



ADMINISTRATIVE PROCEDURE

SUBJECT: SAFETY INCIDENT REVIEW PROCEDURE	Number <u>IX-9</u>	Effective Date: Issued: <u>09/30/09</u> Revised: <u>09/30/12</u>	Page 1 of 6
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PURPOSE:

The Safety Incident Review Procedure provides a systematic approach to safety incident investigation to determine initiating events, contributing events, root cause, and contributing causes. The incident reviews must identify appropriate recommendations that address the problems and identify root causes. These may include and are not limited to upgrading facilities, engineering controls, standard procedures and policies, personal protective equipment, and/or training for affected employees. Implementation of this procedure is intended to prevent and/or mitigate similar incidents and accidents in the future.

POLICY:

All safety incidents, including work-related injuries, accidents, regulatory violations, and near misses, will be reviewed to determine root causes, and recommendations will be developed, communicated, and implemented to prevent recurrence of the accident/incident. This procedure applies equally to District and District responsibilities for non-District personnel and equipment. All safety incidents, accidents, and near misses are included within the scope of this policy. (A near miss is a condition or an incident where but if not for a fortunate break in the chain of events, there is near certainty that an injury or property damage would have occurred).

ROLES AND RESPONSIBILITIES:

SAFETY OFFICER is responsible to:

1. Timely review all Cal-OSHA recordable injuries, vehicular accidents, accidents involving property damage, and near miss events to assess cause and prevention;
2. Monitor corrective actions as appropriate to remedy an unsafe working condition, facility, equipment, location or practice;
3. Ensure correct documentation and report the results of the incident review, including findings and recommendations, to the District Safety Committee, the department manager(s) involved, and the Assistant General Manager-Engineering for their review. Ensure report results have been adequately reviewed by key managers and supervisors prior to final issuance of report findings. (See "Reporting and Communication" for final distribution and website posting.)

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4. Ensure District procedures and policies are updated by the responsible manager and that Safe Practices Manuals are updated to reflect improvements based on the findings or recommendations of the review.

MANAGERS are responsible to:

1. Immediately report all accidents and near miss events to the Safety Officer;
2. Participate in investigations of serious incidents as a member of the Accident Review Panel as assigned (see "Accident Review Panel");
3. Review all accidents/injuries of subordinates and implement corrective action and safety modification and/or employee training as recommended by the incident review.

SUPERINTENDENTS / SUPERVISORS/CONTRACT ADMINISTRATORS are responsible to:

1. Immediately report all accidents and near miss events to their Department Manager, perform an initial investigation, and timely submit Accident/Injury Reports to the Safety Officer within 24 hours for injury accidents and within 48 hours for near misses (note that while Contract Administrators are not responsible for contractor/consultant personnel safety, they must comply with this policy in reporting and investigating as defined herein);
2. Review all accidents/injuries of subordinates and assess corrective action(s) and the need for safety modification and/or employee training.

THE DISTRICT SAFETY COMMITTEE and SITE SAFETY COMMITTEES are responsible to receive the safety incident review report for review from the Safety Officer, and as requested, assist with the incident review as members of the Accident Review Panel as requested by the Assistant General Manager – Engineering and as assigned by the Chair of the Safety Committee (see "Accident Review Panel").

ALL EMPLOYEES are responsible to immediately inform supervisors of all accidents, near miss events, unsafe conditions, unsafe equipment, and known unsafe practices, and participate in the incident review as required to meet the objectives of this administrative procedure. Should there be any doubt to whether an incident be reported, employees should err on the side of conservative reporting and communication.

INVESTIGATION PROCEDURES:

All safety incidents are to be reviewed in a timely manner (review should begin within one business day) 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 incidents.

DISTRICT FORCES

The employee's supervisor is responsible for performing an initial review within 24 hours to find out the root cause(s) of the incident, notifying and consulting with the Safety Officer as needed to complete the review and for correcting the situation, in consultation with the Safety Officer, to prevent its recurrence. The purpose of safety incident review is not to fix or find blame, but to identify the root cause and find preventative measures that can help to prevent future accidents. Attachment 1 provides a root cause analysis form to assist in the review process.

Upon notification of an accident or near miss, the supervisor in consultation with the Safety Officer as needed, must:

Supervisor Guidelines

Accident	Near Miss
<ul style="list-style-type: none"> • provide for immediate medical attention 	
<ul style="list-style-type: none"> • report the incident to the Safety Officer 	<ul style="list-style-type: none"> • report the incident to the Safety Officer
<ul style="list-style-type: none"> • assemble and complete necessary reporting and investigation forms 	<ul style="list-style-type: none"> • assemble and complete necessary reporting and investigation forms
<ul style="list-style-type: none"> • interview injured personnel and witnesses 	<ul style="list-style-type: none"> • interview witnesses
<ul style="list-style-type: none"> • examine the injured employee's work area including field evaluation, for causative factors 	<ul style="list-style-type: none"> • examine the employee(s) work area for causative factors
<ul style="list-style-type: none"> • review established procedures to ensure they are adequate and were followed 	<ul style="list-style-type: none"> • review established procedures to ensure they are adequate and were followed
<ul style="list-style-type: none"> • review training records of affected employees 	<ul style="list-style-type: none"> • review training records of affected employees
<ul style="list-style-type: none"> • determine all contributing causes to the accident 	<ul style="list-style-type: none"> • determine all contributing causes to the near miss

<ul style="list-style-type: none"> • for vehicle accident, and under \$2,000 damage and no personal injury 	<ul style="list-style-type: none"> •
<ul style="list-style-type: none"> • take corrective actions, to prevent the accident/exposure from reoccurring 	<ul style="list-style-type: none"> • take corrective actions to prevent recurrence
<ul style="list-style-type: none"> • record all findings and actions taken or to be taken 	<ul style="list-style-type: none"> • record all findings and actions taken or to be taken
<ul style="list-style-type: none"> • communicate “lessons learned” in safety training/meetings 	<ul style="list-style-type: none"> • communicate “lessons learned” in safety training/meetings
<p>Note: The guidelines listed provide a checklist for an initial investigation. Additional or modified steps should be used as appropriate to fit the case.</p>	

The supervisor’s initial findings and any immediate corrective actions must be documented on accident/injury forms and sent to the Safety Officer within 24 hours of notification of the accident. Near miss reports are sent to the Safety Officer within 48 hours. The supervisor shall determine appropriate corrective actions in consultation with the Safety Officer. It is important that information collected be objective, accurate and complete. A subject matter expert and/or an Accident Review Panel may be included in an incident review as needed to ensure an objective, accurate and complete review (see “Accident Review Panel”).

If an accident results in the hospitalization of an employee or fatalities, the supervisor or department manager must notify the Safety Officer immediately. The Safety Officer will lead the review (not the Supervisor/Superintendent/Contract Administrator) and must report the incident to the local Cal-OSHA office within 8 hours.

The Safety Officer will review each accident or injury report within 24 hours of receipt to ensure that the review was thorough, that all immediate corrective actions are completed, and that long-term follow-up actions are clearly defined with adequate schedule and resources for completion. Incident reviews and/or corrective actions that are incomplete will be routed back to the supervisor for further follow-up, with specific recommendations noted by the Safety Officer. Reviews should strive to clarify discrepancies and conflicts of information so to identify root causes. However, in the case of conflicts of information that cannot be resolved, all relevant information should be included in the review to ensure a complete perspective of the event. The supervisor, superintendent and/or manager will work with the Safety Officer to establish action deadlines. Corrective actions not implemented in a reasonable period of time as identified by the agreed deadline will be brought to the attention of the supervisor’s manager by the Safety Officer and to the Safety Committee.

CONTRACTOR/CONSULTANT FORCES

Where safety incident reviews involve District contractor or consultant forces, the focus of the incident review is on 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 not focused on the contractor’s safety procedures and policies. It 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. The review is to be conducted with the same approach, procedure and purpose as a District-forces review as defined above.

OTHER CONSIDERATIONS

For all serious incidents, as determined by the Assistant General Manager - Engineering, an Accident Review Panel (see "Accident Review Panel") is assembled to investigate. A serious incident is generally defined as an incident 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.

For vehicle accidents which have been determined to be avoidable, in a case of a first accident where no other disciplinary concerns are involved, the property damage is less than \$2,000, and there was no personal injury, in addition to the incident review process as outlined herein, the employee shall receive an oral reprimand from their supervisor. The oral reprimand will be documented by the supervisor.

If during the course of the safety incident review it becomes evident that a violation of District policy may have occurred, the Department Manager notifies the Human Resources – Risk Division Manager of the violation, who conducts the appropriate evaluation and notifications required by District policy and Memorandums of Understanding. The safety incident review is not a Human Resources led process, and does not assess blame or need for personnel actions. Any Human Resources led investigation collects its own relevant information and statements for its specific purpose of evaluating a potential District policy violation.

REPORTING AND COMMUNICATION

A monthly status report on all serious incidents will be routed from the Safety Officer to supervisors for discussion at safety tailgate meetings. Supervisors' review of minor injury/incidents should also be discussed at safety tailgate or staff meetings. The status reports will be recorded and reviewable on the District safety website and will be continuously maintained on the District server under the direction of the Safety Officer. Actions resulting from safety investigations will be tracked by the responsible manager and results will also be recorded and reviewable on the District's safety website as reported by the Safety Officer. In addition, all final safety review reports will be routed to the following Distribution as a standard protocol: Chair of the Safety Committee, AGM-Engineering, AGM-Planning/Watershed and Lands, Director of Finance and Human Resources, Director of O&M, Director of Construction, Director of Engineering, Human Resources-Risk Manager, Watershed and Lands Manager, Environmental Compliance Officer, Water Operations Manager, Maintenance Manager.

Department Heads/Division Managers are responsible for correcting any deficiencies found during the review process, and communicating the incident review results to District staff.

The Safety Officer is responsible for verifying that corrective action(s) is/are implemented. All serious incidents are tracked and communicated on an incident log maintained by the Safety Officer.

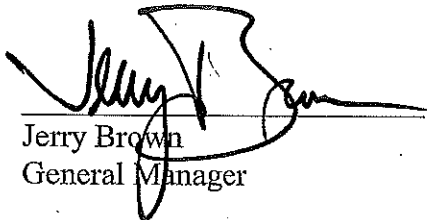
ACCIDENT REVIEW PANEL

The Accident Review Panel assesses the preventable or non-preventable nature of accidents or injuries and identifies any applicable safety problems which may exist. It also recommends revision to safety procedures, facility or equipment modification, and/or safety training, where appropriate, to minimize similar incidents in the future.

The Accident Review Panel is comprised of the Safety Officer and Manager most closely connected with the specific safety incident, and an appropriate representative from the District Safety Committee and/or Site Safety Committee. 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. 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. The Panel is convened on an as needed basis as determined by the Assistant General Manager – Engineering. The Accident Review Panel is recommended for review and 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.

The Accident Review Panel shall use a Root Cause Analysis procedure to conduct the accident/injury review. The review must not seek to establish fault or blame. See Attachment.

APPROVED:



Jerry Brown
General Manager

JB/SJW:kc

Attachment: Root Cause Analysis Form



CCWD Root Cause Analysis Procedure

Employee / Incident Information:
Employee Name: _____
Date of Hire: _____ Job Title: _____
Total Years in Job classification: _____ Shift Start Time: _____ Shift End Time: _____
Exact location of incident (Bldg/Level/Area): _____
Type of activity at time of incident (i.e., concrete cleanup): _____
Specific task at time of incident (i.e., finishing, sweeping): _____
How long had the worker been performing specific task: _____
Typical task for the week: _____
Typical task for the day: _____

Injury / Illness Information:
Date of Incident: _____ Day of Week: _____ Time of Incident: _____
Type of Injury: _____ Part of body injured: _____
Employee's Direct Supervisor: _____
Working on a crew? Yes No
Name of Witnesses
(list): _____
PPE worn at time of incident
(list): _____
Include Pertinent Photos of Incident Scene