Incident Management Procedure

July 2024

Purpose

The Incident Management Procedure outlines the Ontario Tech University's procedure (Hereafter known as "the procedure") for managing employee incidents that occur on Ontario Tech University's premises and workspaces. An effective incident management procedure builds on risk management principles and ensures that:

- Occupational incidents, including near misses, are reported, and investigated in a timely and effective manner.
- Corrective actions are appropriately identified, implemented, and monitored to prevent recurrence.
- There are no gaps in legislative compliance.

This procedure does not outline the independent requirements and potential risks or challenges specific to any projects, workspaces, or situations, but rather intends to serve as a framework to build a specific approach for managing the applicable risks or incidents.

Scope

This procedure applies to Ontario Tech University's employees.

Definitions

Corrective Action

Proactive actions taken to prevent incidents, hazards or non-compliance before they occur, or actions taken post-incident with the intention to prevent recurrence.

Critical Injury (per O. Reg. 420/21)

An injury of a serious nature 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 or foot but not a finger or toe,

(f) consists of burns to a major portion of the body, or

(g) causes the loss of sight in an eye; ("gravement blessé")

Hazard

Any source of potential damage, harm or adverse health effects on someone or something.

Incident

An unwanted and unplanned event that may or does result in injury, illness, equipment or property damage.

Lost Time

When a worker suffers a work-related injury/disease which results in the worker being off work past the day of accident or a loss of wages/earnings.

Medical Aid

The services of a health professional, as defined by the Workplace Safety and Insurance Board (i.e. physician, physiotherapist, chiropractor, dentist).

Near Miss

A work-related condition, incident or unplanned event that did not result in injury, illness, equipment, or property damage but had the potential to do so.

Occupational Illness

A condition that results from exposure in a workplace to a physical, chemical or biological agent to the extent that the normal physiological mechanisms are affected, and the health of the worker is impaired thereby and includes an occupational disease for which a worker is entitled to benefits under the *Workplace Safety and Insurance Act, 1997.*

Risk

The chance or probability that a person will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss, or harmful effects on the environment.

Risk Control

The elimination or reduction of risk associated with an identified hazard.

Workplace

Anywhere University employees conduct work, including work environments in the field and teaching or research facilities shared with other organizations.

Roles and Responsibilities

Environmental Health and Safety Officer (EHSO)

- Within 48 hours of receiving the Accident Injury Report, investigate the issue and submit a Form 7 to WSIB and inform the Health and Disability Management Specialist.
- Maintain contact with the employee regarding their health condition.
- Manage employee's WSIB claim/file.
- Provides technical and best practice recommendations.
- Follows up on incident and investigation reports and corrective actions.
- Reports required incidents to the Workplace Safety and Insurance Board (WSIB) and the Joint Health and Safety Committee(s)(JHSC).
- Notifies the Ministry of Labor, Immigration, Training and Skills Development (MLITSD) and the JHSC of reports of critical injury or occupational illness.
- Notifies senior management of any workplace fatality or critical injury.
- Liaises with external government agencies, where required.

Supervisor/Manager

- Ensure that the Accident Injury Form is completed 24 hours of becoming aware of the injury.
- Respond to incidents immediately, including obtaining emergency medical attention for a worker, if necessary.
- Ensure proper record and submission of the Accident Injury Form.
- Conduct incident investigations alongside Environmental, Health and Safety Officer.
- Identify causes and corrective actions for hazards.
- Implement corrective actions to eliminate or reduce hazards.
- Address workplace hazards or potential health and safety concerns, as identified through workplace inspections or by workers.
- Request additional assistance or expertise from the Environmental, Health and Safety Officer (EHSO) as needed.

Employee

- Promptly report all incidents, hazards, injuries, or occupational illnesses to their supervisor, including near misses.
- Submit the Accident Injury Form promptly after the incident.
- Participate in incident investigations to assist in identifying causes and corrective actions.
- Provide to the Health and Disability Management Specialist copies of written medical limitations and restrictions from health care practitioners when medical treatment for injuries is received to support return-to-work planning.

Health and Disability Management Specialist

- Assist with confirming employee personnel details for WSIB reporting.

- Facilitate coverage of injured workers' duties by engaging with Recruitment Specialist as needed.
- Assist with creating, implementing, and monitoring the return-to-work program as needed.
- Manage workplace accommodations when required for employees returning to work or requiring modified duties following an injury.

Total Rewards Administrator

- Notify Sun Life of any changes to employees' pension or benefits.

Legal Requirements

The Ministry of Labor, Training, Immigration, and Skills Development (MLITSD)

Always call 911 in an emergency.

1. If someone is killed or critically injured at the workplace, **you must immediately notify:**
- The Ministry of Labor, Immigration, Training and Skills Development's Health and Safety Contact Centre at 1-877-202-0008.
- The Joint Health and Safety Committee
- The Union of the injured worker.

This must be followed for everyone, including employees, students, contractors and visitors.

A written report of the incident must be provided to the MLITSD, the JHSC, and trade union **within 48 hours.** Follow these instructions to submit a written report.

2. If a person is injured and unable to do their usual work or requires medical attention because of an accident, explosion, fire or incident of workplace violence, **a written notification must be submitted to:**
- the Joint Health and Safety Committee (JHSC)
- The Union of the injured worker.

- The written notification must be given **within four days of the incident.** The ministry does not need to be notified unless an inspector requires it.

3. If a worker has an occupational illness, you must submit a written notice within four days of being advised to:
- The Ministry of Labor, Immigration, Training and Skills Development
- The Joint health and safety committee
- The Union of the injured worker.

The Workplace Safety and Insurance Board (WSIB)

A workplace injury must be reported to the WSIB if the worker:

- Needs treatment form a health professional (beyond first aid), or
- Is not able to go to work, or
- Is being paid less or receiving fewer hours of work.

An injury **does not** need to be reported to the WSIB if **all three** of the following apply:

- Only first aid treatment is needed, and
- No time off was taken, and
- Pay was not affected.

Follow the WSIB reporting processhttps://www.wsib.ca/en/businesses/claims/report-injury-or-illness.

Procedure

Incident & Injury Reporting

For purposes of incident reporting within the University, a reportable incident is one which:

a. Results in personal injury (including injuries requiring first aid or an occupational illness), lost time from work or property damage;
b. Has the potential to result in personal injury or property damage even though no injury or damage actually occurred;
c. Involves a fire or explosion;
d. Occurs to any employee on university premises;
e. Occurs to a university employee during the course of their work either on or off university premises;
f. Occurs to a student during the course of their classroom, laboratory, or field work;
g. Occurs to a student during the course of a work placement (either paid or unpaid) which forms part of their university curriculum;
h. Occurs during the course of athletic activities taking place on university premises or off university premises when under the sponsorship of the university.

1. All staff are responsible for ensuring that all accidents/incidents involving themselves, their students or visitors are reported according to this procedure. Students are responsible for ensuring that accidents/incidents involving themselves are reported.

2. All “reportable incidents” must be reported within 24 hours using the electronic Accident Injury Report form.

3. Copies of the form are sent to the EHSO, the injured person, and the injured person's supervisor. In the case of a student, a copy is sent to the Director, Risk Management.

4. In the case of a "critical injury", the priority is to obtain prompt treatment for the individual involved. Call 911, contact Campus Security at 905.721.3211, or the Campus Health Centre at 905.721.8668 x3037. After appropriate treatment has been given, complete the Accident Injury Report form.

5. The Human Resources department is responsible for informing the MLITSD, JHSC and the Union of the injured worker of the injury.

6. The EHSO is responsible for reporting to the WSIB and following up on claims.

7. The Human Resources department is responsible for preparing a monthly report to the JHSC on all workplace accidents/incidents.

8. In the case of an accident involving an employee, the employee's supervisor is responsible for promptly investigating the circumstances of the accident (Refer to Incident and Injury Investigation) and completing an Incident Investigation Form with the EHSO's support. In investigating the accident, the EHSO should (if possible) inform the worker co-chair of the JHSC to assist in the investigation. This report is to be sent to the JHSC and the Dean of the Faculty (if applicable) by the EHSO.

9. Any injury to any other person on the University campus shall be investigated at the discretion of either co-chair of the JHSC. The committee shall review the circumstances of the accident and make any recommendations for preventative measures to the appropriate person in the University.

Incident and Injury Investigation

The purpose of an incident investigation is to find out what happened during the incident, why it happened, and determine what steps should be taken to prevent a recurrence. To be effective, the active participation of supervisors and workers is essential. The investigation is intended to uncover contributing factors and root causes, which may not be immediately evident upon initial review of the incident. The scene of the incident should not be disturbed so a thorough and accurate investigation can be performed.

In the case of a critical injury or fatality, the scene of the accident must not be disturbed until approval from a Ministry of Labor inspector is given, and if applicable, law enforcement personnel.

In the case of minor to moderately severe injuries, a thorough investigation must be conducted by:

1. Conducting an interview with the injured employee, their supervisor, and/or witnesses, if applicable.
2. Collecting objective data from other sources.
3. Identifying root cause(s).
4. Identifying corrective actions to prevent recurrence.

1. Interviews

It is best practice to interview those involved in the incident (i.e. injured worker, supervisor, witnesses, etc.) separately to provide them with a non-threatening, distraction-free environment. The investigator should ask open-ended questions that allow the respondent to answer to the best of their recollection, experiences, and thoughts.

Try asking a series of questions that can reveal detailed facts about the problem:

- **What** – what is the complaint? What equipment was being used, what work, or task was being conducted? What is the impact or extent of the incident (injury, lost time, equipment downtime, reduced output, etc.)?
- **Who** – who was involved in the incident? Who was injured or affected? Did anyone see what occurred? Describe the situation witnessed.
- **When** – when did the event occur? At what time? During what part of the process?
- **Where** – where exactly on campus did the incident occur? In which building, faculty, service, department, room, etc.?
- **How** – how did the incident occur? How was the equipment or individual affected? Describe the injuries or the impact of damage.
- **How much / many?** – how many individuals or components were affected?

When collecting information during interviews, remember to keep the following key points in mind:

1. **Protect the confidentiality of any injured person.** A workplace injury or illness can be a very sensitive topic. While fulfilling your responsibilities, you may become privy to

confidential or private information, which you must be careful to protect and not share or disclose to unauthorized personnel. The information must only be shared on a need-to-know basis.

2. **Avoid accusatory questions.** It is common for people to feel ill-at-ease during an investigation. The goal of the investigation is to identify the factors that caused the incident, not to identify who caused the incident. Although critical questioning can help you understand a particular situation, be especially careful when asking "why..." questions, which could be interpreted as accusatory by the interviewee. Maintain the focus of the investigation on identifying the facts and causes of the incident.
3. **Avoid leading questions.** A leading question is one that is worded such that it produces a desired response. Leading questions generally do not aid the investigation and should be avoided at times. For example:
    a. "How fast was the red car going when it crashed into the black car?"
    b. "How fast was each car going when the incident occurred?"

Question a. leads a respondent to the conclusion that the red car hit the black car and thus caused a vehicular accident. Question b. does not speculate on what occurred and asks the respondent to specify. Question b. is neutral and allows the respondent to answer with what they observed. Conclusions can be drawn following the response; therefore, Question b. is preferred.

4. **Confirm your understanding with the interviewee**. Repeat what the interviewee states to confirm your understanding of the situation.
5. **Maintain records.** Keep written documentation of actions, decisions, and convers.

2. Data Collection

1. Visit the scene, if possible, take photos of the area and any hazards
2. Check environmental conditions which may have contributed to the incident (weather, temperature, etc.)
3. Contact the Office of Campus Safety for CCTV footage. Observe the footage from a hazard identification point of view.
4. Consult reports, documentation, inspections, and training records which pertain to any equipment, environmental factor and/or behavior related to the incident.

3. Root Cause Analysis

Once the investigator has collected as much information about the incident as possible, they must sift through the data. During the analysis, the investigator may notice several situations that, while relevant to the workplace, may not necessarily be linked to the incident. While unrelated findings are not necessarily a negative outcome, and should be recorded to be addressed later, a good investigation should concentrate on the abnormalities and hazards that contributed to the incident for which the investigation has been convened.

To determine if an abnormality or hazard is part of the incident, the investigator needs to ask whether the incident would have occurred in the same manner had the abnormality or hazard

not been present. If the answer is no, then the abnormality/hazard is indeed a contributing factor and should be addressed or corrected.

The Five "Why" approach

- Ask Why the incident occurred. Consider both why it happened and why the situation was not prevented or detected before it became an incident or near-miss.
- Continue to ask the question "Why?" until you get down to the root cause(s).
- Consider all possible causal factors:
    - Task (e.g. were safe work procedures available? being follow?);
    - Materials (e.g. was there an equipment failure? Equipment right for task?);
    - Personal (e.g. adequately trained? Physical health, stress); and
    - Management (e.g. adequate supervision, maintenance program in place)

Types of Hazards

Once the investigator has analyzed the data and focused on incident-related items, the investigator can then identify the incident hazards.

Although there are many different types of hazards, they can be broken down into five (5) main categories:

- **Chemical** – conditions that can lead to contamination by harmful or potentially harmful substances. Examples include toxic gases, noxious fumes, corrosive liquids, or powders, etc.
- **Biological** – conditions where living organisms can pose a threat to human health. Examples include syringes carrying potentially infected blood, specimen containers with potentially infected materials, viruses spread by HVAC systems, etc.
- **Physical** – conditions in which objects, materials or structures can cause material or bodily harm. Examples include objects or substances that are flammable, explosive, noisy, conduct electricity (shock), or hazardous environments involving extreme hot or cold, radiation, slippery surfaces, low ceilings, etc.
- **Biomechanical** – conditions that cause biomechanical (body and movement) stress on workers. Examples include body mechanics, workbench height, chair design, workstation set-up, etc.
- **Psychosocial** – conditions that can affect the thoughts, behavior, and mental well-being of workers. Examples include stress from using equipment without proper training or instruction, or from being coerced into using defective tools or materials; burnout or depression from constant exposure to high-stress situations, etc.

Incident Causes

Causes and contributing factors can be further categorized to help summarize and prioritize corrective actions, including:

- **Materials** – includes the failure of equipment and/or tools used during the task, the design of equipment, loading/unloading processes, etc.
- **Environment** – includes the physical work environment, and especially sudden changes to that environment. The situation at the time of the incident is important,

not what the "usual" conditions were. Environmental conditions may include weather, general workplace housekeeping, brightness, noise, hazardous materials, etc.

- **Personnel** – includes the physical and mental condition of those individuals directly involved in the incident, as well as the psychosocial environment they were working in. Causes may include lack of training, individual fitness for work, use of protective devices and equipment, violation of established procedures, acts of others, etc.
- **Management** – includes the role, presence of, and implementation of management systems. Management system failure may be found to be the direct or indirect cause of incidents and may include the lack of established procedures to safely perform work, inadequate supervision, improper hazard identification, or equipment maintenance, etc.
- **Task** – includes an examination of the actual work procedure at the time of the incident and the way it was conducted, the technique used by the worker, the design of the process, etc. Examples of such causes are listed in the Supervisor Investigation Form.

Corrective Action Considerations

Once the root cause(s) has been identified, corrective actions must be identified that address the root cause(s) of the incident. Partnership with supervisors and managers to develop corrective actions will ensure feasibility and help establish timelines and target completion dates. Corrective actions must always be supported by senior management (Director, Dean, etc.)

The supervisor of the injured employee must identify corrective actions and set a reasonable timeline within which to implement actions.

The principal criteria for choosing corrective actions are:

- **Stability and durability**: actions should be reliable and permanent to the extent possible.
- **Practicality**: actions should blend readily into work processes and not increase workloads.
- **Implications**: actions should not have negative repercussions or side effects.
- **Scope**: actions should apply to the largest possible number of workstations or areas
- **Speed of implementation:** actions should be implemented in a reasonable time.
- **Quality control**: actions should lend themselves to easy evaluation and control.
- **Cost**: actions should be reasonably cost effective.

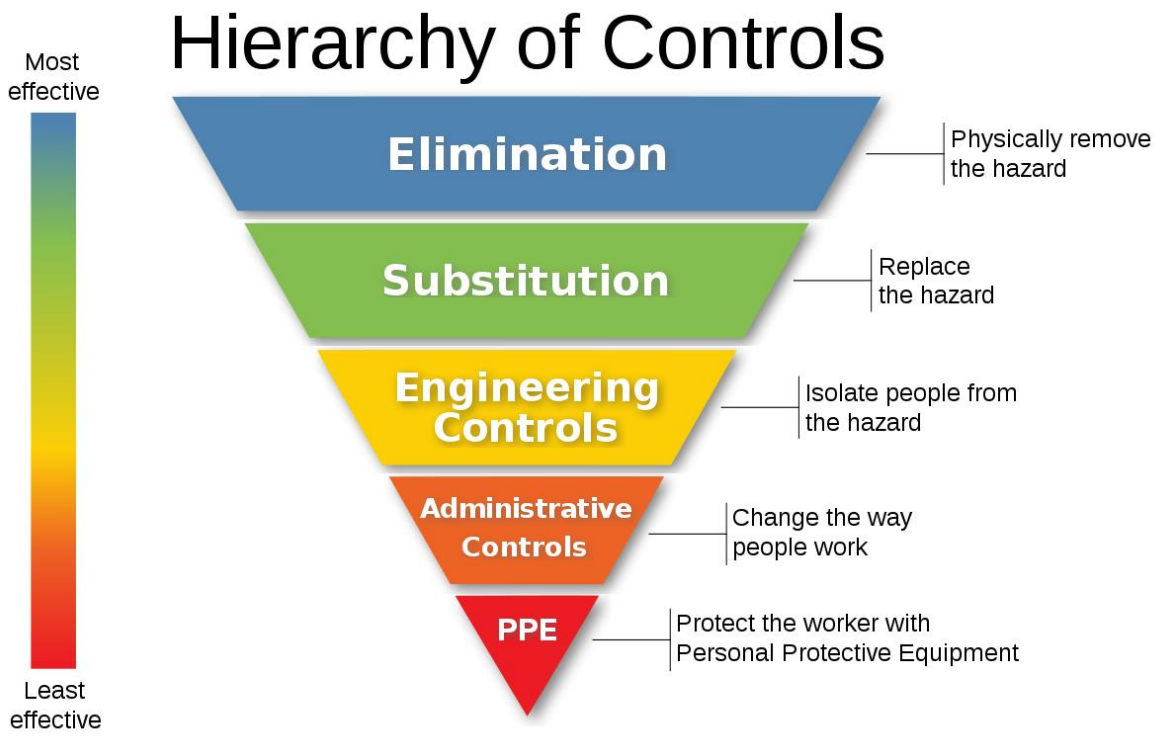

Figure 1. Hierarchy of hazard controls.

The hierarchy of controls is a step-by-step approach to eliminating or reducing workplace hazards. It ranks controls from the most effective level of protection to the least effective level of protection. When choosing a control method, start from the top of the inverted pyramid. Assess the feasibility of the first layer of controls (elimination) before moving on to the second layer (substitution). Continue this process until you reach the bottom of the pyramid and have identified as many controls as needed to adequately protect the worker from the hazard.

1. Elimination

Elimination is the first level in the hierarchy of control and is considered the most effective way to control a hazard. This involves completely removing the hazard from the workplace. By eliminating a hazard all together, any potential harm or injury is prevented from happening.

Example: If a machine is causing excessive noise, it can be eliminated by replacing it with a noiseless model.

2. Substitution

Substitution is the second most effective method of controlling a hazard. This involves replacing a hazardous material, ingredient, or piece of equipment with a less dangerous one. The idea is to replace an occupational risk with something that has no risk or very little risk.

Example: If a chemical is causing skin irritation, it can be replaced with a less irritating chemical.

3. Engineering Controls

Engineering controls are the third level of control. Engineering controls involve isolating a hazard or changing the way a task is performed to reduce exposure to a hazard. This often involves adding safety measures to make the work easier such as installing machine guards.

Example: Installing ventilation to remove fumes from the air is an example of an engineering control.

4. Administrative Controls

Administrative controls are the fourth level of control. Administrative controls involve changing work practices or adjusting work tasks to reduce exposure to a hazard. This may involve making changes to operational processes, work schedules, or introducing signage or warnings in the workplace.

Example: Requiring employees to take breaks every 20 minutes when working with a loud machine is an example of an administrative control.

5. Personal Protective Equipment (PPE)

Personal protective equipment (PPE) is the fifth level of control and is the least effective method of controlling a hazard. PPE should only be used as the last line of defense and when other methods of control are not possible or effective.

Example: PPE includes clothing, gloves, and other items that protect the body from exposure to a hazard.

Process Revision	
Date Reviewed	**Reviewer**
May 31, 2024	Taimur Iqbal, Environmental Health and Safety Officer
June 12, 2024	Elise Arbic, Manager, Health and Wellness
July 8, 2024	Taimur Iqbal, Environmental Health and Safety Officer