

WHS Incident Investigation

Introduction

The purpose of this guide note is to provide Participating Agencies (hereafter Agency/s) with guidance for determining the level of incident investigations to meet the requirements of the Across Government Facilities Management Arrangement (AGFMA) WHS Framework.

All incidents involving subcontractors must be reported to the Agency Designated Representative who should follow Agency processes to report it internally. All incidents must be investigated by the Facilities Management Service Provide (FMSP) and contractor. In addition, the Agency may determine that an internal investigation be undertaken particularly where an incident is serious.

Incident investigations should focus on the identification of contributing factors and corrective actions, not the allocation of blame. The investigation should involve management representatives who have direct knowledge of the relevant work area and work processes.

Incident Investigations

The type and depth of investigation that may be required will be determined by several factors, including:

Minor injury/severity

Incidents of minor severity will not warrant a detailed investigation. Generally these incidents might include contusions/abrasions, minor sprains and strains, minor foreign bodies in eye/skin and the like. Minor severity incidents can be investigated and actioned with limited resources.

Minor injury/severity but repeated occurrence

Incidents that are minor in nature would not normally require an in depth detailed investigation however when several minor incidents occur due to the same contributing factor(s) and incur the same or similar outcome(s), this demonstrates a system failure and should be investigated in greater detail.

Significant near miss incident

With these incidents, no worker is injured however the consequence could have been much worse, for example a subcontractor may be working at heights and drop a heavy object which may just miss a person walking past, whereas if it hit the person the consequence could have been fatal. A significant near miss incident may also incur damage to asset(s). Note – depending on the circumstances a *Significant Near Miss* may also be classified as a *Dangerous Incident*.

Notifiable Incidents

Incidents involving serious injury or illness or a dangerous occurrence are defined by legislation and must be reported to the relevant Regulator.

Serious injury or illness of a person means an injury or illness requiring the person to have:

- a. immediate treatment as an in-patient in a hospital; or
- b. immediate treatment for—
 - a. the amputation of any part of his or her body; or

- b. a serious head injury; or
- c. a serious eye injury; or
- d. a serious burn; or
- e. the separation of his or her skin from an underlying tissue (such as de-gloving or scalping); or
- f. a spinal injury; or
- g. the loss of a bodily function; or
- h. serious lacerations; or
- c. medical treatment within 48 hours of exposure to a substance

Dangerous incident means an incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person's health or safety emanating from an immediate or imminent exposure to:

- a. an uncontrolled escape, spillage or leakage of a substance; or
- b. an uncontrolled implosion, explosion or fire; or
- c. an uncontrolled escape of gas or steam; or
- d. an uncontrolled escape of a pressurised substance; or
- e. electric shock (**note: these must also be reported to the Office of the Technical Regulator**); or
- f. the fall or release from a height of any plant, substance or thing; or
- g. the collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations; or
- h. the collapse or partial collapse of a structure; or
- i. the collapse or failure of an excavation or of any shoring supporting an excavation; or
- j. the inrush of water, mud or gas in workings, in an underground excavation or tunnel; or
- k. the interruption of the main system of ventilation in an underground excavation or tunnel; or
- l. any other event prescribed by the regulations,

ICAMs and RCAs

It is highly recommended that an **Incident Cause Analysis Method (ICAM)** or a **Root Cause Analysis (RCA)** level investigation is undertaken for any *incident with a consequence rating of significant, major or catastrophic* or *Notifiable Incident* that involves a contractor or subcontractor. Because Notifiable Incidents are serious incidents, they may lead to an external regulatory investigation, and potential prosecution. Consequently, only suitably trained and competent staff should undertake an ICAM or RCA.

ICAMs and RCAs enable identification of systemic WHS or environmental deficiencies, assist investigation teams to identify what went wrong and to ensure recommendations focus on what needs to be done to prevent recurrence. The process is directed towards building 'error-tolerant' defences against future incidents. An example of the ICAM steps is outlined below:

1. Immediate Action
2. Investigation Planning
3. Data Collection
4. Data Organisation
5. Data Analysis
6. Recommend and Report

As an example of the ICAM process, step 3 – data collection requires the investigation team to gather as many relevant facts as possible so as to understand the incident and the events leading up to it, and is usually described as a '[PEEPO Analysis](#)':

People – training, work roster, history up to time of incident, physiological/psychological factors, supervision;

Environment – time of day, weather, work-place conditions, housekeeping, lighting;

Equipment – design, functionality, inspection and testing, maintenance;

Procedures – correct, followed, Job Safety Analysis, Safe Work Method Statements, guides; and

Organisation – culture, training programs, organisational support, system safety and so on.

Corrective Actions

All incident investigations should identify recommendations for corrective actions to prevent recurrence. This is achieved by addressing the absent or failed defences and organisational factors identified.

If an ICAM or RCA is undertaken, the investigation team should work with line management in the development of corrective actions, as it is they who will implementing the action and monitoring its effectiveness.

For ICAMs or RCA's the FMSP and or Participating Agency is encouraged to provide a written report to the AGFMA Directorate to be presented to the Facilities Management Governance Group. This will enable the learnings to be shared across government.

Summary of Roles and Responsibilities

Role	Responsibilities
Participating Agency Chief Executives	<ul style="list-style-type: none">• Endorse, approve and support establishment of incident investigation strategies.• Recognise that as a concurrent duty holder, a Participating Agency has a responsibility for all workers.
Participating Agency Directors/Managers/Supervisors	<ul style="list-style-type: none">• Determine if a contractor/subcontractor incident needs to be investigated by the Participating Agency.• Where required facilitate cooperation with the FMSP and contracted workers with incident investigations.• Implement any relevant corrective action required.
Facilities Management Service Providers	<ul style="list-style-type: none">• Undertake incident investigations for all contractor/subcontractor incidents.• Implement any relevant corrective action required.• Inform DIT immediately of any incident• Provide DIT with investigation and corrective action reports upon request
Contracted Workers	<ul style="list-style-type: none">• Cooperate with the FMSP and Participating Agency representative/s throughout any relevant incident investigation.