



IMPLEMENTATION

Aim

To prescribe the responsibilities and actions required for incident investigation and prevention, on University premises and/or during University related activities, to ensure the University meets the requirements of the Health, Safety and Wellbeing (HSW) Policy and the relevant sections of the [Work Health and Safety \(WHS\) Act 2012 \(SA\)](#) and [WHS Regulations 2012 \(SA\)](#).

1 Objectives

- 1.1 To have a system in which all reported [HSW incidents](#) (see definitions) have been reviewed and appropriately investigated, noting that there are different [levels of investigation](#) (see definitions) required depending on the nature of the incident.
- 1.2 To record appropriate actions in the on-line [system](#).

2 Scope

This process applies to any HSW incident where the University is in control of the activity or the workplace.

3 Process: Fact finding

Person Responsible	Actions
<p>3.1 Staff, students, title-holders, volunteers and contractors involved in the incident or working in the area where the incident investigation is being conducted</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Co-operate with the person(s) conducting the incident investigation when your input is requested.
<p>3.2 Health, Safety and Wellbeing Officers (HSWOs) in consultation with the relevant Supervisor in control of the activity/area where the incident occurred</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Lead and conduct an objective, timely and appropriately comprehensive investigation of HSW incidents in your area(s) of responsibility as directed by, or in consultation with, your line manager/supervisor (as applicable). <input type="checkbox"/> Invite the Health and Safety Representative where elected for the workgroup. <input type="checkbox"/> Assess the information and determine the incident classification: <ul style="list-style-type: none"> <input type="checkbox"/> a null incident; or <input type="checkbox"/> a student placement incident; or <input type="checkbox"/> a HSW incident. (See definitions for further information) <input type="checkbox"/> Ensure your investigation is in accordance with the HSWO Operations Manual (see definitions). <input type="checkbox"/> Determine the level of investigation (see definitions): <ul style="list-style-type: none"> <input type="checkbox"/> No further investigation <input type="checkbox"/> Review of controls <input type="checkbox"/> Full investigation <input type="checkbox"/> Record any initial action(s) taken, to make the area/activity safe, into the on-line system. <p style="text-align: right;">Continued</p>

HSW Handbook	Incident investigation	Effective Date:	31 July 2018	Version 1.1
Authorised by	Chief Operating Officer (University Operations)	Review Date:	31 July 2021	Page 1 of 7
Warning	This process is uncontrolled when printed. The current version of this document is available on the HSW Website.			

3 Process: Fact finding (Continued)

Person Responsible	Actions
<p>3.2 Health, Safety and Wellbeing Officers (HSWOs) in consultation with the relevant Supervisor in control of the activity/area where the incident occurred (Continued)</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Ensure investigation records (e.g. evidence gathered including photos, risk assessments, proficiency/training records, safe operating procedures) including notes from any incident debriefs are attached to the incident report in the on-line system. <p>Incidents relating to contractors engaged for construction work</p> <ul style="list-style-type: none"> <input type="checkbox"/> Liaise with the relevant University Contract/Project Manager from Capital Projects or Service Delivery. <p>Notifiable incident investigations In addition to the above, refer to the actions in Section 3.5</p>
<p>3.3 Supervisor in control of the activity/area where the incident occurred</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Attend the incident site to assist in the investigation where required. <input type="checkbox"/> Provide any documents requested by the HSWO as part of the investigation process. <input type="checkbox"/> Address any identified inappropriate behaviours or failure to follow safety work instructions by staff and students.
<p>3.4 Line Supervisor of the HSWO</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Ensure HSWO's are conducting timely and appropriate HSW incident investigations.

Notifiable Incident Investigation (in addition to the above)

<p>3.5 Health, Safety and Wellbeing Officers (HSWOs) in consultation with the relevant Supervisor in control of the activity/area where the incident occurred</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Ensure the investigation of a Notifiable Incident is treated as a priority. <input type="checkbox"/> Contact and take advice from the Senior HSW Advisor. <input type="checkbox"/> If safe: Attend the incident site to conduct the investigation (e.g. to take photos, identify the plant/equipment), but do not remove or interfere with the incident site (including any plant, substance, structure or thing associated with the incident) until a SafeWork SA inspector arrives at the site or directs otherwise (whichever is earlier). <input type="checkbox"/> Identify the workers who were involved in the incident and any other stakeholders (including witnesses) and note any key points from their recollections of the incident. <input type="checkbox"/> Continue to preserve the site, where instructed by SafeWork SA, (e.g. lock-out, signage and communication), until the SafeWork SA inspector directs otherwise. <p><u>Where appropriate</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Handover the lead of the investigation to the Senior HSW Advisor. <p>If an Improvement or Prohibition Notice is issued by SafeWork SA as part of their investigation</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ensure that a copy of the notice is displayed in a prominent place at/or near the workplace where the work is being carried out or that is affected by the notice. <input type="checkbox"/> Inform your line supervisor and the Senior HSW Advisor (if they are not aware). <input type="checkbox"/> Attach a copy of the notice to the incident in the on-line system.
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4 Process: Where a “[Review of controls](#)” (see definitions) is selected by the HSWO

Person Responsible		Actions
<p>4.1 Supervisor in control of the activity/area where the incident occurred</p> <p>Supported as needed by the local HSWO</p>	<p>In consultation with the worker(s) who conduct the activity:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Review the existing risk assessment. <input type="checkbox"/> Identify the control measures that failed, were not in place or were not followed. <input type="checkbox"/> Determine appropriate control measures, in accordance with the Hierarchy of Control to eliminate or minimise the risk of a recurrence (e.g. by isolating the workers from the hazard, by changing the way the work is done, documenting/revising a Safe Operating Procedure, improving the provision of information, instruction or training required, protecting the worker with Personal Protective Equipment, in order to complete the activity safely). <input type="checkbox"/> Amend the risk assessment (if required) based on the review and provide a copy to the HSWO to attach to the incident report in the on-line system. <input type="checkbox"/> Inform the HSWO of any actions that are not immediately completed for entering, by the HSWO, into the on-line system. <input type="checkbox"/> Communicate any changes to the risk assessment and control measures to all workers who conduct the activity (if required). <input type="checkbox"/> Monitor that the workers you supervise are implementing the control measures. 	
<p>4.2 Health, Safety and Wellbeing Officers (HSWOs)</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Ensure the review of control measures is in accordance with the HSWO Operations Manual (see definitions). <input type="checkbox"/> Ensure that any actions are appropriately entered into on-line system. 	

5 Process: Where a “[Full investigation](#)” (see definitions) is selected by the HSWO

Person Responsible		Actions
<p>5.1 Health, Safety and Wellbeing Officers (HSWOs)</p> <p>in consultation with the relevant Supervisor in control of the activity/area where the incident occurred</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Consider the facts gathered and identify what contributing factors led to the incident (see definitions). <input type="checkbox"/> Identify suitable corrective actions that address the factors in accordance with the Hierarchy of Control (see definitions) to prevent a recurrence. <input type="checkbox"/> Consider wider implications and take steps to check if similar problems exist elsewhere or similar incidents have happened before. (Actions may need to be broader than just in the area where the incident occurred.) <input type="checkbox"/> Consider, once the investigation has been completed who else needs to be informed. <p>(Note: Where the Full investigation identifies a “Review of controls” is required, please also follow the actions set out in Section 4.)</p>	
<p>5.2 Health, Safety and Wellbeing Officers (HSWOs)</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Complete a Safety Investigation Report which includes: <ul style="list-style-type: none"> <input type="checkbox"/> a summary of key points; <input type="checkbox"/> all the factors (causes) identified and level of risk; <input type="checkbox"/> recommended actions to address the factors. <input type="checkbox"/> Forward a copy of the report to the Head of School/Branch and Executive (for a notifiable incident). <input type="checkbox"/> Seek approval for the recommended investigation actions (if unsure of who to gain approval from, consult your line manager or supervisor). 	

6 Process: Actions arising from a “Full investigation”

Person Responsible		Actions
6.1	Health, Safety and Wellbeing Officers (HSWOs) in consultation with your line Supervisor	<ul style="list-style-type: none"> <input type="checkbox"/> Enter and assign the agreed corrective action(s) required in the on-line system. <input type="checkbox"/> Monitor corrective actions until completion.
6.2	Supervisor in control of the activity/area where the incident occurred	<ul style="list-style-type: none"> <input type="checkbox"/> Undertake any corrective actions assigned during the investigation in consultation with staff/students who undertake the activity/work in the area. <input type="checkbox"/> Ensure corrective actions are attended to within the specified timeframes to prevent a recurrence.

7 Process: For an [Improvement Notice or Prohibition Notice](#) (see definitions)

Person Responsible		Actions
7.1	Supervisor in control of the activity/area where the incident occurred Supported as needed by the local HSWO	If a Prohibition Notice or Improvement Notice is issued by SafeWork SA as part of their investigation <ul style="list-style-type: none"> <input type="checkbox"/> Take advice from the Senior HSW Advisor. <input type="checkbox"/> Ensure the completion of action(s), as directed by the SafeWork SA inspector, to remedy the contravention before the specified date on the notice. <input type="checkbox"/> Ensure the notice is signed by the person who was issued the notice and returned to the SafeWork SA inspector to certify that the requirements of the notice have been complied with, before the specified date on the notice. <input type="checkbox"/> Ensure that a copy of the signed notice is provided to the HSWO for attaching to the incident in the on-line system.
7.2	HSWO	<ul style="list-style-type: none"> <input type="checkbox"/> Ensure that completed actions and a copy of the signed notice are entered and attached in the on-line system.
7.3	Associate Director, HSW (or delegate)	<ul style="list-style-type: none"> <input type="checkbox"/> Provide SafeWork SA with any investigation documents requested and if applicable, any signed and completed Prohibition/Improvement notices. <input type="checkbox"/> Maintain a Notifiable Incident records management file which includes a copy of all investigation documents.

8 Performance Measures

Human Resources will use performance measures to assist in identifying areas of success and/or where corrective action is required to meet the objectives and targets of this process. The level of compliance with the chapter and effectiveness will be determined during the internal audit process.

9 Definitions

Control measure, in relation to a risk to health and safety,
Means a measure to eliminate or minimise the risk.

Factors (which contributed to the incident)

- Failure of a process to provide information, instruction and training
- Inappropriate conduct or behaviour
- Failure to appropriately supervise
- Failure to appropriately manage/control contractors
- Failure to effectively control a hazard
- Poor housekeeping
- Failure to follow safe work procedures
- Failure to report incidents
- Plant/Equipment/Material not fit for purpose
- Failure to appropriately maintain plant/equipment
- Infrastructure/facilities not fit for the activity being undertaken
- Failure to identify a hazard
- Failure to appropriately assess a hazard (conduct an effective risk assessment).

Hierarchy of control measures [WHS Regulations 2012 (SA) Section 36]

This regulation applies if it is not reasonably practicable to eliminate the risk to health and safety.

The University must minimise risks, so far as is reasonably practicable, by doing 1 or more of the following:

- (a) substituting (wholly or partly) the hazard giving rise to the risk with something that gives rise to a lesser risk;
- (b) isolating the hazard from any person exposed to it (e.g. erecting barriers, relocating the activity);
- (c) implementing engineering controls (e.g. a control that is physical in nature, including a mechanical device/process.)

If a risk then remains - the University must minimise the remaining risk, so far as is reasonably practicable, by implementing administrative controls (e.g. a method of work, a [safe operating procedure](#), [provision of information/instruction/training](#)).

If a risk then remains - the University must minimise the remaining risk, so far as is reasonably practicable, by ensuring the provision and use of suitable [personal protective equipment](#).

A combination of the controls set out may be used to minimise risks so far as is reasonably practicable if a single control is not sufficient for the purpose.

HSW Incident

A HSW incident is a safety notification (hazard, near miss, injury/illness) that occurs in an area or location that the University controls or owns, or is an activity that the University directly controls (such as a field activity). It can be an incident involving staff, volunteers, students, members of the public or contractors.

HSW Officer Operations Manual

An internal restricted on-line manual for professional Health, Safety and Wellbeing Officers, to assist them in their role and provide operational processes and guidance.

Improvement and Prohibition Notices (issued by SafeWork SA)

- Improvement notices – are written directions requiring a person to fix an issue within a specified time. The inspector will include information on the notice about what must be done to comply with the WHS legislation. The person who receives the notice is responsible for achieving compliance with legislation or dealing with the immediate risk.
- Prohibition notices – are written directions prohibiting any activity that will, or is likely to, involve an immediate risk to the health and safety of any individual. If a prohibition notice has been issued, the prohibited activity cannot recommence until an inspector certifies in writing that the risk has been remedied.

HSW Handbook	Incident investigation	Effective Date:	31 July 2018	Version 1.1
Authorised by	Chief Operating Officer	Review Date:	31 July 2021	Page 5 of 7
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9 Definitions (Continued)

Incident classification (on-line system)

Null Incident

A Null Incident is a report which fits into one of the following:

- duplicate of another incident;
- a maintenance issue that does not otherwise constitute a safety issue;
- a waste management issue that does not otherwise constitute a safety issue; or
- a joke entry/prank/hoax.

Student Placement Incident

A student placement incident is a safety notification (hazard, near miss, injury/illness) that occurs in a placement area outside of the University’s control (e.g. placement in a non-University hospital or vet surgery). Where a student placement is into our own research programs it is not a student placement incident.

HSW Incident

A HSW incident is a safety notification (hazard, near miss, injury/illness) that occurs in an area or location that the University controls or owns, or is an activity that the University directly controls (such as a field activity). It can be an incident involving staff, volunteers, students, members of the public or contractors.

Levels of Incident investigation

No Further Investigation

Use this where a full investigation is not warranted and there is no need for a review of controls.

- The incident and required actions are simple and straight forward.
- There are no questions that remain unanswered.
- There are no key underlying factors or no value to be derived from recording them.
- There is no need for a written report to the Head of School.

Review of Controls

Use this where a full investigation is not warranted but there is a risk assessment that needs review.

- There is a risk assessment.
- Evidence gathered during reporting indicates that injury or near miss occurred despite following the controls.
- Despite following the controls there was an injury or near miss.

Full Investigation

- There are questions needed to determine if there are key underlying factors that constitute root causes.
- Evidence gathered during reporting indicates there are system failures that need analysis (e.g. someone not trained who should have been).
- Evidence gathered during reporting indicates there are failures by workers to do something they ought to have done (e.g. lack of hazard management where required).
- There is a need for a written report for the Head of School.

Near Miss

An unplanned event that did not result in injury, illness or damage but had the potential to do so. Only a fortunate break in the chain of events prevented an injury or damage.

A near miss includes a Hazard Notification whereby an uncontrolled hazardous situation is identified prior to the involvement of any worker (e.g. Ceiling tiles hanging loose or an electricity failure due to a faulty toaster).

HSW Handbook	Incident investigation	Effective Date:	31 July 2018	Version 1.1
Authorised by	Chief Operating Officer	Review Date:	31 July 2021	Page 6 of 7
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10 Useful information and resources

10.1	University related documents and Policies University HSW Handbook: Corrective Actions Hazard Management HSW Policy Incident Reporting
10.2	Related Legislation Work Health and Safety Act 2012 (SA) WHS Regulations 2012 (SA)
10.3	Useful Web-links SafeWork Work SA University's on-line system