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In order to remain competitive, companies need to take calculated risks to maintain and increase market share. This can take many forms including but certainly not limited to:

- Deploying new, unproven technologies, which could give them a competitive advantage but could also prove to be a costly mistake if they don't work as planned
- Working in hazardous places such as new oil fields or deeper mines
- Entering new geographies or industry sectors

If they work out as anticipated, each of these business initiatives can prove beneficial and profitable for a company willing to pursue them. However, exposing the organization to greater risk increases the likelihood of incidents occurring. These incidents could include:

- Employee injuries, illnesses or fatalities due to workplace hazards not being taken into consideration
- Damage to the environment due to the release of pollutants into waterways or the atmosphere
- Damage to equipment due to improper use

As a result of these incidents, companies could face:

- Employees being unable to work for an extended period of time due to injury and illness resulting in others needing to be trained to cover for them and the possible hiring of temporary workers
- Compensation claims from employees and local citizens suffering injuries, illnesses, permanent disability and loss of income
- Fines from authorities as a result of regulation breaches
- Significant costs to clean up environmental damage
- Extensive legal cases brought by authorities and members of the local community
- A workforce suffering from low morale as a result of health and safety issues
- Financial loss due to the interruption of standard operation caused by damaged equipment
- Loss of reputation and damage to their brand

To avoid significant negative impact to the company, EHS professionals have to be prepared to manage major incidents as quickly and efficiently as possible before they escalate and have significant consequences. Ideally, companies should try to prevent accidents from occurring in the first place by analyzing and mitigating potential risks ahead of time.

This guide provides you as an EHS Professional with a set of best practices to help you implement effective incident management within your organization so you can reduce their impact and prevent them in future. This is achieved by analysing near misses, employee behavior and potential hazards.





Incidents, Near Misses and Incident Management

Before we discuss incident management best practices, it is important to define incidents and near misses as different organizations have different definitions.

INCIDENTS

An incident can be described as any event that results in an interruption to your company's operations. Usually, these incidents involve the health and safety of employees and others. In this guide, we will also use it to describe damage to the environment, company buildings and equipment.

As discussed in the introduction incidents need to be managed and resolved as quickly as possible in order to limit the impact they have on your business.

NEAR MISSES

Near misses are events or observations that could result in the types of incidents described above that have not yet transpired into any significant loss. It is important to note that, unlike incidents, near misses do not have to be actual events that take place. They could simply be an observation of a potentially dangerous situation.

In most organizations, near misses are not brought to management's attention in the same way as incidents because they are not viewed as serious enough. However, as we will discuss later, in order to establish a strong safety culture, it is vitally important that near misses are recorded and analyzed as they often provide critical information that can help prevent serious incidents in the future.

INCIDENT MANAGEMENT

Incident management is the process of recording, managing, investigating, analyzing and reporting on events that have caused an interruption to your company's business operations. The main goals of incident management are to:

- Manage a current incident as quickly and efficiently as possible to limit any losses it may cause
- Learn from incidents and near misses in order to reduce the chance of accidents in the future





While it is important to manage incidents to limit their consequences, to create a safer working environment you should implement best practices that go further than just dealing with them once they occur. To create this type of positive safety culture, you need to encourage all employees to monitor their workplace for hazards and report any near misses so that you can use this information to predict and prevent future incidents.

This section describes five best practices to help you manage incidents and to actively create a positive safety culture in your company. This will lead to a safer working environment.

#1 CREATE A POSITIVE SAFETY CULTURE

Preventing incidents from occurring requires a positive safety culture across your entire company. This involves everyone not only being aware of aspects of health and safety but also actively participating to ensure that the working environment remains safe.

Statistics show that a significant number of incidents are caused by poor behaviors, which, if eliminated, would significantly improve the safety of the workplace. The culture change needs to be proactively driven from senior management and should not only include ensuring that equipment, systems and procedures are safe but also encouraging behaviors that promote a safe working environment.

Changing the culture of any organization is difficult and time-consuming. To encourage a positive safety culture, you should start with behavioral safety approaches. This involves having defined rules and regulations for employees to follow. Once they start acting safely due to rules and regulations being in place, this behavior becomes the norm for everyone resulting in a positive change in culture.

As this positive safety culture is established in your company, you will see the following positive elements¹:

- Effective control of hazards due to working practices and rules
- Positive attitudes to risk and compliance management
- A culture of learning from incidents and near miss reports in order to continually reduce the risk of accidents

As we will discuss later, learning from past mistakes is the best way to improve safety and therefore a blame-free environment where employees feel they can report safety breaches is critical to ensure continuous improvement.

¹Pidgeon N F. Safety culture and risk management in organizations. Journal of Cross-cultural Psychology, 1991



REMEMBER: changing a company's safety culture cannot happen overnight and should be introduced slowly to avoid resistance from employees.





#2 MAKE THE MOST OF NEAR MISSES

Many studies have shown that serious accidents can often be avoided if potential hazards are identified and rectified early. In order to do this, you need to be aware of these near misses, and promote the reporting of them. This can be a much bigger challenge that it first appears to be.

COLLECTING NEAR MISS INFORMATION

To understand why collecting near miss reports can be difficult to achieve, put yourself in the shoes of an employee who sees a potential hazard or experiences a minor accident that doesn't cause loss of any kind. Now ask yourself the following questions:

- Is what I have witnessed actually considered a near miss?
- Could my management accuse me of not doing my job and causing the near miss?
- Are the actions or inactions of my colleagues responsible for the near miss? If so, will I be accused of betraying them if I report it?

These types of anxieties will clearly discourage employees from submitting a near miss report. Not having this information will make it very difficult for you to predict future incidents. So, how can you encourage employees to be more open and report more near misses? The table on page 12 compares the two most common options – incentives and education.

While an education program will significantly help employees understand your company's definition of near misses and why they should report them, it will not address the types of anxieties listed above. To do this, you should consider giving employees the option to report near misses anonymously. While anonymous reporting prevents additional details about the near miss from being obtained by the investigator, it increases the likelihood of potential hazards being reported rather than being ignored.



	INCENTIVES	EDUCATION
DESCRIPTION	Reward with incentives such as safety bonuses or gifts (e.g. tablet PCs, shopping vouchers, additional days leave) for employees that submit a certain number of near miss reports within a given time period	Educate employees on the importance of a positive safety culture and how they can contribute through the reporting of near misses. Regularly communicate safety improvements as a result of employee actions
POSITIVES	Easy to raise awareness across all employees and easy to measure	Will result in a positive safety culture over time as employees gain an understanding of the benefits of near miss reporting, etc. Able to allow employees to optionally report anonymously
NEGATIVES	 Employees will be tempted to submit sub-standard reports to meet reward conditions Unlikely to lead to a genuine workplace improvement as employees are focused on reward rather than safety culture Over a period of time, incentives can become stale resulting in a lack of interest from employees Unable to allow employees to report anonymously 	 Additional resources required to provide on-going training Change of organizational culture takes time and will not yield instant results
RECOMMENDATIONS	Safety improvement incentive programs should not be used in isolation as they encourage the wrong type of behavior and prove ineffective in the long-term	Start an education program as soon as possible as this will ultimately result in a solid positive safety culture over time and will significantly reduce the number of major incidents



As a result of implementing an anonymous near miss reporting system, you may receive irrelevant or even unprofessional reports as employees feel they can hide. If you experience these types of reports, you should change your education program so employees gain a greater appreciation of the safety culture process.

In addition to anonymous reporting, you may want to consider a policy encouraging disclosure while ruling against disciplinary action providing a cardinal rule has not been broken and there has been no actual loss or damage. Doing this means that you will increase the likelihood of receiving near miss reports and will also get the employee's name so you can collect additional information if required.

USING NEAR MISS INFORMATION TO PREVENT FUTURE INCIDENTS

To determine where your next major incidents may occur, you need to analyze the information available from near miss and actual incident reports to establish their root-cause so preventative measures can be implemented.

WARNING:

Your goal should be to **increase**the number of near miss reports
as they will help you **decrease**the number of actual incidents.
There have been cases where
actions of management in some companies
reduced the number of near miss reports resulting
in an increase of serious incidents!



Checklist: Near Miss Recommendations

- Do all of your employees know how to identify and report a near miss?
- Do your employees understand the importance of reporting near misses and do they feel comfortable in doing so?
- Are you constantly and consistently providing training to keep your employees aware of safety procedures and their roles in incident management?
- Are you making the most of the information available in near miss reports to predict and prevent incidents?

To make the most of the information available in near miss and actual incident reports, you should:

- **1.** Ensure that near misses are analyzed on a regular basis so that lessons can be learned quickly and any clarifications can be sought before vital information is lost.
- 2. Use subject matter experts who have sufficient relevant experience to understand the implications of the information, perform the analysis and make the necessary recommendations.
- 3. Pass information to the subject matter experts quickly so that they can collect vital information and interview potential witnesses while the information is fresh in their minds. This will help them ensure they have all of the relevant data to perform root cause analysis and will lead to the faster identification of a resolution. This in turn will decrease the likelihood of a similar incident reoccurring.
- 4. Identify the root cause of the near miss. Depending on the potential severity and complexity of the near miss, identifying its root cause could either be an informal process involving two people or could follow a more advanced analysis procedure comprising a specialist team. The investigation should focus on why controls failed with the intention of providing recommended corrective action to prevent a reoccurrence.



REMEMBER: a near miss should be treated as an opportunity to improve overall safety to prevent a serious incident and not as evidence to support a blame culture.



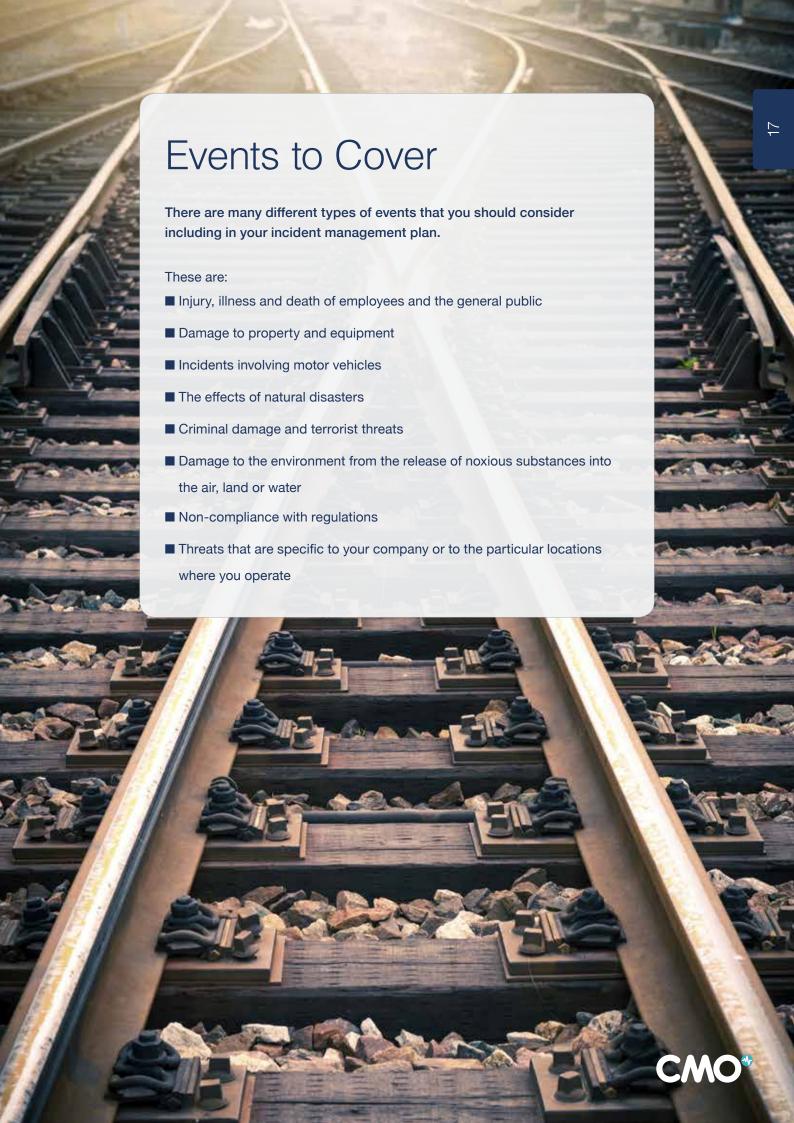
- 5. Identify solutions based on the root causes. Depending on the circumstances, it may not be possible to completely remove the hazard. If this is the case, it may be possible to reduce the hazard level or at least make employees more aware of it. You should try to ensure that the proposed solution does not have any unintended consequences that adversely affect the safety of related systems or processes causing new hazards to be introduced.
- **6.** Communicate the findings and potential solutions to all appropriate parties company-wide as soon as it is practically possible. Failure to provide findings to all concerned could result in major preventable incidents occurring unnecessarily. This information should include as a minimum:
 - The hazard or safety condition identified
 - Follow-up information such as short-term recommendations on how to prevent the identified hazards or safety conditions from becoming major incidents
 - A description of how long-term preventative measures will be integrated into systems and processes

#3: CREATE YOUR INCIDENT MANAGEMENT PLAN

Although your goal as an EHS Professional is to put controls in place to prevent all incidents, unanticipated emergencies will occur. You need to maintain a high degree of readiness to be able to deal with these unforeseen incidents so that their impact on employees, the wider community, buildings, equipment and the environment is minimized.



In order to improve the safety of your working environment, you must learn from previous accidents and near misses and implement controls to prevent them from reoccurring.



While it is practically impossible to plan for every eventuality, you should at least try to be prepared. To do this, you need to perform risk assessments of critical business operations to determine the places and types of emergencies that could arise. With this information, you can put plans in place and train employees to respond to them.

In addition to creating the plans and training employees, it is important to put them to the test on a regular basis by conducting drills and simulations. These tests will determine whether the plans are comprehensive enough to deal with the incidents and will highlight any weaknesses such as training deficiencies that need to be addressed.

CONTENTS OF YOUR INCIDENT MANAGEMENT PLAN

The contents of your incident management plan will vary depending on your business operations, the types of risks your company is exposed to, and the geographies you operate in. However, your incident management plan should contain the following as a minimum:

- Background why the plan exists
- Scope and purpose what the plan covers and does not cover. This should include and exclude different divisions of the business, different geographies and particular risks and hazards. For example, if the incident management plan only covers the risks associated with health and safety then this should be made clear so that there is no assumption that it covers other areas such as financial risk

■ Incident Response Structure

- Details of response procedures
- Responsibilities when dealing with the incident
- Location of equipment required to deal with incidents
- Location of employees responsible for managing the incident
- Procedures to evacuate employees and deal with casualties
- Debriefs and reporting

Checklist: Incident Management Policy

- Have you considered all of the key types of situations that could result in an emergency?
- Do you have scheduled drills and simulation exercises to test your plans to identify improvements?
- Have you got a "catch-all" procedure to deal with unanticipated incidents that you cannot specifically plan for?



■ Communication responsibilities

- Who needs to be informed?
- When they need to be informed? For example, are there key responders who should be kept up-to-date as the incident unfolds or regulators who need to be informed within a given time period?
- Who is responsible for communication to the different parties?

■ Schedule of activities

- Date for the annual update of the incident response plan
- Dates for reviews of known changes to the business, premises,
 equipment, processes or regulations that could require changes to plan
- Dates of drills and simulation exercises to regularly test the plan
- Dates for regular update training for employees

Finally, when creating your incident management plan you should constantly be aware that it is impossible to anticipate and plan for every eventuality. Therefore, your plan should include a "catch-all" category of incidents that fall outside of the planned incident responses but are still within its scope. This part of the plan should, for example, include generic forms to capture information and assign a person or group who will be responsible for real-time decision making to manage the incident quickly and effectively.

#4: KEEP YOUR INCIDENT MANAGEMENT PLAN CURRENT

It is likely that your organization already has an incident management plan. Hopefully it was drawn up to cover a wide variety of anticipated situations but has anybody within your organization examined it recently to see if it still reflects your current business operations? As the owner of the plan, are you sure that it will be effective in the event of an incident?

If your company's incident management plan was drawn up a long time ago or if you have taken over responsibility for it from somebody else, you should conduct a review to verify that everything in it still matches your organization's business requirements. You do not want to find out that it is out of date when you implement it for the first time.

Therefore, it is important that you regularly review the incident management plan to ensure that it is aligned with any company changes.

When conducting the review of your current incident management plan, you should:

- 1. Assess recent reports concerning incidents, near misses and potential hazards. If they exist and are accessible, any reports submitted by employees since the last incident management plan update will form a critical part of the your new plan. They reflect the most current state of risks and hazards in your organization. If this information is not available, then you will have to rely on conducting scenario-planning exercises with the help of different departments to identify the types of incidents that could occur and are difficult to prevent upfront.
- **2. Assess recent business changes** that could affect your incident management plan. To bring your incident management plan up to date to match business changes you should consider the following questions:
 - Are there new areas of the business that need to be considered? For example, are you now manufacturing different products, mining for different minerals or doing new types of construction?
 - Have you recently opened new facilities that are not covered by your current plan?
 - Are the procedures and supporting systems that are in place still adequate enough to support any new requirements?
 - Are all of the personnel responsible for parts of the plan still working for the company and are they in the same roles? Are they still aware of their responsibilities?

As well as extending your incident management plan to cover these new areas, you should remove any parts that are no longer relevant. This could include sites that have closed down, operations that are no longer performed by your company including those that have been outsourced to third parties, and employees that no longer work for the company.

Overall, this part of the clean up exercise will ensure that the scope of your incident management plan is accurate based on your current business



environment and does not contain any superfluous text that unnecessarily increases the size of the document without adding any value.

- **3.** Ensure that **employees are adequately trained and equipped.** As well as naming individuals responsible for elements of the incident management plan, you need to ensure that they have all of the necessary skills and, where applicable, equipment to perform their roles. Training should be continually updated to ensure that employees are kept up-to-date with the latest emergency response methodologies.
- 4. Communicate changes to ALL relevant parties. It is important to communicate any changes to your incident management plan to everyone it affects. This may include external third parties as well as internal employees. Your communications plan should not just include those with specific responsibilities in the incident plan but be extended to all employees so they know how and when to report major incidents and near misses.
- 5. Schedule the next incident management plan update session. It is best practice to schedule regular update sessions so that your incident management plan remains in step with your company's requirements. It is recommended that you go through a full update check at least once a year with ad hoc updates being made when major changes such as new factories or lines of business are brought online.

#5 MANAGE INCIDENTS QUICKLY AND EFFECTIVELY

As discussed above, in an ideal world, you would be able to prevent all incidents from happening. However, unpredictable incidents do occur because of continuing hazards that cannot be completely avoided, human fallibility or chance circumstances that cannot be avoided. When they do occur, it is necessary for your company to manage them quickly and effectively so that they cause as little damage as possible to the company, employees, the community, equipment and buildings, and the environment.

The five key areas that you need to consider to ensure that incidents are managed quickly are:

1. Assess and respond to immediate requirements

Quickly determine the severity of the incident to identify who is immediately affected and who could be affected in the short term. Implement and deal with immediate safety requirements in line with response procedures set out in your incident management plan. This will include informing relevant people named in the plan who are either first responders to the type of incident you are facing or will manage the overall response and communications.

2. Record evidence

Once the immediate danger of the incident has been dealt with, you should establish and record all of the facts and gather as much evidence as possible to assist the investigation team. You should remember to gather the facts and evidence from the wide variety of sources available including witness statements, site observations, and measurements from the site such as the extent of any damage or pollution levels. Where possible, standardized electronic forms and procedures from the incident management plan should be used as they will be widely understood by everybody and will ensure that no vital evidence is missed.

3. Analyze evidence and determine root causes

Depending on the severity and nature of the incident, the investigation to determine the root cause could involve a large team of specialists and could take a considerable amount of time to complete.

4. Identify and implement controls to prevent reoccurrence

As discussed for near misses above, it may not be possible to completely remove the hazard. In these circumstances it should be possible to reduce the hazard level or at least make employees more aware of it.

5. Report the incident and investigation findings

You need to quickly determine who should be informed once the nature of an incident is known. Your incident management plan should indicate the internal and external parties that need to be made aware of the incident. This is particularly important if there are regulations governing the time limit to report specific health and safe issues to government authorities.



Checklist: Managing Incidents Efficiently

- Is your Incident Management plan up-to-date and available to all relevant parties?
- Do all employees have access to standardized forms to record facts and evidence about the incident?
- Do you have adequate systems and processes in place to facilitate real-time collaboration and communication when dealing with incidents?

6. Manage on-going requirements

Once the initial requirements of the incident have been dealt with, there will usually be follow-up actions that you have to go through before the incident is fully resolved. Depending on the nature of the incident this follow-up could include:

- Managing claims from injured workers
- Managing compensation claims
- Injury management
- Investigation and action tracking
- Managing the return-to-work process for an employee which consists of HR procedures, safety discussions, medical checks and compensation claims

Collaboration and communication are critical for all steps of the incident management process. You should ensure that you have adequate systems and processes in place that are accessible to everyone involved in the incident management process. This could include tablet or smart phone mobile systems to allow collaboration and communication between the operators in the field and coordinators based in a centralized location.

CONCLUSION

While all companies have to take risks in order to remain competitive, those with a mature approach to Environmental, Health and Safety Management ensure that they have policies, procedures and systems in place to help them predict and prevent major incidents from occurring and to help them manage and minimize the impact of unforeseen incidents that do occur.

This set of best practice guidelines has set out strategies to help you implement a positive safety culture, to create an incident management plan and to make the most of existing information within your company. Implementing these strategies will help you create a safer, better-regulated working environment.





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