

# APPENDIX A: SAMPLE HAZARD AND INCIDENT REPORTING POLICY

# PURPOSE OF THIS TOOL

The purpose of this tool is to provide hospital, long-term care, and home and community care workplaces with a sample hazard and incident reporting policy, including those related to workplace violence. It serves as a guide for creating or updating a policy to ensure compliance with legislative requirements.

# WHO USES THIS TOOL

All workplace parties involved in hazard and incident policy and procedure development, revisions, and evaluation. All workers to whom the policy pertains, must read, understand, and adhere to the policy and its procedures as required.

# HOW TO USE THIS TOOL

This is a sample policy. Modify it as needed to your workplace needs. Establish the policy in consultation with the Joint Health and Safety Committee or Health and Safety Representative. Carefully consider revisions, as significant changes may negatively impact worker safety.





# HAZARD AND INCIDENT REPORTING POLICY

MANUAL:	SUBJECT:	POLICY NUMBER:			
Health and Safety	Hazard and Incident Reporting				
EFFECTIVE DATE:	REVISED DATE:	NEXT REVIEW DATE:			
POLICY REVIEWERS:					
APPROVED BY:					
SENIOR LEADERSHIP SIGNATURE (e.g., CEO or Executive Director):		JHSC/HSR SIGNATURE:			

# **Purpose**

The policy guides all workplace parties reporting hazards and incidents, ensuring strict compliance with the legislative requirements. Timely reporting of hazards and incidents facilitates:

- Prompt care of physically and/or psychologically injured workers following an incident,
- Timely investigations and corrective actions.
- Effective tracking and trending of hazard and incident reporting to enhance identification of potential workplace violence risks and to eliminate and/or control these risks.

Reporting of all hazards and incidents is the first step in preventing future occurrences.

# **Policy statement**

<Name of Organization> acknowledges the organization's responsibility to establish measures and procedures for workers to report incidents to a supervisor or employer. We further recognize, as per the Occupational Health and Safety Act (OHSA), the duty to take every precaution reasonable in the circumstances to protect workers.

<Name of Organization> is committed to establishing, implementing, and maintaining a hazard and incident reporting process. All staff must promptly report hazards and incidents and complete the necessary forms, if able. Where a worker is unable to complete the forms, an alternate person may complete them. Supervisors will respond promptly to all reports, initiating investigations and taking necessary corrective actions.

Incidents that are to be reported include:

• Near miss incidents





Appendix A: Sample Hazard and Incident Reporting Policy

- No harm incidents
- Harmful incidents e.g., psychological and/or physical injury/illness incidents.

All staff will receive training on this policy, its procedure, and the reporting methods (e.g., use of document and/or electronic forms). An annual evaluation of the hazard and incident reporting policy and procedure will be conducted in consultation with stakeholders, including the JHSC and/or HSR. Approved quality improvements will be implemented and communicated to workplace parties in a timely manner.

# Scope

This policy applies to all workers (staff) in the organization.

#### **Definitions**

**Critical injury:** Is an occupational injury of a serious nature that, based on Ontario Regulation 420/21 under the OHSA:

- 1. Places life in jeopardy.
- 2. Produces unconsciousness.
- 3. Results in substantial loss of blood.
- 4. Involves a fracture or a leg or arm, but not finger or toe.
- 5. Involves the amputation of a leg, arm, hand, or foot but not finger or toe.
- 6. Consists of burns to a major portion of the body.
- 7. Causes loss of sight in an eye.

Fatality: Death due to causes in the workplace.

**First Aid:** First aid is the one-time treatment or care and any follow-up visit(s) for observation purposes only. First aid includes, but is not limited to: cleaning minor cuts, scrapes, or scratches; treating a minor burn; applying bandages and/or dressings; applying a cold compress, cold pack, or ice bag; applying a splint; changing a bandage or a dressing after a follow-up observation visit (WSIB, n.d.).

**Harm:** An impairment of structure or function of the body and/or any deleterious effect arising there from. Harm includes disease, injury, suffering, disability, and/or death. (Canadian Patient Safety Institute, 2012)

**Hazard:** A circumstance, agent, or action with the potential to cause harm. (Canadian Patient Safety Institute, 2012)

**Health Care:** Medical or healthcare professional intervention e.g., doctor, nurse practitioner, dentist, physiotherapist, chiropractor. The worker returns to work on their next scheduled shift. (WSIB)

**Incident:** An occurrence, condition, or situation arising in the course of work that resulted in, or could have resulted injuries, illnesses, damage to health or fatalities. (Canada Standard Association, 2017)

- a) **Near miss Incident:** An incident that <u>does not reach or make contact</u> with a worker and does not result in harm to worker's health and safety.
- b) **No Harm Incident:** An incident that <u>reaches or makes contact</u> with a worker but does not result in harm to a worker's health and safety.
- c) Harmful Incident: An incident that <u>reaches or makes contact</u> with a worker and does result harm to a worker's health and safety.

Lost Time: Absence from work beyond the date of the work-related injury/illness that requires medical attention and/or results in a wage loss. (WSIB)





Appendix A: Sample Hazard and Incident Reporting Policy

**Occupational Injury:** An occurrence which is neither expected nor planned, resulting in personal injury and/or property damage due to an exposure or conditions at the workplace.

**Occupational Illness:** Refers to a condition that results from exposure in a workplace to a psychological trauma or a physical, chemical, or biological agent to the extent that normal physiological mechanisms are affected, and the health of the worker is impaired.

Physical Injury: Bodily harm resulting from an incident.

Psychological Injury or Illness: Mental harm resulting from an incident.

Workplace violence (OHSA):

- a) Exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker.
- b) An attempt to exercise physical force against a worker, in a workplace that could cause physical injury to the worker.
- c) A statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker.

# **Roles and Responsibilities**

## Board of Directors:

• Take all reasonable care to ensure that the corporation complies with the OHSA and its regulations and with any orders and requirement from the Ministry of Labour, Immigration, Training, and Skills Development (MLITSD) inspectors, Directors, and Minister

#### Employer:

- Ensure provision of human and fiscal resources for the development, implementation and maintenance of a hazard and incident reporting policy, measures, and procedures; and appoint a leader to oversee the process and evaluation.
- Ensure all staff receive training and understand the hazard and incident reporting measures and procedures.
- Ensure legislative requirements are met for:
  - Workplace violence reporting per OHSA section 28, and 32.0.2
  - Internal and external notifications to the JHSC and/or HSR, Trade Union and if required MLITSD, OHSA sections 51, 52
  - Ontario Regulation 420/21 Notices and Reports Under Section 51-53.1 of the Act -Fatalities,
     Critical Injuries, Occupational Illnesses and Other Incidents
  - o Provision of occupational health and safety reports to the JHSC and/or HSR per OHSA section 25(2)(I)(m), including those related to workplace violence hazards or incidents
  - Health and Safety consultations with the JHSC and/or HSR as per the OHSA section 25(2) and HCRFR 8 and 9
  - Responding to JHSC and/or HSR recommendations OHSA section 9(20) within 21 days including those related to workplace violence
  - o First Aid Regulation 1101 under the Workplace Safety and Insurance Act
  - Workplace Safety and Insurance Act (WSIA) requirement to report injury and illnesses within three business days
- Annually review and evaluate the workplace hazard and incident reporting processes in consultation with the JHSC and/or HSR and stakeholders.
- Ensure necessary quality improvements are implemented as required and communicate any changes and improvements to those that are affected.





Appendix A: Sample Hazard and Incident Reporting Policy

- Enforcement of the workplace hazard and incident reporting policies and procedures.
- Promote and encourage a culture of safety and workplace hazard and incident reporting.
- Take every precaution reasonable in the circumstances, for the protection of the workers.

#### Supervisor:

- Ensure the policy, measures, and procedures are implemented in the areas under their authority.
- Be familiar with applicable health and safety legislation and demonstrate occupational health and safety supervisor competency.
- Attend hazards and incident reporting training and understand responsibilities.
- Ensure workers under their authority attend hazard and incident reporting training; and understand their responsibilities for reporting and how to do it, including hazards and incidents related to workplace violence.
- Ensure prompt and accurate completion and submission of hazard and incident reporting forms to the appropriate individual(s) as per policy and procedures.
- Enforce workplace violence incident reporting policy, measures, and procedures.
- Communicate any changes in policy, measures, or procedures.
- Ensure maintenance of training records e.g., scope and content, date, length of training, signatures, and evaluation of understanding.
- Promote and encourage a culture of safety and hazard and incident reporting.
- Take every precaution reasonable in the circumstances for the protection of workers.

#### Worker:

- Attend required hazard and incident reporting training and complete proof of attendance.
- Follow the reporting policies, measures, and procedures as required.
- Report all hazards and incidents promptly to their supervisor and complete the necessary forms as able and within the time limits required, including hazards and incidents related to workplace violence.

#### Joint Health and Safety Committee / Health and Safety Representative:

- Be consulted in the development and revisions of the workplace reporting policies, measures, procedures, and training.
- Receive accident/illness notifications as prescribed in the OHSA and Reg.420/21 e.g., are notified of critical injuries immediately and notified of disabling injuries within 4 days and receive reports as required
- Promote and encourage workers to promptly report hazards and incidents to their supervisors and/or employers, including hazards and incidents related to workplace violence.
- Make recommendations for improvement in writing to management as needed.

#### Occupational Health and Safety Administrator or Delegate(s):

- Responsible for oversight of the workplace violence hazard and incident reporting processes.
- Develop and revise the hazard and incident reporting policy, measures, and procedures as needed.
- Ensure internal and external notifications are conducted, completed, and documented e.g., management, MLITSD, JHSC/HSR, Trade Unions.
- Oversee hazard and incident report data monitoring, review, evaluation and develop recommendations for improvement as required for senior management.
- Develop regular reports to management and JHSC/HSR.
- Provide communications to management, workers and JHSC/HSR regarding quality improvement changes.



Appendix A: Sample Hazard and Incident Reporting Policy

# **Procedures**

## Hazard Reporting

- 1. Any worker who identifies a workplace violence hazard must report it to their supervisor and complete a workplace violence hazard form and submit it to their supervisor.
- 2. Supervisors must review the hazard report in a timely manner; investigate the hazard as per the investigation policy and procedure to identify root causes; and implement and communicate corrective actions in a timely manner to all affected workers. Remedial actions must address the findings and root causes of the investigation. Refer to the Workplace Violence Investigation Toolkit for more information.
- 3. Where procedures are in place, proactive reporting or notification of high-risk potential hazards followed by immediate summoning of assistance of a supervisor and/or others such as security are encouraged. This is to initiate a prompt response with the intent of preventing an incident from occurring.
- 4. See Appendix B Sample Workplace Violence Hazard Report Form.

## Incident Reporting

- 1. Incidents must be reported to the supervisor or delegate as soon as possible. This includes incidents such as near miss, no harm incident; and harmful incidents (please see definitions).
- 2. It is important that all incidents, including incidents related to workplace violence, are reported so that investigations are conducted, and preventive measures are taken to prevent future incidents.
- 3. Workers are to seek or obtain first aid or healthcare aid, if required. The supervisor or delegate shall ensure worker receives the care required.
- 4. The person reporting the incident who is usually the injured worker must complete the incident/injury description portion of the report as soon as safely and physically possible. Where a worker is incapable of doing so, a delegate may complete the report to the best of their ability. The incident report includes the following information:

## **Section A - Incident Report Content**

- Person reporting information, date, and time of incident.
- Type of Incident, e.g., near miss, no harm, harmful incident.
- Source of workplace violence, for workplace violence incidences, e.g., Type 1-4.
- Information on the subject causing workplace incident, description of the behaviour (e.g., intentional violence or non-intentional responsive behaviour, verbal threat, written treat, weapon threat, threatening gestures, etc.
- Location of Incident.
- Frequency of incident e.g., first time or repeat occurrence.
- Detailed description of incident.
- Factors leading to the incident and how could it be prevented (worker).
- Witness list and contact information, if known.
- Immediate actions taken if known, e.g., summon immediate assistance; emergency code called; immediate emergency notifications made such as security, police, etc.; other specify.

## Section B - Injury Report Description

- Personal information of injured worker
- Type of Injury/Illness, e.g., physical, psychological
- Injured body part
- Nature of injury



Appendix A: Sample Hazard and Incident Reporting Policy

- Onset
- Critical or Fatal Injury
- WSIB First Aid, Healthcare Aid, Lost Time
- Return to Work status

# Section C - Health and Safety Notifications

- Notification of critical and fatal Injury
- Notification of violence causing disabling injury
- Notification of occupational illness or claim for occupational illness has been filed with Workplace Safety Insurance Board (WSIB)
- Report to police Criminal activity

The incident report must be submitted to the supervisor or their alternate as soon as possible for completion and follow up. The supervisor shall review the report for completeness to the best of their ability and, if required, with assistance from the worker and then submit it to the Occupational Health and Safety Administrator or delegate who oversees the reporting processes.

5. The Occupational Health and Safety Administrator or Designate reviews the report information for completeness and ensures the internal and external verbal and written notifications are communicated to the relevant parties in compliance with OHSA. Notifications are legislated and time sensitive. See chart below. The prescribed content requirement of the notice or report can also be found in Ontario Regulation 420/21, s.3.

## Legislated Notifications under the OHSA

Type of Notice (OHSA)	Description	Required Notification
Death or critical injury	Person is killed or critically injured (see definition)	Employer shall notify immediately the:  a) MLITSD b) JHSC/HSR, and c) Trade Union if any.  Provide a written report within 48 hours to the parties.  OHSA Section 51(1)
Accident, explosion, fire or incident of workplace violence causing injury	Person is disabled from performing his or her usual work or requires medical attention because of an accident, explosion fire or incident of workplace violence at a workplace but no one dies or is critically injured because of the occurrence.	Employer shall report within 4 days of the occurrence, give written notice of the occurrence to the:  a) JHSC/HSR b) Trade Union if any c) MLITSD Director if an inspector requires notification of the Director.  OHSA Section 52(1)





Appendix A: Sample Hazard and Incident Reporting Policy

Note of occupational illness e.g., post-traumatic stress disorder

If an employer is advised by or on behalf of a worker that the worker has an occupational illness or that a claim in respect of an occupational illness has been filed with Workplace Safety and Insurance Board by or on behalf of a worker

Employer shall notify in writing within 4 days of being advised, to:

- a) MLITSD Director
- b) JHSC/HSR, and
- c) Trade Union.

OHSA Section 52(2)

- 6. If the worker loses time off work or sees a physician or healthcare provider for care for the workplace injury or illness, the Occupational Health and Safety Administrator, Human Resources, or designate will complete and submit a WSIB Form 7 within three working days of being advised of the injury or illness. Refer to the organization's WSIB Claims Management and Return to Work Policy and Procedure.
- 7. Where hazard and incident reporting logs for workplace violence are available in a department, workers should also document the hazard or incident into the log. Supervisors and management will review the logs for department trends and implement corrective actions. The JHSC/HSR have the right to review the information of the logs, providing patient confidentiality is protected. See sample hazard and incident log in Appendix D.

# Administration of Incident Reports

- 1. The Occupational Health and Safety Administrator or delegate will ensure incident reports are completed and is responsible to inform investigation personnel and/or team.
- 2. Incident reports will be tracked and reviewed for trends and, where appropriate, for the development of recommendations and quality improvements. This information will be shared with stakeholders including the JHSC/HSR and others.
- 3. For incidents of workplace violence in work settings where there is a higher risk, the following topics and indicators should be considered to assisting with tracking and trending:

# Potential Tracking/Trending Topics and Indicators

- 1 Number of incidents:
  - # incidents causing injury (contact occurred), e.g., physical / psychological harm (injury/illness) # incidents with no injury/illness, e.g., near misses (no contact occurred) and no harm (contact occurred)
- 2 Source of workplace violence
  - # Type 1 External Perpetrator
  - # Type 2 Client/Customer/Care Recipient
  - # Type 3 Employment Related
  - # Type 4 Domestic Violence
- 3 Summary of incident demographics location and department, time of incidents, work activities at the time of the incident, worker's job position/title
- 4 Type of behaviour causing injury
  - # intentional violence





Appendix A: Sample Hazard and Incident Reporting Policy

	# non-intentional responsive behaviour					
5	Workplace violence or responsive behaviour stratified:					
	<pre># verbal threat # written threat # weapon threat # threatening gestures # kicking # spitting</pre>	# choking # grabbing and pinching # hitting, slapping and punching # pushing / pulling # throwing objects # scratching	# head butting # sexual assaults # weapon assaults # Other, specify			
6	Summary of Immediate actions taken:					
	# of incidents that summon immediate assistance e.g., call for help, phone for help, use of panic alarm or personal safety response system # of emergency codes called e.g., code white and outcomes (injury/illness or no injury/illness) # of emergency notifications made e.g., security, police, emergency services or others # of 'use of force' incidents # other, specify					
7	Summary of common factors that lead to the workplace violence incident, e.g., lack of training, inadequate patient assessment or care plan, triggers not identified, inability to summon immediate assistance, lack of risk communication prior to activities such as transition of care or transport etc.					
8	Frequency of incidents, e.g., # of first-time occurrences and # of repeat occurrence					

#### Communication

The employer, supervisor and/or occupational health and safety administrator will communicate the hazard and incident policy, measures, procedures, and any changes to workers using the following methods:

- Staff meeting
- Posters
- Newsletters
- Email notifications

#### **Training**

All staff will receive workplace hazard and incident reporting training at the time of new hire orientation. Regular reviews will be provided during routine department training. Training records will be maintained by Human Resources and/or supervisor. Training will include:

- Policy, measures, and procedures
- Roles and responsibilities
- Time sensitivity of reporting and notifications
- Promoting a culture of reporting hazards and incidents, including those related to workplace violence
- Completion of report forms and documentation requirements e.g., online reporting and/or written





Appendix A: Sample Hazard and Incident Reporting Policy

# **Evaluation**

The Employer will evaluate and review this policy, measures, and procedures annually and, if necessary, revise it in consultation with stakeholders and JHSC/HSR. Approved quality improvements will be implemented according to an implementation plan and communicated to management and workers in a timely manner.

#### **Cross Reference Policies and Procedures**

- Critical and Fatal injury procedures
- Workplace Safety and Insurance Board (WSIB) Reporting and Return to Work procedures
- JHSC/HSR terms of reference
- Code White Procedures
- Security Procedures

Signature:			
(President, CEO, Administrator, Executive D	irector)		
Date:			
Date of JHSC Consultation:		_	
References:			
Occupational Health and Safety Act R.S.O. 1	1990		

Occupational Health and Safety Act R.S.O. 1990
Notices and Reports Under Sections 51 to 53.1 of the Act – Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents Ontario Regulation 420/21
Healthcare Section 21 Guidance Notes #6 & #8
Workplace Safety and Insurance Act

