

GOOD CATCH, NEAR MISS & INCIDENT MANAGEMENT & INVESTIGATING PROCEDURE

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PURPOSE

The purpose of this Good Catch, Near Miss, Incident & Investigation Policy and Procedure is to ensure that incidents are investigated according to the injury, or injury potential of an event, in accordance with Hundseth Powerline Construction and the Occupational Health and Safety Acts and Regulations. This will help to control further losses of human and material resources by identifying and correcting unsafe acts and conditions that lead to or have the potential to lead to an incident.

SCOPE

This Policy applies to all divisions within Hundseth Power Line Construction herein to referred to as "Hundseth," "HPL" or the "Company."

DEFINITIONS

Good Catch: Recognition by an employee of a condition or situation that had the potential to cause an incident or near miss but did not cause one due to corrective action and/or timely intervention by the employee.

Near Miss: A work-related event(s) that had the potential to cause injury or ill health (regardless of severity) to a person(s) or damage to tools, equipment, facilities, or material.

Incident: A work-related event(s) that had caused injury or ill health (regardless of severity) to a person(s) or damage to tools, equipment, facilities, or materials.

Injury/ Illness: An abnormal condition or disorder, further classified in the following:

Fatality: An occurrence of death by incident or from disease.

Lost Time Injury: An injury that result in a disability of an employee or an employee missing work due to an injury.

Medical Aid: An injury that received medical treatment by a doctor or medical professional.

First Aid: An injury that requires a single first aid treatment and observation involving minor injuries, which do not ordinarily require medical care.

Occupational Illness: An event or exposure that occurs in the workplace that causes or contributes to a condition or worsens a preexisting condition.

Recordable Injury: Any work-related injury or illness requiring medical treatment received by a doctor or medical professional.

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Major Injury: An injury of a serious nature that places a life in jeopardy, produces unconsciousness and or results in substantial loss of blood.

Motor Vehicle Incident (MVI): When a vehicle collides with another vehicle, stationary or moving object, or person resulting in injuries, death, and or loss of property.

Utility Contact: A human driven event where contact, damage to, or disruption to an overhead or underground utility service occurred.

Dangerous Occurrence: any occurrence that does not result in, but could have resulted in, a condition or circumstance that includes:

- a) The structure failure or collapse of:
 - a. A structure, scaffold, temporary falsework, or concrete formwork; or
 - b. All or any part of an excavated shaft, tunnel, caisson, coffer dam, trench or excavation;
- b) The failure of a crane or hoist or the overturning of a crane or unit of powered mobile equipment;
- c) An accidental contact with an energized electrical conductor;
- d) The bursting of a grinding wheel;
- e) An uncontrolled spill or escape of a toxic, corrosive or explosive substance;
- f) A premature detonation or accidental detonation of explosives;
- g) The failure of an elevated or suspended platform; and
- h) The failure of an atmosphere-supplying respirator.

Environmental Incident: An occurrence or set of circumstances, because of which pollution (air, water, noise, or land) or an adverse environmental impact has occurred, is occurring, or is likely to occur.

Notice of Contravention: A formal enforcement document that identifies a contravention of the Saskatchewan Employment Act and or Regulations by an Occupational Health & Safety Officer.

Root Cause: The most basic cause (or causes) that can reasonably be identified that management has control to fix and when fixed, will prevent (or significantly reduce the likelihood of) the problem's recurrence.

Corrective Action: Corrective actions are developed in response to a recommendation to prevent future incidents from occurring.

Recommendation: A potential solution issued as part of an investigation to prevent future incidents and used to develop corrective actions.

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Emergency: A present or imminent event that requires prompt coordination of actions or special regulation of persons or property to protect the health, safety, or welfare of people, or to limit damage to property and the environment.

Incident Owner: The individual who is accountable for the investigation that approves corrective actions that are created in response to recommendations arising from an investigation.

Lead Investigator: The lead investigator for minor incidents shall be the incident owner or designate. The Lead investigator for Major and Serious incidents shall be assigned from the HSET division.

Investigation: Gathering of evidence for analysis of an incident with the intent of establishing root cause, contributing factors, and providing recommendations for preventing future incidents.

Environment: The surroundings in which Hundseth operates including air, water, land, natural resources, flora, fauna, humans and their interrelation.

Privileged and Confidential: A document which is produced for the purpose of using its contents to obtain legal advice or to aid in the conduct of litigation or defense of a regulatory action is privileged and must be kept confidential.

ROLES & RESPONSIBILITIES

All Employees

- Report all incidents, near misses and good catches as soon as it is safe to do so.
- Assist with an incident scene as directed by the incident owner or lead investigator.
- Provide any details from an incident to help determine root cause and prevent recurrence.
- Cooperate during the incident investigation process including participating in interviews as requested.
- Provide First Aid treatment if trained to do so.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET division or manager.
- Provide any details regarding their medical aid injury and work towards a successful return to work.
- Complete a W1 Injury form with HSET.

Foreman/ Supervisors

- Report all incidents, near misses and good catches as soon as it is safe to do so.
- Encourage reporting from all staff.
- Participate in the root cause analysis.
- Cooperate during the investigation process.

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- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET division or manager.

Managers/ Assistant Managers

- Act as the lead investigator for any Minor incident investigations.
- Act as Incident Owner for any Minor, Serious or Major incident investigations.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET.

Vice President

- Take on the role of Incident Owner for Serious incidents in their area of responsibility or assign a designate.
- Ensure the required information is maintained in the Safety Management System.
- Cooperate and ensure participation in the investigation.
- Evaluate and cooperate in recommendations stemming from the incident investigation and initiate corrective or preventative actions required.
- Ensure corrective or preventative actions and verification of effectiveness have been appropriately prioritized and completed as scheduled.
- Discuss the details of incidents with legal counsel as required.
- Lead media contacts if required.
- Assist in internal external key messaging/ communication activities as required at the time of an incident occurrence or post incident follow-up.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET.

President/CEO

- Monitor incidents and investigation.
- Cooperate, stay informed and provide resources from respective areas to support and increase the effectiveness of investigations.
- Allocate resources to ensure the implementation of incident corrective actions.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET.

Occupational Health & Safety Committee

- Be involved in relevant incidents as required.
- Participate in investigations when required.
- Participate in other investigations at the request of the Incident Owner.

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- Have access and review incident reports and investigations for all health and safety incidents at regular meetings. Except for those marked privileged and confidential.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET.

Incident Owner

- Own the incident that occurred in the assigned operational area of responsibility.
- Act as the primary contact for the incident and development of corrective actions.
- Assign staff to the Corrective Action Team (if required)
- Review draft investigation reports prior to being finalized for Serious and Major incidents.
- Responsible to create the investigation report for Minor and Major incidents.
- Approve all developed corrective or preventative actions upon completion of the investigation.
- Accountable for ensuring the completion of corrective actions resulting from the investigation.
- Maintain confidentiality of records including the Formal Investigation Report if required.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET.

Lead Investigator

The lead investigator is not required to be a subject matter expert in the operational area where the incident occurred. However, the Lead Investigator should ensure that supporting subject matter experts are identified prior to the start of the investigation.

- Set the terms of reference the investigation with the Incident Owner, including communication expectations.
- Act as the primary contact for the investigation.
- Work with the Incident Owner to set the investigation team and coordinate the investigation team, when appropriate.
- Conduct interviews and analyze evidence.
- Identify root causes and provide recommendations based on evidence gathered throughout the investigation.
- Hold a formal review of the incident and present findings and recommendations to the Incident Owner (and Corrective Action Team, if applicable) and participate on the Corrective Action Team.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET.

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Corrective Action Team

- Is informed for Serious and Major level incidents at the direction of the Incident Owner to develop appropriate corrective or preventative actions in response to the recommendations outlined in the investigation report.
- Shall develop the verification of effectiveness criteria for each corrective action.

Health, Safety, Environment & Training Division (hereinto referred to as HSET)

- Own the reporting and investigation process and methodology for all Health, Safety, Environment & Training within HPL.
- Provide administrative and technical support for the application of the Incident Reporting and Investigation Process for all Health, Safety, Environment & Training incidents.
- Assign a Lead Investigator for serious and major investigations for all Health, Safety, Environment & Training incidents.
- Provide support to operational staff that lead minor incidents.
- Provide centralized distribution of incident statistics and related key indicators and conduct regular trending and analysis for incidents.
- Communicate information and findings for incidents.
- Participate in the monitoring of the identified corrective or preventative actions and verification of effectiveness.
- Provide support in relation to Health, Safety & Environment regulatory requirements relevant to incidents.
- Maintain confidentiality of records including the Formal Investigation Report, if required.
- Consult Law to obtain legal advice in contemplation of litigation and/or regulatory action.
- Ensure that regulated health & safety incidents are reported to Occupational Health and Safety and the Workers Compensation Board.
- Ensure that regulated environmental incidents/ impacts are reported to Environment Canada, Ministry of Environment and/or any other applicable regulatory agency.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.

People & Organizational Culture

- Identify human behavior issues and indicate what triggers should initiate when investigator should consult with People and Organizational Culture division.
- Conduct a separate investigation when human behavior issues are identified in a Health and Safety or Environment investigation.
- Own the reporting and investigation process and methodology for all People and Organizational Culture incidents within HPL.
- Provide administrative and technical support for the application of the Incident Reporting and Investigation Process for all People and Organizational Culture incidents.

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- Assign a Lead Investigator for serious and major investigations for all People and Organizational Culture incidents.
- Ensure confidentiality on all incidents to all sources not involved in the investigation.
- Direct any questions or concerns regarding the incident to the HSET.

PROCEDURE

Incident Reporting

After an incident occurs, the following general steps shall be followed:

1. Provide Initial Emergency response.
2. Document the report in eCompliance.
3. Investigate when required.

Initial Response

1. Recognize that an incident has occurred
2. Complete an initial assessment of the incident to determine the following:
 - a. What has occurred;
 - b. When the incident occurred;
 - c. Who was involved;
 - d. What resources have responded thus far (if any); and
 - e. What is required to control the scene and prevent further loss?
3. Determine if emergency response is required. If the incident is an “emergency”, follow the applicable Emergency Response Plan.
4. Prevent further loss by determining and implementing an interim measure to mitigate the risk of reoccurrence if required. Ensure injured people receive medical attention if required. It is advised to not disturb the incident scene more than is necessary to make the scene safe, stop and contain the spill or to secure the facility or area.
5. Verbally notify the responsible Manager and the HSET division of the incident and the appropriate personnel as per the incident reporting in Table 3. Note that for all Major incidents, where involved employees are in a safety sensitive position, a drug and alcohol test must be done as detailed in the Drug and Alcohol Policy.

Incident Documenting

NOTE: It is expected that all incidents will be entered into eCompliance within 8 business hours.

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HPL Employees:

After verbally notifying the responsible manager of the incident, as soon as it is safe to do so, that manager should consult the Incident Reference Chart in Table 2 below.

For Serious and Major incidents, the manager, HSET division, People & Organizational Culture division or designate shall obtain statements from anyone involved in or witnessing the incident. Statements can be obtained but are not require for Minor incidents. Statements must be provided individually, not in a group, and returned to the manager, HSET division, People & Organizational Culture division or designate.

The manager/ assistant manager is responsible to ensure the incident is entered into eCompliance but may delegate an employee to enter the incident. Attach any relevant documents, pictures and filled out forms to the submission. Preliminary incident Severity Classification is mandatory and must be completed by the person entering the incident.

The manager/assistant manager is responsible for verbally communicating the incident to the Customer. The HSET division will communicate the written incident report to the Customer after the report has been reviewed and properly restricted and/or vetted (if required.)

The Incident Owner is required to verify the preliminary incident severity classification in the eCompliance system. Timelines for submitting information are identified in Table 3 Classifications and Timelines below.

If the verified incident severity is changed from the initial incident severity, changes will be communicated to all parties including the HSET division or the People & Organizational Culture division as required by the adjusted severity rating in the Incident Reference Chart. The HSET division or the People & Organizational Culture division will ensure that confidential information is properly restricted and/or vetted (if required) prior to widespread communication of an incident.

Good Catch, Near Miss & Incidents (see Table 1 for examples) may be categorized as the following (see Table 2 for examples and guidelines):

- Good Catch
- Near Miss
- Injury/ Illness
- Equipment Damage/ Loss
- Tool Damage/ Loss
- Property Damage/ Loss

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- Motor Vehicle Incident
- Utility Contact
- Environmental
- Harassment/ Violence
- Non-Conformance

Medical Aid/First Aid

All medical aids and first aids must be reported as soon as it is safe to do so to the HSET division.

For all Medical Aids, the HSET division shall report the injuries to the Workers Compensation Board within 5 business days of the injury and complete an HPL Reportable Injury Form in eCompliance.

If an employee requires modified duties the HSET and People and Organizational Culture division will follow the Return-to-Work Policy and complete a Return-to-Work form with the employee.

Dangerous Occurrence

All dangerous occurrences must be reported as soon as it is safe to do so to the HSET division.

The HSET department will communicate the incident to the Occupational Health and Safety Division within 48 hours and the investigation once it is complete.

Table 1

Classification	Example
<i>Good Catch</i>	When a Good Catch occurs, no harm injury, illness or damage occurred, however the potential was noticed prior to becoming a more serious outcome. Good Catches are classified as Minor. EX: An employee walks under a door fame and sees a brick on top that has the potential to fall and hurt an employee.
<i>Near Miss</i>	When a Near Miss occurs, no harm injury, illness or damage occurred, however the situation was such that there was potential for a more serious outcome. Near misses are classified as either Minor, Serious or Major. Ex. An employee walks under a door fame and a brick falls but misses the employee and does not cause an injury or damage.
<i>Incident</i>	When an Incident occurs, harm, injury or damage has occurred. Incidents are classified as either Minor, Serious or Major based on the actual outcome and or potential outcome. Ex. An employee walks under a door fame and a brick falls and hits the employee causing an injury or damage.

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The most serious outcome across all categories shall be used to classify the incident, however the report can contain more than one classification.

Table 2 provides examples that shall be used for guidance when establishing the severity of the actual and or potential outcome of the Good Catch, Near Miss, or Incident.

Note: for all incidents that may not be listed in Table 2 Incident Reference Chart, please contact the HSET division to clarify classification.

Table 2

Hundseth Powerline Construction Incident Reference Chart	
Good Catch	
Minor	Examples: <ul style="list-style-type: none"> Identifying an uneven or slippery surface and applying a control (i.e. salt on ice) Moving an object that could fall from a ledge Finding a deficiency in a tool before operating it Catching a finding or deficiency on a daily vehicle pre-trip inspection
Note: All Good Catches will be classified as a Minor.	

Injury/Illness	
Minor Near Miss	Examples: <ul style="list-style-type: none"> Non treatment injuries Slip or trip but did not fall Potential injury to public
Serious Near Miss	Examples: <ul style="list-style-type: none"> Potential for a serious injury Open excavation that is not barricaded or signed Mobilizing equipment near an unidentified power line Working at heights without wearing the required PPE Isolation incidents (guarantee of isolation, construction isolation, switching, recloser block, grounding) A breach of using or following a procedure, process or standard that had the potential for a serious incident. A violation of limits of approach A compliance or stop work order from a government body
Minor Incident	<ul style="list-style-type: none"> First aid as per definition First aid kit used

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Serious Incident	<ul style="list-style-type: none"> Occupational illness Medical aid as per definition Modified duties required
Major Incident	<ul style="list-style-type: none"> Fatality Lost time incident

Property/ Equipment/ Tool Damage	
Minor Near Miss	<ul style="list-style-type: none"> Fire hazards are present, and precautions are not taken to address the risk (ex. Idling in tall grass in warm/dry weather, welding in a dry area without wetting the ground prior)
Serious Near Miss	<ul style="list-style-type: none"> Fire near Hundseth asset(s) or has the potential to spread to Hundseth asset(s) The controls from the Hazard, Aspect and Risk Assessment were not implemented to protect the work zone Unsecured load where equipment fell – no impact to public or property Potential for serious tool, equipment, facility, or property damage Weather conditions existed that could lead to a fire spreading out of control (high winds, dry conditions etc.)
Minor Incident	<ul style="list-style-type: none"> Property damage under \$5,000 Vehicle incident with damage under \$5,000 Preventable vehicle incident An ignition occurred and the fire is contained but did not spread to another fuel source Property damage to exterior of site (ex. Perimeter fence, building, etc.) with no entry gained. Property damage minor in nature Trespassing Car prowling with access into vehicle Tailgate resulting in unauthorized access Minor theft Lost or stolen keys
Serious Incident	<ul style="list-style-type: none"> Property damage between \$5,000 to \$50,000 Vehicle incident with damage between \$5,000 - \$10,000 An ignition has occurred on an Hundseth asset, and the fire spread to other fuel sources, such as grass, trees, crops, property, etc

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	<ul style="list-style-type: none"> An ignition has been caused by an employee or contract and a fire starts on a fuel source such as grass, trees, crops, property, etc A fire is ignited with the potential of spreading due to weather conditions (ex. High winds, dry conditions) and the fire department is called to prevent the spread of the fire Low risk of Fines and or litigation Property damage serious in nature Lost or stolen keys and used for entry. Serious theft Property damage to exterior of site (ex. Perimeter fence, building, etc.) with entry gained. Trespassing to complete an action Unauthorized access Threat or harm or damage
Major Incident	<ul style="list-style-type: none"> Property Damage exceeding \$50,000 Vehicle incident with damage above \$10,000 A fire caused by an employee, contractor, or asset that has spread beyond and caused property damage, loss of life, loss of reputation. A fire caused in a high-risk fire area High risk of Fines and or litigation Major theft

Motor Vehicle Incident (MVI)	
Minor Incident	<ul style="list-style-type: none"> Minor Near Miss and Damage, and No Injury
Serious Incident	<ul style="list-style-type: none"> Serious Near Miss, Minor or Serious Injury or Damage
Major Incident	<ul style="list-style-type: none"> Major Near Miss or Major Injury or Damage

Utility Contact	
Minor Near Miss	<ul style="list-style-type: none"> Exposing a communication line
Serious Near Miss	<ul style="list-style-type: none"> Encroachment on a National Energy Board Line Exposing an electrical or gas line

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Minor Incident	<ul style="list-style-type: none"> • No chance of injury or Minor Near Miss • Communication line contact
Serious Incident	<ul style="list-style-type: none"> • Minor or Serious Near Miss Injury • Secondary Electrical or Low-Pressure Gas Line
Major Incident	<ul style="list-style-type: none"> • Serious Near Miss or Serious or Serious Injury • Primary Electrical and or High-Pressure Gas Line • National Energy Board Contact

Environmental	
Minor Near Miss	<ul style="list-style-type: none"> • Release of less than 5 liters of: <ul style="list-style-type: none"> ○ In-service PCB electrical insulating oil (<50 ppm) resulting in a cumulative PCB release of <0.75 grams ○ Any environmentally sensitive liquid (not including battery acid) • Any non-conformance with a Hundseth standard, procedure, or project specific environmental requirement that can be rectified immediately.
Serious Near Miss	<ul style="list-style-type: none"> • A release of in-service PCB electrical insulating oil (<50ppm) resulting in a cumulative PCB release of >0.75 grams of PCB but less than 1.0 grams of PCB. • An action or event that had the potential to result in a Serious Environmental incident.
Minor Incident	<ul style="list-style-type: none"> • Release of greater than 5 liters of: <ul style="list-style-type: none"> ○ In-service PCB electrical insulating oil (<50ppm) not resulting in a cumulative PCB release of >0.75 grams. ○ Any environmentally sensitive liquid (not including battery acid) ○ Any release of battery acid <5L. ○ A release of a greenhouse gas (ex. refrigerants, SF6, CF4) less than 10 kg or less than a 10-minute sustained release. • An activity that results in the death or injury of wildlife listed as “non-licence animals.” • Discovery of dead or injured wildlife on or within Hundseth facilities • Any non-conformance with a Hundseth standard, procedure, or project specific environmental requirement that can be rectified immediately.
Serious Incident	<ul style="list-style-type: none"> • Release of greater than 50 liters of: <ul style="list-style-type: none"> ○ In-service PCB electrical insulating oil (<50ppm) resulting in a cumulative PCB release of >0.75 grams. ○ Any environmentally sensitive liquid >50L (not including battery acid) • Any release of battery acid >5L.

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	<ul style="list-style-type: none"> A release of a greenhouse gas (ex. refrigerants, SF6, CF4) greater than 10 kg or greater than a 10-minute sustained release. A product or substance released in any volume to a surface water body (including a wetland or watercourse) or groundwater. The disposal of waste at an unauthorized waste management facility. An activity that results in the disturbance or death of a migratory bird, disturbance or destruction of legally protected habitat, or injury/death of a species-at-risk. Deposition of a substance that is harmful to migratory birds, or permitting such a substance to be deposited, in waters or an area frequented by migratory birds or in a place from which the substance may enter such waters or such an area. Commencement of construction, operations, or maintenance activities or works without the proper environmental approvals or notifications in place Any activities or works that are in non-compliance with the conditions of provincial or federal regulations, legislation, authorization, or approval. Formal notice of investigation or an environmental order issued by a provincial or federal environmental regulatory agency.
Major Incident	<ul style="list-style-type: none"> Stop work order a provincial or federal environmental regulatory agency. Incident resulting in a serious adverse effect on the environment. Charges, fines, or administrative penalties laid by a provincial or federal environmental regulatory agency.
Harassment/ Violence	
Minor Near Miss	<ul style="list-style-type: none"> Vicious animal or human in the area
Serious Incident	<ul style="list-style-type: none"> Verbal aggressive or threatening behaviour Socially excluding or isolating someone Persistently criticizing, undermining, belittling, demeaning, or ridiculing someone Swearing at someone or using inappropriate language to them Abusing authority by publicly ridiculing or disciplining a subordinate Abusing authority by interfering with a subordinate’s performance or job Threat of vicious animal in the area Displaying offensive posters, cartoons or images of a sexual nature Sending inappropriate electronic communications. Making abusive or derogatory remarks or jokes about someone’s gender, gender identity or gender expression, sex or sexual orientation.

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Serious Incident	<ul style="list-style-type: none"> Spreading malicious rumours or gossip about an individual or a group. Physical threat or attack on an employee Evacuation of site (threat or event) Using the internet to harass, threaten or maliciously embarrass someone Abusing authority by soliciting a sexual or romantic relationship from a subordinate, or making social invitations with sexual overtones to a subordinate Using the internet to make sexual threats, or to harass or exploit someone sexually Sexual assault or touching Sexual invitations or requests in return from a promise, promotion or reward Physical assault Domestic violence. Damaging, hiding or stealing someone’s personal belongings or work equipment.
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Non-Conformance	
Opportunity for Improvement	<ul style="list-style-type: none"> An improvement action to meet internal or customer requirements or enhance internal or customer satisfaction Areas of practice in need of improvement Improvement priority for the institution Opportunity to improve from an auditor’s experience in the industry
Minor Non-Conformance	<ul style="list-style-type: none"> A single observed lapse or isolated incident Minimal risk of nonconforming product or service A drawing marked up with unauthorized changes A purchase order released without review and approval An inspection instrument past its calibration date. A training record not available
Major Non-Conformance	<ul style="list-style-type: none"> Construction not completed as per given design/drawing Deviation from the project specification Work fails to meet agreed quality standards Several minor non-conformances related to the same clause No documented procedure Document changes routinely carried out in an unauthorized manner Major purchases made from unevaluated suppliers. Product purchased without required inspection and tests.

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Table 3 Classifications and Reporting Requirements

Injury/ Illness, Environment, Line Contact, Property Damage, Tool Damage, Equipment Damage, Motor Vehicle Incident	Verbal/ Written Notification to the Operations Manager & the HSET Division within 2 hours	Verbal/ Written Notification to the Vice President/President & CEO within 2 hours.	Preliminary Report or Bulletin Required within 24 hours	Conference Call required within 24 hours.	Investigation Required	Final report required within 7 calendar days	Notify OH&S	Notify WCB	Final report required within 48 hours including learnings.
Minor	Yes	No	No	No	Yes	Yes	No	No	No
Serious	Optional	Optional	Optional	Optional	Yes	Yes	Yes	Yes	No
Major	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Good Catch Reporting									
Minor	No	No	No	No	No	No	No	No	Yes
Near Miss Reporting									
Minor	No	No	No	No	No	No	No	No	Yes
Serious	Optional	Optional	Optional	Optional	Yes	Yes	No	No	No
Major	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No

INVESTIGATING

Investigations will be prioritized and performed in accordance with the verified incident severity rating.

The incident severity rating may be re-evaluated throughout the investigation process as new information presents itself.

Conflict of Interest



GOOD CATCH, NEAR MISS & INCIDENT MANAGEMENT & INVESTIGATING PROCEDURE

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For Serious or Major investigation prior to accepting the roles of Incident Owner, Lead Investigator or a member of the investigation team, the individual must fill out a Disclosure of a Conflict-of-Interest Form on eCompliance. If a conflict is declared, please forward the form to the Director of Health, Safety, Environment and Training.

For Minor investigations, it is assumed there is no conflict of interest, and the form is not to be completed. In the event there is a conflict of interest, the form must be filled out and a copy forwarded to the Director of Health, Safety, Environment and Training and a copy will be attached to the incident report form in eCompliance.

The Conflict-of-Interest form is used to assist in determining if someone has a conflict of interest in an investigation. In general, a conflict may exist if:

- A direct or indirect relationship (former employee, friends of employee, extended family) with parties involved in the incident (financial, professional, or personal interest.)
- An individual involved directly, present, and on-site on the job that resulted in the incident.
- An individual who developed the policies/ standard procedures involved in the incident when it appears the policy/standard procedure was insufficient.
- Any other relationship or interest that could result in a conflict of interest.

Managing the staff involved in an incident does not mean that the Manager has a conflict of interest unless the Managers actions or direction caused the incident.

Note: filling out the Conflict-of-Interest form at the start of the investigation does not excuse a person from declaring a conflict of interest later once additional information is available.

Investigation Requirements

Incidents as defined in the Incident Reference Chart will be investigated at a minimum as follows:

- **Minor** – Requires a brief investigation by the Supervisor (or designate) of the employee involved in the incident. The Supervisor (or designate) acts as both Lead Investigator and Incident Owner. This may be as short as a few minutes to understand what occurred and fill out the appropriate incident report in eCompliance.
- **Serious** – Requires an investigation by the HSET division or the People & Organizational Culture division (or designate). The HSET and or the People & Organizational Culture division acts as the Lead Investigator and the Manager of the area acts as the Incident Owner. The Supervisor will fill out an incident report in eCompliance and the HSET division or the People & Organizational Culture division will complete the investigation form.

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- **Major** – The incident owner is assigned and must be a Director or higher level. A Lead Investigator is assigned from the HSET department. If there is a conflict of interest or a fatality the investigation will be contracted out to another source.

Note: the '5-Why' methodology is encouraged to determine the root cause(s). The HSET division will offer support to Managers during investigations for Minor Incidents and/or Near Misses.

Gathering Evidence

During the investigation, the investigator and/or investigation team shall gather evidence to assist in determining root causes involved in the incident or near miss such as the following:

- Diagrams
- Maps
- Detailed and structured interviews of the involved persons and/ or witness interview accounts
- Photographs
- Measurements
- Videos
- Plot/Site Plans
- Hazard and Risk Assessments
- Samples of soil, water, noise, or air
- Equipment or Tools
- Documents (reports, monitoring data, emails, access logs, traffic plans, locates, etc)

Record details immediately as the incident site may be subject to rapid change or destruction. Include details such as:

- Witness Statement Forms are filled out
- Law enforcement or regulatory involvement (if applicable)
- Position of equipment (hoists, vehicles, controls)
- Position of materials (chemicals, loads, spill)
- Preventative devices in use (guards, valves, locks)
- Ergonomic conditions (lighting levels, position of machinery controls)
- Environmental impacts (weather conditions, near a body of water, at risk species)
- Housekeeping (debris)
- Physical evidence of drug or alcohol paraphernalia

As part of the investigation, an investigator may seize any HPL owned asset as evidence.

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All seized evidence should be documented within the Investigation form. A lock out tag must be placed on the item if the item is being stored in a public area, for example equipment or large tools.

Seized evidence must be kept and stored in an appropriate secure container. An exception would be the period of time which an exhibit is being forensically acquired and analyzed at which time; the exhibit shall be stored within a secure room.

Evaluate Data and Conduct Interviews

Based on the initial evidence, such as Witness Statements, a selection of interviewees will be required to verify information and clarify facts and provide additional details for the investigation. It is best practice to conduct these interviews separately for each interviewee and not as a group.

Investigators are encouraged to remind interviewees at the start of the interview the focus on the investigation process is to prevent future incidents and not assign blame.

If the investigator suspects there may be an intentional breach of company policies, standards or process the lead investigator will inform the Incident Owner and People and Organizational Culture division. The People and Organizational Culture division will provide support for any additional required discussion with the employee and any disciplinary matters are outside the scope of the incident investigation.

Complete Root Cause Analysis

It is important to find the root causes of the event and not focus on the superficial issues.

For Serious and Major investigation, the '5 Why' methodology is encouraged to determine root cause(s). The methodology uses an interrogative technique to explore the cause-and-effect relationships underlying a particular problem.

Develop Recommendations

Once the investigation interviews and root causes are completed, appropriate recommendations can be identified to preventing similar incidents from occurring.

Recommendations are typically more permanent solutions and may require more time to accomplish.

Recommendations should be written with the context that they will be used to develop corrective actions.

Recommendations should all be practical and reasonable.

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Investigation Reporting

Formal investigation reports are not required for Minor; instead, this function is met by filling out the incident report on eCompliance. Serious and Major investigations are required on an investigation form in eCompliance.

One the report is drafted it will be reviewed and signed off by the Investigator, Supervisor, Manager/Assistant Manager, Vice President, HSET division or the People & Organizational Culture division and a member of the Occupational Health and Safety Committee.

Corrective Actions

Corrective or preventative actions are developed in response to a recommendation.

When corrective actions are developed, they must be assigned to a person, by name, not position, for completion by an identified date in eCompliance. Staff are encouraged to consider using SMART (Specific, Measurable, Achievable, Realistic and Time bound) wording to ensure the proposed action addresses the recommendation. Effectiveness criteria maybe applied to corrective actions.

In the event insufficient resources are available a request should be prepared and reviewed and approved by the Vice President of the division of the incident.

Corrective actions will be tracked and completed in eCompliance.

Communication of the Incident

Information identified and documented through management of the incident may assist others (internal and external) in preventing similar incidents from recurring.

Incidents and Investigations will be communicated through Bulletins, Safety Meetings and Occupational Health and Safety Meetings unless they contain confidentiality for the protection of the employees.

Training

Employees who are responsible for using the Incident Investigation Process shall be trained in the requirements outlined in this process and investigation techniques.

Training opportunities should focus on developing the following skills:

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- Writing
- Interviewing techniques
- Root Cause Analysis
- eCompliance

NOTIFICATIONS TO A GOVERNMENT BODY

Province	Ministry or Department	Act or Regulation	Contact
Alberta	Occupational Health and Safety	Serious Incidents or Injuries	Phone: 1-866-415-8690
British Columbia	Work Safe BC	Fatality, Serious Incident, or Unsafe Working Conditions	Phone: 1-888-621-7233
Manitoba	Occupational Health and Safety	Serious Incidents, Injuries, Fatalities, or Unsafe Work	Phone: 1-855-957-7233 Email: wshcompl@gov.mb.ca
Saskatchewan	Occupational Health and Safety Division	Dangerous Work Situation Fatality Dangerous Occurrence Serious Injury – admitted to a hospital for 72 hours or more.	Phone: 1-800-567-7233 Email: Ohs.general@gov.sk.ca

REFERENCES

- The Occupational Health and Safety Acts & Regulations, 2020
- HPL-POL-HSET-106 Good Catch, Near Miss & Incident Reporting & Investigating Policy
- HPL-POL-EX-105 Responsibility & Accountability Policy
- HPL-FOR-HSET-504 Good Catch, Near Miss & Incident Report
- HPL-FOR-HSET-505 Investigation
- HPL-FOR-HSET-503 Reportable Injury Form
- HPL-FOR-HSET-506 Employee Return to Work Plan
- HPL-FOR-EX-513 Disclosure of a Conflict of Interest Form
- HPL-POL-HR-107 Drug and Alcohol Policy