Incident Management

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1.0 Purpose

The purpose of this element is to ensure all hazards and incidents are reported, investigated, and recorded in accordance with legislative requirements.

The purpose of this element is to:

- Ensure timely reporting and investigation of incidents;
- Ensure corrective actions are identified, communicated and implemented to prevent reoccurrence and lessons learned are recognized and documented; and
- Comply with Occupational Health and Safety legislation.

2.0 Scope

All incidents involving faculty, staff, students, visitors and contractors occurring on university property or while conducting university business will be subject to an investigation.

3.0 Definitions

First Aid: The initial and immediate assistance given for illness or injury with minimal or no medical equipment.

Hazard Observation: Source, situation, or act with a potential for harm in terms of human injury or illness or a combination of these.

Incident: Work-related event in which an injury or illness (regardless of severity) or fatality occurred, or could have occurred:

Accident: is a particular type of incident in which an injury or illness actually occurs.

Injury: The result of a chance event occasioned by a physical or natural cause, the result of a willful and intentional act, disablement, occupational illness, or death as a result of an injury, arising out of and in the course of employment. It includes a recurrence of an injury and an aggravation of a pre-existing condition, but does not include stress other than stress that is an acute reaction to a sudden and unexpected traumatic event.

Lost-time injury (LTI): a work-related injury or disease which results in the individual being off work past the day of the accident, results in loss of wages/earnings or a permanent disability or impairment.

Medical Aid (MA): An injury that requires medical attention, but no day(s) is lost other than the day of injury. Medical, surgical and dental aid; hospital and skilled nursing services; and the use of prosthesis or apparatus and the repairing and replacement of them; and any attention given by a medical professional other than first aid.

Memorial’s Incident Management System (MIMS) - Pan-university web based incident reporting and risk management system provides a central repository to support the incident management program at the university. This system is used to manage all health and safety, security and student based incidents from the dispatch or reporting stage, through the investigation, corrective action...
implementation and lessons learned. The system has analytical capabilities used for statistical reporting and risk based decision making.

**Near Miss:** An incident where no injury, illness, or fatality occurs.

**Occupational Illness:** (herein referred to as “illness”): Any abnormal, debilitating condition of the body or mind, other than a physical injury arising out of any accident, suffered by an employee as a result of the work environment or physical activities performed in the course of employment.

**Report Only:** A minor injury not requiring first aid or medical aid.

**Root Cause:** The fundamental cause(s) that, if corrected, will prevent recurrence of an event or adverse condition.

**SCAT Technique:** A systematic consideration of possible causes leading to an accident, incident or nonconformity. Use it to evaluate a management system and determine opportunities for improvement.

**Serious Injury:** Under current legislation a "serious injury" is one that: a) places life in jeopardy; b) produces unconsciousness; c) results in substantial loss of blood; d) involves the fracture of a leg or arm but not a finger or toe; e) involves the amputation of a leg, arm, hand, foot, finger or toe; f) consists of burns to a major portion of the body; or g) causes the loss of sight in an eye.

## 4.0 Responsibilities

A comprehensive list of roles and responsibilities is provided in the Health and Safety Management System (HSMS) manual. The responsibilities with respect to Incident Management is summarized below.

### 4.1 Senior Executives, Deans and Directors

Including Unit Heads and Managers are responsible to:

- Ensure this element is communicated to all faculty, staff, students and contractors and compliance is maintained;
- Receive and review copies of incident reports that have occurred in areas for which they have responsibility;
- Support and provide resources for incident learning activities;
- Ensure incident causation is analyzed through incident investigation to identify hazards and appropriate corrective action(s) are implemented;
- Ensure lessons learned are communicated to all workers in areas for which they have responsibility;
- Participate and support all incident investigations as per Table 1.1.
- Ensure supervisors know and fulfill the duties and responsibilities for incident management as outlined in the both the OHS Act and this element;
- Ensure supervisors are competent in the skills to address incident response and incident investigations;
- Ensure records of hazard and incident reports, and the progress of recommended corrective/preventive action, are maintained;
• Ensure, as far as is reasonably practicable, adequate financial provision is made available to institute recommendations made on hazard and incident reports; and
• Participate and support all incident investigations as per Table 1.1.

4.2. Supervisors

Supervisors must:
• Ensure first aid or emergency services are provided to an injured worker;
• Ensure incident report is completed within MIMS;
• Participate and support all incident investigations as per Table 1.1;
• Ensure all corrective actions are implemented and monitored;
• Communicate lessons learned with all stakeholders; and
• Work with the HR department to facilitate an early and safe return to work program, for LTIs, as per the Return to Work Program, as required.

4.3. Workplace Health and Safety Committee

• Participate in the investigation of incidents as outlined in Table 1.1;
• Participate in education and training sessions on incident investigation; and
• Review incident investigations at WHSC meetings, identify areas of concern and make recommendations as necessary.

4.4. Members of the University community

• Report all workplace incidents to your supervisor, as applicable, regardless of severity;
• Workers who become aware of or are involved in an incident shall immediately initiate the appropriate emergency response, as required;
• Participate in incident investigations as outlined in Table 1.1. and provide the investigation team with information as required; and
• Follow any corrective action items that have been initiated as a result of the incident.

4.5. Environmental Health and Safety (EHS) Unit

• Ensure notification obligations to the Regulator and other parties are met, as required by NL OHS Act;
• Provide direction as needed for the implementation of the corrective measures;
• Review all incident investigation reports, ensure preventative and corrective measures are appropriate to control the identified hazards and investigation is satisfactory;
• Notify the WHSC and designated authority (DA) of all reported occupational injuries for their area; and
• Participate in incident investigations as outlined in Table 1.1.

5.0 Procedure

Incident management for Memorial is divided into several categories, including:
Incident Response;  
Incident Reporting;  
Incident Investigation;  
Corrective Action Implementation; and  
Monitoring; and  
Incident Learning.

5.1. Incident Response

When an incident occurs, all person(s) observing shall:

- React to the situation to the best of their ability based on the information they have;  
- Contact CEP immediately at 4100 or 911 if immediate medical attention or the assistance of emergency response personnel is required;  
- Make the area safe;  
- Provide first aid;  
- Contact immediate supervisor(s); and  
- Be prepared to render assistance as directed by responding parties.

If an incident results in a serious injury:

- Secure the scene and ensure witnesses of the incident do not leave the area and the area remains untouched unless it is to make the area safe or to seek help. The site where the incident occurred shall not be disturbed until the regulator inspects the site or gives direction to do so.

5.2. Incident Reporting Requirements

The severity of an incident dictates reporting requirements. Any incident that occurs on university property or while conducting business on behalf of the university must be reported regardless if it results in injury or illness to a person or damage to property.

Any incident that involves injury or illness to a person or damage to property, or had the potential to do so, must be reported immediately to an immediate supervisor and within 24 hours of the occurrence to Environmental Health and Safety (EHS).

5.2.1 Internal Notifications

The university community must report incidents or concerns through MIMS - e-Alert system and safety concerns and observations can also be submitted through the university’s MUN Safe app.  

Note: These systems are not monitored on a 24-7 basis, therefore emergent incidents should be reported to CEP at 864-4100 or to 911. Incident reports submitted through the MIMS system will be forwarded to the appropriate Human Resources (HR) unit (i.e. St. John’s Campus, Faculty of Medicine, Marine Institute etc.)

5.2.2 External Notifications

Service NL – OHS Division

Section 54 of the OHS Act requires when an accident takes place at a workplace resulting in serious injury to a person or results in the death of a person; or that had, or continues to have, reasonable
potential of causing serious injury to or the death of a person, the employer or principal contractor shall immediately notify the assistant deputy minister at (709) 729-4444 (24 Hours)

**WorkplaceNL**

If an incident involves medical aid or results in a lost time injury, an incident report must be completed in consultation with the immediate supervisor and submitted to EHS within 24 hours of the incident. Applicable WorkplaceNL forms must be completed and forwarded to Memorial’s HR department:

i. Injury Report - [Workers (Form 6)](http://www.whscc.nf.ca/employers/Emp_ReportingaWorkplaceIncidentorInjury.whscc), as soon as possible after incident

ii. Injury Report – [Employers (Form 7)](http://www.whscc.nf.ca/employers/Emp_ReportingaWorkplaceIncidentorInjury.whscc), within 3 days of incident

iii. Physician Report – 8/10 report, submitted directly to WorkplaceNL

Timelines outlined by WorkplaceNL must be strictly adhered to avoid penalty. Detailed WorkplaceNL procedures can be found by visiting: [http://www.whscc.nf.ca/employers/Emp_ReportingaWorkplaceIncidentorInjury.whscc](http://www.whscc.nf.ca/employers/Emp_ReportingaWorkplaceIncidentorInjury.whscc)

The table below outlines the university’s criteria for classification of incidents and determining potential consequences, notification requirements to internal and external stakeholders as well as investigation requirements as outlined in Table 1.1.
### STEP 1
Determine actual and/or reasonable potential consequences

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Class</th>
<th>Consequence</th>
<th>Notification and Timing</th>
<th>Investigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>• First-aid Treatment / Report Only</td>
<td>Class 1</td>
<td>Low Incident</td>
<td>Immediate</td>
<td>* Minimum: *Safety Supervisor and Worker</td>
</tr>
<tr>
<td>• Injury where there is first aid required or minor reversible health effects related to first-aid that do not require medical aid (eg. dizzy, headache, minor irritations, etc.)</td>
<td></td>
<td></td>
<td></td>
<td>SCAT Technique, as required</td>
</tr>
<tr>
<td>• Hazardous materials release- Near source onsite, confined and prompt recovery.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Single Stakeholder Complaint</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• &lt;$1K property damage</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• No Interruption to business operations / Business operations impacted with 1 day recovery</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| • Medical Aid | Class 2 | Minor Incident | Immediate | Immediate | Immediate | Immediate | Within 72 hrs | * Minimum: \*Safety Supervisor and Worker |
| • Reversible health effects related to Medical aid | | | | | | | | SCAT Technique, |
| • Hazardous materials release- Near source onsite, confined and short term recovery | | | | | | | | |
| • Multiple stakeholder complaints | | | | | | | | |
| • <$1K-10K property damage | | | | | | | | |
| • Business operations impacted with 2 day recovery | | | | | | | | |

| • Lost Time Injury (LTI) | Class 3 | Moderate Incident | Immediate | Immediate | Immediate | Immediate | Within 72 hrs | * Minimum: \*Safety Manager / Unit Head Supervisor, EHS designate and Worker |
| • Disabling Injury - Serious reversible health effects (eg. MSD, heat exhaustion, vibration effects, etc.) | | | | | | | | SCAT Technique, |
| • Exposures over the TLV – 8 hour Exposure limit (resulting in no long term affects) | | | | | | | | |
| • Sustained Complaints by multiple stakeholders | | | | | | | | |
| • <$10K-100K property damage | | | | | | | | |
| • Business operations impacted with 3 day recovery | | | | | | | | |
### Table 1.1 – Incident Classifications and Investigation Requirements

<table>
<thead>
<tr>
<th>Class</th>
<th>Consequence</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>High Incident</td>
</tr>
<tr>
<td>5</td>
<td>Very High Incident</td>
</tr>
</tbody>
</table>

- **Class 4 (High Incident)**
  - **Consequence Classification**: Immediate
  - **Notification and Timing**: Immediate, Immediate, Immediate, Immediate, Within 72 hrs
  - **Investigation Team**: Minimum: Safety
    - Manager / Unit Head, EHS designate and Worker
  - **Investigation Technique**: SCAT Technique,

- **Class 5 (Very High Incident)**
  - **Consequence Classification**: Immediate
  - **Notification and Timing**: Immediate, Immediate, Immediate, Immediate, Immediate
  - **Investigation Team**: Minimum: Dean/ Director,
    - Manager, / Unit Head, Supervisor, and EHS designate.
    - External Regulatory bodies will conduct separate investigations (Service NL, RNC etc...)
  - **Investigation Technique**: Externally facilitated

- **Criteria**:
  - Permanent Disability - Irreversible health effects and illness related to LTI (e.g., hearing or respiratory impairment, etc.)
  - Exposures over the TLV – 8 hour Exposure limit (Resulting in long term affects)
  - Complaints or issues that result in a Loss of Stakeholder Support and Trust
  - $100K-$1M property damage
  - Business operations impacted with 4 day recovery
  - Theft Under $5000
  - Acts intervention from the RNC.

- **Class 4 Criteria**:
  - Fatalities and/or Multiple Fatalities and/or a risk of fatality.
  - Exposures involving chemicals IDLH - Immediately Dangerous to Life & Health (e.g., asphyxiation, poisoning, etc.) severe life shortening illness (e.g., carcinogens)
  - Complaints that require Stakeholder Intervention
  - >$1M property damage
  - Business operations impacted with 5+ day recovery
  - Acts resulting in intervention from the RNC and Criminal Charges are pending.

*May be involved during any incident if it has the reasonable potential of causing serious injury to or the death of a person*
5.3. Incident Investigation

The focus of incident investigation is to determine what occurred in an effort to eliminate or minimize the likelihood of similar incidents occurring in the future. All incidents must have some level of investigation completed as soon as possible after the incident occurs. The type and degree of investigation will vary depending on the classification and severity of the incident, refer to Table 1.1. This table is a guideline and any incident deemed to have a high potential for injury, illness or property damage must be investigated as if the consequence occurred.

When the level of investigation required is unclear, it is the responsibility of the supervisor to consult with EHS to determine appropriate level of incident investigation.

5.7.1 Conducting Investigation

All formal and informal incident investigations will be led by and are the responsibility of the supervisor unless otherwise assigned by EHS.

The supervisor in consultation with the injured person will ensure the incident is reported and required investigation is completed. Investigation of incidents with a consequence / classification of 2 or lower can be completed using the MIMS system.

Incidents with a consequence / classification of 3 or higher will require a formal investigation. For incidents classified as high or very high, the supervisor will act as the immediate Investigation Team Leader while waiting for specified leader (or person acting in that capacity) to arrive.

In the initial investigation stages the Investigation Team Leader or their appointed onsite representative will arrange a preliminary meeting, as soon as the incident site is secure, with the investigation team to:

- Ensure the health and safety of all personnel including the investigation team by ensuring all the necessary immediate remedial actions have been implemented;
- Identify interim controls needed;
- Review all actions taken to date, first response, remedial, and investigative;
- Determine the investigation technique in accordance with Table 1.1;
- Ensure team member(s) clearly understand allocated tasks; and
- Coordinate an opening meeting between the investigation team and all personnel having direct involvement with the incident to explain the process.

The objective of the investigation is to identify the immediate/direct causes that lead to the incident, determine the root cause(s) of the incident and the required corrective actions, complete with timeline for implementation, to prevent similar incidents from occurring.

5.4. Corrective Action Implementation

The report will identify the investigation team and include a summary of events that lead to the incident and the response to the incident in an effort to identify the immediate/direct causes, determine the root cause(s) of the incident and the required corrective actions, complete with timeline for implementation, to prevent similar incidents from occurring. When necessary, the report will include appendices containing photographs, flow charts, and SCAT charts. Final approval of the report by investigation team must be documented prior to distribution to stakeholders.
The supervisor is responsible for adding the corrective actions into MIMS and delegating person(s) responsible for implementation of controls identified in the investigation report. In cases where the corrective actions are outside their level of authority, the supervisor is required to engage the DA for assistance.

5.5. **Monitoring**

Once corrective actions have been implemented they must be monitored to determine effectiveness. The key to monitoring is the ability to confirm through the provision of objective and factual evidence that demonstrates the root cause(s) of the incident have been controlled or eliminated. This evidence can take the form of data, records or first-hand observations. Any controls deemed inadequate must be reviewed and adjusted as required by the supervisor.

5.6. **Incident Learning**

Incidents that occur have a potential to occur in other areas throughout the university. Supervisors shall liaise with the Environmental Health and Safety team as appropriate, to initiate the communication of lessons learned and review selected incidents for potential unit or site-wide incident learning activities.

Consideration for learning opportunities should be given to, but not limited to, opportunities for improvement related to the:

- Reporting timelines (internal and external notifications) and procedures;
- Effectiveness of the response and notification phase of the incident;
- Composition of the incident investigation team;
- Clarity of investigation teams roles and responsibilities;
- Investigation process;
- Effectiveness of the investigation technique used;
- Adequacy of the corrective actions identified and implemented; and
- Communication provided to university stakeholders through the investigation process.

Methods to disseminate findings may include:

- Health and safety meetings and discussions;
- Health and safety bulletins;
- Toolbox talks;
- Articles in newsletters and Newsline notifications; and
- Multi-media.

5.7. **Training**

5.7.1 **Memorial’s Incident Management System Training**

All personnel with responsibilities to update MIMS shall be provided with training to a level appropriate to their role and responsibilities. Supervisors shall conduct initial investigations and submit their reports using the Incident Investigation module in MIMS.
5.7.2 Incident Investigation Training

Any person that may be required to participate in or complete an incident investigations must first complete Memorial’s incident investigation training.