

**1. PURPOSE AND SCOPE**

To address and manage HSE incidents and HSE nonconformities including reporting, investigation and taking corrective action.

**2. APPLICABILITY**

This procedure applies to Sterling & Wilson Projects and Operation & Maintenance.

**3. DEFINITION**

- **Incident:** It is an occurrence arising out of, or during, work that could or does result in injury and ill health. An incident where injury and ill health occurs is sometimes referred to as an accident.
- **Near Miss:** An incident where no injury and ill health occurs, but has the potential to do so, may be referred to as a near-miss. A near miss that may have resulted in LTI, or any serious injuries is referred to as a Potential near miss.
- **Emergency:** It is a particular type of incident Injury and ill health are adverse effects on the physical, mental, or cognitive condition of a person
- **First aid cases:** Any one-time treatment, and any follow-up visit for the purpose of observation of minor scratches, cuts, burns, splinters, or other minor industrial injury, which does not ordinarily require medical care
- **Medical treatment Case:** Work-related injury or illness requiring medical care or treatment beyond first aid (regardless of the provider of such treatment) that does not result in a Restricted Work/Transfer Case (RWTC) or Lost Time Incident (LTI).
- **Lost time accident:** It is something that results in a temporary disability or time lost from work. It could be as little as one day.
- **Significant Incident:** Incidents which may have the potential to cause severe impact on HSE, decided by Business HSE based on past organizational experience.
- **Site hazard observation:** Observations of behaviour & work practice and analysis of underlying causes of unsafe acts & conditions.
- **Unsafe Condition:** A condition in the workplace that is likely to cause a Potential near miss or incident.
- **Unsafe Act:** Performance of a task or activity that is conducted in a manner that may threaten the health and/or safety of workmen.
- **Worked hours:** Daily hours that an employee is engaged in the project and operations activities.
- **Man-days lost:** Total number of workdays loss caused by work-related accidents during the reporting period. Includes all days the worker was scheduled to work (if Sundays and holidays are scheduled as workdays, the same must be counted as lost days).
- **Non-conformity:** It is a significant deficiency (either a single or number of similar observations) from
  - Requirements of ISO 14001 & 45001
  - Onsite implementation, practices

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- Relevant procedures, legal requirements, work instructions, practices
  - HSE management system requirements

The significant deficiency will possess a serious threat to the safety of personnel and result in the HSE management system collapse, if not addressed immediately through root cause analysis and corrective actions.

- **Observations:** These are random lapses in the implementation of standard requirements/ operational controls/monitoring systems/non-availability of documents & records. These are recorded in a tracker, corrected by immediate actions and there is no need for a detailed root cause analysis.
- **Corrective action:** Action to eliminate the cause of a non-conformity and to prevent recurrence.

**4. RESPONSIBILITIES**

- All employees are responsible for reporting the near miss & incidents
- HR / Admin is responsible for arranging treatment for the injured
- Site HSE, project manager is responsible for reporting near misses and incidents on site in the online HSE portal.
- Business HSE, Site HSE and PM, Subcontractor supervisor / Workmen & HR/ Admin are responsible for investigating the near miss & incidents and follow-up for the completion of actions fixed to avoid recurrence.

**5. DESCRIPTION OF PROCEDURE:**

**5.1 Incident Reporting and Management**

Input	Process	Output	Responsibility
Occurrence of an incident			Worker / Engineer / In-charge / Site HSE/PM
	In the occurrence of an incident (including a near miss), the witness informs to immediate supervisor and in turn the concerned HSE person.		
	<ol style="list-style-type: none"> <li>1. Look for medical assistance as required.</li> <li>2. Report the incident in the online HSE portal within 24 hours.</li> <li>3. While reporting, classify the incident by Near-miss, First aid case, medical treatment case, Restricted work case, Loss time injury, Fatal, Fire incident, Property damage/dangerous occurrence, Environmental incident, and Vehicle incident.</li> </ol>	Incident notification will be sent to all concerned as defined in the roles on the Online HSE Portal.	

**5.2 Incident Investigation:**

If a significant incident / Lost time incident is reported, the incident investigation shall be carried out to understand the underlying causes and identify the root causes of that incident. The following incident scenarios may require incident investigation followed by incident reporting:

- Potential Near miss,
- Medical treatment case,
- Restricted work case,
- Loss of time injury,
- Fatal,
- Fire incident,
- Property damage/dangerous occurrence,
- Environmental incident,
- Vehicle incident.

Input	Process	Output	Responsibility
	Verify the incident notification for an incident category, change the incident category as required and initiate the investigation as decided		Business HSE
Incident report	On receiving the notification, an investigating team will be selected comprising of concerned staff/engineers/workers, the HSE person and other subject matter experts, as required.	Investigation team	Respective Business HSE Head
	Select the Investigation Team Leader and assign the investigation responsibilities accordingly through the online HSE portal.	Investigation team leader and email intimations	Respective Business HSE Head
The following evidence will be checked for investigation: - witness statement - location/incident spot - environmental conditions - photographs - equipment/tools/machinery involved - medical documents - competency and training records - CCTV footage, if available	Site visit and Incident investigation	Evidence collection, analysis, and reporting	Investigation team
	Select the contributory factors (Man, machine, material, Method, Management & Environment) based on the collected evidence		Investigation team
	For each contributory factor minimum 3 why--why analysis needs to perform to arrive at the root cause		Investigation team
	Report to be uploaded on the online HSE portal	Root cause(s)	Investigation team

	Corrective action to be generated based on the root cause identified	Corrective action statements, notification to the process owner for on-time closure action and “Lesson Learnt” for circulation.	Investigation team  Action item Owner
<b>Case Management (In case of Injury/illness)</b>			
Incident report	Verify the incident report against the laid down parameters and do the necessary changes as required.  Save and close the case after ensuring the lesson learnt is communicated and verification of corrective action is done.	Closure in Incident Tracker	Business HSE

**5.3 Nonconformity and Corrective Action**

<b>Input</b>	<b>Process</b>	<b>Output</b>	<b>Responsibility</b>
Non-fulfilment of the requirement identified through <ul style="list-style-type: none"> <li>- audits and inspections</li> <li>- incident investigation outcome</li> <li>- hazard observation analysis</li> <li>- compliance evaluation and other requirements</li> <li>- deviations from HSE and other management policies and</li> <li>- Other related protocols</li> </ul>			
	The deviations recorded through the online HSE portal are categorised as <ul style="list-style-type: none"> <li>- Observations</li> <li>- Compliant</li> <li>- Partially complaint</li> <li>- Non-complaint (NC)</li> </ul>	Action item generation in the calendar module in the Online HSE portal	Site HSE / PM/ Internal Auditor

	- Not applicable		
	Appropriate corrective action would be taken after reviewing the root cause, in the case of the Non-complaint category.  For observations and partially compliant categories required corrective actions would be taken as recommended.	Closure Action item Report	Site HSE / PM / Auditee
	Required corrective actions would be reviewed in accordance with the hierarchy of controls and actions would be taken accordingly.	Closure Action item Report	Site HSE / PM / Auditee / Business HSE
	Any revision required in the OHS risk assessment and/or environmental impacts study, if suggested as a closure action, would follow the MOC procedure.  Other HSE MS procedures would be revised as required	Revised register  Revised HSE MS	HIRA/AIA  Site HSE / PM MA/ BusinessHSE
	The effectiveness of the closure action would be verified	Verification and closure report	Internal Auditor / PM/ Site HSE/ Business HSE
	In case of delays in the closure of action items, notification thru emails will be escalated at set intervals.	Email notification	Online HSE portal

**6. FORMATS APPLICABLE:**

Sr. No.	Format No.	Title
1	SW/HSE/F433	Near Miss & incident report format
2	SW/HSE/F439	Accident and Investigation reporting format
3	Email/ Online HSE Portal	Lesson Learnt
4	SW/HSE/F444	Monthly HSE Report

