

Manual Section 2	Issue Date 07/22/17	Revision Date 06/15/21	Policy Number LLCP-017.1
	Incident Investigation Process		

Purpose

To guide Company personnel assisting Corporate HSE with Incident Investigations.

Scope

All LLC Companies including, Blanchard Industrial, LLC, GIS Engineering, LLC, Grand Isle Shipyard, Inc., and GWIS, Mack Steel, NuWave, Sun Industries; hereafter identified as “Company”.

Policy

It is Company policy to ensure that our employees report all incidents in which they are involved immediately to their Supervisors who are trained in First Aid & CPR as well as all incident protocols. Supervisors are to document all incidents and report them immediately to the company hotline. Following contact with the Corporate HSE on-call personnel, the Supervisor shall forward all incident reports to the Corporate HSE Department via the incident email (incident@gisy.com).

Corporate HSE will delegate an investigation team as deemed necessary by each individual incident. All team members shall be trained in their responsibilities and in proper incident investigation techniques.

The company reports to all Government Agencies as required. The company will also maintain and post incident data as required by all specific Government Agencies. This will be done by the Corporate HSE department.

Corporate HSE will verbally report all required incidents (i.e. fatalities) to OSHA within 8 hours and inpatient hospitalizations, amputations and loss of eye within 24 hours of discovery.

Initiating the Investigation

When notified of the incident, the Corporate HSE Director determines if an investigation is warranted based on the severity and preliminary information provided. If “yes”, continue with the following actions, instructions, and communications to initiate and prepare for the investigation. All investigations must be performed by the Company personnel knowledgeable in the Company policies and procedures and the Company investigation techniques. If the incident involves a Company employee at a customer location, the HSE Director communicates with the customer representative to ensure that a proper investigation takes place if needed.

Company Incident Investigation Process

1. Assign responsibilities throughout the investigation team to assure that all know exact expectations.
2. Communicate to the person notifying you to take the following steps to secure the incident site:
 - a. Assure that the incident scene is safe and secure prior to arrival.
 - b. Notify all personnel that the incident site should be isolated to prevent contamination, and that all evidence should be preserved if possible.
 - c. Equipment, tools, materials, etc. should all remain in their exact positions if possible.
 - d. If possible, rope off barricade the incident area to prevent trespass.
3. Notify the Investigation Team of the need for an investigation; all agree on a time and place to meet to begin the investigation process.
4. Ensure that adequate supplies are readily available for the investigation process. (I.e. pens, paper, recorders, PPE needed to enter site, etc.)
5. Identify any documentation or records that the Investigation Team will need to review when they arrive, and ask the person notifying you to have them ready.
6. Gather up all investigation resources and materials for the Investigation Team to use when they arrive at the incident location, and be prepared to conduct the investigation.

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Activities for the Investigating Investigation Team Members to perform when first arriving at the location:

1. Meet with the person-in-charge, and ask that person to brief the Investigation Team on what has occurred.
2. Obtain and review reports (JSEAs, Work Permits, Meetings, etc.), documents (training), written testimonials (from witnesses and others), and other pertinent paperwork (policies, regulations, etc.) relating to the incident.
3. Visit the incident area and make observations, take measurements, question personnel whom witness the incident, and perform and conduct other pertinent activities relating to the incident.
4. Take pictures of the incident area (if allowed).
5. Any other items specifically relating to the incident being investigated.

Conducting the Interviews

Familiarity with the Interview Questions found in Attachment #3 and the processes associated with investigating procedures and causal analysis are key ingredients to a successful interview. Interviews involve establishing rapport with and actively listening to the person(s) being interviewed.

1. Establishing Report
 - Help person feel comfortable at all times.
 - Develop a positive, constructive relationship with person.
 - Maintain open lines of communication between you and person.
2. Active Listening
 - Pre-Listening Guidelines
 - Eliminate potential distractions.
 - Get ready to listen.
 - Listening Guidelines
 - Pay attention to what the person is saying.
 - Pay attention to the non-verbal cues.
 - Reflect feelings as well as content.
 - Withhold evaluation.
 - Convey understanding while listening.
 - Make the shift from listener to speaker a complete one.

The interview(s) should be set up one-on-one or two-on-one, but more than two should never interview one person. Make sure the person being interviewed is comfortable and ready to share information regarding the incident (refer to Establishing Report above) during the entire session. Ask each person being interviewed each question in the list that applies; some questions may not pertain to all persons. Record their responses next to the questions, and ask each person the same questions as the previous person interviewed, to get a complete and accurate picture of what transpired. Add to the list in the spaces provided at the end of the questions.

Analyzing the Responses

Compare the responses obtained in the interviews to the list of causes to determine the basic cause category and basic causes relating to the incident. Document the causes and cause categories as the comparisons are made; continue the process until all of the responses are matched to a cause.

As you go through the comparison, you will find that causes and cause categories begin repeating themselves; the greater the frequency of repeats, the greater the likelihood that these causes and cause categories led to the incident in some way. These causes and cause categories now become the basis for determining root cause. These causes and cause categories also identify failures or deficiencies within individual health, safety and/or environmental elements and within the company's HSE Management System.

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Preparing the Report

The information found to be pertinent to the incident shall be combined with the observations made and witness statements collected in order for the Investigative Team to determine what the Root Cause of the incident. The Investigation Team and members of Corporate HSE shall meet in person to conclude the incident investigation and complete the Company RCA Summary Report.

Information collected to prepare the report should reflect the nature of the incident, contributing factors, lessons learned and recommendations to prevent future occurrences at a minimum. Once completed the report shall be submitted to Executive Management for approval. Once the RCA Summary Report obtains approval from Executive Management, the Corporate HSE Director will be responsible for the issuing of the RCA Report to the appropriate customer contact and filing the report away. All reports are to be scanned into the Company' electronic filing system and kept for future analysis.

If the results of the investigation result in a determination that specific HSE elements must be revised or re-written, or training must be conducted, or unsafe conditions must be corrected, then the HSE Management Team will present to the HSE Director the proposed corrective actions. All corrective actions shall be tracked to ensure the closure of all corrective action items found from the investigation.

Lessons Learned

Lessons learned should be reviewed and communicated through the Company Safety Alert Process. Changes to processes must be placed into effect to prevent reoccurrence or similar events. All lessons learned or changes in processes shall be communicated companywide through the Company Safety Alert Process.

Interview Questions

Events leading up to the start of the job:

1. What was the specific job to be performed? Describe.
2. Was one person designated as company designated representative of the job? List name.
3. Who was selected to perform the job? List names and companies.
4. Were the persons properly trained to perform the job? Explain.
5. Were the persons fatigued, impaired, and/or inattentive? Explain.
6. Was a JSA completed prior to the start of the job? Attach copy of JSA.
7. Were the steps, hazards, and procedures on the JSA reviewed? Explain.
8. Was the location locked and tagged prior to commencement of the job? Explain.
9. How was the job to be conducted? Describe/list steps.
10. Did job involve repetitive motion, uncomfortable positions, vibration or heavy lifting?
11. Was anything else done prior to the commencement of the job? Explain.

Events occurring during the job:

12. What instructions were given to the company designated representative during the job? Explain.
13. What instructions were given to the workers during the job? Explain.
14. Which steps of the job did you perform/were you performing? Explain.
15. Were others doing work at the same time/at the same location? Explain.
16. Was there any disagreement about who/what/when/where of the work tasks?
17. Were there any difficulties during the job? Explain.
18. Did the person have trouble recognizing what to do or how to do it? Explain.
19. Was equipment, controls, displays identified or operated improperly? Explain.
20. Was the person competent to perform the task? Explain.

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21. Was communications ever a problem during the work; was there understanding at each step in the process? Explain.
22. How long did the job take?
23. Was there manager/company designated representative pressure to hurry up the work? Explain.
24. What steps were taken to complete the job, and by whom? Describe and list names.
25. Was the procedure used correctly, incorrectly, or not used? Explain.
26. Were any steps/practices not used or in need of improvement (standard, policy, procedure, administration control, etc.)? Explain.
27. How was it determined that each part of the job was complete? Explain.
28. What were the conditions in the work area (weather, lighting, etc.)? Explain.
29. Was there a sense of the potential for failure known before the incident occurred?
30. Would an independent quality check have caught the problem? Explain.

Attachment #3 Interview Questions (continued)

Events associated with the testing (if equipment/atmosphere testing was part of the job):

31. Who decided that the equipment/atmosphere should be tested? List name.
32. How was it determined that the equipment/atmosphere would be tested? Describe
33. What instructions were given by the company designated representative to conduct the test? Explain.
34. What steps were taken to conduct the test, and who took each step? Describe list names.

The incident:

35. What was each person doing just prior to the incident? Describe.
36. Did anyone hear, smell, or feel anything unusual just prior to the incident? Explain.
37. What was each person doing when the incident occurred? Describe.
38. What actually happened? Describe in detail.
39. Were any comments made immediately after the incident about something that was done wrong or too soon or could have been done differently??? Explain.
40. Was equipment or material failure a contributing factor to the incident? Explain.
41. What is considered by each person to be the cause of the incident? Explain.

Other Questions:

42. _____
43. _____
44. _____
45. _____
46. _____
47. _____
48. _____
49. _____
50. _____

Causes

The most basic cause or causes that can reasonably be identified that management has control to fix and, when fixed, will prevent (or significantly reduce the likelihood of) the problem’s recurrence.

From the list below, select the basic cause categories and basic causes that relate to the incident, based on the information collects, observations made and interviews conducted.

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PERSONAL PERFORMANCE/BEHAVIOR

Personnel-Machine Interface:

- Labels, displays, controls need improvement
- Arrangement/placement needs improvement
- Monitoring alertness needs improvement
- Differences in how things are done
- Excessive lifting
- Tools/instruments need improvement

Work Environment:

- Housekeeping needs improvement
- Conditions, lighting, space, etc
- Noise exists
- Radiation/contamination exists
- Cramped quarters exists

System or Process is Complex

- Knowledge-based decision required
- Monitoring more than three items at once

No-Fault:

- Errors not detectable
- Errors not recoverable

Others:

- _____
- _____
- _____
- _____
- _____

IMMEDIATE SUPERVISOR

Preparation:

- No preparation
- Work place needs improvement
- Pre-job briefing needs improvement
- Walk-through needs improvement
- Lockout/tagout process needs improvement
- Scheduling process needs improvement

Selection of Workers:

- Personnel not qualified
- Personnel fatigued, upset, on drugs
- Team selection process needs improvement

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Supervision During Work:

- No supervision
- Crew teamwork needs improvement

Others:

- _____
- _____

PROCEDURES

Procedure Not Used/Not Followed:

- No procedure in place
- Procedure not available or inconvenient to use
- Procedure difficult to use
- Procedure use not required but should be

Procedure Wrong:

- Procedure wrong or did not apply
- Wrong version of procedure used

Procedure Followed Incorrectly:

- Procedure confusing
- Procedure details need improvement
- Procedure has no checklist
- Procedure checklist not used/misused

Others:

- _____
- _____

Attachment #4 Causes (continued)

TRAINING

No Training:

- Task not analyzed
- Decision not to train personnel
- Training had no learning objectives

Training Understanding Needs Improvement:

- Training lesson plan needs improvement
- Training instruction needs improvement
- Practice for repetitious work needs improvement
- Testing needs improvement
- Continuous/follow-up training needs improvement

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Others:

- _____
- _____

COMMUNICATIONS

No Communications or Communications Not Timely:

- No communications method available
- Communications were late

Turnover Process Needs Improvement:

- No standard turnover process in place
- Turnover process needs improvement

Misunderstood Verbal Communications:

- Standard terminology not used
- Communications too lengthy

Others:

- _____
- _____

Attachment #4 Causes (continued)

QUALITY CONTROL

No Inspection Performed:

- Inspection not required
- No hold point/hold point not performed

Quality Control Process Needs Improvement:

- Inspection instructions need improvement
- Inspection techniques need improvement
- Inspection process incomplete

Others:

- _____
- _____

MANAGEMENT SYSTEM

Standards, Policies, Administrative Controls Need Improvement:

- No standards, policies or administrative controls
- Standards, policies, controls not strict enough
- Standards, policies, controls confusing, incomplete
- Documents need improvement

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Standards, Policies, Administrative Controls Not Used:

- Communication of standards, policies, controls need improvement
- Standards, policies, controls recently changed
- Standards, policies, controls enforcement needs improvement
- Standards, policies, controls accountability needs improvement

Oversight/Employee Relations Needs Improvement:

- Infrequent audits and evaluations
- Audits and evaluations lack detail
- Audits and evaluations not independent
- Employee communications needs improvement
- No employee feedback

Corrective Action Process Needs Improvement:

- Corrective action needs improvement
- Corrective action not yet implemented

Others:

- _____