OHS Incident Investigation Procedure

1. Purpose and objectives

The purpose of this procedure is to outline the requirements for investigation of incidents at the University of Queensland.

The objective of this procedure is to:

- Ensure all events are classified and managed to prevent a recurrence and eliminate, or minimise risk to health and safety.
- Define the investigation process to encourage suggestions and opportunities for improvement to prevent adverse events (including incidents and non-conformance) and improve health and safety performance.
- Align the UQ procedures associated with incident management and incident reporting with incident investigation processes.

2. Definitions, terms, acronyms

- **Corrective Actions** – improvements to rectify a non-conformity or other undesirable situation.
- **ICAM Investigation** - Incident Cause Analysis Method for incident investigation.
- **Incident** - Any event that leads to, or might have led to, injury or illness to people, danger to health and/or damage to property or the environment. For the purpose of this procedure, the term "incident" is used as an inclusive term for all events including near miss, non-conformance and notifiable incident.
- **Incident Classification** - Incidents are classified into three levels based on the actual or potential consequence of the incident and the likelihood of a recurrence. Refer to section 7, Table 1: Incident Classification.
- **Incident Risk Level** - A rating of the risk level at the time of the incident.
- **Near miss** - Any event that might have led to injury or illness of a person or non-conformance.
- **Non-conformances** – Incidents or breeches that may be reportable under specific legislation e.g. breeches relating to genetically modified organisms, boating or diving incidents.
- **Notifiable incident** - Serious incidents (serious injury / illness or dangerous incident) which, in accordance with legislative obligations, are required to be reported to the work health and safety regulator (Workplace Health and Safety Queensland).
- **Preventative Actions** – improvements to address the potential of a non-conformity or other undesirable situation.
- **Worker** – includes staff, students, visitors, volunteers and contractors.

3. Procedures scope/coverage

This procedure applies to staff, students, visitors, volunteers and contractors involved in any situation where a work-related incident, near miss or non-conformance has occurred. The incident investigation procedure extends to any contractor working at a University of Queensland workplace. Contractors may utilise proprietary or other procedures for the process of investigation. Such procedures must meet the minimum provisions of this procedure.

This procedure covers the investigation of work-related incidents, including near miss, injury, illness, non-conformances and notifiable incidents. The processes outlined in this
procedure follows on from the PPL 7.60.01 Critical Incident Management Policy and PPL 2.10.07 Workplace Injury, Illness and Incident Reporting Procedure.

4. Procedures statement

The purpose of investigation is to identify and assess risks not previously identified prior to an incident and to determine corrective and preventative actions to eliminate or control those risks, to prevent reoccurrences.

The University is also required to have effective processes for investigating work-related incidents and for the implementation of corrective and preventative actions.

5. Roles and responsibilities

5.1 Head of Organisational Unit
- Ensure incidents are reported and investigated to the appropriate level.
- Allocate suitable resources and time for appropriate level of investigation.
- Ensure the action plan is completed and relevant corrective actions are assigned and implemented.
- Complete the manager verification step in the database (if relevant).
- Liaise with OHS Manager, WHSC and/or OHS Division to report serious events to relevant stakeholders.

5.2 Supervisor
- Ensure incidents are reported and review the circumstances of the incident.
- Determine the Incident Classification to ensure appropriate level of investigation.
- Assist or lead in the preparation and completion of the incident report and investigation.
- Ensure the completion of the action plan within the UQSafe-Incident online report and ensure that corrective measures are identified and implemented in consultation with the local WHSC.
- Complete the manager verification step in the database (if relevant).
- Liaise with OHS Manager, WHSC and/or OHS Division to report serious events to relevant stakeholders.

5.3 Worker
- Report incidents directly to your supervisor and/or via UQSafe–Incident as soon as possible after the incident.
- Assist in post-incident investigation and identify and help implement corrective actions.
- Where relevant, complete the action plan within the UQSafe-Incident online report and ensure that corrective measures are identified and implemented.

5.4 OHS Manager / WHSC
- Provide assistance and advice for the investigation, and review circumstances and Incident Classification.
- Assist or lead in the preparation and completion of the incident report and investigation.
- Where necessary, supplement the investigation report with further information in the notes section, by uploading documents or by adding further actions to the action plan in UQSafe–Incident.
- Assist with the identification and implementation of corrective actions or controls.
- Liaise with Supervisor, Head of Organisational Unit and/or OHS Division to report serious events to relevant stakeholders.

### 5.5 OHS Division

- Provide assistance and advice for the investigation, and review circumstances and Incident Classification.
- Assist or lead in the preparation and completion of the incident report and investigation.
- Upload the investigation report to the relevant incident reported in UQSafe–Incident.
- Liaise with Supervisor, Head of Organisational Unit and OHS Manager/WHSC.
- Liaise with the relevant regulatory body (and legal counsel if necessary) in the event of a notifiable incident.
- Where appropriate, issue an Incident Alert or Safety Notice for dissemination to the organisation.

### 6. Immediate actions post incident

In the event of an incident, certain actions may be required depending on the situation. These may include:

- Initiate emergency response as per the Emergency Response Plan.
- Securing the incident scene and make safe e.g. isolate electricity.
- Provide any required treatment to those involved in the incident, e.g. first aid.
- If a minor incident, collect evidence for investigation e.g. photos, statements, broken equipment etc.
- If unsure of the Incident Classification, secure the scene and preserve evidence.
- Consult with WHSC, OHS Manager to verify investigation requirements.

For Critical Incident Management refer to the PPL 7.60.01 Critical Incident Management Policy.

### 7. Incident classification

The classification of an incident is determined using the guidelines provided in Table 1 below. This decision is based on the actual or potential consequence of the incident and the likelihood of a recurrence, the Incident Risk Level. This is determined using the OHS Risk Matrix in the UQSafe–Incident at Step 2 of the Action Plan. The Incident Risk Level is the rating of the risk level at the time of the incident and determines escalation requirements for any given incident.

Table 1 provides a definition of Incident Classification and the corresponding Incident Risk Level. To determine the level of investigation required refer to Table 1 upon completion of Step 2 in the Action Plan when reporting an incident in UQSafe–Incident.

<table>
<thead>
<tr>
<th>Table 1: Incident Classification</th>
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<tr>
<td>Classification</td>
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- Liaise with Supervisor, Head of Organisational Unit and/or OHS Division to report serious events to relevant stakeholders.
### Minor

A non-conformance, near miss, minor incident or minor injury has a localised impact on workers and may entail minor property damage. The incident has been contained and is unlikely to escalate in severity. It can usually be handled by campus personnel at the organisational unit level using normal operating procedures.

E.g. small chemical spill, first aid or medical treatment injury, injury-free vehicle collision.

<table>
<thead>
<tr>
<th>Level</th>
<th>Description</th>
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<tbody>
<tr>
<td>Low - Medium</td>
<td>A non-conformance, near miss, minor incident or minor injury has a localised impact on workers and may entail minor property damage. The incident has been contained and is unlikely to escalate in severity. It can usually be handled by campus personnel at the organisational unit level using normal operating procedures. E.g. small chemical spill, first aid or medical treatment injury, injury-free vehicle collision.</td>
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### Moderate

An incident or event, which has a localised impact on University operations and may threaten life or property, or could potentially escalate to a major incident. This may include a fire which is not immediately put out locally or a chemical spill or a gas leak where the source cannot be readily identified. A moderate incident might include high potential near miss, non-conformance or the serious injury of an individual.

E.g. significant gas leak, impairment, disability, near fatality, loss of vessel.

<table>
<thead>
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<th>Level</th>
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<tr>
<td>High</td>
<td>An incident or event, which has a localised impact on University operations and may threaten life or property, or could potentially escalate to a major incident. This may include a fire which is not immediately put out locally or a chemical spill or a gas leak where the source cannot be readily identified. A moderate incident might include high potential near miss, non-conformance or the serious injury of an individual. E.g. significant gas leak, impairment, disability, near fatality, loss of vessel.</td>
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### Major

An incident or event that has a high impact or imminent severe adverse effect on University operations stemming from events such as explosion, large fire, shooting, material release, pandemic or natural disaster. It may entail or threaten to cause single / multiple fatalities or serious injuries and/or significant property damage. It is likely to involve an emergency response from relevant Queensland Emergency Services and would usually necessitate activating the CIM Team.

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<tbody>
<tr>
<td>Extreme</td>
<td>An incident or event that has a high impact or imminent severe adverse effect on University operations stemming from events such as explosion, large fire, shooting, material release, pandemic or natural disaster. It may entail or threaten to cause single / multiple fatalities or serious injuries and/or significant property damage. It is likely to involve an emergency response from relevant Queensland Emergency Services and would usually necessitate activating the CIM Team.</td>
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### 8. Communication and reporting

Timely communication of incidents through the relevant organisational structure is a responsibility for all involved. If you are unsure or the incident is complex, you should liaise with the local WHSC, OHS Manager or the OHS Division.

All incidents must be reported in accordance with PPL 2.10.07 Workplace Injury, Illness and Incident Reporting Procedure.

The Incident Classification should be recorded in the Actions field during the steps in the Action Plan when reporting an incident in UQSafe–Incident.

Where further investigation is required this should be noted in the Immediate Actions or further actions recommended field of UQSafe–Incident.
9. Level of investigation

The Head of Organisational Unit, Supervisor or their delegate determines the level of investigation required by reference to the Incident Classification. The Head of Organisational Unit or Supervisor should appoint an investigation team with the skills, authority and responsibility to adequately investigate the event.

The level of investigation and investigative techniques are consistent with the risk of harm identified by the incident in accordance with the minimum requirements of Table 2 below:

<table>
<thead>
<tr>
<th>Incident Classification</th>
<th>Investigative Technique Required</th>
<th>Investigation Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor</td>
<td>Basic Investigation utilising the UQSafe-Incident reporting online. Basic investigations are conducted where the immediate actions can prevent the event from recurring, and the most appropriate contributing factors and appropriate control measures are identified. Timeframe: 3-5 working days.</td>
<td>Worker/Supervisor/WHSC/OHS Manager or other appointed by Head of Organisational Unit.</td>
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<tr>
<td>Moderate</td>
<td>ICAM Investigation utilising ICAM methodology and uploaded into UQSafe-Incident reporting online. ICAM investigations are conducted where immediate actions prevent the event from recurring in the short-term and further detailed investigation is required to determine the most appropriate contributing factors and control measures. Timeframe: 5-10 working days.</td>
<td>Investigation team appointed by Head of Organisational Unit or OHS Division Director. One investigator should have a background related to the event or area. The investigation leader should be trained in ICAM or equivalent advanced investigation techniques. OHS Manager or WHSC to be team member.</td>
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<tr>
<td>Major</td>
<td>As above</td>
<td>As above, however the investigation team is appointed by Vice-Chancellor or USMG member and should consist of one investigator from outside the business unit where the investigation is being conducted. In some cases, an additional independent, external investigation may be conducted in parallel as</td>
</tr>
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10. ICAM investigation

ICAM (Incident Cause Analysis Method) Investigation enables identification of systematic OHS deficiencies, assist investigation teams to identify what really went wrong and ensures recommendations are focused on what needs to be done to prevent recurrence. It is directed towards building ‘error-tolerant’ defence against future incidents.

To use the ICAM methodology the investigation leader should be trained in ICAM or equivalent advanced investigation techniques. An ICAM Investigation toolkit is provided during ICAM training and should be utilised for conducting ICAM investigations. Additional toolkits are available from the OHS Division.

The objectives of an ICAM investigation are:

- Establish the facts.
- Identify contributing factors and latent hazards.
- Review the adequacy of existing controls and procedures.
- Report the findings.
- Recommend corrective actions which can reduce risk and prevent recurrence.
- Detect organisational factors than can be analysed to identify specific or recurring problems.
- Identify key learnings for distribution.

ICAM investigations are not used to apportion blame or liability.

The ICAM investigation process involves:

- Data collection using the PEEPO tool.
- Data analysis using the ICAM tool.
- Develop recommendations using the Hierarchy of control and Benefit assessment tool.
- Key learnings presented in an ICAM Investigation Report.

10.1 ICAM Investigation Report

The ICAM investigation report is the presentation of the investigation findings and recommendations. The format of the report is the responsibility of the Lead Investigator and the Investigation Team, however inclusion of the ICAM chart and the following aspects are a minimum requirement:

- Incident description.
- Key findings.
- Conclusion and observations.
- Recommendations.
- Significant learnings.
- ICAM analysis.
- Corrective action plan.
11. Regulatory investigation

When an incident is reportable to external authorities, consideration shall be given to seeking legal professional privilege over any investigation undertaken or commissioned by the University of Queensland. This decision is to be made by the Vice-Chancellor or delegate on advice from the UQ General Counsel. The OHS Director should ensure that advice from UQ General Counsel is received. Privilege is obtained by seeking advice on legal liability that may exist in regards to an incident. Legal instruction is then received and investigation is undertaken under this instruction.

11.1 Inspection by a regulator

When inspection is conducted on the premises of the University of Queensland by a regulatory authority that administers health and safety the following shall be conducted as a minimum:

- The person being the first point of contact with the regulatory authority, shall advise the OHS Division Director of the scope and criteria for the visit.
- An inspection coordinator shall be appointed by the OHS Division Director for the purposes of accompanying the regulator and to act as liaison.
- The inspection coordinator shall determine and facilitate the required actions before, during and following the inspection.
- The inspection coordinator shall record and where practicable, take samples and photographs similar to those taken by the regulatory authority.
- The inspection coordinator shall communicate required actions to the OHS Division Director.
- The OHS Division Director shall be responsible for establishing and maintaining a record of the inspection.
- The OHS Division Director shall ensure copies of all documents and reports provided to a regulatory authority are provided through legal counsel.

12. Witness interviews, photographs and evidence

Formal statements from witnesses may be required for moderate and major incidents. The Head of Organisational Unit is responsible for arranging resources to be provided to the investigation team. Statements once obtained, are confidential documents and remain the property of the interviewee. Although used to form conclusions and recommendations within an investigation report, statements shall not be freely circulated.

Heads of Organisational Units are responsible for ensuring that adequate facilities and resources are available at all times to secure the scene of an incident until initial investigations have been undertaken in accordance with this procedure (or in the case of notifiable work health and safety incidents, until the regulator has been notified and provided advice). Evidence gathered as part of the investigative process, is recorded and securely preserved to allow retrieval at a later date.
13. Action plans

Workers are encouraged to report and offer any opportunities for improvement to University processes. This is an important proactive measure to reduce the likelihood of incidents and/or system non-conformances from occurring.

Corrective and preventative actions must be entered into the Action Plan in UQ Safe – Incident. All actions must be allocated to a Person Responsible and given a Target Completion Date.

13.1 Recommending corrective actions

The following considerations should be taken into account when developing corrective actions:

- Does the corrective action address the contributing factors?
- Is the OHS Risk Treatment in accordance with the OHS Risk Management Procedure and the hierarchy of controls?
- Existing knowledge and impact on the business.
- The person responsible for the action agrees with the action being allocated to them and the Target completion date for implementation.

13.2 OHS risk management

Changes resulting from actions should result in a review and update of the relevant OHS risk assessment and the OHS risks in the appropriate organisational risk register as per PPL 2.30.01 Occupational Health and Safety Risk Management Procedure.

14. Review and approval of investigation

The Investigation is to be reviewed and approved at the relevant organisational level as automated in UQ Safe - Incident.

The Investigation is required to be reviewed to:

- Verify quality of the investigation
- Enable those in management levels to provide feedback, clarification and further information (where required) on the findings before wider dissemination.
- Enable those in management levels to consider impact of the report findings before wider dissemination.
- Enable Legal implications to be considered (for moderate and major incidents)

The approval of the investigation indicates that the approver accepts the Investigation report, including its findings.

15. Contact for Additional Information

UQ OHS Division
Phone: 3365 2365
Email: ohs@uq.edu.au