

1.1 PURPOSE

- 1.1.1 The purpose of this policy is to establish TERRY R PITT CONSTRUCTION's procedures for incident reporting and investigation. While all incidents will be investigated, the extent of such investigation will reflect the seriousness of the incident utilizing a root cause analysis process or other similar method.

1.2 RESPONSIBILITIES

1.2.1 Management

- 1.2.1.1 Dispatch personnel to meet and/or accompany injured party to medical facility. Representative stays with injured employee and reports condition of injured employee back to management.
- 1.2.1.2 Prepare *Employer's First Report of Injury* and submit it to appropriate state and/or federal agencies.
- 1.2.1.3 Complete all applicable forms and distribute to appropriate authorities. Follow up with employee and medical personnel until the employee is released for full duty. Use *Supplemental Report of Injury* to report changes in employee work status.
- 1.2.1.4 Notify immediate family of injured worker (if appropriate).
- 1.2.1.5 Contact and update appropriate customer personnel on condition of injured employee.
- 1.2.1.6 Review incident report findings and ensure recommendations are communicated to all employees and/or client employees incorporated into TERRY R PITT CONSTRUCTION's safety program.

1.3 GENERAL

- 1.3.1 Reporting and investigation of all incidents, both with and without injury, or property damage and near misses, will lead to identification of root causes, uncover contributing accident causes, and help to:
- 1.3.1.1 Reduce economic losses from injuries and lost production time.
- 1.3.1.2 Help employees develop an awareness of workplace problems and hazards.
- 1.3.1.3 Identify areas for process improvement to increase safety and productivity.
- 1.3.1.4 Note areas where training information or methods need improvement.

Incident Reporting and Investigation

- 1.3.2 TERRY R PITT CONSTRUCTION will comply with OSHA requirements of reporting work related incidents. Work related injuries or illnesses that result in hospitalization, amputation, or the loss of an eye will be reported to OSHA within 24 hours of the incident. Incidents resulting in a fatality must be reported to OSHA within 8 hours. It is required that all incidents be reported to customers as soon as possible but no later than 24 hours.
- 1.3.3 Emergency phone numbers will be determined prior to performing work. Responsibilities for reporting and investigating will be established and assigned to individuals prior to incidents.
- 1.3.4 Following rescue, actions to prevent further loss must be taken. Maintenance personnel should assess integrity of buildings and equipment. Engineers may evaluate the need for bracing of structures. Specialized personnel may be mobilized to control and contain hazardous materials.
- 1.3.5 Management will complete an incident report and file for future reference. When applicable, notify a claims adjuster and make a copy of the incident report available.
- 1.3.6 TERRY R PITT CONSTRUCTION will examine the importance of all near miss incidents. Supervisors will emphasize the importance of reporting near misses, as minor as they may seem. Near miss incidents must be documented and reports and investigations must be turned in for review.

1.4 REPORTING

- 1.4.1 All incidents including, but not limited to: equipment damage, process failures, near misses, environmental spills, occupational injuries, illnesses and fatalities, or security issues will be reported immediately according to TERRY R PITT CONSTRUCTION's policy. Failure to report an incident, injury, or illness may result in disciplinary action against the employee and/or onsite supervisory personnel, up to and including termination of employment.
- 1.4.2 TERRY R PITT CONSTRUCTION will verbally report required incidents to OSHA within 8 hours of discovery. Incidents will also be reported to TERRY R PITT CONSTRUCTION's customer as soon as possible or in a timely manner (within 24 hours of incident).
- 1.4.3 Incidents will be reported in the following order:
 - 1.4.3.1 Emergency services, 9-1-1, or other appropriate medical providers must be alerted
 - 1.4.3.2 Supervisor
 - 1.4.3.3 Supervisor will contact management
 - 1.4.3.4 Management will contact safety manager or other management personnel to meet or accompany the injured party to the medical facility
 - 1.4.3.5 A member of management will notify appropriate authorities (ex. OSHA, EPA)

- 1.4.3.6 All incidents regardless of severity will be reported to the customer (where applicable)
- 1.4.4 Per incident investigation procedures, all personnel must be prepared to provide a clear description of the injury or illness. Written statements may also be required.
- 1.4.5 Failure to immediately report injuries or illnesses will result in progressive disciplinary actions. No medical treatment will be authorized for any job-related injury or illness that was not reported in the prescribed manner except in the case of an emergency.

1.5 MEDICAL ATTENTION

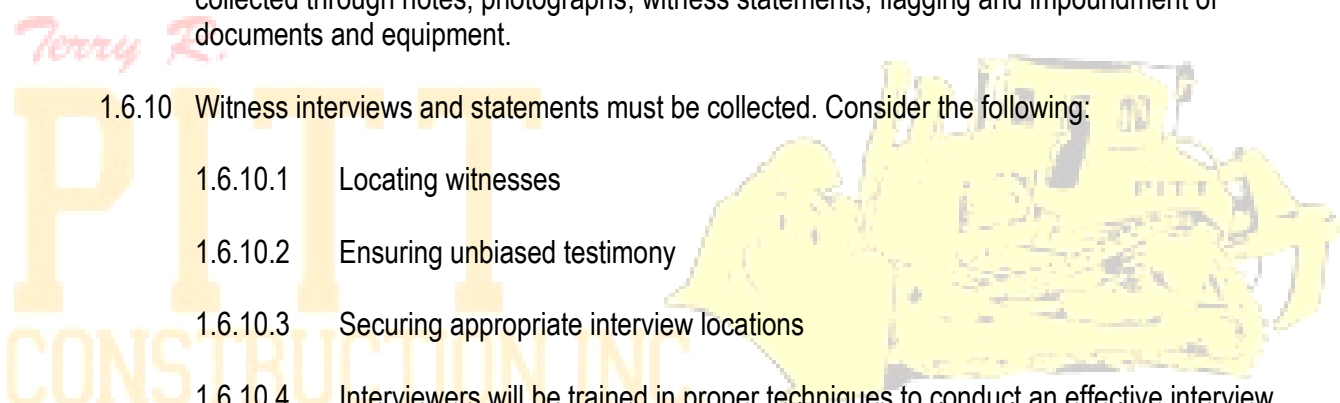
- 1.5.1 First notification of injury or illness must be made to the direct supervisor prior to reporting to the clinic/hospital. Serious cases should be reported directly to the clinic/hospital.
- 1.5.2 TERRY R PITT CONSTRUCTION reserves the right to require personnel seeking medical attention for a work-related incident to be examined by a company physician.
 - 1.5.2.1 At least one trained and qualified first aid/CPR provider will be onsite to provide first response to control the degree of loss during the immediate post-incident phase.
- 1.5.3 Adequate first aid supplies and equipment are maintained on each jobsite for emergency use.
- 1.5.4 TERRY R PITT CONSTRUCTION will ensure that workers receive first aid treatment and should the injury require it, transportation, so that professional medical care can be given.
- 1.5.5 Employees receiving medical attention for a work-related incident will be required to submit to a drug screen test conducted by TERRY R PITT CONSTRUCTION.
- 1.5.6 Injury assessment and treatment of the injured is the first priority in incident response. During injury assessment, transportation arrangements should also be made. After notifying the appropriate TERRY R PITT CONSTRUCTION manager of the incident and logistics arrangements, TERRY R PITT CONSTRUCTION supervisory personnel or a designated person will escort and accompany the injured person(s) to the medical treatment facility and remain with the injured employee until:
 - 1.5.6.1 Employee has been treated and released (at which time the employee will be escorted to the TERRY R PITT CONSTRUCTION operations facility).
 - 1.5.6.2 The employee has been admitted.
 - 1.5.6.3 A TERRY R PITT CONSTRUCTION representative relieves the escort.
 - 1.5.6.4 A family member or friend has arrived to pick up the employee.
- 1.5.7 TERRY R PITT CONSTRUCTION hereby extends restricted and/or light duty to those employees released by a physician for their type of work (when applicable).

- 1.5.8 Employee medical records will be filed by social security number and kept separately from all other files. Either employees or their designated representatives may request copies of these files.

1.6 INCIDENT INVESTIGATION

- 1.6.1 The goal of the incident investigation is the prevention of future accidents by using knowledge derived from the investigation. Incident investigations must result in corrective actions. The investigation will be used to prepare reports required by federal and state laws as well as workers' compensation carriers.
- 1.6.2 All incidents will be appropriately investigated in a timely manner. All incidents will be investigated per the company's incident reporting and investigation procedures. Incident investigations will take place as soon as practicable after the incident occurs. While all incidents will be investigated, the extent of the investigation will reflect the seriousness of the incident.
- 1.6.3 Investigations will be conducted by qualified personnel such as the project manager and/or supervisors once the company is notified of an incident. Management may participate in the investigation and preparation of the final report. All investigations will be dedicated solely to fact finding. All individuals will be identified for the role they played in the events leading up to the incident. Information gathered will be accurate, factual, complete, and unbiased.
- 1.6.4 To ensure a proper and accurate investigation, certain equipment will be made available and may include some or all of the following items: writing equipment, such as pens and paper, measurement equipment, such as tape measures and rulers, cameras, small tools, audio recorder, PPE, and marking devices, such as flags, equipment manuals, etc.
- 1.6.5 All work activities in the area where the incident occurred will be suspended until the incident has been reviewed with all affected personnel, appropriate corrective actions have been identified and implemented, and the site has been determined to be safe for the resumption of work. Incident sites will be preserved until an appropriate investigation is completed.
- 1.6.6 The supervisor will secure or assist in securing the scene of the accident to prevent further injury to personnel, aid injured employee(s), and coordinate efforts to obtain proper medical assistance.
- 1.6.7 The supervisor will report to customer personnel on location and/or immediately notify management. The following information, if available, will be made available at time of first report of injury:
 - 1.6.7.1 Name of injured party
 - 1.6.7.2 Names of all TERRY R PITT CONSTRUCTION personnel on location
 - 1.6.7.3 Date, time, and specific location of incident
 - 1.6.7.4 How the incident occurred

- 1.6.7.5 Description of injury
- 1.6.7.6 Names and statements of witnesses and their employer(s)
- 1.6.7.7 Estimated time of arrival, name, and location of clinic where victim will be transported
- 1.6.7.8 A written statement detailing conditions and events surrounding the incident
- 1.6.7.9 Pictures of accident scene
- 1.6.8 Initial identification of evidence immediately following the incident should include a listing of people, equipment and materials involved, and a recording of environmental factors such as weather conditions, illumination, temperature, noise, ventilation, etc. Evidence such as witness statements and interviews will also be required to be collected as evidence.
- 1.6.9 Evidence such as people, equipment position, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging and impoundment of documents and equipment.
- 1.6.10 Witness interviews and statements must be collected. Consider the following:
 - 1.6.10.1 Locating witnesses
 - 1.6.10.2 Ensuring unbiased testimony
 - 1.6.10.3 Securing appropriate interview locations
 - 1.6.10.4 Interviewers will be trained in proper techniques to conduct an effective interview
 - 1.6.10.5 Follow-up interviews will be provided, as required
- 1.6.11 All investigations will be documented, to include the following elements:
 - 1.6.11.1 Drawings, sketches, points of reference, and/or measurements
 - 1.6.11.2 Photographs of worksite and/or relevant elements of the incident
 - 1.6.11.3 Witness information and written statements
 - 1.6.11.4 Root cause, contributing factors, corrective action/measures
- 1.6.12 Make recommendations for corrective action:
 - 1.6.12.1 Responsibilities must be assigned (investigators, management, technical personnel) for completion of the action plan.



- 1.6.12.2 Record in the investigation report.
- 1.6.12.3 Recommendations will focus on the corrective action to contributing factors identified.
- 1.6.12.4 Recommendations will specify what, why, and how corrective actions are completed.
- 1.6.13 Ensure recommendations are acted upon:
 - 1.6.13.1 Assign responsibility for the follow-up of the corrective action(s).
 - 1.6.13.2 Record on action plan section of the investigation report.
 - 1.6.13.3 Detail what has been done, who completed the actions, and when completed.
 - 1.6.13.4 Ensure the recommendations are communicated to employees and implemented to prevent reoccurrence of similar events.
- 1.6.14 Written incident reports are documented on the *Employer's Report of Injury* form and will include a statement of events. The report will include, at a minimum, the description of the incident, evidence collected, an explanation as to the cause of the incident, and corresponding corrective actions. Photographs, witness statements, drawings, etc. should be included.

1.7 VEHICLE INCIDENTS

- 1.7.1 All vehicle incidents that occur while an employee is operating a vehicle owned, leased, or rented by TERRY R PITT CONSTRUCTION must be immediately reported to management. This includes incidents or personal injury involving real or claimed damages/injuries to non-owned TERRY R PITT CONSTRUCTION property or third-party personnel.
- 1.7.2 If injuries, real or claimed, are involved, obtain information regarding the extent of injuries. Assistance will be rendered to anyone who might have sustained injuries.
- 1.7.3 Obtain an accurate description of the location.
- 1.7.4 Notify the local or appropriate law enforcement authorities and TERRY R PITT CONSTRUCTION's office as soon as practical. Unless causing a traffic hazard, the vehicle should not be moved until instructed to do so by the investigating law enforcement officer. Position the available hazard devices to warn oncoming motorists.
- 1.7.5 TERRY R PITT CONSTRUCTION employees should not make any statements except as required by the investigating officer or company personnel. Obtain name of investigating officer, agency employing the investigating officer, and ask for copies of any state or local forms to be filled out.

Incident Reporting and Investigation

- 1.7.6 Identify the people (names, addresses, telephone numbers, and driver's license numbers) and vehicles (make, model, license numbers) involved. Identify and obtain names, addresses, and telephone numbers of all passengers and witnesses.
- 1.7.7 Management will ascertain, to the extent possible, location, injuries to TERRY R PITT CONSTRUCTION and/or third-party personnel, and property damage to TERRY R PITT CONSTRUCTION or third-party property. Do not attempt to settle an accident, admit fault, or responsibility.
 - 1.7.7.1 Notify nearest claims adjuster and request adjuster's presence at the incident scene. If necessary, also dispatch management representative to the scene of the incident.
- 1.7.8 Any non-vehicular incident where there is damage to non-owned property or personal injury to persons other than TERRY R PITT CONSTRUCTION employees, but resulting from TERRY R PITT CONSTRUCTION employee conduct, operation of TERRY R PITT CONSTRUCTION equipment, or use of TERRY R PITT CONSTRUCTION products or procedures must be reported as a potential general liability claim.
 - 1.7.8.1 TERRY R PITT CONSTRUCTION employees should render location as safe as possible. This includes securing TERRY R PITT CONSTRUCTION equipment and offering first aid assistance.
 - 1.7.8.2 After the emergency has subsided or work has been completed, but before leaving the location, obtain all pertinent information regarding the incident and/or occurrence.
 - 1.7.8.3 Obtain names, addresses, and employers of all personnel and witnesses present when the accident occurred.
 - 1.7.8.4 Extent of injury.
 - 1.7.8.5 Location of the accident.
 - 1.7.8.6 Extent of property damage.
- 1.7.9 If TERRY R PITT CONSTRUCTION equipment is involved, said equipment, as instructed by management, may be tagged and removed from service for further investigation. If equipment has been taken out of service, only an officer of TERRY R PITT CONSTRUCTION may release the equipment for field use.
- 1.7.10 The manager or designee is responsible for reporting all incidents and injuries (except first aid cases) to the claims administrator within two working days of the incident. This report can be made by telephone. Serious accidents must be reported to the claims administrator immediately.

1.8 NEAR MISS

- 1.8.1 A near miss is an unplanned event that did not result in injury, illness, or damage - but had the potential to do so. TERRY R PITT CONSTRUCTION encourages workers to report all near misses to their supervisor.
- 1.8.2 TERRY R PITT CONSTRUCTION will utilize near miss situations as training opportunities to prevent imminent incidents.
- 1.8.3 When an unfortunate near miss occurs, TERRY R PITT CONSTRUCTION will call a safety meeting to discuss what actually happened, what could have happened, and ways to ensure it does not happen again. TERRY R PITT CONSTRUCTION sees this as the perfect opportunity to conduct a training session on near misses in general and what employees should be looking out for in a particular environment. Opening up a discussion with the topic of safety at the center is a chance for employees and employers to share ideas, tips, and concerns. It is an advantage for TERRY R PITT CONSTRUCTION to develop a proactive, not reactive, safety program.
- 1.8.4 Warning signs of near misses will not be neglected or ignored. Employees and supervisors understanding what happened will reduce or control any future hazards.
- 1.8.5 Hazards will be removed as soon as possible, but they still should be reported so TERRY R PITT CONSTRUCTION can monitor the situation, even after the hazard has been removed. By discussing near misses and hazards, awareness can be raised for employees to look out for other hazards that should be reported to a supervisor.

1.9 INCIDENT REPORT

- 1.9.1 The following procedures will be followed when completing TERRY R PITT CONSTRUCTION incident reports. The same form is used when completing personal injury, illness, or vehicle incidents.
- 1.9.2 All questions, sections, or blanks must be completed. If the blank does not require information, insert N/A.
- 1.9.3 All reports should contain as much detail about the incident as possible. The narrative should include an introduction, methodology, summary of the incident, investigation team names, narrative of the event, and findings and recommendations.
- 1.9.4 Report the facts only; avoid any opinions. Include diagrams or pictures to help explain the incident.
- 1.9.5 It is the supervisor's responsibility (with the help of management) to complete TERRY R PITT CONSTRUCTION incident report and any other reports when appropriate.

1.10 ROOT CAUSE

- 1.10.1 The tendency of incident investigations has been to focus on the immediate actions and conditions of the incident. While it is important to evaluate immediate actions and conditions, the overall tone

of an incident investigation should be that health and safety matters to TERRY R PITT CONSTRUCTION.

- 1.10.2 Once all of the possible causes have been identified, each one should be examined until a root cause is identified. At this point, it is important not to focus on one particular suspected cause, because all factors that led up to the incident need to be examined and eventually corrected.
- 1.10.3 The examination process is actually a series of questions, because identifying the root causes to incidents will usually center on the *why* or *why not* to get closer to determining the root cause(s) of the incident. These questions may also help determine reasons for certain employee actions that led up to the incident.
- 1.10.4 When looking for root causes to an incident, determine why an employee acted the way they did prior to the incident, or look at the specific conditions of the task just prior to the incident.
- 1.10.5 Identify the failures at a deep level in order to prevent not only a reoccurrence of the incident, but all of the potential incidents stemming from the same root cause.
- 1.10.6 Deciding on a root cause is ultimately what the incident investigation process is about. There may be several causes of the incident and not just one.
 - 1.10.6.1 Look at the overall effect the incident had on people, property, and processes at the facility
 - 1.10.6.2 Examine all potential causes of the incident
 - 1.10.6.3 Determine the reasons behind the employee actions that led up to the incident
- 1.10.7 Utilize these three steps to determine a root cause or root causes of the incident. Use this information to develop the corrective and preventive actions that will help prevent future incidents. Lessons learned will be reviewed and communicated. After determining the root cause, corrective and preventive actions must be put in place that will eliminate, or at least reduce, the chances of another incident occurring.

1.11 FIVE WHYS

- 1.11.1 TERRY R PITT CONSTRUCTION will utilize the *Five Why* methodology. The *Five Whys* method is an iterative interrogative technique used to explore the cause-and-effect relationships underlying a particular problem. The primary goal of the technique is to determine the root cause of an incident by repeating the question *Why?* Each answer forms the basis of the next question.
- 1.11.2 The *five* in the name derives from an anecdotal observation on the number of iterations needed to resolve the problem. Not all problems have a single root cause. If one wishes to uncover multiple root causes, the method must be repeated asking a different sequence of questions each time.
- 1.11.3 The method provides no hard and fast rules about what lines of questions to explore, or how long to continue the search for additional root causes. Thus, even when the method is closely followed, the

outcome still depends upon the knowledge and persistence of the people involved.

- 1.11.4 One of the most important aspects in the five why approach is that the real root cause should point toward a process that is not working well or does not exist. The *Five Whys* method will help TERRY R PITT CONSTRUCTION to get to the root cause of many types of issues so that it can be addressed, rather than just focusing on symptoms of that problem.
- 1.11.5 When dissecting an incident, ask why the issue occurred. For each reason given, ask why that reason happened. After asking *why* repeatedly for every reason, the true root cause will be identified. The primary goal of the *Five Whys* is to take a problem and find the root cause so it can be addressed. When done properly, TERRY R PITT CONSTRUCTION can find the root cause of the problem to take actions to prevent it from happening again in the future.
- 1.11.6 The *Five Whys* does not have to be used as a stand-alone strategy. It is often used along with other solutions to help drive an investigation toward the root cause.

1.12 RECORDKEEPING

- 1.12.1 TERRY R PITT CONSTRUCTION requires all fatalities, injuries, illnesses, and near misses to be reported in a timely manner and as per the injury/illness reporting procedure. Once an injury or illness is reported, then a decision will be made to determine if the injury or illness is work related.
- 1.12.2 TERRY R PITT CONSTRUCTION provides 365-day availability to first aid treatment. For non-office locations, an onsite medical first responder will be provided.
- 1.12.3 Written records of all injuries and illnesses will be maintained by management. In addition, all work-related fatalities, injuries, or illnesses will be recorded per OSHA guidance which includes: work related cases, a new case, or meets one or more of the general (OSHA) recording criteria.
 - 1.12.3.1 All injuries or illnesses must be recorded if they result in any one of the following - death, days away from work, restricted work, transfer to another job, medical treatment beyond first aid, or loss of consciousness.
- 1.12.4 A member of management will record all work-related illnesses/injuries on the *OSHA 300 Log and Incident Report* or equivalent within seven calendar days of receiving information about the incident.
- 1.12.5 At the end of each calendar year, OSHA information will be verified. A TERRY R PITT CONSTRUCTION executive will certify, by signature, that they have examined the *OSHA 300 Log* and that they reasonably believe, based on their knowledge of the process by which the information was recorded, that the annual summary is correct and complete.
- 1.12.6 After a company executive certifies the annual OSHA recording is correct, a copy of the OSHA 300 summary must be posted in a conspicuous place where notices to employees are customarily posted at each establishment. The annual summary may not be altered, defaced, or covered by other material.

- 1.12.7 At a minimum the annual OSHA summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.
- 1.12.8 For purposes of record retention of the *OSHA 300 Log*, the privacy case list (if one exists), the annual summary, and the *OSHA 301 Incident Report* forms must be retained, on file, for five years following the end of the calendar year that these records cover.
- 1.12.9 During the storage period, *OSHA 300 Logs* or equivalent logs must be updated to reflect any newly discovered injuries or illnesses or if changes have occurred to the classification of a previously recorded case. If the description or outcome of a case changes, the original case must be removed or lined out and new information must be entered.

1.13 TRAINING

- 1.13.1 Training requirements relative to incident investigation and reporting will include awareness, first responder, and investigation. Training must be completed upon being hired or after a promotion into a supervisory position. Members of the investigation team will be trained, qualified, and competent and will understand their roles and responsibilities for incident response and be familiar with techniques used in incident investigation.
- 1.13.2 Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post incident phase.
- 1.13.3 Frequency of training will be based on owner/client requirements as well as governing authority requirements.

