Incident Management

Policies & Procedures: Safety and Sanitation

POLICY/APPROACH:

Please refer to the Safety Policy.

Immediate care for any injured person always takes precedence over all other incident management actions. As soon as first-aid or other medical needs are met, the Site Manager shall be notified of any incident, no matter how slight the injury, illness or damage. All incidents shall be investigated. Internal recording and reporting to all entities with a need to know shall be completed within required timeframes. Data derived from the incident investigation, follow-up, monitoring and lessons learned shall be applied and communicated as part of a continual improvement process to foster prevention of recurrence of similar future incidents and maintain a safe and healthy workplace.

HEAD START PROGRAM PERFORMANCE STANDARDS:
45 CFR part 1302.47 Safety Practices

OREGON CHILD CARE DIVISION:
414-300-0170 Hazards and Emergencies

OREGON OSHA:
437-002-0161 Medical and first Aid

PROCEDURES:

The following procedure establishes and documents the process for managing agency post-incident activities to ensure compliance, completeness and consistency of implementation.

Scope

The scope includes initial notifications, completing an investigation, recording relevant information, reporting information to appropriate entities in accordance with internal and external regulatory requirements and continual improvement actions. It encompasses occupational (work related) incidents for employees and all children, parents and others served by the agency.
Other agency Health and Nutrition procedures exist that address specific needs in the childcare realm that may require additional documentation and database entries (SHINE).

School transportation incidents are governed by Oregon Department of Education regulations and some additional actions/forms are required.

Additional processes and forms are required from Human Resources for incidents that result in lost-work days, medical attention or compensation claims. The forms are available on the agency website under Safety & Sanitation.

This document does not encompass emergencies or disasters addressed in the agency Emergency Disaster Plan (large-scale man-made or natural disasters, homeland security threats or local security incidents).

**Applicability**

This procedure applies to all appropriate agency organizations and staff in all locations.

**Definitions**

*Emergency* – for the purposes of this procedure, emergency relates to a personal injury or illness involving serious harm or that is potentially life-threatening, requiring immediate medical attention.

*Incident* - an unplanned, undesired event that disrupts normal conduct of operations and may result in personal injury. This definition encompasses accident, injury, illness, blood-borne pathogen exposure, and near-miss categories. This document does not encompass emergencies or disasters addressed in the agency Emergency Operations Plan.

*Accident* - A sudden, unexpected event identified as to time and place; an undesired event that results in personal injury or property damage.

*Injury* – harm that is sustained from an incident.

*Near-miss* - an incident where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage/injury easily could have occurred. A narrowly avoided mishap.

*Investigation* - the process used to gather information about an incident, analyze it, draw conclusions and make recommendations.

*Notification* – informing the people who need to know that an incident has occurred as soon as practicable after occurrence, usually verbally, by email or texting.

*Recording* – all written documentation of an incident, including email.

*Reporting* – providing a report to internal or regulatory officials.
Roles and Responsibilities

Agency senior management at the Director level has the responsibility to support and promote this policy and to ensure resources are provided to implement and operate the procedures formalized in this document.

All agency staff has the responsibility to understand and implement this policy and procedure whenever an incident occurs that involves them.

Site Managers have overall management responsibilities for all incidents occurring within their assigned centers. The on-site supervisor at the time of an incident should preside over the investigation and analysis of the incident. Center Safety representatives have OSHA training in incident investigation and should participate in all incident investigations at their center and report to the Safety Committee. If at all possible, the Safety Representative should help complete the Incident Investigation reports.

The Maintenance Manager has responsibility for managing all incidents involving maintenance staff.

The Health and Nutrition Services Director has the role to interface with the Oregon Child Care Division (CCD) and report incidents involving children.

The Human Resources (HR) Manager has the role to interface with the agency insurance carrier and OSHA for compensation claims and reportable incidents; and to coordinate appropriate staff training.

The Business Services Manager has the responsibility to address the special requirements and forms associated with a bus incident.

The Safety Compliance Manager has the responsibility to oversee the performance of these procedures, and to provide guidance/assistance to all involved.

The Safety Committee has the responsibility to review each incident and make additional recommendations for corrective actions and continual improvement if necessary.

Notifications and Reporting

All initial incident notifications shall be made within 24 hours. If an incident is an emergency, attending staff shall immediately call 911 to receive medical assistance, and stand by until assistance arrives. If additional staff is present or available, they can begin notifications, or notifications will be made after emergency assistance has arrived.

As soon after an incident is initially observed and attended to, the attending staff member shall notify their immediate supervisor. If the supervisor is not available, the attending supervisor shall be notified. The supervisor shall immediately notify the HR Manager. The HR Manager will notify the Operations Director and the Safety Compliance Manager, if necessary. Telephone or email notifications are acceptable.

If a child is involved parents must be notified on the day of occurrence.
An incident resulting in the death of a child must be reported to the CCD within 24 hours.

Any animal bites to a child must be reported to the CCD within 48 hours of occurrence.

Injuries to a child which require medical attention from a licensed health care professional must be reported to the CCD within five days. Report these injuries to the Health and Nutrition Services Director as soon as possible. In addition, a copy of the medical record and whether the child is insured shall be provided to the agency Operations Director.

The final report is completed by the lead investigator. It can consist of the completed incident Investigation form.

The final report is issued to the HR Manager for presentation to the Safety Committee for review.

On the job worker fatalities and catastrophes must be reported to Oregon OSHA within eight hours.

Any employee accident that results in overnight hospitalization must be reported to Oregon OSHA within 24 hours.

**Recording Incident Information**

The Major Incident and Near Miss Investigation Report shall be used for documentation of all incident related information. The completed form is the incident report and is found online in the Staff Zone.

The Minor Incident Report shall be used for documentation of minor injuries that don’t require medical attention or compensation claims.

The Ouch report form shall be used whenever there is a child-involved incident.

A SAIF Corporation form 801 must be completed and submitted to the HR Manager if the employee wishes to initiate the compensation claim process.

**Incident Investigation and Analysis**

All incidents including near-misses should be analyzed. The resources applied to an incident investigation should be proportional to its severity. This means analysis of a near-miss may not be as extensive as an injury requiring medical attention. However, the steps of the process to determine root and contributing causes and potential corrective actions remains the same. The Major Incident and Near Miss Investigation Report is crafted to walk the investigator through the investigation process. The Safety and Compliance Manager interviews the injured employee involved in a Major Incident and submits the interview report to the HR Coordinator.

The object of every investigation is to prevent it from happening again. Incident investigation is not about placing blame, but about finding facts.
The primary investigation outline is:

- Gathering useful information
  1. Secure the scene.
  2. Collect facts about what happened – conduct interviews.

- Analyzing the facts of the event
  1. Develop the sequence of events – use the five “Whys?” process
  2. Determine the causes (see the diagram below)
     Steps in cause analysis
     - Analyze the injury event to identify and describe the direct cause of injury.
     - Analyze events occurring just prior to the injury event to identify those conditions and behaviors that caused the injury (primary surface causes) for the accident.
     - Analyze conditions and behaviors to determine other specific conditions and behaviors (contributing surface causes) that contributed to the accident.
     - Analyze each contributing condition and behavior to determine if weaknesses in carrying out safety policies, programs, plan, processes, procedures and practices (inadequate implementation) exist.
     - Determine implementation issues to identify system, process or procedure weaknesses.

- Implementing solutions to prevent recurrence
  1. Recommend improvements.
  2. Complete and submit the report.
Training

All safety committee representatives must receive hazard identification and incident investigation training.