ACCIDENT INVESTIGATION AND REPORTING SAFETY PROGRAM

REGULATORY STANDARD: OSHA - 29 CFR 1904

BASIS: OSHA requires all employers to maintain a written safety program. Accident investigation is primarily a fact-finding procedure - the facts revealed are used to prevent recurrences of similar accidents in the future. The focus of accident investigation at the company is to prevent future accidents and injuries in order to increase the safety and health of all our employees. This safety program establishes uniform requirements to ensure that accidents are evaluated; controls and procedures are implemented to reduce or prevent future occurrences, and that the proper hazard information is transmitted to all affected workers.

GENERAL: The company will ensure that jobs having a potential for employee injury within our facility are evaluated and controlled. The required types of protectors, engineering controls, and procedures suitable for the work to be performed will be made available to employees. No unprotected person shall knowingly be subjected to a hazardous work or environmental condition.

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1. **Purpose.** Accidents and Incidents result from a failure of people, equipment, supplies, or surroundings. A successful accident investigation determines not only what happened, but also attempts to find out how and why the accident occurred. Investigations are an effort to prevent a similar or perhaps more disastrous sequence of events. The company will review and evaluate this safety program:

1.1 On an annual basis

1.2 When changes occur that prompt revision of this document (within the company or to regulatory documents)

1.3 When facility operational changes occur that require a revision of this document

2. **Scope.** This program applies to the total workplace regardless of the number of workers employed or the number of work shifts.

3. **Responsibilities:**

3.1 Management:

3.1.1 Ensure supervisors are trained in accident investigation, as needed or required.

3.1.2 Encourage employees to report accidents and incidents.

3.1.3 Provide resources, as needed or required, to implement corrective actions based on results of incident investigations.

3.1.4 Review incident reports and any incident trends to establish corrective and preventive actions.

3.1.5 Communicate incident information to other areas of the company where similar incidents may occur, and implement preventive actions to eliminate the potential for future incidents.

3.1.6 Maintain required documentation.

3.1.7 Train appropriate personnel to review and implement Job Hazard Analysis and Trend Analysis as needed.

3.2 Supervisor:

3.2.1 Provide or arrange for adequate medical treatment for any injured employee.

3.2.2 Promptly investigate any incidents or near miss incidents that occur.

3.2.3 Provide recommendations to management on corrective actions to prevent recurrence of similar incidents.
3.3 Employees:

3.3.1 Promptly report incidents or near misses that occur.

3.3.2 Report hazardous conditions to your supervisor.

3.3.3 Participate in incident investigations, as needed or required.

3.4 Safety Officer (as needed or required):

3.4.1 Participate in incident investigations.

3.4.2 Review hazard reports and incident reports.

3.4.3 Recommend corrective or preventive actions to eliminate similar incidents.

3.4.4 Track corrective and preventive actions to ensure completion.

3.4.5 Prepare incident trend summaries and present to management.

3.4.6 Maintain required documentation.

4. Procedure:

4.1 Accident Investigation Team Composition. Supervisors, in conjunction with the safety officer as needed or required, are primarily responsible for the investigation of accidents and incidents. In addition, members of the safety committee or a separate Accident Investigation Team may serve as incident investigators.

4.2 Hazard Reporting:

4.2.1 The Hazard Report will be used by all employees to report potential or known hazards. The following procedures apply:

4.2.1.1 Person reporting hazard:

4.2.1.1.1 Notify department Supervisor of the hazard.

4.2.1.1.2 Accomplish lock-out/tag-out if required on the machine.

4.2.1.1.3 Fill out required sections of the hazard report.

4.2.1.1.4 Forward report immediately to the Safety Officer.

4.2.1.2 Supervisor:

4.2.1.2.5 Notify all affected workers of hazard.
4.2.1.2.6 Notify Maintenance Department of hazard, if required.

4.2.1.2.7 Ensure hazard is properly marked and controlled until corrected.

4.3 Accident Investigation, Analysis and Reporting. Accident investigation is primarily a fact-finding procedure; the facts revealed are used to prevent recurrences of similar accidents. The focus of accident investigation will be to prevent future accidents and injuries to increase the safety and health of all our employees.

4.3.1 Immediate concerns:

4.3.1.1 Ensure any injured person receives proper care.

4.3.1.2 Ensure co-workers and personnel working with similar equipment or in similar jobs are aware of the situation. This is to ensure that procedural problems or defects in certain models of equipment do not exist.

4.3.1.3 Start the investigation promptly.

4.3.2 Accident Investigation and Reporting. OSHA Form 301 (or a standardized investigation report form which details specific company requirements for investigation) will be developed and used to gather data to determine causes and corrective actions. As a minimum the form will contain the following areas of concern.

4.3.2.1 Injured employee's name and any other identifier

4.3.2.2 Employee's address

4.3.2.3 Date and time of injury

4.3.2.4 Shift and department

4.3.2.5 Sex/DOB

4.3.2.6 Length of service (hire date) and length of time at specific job

4.3.2.7 Time shift started

4.3.2.8 Physician's and hospital name (if transported)

4.3.2.9 Indication if employee was hospitalized as an in-patient (i.e. overnight)

4.3.2.10 Type of injury

4.3.2.11 Body part or body system injured
4.3.2.12 Resulting fatalities (date of death)

4.3.2.13 Occupation or task being performed just prior to being injured

4.3.2.14 Description and analysis of accident

4.3.2.15 Indication of the object or substance that directly harmed the employee

4.3.2.16 Name of person completing form, their title, phone number and the date

4.3.3 Additional information that is recommended on the form is:

4.3.3.1 Time shift started

4.3.3.2 Overtime length when injury occurred

4.3.3.3 Action taken to prevent recurrence

4.3.3.4 Employee’s statement

4.3.3.5 Witnesses’ statement

4.3.3.6 Employer’s statement

4.3.3.7 Name of person(s) reviewing form and date of review

4.4 Accident Investigation Review Team. A member of management responsible will review all Incident Reports for the department/section involved ensuring pertinent information is transmitted to all concerned and remedial action(s) taken.

4.5 Accident Investigation Final Report. The report will include but is not limited to the following:

4.5.1 Investigation report form and pertinent data

4.5.2 Photographs/drawings/exhibits of scene

4.5.3 Narrative of accident

4.5.4 Sequence of events

4.5.5 Contributing information

4.5.6 Findings and recommendations of review team

4.5.7 Action items and completion dates

4.5.8 Responsible persons
4.5.9 Follow-up procedures to ensure completion

4.5.10 Distribution list

4.6 Safety and Job Hazard Analysis. The company will identify through the use of information sources, screening and job surveys any activities that place employees at risk. After any accident or near miss, the task or job in question will have a job hazard analyses routinely performed by a qualified person(s). This analysis will help to verify that all required actions are being taken to determine if risk factors for a work position have been reduced or eliminated to the maximum extent feasible.

4.6.1 Workstation Analysis. Workstation analysis will be conducted to identify risk factors present in each job or workstation.

5. Safety Information:

5.1 Administrative Controls. Once data has been gathered from the Incident Report, administrative controls will be used where needed to eliminate or reduce the frequency and severity of accidents and near misses. Examples of administrative controls include the following:

5.1.1 Reducing the production rates and or line speeds where possible.

5.1.2 Providing rest pauses to relieve fatigued muscle-tendon groups.

5.1.3 Increasing the number of employees assigned to a task to alleviate severe conditions, especially in lifting heavy objects.

5.1.4 Using job rotation and as a preventive measure, not as a response to physical symptoms. The principle of job rotation is to alleviate physical fatigue and stress of a particular set of muscles and tendons by rotating employees among other jobs that use different muscle-tendon groups. If rotation is utilized, the job analyses must be reviewed to ensure that the same muscle-tendon groups are not used when they are rotated.

5.1.5 Providing sufficient numbers of standby/relief personnel to compensate for foreseeable upset conditions on the line (e.g., loss of workers).

5.1.6 Job enlargement. Having employees perform broader functions which reduce the stress on specific muscle groups while performing individual tasks.

5.1.7 Machine maintenance/guarding. Ensure regular maintenance is performed on machines and/or tools used by employees are properly guarded and that maintenance is routinely performed.

5.1.8 Employee training. Ensure all employees are properly trained in the hazards associated with the job before work is performed unsupervised.
5.2 Medical Management. The Safety Officer or other designated person will manage the safety program. Employees of each work shift should have access to health care providers or designated alternates in order to facilitate treatment, surveillance activities, and recording of information. During an accident investigation the medical management safety program will, as a minimum, address the following issues:

5.2.1 Injury and illness recordkeeping

5.2.2 Early recognition of problems such as strains and muscle fatigue that could lead to accidents

5.2.3 Systematic evaluation and referral

5.2.4 Conservative treatment after an accident

5.2.5 Conservative return to work after an accident

5.2.6 Systematic monitoring

5.2.7 Recordability criteria. The accident must be work related. Simply stated, unless the illness was caused solely by a non-work-related event or exposure off-premises, the case is presumed to be work related.

5.2.8 Occupational injuries. Injuries are caused by instantaneous events in the work environment. To keep recordkeeping determinations as simple and equitable as possible, back cases are classified as injuries even though some back conditions may be triggered by an instantaneous event and others develop as a result of repeated trauma. Any occupational injury involving any of the following circumstances is to be recorded on the OSHA-Form 300:

5.2.8.1 Medical treatment resulting from significant injury/illness as diagnosed by a physician or other licensed health care professional

5.2.8.2 Loss of consciousness

5.2.8.3 Restriction of work or motion

5.2.8.4 Contaminated needle stick or sharp exposure

5.2.8.5 Work related tuberculosis infection

5.2.8.6 Cases of medical removal as required under specific OSHA Regulatory Standard

5.2.8.7 Transfer to another job

5.2.9 When an incident is recorded on the OSHA Form 300, that same incident must also be recorded on OSHA Form 301.
5.2.10 Periodic Workplace Walk-throughs. Supervisors, in conjunction with the Safety Officer or Health Care provider as needed or required, will conduct periodic, systematic workplace walk-throughs on a monthly basis (OSHA recommended) to remain knowledgeable about operations and work practices, to identify potential light duty jobs, and to maintain close contact with employees. Safety Officers and Health care providers also should be involved in identifying accident risk factors in the workplace as part of the Accident Investigation Team. A record will be kept documenting the date of the walk-through, area(s) visited, accident risk factors recognized, and action initiated to correct identified problems. Follow-up will be initiated and documented to ensure corrective action is taken when indicated.

5.3 Accident Trend Analysis:

5.3.1 The information gathered from incident investigations, OSHA logs and hazard reports will help to identify areas or jobs where potential accident or injury conditions could or do exist. This information may be shared with anyone in the company since employees’ personal identifiers are not solicited. The analysis of medical records (e.g., sign-in logs and individual employee medical records) may reveal areas or jobs of concern, but it may also identify individual workers who require further follow-up. The information gathered while analyzing medical records will be of a confidential nature, therefore care must be exercised to protect the individual employee's privacy.

5.3.2 The information gained from the trend analysis may help determine the effectiveness of the various safety programs initiated to decrease accidents in our facility.

5.3.3 Employee survey or Job Hazard Analysis. A survey may be used to provide a standardized measure of the extent of progress in reducing work-related accidents for each area of the plant or facility. This will determine which jobs are exhibiting problems and measure progress of the overall safety program.

5.3.3.1 Design of the survey. A survey of employees will be conducted to measure employee awareness of work-related accident and to report the location, frequency, and type of accidents likely to occur.

5.3.3.2 Surveys normally will not include an employee’s personal identifiers. This is to encourage employee participation in the survey.

5.3.3.3 Frequency. Surveys will be conducted as a minimum on an annual basis or anytime deemed necessary by the Accident Investigation Team. Conducting the survey annually should help detect any major change in the prevalence, incidence, and/or location of reported and unreported accidents.

5.3.4 List of Jobs. The company will compile a list of jobs, tasks and activities. This listing should be prioritized, based on the risk factors for type of injury (s) sustained. Jobs will be analyzed to determine the physical procedures used in the performance of each job including lifting requirements, postures, handgrips, frequency of repetitive motion, and general safety requirements of the job. This information will assist health care providers in recommending assignments to light or restricted duty jobs. Supervisors should periodically review and update the lists.
6. Training and Information:

6.1 The purpose of accident investigation training and education is to ensure those members of the Accident Investigation Team and all of our employees are sufficiently informed about the Accident Investigation Safety Program.

6.1.1 Employees will be adequately trained about the company’s Accident Investigation Safety Program. Proper training will allow managers, supervisors, and employees to understand the procedures to follow to report an accident, hazards associated with a job or production process, their prevention and control, and their medical consequences.

6.1.2 Training program design. The program will be designed and implemented by the Safety Officer, Senior Manager or other designated person. Appropriate special training will be provided for personnel responsible for administering the program.

6.1.3 Learning level. The safety program will be presented in language and at a level of understanding appropriate for the individuals being trained. It will provide an overview of the potential risk of illnesses and injuries, their causes and early symptoms, the means of prevention, and treatment.

6.1.4 Training for affected employees will consist of both general and specific job training:

6.1.4.1 General Training. Employees will be given formal instruction on the hazards associated with their jobs and with their equipment. This will include information on the varieties of hazards associated with the job, what risk factors cause or contribute to them, how to recognize and report hazardous conditions, and how to prevent accident with their respective jobs. This instruction will be repeated for each employee as necessary. This training will be conducted on an annual basis. (OSHA experience indicates that, at a minimum, annual retraining is advisable).

6.1.4.2 Job-Specific Training. New employees and reassigned workers will receive an initial orientation and hands-on training before being placed in a full-production job. Each new hire will receive a demonstration of the proper use of and procedures for all tools and equipment before assignment.

6.1.5 Training for Supervisors. Supervisors are responsible for ensuring that employees follow safe work practices and receive appropriate training to enable them to do this. Supervisors therefore will undergo training comparable to that of the employees. Such additional training as will enable them to recognize and correct hazardous work practices, proper accident reporting/investigation requirements, and to reinforce the company safety program.

6.1.6 Training for Managers. Managers will be made aware of their safety and health responsibilities and will receive sufficient training pertaining to issues at each workstation and in the production process as a whole so that they can effectively carry out their responsibilities.
6.1.7 Training for Engineers and Maintenance Personnel. Plant engineers and maintenance personnel will be trained in the prevention and correction of job hazards through job and workstation design and proper maintenance, both in general and as applied to the specific conditions of the facility.

6.2 Employee Training and Education. Health care providers will participate in the training and education of all employees, as needed or required. This training will be reinforced during workplace walk-throughs and the individual health surveillance appointments. All new employees will be given such education during orientation. This demonstration of concern along with the distribution of information should facilitate early recognition of accident conditions before their development, an elimination or reduction in accidents, and increased likelihood of compliance with recognition, prevention, and control.

7. Definitions.

- **Accident** - An injury or substance exposure that results in a detrimental health effect to an individual.
- **Incident** – An event that results in an accident, near miss or property damage.
- **Near Miss** – An avoided accident. An incident that could have occurred, but due to mitigating circumstances (or luck) did not occur.

8. Summary. Accidents and Incidents result from a failure of people, equipment, supplies, or surroundings. A successful accident investigation determines not only what happened, but also attempts to find out how and why the accident occurred. Investigations are an effort to prevent a similar or perhaps more disastrous sequence of events.

8.1 Basic Responsibilities:

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8.2 Training:

8.2.1 Supervisors and members of the accident investigation team will be adequately trained in accident investigation techniques and in the methods to recognize hazards.

8.2.2 Employees will be trained and informed on the hazards of their job duties and provided with resources to assist them in preventing injury or work related illnesses.
8.2.3 All employees will receive a general safety orientation upon initial assignment to the company or to a new area or job.

A detailed analysis of an accident will normally reveal three cause levels: basic, indirect, and direct.