



ADMINISTRATIVE PROCEDURE

SUBJECT: SAFETY EVENT REPORTING AND REVIEW PROCEDURE	Number <u>IX-9</u>	Effective Date: Issued: <u>09/30/2009</u> Revised: <u>09/30/2012</u> Revised: <u>02/22/2022</u>	Page 1 of 7
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PURPOSE:

The Safety Event Reporting and Review Procedure provides a systematic approach to safety event reporting and incident investigation to provide direct and prompt follow-up on safety issues, to have one destination for safety information so that it may be easily shared with all District employees, and to document concerns and corrective actions in order to continually improve the safety program. The goal of the program is to identify and fix the systems that may lead employees into unsafe conditions, situations or decisions.

When needed, a more comprehensive incident review will be completed for serious safety events. Serious safety events are generally defined as incidents by either scale of impact, complexity of causes, magnitude of importance of lessons and improvements or potential for conflicts of interest and requires an independent team of investigators. Serious events also include events relating to process safety management (PSM) covered processes. The PSM health and safety program outlines investigation procedures for those events, including a separate incident investigation form.

POLICY:

All safety events, including work-related injuries, vehicle accidents, close calls, concerns, suggestions, and observations, will be reviewed to determine root causes and recommendations will be developed, communicated, and implemented to prevent recurrence of the event. Safety recognition will be similarly reviewed and communicated as a safety event to encourage continued behavior.

ROLES AND RESPONSIBILITIES:

MANAGER OF HEALTH & SAFETY (MHS), or designee, is responsible to:

1. Timely review all safety events to assist supervisors in determining context, cause, consequence of the event and make recommendations for corrective actions.
2. Report all Cal/OSHA reportable injuries and illnesses, including hospitalization, transport of an employee via ambulance, or fatality to the local Cal/OSHA office within 8 hours.
3. Monitor corrective actions as appropriate to remedy unsafe working conditions, facilities, equipment, locations, or practices.

4. Ensure correct documentation and report the results of the event report, including findings and recommendations, to the District Safety Committee, the supervisor, superintendent or department manager(s) involved for their review.
5. Ensure District procedures and policies are updated by the responsible manager and that policies and procedures are updated to reflect improvements based on the findings or recommendations of the review.

MANAGERS are responsible to:

1. Immediately report all safety events to the MHS;
2. Participate in investigations of serious safety events as a member of the Incident Review Panel as assigned;
3. Review all safety events involving subordinates and implement corrective action and safety modification and/or employee training as recommended;
4. Regularly review the safety event report tracking and provide status updates on assigned corrective actions as required.

SUPERINTENDENTS/SUPERVISORS/CONTRACT ADMINISTRATORS are responsible to:

1. Immediately report all safety events to their Department Manager, perform an initial investigation, and timely submit safety event reports to the MHS within 24 hours for injury events and within 48 hours for all other safety events (note that while Contract Administrators are not responsible for contractor/consultant personnel safety, they must comply with this policy in reporting and investigating events).
2. Review all safety events involving subordinates and assess corrective action(s) and the need for safety modification and/or employee training.
3. Regularly review the safety event report tracking and provide status updates as requested.
4. Supervisors who receive safety event reports will use the following guidelines:
 - a. Initial review of the event should occur within 24 hours of notification of the event. The supervisor will determine the appropriate corrective actions in consultation with the MHS.
 - i. If an event results in the hospitalization of an employee, transport of an employee via ambulance, or fatality, the supervisor or department manager must notify the MHS immediately. The MHS must report the incident to the local Cal/OSHA office within 8 hours.

- b. This program is intended to be a positive way for all employees to participate in hazard identification and safety program improvements. Employees should be encouraged to report events and be appreciated for participating.
- c. Reporting of events is non-punitive. The goal of event reporting is to share information, improve jobsites, and catch small problems before they become larger, not to catch employees doing something wrong.
- d. Be aware of unintentionally negative responses to employees reporting events.
- e. Support employees with time and resources to address safety issues.
- f. Use reporting of events to review safety rules and procedures, identify training gaps, and assess/determine causes of events & address as appropriate.
- g. After receiving a report review the form to ensure its completeness, add any additional information that may be helpful, and send copy to MHS.
- h. Communicate facts of events to other supervisors or workgroups who may be exposed to the same hazard, typically via email. Communicate immediately if the hazard still exists following the incident and could put others in harm's way.

THE DISTRICT SAFETY COMMITTEE and SITE SAFETY COMMITTEES are responsible to:

1. Receive the safety event tracking report for review from the MHS, and as requested, assist with the incident review as members of the Incident Review Panel as requested by the Assistant General Manager – Engineering and O&M and as assigned by the Chair of the Safety Committee.
2. Communicate back to their represented workgroup all events and hazards applicable to their work.

ALL EMPLOYEES are responsible to:

1. Immediately inform supervisor of all safety events and participate in the incident review as required to meet the objectives of this administrative procedure.
2. Should there be any doubt to whether an incident be reported, employees should err on the side of proactive reporting and communication.

CONTRACTOR/CONSULTANT EVENTS

Where safety events involve District contractor or consultant forces, the focus of the safety event report is the District's role, responsibilities, and lessons in the incident (for example, reviewing how the District reviewed and enforced its contract requirements). The review is focused on learning and

communicating how the District can improve its safety culture such as through its safety procedures, policies, and District staff actions.

SAFETY EVENT REPORT:

1. This program is intended to be a positive way for all employees to participate in hazard identification and safety program improvements. Employees should be encouraged to report events and be appreciated for participating.
2. Reporting of events is non-punitive. The goal of event reporting is to share information, improve jobsites, and catch small problems before they become larger, not to catch employees doing something wrong.
3. The safety event report is a one-page form designed to capture and communicate all types of safety issues and concerns.
4. After the occurrence of any type of safety event (see event type definitions below), it is important to communicate the event and identify if any follow-up actions are needed. All types of safety events can be reported using the safety event report form.
5. The safety event report can be found on the Health & Safety SharePoint site, and paper copies are outside MHS office and on lunchroom bulletin boards. Instructions for completing the safety event report form can be found on the backside of the form.

EVENT REPORT TRACKING & FOLLOW-UP:

1. After receiving a safety event report, the MHS will enter information into the safety event report tracking document.
2. If follow-up is necessary, the MHS will assign it to an appropriate manager. Eminent hazards will require immediate follow-up to ensure safety of employees and the public.
3. Every event will be assigned to a site safety committee, District Safety Committee, or Safety Task Force. The committee will review the event and track corrective actions as necessary, including notifying the reporter and other involved employees on the progress and resolution of the event, as appropriate.

SERIOUS INCIDENT REVIEW:

1. All safety events are to be reviewed in a timely manner (review should begin within 24-hours) to determine the root cause(s) and contributing factors involved. The extent of the investigation depends on a number of factors including the severity or potential severity of the incident. "Serious incidents" should be further investigated utilizing an incident review panel and issuance of an incident review report.

- a. A serious incident is generally defined by either scale of impact, complexity of causes, magnitude of importance of lessons and improvements or potential for conflicts of interest and requires a more in-depth investigation of the event. The consequence or potential consequence of the failure does not determine the importance of the failure.
2. For all serious incidents, as determined by the Assistant General Manager – Engineering and O&M, an Incident Review Panel is assembled to investigate.
3. If during the safety incident review, it becomes evident that a violation of District policy may have occurred, the Department Manager will notify the Human Resources and Risk Manager of the violation, who conducts the appropriate evaluation and notifications required by District policy and Memorandums of Understanding.
 - a. The HR&R process will be conducted as a separate process after the safety incident review is completed.
 - b. The safety incident review is not a HR&R-led process and does not assess blame or need for personnel actions. Any HR&R led investigation collects its own relevant information and statements for its specific purpose of evaluating a potential District policy violation.

INCIDENT REVIEW PANEL

1. An Incident Review Panel assesses the nature of an event and identifies any applicable safety deficiencies which may exist. It also recommends revision to management systems, safety procedures, facility, or equipment modification, and/or safety training, where appropriate, to minimize similar incidents in the future.
2. The Incident Review Panel is comprised of the MHS, the manager or superintendent most closely connected with the specific safety incident, and an appropriate representative from the District Safety Committee and/or Site Safety Committee.
 - a. The Safety Committee Representative should be experienced or have knowledge or expertise relevant to the subject of the investigation and will be assigned by the Chair of the Safety Committee.
 - b. A subject matter expert may be selected to be part of the panel as well, for example, if the Safety Committee Representative(s) are not familiar with the operations related to the incident.
 - c. For events related to Process Safety Management covered processes (e.g., Ammonia and Chlorine), line employees must also participate in the review panel. See Process Safety Management Health and Safety Program for more information.

- d. The Panel is convened on an as-needed basis as determined by the Assistant General Manager – Engineering and O&M. The Incident Review Panel is recommended to review and determine findings for serious incidents that require a higher degree of experience, greater number of resources and a greater level of independence than a standard investigation by Supervisor/Superintendent/Contract Administrator.
3. The goal of the incident review process is not to seek to establish fault or blame. Instead, the goal is to explain the failure and identify defenses or corrective actions to implement to prevent the incident in the future. The three parts of the failure include:
 - a. The context: everything that led up to the actual failure event
 - b. The consequence: the failure itself
 - c. The retrospective understanding: everything that happened after the failure happens
4. The incident review process will include the following steps:
 - a. Gather facts. Including physical evidence, interviews with subject, victim, and witnesses, and review records, including email, photos, work order, training records, drawings/as-builts, policies and procedures.
 - b. Use facts to create an event timeline for before, during, and after the incident.
 - c. Conduct a root cause analysis with the team.
 - d. Identify patterns.
 - e. Correct and prevent issues.
5. The report format may vary based on the incident. However, at a minimum it should explore:
 - a. The explanation of the failure – should have a beginning, middle and end, have fidelity and move through time logically and sequentially.
 - b. Understand what went wrong and what went right.
 - c. Understanding of how some type of defense or defenses built into the organizational system were either not present, or if present for some reason failed.

REPORTING AND COMMUNICATION:

1. A status report on safety events will be regularly routed from the MHS to employees, typically through the monthly safety newsletter, for discussion at safety committee, staff, and safety tailgate meetings.
2. Supervisors' review of minor injury/incidents should also be discussed at safety tailgate or staff meetings.
3. Status reports on each safety event will be included in the safety event tracking log and is available to all employees on the Health & Safety SharePoint page.
4. Actions resulting from incident reviews will be tracked by the responsible manager and results will also be recorded and reviewable on safety event tracking log.
5. Department Heads/Division Managers are responsible for correcting any deficiencies found during the review process and communicating the incident review results to District staff.
6. The MHS is responsible for verifying that corrective action(s) is/are implemented. All safety events are tracked and communicated on the safety event report tracking log maintained by the MHS.
7. Records will be kept in accordance with the District's record retention schedule.

APPROVED:



Stephen J. Welch
General Manager

SJW/SRB:mlb