**Safe Work Requirement**

Incident Management Procedure

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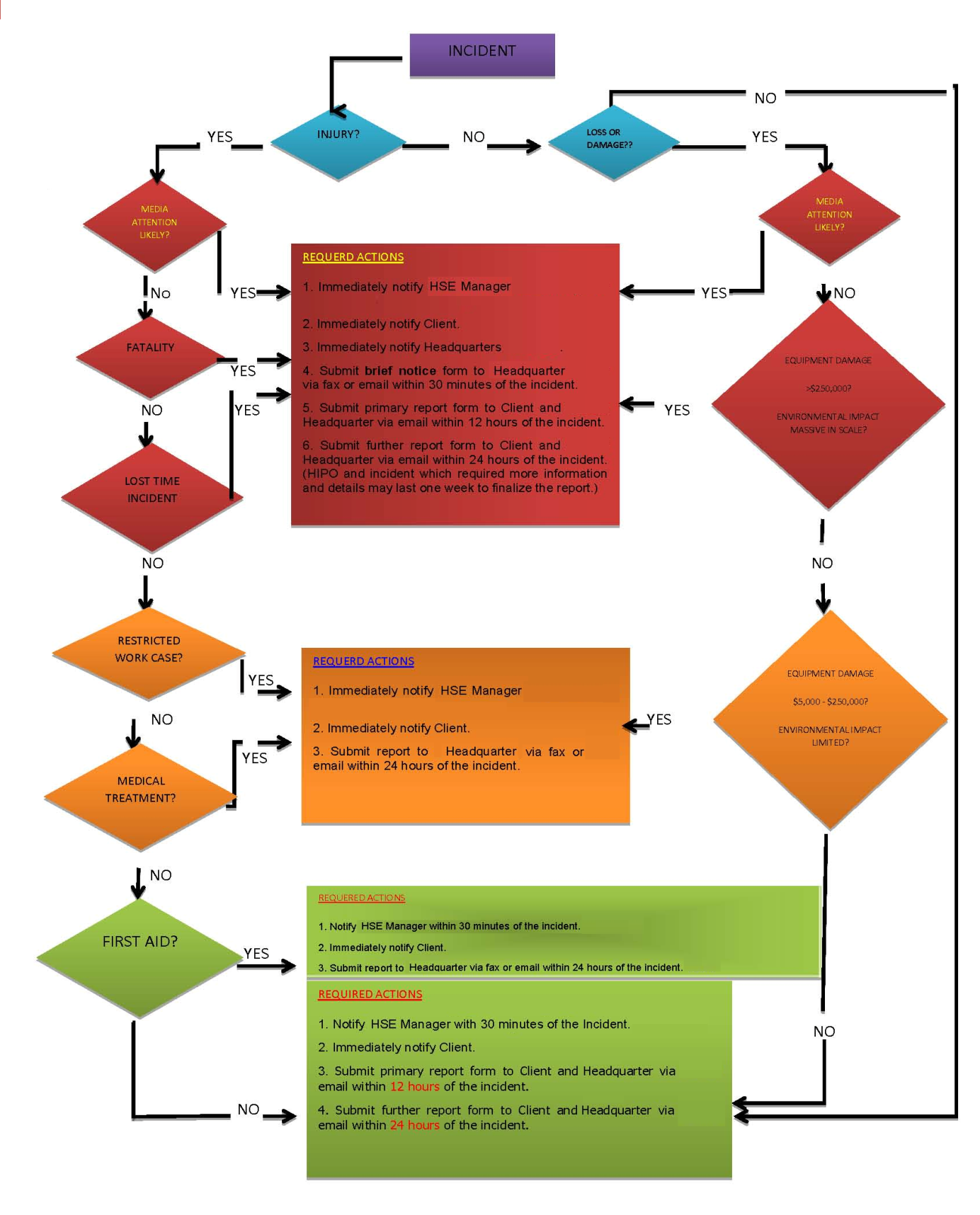
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| POLICY ECDC is committed to maintaining a workplace in which safety is part of everything we do and is as important as anything we do. One expression of our commitment to safety is this Incident Reporting and Investigation Policy.  It is a ECDC policy that:   1. incidents that did or could have resulted in injury, damage or loss shall be reported and investigated in a timely manner; 2. the investigation shall identify all causes and contributing factors; 3. corrective or preventive actions shall be identified and implemented in order to prevent recurrence.  PURPOSE One of key targets in ECDC HSE Management is to prevent incidents and improve our safety performance by requiring the identification and correction of unsafe work practices, and system and facility deficiencies that could result in incidents that may result in employee injury.  In the course of ECDC operations unplanned incidents occasionally occur that could or do result in injury, damage or loss.  The purpose of procedure is to promote the understanding and awareness of safety through better reporting, investigation and follow up of incidents in all ECDC Operations. This procedure explains when an incident shall be reported, the level of ECDC management involvement in incidents and the completion of the necessary forms required by the ECDC. Incident data is collected, systematically analyzed to identify trends in order to prevent repeated loss exposure, and communicated to promote the improvement of safety performance throughout ECDC operations and assister operations internationally. APPLICATION / EXCEPTIONS This Procedure applies to all ECDC facilities/operations and employees. There are no exceptions to ECDC Incident Reporting and Investigation policy.  This procedure applies to the reporting, documenting, investigation, statistical computation, analysis, and follow-up of incident information.  The requirements of this procedure shall be observed by all ECDC personnel engaged in the tasks of incident reporting, investigating, information processing, and information analysis. INCIDENT DEFINITION AND CLASSIFICATIONDefinition  1. **Incident**   An unplanned event or occurrence that affects or has the potential to affect the health or safety of:-   1. people 2. assets 3. the environment 4. **Incident investigation**   The methodical examination of an incident. Incident investigation activities are directed toward identifying the facts and circumstances related to the event, determining the causes, and developing remedial actions to control the risks.   1. **Fatality (FAT)**   Death due to a work related incident or illness regardless of the time between injury or illness and death.   1. **Lost Time Injury (LTI)**   LTI stands for lost time injury incident, which is defined as an injury or illness where an employee or contractor is unable to return to work on the next working day following a work related injury or illness.   1. **Restricted Work Case (RWC)**   Work related injury or illness that renders the injured person unable to perform all normally assigned work functions during a scheduled work shift or being assigned to another job on a temporary or permanent basis on the day following the injury.   1. **Medical Treatment Case (MTC)**   Work related injury or illness requiring more than first aid treatment by physician, dentist, surgeon or registered medical personnel.   1. **Near Miss**   A Near Miss is an event where no contact or exchange of energy occurred and thus did not result in personal injury, asset loss or damage to the environment.   1. **Unsafe Act or Condition**   Any act or condition that deviates from a generally recognized safe way or specified method of doing a job and increases the potential for an accident. Classification  |  |  |  | | --- | --- | --- | | **CLASS** | **DESCRIPTION OF INCIDENT** | **APPLICABLE LOCATIONS FOR ALL INCIDENTS** | | **Class I (one)** | Fatality of ECDC employee, subcontractor or third party employee. | An incident which occurs while working at rig site, yard, or facility…  AND/OR  An incident which occurs at a place which is considered to be under the prevailing influence of ECDC…  AND/OR  An incident which involves property, equipment or vehicles owned or controlled by ECDC. | | Lost Time Incident (LTI) with probable hospital confinement of ECDC employee, subcontractor or third party employee. | | Equipment or property damage or loss in excess of 50,000. USD. | | Environmental damage that is major to massive in scale or would cause considerable to major public concern. | | **Class II (two)** | LTI with no probability of hospital confinement, Restricted Work Case (RWC), Medical Treatment Only (MTO), and Alleged (ALD) incidents involving a ECDC employee, contractor, or third party employee. | | Equipment or property damage or loss in excess of 10,000. USD but less than 50,000. USD. | | Environmental damage greater than slight leaks or spills which may have minimal environmental effect, negligible financial implication and are contained and cleaned up locally on site. | | **Class III (three)** | Any incident which results in a measurable impact of any kind yet is lesser in impact than a Class I or Class II incident. Includes First Aid Cases (FAC), Information Only (IFO), Personal Illness, slight equipment or property damage/loss (less than 10,000. USD), and minimal leaks or spills. | | **Class IV (four)** | Near Miss (NM) incidents and unsafe acts/conditions. This category includes conditions which, if left unchecked, could result in an accident. | | **Class V (five)** | An incident in any other class (Class I-IV) which could attract media attention regardless of actual damage. |  INCIDENT REPORTABILITY AND RESPONSIBILITIES In all ECDC Operations; ALL INCIDENTS ARE REPORTABLE. However, the timing and level of the reporting of an incident varies with the actual and potential consequences. Rig Manager (or Person in Charge) must comply with the instructions detailed in this procedure. Employees shall supply accurate witness information, as required, to line management.     Managing an Injury Any injury should be immediately cared for at a level dictated by the injury or potential impact to the injured person(s). Should it become necessary to transport the injured person(s) to a medical facility off location, every effort should be made to keep the person(s) comfortable and to ensure that they will not be adversely affected by transportation. In addition, ECDC rig medic should accompany the injured person(s) to ensure that they receive the best care available. Restricted/Modified/Alternate Work Following Injury Every effort should be made to allow a ECDC injured worker to remain within the workforce to ensure his ability to take part in current training programs or other meaningful alternative duties while they are recovering. This may be accomplished by informing the treating rig medic that ECDC will make accommodations for the employee within the medical guidelines set out by the rig medical. Responsibilities  1. **Contractors** 2. Shall Report all incidents to their supervisor; 3. Investigate all incidents as required and make results available to ECDC Contract Administrators/ Holders upon request. 4. **Employees** 5. Employee must ensure that ALL incidents are reported. The crew is generally the first responder in case of emergency and as such must immediately take action to notify the Driller, Tool pusher, HSE Supervisor or Rig Manager to begin the appropriate emergency response. Crew shall provide other information when necessary. 6. report all incidents in accordance with the ECDC Incident Reference Chart. 7. cooperate during the Incident Investigation process; 8. participate in an Incident Investigation as required. 9. **Site Supervisors (Drillers, Mechanics, Electricians, HSE Supervisor)**   ECDC Supervisors must ensure activities are secure and then take necessary action, based upon the type of incident. Drillers, Mechanics, Electricians and HSE Supervisor are the first line supervisor responders for the incident and shall notify Rig Manager or Tool pusher of the incident.   1. · notify rig manager of all incidents as soon as possible; 2. · participate in the Incident Investigation as required. 3. **Rig Manager**   Rig Manager shall ensure the incident site is secured, if required (based upon the type of incident). All incidents require notation on the daily HSE Report form. All additional forms & documents related to a given incident shall be completed immediately and forwarded to the ECDC HSE manager as soon as possible. If an incident, believed initially to be Class III, turns into a Class I or II incident then the reporting requirements for the new class apply immediately. The client’s representative must also be notified of the incident and provided with a copy of the incident report.   1. **HSE Manager**   ECDC HSE Manager shall inform General Manager of incident, based upon type of incident. The DESIGNATED team leader for investigations along with the HSE Department shall begin the investigation, when required, as soon as possible.   1. **HSE Department**   The HSE Department shall participate with the related department in the incident investigation and analysis. HSE department shall also provide assistance to the Rig Manager / Tool pusher by ensuring the reports are completed correctly. HSE Department shall also ensure all reports are provided to ECDC General Manager.   1. **General Manager**   General Manager shall ensure that incidents are reported to the Headquarters HSE & Operation Department of ECDC.  General Manager shall ensure the proper report to client or client authorities are notified when required.  General Manager shall ensure investigations and analysis are completed as required.  General Manager shall ensure all corrective actions and follow up activities on the incident are carried out as required. INCIDENT REPORTING PROCEDURES    Incident Reporting – Overview Proper reporting of all incidents is critical for maintaining a safe working environment for all ECDC employees. All incident reporting should be:   1. **Accurate** – Accurate incident reporting ensures that all levels of management receive a clear, detailed description of the incident and its consequences. Incidents should be reported according to BSA-ECDC-HS-CL-O006-01-Initial Incident Notification Form V 1.0. Every effort should be made to provide a thorough and understandable description of the incident, and the accuracy of all facts, information, and details requested in the report form. The reader should be able to “see a picture in their mind’s eye” of what took place. 2. **Complete** – The form used for incident reporting provides information essential for the proper recording and processing of incidents, statistical tracking of information, and analysis of HSE performance. ALL sections of all required forms should be completed in their entirety. 3. **Timely** – Timely reporting of all incidents is essential for efficient management response, initiation of an investigation (if required), development of corrective actions, and distribution of safety information to all ECDC operations. Every incident should be reported toECDC line management according to the **APPEENDIX2 Incident Reporting Instructions Flowchart** 4. **Closed Out** – Incident reporting is only the first step toward the development of a safe working environment. All incidents occurring in ECDC operations should be examined for Root Causes and Corrective Actions using the tools provided for incident investigation, to the level required by this procedure. Incident reporting can be considered complete only after all required investigations, and the implementation of all corrective actions, have been concluded and properly reported.  Incident Reporting – Schedule The following schedule shall be followed for the reporting of all incidents. Please refer to the defining the Incident Classification. You may also refer to the **Incident Reporting Instructions Flowchart see as Appendix1**   1. **Class I & Class V** 2. Immediately notify ECDC HSE Manager or ECDC General Manager. 3. Immediately notify Client. 4. Immediately notify Headquarters of ECDC. 5. Submit brief notice form to ECDC within 30 minutes of the incident. 6. Submit primary report form to Client and ECDC via email within 12 hours of the incident. 7. Submit further report form to Client and ECDC via email within 24 hours of the incident. 8. **Class II** 9. Immediately notify ECDC HSE Manager or ECDC General Manager. 10. Immediately notify Client. 11. Submit primary report form to Client and ECDC via email within 12 hours of the incident. 12. Submit further report form to Client andECDC via email within 24 hours of the incident. 13. **Class III** 14. Notify ECDC HSE Manager within 30 minutes of the incident. 15. Immediately notify Client. 16. Submit primary report form to Client and ECDC via email within 12 hours of the incident. 17. Submit further report form to Client andECDC via email within 24 hours of the incident. 18. **Class IV** 19. Notify ECDC HSE Manager within 30 minutes of the Incident. 20. Immediately notify Client’s DSV. 21. Submit primary report form to Client and ECDC via email within 12 hours of the incident. 22. Submit further report form to Client and ECDC via email within 24 hours of the incident.  INCIDENT INVESTIGATION AND REVIEW    Incident Investigation Policy and Procedure ECDC policy regarding incident investigation is to investigate all incidents with the correct level of attention.  The Line Manager shall, in conjunction with the rig HSE supervisor, complete Primary Report of Incident in accordance with the requirements of Section 5.0 of this procedure.  If needed, the team shall be formed with competent ECDC team members with knowledge in the area of the investigation. If a team is formed, one person shall be elected team leader. The leader is not based upon who has the most knowledge of the investigation, but who has the best overall ability to lead the team. Preferably the leader has undergone some type of auditing/incident investigation training (such as TapRooT Lead Investigator Course).  Once the correct level of investigation, coordination, and direction has been determined, the investigation should proceed with the following goals:   1. To identify the root causes of incidents so that actions can be taken to prevent recurrence 2. To establish the facts surrounding the incident for use in relation to potential insurance claims or litigation/civil suit 3. To meet relevant statutory, client or ECDC requirements on injury and incident reporting 4. The incident investigation process is comprised of the following consecutive stages: 5. Notification 6. Appointment of investigators 7. Preparation 8. Fact-finding 9. Analysis of investigation findings 10. Recommendations 11. Investigation report 12. Management endorsement 13. Implementation of recommendations 14. Distribution of investigation findings 15. Generation of HSE Alert 16. Entering any outstanding corrective actions in to the Rig/facility PCAR 17. Follow-up 18. A certain amount of overlap may be experienced in these stages. 19. The investigation report shall be formed after finished the investigation. The investigation shall including the following contents: 20. Incident Details 21. Description of incident 22. Investigation findings: Personnel, Equipment, Tools, Procedure, Environment 23. Other findings 24. Immediately causes 25. Underlying causes 26. Latent (Management) Failures 27. Recommendations  BSA-ECDC-HS-CL-O006-02-Incident Investigation Report template v1.0Monthly Incident Review A monthly Incident Review meeting will be held at ECDC office or base to review all incidents that have occurred within the previous month (or since the last meeting was held).  The meeting will be, at a minimum, comprised of HSE Department members and representatives of Senior Management. Other department heads will be invited to attend on an “as-needed” basis. Visiting Area Staff will be invited when present.  All incident reports will be reviewed and action items will be assigned according to the findings of each review. Action items generated by the meeting shall include, but are not limited to, the following:   1. Good Catch Award candidates 2. Incidents to be presented at the Monthly Safety Results Review (MSRR) 3. Safety Bulletins to be issued 4. Initiate Investigations 5. Requests for clarification of incident descriptions, photos, or any other additional information 6. Forward incidents to other departments (Engineering, Maintenance, etc.) for evaluation and comments  INCIDENT STATISTICS AND ANALYSIS    ECDC Incident Statistics ECDC HSE Manager is responsible for calculating the safety statistics on a monthly basis. The statistics shall be calculated using the standardized formulas detailed as follows:  The “Lost Time Injury Incident Frequency” (LTIF) identifies the number of lost time incidents which occurred based on the man-hours worked and is calculated as follows:   |  |  | | --- | --- | | Lost Time Injuries Frequency (**LTIF**) = | No. LTI x 1,000,000 | | Total Man hours (TMH) |   The "Total Recordable Injury Incident Rate" (TRIR) identifies the total number of recordable incidents which occur in every 1,000,000 man-hours worked and is calculated as follows:   |  |  | | --- | --- | | Total Recordable Case Frequency (TRCF) = | No. (LTI + MTC + RWC) x 1,000,000 | | Total Man hours (TMH) |  INCIDENT RECORD KEEPING Keep incident reports & associated forms, documentation, investigations, analysis on file at the HSE department.  9.1BSA-ECDC-HS-CL-O006-01-Initial Incident Notification Form V 1.0  9.2BSA-ECDC-HS-CL-O006-02-Incident Investigation Report template v1.0  9.3BSA-ECDC-HS-CL-O006-03-Monthly Safety Initiative and Incident Review templatev1.0  9.4BSA-ECDC-HS-CL-O006-04-Project Incident C.A.R. v1.0 |  |

# Appendix 1 - INCIDENT REPORTING INSTRUCTIONS FLOWCHART

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