	Incident Investigation & Reporting				
Control number:	HSE-P-20	Revision date:	9/16/2024	Rev #:	0
Approved by:	Derrick Landry	Revised by:	Madison Myers	MOC#:	N/A


PURPOSE

The purpose of this program is to establish procedures and assign responsibilities for reporting and investigating work related accidents and incidents.

1.0 GENERAL INFORMATION

- A. Peak NDT Solutions related incidents will be investigated to the appropriate level with regards to incident severity. The Company's "Root Cause Analysis" (RCA) process shall be used for all injuries requiring medical treatment, high risk near miss incidents, fires, property damage, spills and workplace violence occurrences. All Supervisory personnel shall be trained in incident investigation & reporting procedures prior to occurrence of an incident.
- B. Near Miss incidents shall be ranked using the following severities:
 - **High Risk:** Potential to cause bodily injury resulting in medical treatment, property damage and/or environmental damage above \$1,000.
 - **Low Risk:** Potential to cause bodily injury resulting in first-aid treatment, property damage and/or environmental damage less than \$1,000. *Note: A Near Miss Report or Behavioral Observation Card shall be completed for all low risk near miss incidents.*
- C. Reporting of the incident shall occur using the following sequence:
 1. For Emergencies, Call 911;
 2. Notify the Onsite Supervisor;
 3. Contact the Operations Manager;
 4. Contact the Company's HSE Manager;
 5. The following shall be verbally reported to OSHA within 8-Hours: work-related fatalities, work-related inpatient hospitalization of one or more employees, work-related amputations and work-related losses of an eye
 6. Report all relative incidents to the Owner/Client within 24-Hours, including, but not limited to, injuries, spills, property damage, fires, explosions and vehicle damage


Note: The above reporting sequence shall be posted at all facilities.
- D. All reported accidents and injuries shall be investigated and documented. Prompt and immediate care of the individual(s) affected and the remediation of a condition which could facilitate other injuries shall take precedence over the investigation process.

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- E. In the event of a serious injury, multiple injuries or a fatality, the area where the incident occurred must be secured from inadvertent tampering by an unsuspecting employee or person. It is important that all things remain as they are, except for the necessity to shut off power. Initial identification of evidence immediately following the incident might include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise and ventilation, and physical factors such as fatigue, age, and medical conditions.
- F. All work in the affected area will cease until such a time as it has been determined it is safe to resume activities.
- G. All preventative measures shall be taken in order to avoid a recurrence and to prevent any other injuries in the respective area.
- H. Employees shall report any Near Miss incident, which could have resulted in an injury or property damage, but did not.
- I. Supervisors shall complete the appropriate accident report form(s) to report occupational injuries, and/or illnesses.
- J. Any witnesses (employee or not) will be requested to write a statement in order to testify to the facts of an incident when it happens. This information will be taken into consideration while performing the root cause investigation.
- K. As required, a Federal or State First Report of Occupational Injury or Illness form will be completed within (2) two working days.

2.0 THE ACCIDENT INVESTIGATION


- A. The purpose of an investigation is to identify the real cause of the incident and recommend changes to prevent future incidents.
- B. All investigations are to be fact finding not fault finding. However, individuals involved in job related accidents or who has sustained a job-related injury due to negligence, will not be relieved of his individual responsibility for causation.
- C. All investigations will be conducted at the closest possible instant after the respective incident has occurred.

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- D. All investigations will be documented with findings clearly definable.
- E. Drawings, points of reference and/or measurements shall be incorporated into the investigative report for clarity when practical.
- F. An investigation shall **not** be hurried, but shall take no more time than is necessary to obtain all facts relevant to the incident. All written incident reports shall be prepared and include an incident report form and a detailed narrative statement concerning the events. The format of the narrative report shall include an introduction, methodology, summary of the incident, the investigation member names, narrative of the event, findings and recommendations. Photographs and witness statements shall also be included.
- G. The incident investigation shall result in corrective actions. Personnel shall be assigned responsibilities relative to the corrective actions and these actions shall be tracked to closure to ensure hazards will be corrected in a timely manner. Lessons learned shall be reviewed and communicated and changes to any process must be placed into effect to prevent reoccurrence or similar events. The overall incident investigation, implementation of corrective actions and communication of the incident shall be completed within 7 days or less.

3.0 INVESTIGATION PROCEDURES


- A. Identify the area in which the incident occurred.
- B. Isolate the hazard or the area if possible.
- C. Identify the agent, equipment, person(s), or act, which most likely caused the incident to occur.
- D. Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations and use of trained interviewers shall be detailed. The need for follow-up interviews shall also be addressed.
- E. Make notes of time, weather conditions, noticeable hazards, etc. Never trust important details to memory. Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging and impoundment of documents and equipment.

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- F. The information gathered shall be accurate, factual, completed and recorded.
- G. Obtain a statement from the injured employee unless the injury requires immediate medical attention, then obtain the statement when the opportunity presents itself. A statement from all persons directly involved with the incident is important to attain.
- H. Determine the facts relevant to the incident by answering the questions who, what, when, why and how.
- I. Warn others to stay clear by the use of signs, barriers or by use of an employee who has been assigned to secure the area.
- J. Notify management and/or customer representative immediately if the condition continues to exist and/or remediation thereof is difficult to accomplish.
- K. Determine how the incident could have occurred based upon the circumstances, as they presently exist.

4.0 TRAINING

- A. Peak NDT Solutions supervisors shall be trained annually in their responsibilities regarding awareness, First Responder roles and incident investigation techniques. In addition, all Supervisors will be trained in "Medic First-Aid / CPR" to control the degree of loss during the immediate post-incident phase. Peak NDT Solutions ensure that proper equipment will be available to assist in investigating, including pens, paper, tape measures, cameras, PPE and caution tape. All incident reports shall be submitted within two (2) working days outlining the occurrence (fatalities require written reports be submitted within twenty-four (24) hours).
- B. After immediate rescue of injured personnel, actions to prevent further loss shall occur. Maintenance personnel shall be summoned to assess the integrity of Company owned facilities and/or equipment issues. A 3rd Party agency shall be used to evaluate all other special response requirements such as safe rendering of hazardous materials.
- C. Secure a means for post-accident drug testing within twenty-four (24) hours of incident.

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REVISION INFORMATION

This is applicable to changes made to the current version of the preceding document.

Revision Number	Description