
 <p>ORANGE COUNTY SANITATION DISTRICT</p>	<p>SOP-202 (Ver. 6)</p> <p>Incident Reporting and Investigation</p>
<p>Standard Operating Procedure (SOP)</p>	<p>Effective: 1/25/2022 Supersedes: 11/02/2020</p>
<p>Approved By: James D. Herberg General Manager</p> 	

I. Purpose

- A. The Orange County Sanitation District (OC San) is committed to preventing workplace injuries and illness among employees, contractors, visitors, and the public. The purpose of the Incident Reporting and Investigation Policy is to outline the process for reporting incidents and to ensure incident investigations are properly conducted to determine contributing factors and root cause(s) allowing for the proper development and implementation of corrective action(s) to prevent similar or more serious incidents from recurring.
- B. It is OC San policy that:
 - 1. All hazard recognition events, near misses and incidents are immediately reported.
 - 2. Incidents involving non-emergency work-related injuries are reported to Company Nurse first to ensure proper medical care and management.
 - 3. All near misses and incidents are investigated. The level of investigation is based on the severity of the outcome or potential outcomes of the incident or near miss.
 - 4. All investigations result in learning that is communicated to appropriate staff.
 - 5. Some investigations may result in corrective action and/or discipline up to and including termination.

II. Background

- A. OC San has developed this procedure in accordance with the California Occupational Safety and Health Administration (Cal/OSHA) Injury and Illness Prevention Program requirements for investigating occupational injury or illness (Title 8, California Code of Regulations (CCR), Section 3203(a)(5)).
- B. The type of incidents reported and investigated under the Incident Reporting and Investigation Policy include, but are not limited to:
 - Work-related injuries and illnesses resulting in fatality, permanent disability, lost time, restricted duty, medical treatment, and first aid.
 - Near misses
 - Hazard recognition events
 - Vehicle accidents

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- Property damage
- Utility strikes
- Environmental releases and spills
- Regulatory violations
- Lock Out Tag Out (LOTO) violations
- Negligence

C. Incidents incurred by contractors and visitors must be reported and investigated in accordance with this policy and the OC San Contractor Safety Standards.

III. Definitions

Accident - An unplanned, undesired event, not necessarily resulting in injury, but damaging to property and/or interrupting the activity in plant process, maintenance, or construction.

Contractor - A company performing work for OC San under a contract. This includes subcontractors.

Company Nurse – OC San’s nurse line for work-related injuries and illnesses.

First Aid - Any one-time treatment, and any follow-up visit for the purpose of observation of minor scratches, cuts, burns, splinters, and so forth, which do not ordinarily require medical care. Such one-time treatment, and follow-up visit for the purpose of observation, is considered first aid even though provided by a physician or licensed health care professional (PLHCP).

Hazard Recognition – Identification of workplace hazards.

Incident – Unplanned, undesired event that adversely affects completion of a task.

Observation – An observation is an unsafe condition (hazard) that requires corrective action. If not corrected, the hazard could lead to a near miss, incident, or injury. The hazard is generally addressed by the employee who observed the unsafe condition. An example of an observation requiring corrective action is spilled water or coffee on the break room floor. The observer would self-correct by cleaning up the spill. Some corrective actions may require submission of a Maximo or Fleet service request. Please work with your supervisor to determine if a service request is required. For example, a malfunctioning seatbelt on a forklift would not only require the forklift to be tagged out of service, but also submission of a service request so the seatbelt can be repaired. Observation reports can also be submitted to recognize employees who go above and beyond to make the workplace safer.

Near Miss – incident where no property was damaged and no personal injury sustained, but where, give a slight shift in time or position, damaged and/or injury easily could have occurred.

Recordable Injury - Any occupational injuries or illnesses which result in fatalities, regardless of the time between the injury and death, or the length of the illness; or lost workday cases, other than fatalities, that result in lost workdays; or nonfatal cases without lost workdays which result in transfer to another job or termination of employment, require medical treatment (other than first aid) or involve loss of consciousness or restriction of work or motion. This category

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also includes any diagnosed occupational illnesses which are reported to the employer but are not classified as fatalities or lost workday cases.

Reportable Injury - Serious injury, illness, or death, of an employee occurring in a place of employment or in connection with any employment that requires the employer to notify Cal/OSHA of the injury within 8 hours of occurrence. Inpatient hospitalization, beyond medical observation and diagnostic testing, amputations, loss of an eye, or serious degree of permanent disfigurement are automatic triggers for reporting to Cal/OSHA.

Root Cause Analysis - Is a structured approach to identifying the factors that resulted in the nature, the magnitude, the location, and the timing of the harmful outcomes (consequences) of one or more past events to identify what behaviors, actions, inactions, or conditions need to be changed to prevent recurrence of similar harmful outcomes and to identify the lessons to be learned to promote the achievement of better consequences.

Serious Injury or Illness - Means any injury or illness occurring in a place of employment or in connection with any employment which requires inpatient hospitalization for a period more than 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement.

Vehicle - is a device by which any person or property may be propelled, moved, or drawn upon a highway, including devices moved exclusively by human power or used exclusively upon stationary rails or tracks. This includes electric carts and bicycles.

IV. Responsibilities

A. Risk Management

1. Shall develop, maintain, and administer the Incident Reporting and Investigation Policy.
2. Shall maintain incident reports and Cal/OSHA recordkeeping activities.
3. Will coordinate the activities for supplemental incident investigations, if determined necessary.
4. Shall report to Cal/OSHA any serious injury, illness, or death of an employee.
5. Shall update the OSHA 300 log and indicate recordable/reportable injuries on the log and summary.
6. Shall provide training for employees on proper incident investigation techniques to include root cause analysis.
7. Will review the Incident Reporting and Investigation Policy annually and make updates where needed.

B. Managers and Supervisors

1. Shall complete incident investigations in accordance with this policy.

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2. Will be responsible for leading the investigation of an incident to identify contributing factors, root causes, and assignment of corrective actions.
3. Shall communicate the policy requirements with staff.
4. Shall investigate incidents in a manner that is timely and appropriate to the circumstances and severity of the incident.
5. Shall ensure all corrective actions are completed to prevent reoccurrence.
6. Shall periodically (quarterly) remind employees to report incidents, observations, and near misses.
7. Shall advise new and returning employees of the requirement to report all incidents and near misses.
8. Assist employees with submitting electronic incident reports using OC San's incident management system.

C. Employees

1. Shall immediately report incidents and near misses to their supervisor (or manager) and Risk Management.
2. Shall submit the electronic incident reports in OC San's incident management system, Cority, as soon as possible and no later than 24 hours from the time of incident.
3. Shall fully cooperate with management, Risk Management, Human Resources, and subject matter experts participating in the investigation.
4. May request bargaining unit representation during the incident investigation.
5. Shall promptly complete and return all paperwork regarding the incident as required.
6. Shall participate in the investigation of an incident.
7. Shall execute corrective actions as assigned.
8. Attendance during the incident investigation is mandatory unless incapable because of bona-fide injury or illness.

V. Procedure

A. Stop Work Authority

1. All employees, contractors, and visitors have the authority and responsibility to stop work in any situation when the hazards and risks associated with the work being performed is not clearly established or controlled. Work may be stopped until it is determined that it is safe to resume.

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2. Immediately following a near miss or incident, stop work until it is determined that it is safe to resume. If a person sustains a serious injury, or if the incident is classified as a significant near miss, the operation must be stopped, and the investigation initiated immediately.

B. Incident Notification

1. Employees shall immediately report near miss and incidents to their supervisor and Risk Management.
2. Employees shall make injury notifications and response according to OC San Medical Program (SOP-111) and Section VI below.
3. Cal/OSHA requires any serious injury, illness, or fatality that occurs at the workplace regardless of whether it was work-related or not to be reported to the Cal/OSHA District office. Cal/OSHA defines a serious injury as any incident requiring inpatient hospitalization (other than medical observation or diagnostic testing) or in which an employee suffers an amputation, loss of the eye, or any serious degree of permanent disfigurement. Cal/OSHA notifications will be made by the Risk Management Safety and Health Supervisor (or designee), Human Resources and Risk Manager, or Director of Human Resources. These notifications shall be made to Cal/OSHA as soon as practically possible but not longer than 8 hours after knowledge of incident. These reportable injuries must be recorded on Cal/OSHA Form 300. They can be lined out or removed if determined not to be work related.
4. Incidents that result in severe or catastrophic injury or hospitalization, fatality, moderate to server property damage, utility strike, motor vehicle accidents, missing persons, or incidents that generate media coverage, notifications to the following shall be considered:
 - a. Public Affairs Office
 - b. Legal Counsel
 - c. Human Resources

C. Company Nurse Intervention/Case Management

1. Company Nurse shall be contacted for every non-emergency, work-related injury or illness by the OC San employee via the Company Nurse reporting hotline number (877) 518-6702, (search code: OC San) to ensure proper medical management of the injury for the OC San employee.
2. Company Nurse will manage the case along with OC San's Workers Compensation Third Party Administrator (TPA) to ensure the appropriate and effective care is provided for the employee.

D. Investigation Team

1. Investigation Teams will vary depending on the type of the near miss or incident. Recommended members are as follows:
 - a. Near Miss – employee involved, witness, supervisor
 - b. Vehicle Accident – employee involved, witness, supervisor, Risk Management

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- c. Property Damage / Utility Strike – employee involved, witness, supervisor, Risk Management
 - d. Significant Near Miss – employee involved, witness, supervisor, manager, Risk Management
 - e. First Aid – employee involved, witness, supervisor, Risk Management
 - f. Medical Treatment Beyond First Aid – employee involved, witness, supervisor, manager, Risk Management
 - g. Serious Injury or Fatality – employee involved, witness, supervisor, manager, Risk Management, Human Resources
2. Near misses and incidents involving lockout/tagout, confined space, working at elevated locations, machine guarding and barricading, operation of mobile equipment, suspended loads, equipment and pipe opening, hot work, excavations, and NFPA 70E are incident categories that lead to significant near misses, serious injuries, and fatalities. These categories will require a comprehensive investigation, which may lead to discipline up to and including termination.
 3. The members of the Incident Investigation Team shall receive training in conducting an incident investigation.
 4. Subject matter experts (i.e., Engineer, third-party consultant) can be added to the investigation as needed.
- E. Investigation Process
1. Fact Gathering
 - a. Information or conditions that can change with time must be captured immediately. This may include taking pictures of damage before it is repaired and of the work area before conditions change and getting names of witnesses before they leave the area. The longer the delay in examining the incident scene and interviewing witnesses the greater the possibility of obtaining erroneous or incomplete information.
 - b. For minor incidents, the information may be gathered by the supervisor or other involved personnel immediately following the incident.
 - c. The severity or potential severity of the incident will determine when the formal investigation should be initiated.
 - d. Based on the complexity of the situation, this information may be all that is necessary to enable the investigation team to analyze the incident, identify contributing conditions, determine the root cause, and develop solutions.
 - e. More complex situations may require the investigation team to revisit the incident site or re-interview key witnesses to obtain answers to questions that may arise during the investigation process.
 - f. For damaged equipment or property incidents, photographs or videos of the scene should be taken from all sides and from various distances. Sketches or drawings could also be pertinent to the investigation.

2. Starting an Investigation

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- a. The supervisor is responsible for initiating the investigation process. Depending on severity, Risk Management will initiate the investigation process at their discretion.
 - b. The incident investigation is initiated once the area is secure, injured people have received appropriate medical attention, and appropriate notifications have been made.
 - c. During the investigation, an analysis shall be carried out to identify failures or noncompliance with the safety and health management systems. The analysis includes but is not limited to review of safe work procedures, job safety analysis, related safety programs, training records, inspection records, simultaneous operations, equipment records, weather conditions, personnel policies, and procedures, as well as relevant evidence gathered during the course of the investigation.
3. Description of Incident
- a. It is critical to accurately describe what happened. Do not speculate on causes, state the facts. The description should be clear and concise.
 - 1) For example: "Technician opened electrical panel without applying lockout tagout. Technician was not wearing arc flash PPE and did not obtain energized electrical work permit. No injuries were reported".
 - b. Do not use people names when describing the incident. The names of individuals involved can be listed in the Witness and Contacts tab of the incident report.
4. Determining Contributing Factors
- a. Facts can be contributing factors.
 - b. Once all contributing factors have been identified, determine which contributing factor(s) were primary in the event occurring (key contributing factor). Contributing factors are not root causes.
5. Determining Root Causes of the key Contributing Factors
- a. OC San utilizes the Five Why's root cause analysis to explore cause and effect relationships underlying a particular problem. Any near miss or incident may have one or more root causes that will be categorized.
 - b. The Investigation Team will ask questions starting with Why, What, How and/or When until meaningful conclusions are reached.

Example Problem: My car will not start.

 - Why? – The battery is dead.
 - Why? – The alternator is not functioning.
 - Why? – The alternator belt is broken.
 - Why? – The alternator belt was well beyond its useful service life and has never been replaced.
 - Why? – I have not been maintaining my car according to the recommended service schedule.

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- c. They Five Why system is used to uncover issues that may be contributing to the incidents that occur and to identify questionable behaviors identified during an investigation.
 - d. Investigative interviews of witnesses and subjects may be recording to preserve an accurate record of events.
 - e. Root cause categories focus on training or competency, adherence to standards, availability of standards or procedures, communications, tools, equipment, and factors outside of OC San control.
6. Development of Solutions
- a. Each root cause must be addressed by a solution with a responsible person identified.
 - b. The Investigation Team cannot identify a root cause and then make no recommendation to address it.
 - c. The affected managers and supervisors are responsible for implementation of root cause corrective actions recommended by the Investigation Team.
 - d. The affected managers, supervisors, and Risk Management may recommend disciplinary action of involved parties but shall not determine the type or magnitude of the action. This shall remain the responsibility of the employee's direct manager or supervisor and Human Resources.
 - e. After identifying the root cause(s), solutions are developed with a responsible person identified and notified for solution implementation with a set due date for completion.
 - f. Job Safety Analysis (JSAs), policies and procedures, safe work practices, and other safety documentation may require updates to prevent reoccurrence of incident.
 - g. Solutions should be practical, cost beneficial, and sustainable for the long term. The solutions should focus on factors that can be controlled by the individual or supervisor. Effective solutions typically are "SMART" solutions:
 - Specific
 - Measurable/observable
 - Achievable
 - Relevant
 - Timely
7. Review Process and Validation
- a. Review and follow-up on incident investigations is important to verify the effectiveness of the process.
 - b. Quality reviews of incident investigations offer an opportunity to provide positive feedback or constructive advice for continued improvement.
 - c. Employees can follow-up on near miss and incident investigations by verifying that the solutions have been implemented and validating that the solutions have adequately addressed the root cause(s) of the incident.

F. Closeout of Incident Investigation

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1. All near misses and incidents have three levels of investigation/review that must be completed within an appropriate time frame:
 - a. Level 1 - Investigation Supervisor
 - 1) Performed by the supervisor of the person involved or injured.
 - 2) Responsible for formulating the investigation Team and executing the Investigation Process.
 - b. Level 2 – Investigation Manager
 - 1) Completed after the investigation is marked complete by the Investigation Supervisor.
 - 2) Responsible for verifying the investigation is thorough, completed as required by this policy, appropriately identifies the root causes, solutions are identified that will prevent reoccurrence, and solutions are achievable.
 - 3) The Investigation Manager should be involved during Level 1 investigation process.
 - c. Level 3 – Risk Management
 - 1) Performed after the investigation is approved by the Investigation Manager.
 - 2) Risk Management will perform a quality control review of the investigation to ensure that it aligns with federal, state, and local regulations, as well as OC San policy. Risk Management will also ensure that all required fields for data collection and analysis is completed.
 - 3) Risk Management will be involved during Level 1 investigation process.

2. Targeted Time Frames

Near Miss/Incident Type	Investigation Supervisor	Investigation Manager	Risk Management
Near Miss	2 Weeks	1 Week	1 Week
Vehicle Accident / Property Damage	2 Weeks	1 Week	1 Week
Utility Strike	1 Week	1 Week	1 Week
Significant Near Miss	1 Week	1 Week	1 Week
First Aid	1 Week	1 Week	1 Week
Medical Treatment	72 Hours	1 Week	1 Week
Serious Injury or Fatality	72 Hours	48 Hours	24 Hours

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- a. The times listed above are times that the near miss or incident can sit in one's queue. Completion times vary depending on the incident level, but all should be done as soon as possible.
- b. Deviations from the targeted time frames shall be discussed with Risk Management.

VI. Injuries

- A. If the incident is serious and the employee is unable to leave the scene of the incident, help shall be summoned, using the extension 2222 emergency number or the control center for Plant 1 (714) 593-7133 or Plant 2 (714) 593-7677.
- B. The Control Center shall notify the Medical Response Team if the incident is at Plant 1 or Plant 2, and outside medical services as required (911).
- C. The Plant 1 Control Center or Plant 2 Operations Center shall dispatch personnel to meet outside medical services at the front gate as necessary and escort them to the incident site.
- D. The employee or another employee shall notify the injured person's supervisor of the incident.
- E. After the injured person is tended to, an investigation shall be started by the supervisor as soon as possible.

VII. Vehicle Accidents

- A. After a vehicle accident, if safe, stop and determine possible damage. Avoid obstructing traffic if possible. The vehicle shall be moved to a safe location as soon as possible.
- B. Aid the injured and see to it that they receive medical attention as soon as possible by notifying Control Center (onsite – x2222) or contacting local emergency medical service personnel (offsite - 911).
- C. Notify your supervisor or manager of the accident. Supervisor or manager shall notify Fleet Services and Risk Management.
- D. A police report is needed when the incident involves the public or non-OC San property. If the police do not respond, the employee should obtain all pertinent information available from the other driver and the incident scene and then go to the police department with local jurisdiction to file a report.
- E. Identify as many witnesses as possible and obtain their name, address, and home and work phone numbers.
- F. Take pictures of the accident scene, including pictures of every side of the vehicles involved, from a distance, etc.
- G. Do not discuss the incident with anyone other than the police and OC San personnel.
- H. Provide only your name, agency name and address, and work telephone number.

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- I. Obtain a business card from the police officer and ask them to record the accident case number on the card.
- J. The driver, and each employee passenger, and each employee witness should assist in completion of the Vehicle Accident Report (unless involved parties are incapacitated or deceased) during the shift in which the incident occurred. Applicable drug testing requirements for drivers involved in accidents shall apply in accordance with OC San’s Substance Abuse Policy.

VIII. Training

- A. All employees will receive incident reporting and investigation training during the new employee hire orientation.

IX. Recordkeeping

All records created or generated during this procedure shall be legible and stored in a way that they are readily retrievable in facilities or electronic document/content management systems that provide a suitable environment to prevent damage, deterioration, or loss. Records may be in the form of any type of media, such as hard copy or electronic media. The OC San Records Retention Schedule is the official procedure governing the retention, retirement, and destruction of OC San records. Document owners should use these schedules to determine the item and series that best fit their records. Document owners are responsible for ensuring that documents are properly marked, indexed, and filed for their projects or area of responsibility.

X. REFERENCES

California Code of Regulations Title 8, §3203. Injury and Illness Prevention Program

California Code of Regulations Title 8, §342, Reporting Work-Connected Fatalities and Serious Injuries

OC San Personnel Policy, Vehicle Usage, Policy Number 5.19

XI. Revision History

Version	Date	By	Reason
1.0	09/25/2002	N/A	New
2.0	10/26/2005	N/A	Periodic Update
3.0	01/04/2006	Matte, J.	Periodic Update
4.0	04/18/2013	Bauer, Wesley	Periodic Update
5.0	09/15/2020	Frattali, John Hachim, Sabrina	Periodic Update – Refer to Program Change Log
6.0	12/07/2021	Huynh, Brian	Annual Program Update – Refer to Program Change Log