

Purpose/Background

Rocky View Schools (RVS), through its strong commitment to Occupational Health and Safety (OHS), requires all staff to report injuries, illnesses, incidents, hazards, near misses and work refusals within 24 hours following such occurrences as a part of their due diligence, legislative requirements, OHS requirements and for reporting to the Workers' Compensation Board (WCB). Incident investigation is also an important part of the illness and injury prevention program.

The RVS electronic incident reporting system is to be used to report all incidents, including those that may require separate WCB and OHS reports and/or investigations. The system is a reporting tool which will guide principals and/or non-school based department heads through the necessary steps to ensure incidents are reported in an appropriate and timely fashion. Please note: The RVS electronic incident reporting system does not replace telephone communications in emergency situations.

Responsibilities

All RVS staff are required to:

- Report to their supervisor any acts or conditions that may be of danger to themselves, other staff, students or the public.
- Report to their supervisor all work-related incidents.
- Ensure employees, contractors and visitors understand that work related incidents need to be reported.
- Participate in incident investigations.

Supervisors:

- Ensure employees, contractors and visitors understand that work related incidents need to be reported.
- Explain to all employees the procedures for incident reporting and the need to immediately report all incidents to their supervisor.
- Conduct level 1 investigations.
- Follow up to ensure corrective actions from incident investigations are completed.
- Review incident investigation recommendations with employees involved (and relevant contractors) to improve their awareness of workplace hazards.
- Create a process for the review of all serious incidents with all staff to prevent further incidents.
- Work with the disability management coordinators to assist employees returning to regular or modified work after extended absences.
- Notify the senior manager HR/OHS or OHS coordinator and contractor representative of any contractor incidents.

Senior Manager of HR/OHS or designate:

- Report injuries under the Alberta Occupational Health and Safety Act, Regulation and Code to include:
 - An injury that results in death.
 - An injury that results in a worker being admitted to hospital.
 - An unplanned or uncontrolled explosion, fire or flood that causes a serious injury or has the potential of causing a serious injury.
 - The collapse of a crane, derrick or hoist.
 - The collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure.
- Conduct a level 2 investigation and prepare report for:
 - A reportable incident.
 - Any other incident that had the potential to cause a serious injury.
- Ensure supervisors are trained in the conduct of level 1 investigations.
- Conduct or assign an investigation team for incidents requiring investigations.
- Ensure incident investigations are completed within 10 working days.
- Review submitted incident investigations and finalize corrective actions.
- Forward report to area director or associate superintendent for review.
- Assign and monitor completion of the corrective actions.
- Share incident findings and learnings with RVS Executive, joint workplace health and safety committee and RVS staff.

Definitions:

Injury/Illness/Exposure: Any event in RVS buildings, on school grounds or at off-site locations for RVS activities which results in personal injury (physical and/or psychological) as well as occupational illness or disease to employees, students, volunteers, visitors or vendors (contractors) and/or exposure to a harmful substance.

Near Miss (No Injury/Illness/Exposure): An incident in which no property was damaged, and no personal injury was sustained but where given a slight shift in time or positions, damage or injury easily could have occurred. E.g., an individual slips on wet floors in the school due to a dripping water pipe but the individual does not sustain any injury.

Risk: The degree of exposure to a hazard based on the likelihood, frequency and severity of the exposure. An exposure may result in injury or illness.

Hazard: Any situation, behaviour, condition or thing that may cause harm to employees, students, volunteers, visitors or vendors (contractors). Hazards may be physical, chemical, biological, or psychological. E.g., a chemical storage room in a science lab does not lock, a sharp edge on a handrail of a staircase, an unstable tall bookshelf in a classroom, a

wasp nest near a playground.

**Property Loss/
Damage:**

Any event or action that results in loss of, damage to or destruction of RVS property. This does not include damage to, or destruction of, a vehicle due to a vehicle accident. E.g., a window is broken in the school due to vandalism, the gym floor is damaged due to a sewer backup, a power outage in the cafeteria causing food to spoil.

Student Behaviour:

Incidents where no injury occurred to the student, but student behaviours are considered inappropriate, concerning or threatening.

Please note: If staff are injured by a student, staff must complete an injury/illness/exposure report and a student behaviour report.

**Dangerous Work
Refusal:**

If an RVS employee believes on reasonable grounds that a dangerous condition exists on the worksite they have the right to stop work and report the concern to their supervisor as per the OHS Act.

PROCEDURE

1. Reporting Requirements

1.1. All incidents must be reported using the RVS online reporting system. The following incidents must be reported:

1.1.1. Work related injuries, illnesses or exposures to staff, students, contractors, volunteers or visitors.

1.1.2. Near misses (no injury, illness, or exposure).

1.1.3. Risks and hazards.

1.1.4. Property loss or damage to RVS property (personal property is not reported using the online system).

1.1.5. Work refusal related to dangerous work.

1.1.6. Vehicle incidents involving RVS owned, rented or leased vehicles as well as private vehicles when used for work purposes.

1.1.7. Student behaviours.

1.1.8. Activation of the school's emergency response plan.

1.1.9. Pest sightings.

2. In the event of an emergency at a school, the incident commander has the authority to make immediate decisions regarding emergency response, as guided by the RVS emergency response plan. As soon as possible, the incident commander will contact the information officer to report the situation via the RVS crisis line at 403.880.2502 to seek further guidance.

3. Incident Investigation

- 3.1. RVS is committed to supporting the health and safety of employees, students, volunteers, visitors or vendors (contractors). Incident investigation is a fact-finding process rather than a fault-finding process. Since incidents vary in severity and impact, the degree of investigation carried out will be related to the severity, impact and/or the potential for actual loss or injury. The principal or non-school based department head will complete all level 1 investigations; however, RVS resources are available to assist in the more serious situations and where legislation requires a level 2 investigation.
- 3.2. The purpose of investigations is to ensure:
 - 3.2.1. Awareness of hazards is raised.
 - 3.2.2. Existing controls are reviewed.
 - 3.2.3. Concern for the safety of staff is demonstrated.
 - 3.2.4. Potential hazards are identified.
 - 3.2.5. Appropriate corrective action is taken.
 - 3.2.6. Legal requirements are met.
4. Whenever an incident occurs, the on-site supervisor will ensure:
 - 4.1. No further injury or damage occurs (identify and control hazards).
 - 4.2. Injured person(s) are properly cared for.
 - 4.3. The scene of the incident is secured to ensure physical evidence is not disturbed before it can be examined.
5. In more serious incidents involving employees, students, volunteers, visitors or vendors (contractors), legislation may require that detailed investigations occur. Examples of situations where legislation requires investigation include:
 - 5.1. A fatality.
 - 5.2. An injury or accident that results in a worker being admitted to a hospital.
 - 5.3. An uncontrolled or unplanned explosion, fire or flood that causes serious injury or has the potential to cause serious injury.
 - 5.4. The collapse of a crane, derrick or hoist.
 - 5.5. The collapse or failure of any component of a building or structure necessary for the structural integrity of a building or structure.
 - 5.6. Trends that are noticed in reporting.

6. The Investigation Process

6.1. Step 1 - Obtain an overview of the situation.

6.1.1. The principal or non-school based department head should attend to the scene of the incident as soon as possible to:

6.1.1.1. Mitigate further injury (E.g., potential secondary incident). For serious incidents, it is important to ensure the scene remains undisturbed until it can be properly investigated.

6.1.1.2. Become oriented with the circumstances. Physical conditions can change quickly and witness' viewpoints can alter with the passage of time. It is important to decide where and with whom the investigation should begin.

6.1.1.3. Determine which RVS staff (superintendent, OHS or business & operations) should be called, if any.

6.2. Step 2 - Gather physical evidence.

6.2.1. Physical evidence may be any object, condition, written statement, event, etc. that may yield information about the incident. Physical evidence relates to what caused the incident. Such things as obstructions, broken or defective equipment, or environmental conditions can contribute to incidents. Isolate any equipment and/or records relevant to the situation.

6.2.2. Physical evidence may include:

6.2.2.1. Photographs of the incident scene.

6.2.2.2. A sketch or drawing showing relevant measurements.

6.2.2.3. Evidence of any unusual circumstances or conditions.

6.2.2.4. Details about environmental conditions such as noise, lighting, air quality or weather.

6.3. Step 3 - Interview witnesses.

6.3.1. Individuals can quickly forget the exact details of an incident. It is beneficial to have witnesses prepare individual signed, written statements regarding the incident prior to being interviewed. These statements should be prepared independently from other witnesses. Witnesses should be interviewed as soon as possible after the incident while the events are still clear in their minds. The witnesses' written statements can be used to assist in the interview process. The individual(s) directly involved should be interviewed first. The interviewer will:

6.3.1.1. Maintain accurate written records of all interviews.

6.3.1.2. Verify witness credibility by ensuring that they can contribute meaningful observations.

6.3.1.3. Conduct interviews at the location of the incident, if possible. This allows both the interviewer and the witness to more accurately relate circumstances and details involved.

- 6.3.1.4. Interview the witnesses separately so that the statement of one witness will not be influenced by overhearing the statement of another witness.
 - 6.3.1.5. Try to put the person being interviewed at ease. Remind the witness of the constructive purpose of the investigation and that the primary purpose of the investigation is to determine facts.
 - 6.3.1.6. Be objective.
 - 6.3.1.7. Try to obtain all relevant information regardless of how insignificant it may seem.
 - 6.3.1.8. When interviewing a witness do not discuss the testimony provided by other witness(es).
 - 6.3.1.9. Have the witness tell their story with minimal interruptions. Review their version of the events step-by-step asking questions to clarify details. Ask open-ended questions like “what happened?”
 - 6.3.1.10. Avoid the use of leading questions, which simply require a yes or no response (e.g., rather than asking “Was there oil on the floor?” ask them to describe the condition of the work area).
 - 6.3.1.11. Summarize your understanding of what the witness said at the end of the interview to ensure that you have an accurate understanding of their statement.
 - 6.3.1.12. Thank witness for their cooperation.
 - 6.3.1.13. When necessary, re-interview to clarify details.
- 6.4. Step 4 - Check any relevant background information.
- 6.4.1. It is important to identify any relevant background or information that may have contributed to the incident. The following questions may need to be answered:
 - 6.4.1.1. Are there any previous incident reports that are relevant to the current incident?
 - 6.4.1.2. Are there any relevant policies, directives, safe work procedures or maintenance records that have relevance to the incident?
 - 6.4.1.3. Are there any safety conditions or procedures that were not in place that contributed to the incident?
 - 6.4.1.4. Is there a history of recurring injury or accidents at the location?
 - 6.4.1.5. Are there reasons why the activity was taking place that contributed to the incident?
- 6.5. Step 5 - Determine causes.
- 6.5.1. Causal factors are defined as events, conditions or circumstances, which the presence or absence of, may have contributed to the incident. All possible

causes should be recorded. Several causes occurring in sequence, or simultaneously, may combine to make an incident inevitable. Some factors that may contribute are delays to:

- 6.5.1.1. Eliminate all unsafe work conditions or behaviour.
- 6.5.1.2. Plan and/or implement appropriate procedures.
- 6.5.1.3. Purchase appropriate tools and/or equipment.
- 6.5.1.4. Train employees.
- 6.5.1.5. Control hazardous situations.

6.5.2. When analyzing causal factors, remember that those who are close to the area where the incident occurred are often in the best position to identify the factors that represent risks to their health and safety. They may also be in the best position to assist in developing corrective strategies that will remove the underlying risk factors from their workplaces.

6.5.3. To plan practical preventative measures, causes are divided into two major areas: direct (immediate) causes and root (underlying) causes. To try and find the root causes of an accident, many questions must be asked that look beyond direct causes. One way to identify root causes is to ask: "Have all the why's been answered?" If there is still an unanswered question, all the root cause(s) may not have been identified. If the analysis is complete, the root cause should be apparent and provide a firm basis for making recommendations. Although not a comprehensive list, some specific details related to these causes are provided in Appendix 1.

6.6. Step 6 - Recommend corrective action.

6.6.1. Based on the analysis of root causes, recommendations may now be made for corrective action. Corrective actions should:

- 6.6.1.1. Treat the cause not the effect.
- 6.6.1.2. Ensure that the recommended measures will enhance and not restrict overall operational effectiveness.
- 6.6.1.3. Eliminate or control all causes.
- 6.6.1.4. Include immediate interim action and/or a long-term remedial plan and timeline.
- 6.6.1.5. Determine follow-up recommendations necessary to prevent re-occurrence.

6.6.2. If the indirect cause(s) are job/system factors, possible recommended corrective actions may include:

- 6.6.2.1. Training or retraining of affected employees.
- 6.6.2.2. Revising task procedures.
- 6.6.2.3. Review of the appropriateness of the employee's assignment.

6.6.2.4. Review of selection criteria for certain positions.

6.6.2.5. Review of RVS standards for a particular type of equipment or material.

6.6.3. If the indirect cause(s) are human factors, corrective action may be initiated.

7. Training Requirements

- 7.1. The senior manager HR/OHS is responsible for ensuring appropriate RVS employees have knowledge about the procedures used in reporting and investigating incidents. This will involve employees who are at specific work sites, as well as employees who carry division wide responsibilities.
- 7.2. All supervisors will be provided with information related to incident reporting and investigation.
- 7.3. Supervisors shall review relevant information regarding incident reporting and investigation with their employees on an annual basis. Emphasis should be placed upon the need for timely reporting.
- 7.4. RVS health and safety representatives serve as a resource for principals and non-school based department heads regarding the incident reporting and investigation process. Assistance may also be obtained from the RVS joint workplace OHS committee or HR/OHS department.

8. Dangerous Work Refusal

- 8.1. If any RVS employee believes on reasonable grounds that a dangerous condition exists on the worksite, they have the right to stop work and report the concern to their supervisor or site administrator. Dangerous conditions should be reported verbally and by using the RVS online reporting system as a "Risk/Hazard." The employee's supervisor has the right and responsibility to ensure the concern is investigated and to take steps to stop the work until adequate hazard controls are in place. Supervisors and employees must distinguish this work refusal procedure from every day due diligence associated with the recognition, reporting and correcting of workplace safety hazards. The following are some things to keep in mind when exercising the right of refusal:
- 8.2. The Refusal Process - Employees must follow the proper refusal procedures:
 - 8.2.1. Stage 1: Notification - Employees must first notify their supervisor if they believe that a dangerous condition exists which constitutes a danger to themselves or that of another person.
 - 8.2.2. Stage 2: Internal Resolution
 - 8.2.2.1. The supervisor must immediately investigate the circumstance of the refusal to work and ensure there is a level 1 investigation completed in response to the "risk/hazard" submitted by the employee. If the work refusal is not safety related, the work refusal stops, the

employee returns to work and addresses the concern using other appropriate avenues.

8.2.2.2. The supervisor will take any remedial action necessary to address the dangerous condition(s) or ensure that such an action is taken. Contact the Senior Manager of HR/OHS or OHS coordinator for support and assistance, or if you are unsure if a hazard exists or a work stoppage is necessary.

8.2.2.3. If the issue can be resolved, the supervisor will state how it was resolved in the level 1 investigation through the RVS online reporting system.

8.2.3. Stage 3: Inspection

8.2.3.1. If the supervisor is unable to remedy the dangerous condition immediately or should the employee be dissatisfied, the supervisor will contact the Senior Manager HR/OHS or OHS coordinator for a level 2 investigation. The employee may be assigned to an alternative task while the work stoppage is being investigated. The supervisor will review the job hazard assessment (JHA) forms for the work being refused to determine if it has been documented, along with all the related hazards and controls.

8.2.3.2. If the hazard related to the work refusal has been identified on the JHA, and the employee feels the controls are inadequate, the supervisor should continue with the dangerous work refusal and review the JHA with the employee to determine if alternate controls are required.

8.2.3.3. If the work is not identified on the JHA, the process of work refusal should continue as outlined below and the JHA should be updated with the new hazard(s) identified and the appropriate controls implemented.

8.2.3.4. Should the issue be resolved, the RVS OHS investigator will state how it was resolved in the level 2 investigation through the RVS online reporting system.

8.2.3.5. The work may be assigned to another employee if the supervisor has determined that the work does not constitute a danger to the health and safety of any person or that a dangerous condition does not exist.

8.2.3.6. If assigning the work to another employee, the supervisor shall ensure the following:

8.2.3.6.1. the employee to be assigned is qualified, trained and/or under adequate supervision, and will not be exposed to dangerous conditions.

- 8.2.3.6.2. the dangerous condition has been remedied for the new employee.
- 8.2.3.7. If the work is assigned to another employee, the supervisor will advise the employee verbally and in writing of:
 - 8.2.3.7.1. the first employee's refusal.
 - 8.2.3.7.2. the reason(s) for the refusal.
 - 8.2.3.7.3. the reason(s) the supervisor deems the work not to be dangerous to the health and safety of the worker or any other person or a dangerous condition is not present.
 - 8.2.3.7.4. the employee's right to also refuse dangerous work.
- 8.2.3.8. Upon completing each inspection, the supervisor shall record and track all corrective actions and information related to the work refusal. A copy of this form shall be provided to:
 - 8.2.3.8.1. the employee who refused the work and reviewed by/with the supervisor.
 - 8.2.3.8.2. the division health & safety department.
- 8.2.4. Stage 4: Government OHS Official Investigation
 - 8.2.4.1. Every reasonable effort shall be made to resolve any dangerous work condition that may exist as soon as possible; however, if the dangerous condition is not remedied after stage 3 inspection (as outlined above), the employee who refused the work or any person present during the inspection may file a complaint with an Alberta Occupational Health and Safety (OHS) Officer.

Appendix 1 – Direct and Root Causes

Direct (immediate) causes - unsafe acts or conditions that lead directly to the incident. These could include:		
	Causes	Examples
Unsafe Acts	Operating without authority.	<ul style="list-style-type: none"> • Entering a confined space without a permit. • Welding, repairing of tanks, containers, etc. without appropriate certification.
	Improper use and maintenance of tools/equipment.	<ul style="list-style-type: none"> • Inadequate cleaning, oiling or adjusting. • Using inappropriate tools, e.g. knife instead of screwdriver. • Modifying or removing safety devices.
	Mixing of incompatible chemicals.	<ul style="list-style-type: none"> • Mixing a bleach-based product with an acid-based cleaner creating toxic chlorine gas.
	Wearing inappropriate or poorly fitting personal protective equipment (PPE) or not wearing it at all.	<ul style="list-style-type: none"> • Not wearing safety goggles when working with chemicals. • Not wearing disposable gloves while being exposed to human body fluids. • Not wearing arm shields when assisting students with complex needs.
	Wearing unsafe personal attire.	<ul style="list-style-type: none"> • Loose fitting clothes or jewelry while operating machinery. • Not tying hair back.
	Inappropriate behaviour/unsafe attitude.	<ul style="list-style-type: none"> • Horseplay near operating equipment. • Failure to listen to direction. • Refusal to follow safe work procedures. • Complacency.
Unsafe Conditions	Improper or unsafe lifting techniques.	<ul style="list-style-type: none"> • Lifting heavy objects without assistance or proper equipment.

	Exceeding safe load limits.	<ul style="list-style-type: none"> Overloading of vehicles or lifts. Overloading of shelving resulting in collapse.
	Inappropriate storage or placement of materials.	<ul style="list-style-type: none"> Storage of oxidizing agents near metals. Not storing flammables in flammable cabinets.
	Environmental conditions.	<ul style="list-style-type: none"> Excess noise, poor lighting or inadequate ventilation. Ice, mud, windy weather. Heat or cold. Air quality.
	Obsolete, faulty, or worn-out equipment.	<ul style="list-style-type: none"> Using a saw with a dull blade. A frayed electrical cord.
	Inadequate or missing safety devices.	<ul style="list-style-type: none"> Not having a guard available to use with a table saw. Having inappropriate goggles in a Science Lab for handling chemicals. Not having proper PPE for student interactions.
	Housekeeping	<ul style="list-style-type: none"> Accumulation of debris and clutter compromising emergency evacuation of area. Electrical cords across walking areas creating a tripping hazard. Biological and health hazards created by unclean conditions.
	Engineering and design.	<ul style="list-style-type: none"> Inadequate design or space for operation of equipment. Improper placement of equipment.
Root (underlying) causes - Root cause are fundamental flaws in the Employer's Health and Safety Management System.		
	Causes	Examples
Job/ System Factors	Individual knowledge or training.	<ul style="list-style-type: none"> Training program not adequate to prepare individual for task assigned.

		<ul style="list-style-type: none"> Employee not adequately familiar with the expectations of RVS health and safety program.
	Selection and assignment of employees.	<ul style="list-style-type: none"> Having only one person available to perform tasks that should be completed by two or more individuals. Assign work beyond an individual's training and physical abilities. Employment limitations
	Local level implementation of the Division Occupational Health and Safety Program.	<ul style="list-style-type: none"> Position Hazard Assessments and Task Hazard Analysis not reviewed with employee. Lack of safety meetings and employee involvement. Lack of emergency preparedness.
	Division supervision of an Occupational Health and Safety Program.	<ul style="list-style-type: none"> Lack of follow-up on the implementation of RVS' occupational health and safety program. Lack of financial resources for high priority health and safety requirements. Not monitoring contractor adherence to RVS health and safety requirements.
	Preventive maintenance and equipment replacement programs.	<ul style="list-style-type: none"> Annual required inspection of equipment did not occur. Routine daily inspection of equipment not done. Failure to complete hazard (near miss) reports when hazards are identified.
	Purchasing guidelines.	<ul style="list-style-type: none"> Ordering larger quantities of chemicals than necessary. Purchasing 4 caster chairs instead of safer 5 caster chairs.
Human Factors	Physical and mental conditions.	<ul style="list-style-type: none"> Physical fitness. Temporary physical limitation such as illness, minor injury, etc. Distractions