

ACCIDENT INVESTIGATION AND REPORTING

MAJOR TOPICS

- ▶ Types of Accident Investigations
- ▶ When to Investigate
- ▶ What to Investigate
- ▶ Who Should Investigate
- ▶ Conducting the Investigation
- ▶ Interviewing Witnesses
- ▶ Reporting Accidents
- ▶ Ten Accident Investigation Mistakes to Avoid

An *accident* is any unplanned event that interrupts the completion of activity and that may or may not involve human injury or property damage. The term *incident* refers to that did not cause injury or property damage but had the potential to. The term “near miss” is sometimes used in place of the term “incident.”¹ When accidents occur in the workplace, they should be investigated. Reasons for conducting accident investigations include the following:

- Determine the cause so that future accidents can be prevented
- Fulfill any applicable legal and/or regulatory requirements
- Determine the cost of the accident
- Determine compliance with applicable safety regulations
- Provide information for processing workers’ compensation claims²

This chapter gives prospective and practicing safety and health professionals the information they need to conduct thorough, effective accident investigations and prepare comprehensive accident reports.

TYPES OF ACCIDENT INVESTIGATIONS

There are *accident reports* and there are *accident-analysis reports*. An **accident report** is completed when the accident in question represents only a minor incident. It answers the following questions: *who*, *what*, *where*, and *when*. However, it does not answer the *why* question.³ An accident report can be completed by a person with very little formal investigation and reporting training or experience. Supervisors often complete accident reports which, in turn, might be used later as part one of a more in-depth accident report. The Occupational Safety and Health Administration’s (OSHA’s) Form 301 can be used for accident reports (Figure 8-1).

Figure 8-1 is OSHA’s Form 301—“Injury and Illness Incident Report.” Although organizations may develop customized accident report forms (as explained later in this chapter), Form 301 is required any time a recordable work-related injury or illness occurs. Hence, Form 301 is to be used even if an organization develops a more comprehensive accident report form that calls for more comprehensive information.

OSHA's Form 301 Injury and Illness Incident Report

This *Injury and Illness Incident Report* is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the *Log of Work-Related Injuries and Illnesses* and the accompanying *Summary*, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

According to Public Law 91-596 and 29 CFR 1904, OSHA's recordkeeping rule, you must keep this form on file for 5 years following the year to which it pertains.

If you need additional copies of this form, you may photocopy and use as many as you need.

Completed by _____

Title _____

Phone (____) _____ Date ____/____/____

Public reporting burden for this collection of information is estimated to average 22 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Persons are not required to respond to the collection of information unless it displays a current valid OMB control number. If you have any comments about this estimate or any other aspects of this data collection, including suggestions for reducing this burden, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

FIGURE 8-1 OSHA's Form 301.



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Information about the employee

- 1) Full name _____
- 2) Street _____
City _____ State _____ ZIP _____
- 3) Date of birth ____/____/____
- 4) Date hired ____/____/____
- 5) ☐ Male ☐ Female

Information about the physician or other health care professional

- 6) Name of physician or other health care professional _____
Facility _____
- 7) If treatment was given away from the worksite, where was it given?
Street _____
City _____ State _____ ZIP _____
- 8) Was employee treated in an emergency room?
☐ Yes ☐ No
- 9) Was employee hospitalized overnight as an in-patient?
☐ Yes ☐ No

Information about the case

- 10) Case number from the Log _____ (Transfer the case number from the Log after you record the case.)
- 11) Date of injury or illness ____/____/____
- 12) Time employee began work ____ AM / PM
- 13) Time of event ____ AM / PM ☐ Check if time cannot be determined
- 14) **What was the employee doing just before the incident occurred?** Describe the activity, as well as the tools, equipment, or material the employee was using. Be specific. Examples: "climbing a ladder while carrying roofing materials"; "spraying chlorine from hand sprayer"; "daily computer key-entry."
- 15) **What happened?** Tell us how the injury occurred. Examples: "When ladder slipped on wet floor, worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement"; "Worker developed soreness in wrist over time."
- 16) **What was the injury or illness?** Tell us the part of the body that was affected and how it was affected; be more specific than "hurt," "pain," or "sore." Examples: "strained back"; "chemical burn, hand"; "carpal tunnel syndrome."
- 17) **What object or substance directly harmed the employee?** Examples: "concrete floor"; "chlorine"; "radial arm saw." If this question does not apply to the incident, leave it blank.
- 18) **If the employee died, when did death occur?** Date of death ____/____/____

An **accident-analysis report** is completed when the accident in question is serious. This level of report should answer the same questions as the regular accident report plus one more—*why*. Consequently, it involves a formal accident analysis. The analysis is undertaken for the purpose of determining the root cause of the accident. Accident analysis requires special skills and should be undertaken only by an individual with those skills. There are two reasons for this. First, the accident analysis must identify the actual root cause or the company will expend resources treating only symptoms or, even worse, solving the wrong problem. Second, serious accidents are always accompanied by the potential for litigation. If there might be legal action as a result of an accident, it is important to have a professional conduct the investigation even if it means bringing in an outside consultant.

How can safety and health professionals determine when an accident report is sufficient and when an accident-analysis report is called for? Accident reports are called for when the accident in question is a minor incident that did *not* result in any of the following circumstances: death, loss of consciousness, medical treatment beyond first aid, more than one additional day of lost work beyond the day of the accident, or any kind of modifications to the injured employee's work duties beyond those that might occur on the day of the accident.

Accident-analysis reports are called for when any of the following circumstances result from the accident in question: death, loss of consciousness, professional medical treatment beyond first aid, one or more days of lost work over and above any time lost beyond the day of the accident, or any modifications to the injured employee's work duties beyond those that might occur on the day of the injury.

WHEN TO INVESTIGATE

Of course, the first thing to do when an accident takes place is to implement **emergency procedures**. This involves bringing the situation under control and caring for the injured worker. As soon as all emergency procedures have been accomplished, the accident investigation should begin. Waiting too long to complete an investigation can harm the results. This is an important rule of thumb to remember. Another is that *all* accidents, no matter how small, should be investigated. **Evidence** suggests that the same factors that cause minor accidents cause major accidents.⁴ Further, a near miss should be treated like an accident and investigated thoroughly.

There are several reasons why it is important to conduct investigations immediately. First, immediate investigations are more likely to produce accurate information. Conversely, the longer the time span between an accident and an investigation, the greater the likelihood of important facts becoming blurred as memories fade. Second, it is important to collect information before the accident scene is changed and before witnesses begin comparing notes. Human nature encourages people to change their stories to agree with those of other witnesses.⁵ Finally, an immediate investigation is evidence of management's commitment to preventing future accidents. An immediate response shows that management cares.⁶

WHAT TO INVESTIGATE

The purpose of an **accident investigation** is to collect facts. It is not to find fault. It is important that safety and health professionals make this distinction known to all involved. **Fault finding** can cause reticence among witnesses who have valuable information to share. **Causes** of the accident should be the primary focus. The investigation should be guided by the following words: **who, what, when, where, why, and how**.

This does not mean that mistakes and breaches of precautionary procedures by workers go unnoted. Rather, when these things are noted, they are recorded as facts instead of faults. If fault must be assigned, that should come later, after all the facts are in.⁷

In attempting to find the facts and identify causes, certain questions should be asked, regardless of the nature of the accident:

- What type of work was the injured person doing?
- Exactly what was the injured person doing or trying to do at the time of the accident?