



ACCIDENT & INCIDENT REPORTING & INVESTIGATION PLAN

PURPOSE

The purpose of this plan is to aid in providing a safe working environment for all city employees by establishing post incident procedures and finding out what happened in an incident and implement ways to prevent a recurrence and to establish training or refresher training needs.

Nearly every accident/incident offers the possibility of preventing another incident sometime in the future. Accident/incident investigations that are conducted properly:

1. Provide crucial information about all causes and factors that contributed to the incident
2. Help improve supervisors' accountability for the actions of their employees
3. Result in improved recommended corrective actions to prevent the reoccurrence of similar incidents
4. Help ensure that corrective actions are implemented timely

POLICY STATEMENT

The City of Geneseo recognizes the need to provide a safe workplace for our employees and safe operations and services for our citizens. We also recognize that accidents can be prevented and that incidents (including close calls), if properly investigated for all causes can prevent future incidents from occurring. To this end, we have created city-wide Accident/Incident Investigation Plan that will be implemented in each department.

LEADERSHIP COMMITMENT

Municipal leaders commit to:

- Visiting job sites when possible to observe safety issues when possible and to ask for demonstrations of safety activities.
- Holding site supervisors accountable for loss prevention and safety.
- Holds department heads, supervisors and employees accountable for timely reporting of accidents/incidents (including close calls) and for proper and thorough investigation of accidents/incidents (including close calls).
- Ensuring adequate resources and equipment are available and used.
- Requiring documentation of site inspections by the competent person.
- Recognizing employees for using safe work practices.

PLAN ADMINISTRATION

The Human Resources Department has been appointed to function as the Administrator of this Plan. The Administrator will ensure that this Plan is developed, implemented, and evaluated at least annually as to changes in municipal operations, and to ensure that all employees are trained initially and periodically thereafter in proper accident/incident reporting and investigations.

AVAILABILITY

Copies of this written plan are kept in HR Office in City Hall and are available upon request to employees, their designated representatives, and any state or federal regulatory agencies.

EMPLOYEE INPUT

If after reading this program, any affected employee finds that improvements can be made, please contact Human Resources. We encourage all suggestions because we are committed to the success of our written Accident/Incident Reporting and Investigation program. We strive for clear understanding, safe behavior, and involvement from every level of our municipal workforce.

PLAN REVIEW AND UPDATE

This Plan will be reviewed annually by the plan administrator or designee(s) to ensure the program's effectiveness and will be updated as determined by the review. This Plan will also be updated whenever workplace processes indicate that the current plan is outdated or not effective.

PROGRAM EVALUATION AND REASSESSMENT

Elements which will be considered in the reassessment include:

- Adequacy of program.
- Accidents and illness experience.
- The adequacy of program records.
- Recommendation for program improvement and modification.
- Coordination with overall safety and health program.

ROLES AND RESPONSIBILITIES

Plan administrator. The plan administrator:

- Ensures that the Plan is created, distributed and implemented.
- Reviews the Plan periodically (at least once a year).
- Maintains a copy of the Plan in his/her office.
- Monitors the overall effectiveness of the program through audits and annual reviews.
- Provides or assists with arranging employee training and refresher training when needed.
- Investigates and documents all reported accidents and/or close calls that are directly or indirectly related to municipal activities and operations.

The plan administrator may designate a competent person with the authority to administer or implement one or more components of this Plan.

Department Head. Department Head:

- Reviews operations with supervisors to determine which supervisors require Accident/Incident Investigation training.
- Holds employees accountable for timely reporting of accidents/incidents (including close calls).
- Holds supervisors accountable for properly and thoroughly investigating accidents/incidents (including close calls).
- Ensures that supervisors receive training in Accident/Incident Investigation, including how to determine all causes.
- Makes contact with Human Resources – If any one of the below situations occurs, HR will advise the Department Head regarding Illinois OSHA Reporting:
 - All work-related fatalities within 8 hours
 - All work-related inpatient hospitalizations, all amputations and all losses of an eye within 24 hours.

Supervisor. Supervisor:

- Implements this Plan for the work areas under his/her control.
- Ensures that employees under his/her control understand the importance of reporting all incidents and accidents immediately (including close calls) and makes employees feel comfortable about reporting.
- Holds employees accountable for timely reporting of accidents/incidents, including close calls.
- Properly and thoroughly investigates all accidents/incidents (including close calls and public liability incidents) in his/her work area, except minor injuries and illnesses.
- Provides effective recommendations for corrective actions needed to prevent recurrences.
- Ensures that documents are completed timely and send to the correct persons.
- Successfully completes training for Accident/Incident Investigations.

Employee. Employees:

- Adhere to the requirements of this Plan.
- Report all first-aid, close calls and injuries and illnesses immediately to designated person.
- Cooperate in properly and thoroughly completing Employee Accident Report.
- Cooperate in any accident/incident investigation.

DEFINITIONS

Accident. An undesired event or sequence of events causing injury, ill-health or property damage.

Accident/incident investigation. The determination of the facts of an accident/incident by inquiry, observation, and examination and an analysis of these facts to establish the causes of the accident/incident and the measures that must be adopted to prevent its recurrence.

All causes. The causes that, if corrected, would prevent recurrence of the accident/incident and similar occurrences (e.g. ineffective training program).

Cause analysis. A systematic technique that focuses on finding all the causes of a problem and dealing with those, rather than just dealing with its symptoms.

Close call. Incident where, given a slight shift in time or distance, injury, ill-health or damage easily could have occurred to employees, members of the public, or to property, but didn't this time. We view

any close call as a wake-up call and therefore will investigate them as diligently as actual accidents or incidents.

Incident. An unplanned, undesired event that hinders completion of a task and may cause injury or other damage.

Indirect cause. The cause that contributed to the accident/incident itself, but by itself wouldn't have caused the accident/incident (e.g. lack of training of employees in fire safety).

“ALL CAUSE” ANALYSIS & BENEFITS OF ASKING “WHY?”

Identifying the most obvious cause of an accident/incident may not prevent recurrence unless we also identify and address other more deeper and not-so-obvious causes. Following is a simple example of how asking “Why?” more than once can help us dig deeper to uncover the essence of a problem:

Problem: My car won't start

1. Why? The battery is dead. (One could stop here and assume that by getting a new battery, one has prevented similar incidents from happening, but see how digging deeper uncovers other causes).
2. Why? The alternator isn't functioning.
3. Why? The alternator belt is broken.
4. Why? The alternator belt was well beyond its useful service life and hasn't been replaced.
5. Why? I haven't been maintaining my car according to the recommended service schedule.

Obviously the above example could have gone into further iterations of asking why. But it shows that asking “Why?” only once and getting a new battery likely won't prevent the same or similar incidents from happening in the future. Unless one addresses the issue of failing to properly maintain the vehicle according to the recommended service schedule, then it's likely that there will be future incidents where the vehicle malfunctions – some of which could be serious, costly, and time-consuming – just like accidents in the workplace.

EQUIPMENT

The following equipment may come in handy for Supervisors who are going to a worksite to investigate an accident/incident or close call:

- Pens and notebook
- Measuring tape
- Scissors
- Specimen containers
- Camera
- Tape recorder (or cell phone recorder)
- Gloves
- Copies of accident report forms, checklists
- Telephone numbers
- Personal protective equipment
- Items specific to your worksites

PROCEDURES

EMPLOYEE ACCIDENT/INCIDENT REPORTING

1. Employees must report all work-related incidents and accidents. This includes all situations where a City employee experiences an injury or illness while at work, no matter how minor, as well as any incident where a City employee is involved in an incident where property damage occurs.
 - a. For serious injuries and accidents, such as those involving hospitalization or death of an employee, medical treatment of the injured employee should be arranged for immediately and the area should be secured to prevent further injuries and so evidence, etc. isn't disturbed.
 - b. Post-accident urine drug and breath alcohol testing will be required of those employees who are involved in an accident if the driver receives a citation for a moving traffic violation arising from the accident, property damage results from the accident in an amount estimated to be over \$1,000, or there is a fatality, regardless of whether the employee requires medical attention.
 - c. Any employee suspected of drug or alcohol use as a result of reasonable evidence may be subjected to a reasonable cause urine drug or breath alcohol test. Refusal to submit to such screening will be considered a positive test. A reasonable cause observation form must be completed and signed by at least one qualified supervisor within 24 hours of the observation that led to a reasonable cause test.

2. The Supervisor must immediately notify the Department Head when any of the situations referenced in parts "a", "b", or "c" above occur. The Department Head will immediately notify Human Resources and the City Administrator.
 - i. Post-Accident and/or reasonable cause drug and alcohol screening will be initiated by the Department Head, Human Resources or City Administrator, and the procedures in the City's Drug & Alcohol Policy will be followed.

3. In the event of a work-related fatality, OSHA must be contacted within 8 hours. All work related inpatient hospitalizations, all amputations and all losses of an eye must be reported within 24 hours. The Department Head should immediately make contact with Human Resources and the City Administrator when one of these events occurs. Human Resources and/or the City Administrator will give direction on further steps/reporting procedures for the event.
 - a. The department head should have the following information collected and prepared when notifying Human Resources/City Administration:
 - Time of the incident
 - Number of fatalities or hospitalized employees
 - Names of any injured employees
 - A brief description of the incident

4. Employees and witnesses must complete the Employee Accident Report (See Appendix) form as soon as reasonably possible after the incident and give the form to Human Resources. These completed forms assist in the processing of any Workers' Compensation claim we may have with our coverage carrier.

5. The Supervisor will ensure that the employee(s) has received adequate medical attention if needed and that the site is safe to enter. S/he will also look for any witnesses and record the scene with photos or sketches, safeguard any evidence, and establish what happened.

CLOSE CALL INCIDENT

A close call is a wake-up-call and should be treated seriously. The investigation procedures for close call incidents will follow an abbreviated outline derived from the Accident Investigation procedures. Supervisors will use the Close Call Incident and Investigation Report (See Appendix) form or equivalent for gathering information about close calls. The Supervisor will use the information from his/her investigation to redesign work environments, stop processes and behaviors that could just have easily resulted in an injury.

MUNICIPAL ACCIDENT/INCIDENT REPORTING

All Departments are required to follow the procedures under the “employee accident /incident reporting” section of this document. If a situation does not follow under a serious/immediate report incident category (sections a,b, & c), reports must be submitted to HR within 24 hours. Delays in claim reporting can mean that physical evidence is lost or locations are altered, witness testimony may be lost. Lastly, we could even jeopardize our own coverage by delaying reporting.

When in doubt, even if we believe we can collect from another party, always err on the side of caution and report the claim to the designated person so s/he can report it to our coverage carrier.

ACCIDENT/INCIDENT INVESTIGATION

Thorough investigation of all accidents and incidents, including close calls will help us identify the causes of accidents and help:

- Reduce economic losses from injuries and lost time;
- Determine why accidents occur, where they happen, and any trends that might be developing;
- Employees develop an awareness of workplace problems and hazards;
- Identify areas for improving processes and procedures to increase safety and productivity;
- Note areas where training or education needs to be improved; and
- Suggest a focus for our risk management and loss control development.

1. At a minimum, Supervisors, Department Heads and Human Resources will promptly and thoroughly take appropriate steps to investigate:
 - a. All accidents/incidents involving lost time (for Workers' Compensation).
 - b. All incidents involving damage to municipal property in excess of \$500.
 - c. All incidents for liability for bodily injury/property damage to others.
 - d. All close calls that could have resulted in any of the above.

Investigations must begin the moment it's known that an incident (including a close call) has happened since, as time passes, people tend to forget facts and a delay of only a few hours can result in evidence being removed, destroyed or forgotten.

2. The investigator(s) will:
 - a. Remember that the goal is not to place blame for the incident but rather to uncover **all** causes so that future accidents and incidents can be prevented.
 - b. Document all observable facts about the scene and workplace environment including:
 - i. Hazardous conditions such as slippery floors, poor lighting, poor housekeeping, defective tools, equipment failure, etc.).
 - ii. Hazardous practices such as improper attention, horseplay, ignored safety rules, failure to follow procedures, removing machine guards, failure to wear PPE, failure to report hazards, or inadequate knowledge or training for the task being done.).
 - iii. All causes of any of the above (e.g. poor work procedures, no follow-up or feedback, lack of training, poor safety management, buying unsafe equipment, lack of supervision, rules not enforced, lack of safety leadership commitment, etc.
 - c. Identify witnesses, including injured employee, supervisors, co-workers, contractors on the job, onlookers, etc.
 - d. Interview all the people involved, interviewing in private, keeping conversations informal, asking open ended questions, etc. Investigator(s) will:
 - i. Ask employees and witnesses, in separate interviews, to tell in their own words exactly what happened.
 - ii. Repeat the employees' or witnesses' versions of the events back to them and allow them to make any corrections or additions.
 - iii. After the employee/witness has given his/her description of the event, ask appropriate questions that focus on causes. Ask questions like Who, What, When, Where, Why, and How.
 - e. Take notes on employees and witnesses statements and physical evidence such as position of tools and equipment, equipment operation logs, charts and records, environmental conditions, take samples if needed, note housekeeping and general working environment, etc.
 - f. Distinguish fact from opinion.
 - g. Look for **all** contributing factors and not just stop at the obvious first cause. For example, while the employee's failure to follow established procedures may seem to be the cause of the incident, deeper analysis may reveal that there is a culture of "cutting corners" to get jobs done quickly and if so, then corrective actions will also need to include management/culture changes.
 - h. Investigate the procedures, supervisor's directives, training, equipment, weather, etc.
3. The Supervisor will completely and thoroughly complete the Supervisor's Accident Investigation (See Appendix) form and give the form to Human Resources.
4. The investigator(s) will write a report that provides an accurate narrative of what happened, including a clear description of unsafe act or condition. The report will also provide effective recommendations for corrective actions needed to eliminate or control the hazards to prevent recurrences, including a timeline for completion of the recommended actions. Report conclusions should also include:
 - a. What should happen to prevent future accidents/incidents?
 - b. What resources are needed?
 - c. Who is responsible for making changes?
 - d. Who will follow up and ensure that changes are implemented.
5. Supervisors should take corrective action within their authority. If a corrective action isn't within their authority, they should make suggestions to the appropriate management. If no immediate corrective actions come to mind, the Supervisor will brainstorm with other supervisors and/or employees.

COMMUNICATION

We will communicate this Plan and its requirements to all employees:

1. When initially created.
2. To newly hired employees at the time of hire.
3. When we change or update the plan.

Also we will communicate the findings of investigations to management and affected employees so they understand how to prevent future similar incidents.

TRAINING

The information and requirements of this Plan will be presented to employees, supervisors and Department Heads either as a single topic of training or generally in various trainings, safety meetings, staff meetings, etc. Communication will include:

1. Conducting on-site investigation of all incidents.
2. Interviewing witnesses and reconstructing events.
3. Documenting use of required PPE, tools, and conditions.
4. Determining contributing factors and identifying all causes.
5. Identifying immediate corrective actions to prevent further immediate injury.
6. Identifying personnel responsible for corrective actions.
7. Mechanism for follow-up to ensure that corrective actions were completed.
8. How/why to accurately and thoroughly complete and timely return the Employee Accident Report and Supervisor Accident Investigation forms.

REFRESHER TRAINING

Refresher communication will be performed whenever it's determined that employees or supervisors don't have the necessary knowledge or skills to adhere to the requirements of this Plan or when the Plan changes.

SAFETY MEETINGS

Supervisors are encouraged to hold periodic safety meetings (e.g. weekly) to provide quick tips and project/topical/seasonal safety reminders to employees, as well as to remind the employee of our ongoing commitment to safety. Each meeting should be short and best held at the beginning of the day, shift, project, etc., and have a specific topic of interest.

DOCUMENTATION AND RECORDKEEPING

Human Resources keeps documentation of all investigations conducted, including all causes of the incident, recommendations for corrective actions to prevent future losses or similar recurrences, and corrective actions completed (See Appendix).

CONFIDENTIALITY OF MEDICAL RECORDS

Medical information obtained about employees will be maintained in confidence in accordance with state and federal law. Questions about confidentiality of medical records should be addressed to Human Resources.

ENFORCEMENT AND DISCIPLINE

All employees, including all levels of management, will be held accountable for obeying the worksite safety and health rules, including the requirements outlined in this Plan. Because failure to comply with policies and procedures regarding health and safety can result in employee injuries as well as Illinois OSHA citations and fines, an employee who does not comply with this program will be disciplined in accordance with progressive disciplinary procedures as governed by union contract and/or City Personnel Policy