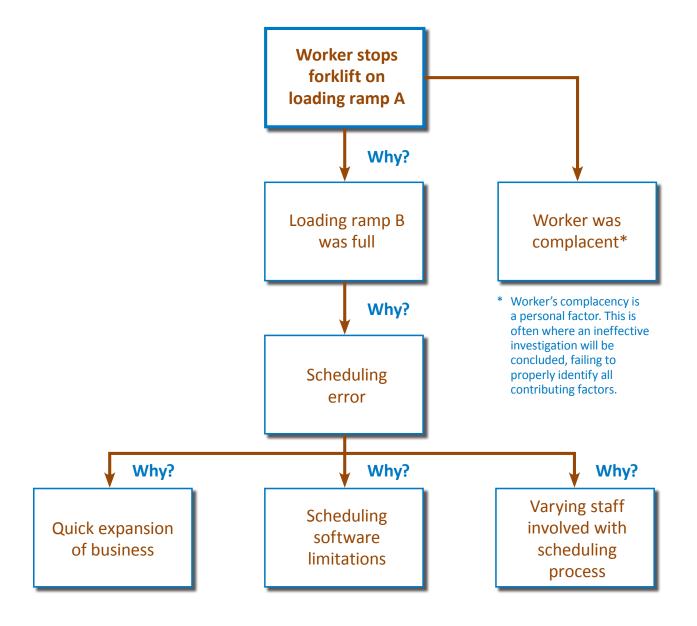
It is helpful to include the date and time of the action/decision.



#### When analyzing:

- 1. Choose events that in some manner contributed to the incident occurring. In the example above, one event has been selected for further analysis. This event is shown in **bold**.
- 2. The analysis then involves asking "why" repeatedly until you end up at a workplace factor (e.g., tools, equipment, process, procedures, environment, communication, etc.).
- 3. Avoid stopping at personal factors, such as "he/she was complacent," "he/she was not paying attention," and/or "he or she did not follow procedures," as the limited analysis reduces opportunities to improve workplace safety.
- 4. Ensure that your conclusions are based on information compiled during the investigation, and therefore are objective, and not based solely on one's personal opinion of the situation. Objective information will come from interviews, documentation, observations, analysis of equipment, etc.

### Analysis of an event (sample)



### **SECTION 4**

An incident investigation report should recommend corrective actions, to prevent a recurrence through identification and analysis of contributing or causal factors. Some points to remember when you are investigating:

- · Avoid focusing on what you feel the workers should have been able to anticipate. The goal of an investigation is to understand why the worker's actions made sense to them at the time. Understanding why it made sense to the worker will help to identify workplace factors need to be changed to prevent a recurrence.
- There is often more than one cause, or contributing factor, to an incident occurring. Drawing conclusions prematurely can limit the information you collect, thereby limiting your ability to identify all causes or contributing factors.
- Analyze the information until you identify workplace factors. Remember that stopping at personal factors limits the opportunity to improve workplace safety.

Place	date	and	time	of	incident
riace,	uate,	allu	unie	vı	IIICIGEIIC

	Address where incident occurred		
-	City (nearest)	Province	Postal code
	Date of incident (yyyy-mm-dd)	Time incident occurred	☐ a.m. ☐ p.m.

#### Identification of unsafe conditions, acts, or procedures and their underlying factors

$ Pre liminary \ report: \ List \ the \ unsafe \ conditions, \ acts, \ or \ procedures \ that \ significantly \ contributed \ to \ the \ incident. $

☐ Full report: List any additional unsafe conditions, acts, or procedures that significantly contributed to the incident and determine the cause of the incident. This may include the underlying factors for all unsafe conditions, acts, and procedures as well as other health and safety deficiencies.

#### **Corrective action**

Identify any corrective actions necessary to address unsafe conditions, acts, or procedures identified above in order to prevent similar incidents.

	Recommended corrective action	Interim or full corrective action	Action assigned to	or expected completion date (yyyy-mm-dd)
	1)	☐ Interim☐ Full		
<b>-</b>	2)	☐ Interim		
	3)	☐ Interim		
	4)	☐ Interim ☐ Full		

#### **Definitions**

**Sequence of events:** A chronology of actions/decisions leading up to, and possibly occurring after, an incident.

**Unsafe acts:** An unsafe act is an action, or lack of action, made in the presence of a hazard. For example, a worker uses a grinder without a guard, works on energized equipment without locking out, or doesn't wear PPE, etc.

**Unsafe conditions:** May include things like the work environment (e.g., congested work area, poor housekeeping, poor visibility) or equipment (e.g., lack of safeguarding, poor maintenance).

**Procedures:** When looking at the procedures, there are some important considerations:

- 1. Were procedures developed and available?
- 2. Were procedures utilized?
- 3. Were procedures applicable to the equipment, work task, etc.?
- 4. Were the procedures adequate to address hazards present?
- 5. Were the procedures understood?

Some of the questions that may come from the above considerations:

- Were the procedures written?
- How were the procedures communicated to the worker?
- Where is the procedural information kept?
- How long ago was the information communicated?
- Were the procedures understood by the worker (e.g., procedures provided in English to workers with English as a second language)?
- How do you know that the procedures were understood?
- What processes were in place to ensure procedures were followed (e.g inspection supervision)?
- Have there been any changes to the equipment, product, or work process since procedures were implemented? These changes may affect one's ability to continue to follow the procedures.
- Are there any maintenance issues with the equipment? Often, if machines are not maintained regularly, workers will adapt the way they perform their task in order to ensure the equipment continues to run.