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DOCUMENT TITLE

**H.S.E.
INCIDENT & NEAR MISS PROCEDURES**

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All incidents and near misses need to be reported and investigated to ensure that relevant lessons are learnt and the appropriate actions taken to prevent recurrence. This procedure details the requirements for incident investigation and reporting. It requires all incidents involving fatalities, major injury/illness, including any to members of the public affected by our activities, damage to equipment or the environment, or security events to be reported promptly, through the management chain.

The reporting requirements outlined in this procedure are additional to any actions that may be required under the Government statutory reporting requirements.

2.0 Scope

This incident investigation and reporting procedure is applicable to all incidents and near misses, which involve: -

- ALASALA CO. employees engaged in company business activities, including traveling to or from their place of work or between different work locations.
- facilities operated and managed by or on behalf of ALASALA CO. such as vehicles & projects units;
- ALASALA CO. contractors engaged in company business activities.
- ALASALA CO. assets.

3.0 Purpose

The purpose of this procedure is to provide a general framework that can be used by ALASALA CO. to:

- comply with Government Statutory requirements;
- provide guidance on investigation and reporting of incidents, including near misses.

4.0 Definitions

The following definitions have been provided:-

- a) **Incident:** An unplanned event that could be either an accident or a near miss.
- b) **Accident:** An incident that has given a loss within the following areas: Personal Injuries, Spills, Fires, and Equipment Damage.
- c) **Near Miss:** An unplanned incident that under slightly different circumstances could have led to an accident.
- d) **Asset:** This includes ALASALA CO. employees, premises, plant or equipment.
- e) **Serious Occurrences:** A High Loss accident or a High Potential loss Near Miss.
- f) **Immediate Cause:** Is the reason why an incident has occurred. Immediate causes can be divided into two categories, Personal and Job related causes. These causes are normally found by checking: Physical equipment, procedures, incident location.
- g) **Root Cause:** Normally identified by asking “WHY” to all immediate causes.
- h) **Environment:** Surroundings like Air, Water, Soil and conditions in which an organization operates, or which it may affect, including all living systems, human or other.
- i) **Environmental Effect:** The direct, or indirect effect, of an organizations activity, products or services onto the environment.
- j) **Hazard:** A situation with the potential to cause harm to people, environment or property.
- k) **Ill Health:** Acute or chronic ill health caused by physical, chemical or biological agents; as well as adverse effects on mental health.

l) **Investigation Team:** Assigned people with different, but relevant work backgrounds, and a



leader, who investigates and analyses the causes, of an incident, and make recommendations on actions to be taken to prevent recurrence.

- m) **Job Factor:** Causes under Management's Control.
- n) **Personal Factor:** Causes under the employee's control.
- o) **Lost Time Injury (LTI):** Any work-related injury that leads to the absence from work for three or more days (not including the day of the incident).
- p) **Major Injury Cases:** Any personal injury that involves:-
 - i) any fracture, other than to fingers, thumbs or toes.
 - ii) any amputation
 - .iii) loss of sight, (whether temporary or permanent), a penetrating eye injury, chemical or hot metal burn to the eye.
 - iv) any injury resulting from an electric shock or electrical burns, causing a loss of consciousness and/or requiring immediate medical treatment.
 - v) loss of consciousness from lack of oxygen or by exposure to harmful biological agents or harmful substances.) any other injury requiring medical treatment in a hospital for more than 24 hours, or requiring resuscitation, or leading to hypothermia, heat induced illness, or unconsciousness.
 - vii) acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to a biological agent or its toxins or infected material.
 - viii) absorption of any substance by inhalation, ingestion or through the skin leading to acute illness or loss of consciousness.
- q) **Medical Treatment Injuries:** The number of incidents resulting in work related injury(ies) or illness(es) requiring medical treatment (more than first aid) from a professional physician or qualified medical person and where there are no days lost from after the incident (or would not be any days lost time from the day after the incident if this is a non-working day).
- r) **First Aid Injury:** The injury which only require treatment from a Professional Nurse and lead to no Lost Time from work.
- s) **Occupational Diseases:** Includes any of the following:-
 - i) poisoning by substances used at work.
 - ii) skin diseases, lung diseases, asbestosis, food poisoning etc.
- t) **Risk:** The probability of an unspecified event occurring within a specified period or within specified circumstances. It is a definition of 'how bad' an incident is, and 'how often' an incident will occur. A qualitative risk assessment is often made after an incident or near miss to help establish follow-up recommendations.
- u) **Road Traffic Incident:** Is an incident which involves a road traffic vehicle which:-occurs on ALASALA CO. facilities; involves ALASALA CO. owned vehicle or direct hire vehicle; involves ALASALA CO. employees or contractors involved in company activities.
- v) **Work Related Incident:** Any incident, illness, disease, dangerous occurrence or near miss which involves:-
 - i) ALASALA CO. employees at work, this includes travel to and from their place of work.
 - ii) ALASALA CO. assets;
 - iii) any other person on ALASALA CO. facilities - including any member of the public.



5.1 Incident Occurrence

When an incident or near miss occurs, all ALASALA CO. employees, associated companies' employees, contractors and their employees, are obliged to:-

- a) notify all incidents and near misses to their line manager or Company Representative (CR) in the first instance.
- b) co-operate fully with incident investigators in identifying the causes of the incident.

Line Management must report all incidents or to the Project Sector Manager and Duty Safety Officer by Telephone or Radio, as soon as practicable, this includes incidents and near misses occurring out-of-hours. Failure to report incidents, including near misses, is a serious breach of ALASALA CO. policy.

5.2 Incident Categories

Incidents are categorized according to the severity of their effect on personnel, environment, assets and equipment, and the reputation of ALASALA CO.. Therefore, Risk Level Low, Medium and High shall be used in this respect. This could be deduced from the *"Potential Loss Matrix & Risk Factors"*,

5.3 High Potential Near Miss

To be considered high potential to cause a "High" Risk Level, will be considered High Potential and must be investigated accordingly.

The investigation should be led by a senior person onsite to reflect the seriousness by which these events are taken.

Examples of high potential Incidents are:-

- a) Release of noxious material - potential to cause fatalities over a short time period or cause irreversible damage, serious disability and fatalities e.g. toxic material, corrosives, known carcinogens.
- b) Dangerous occurrence - failure or collapse of lifting machinery, scaffolding etc. Explosion or fire release, chemical spills and releases other than hydrocarbons,. Atmospheric releases, Odorant, CFC or Halon.

5.4 Link with the Safety Awareness Programme

The Safety Awareness Program provides a framework for reporting near misses and making safety and environment related suggestions.

Reporting near misses through the Safety Awareness Program should not replace using this procedure for high potential near misses. Any high potential near miss must be reported using Safety Awareness Program forms to the supervisor who will relay it to the HSE Manager.



5.5 Starting the Investigation

Following an incident, apart from making the site safe, anything connected with the incident must not be altered. The Project Manager, the Duty Safety Officer and the Client Reps. shall be advised immediately, regardless of time-of-day or incident scene location. Delaying or failing to report an incident is considered to be a serious breach of company HSE Policy. An Initial Serious Occurrence Report shall be sent for all incidents given Risk Level **"HIGH"**.

An initial assessment of the incident by the HSE Department representative will be used to prepare a structured plan for the full investigation. During this stage the information collected will include initial information from the incident report form, and the events leading up to the incident.

Following initial H.S.E assessment, the Project HSE Manager shall determine the appropriate incident Risk Level. The scale of the incident will determine the level of the investigation. As a general rule, **a Risk Level "H"** incident investigation teams will be led by the Corporate HSE General Manager from the Head Office. This includes all incidents involving fatalities, serious injury, or significant damage to the environment or assets.

On behalf of the ALASALA CO. General Manager, the Project HSE Manager shall ensure that the level and depth of investigations for Category Risk Level **M & L** incidents, is commensurate to the severity, or potential severity, of the incident. HSE Manager is responsible for categorising all incidents.

The Project HSE Manager will investigate category Risk Level "M".

Category Risk Level "L" will be investigated by the department involved in the incident and supported by Project HSE Department personnel if required.

All incidents investigations must be conducted in a positive manner designed to encourage open reporting of all aspects of the incident without fear of victimization or retribution.

5.6 Regulatory Authority Notification

Egypt has legislative requirement to report incidents to the government's regulatory authorities. For incidents that cause fatalities, major injuries or environmental damage, Egypt's regulatory organization may conduct their own investigations. Such external investigations will be in addition to ALASALA CO.'s own internal investigation.

The HSE Department must ensure that the appropriate reports/forms are completed, sent to the relevant authority or agency, and a copy is retained on file. The HSE Department is responsible for reporting environmental type incidents to the government agency.

5.7 Incident Investigation Methodology

During the investigation there shall be a full evaluation of the incident, considering all contributing factors and causal events. In simple cases the incident investigation report shall identify how the incident occurred and may provide sufficient information to explain why. More complex incidents will need more complex techniques to identify why the incident occurred.

Investigation techniques shall be used to evaluate the incident in a structured manner, to determine all the factors and causal events that contributed to the incident. As a minimum, the Root Cause Analysis Section in the Incident Report Form, shall be used in all cases to identify incident root cause(s). Applying this information to determine the root cause to determine WHY the incident happened. Systematically working through the evaluation techniques will provide the answers to the HOW and WHAT aspects of the incident.



The analysis must be based only on the evidence that has been discovered, free of subjective opinion and bias. The follow-up recommendations must be achievable and address the root causes of the incident.

5.8 Incident Loss Costing

The cost of the incident is the unplanned expenditure, or losses, that have arisen as a result of the incident. These losses can be categorized as follows:-

- a) Direct Cost - Costs incurred due to an incident that are covered by insurance policies. Into this category falls:-
 - i) cost of injuries sustained - include cost of medical support and evacuation;
 - ii) cost of plant, equipment or property damaged - include cost of production lost and environmental clean up costs.
 - iii) cost of investigation - Include transport costs of the investigation team.
- b) Indirect Cost - Costs incurred due to an incident, or caused by damage to reputation that are not covered by insurance policies. Into this category falls.
 - i) increased employer's liability - include cost of increases in insurance.
 - ii) legal actions - include cost of fines imposed, legal representatives fees and any compensation costs.
 - iii) changes in practices - *include cost arising from procedural changes imposed by prosecution or other enforcement action.*
 - iv) changes to training - *include any cost of new training equipment or training material.*
 - v) intangible costs associated with adverse media publicity.
- c) Potential Cost - These are the potential losses that could have been sustained if a 'High Potential Near-Miss' had been translated into an actual incident. The estimated costs can be either direct or indirect. As actual expenditure can be incurred as a result of a near-miss investigation and the cost incurred if remedial action has to be taken to avoid recurrence.
- d) Cost Analysis - This should be carried out to establish the difference between actual cost of the investigation including the cost of improvements against actual (direct or indirect) costs or potential cost if the 'Near-Miss' had been translated into an actual accident

5.9 Recommendations and Follow Up

When writing up the report with recommended actions, observe the following points:-

- a) The report should be as short as practical to achieve its purpose. The report must be accurate, honest and fair to all involved. The task of the Investigation Team is not to allocate blame, although inevitably there may be some indications of this;
- b) Reports are 'discoverable', meaning that they can be used by the various parties involved in actions for damages or criminal charges;
- c) the recommendations must address corrective actions to all the causes of the incident. The purpose of the recommendations is to prevent recurrence of the incident, or of similar incidents;



- d) the recommendations need to be specific, achievable and the time frames for actions practical. The recommendations must be prioritized, and will action relevant parties to implement them. The prioritizing should be reflected in the Target Date.

5.10 Recommendation Tracking Register

All actions including those involving the instigation of a project over a significant time scale will be entered into the *Action Tracking Register*. This is to ensure that the action is tracked through to completion.

Appendix A: Guidelines for Completing the ALASALA CO. Incident Report Form

A.1 Introduction

The Incident Report Form shall be completed for all Category of incidents including, minor injury cases (First Aid).

A.2 Completing the Incident Report Form

The report form shall follow the following sequence:-

- Step 1** The Initiator or relevant Supervisor completes section 1 to 3 on the report form.
- Step 2** The relevant Supervisor initiates investigation and completes section 4 to 6 on the report form.
- Step 3** Department Manager reviews sections 1 to 6 and completes sections 10 on the report form.
- Step 4** HSE Manager reviews sections 1 to 11 and completes section 7&8 and 10 in consultation with the dept. Mgr. on the report form.
- Step 5** Project Sector Manager reviews sections 1 to 11 and completes section 12 on the report form and returns the form to the HSE Manager. (*the reports given Potential Risk Factor 4 or 5*).
- Step 6** The HSE Manager shall ensure that all relevant information relating to the incident is disseminated. Copies of the completed report forms are sent to the location manager and supervisor.



Section 1 to 3.

Shall be completed by the Initiator and or the relevant Supervisor/Manager.

1. General Information - this include details relating to the:-
 - a) Location – Project/Construction Site, Workshop, Office etc.
 - b) Date - when the incident occurred.
 - c) Time - when the incident occurred.
 2. Description of event/Details of Incident - what happened.
 3. Indicate what immediate actions taken to prevent recurrence.
 4. The Initiator's / Supervisor's Name, his Job Title and Signature.
- d) the recommendations need to be specific, achievable and the time frames for actions practical. The recommendations must be prioritized, and will action relevant parties to implement them. The prioritizing should be reflected in the Target Date.

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2. Description of event/Details of Incident - what happened.
3. Indicate what immediate actions taken to prevent recurrence.
4. The Initiator's / Supervisor's Name, his Job Title and Signature.

The relevant Supervisor initiates investigation and completes section 4 to 6 on the report form.

5. Type of Activity - this relates to the type of activity being performed at the time of the incident.
6. To identify the Immediate cause of incident and whether it is Job or Personal Related.
7. Root Cause of Incident - the root cause analysis section shall be used to Establish the root cause(s).

Section 7, 8 &11.

Shall be completed by the HSE Manager.

8. Shall review Sections 1 to 6, evaluate/ analyze all the Relevant information, conduct Risk Assessment and fill in the appropriate and relevant information under the Potential Loss Matrix, this includes: -
 - a) Personal injury;
 - b) Discharge to the environment - oil, gas or chemical;
 - c) Material damage
9. Shall establish the Damage Extent, this includes Approximate cost, (L.E.), Asset damage.

Section 9&10.

Shall be completed by the Department Manager.

10. Corrective Action, this includes:-
 - a) description of action taken or proposed.
 - b) the person responsible for carrying out the task.
 - c) the target date or completion date if known.
 11. Comments - additional details relevant to the incident.
 12. This Section shall be completed by the HSE Manager in order to ensure that all associated incident actions have been addressed.
 13. This Section shall be completed by the Project Manager. (to reports given Potential Risk Factor 4 or 5).
- Comments - additional details relevant to the incident.

N.B.

1. When the report is completed by all concerned parties, the HSE Manager shall enter all the recommendations/remedial actions into the Action Tracking Register for monitoring follow up, implementation and close out of it.
2. Also, he shall retain the Original report form and distribute copies to the Department Manager concerned and the Project Manager.



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INCIDENT/ NEAR MISS REPORT

Location: Date:

Reported by (optional):

Describe the incident/ Near Miss/Situation

.....
.....

Originator's Estimate of risk potential

Circle	1	2	3	4	5
	Minimal		Moderate		Serious

Originator's suggested corrective measures

.....
.....

Supervisor's comments

.....
.....

Name and title Date:

Resolution

.....
.....

Name and title Date:

	Prepared by	Reviewed by	Authorized by	Approved by
Job Title				
Signature				
Date				



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INCIDENT INVESTIGATION REPORT

A. Injured person & Injury Details:

Name..... Occupation..... No.....
 Date:..... Time..... Location:.....
 Part of Body Injured..... Nature of Injury: Minor/Lost Time
 Description of Injury:.....

B. Accident Details:

Brief description of Accident:

Damage/ Production Loss & Cost Estimate

Causation Factor/s

Investigations/ Findings

Recommendations

Corrective/ Remedial Action Taken to Prevent Recurrence

Investigated by: Name	Signature	Date
_____	_____	_____

	Prepared by	Reviewed by	Authorized by	Approved by
Job Title				
Signature				
Date				