

Incident Management Procedure

Purpose

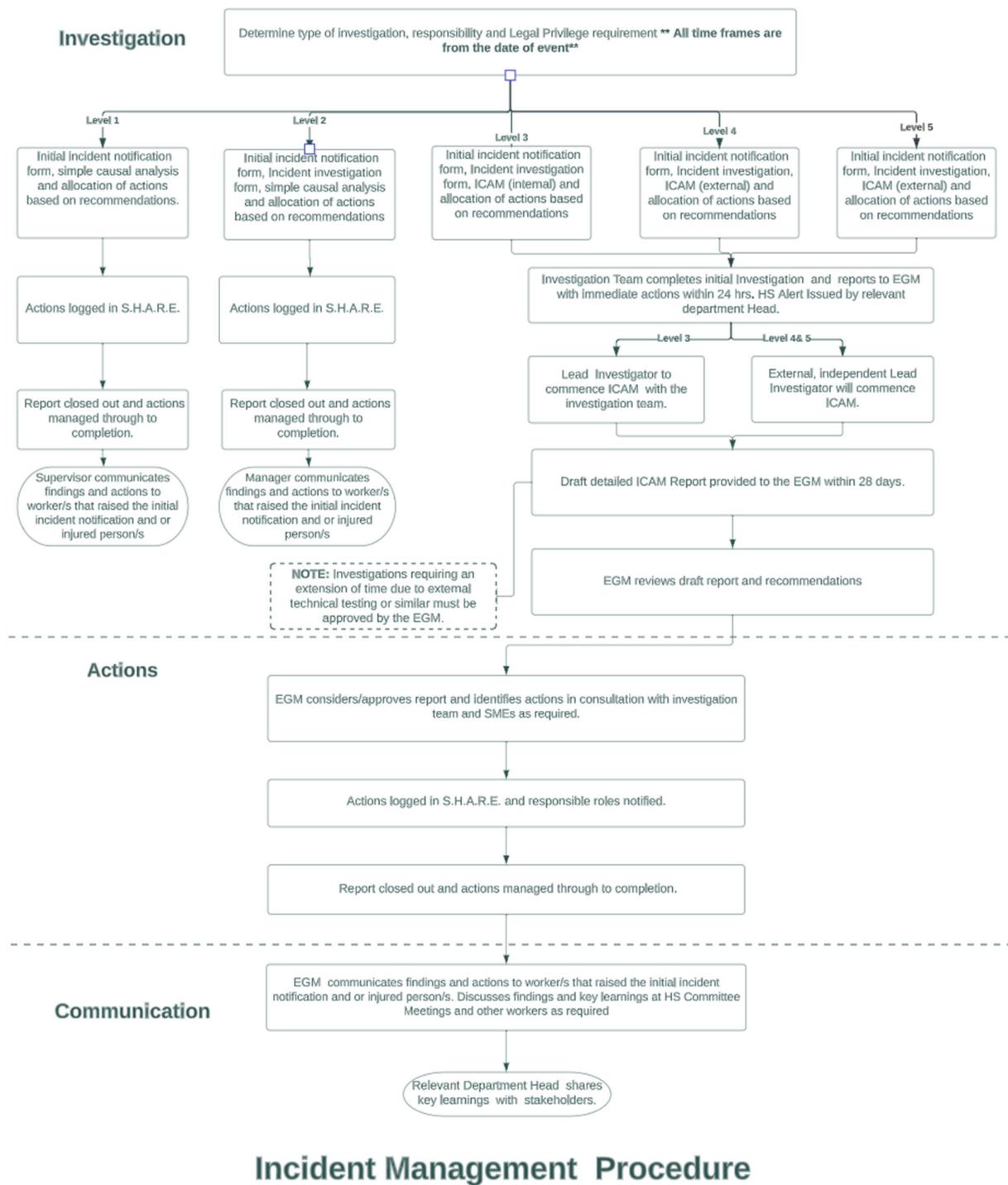
To define the process Queensland Hydro shall use to notify, classify, investigate, and report incidents.

Scope

This procedure applies to all incidents that occur within a Queensland Hydro workplace or are caused by, or arise from, its business or undertakings.

Document ID: HS-PRO-0026		Title: Incident Management Procedure		
Author:	Kelly Palmer	Head of Health and Safety	Version Date:	24 January 2024
Approver:	Greg Tonks	EGM, Corporate	Revision ID:	C

Process Map



Procedure

1 Incident Initial Response

When an incident occurs, the first priority for all workers is to ensure the safety of people and the community, second is to protect the environment and the third is to protect Queensland Hydro's plant, equipment, and business operations.

1.1 Immediate Actions

- Make the area safe;
- Render assistance and where applicable apply first aid in accordance with First Aid Procedure (HS-PRO-0005);
- Prevent further harm to persons and / or the environment (e.g., in the event of a spill closing valves, containing spill in bunds etc);
- Secure the site and preserve the scene, take photos / videos if appropriate and only to the extent necessary; and
- Report the incident to a supervisor / manager.

Where an incident requires an emergency response, the processes detailed in **Crisis and Emergency Management Procedure (HS-PRO-0029)** are to be followed.

1.2 Suspension / Cease Work

Any worker involved in a high potential incident associated with work activities, is to cease that work activity immediately until the completion of the investigation or until sufficient information is available for a manager to authorise the person(s) to return to normal operations.

1.3 Hierarchy of Authority at an Incident Scene

External authorities including the Department of Environment, Science and Innovation (DESI), WorkSafe QLD, Queensland Police Service or other Emergency Services may attend an incident site and through invested legislative powers, a representative from an external authority may take control of an incident site. In these situations, Queensland Hydro's prime responsibility is to maintain site safety, reduce further risk to people and the environment, provide any specialist advice and render assistance to the external authority. The external authorities may take possession of physical evidence from the scene. Advice, evidence, or assistance provided to external authorities should be done in consultation with the Queensland Hydro Legal Team.

1.4 Preservation of an Incident Scene

Where an external authority has taken control of an incident site, or following a significant/ high potential incident, the Supervisor/ Manager must take steps to ensure the site is preserved and secured for investigation purposes. The site, including associated plant, substances, structures, documents or things must be secured to prevent unauthorised entry. Where an external authority has taken control of an incident site, no work can resume until the external authority has released the site back to Queensland Hydro.

1.5 Legal Professional Privilege

If there is potential for an incident to raise serious regulatory or other legal risks (e.g.; serious pollution event), the Queensland Hydro Legal Team and the Incident Owner and / or Manager shall consult to determine if the incident is to be protected by legal professional privilege and implement relevant privilege protocols. See also Section 3.2 External Notification.

2 Post-Incident Response

2.1 Drug and Alcohol Testing

Drug and alcohol testing shall be carried out as soon as possible after the incident occurs for incidents classed as Level 3, 4 or 5 or when there is reasonable belief that drugs and/or alcohol may have been involved as a contributing factor to a Level 1 or 2 incident. Testing is to be in accordance with **Managing Alcohol and Other Drugs (HS-PRO-0021)**.

2.2 Appoint an Incident Owner

An Incident Owner shall be appointed as soon as possible after the incident occurs as per **Event and Impact Classification Matrix (HS-STD-0003)**.

2.3 Support

The supervisor / manager is to ensure support is offered as soon as possible to workers who witnessed or are affected by the incident. This may be facilitated by the Health and Safety and/or People and Capability teams and through use of the employee assistance provider.

3 Notification

3.1 Internal Notification

Workers must **immediately verbally notify** their supervisor / manager at the time of the incident for all:

- level 3, 4 or 5 incidents; or
- serious or material environmental harm; or
- recordable injuries (i.e. lost time, medical treatment or restricted work injuries).

For other incidents workers are to verbally notify their supervisor/ manager as soon as practicable and at a minimum by the end of the work day/ work shift. If there is doubt as to the level of an incident, it is prudent to consult the Manager. Information to be provided at this stage includes:

- what has happened, including detail of any harm caused;
- actions already taken; and
- current incident status.

Information provided must be facts only, not statements of opinion or assumptions.

Refer to **Appendix 1** for examples of what to report as an Environmental Incident.

In the event of a serious injury, the next of kin should be notified as soon as possible. When notifying a next of kin, **at least two** of the following persons should be present:

- direct Manager;
- CEO (or their nominated delegate); or
- Accountable EGM (or their nominated delegate).

In the event of a fatality, Queensland Police Service will be responsible to do the notifications to next of kin.

3.2 External Notification

Where incidents may trigger the obligation to notify an external authority, for example a serious environmental or safety incident, the relevant Functional Manager (i.e. Head of Health and Safety or Head of Environment) must consult with the Legal Team prior to making any external notification.

Where external notification is required, only the relevant Functional Manager (or their delegate) must make the external notification within timeframes prescribed in applicable legislation.

Where a notifiable incident occurs involving a contractor, the contractor will notify the state-based regulator directly and will provide Queensland Hydro with evidence of this notification.

Refer to **HS-GUI-0003 Health, Safety and Environmental Statutory Notification Guideline** for further information.

3.3 Recording an incident

All incidents are to be recorded in the Queensland Hydro online incident management system, S.H.A.R.E, within **24 hours** by either a person involved or if they are not able, their supervisor; or Queensland Hydro Accountable Individual for incidents involving contractors.

Only factual details of the incident are to be recorded, not statements of opinions or assumptions.

3.4 Determining Work-relatedness of Injury or Illness

Exclusions are applied to ensure that injuries and illnesses classified as work-related are ones where the causal factors are to some extent 'controllable' by Queensland Hydro and hence are an accurate reflection of the effectiveness of the health and safety management system. Refer to **HS-PRO-0037 HS Reporting and Analysis Procedure** for examples of injuries and illnesses that are not considered work-related.

3.5 Community Complaints

Incidents may arise from community complaints; for example a report of poor driving behaviour. Community enquiries or complaints are generally received by the Communications and Stakeholder Engagement Team. If a complaint is received the Communications and Stakeholder Engagement Team will consult either the Health and Safety or the Environment, Approvals, and Land Team (dependent on nature of the complaint). The Communications and Stakeholder Engagement Team will record the complaint in Consultation Manager. The Health and Safety or Environment, Approvals, and Land Team will undertake a pre-screening assessment to determine if the complaint will be recorded and managed as an incident.

3.6 Determining Severity

All incidents shall have one or more Impacts recorded. Each Impact must be classified and a consequence severity rating assigned as per the **Event and Impact Classification Matrix**.

3.7 Assessing the Impact(s)

Impacts may be actual, for example an injury was sustained as a result of the incident (safety impact), or potential i.e. an interaction with a hazard occurred, however no injury / illness was sustained as a result of the incident. This is also known as a Near Miss incident.

Each Impact (whether actual or potential) shall be assessed and a severity level assigned (Level 1 to Level 5). To determine the Impact severity level:

- Actual consequence - ascertain the extent of the actual harm sustained.
- Potential consequence - decide the credible worst case scenario **if** the controls that were in place at the time of the incident were not effective.

3.8 Determine Level of the Incident

The level of the incident may change from the initial classification post review or investigation. The final level of the incident must be at least the same as the highest severity level of its associated Impacts.

The Incident Owner, investigation protocol, notification and stakeholder groups for each incident Level are defined in the **Event and Impact Classification Matrix**.

4 Investigation

The investigation protocol used shall correspond with the relevant incident level as defined in **Event and Impact Classification Matrix**.

4.1 Investigation Team

The Incident Owner must establish an investigation team for all Level 2, 3, 4 and 5 incidents. A Level 1 incident may be investigated if necessary. Members of an investigation team must not have been directly involved in the incident that is being investigated. The composition of the investigation team is at the discretion of the Incident Owner.

The level of investigation is determined by the severity level of the incident. The table below provides a guide for the number of people required in an investigation team:

Incident Level	Investigation Team Composition
Level 1	Supervisor
Level 2	Manager plus 2 - 3 workers
Level 3, 4 & 5	Manager plus: <ul style="list-style-type: none"> • A worker or management representative from a different part of the business; and • A subject matter expert specific to the nature of the incident - for example an Electrical Engineer for an electrical incident; and • A functional matter expert specific to the nature of the incident - for example representative from the Health and Safety or Environment, Approvals and Land teams.

The Incident Owner must appoint one of the investigation team members as Lead Investigator to maintain oversight over the conduct of the investigation. Lead Investigators and team members must have the level of training identified in section 7 Training and Competency. For level 4 and 5 incidents an external lead investigator will be appointed

All members of an investigation team and any workers required for interviews or witness statements must prioritise the investigation above all other work commitments.

4.2 Fair and Just Culture

Where an incident raises questions of worker conduct and the potential for a worker to be stood down pending the investigation or disciplinary action, the relevant Manager must immediately notify the People and Capability team to enact the **Fair and Just Culture Procedure (HS-PRO-0027)**. In these instances the incident will be marked as 'confidential' within S.H.A.R.E. to protect the interest of the individual(s).

4.3 Documenting the Investigation

The table below outlines the format of each investigation report.

Incident Level	Investigation Report Template
Level 1 and 2	Direct into S.H.A.R.E
Level 3, 4 & 5	ICAM Incident Investigation Report Template (HS-FRM-0018)

4.4 Corrective Actions

The Incident Owner is responsible for reviewing the investigation findings and recommendations and determining corrective actions to prevent recurrence. Actions should:

- address findings and recommendations;
- eliminate the risk of a similar recurrence or if this is not practicable, minimise the risk by applying the hierarchy of controls;
- follow the S.M.A.R.T guiding principles - specific, measurable, attainable, realistic and timely.

All actions must be entered into S.H.A.R.E. with a responsible person (action recipient) and due date assigned. Prior to assigning action responsibilities, the Incident Owner must consult with the action recipient, to ensure they understand and agree to what is required and can complete within the nominated timeframe.

4.4 Investigation Peer Review

All Level 3,4 & 5 investigations shall undergo peer review by the Senior Leadership Team through regular incident review meetings. Investigations of Level 1 and Level 2 incidents may also be reviewed at the discretion of the Senior Leadership Team.

The Lead Investigator shall present findings from the investigation and recommend corrective actions for consideration.

The investigation cannot progress past peer review until all corrective actions, action owners, due dates and the learning communication plan is finalised and agreed by the group.

4.5 Investigation Closeout

Incident investigations are to be completed according to the closeout timeframes in the table below.

Incident Classification	Closeout timeframe
Level 1 & 2	No more than 14 days following the notification of the incident.
Level 3,4 & 5	Within 28 days following the notification of the incident, with weekly monitoring by the incident Owner until complete.

Where these timeframes cannot be achieved, for example due to the complexity of the incident, an alternative timeframe will be agreed with the Incident Owner and the relevant Executive General Manager.

The incident investigation is finalised only when the Incident Owner is satisfied that:

- investigation protocols were effectively used;
- the investigation report is complete including any changes / additions required by the incident review meeting;
- actions are agreed and are appropriate; and
- all incident information including contributing factors, corrective and preventative actions are recorded into S.H.A.R.E.

4.6 Closing an Incident

Prior to closing the incident, the Incident Owner must ensure the event record in S.H.A.R.E is complete with all information pertaining to the incident and actions included. If satisfied, the Incident Owner is to close the incident in S.H.A.R.E.

5 Learning from Incidents

5.1 Incident Alert

An initial notification shall be prepared, where deemed appropriate, by the relevant functional department (Health and Safety or Environment, Approvals and Land) **within 24 hours** for all significant or high potential incidents. The Alert will be distributed to other stakeholder locations, so that if similar unsafe conditions exist appropriate measures can be taken to mitigate similar occurrence.

5.2 Incident Learning

Following the completion of an incident investigation, incident learnings will be produced by the relevant functional department (Health and Safety or Environment, Approvals and Land) in collaboration with the Incident Owner and will be distributed to employees and relevant contractors via email and posted on noticeboards.

Incident learnings must be authorised and issued by the relevant Functional Manager (Head of Health and Safety or Head of Environment, Approvals and Land).

6 Incident Management Review

Functional Departments shall review incidents which occur within the business to identify lessons learned, trends, and / or organisational improvements that need to be implemented to eliminate or minimise the risk of a similar recurrence.

Functional Departments and Incident Owners shall periodically review closed incidents to ensure implemented actions continue to be effective, relevant and sustained.

7 Training and Competency

Through induction, all employees and contractors will be trained on incident management requirements. To be appointed as an ICAM Lead Investigator, the individual must have completed the agreed ICAM training and have the relevant practical experience.

8 Records Management

All records relating to incidents are to be stored in S.H.A.R.E.

The investigation report forms the major part of the incident record, and should include copies of relevant evidence, statements, processes and other information as attachments.

Responsibilities

Role	Responsibilities
Workers, including contractors	<ul style="list-style-type: none"> • Report all incidents that they are involved with or witness. • Participate in the investigation process when requested and prioritise this involvement above all other work commitments.
Accountable Individual	<ul style="list-style-type: none"> • Report all incidents that involve a contractor under their control. • Share applicable incident alerts and learning with contractors under their control.
Functional Department Health and Safety or Environment, Approvals and Land	<p>Accountable for:</p> <ul style="list-style-type: none"> • Ensuring the classification and ownership of incidents are defined correctly in accordance with the Event and Impact Classification Matrix. • Review investigations for timeliness and quality; • Notify external parties in a timely manner, in consultation with the Legal Team; • Periodically review closed incidents for effectiveness and continued relevance of implemented actions; • Facilitate the incident peer review meeting; and • Monitor the effectiveness of the implementation of this procedure.
Incident Owner	<p>Accountable for ensuring that:</p> <ul style="list-style-type: none"> • Requirements of this procedure are applied to incidents to which they are the owner; • The classification of the incident is correct; • Appropriate competent resources are appointed for investigating incidents; • Investigation team members are independent and not directly involved with the incident; • The correct investigation protocols are applied for the level of incident; • The incident record in S.H.A.R.E is complete prior to finalisation of the investigation; • Actions are appropriate, agreed and implemented prior to being closed out; and • Closed significant incidents are periodically reviewed to ensure corrective actions continue to be relevant and sustained.
Lead Investigator	<p>Accountable for:</p> <ul style="list-style-type: none"> • Ensuring the investigation is conducted in accordance with the protocols; • Timeframes for completion of investigations are adhered to; • General direction of the investigators and their conduct;

	<ul style="list-style-type: none"> Preparation of the incident investigation report; Presenting investigation findings at the incident review meeting; Enter investigation actions into S.H.A.R.E once agreed by the Incident Owner.
Legal Team	<ul style="list-style-type: none"> Monitor notifications generated by S.H.A.R.E If required following consultation with the Incident Owner and / or Functional Manager, set up legal privilege over any material and communications associated with an incident and its investigation.
Supervisor	<p>Accountable for ensuring:</p> <ul style="list-style-type: none"> Incident management activities are conducted consistently and in accordance with this procedure; The site is preserved and secured for investigation purposes following a serious incident; Event is entered in S.H.A.R.E .

Defined Terms

Term	Definitions
Community Complaint	Community complaints can include general complaints (driving / behaviour etc) and complaints received relating to noise, air emissions, and surface and groundwater contamination that are confirmed as being related to the operation of our sites.
Hazard	Something with the potential to cause harm to a person or the environment.
Impact	An impact is the direct consequence of an incident. An impact may be actual or potential and can have different severity ratings. An incident may have one or multiple impacts.
Incident	Interaction with a hazard that is unplanned and that results in one or more actual or potential Safety, Environment, Financial, Compliance, or Reputational consequences, occurring either onsite or offsite.
Incident Cause Analysis Method (ICAM)	A systematic incident investigation analysis method that enables identification of systemic health, safety, security or environmental deficiencies, assists investigation teams to identify incident root and causal factors and ensures recommendations are focused on what needs to be done to reduce recurrence.
Incident Owner	The person responsible for incident classification, general oversight of the investigation process, sign-off and other accountabilities as specified in this document.
Lead Investigator	The person responsible for investigating the Incident (supported by team members) with accountabilities as specified in this document.
Near miss	An incident with no actual consequences. A potential impact.
Notifiable incident	An incident that requires notification to a Regulator such as WorkSafe QLD, Dept of Environment and Science (DES).
Recordable Injury	A Lost Time Injury, Medical Treatment Injury, or a Restricted Work Injury
Workplace	A place where work is carried out for Queensland Hydro and / or is a Queensland Hydro controlled site, and includes any place where a worker goes, or is likely to be, while at work. A place can

Term	Definitions
	include a vehicle, vessel, aircraft, mobile structure or any installation on water that a worker might be at while at work.
Work-related injury or illness	An injury or illness is work-related if exposure in the workplace either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from incidents or exposures occurring in the workplace, unless an exception as detailed in Section 3.4 of this procedure applies.

References

Document code	Document title
HS-PRO-0029	Crisis and Emergency Management Procedure
HS-PRO-0005	First Aid Procedure
HS-GUI-0003	Health, Safety and Environmental Statutory Notification Guideline
HS-STD-0003	Event and Impact Classification Matrix
HS-PRO-0027	Fair and Just Culture Procedure
HS-FRM-0048	Witness Statement Form
HS-PRO-0012	Rehabilitation and Return to Work Procedure
HS-FRM-0018	ICAM Incident Investigation Report Template
HS-PRO-0021	Managing Alcohol and Other Drugs Procedure
HS-PRO-0037	HS Performance Reporting and Analysis Procedure

Appendix 1: Examples of what to report as an Environmental Incident

The following are examples of what one could report as an environmental incident, whether the incident occurs on or off a site controlled by Queensland Hydro.

- Unapproved clearing of vegetation or over clearing of an area outside clearing boundary;
- Accidental felling of a tree;
- Death of a native animal or species;
- Damage to structures / items of cultural / heritage significance, or significant infringement of cultural values / sacred locations;
- Breaching of property biosecurity requirements;
- Spills (e.g., hydrocarbons, chemicals, drilling mud) to soil or water outside of a bunded area, including whilst material is being transported off site;
- Unapproved storage, transport, treatment or disposal of waste;
- Generation of dust, noise, vibration or odour causing sensitive receptor complaints, causing periodic inconvenience or disruption to community and the environment;
- Non-contained hazardous dust generation, e.g., asbestos dust;
- Pollutant discharge to water, including offsite discharge;
- Breach of noise restrictions outside approved hours;
- Non-compliance with a project Environmental Management Plans (e.g., platypus management plan);
- Non-compliance to permit to access or permit to disturb;
- Non-Compliance with regulatory requirements;
- Failure of or non-compliance with environmental controls in Safe Work Method Statement; and
- Any other environmental issue that seems “out of the ordinary” or unexpected.

IF YOU AREN'T SURE OR HAVE QUESTIONS, PLEASE CONTACT THE ENVIRONMENT, APPROVALS AND LAND TEAM FOR SUPPORT at environment@qldhydro.com.au.