

Incident Management

1. Purpose

The Incident Management Procedure describes the steps to be taken to ensure that all incidents, and injuries are reported through the appropriate channels and investigated appropriately.

The GVK Group is committed to:

- Report of all incidents internally within 24 hours
- Report of all injuries to workers resulting in the need for medical treatment or time off from work to the GVK Group state workers compensation insurer within 48 hours
- Initiate injury management and return to work services, where required
- Report deaths, serious incidents, injuries and illnesses to the state safety regulator within relevant timeframes
- Report notifiable/ reportable environmental incidents to the state regulator as required
- Promptly investigate incidents where required, and determine corrective actions
- Conduct the regular exchange of information in relation to incidents throughout GVK Group.

This procedure applies to all workers of GVK Group including managers, supervisors, contractors and workers.

2. Incident Reporting

To ensure information is as accurate as possible and that all failings can be learnt from, all incidents involving personal injury and/or property damage and/or environmental impact and/or a near miss are to be reported to a GVK Group supervisor or state manager as soon as possible and, when required, investigated as soon as possible after receiving notification of an incident.

Immediately following an incident, the following steps should be followed:

1. Any person sustaining an injury must be provided with appropriate first aid or further medical treatment.
2. When possible, the area of the incident is to be preserved and is to be made safe. If required, the area may be barricaded or cordoned to prevent disturbance or further impact. The area must not be disturbed until advised by a site manager or a Regulator Inspector.
3. The incident must be reported by the worker or an accompanying worker to their immediate supervisor or the site manager.
4. Where required, the supervisor will assist the worker to complete an Incident Report Form and gathering all related information.
5. The supervisor is to assist with the collection of witness statements, photographs of the incident site, risk assessments and other paperwork relevant to incident investigation.
6. The supervisor will gather as much initial information about the incident and circumstances leading up to it (if safe to do so and if practical).
7. As soon as practical, the supervisor will inform their state manager of the incident details and discuss how to best handle the situation.

Some incidents may be classified as “notifiable” or “reportable” and require reporting to a regulator (SafeWork NSW, WorkSafe QLD, Police, etc). Only GVK Group management will decide if such action is required and make such notifications.

All paperwork, including the Incident Report Form, must be provided to the supervisor and the relevant state manager BEFORE the end of the shift.

3. Preservation of a scene

A state WHS inspector or police officer may need to investigate the site where an incident has happened. Therefore, the incident site must not be disturbed until an inspector arrives. This is to protect evidence that may help determine the cause of an incident. However, workers can disturb an incident site if it's to:

- help a person with an injury
- remove a deceased person
- make the site safe or to minimize the risk of a further notifiable incident
- assist with a police investigation.

It's an offence to interfere with the site of an incident without permission of an inspector or police officer.

Requirements to make sure an incident site isn't disturbed only apply to the area where an incident happened, not the whole place of work. However, always wait for further instructions from a state manager or site supervisor before workers continue to work. In some cases, the entire worksite may be shut down and workers may be asked to leave the site so a formal investigation can be conducted.

4. Notification to Regulator

Certain workplace incidents and illnesses, and environmental incidents must be reported to SafeWork NSW or WorkSafe QLD, NSW Environment Protection Authority (EPA) or Queensland Department of Environment and other regulatory agencies. These are called ‘Notifiable’ or ‘Reportable’ incidents and these must be advised to the appropriate authority within certain timeframes.

Notification to a regulator will only be undertaken by a state manager or delegate, after discussion with the GVK Group Director.

Notification of Safety Incidents

Certain workplace incidents, injuries, and illnesses must be reported to the state safety regulator immediately after becoming aware of a serious work-related injury or dangerous incident or death.

These are called ‘Notifiable Incidents’ and include:

- the death of a person
- a ‘serious injury or illness’, or
- ‘dangerous incident’

Serious Injury or Illness

A serious injury or illness is where the person requires:

- medical treatment within 48 hours of being exposed to a substance;

- immediate hospital treatment as an in-patient; and/or
- immediate medical treatment for:
 - amputation
 - serious head injury
 - serious eye injury
 - serious burn
 - separation of skin from underlying tissue (e.g. de-gloving)
 - spinal injury
 - loss of bodily function
 - serious laceration.

A 'Dangerous Incident' includes:

- An uncontrolled escape, spillage or leakage of a substance
- An uncontrolled implosion, explosion or fire
- An uncontrolled escape of gas or steam
- An uncontrolled escape of a pressurised substance
- Electric shock (generally from the mains, does not include static or voltage less than 50VAC or 120VDC.)
- The fall or release from a height of any plant, substance or thing
- The collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be design or item registered under the work health and safety regulations
- The collapse or partial collapse of a structure
- The collapse or failure of an excavation or of any shoring supporting an excavation
- The inrush of water, mud or gas in workings, in an underground excavation or tunnel, or
- The interruption of the main system of ventilation in an underground excavation or tunnel

Notification of Environmental Incidents

An environmental incident need not necessarily be a breach of legislation. Environmental incidents that are to be reported to the relevant state environmental department or authority include (but are limited to) the following:

- spills of fuels, oils, chemicals and other hazardous materials;
- unauthorised discharge from sediment basins or other containment devices;
- unauthorised clearing or clearing beyond the extent of the project boundary or premises;
- inadequate installation and subsequent failure of temporary erosion and sediment controls;
- any adverse health or well-being impacts on persons due to activities by RMS or its contractors causing adverse environmental conditions;
- an unexpected find of contaminated soils or other potentially hazardous substances;
- unauthorised damage or interference to threatened species, endangered ecological communities or critical habitat;
- unauthorised harm to Aboriginal objects and Aboriginal places; or

- unauthorised damage to any state or locally significant relic or heritage item;
- unauthorised damage to protected marine vegetation and mangroves;
 - dredging or reclamation works within a watercourse without appropriate authorisation;
 - potential contamination of waterways or land;
 - accidental starting of a fire or a fire breaking out of containment;
 - any potential breach of legislation, including a potential breach of a condition of: an environment protection licence; NSW Department of Planning and Infrastructure (DP&I) approval; development consent; or any agency permit condition;
 - works undertaken without appropriate approval or assessment under the Environmental Planning & Assessment Act 1979 (NSW).
 - works undertaken that are not in accordance with a determined Review of Environmental Factors (REF) and
 - unauthorised dumping of waste.

The state manager will determine if notification to the state environmental department or authority as required on a case by case basis.

Should an environmental incident have the potential to impact on a drinking water supply, the relevant water supply authority must also be advised.

5. Incident Investigation

If the incident/ injury / event is deemed to be minor with limited potential future consequences, investigation may be deemed to be not required following treatment (e.g. first aid applied for a paper cut).

Incidents and Levels of Investigation

The type and level of investigation is determined by the severity or harm rating. All incidents with the highest severity rating are required to have a thorough investigation process completed, such as ICAM. The Incident investigation analysis increases with the level of severity.

Level 3 Incident Cause Analysis Method (ICAM) investigation will be conducted by persons competent and trained in this method of incident investigation.

Severity	Injury	Environment	Property	Quality
Near Miss	No injury or illness	No damage	No damage	Material supply concerns.
Minor	Injury does not require first aid treatment. No Lost Time Injury	Minor pollution incident (e.g. <5L hydrocarbon spill) (no impact to local community)	<\$2,000	Calibration concerns. Material supply non conformance. 1 non conformance.
Moderate	Injury requires first aid treatment. Medical treatment (refer to definition) Significant injury (refer to definition) Lost Time Injury	Moderate pollution incident (e.g. 5-20L hydrocarbon spill) (no impact to local community)	\$2,001-\$10,000	2-5 Non conformances of same issue.
Severe	Serious Injury or illness (refer to definition) Dangerous incident (refer to definition) Lost Time Injury	Environmental incident (refer to definition) PIRMP implemented. EPA / QLD Dept. Environment Notification. Sensitive local environment. Impact on local communities (consider weather, time of day, etc.)	\$10,001-\$50,000	>5 non conformances of same issue.
Extreme	Death SafeWork NSW, Worksafe QLD or Police involvement	EPA / QLD Dept. Environment involvement	>\$50,001	Failure of Quality Management System

Incident Investigation Analysis Levels

Incident Report Form	Level 1 Investigation	Level 2 Investigation	Level 3 Investigation
Incident Report Form to be completed. Causal investigation required. A repeat near miss or minor requires a Level 1 investigation.	Incident Report Form to be completed. Level 1 investigation Causal factors Task control issues Process control issues Management system issues	Incident Report Form to be completed. Level 2 investigation Causal factors Task control issues Process control issues Management system issues Organisational culture issues 5 Whys	Incident Report Form to be completed Level 3 investigation ICAM Team of Subject Matter Experts (SME) to be assembled Est. 3-5 days for full investigation and report to be provided

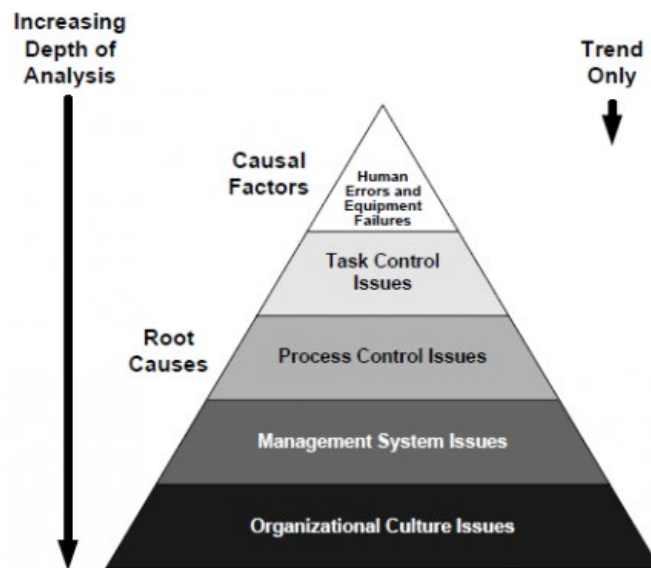


Figure 1: Incident Investigation Level of Analysis

If an investigation is deemed to be required, the relevant state manager or the competent designated person, will conduct an investigation using the Incident Investigation Report Form. The report should be fully completed and contain all required information.

Copies of all Incident Investigation Reports will be filed for future reference.

Investigation process

The steps of the investigation process include the **collection** of information from People, Place, Parts, Processes and Paperwork; the **analysis** of that information; and the **sharing** of conclusions.

Collection of information

People

Witnesses will be interviewed about the event and list the sequence of events leading up to the incident, the incident itself and any medical treatment or work done at the scene after the incident, where they are able. This can unearth the immediate cause of the incident in most instances.

Place

The location of the incident should be examined to assist in understanding what happened and what was the cause. The variable of the environment (time of day, weather, how busy) should also be considered and noted.

Parts

Equipment or materials need to be examined and evaluated to determine if there is a latent flaw in their operation, if they are intrinsically unsafe, if poor maintenance was the result of the incident and so on. Consider also what the equipment didn't do, include safety mechanisms or if it failed to perform as usual.

Process

The activities being carried out at the time should be evaluated; including the work process, scheduling, supervision or any decisions made that may have contributed to the event.

Paperwork

Finally, review any documentation related to the task or the event. These might include training records, hazard reports, previous incident reports, inspection records, existing policies and procedures, SDS or any other appropriate documentation.

Analysis

The collected data then needs to be analysed to determine the cause/s of the incident.

For a level 2 investigation a '5 Why's Analysis' involves asking "Why" up to and beyond five times, to identify the underlying causes of the incident.

After conclusions are drawn as to the cause, the recommendations to prevent a similar occurrence should be developed with consideration made to the hierarchy of controls.

As part of the Incident Investigation Report, the contributing factors are to be identified and recorded.

Sharing of conclusions

Information on incidents will be reviewed and communicated at the next relevant meeting and will be monitored for the progress of any required actions.

The findings of the investigation and the development of control / preventative measures will be discussed with relevant personnel, with a full report forwarded to GVK Group senior management for review.

Information on incidents will also be shared with workers (after being cleared of personal/private details) to promote identification of other hazards and prevention of other injuries.

6. Education and training

Employee information on incident management processes at GVK Group will occur as part of the induction process.

7. Review

This procedure remains in force until such time as it is withdrawn or amended by way of undertaking a review and an updated version is issued. As a guideline, this procedure will be reviewed by senior management every two years.

8. Breach

Employees are required to comply with this procedure as a condition of their employment. Any breach of this procedure may lead to disciplinary action. Employees wishing to discuss any aspect of this procedure should contact their manager.

9. Relevant Acts and Regulations

Work Health and Safety Act 2011 (NSW)

Work Health and Safety Regulation 2017 (NSW)

Work Health and Safety Act 2011 (QLD)

Work Health and Safety Regulation 2011 (QLD)