

Manual Section 7	Issue Date 12/21/09	Revision Date 01/01/24	Policy Number LLCP-094
	Near Miss		

Purpose

The purpose of this document is to ensure employees, supervisors and management staff correctly recognize and report “Near Miss Incidents” that can significantly improve employee safety and enhance the Company’s safety culture.

Scope

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

Definition

A Near Miss is any unplanned event that did not result in injury, illness or damage but did have the potential to do so. The Near Miss occurs only because of a fortunate break in the chain of events that prevented a possible injury, fatality or damage to property or equipment.

A faulty process or management system usually supports the root cause for the increased risk that leads to a near miss. This can be attributed to a failure of a person, process, equipment or environment to act as anticipated and therefore should be the focus of improvement.

Most lost producing events (incidents), both serious and catastrophic, are usually preceded by warnings or near miss incidents.

Best Practices

In order to ensure that Company Near Miss Reporting System is utilized to its full advantage several processes or practices should be utilized:

- Leadership must establish a reporting culture reinforcing that every opportunity to identify and control hazards, reduce risk and prevent harmful incidents must be acted on.
- The reporting system needs to be non-punitive in nature and should have an available area for contact information of the person reporting in order to be reached should further questions or clarification be needed.
- Potentially catastrophic or serious “Near Miss Incidents” should be investigated using a Root Cause Analysis (RCA) to identify the root cause and the weakness in the system that resulted in the circumstances which led to the “Near Miss Incident.”
- The results from investigations should be utilized by leadership to improve safety systems, hazard control, risk reduction and create lessons learned to be shared within the organization/workforce. All of these present an opportunity for training, feedback on performance and a commitment to continuous improvement.
- Near Miss reporting is vitally important to preventing serious, fatal and catastrophic incidents that are less frequent but far more harmful than other incidents.

The Near Miss Reporting System

Our Corporate Near Miss Reporting System has been designed to effectively:

- Capture sufficient data for statistical analysis, correlation studies, trending and performance measurement.
- Provide a convenient opportunity for “employee participation,” a basic component our Life Processes.

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- Create an open culture whereby all employees at every level share and contribute in a responsible manner to their own safety and that of their fellow workers.
- For leadership to utilize the information obtained as a leading indicator of performance used in balance with other leading and lagging measure of performance.

Reporting and Submission

All reports shall be completed accurately and submitted in a timely manner to the Corporate HSE Department. Each employee has been provided several means in order to submit the report. The below methods are allowable means of submission:

- Completion and submission of the form via e-mail to incident@gisy.com
- Completion and submission of the form via fax to (985) 475-7946

The approved report shall be completed using the Corporate “Incident-Near Miss Report Form,” which can be found on the Safety Portal.

Verification of Conformance

The Corporate HSE Director shall be tasked with the verification of adherence and identify nonconformance of the processes as designed and document within this policy. A documented verification of conformance of the “Near Miss Reporting Process” shall occur in accordance with the Corporate HSE Management Systems Process and shall be based upon the following:

- Documents and records
- Demonstrated competence at the point of execution
- Process leading and lagging metrics

The verification of conformance shall be presented to upper management at least quarterly or as deemed necessary by the Corporate HSE Director.

Record Keeping: All completed “Incident-Near Miss Forms” shall be housed within the Corporate HSE Department and disseminated as deemed necessary by the Corporate HSE Director.

Incident Level Assignment for Injuries, Illnesses and Near Misses

The Company utilizes a four tier level approach to classify injuries, illnesses or near misses. The below table outlines a description of each.

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Please note that for the purpose of near miss incidents the incident should be assigned to level of which the event presented the most appropriate potential.

Type	Level 1	Level 2	Level 3	Level 4
Injury	First-Aid	Recordable Injury DAFW Injury or Restricted Duty	Injury requiring overnight hospitalization other than observation. Multiple recordable injuries	Work related fatality. Injury of multiple employees requiring overnight hospitalization other than observation
Illness	Work-Related Illness	Chemical or other severe work related illness	Illness requiring overnight hospitalization other than observation	Work related fatality. Illness of multiple employees requiring overnight hospitalization other than observation
Equipment or Property Damage	Minor equipment or Property Damage	Serious equipment or Property Damage	Damage to equipment or property requiring major repair or discontinued use	Complete destruction of equipment or property
Near Miss	Potential of any of the above	Potential of any of the above	Potential of any of the above	Potential of any of the above

Other Goals of the Near Miss Policy

The Corporate HSE Department shall also ensure that besides adherence to the policy stated above the following is also created, implemented and maintained:

- This policy and procedure is communicated to all employees with the backing of senior management.
- The promotion of a culture of reporting all incidents no matter how minor with the support and help of all managers and supervisors.
- Educate employees on the reason why near miss reporting is a necessity, the important role that they play, and the process for reporting.
- Ensure the near miss reporting process is easy to understand and use.
- Continue to communicate on the importance of near miss reporting encouraging the participation of all employees.
- Use the near miss reporting as a leading indicator and report back to the senior management regarding the positive steps taken to improve workplace safety.