

PROCEDURE 401

Incident and Near Miss Investigation and Reporting



INTENT

This procedure defines the requirements for investigation, reporting and notification of workplace incidents, illnesses, complaints and near misses.

Why

Responding to work place incidents promptly and effectively is important in minimizing subsequent impacts and ensuring that similar incidents are avoided in future. A sound investigation is an impartial, objective, non-judgemental exercise in establishing and analysing the facts of an incident or near miss. It is an important tool in establishing where failures have occurred and identifying any necessary changes to prevent similar incidents.

Near-miss incidents are also investigated as a preventative strategy based on the inherent risk.

In some circumstances, Visy's legal team will request an investigation be undertaken for the purpose of providing legal advice regarding any potential liability under work health and safety, environmental legislation or arising from civil proceedings (Privileged Investigations).

How

Visy maintains an Incident Management System (**Vault**) for the reporting and investigation of any of the following events that occur at Visy sites, Visy controlled entities or whilst undertaking any Visy-sanctioned activity:

- Injuries or illnesses;
- Incidents or near misses;
- Property loss or damage;
- Environmental damage; and
- Contractor and visitor events falling into any of the above categories.

Vault is an important HSE record of the events, actions and other relevant detail associated with an incident or near miss, including root causes for high risk incidents, and actions to reduce the likelihood of recurrence.

Incident Recording

All incidents are to be entered in to Vault within 24 hours.

Vault reports must be completed in accordance with Vault Guidelines. The Vault Guidelines are available on the HSE System B Portal/Safety and Environment Services / HSE Apps / HSE System/ Quicklinks or Visy LMS.

See also HSE Procedure 204 – Vault Injury and Severity Classifications.

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Risk Based Incident Investigation

Vault Incidents are hazard ranked according to the guidelines set out in HSE Procedure 204 – Vault Injury and Severity Classifications and HSE Procedure 403 Incident and Complaint Classification. As incidents relate to events which have occurred, it is not possible to have a frequency rating less than 3 (Possible), meaning all Vault incidents will have a rating between 4 and 10.

Low to Moderate Incidents

Incidents rated Level 4-6 (low to mod hazard) must as a minimum, be reviewed promptly, have an action noted and be signed off to ensure that a record is held on the Vault system. These lesser hazards are to be assessed on a regular basis by Site Management to determine common low risk incidents. Common hazards identified shall be investigated and actions developed to reduce their frequency and severity.

Incident Reports for these common hazard low risk incidents and other low to moderate incidents that require further investigation are to be documented on Form 401.8 Incident Short Investigation Form.

Site and Production Managers are responsible for ensuring that prompt reviews and investigations are undertaken and actions are implemented.

High Risk Incidents

All Incidents (including MTIs and LTIs) rated Level 7 and above (high to extreme) must be investigated to determine the root cause, other influences and corrective actions. Table 1 can be used as a guide to these investigations.

The Site - assigned member of the HSE Team should be consulted with prior to completing an investigation into a High Risk Incident.

Visy's legal team may request that an investigation into a High Risk incident is completed under privilege for the purpose of anticipated litigation and/or the purpose of providing legal advice.

Incident reports for extreme High Risk Incidents may be documented on Forms [401-1 Initial Incident Summary Report](#) and [401-2 Incident Investigation Form](#) in addition to the Vault record, or by other means where the investigation is requested by Visy's legal team to be conducted under privilege.

High Risk Incidents may include:

- Death or permanent disability to a person;
- A significant fire;
- Any significant environmental impact;
- Significant property damage;
- Events likely to give rise to adverse community impact;
- Events likely to result in legal proceedings against Visy or a client;
- Events reported to the Statutory Authorities;
- Significant recordable injuries; or
- Are significant 'Near Miss' Injuries' with the potential to cause any of the above.

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TABLE 1 Incident Investigation Levels based on Vault classification HSE Form 301

Rating	Investigation level
4-6 Low to Moderate	Action noted on Vault and incident closed off. Or Short Investigation Form 401-8 for common/reoccurring incidents
7-8 High	Investigation using Vault tools to determine causes and record actions. Or Short Investigation Form 401-8 Or As directed by Visy's legal team
9-10 Extreme	As directed by Visy's legal team Or Full investigation Forms 401-1 and 401-2 as directed by Site HSE Manager

Incident and Complaint Classification

Refer to [HSE Proc 403 – Incident and Complaint Classification](#) and [HSE Procedure 204 – Vault Injury and Severity Classifications](#).

Incident and Investigation Forms

The use of standard forms for the following purposes is strongly recommended to ensure consistency and coverage of key investigation and reporting issues.

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Form	Purpose
401-1 Incident Immediate Summary	To provide a factual overview of chronology of the incident and the actions to respond to it and to form part of the full incident investigation report
401-2 Incident Investigation Form (Privileged and Confidential)	To be primarily used when instructed by Visy's legal team to conduct an investigation under legal professional privilege. Provides a standard template for conducting cause analysis and formulating actions/controls.
401-3 Significant Safety Occurrence Template	A standard form for the communication of lessons from safety incidents
401-4 Safety Alert Template	A standard form for the communication of safety news and issues
401-5 Significant Environmental Occurrence Template	A standard for the communication of lessons from environmental incidents
401-6 Environmental Alert Template	A standard form for the communication of environmental news and issues
401-7 Environmental Incident External Report	To provide a structure for the initial reporting of incidents to environmental regulators where written notification is required
401-8 Incident Short Investigation Form	An alternative to the full incident investigation report. To be primarily used when conducting non-privileged investigations when it is considered appropriate to further investigate by identifying causes and actions/controls.
204 - Injury Classification Wall Chart	Injury classification

Incident Reporting and Communication

Internal Reporting:

Visy uses [401-4 Safety Alerts](#), [401-6 Environment Alerts](#), [401-3 Significant Safety Occurrence Forms](#) and [401-5 Significant Environment Occurrence Forms](#) to communicate relevant serious incidents and near misses internally. The decision to release an Alert or Significant Occurrence Form is made by the Group Manager Safety and Environment.

All [Safety Alerts](#), [Environment Alerts](#), [Significant Safety Occurrences](#) or [Significant Environment Occurrences](#) are to be communicated to the relevant staff via tool box talks or HSE committee and pinned on notice boards. Applicable lessons learnt are to be reviewed at a site level and pertinent actions implemented.

External Reporting:

Where the incident is required to be reported to the relevant Authorities, this should be completed in accordance with site licence conditions (where applicable), relevant legislation or local regulations.

Site Management must discuss the incident with the Group Manager Safety and Environment prior to contacting the external authorities.

Visy Sites in NSW must **immediately** report environmental incidents causing material harm. Note this will not include the immediate reporting of odour or noise incidents which are not deemed to have a potential to result in 'Material harm'. Form 401-7 may be used where written reports are required by Regulators. [Refer to Proc 403 – Incident and Complaint Classification.](#)

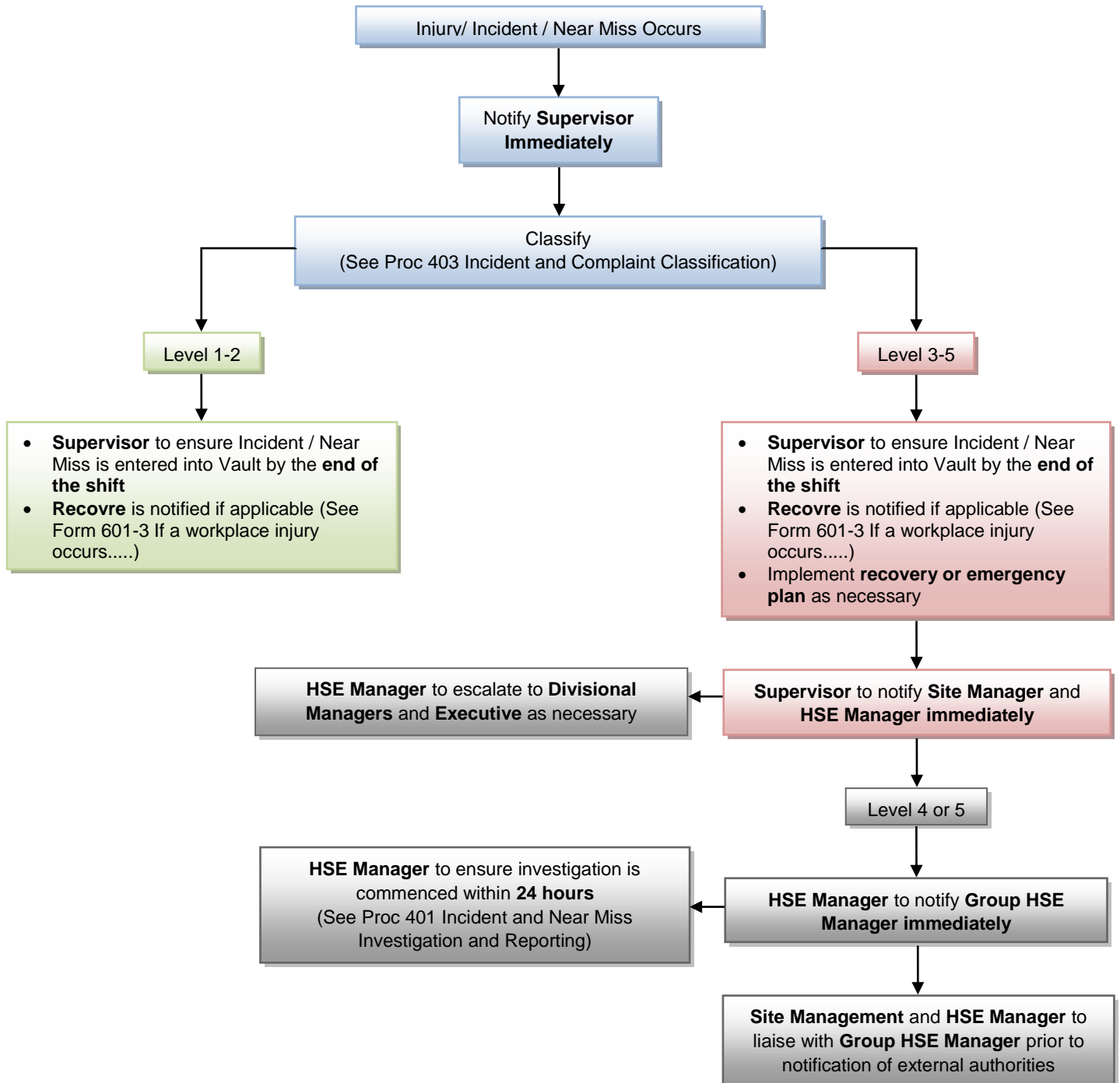
Site licence requirements may specify that complaints must be recorded and submitted in periodic reports to the authorities.

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INJURY /INCIDENT / NEAR MISS REPORTING



Tools:

PROC-VC-HSE-V403 - Incident and Complaint Classification