



Policies and regulations

**PR-009**

**Accident investigation and analysis procedure**

March 2020

## Preamble and scope of application

SIRIUSMEDx is committed to the safety of its employees. The purpose of this procedure is to establish a consistent accident investigation and analysis process. Managers will be asked to investigate and analyze certain occurrences that meet the conditions for investigation set by management with an emphasis on corrective action.

This procedure is intended for anyone who reports or witnesses an event, as well as managers and individuals involved in the investigation.

## Definitions

|                               |  |
|-------------------------------|--|
| <b>Workplace accidents</b>    | An unforeseen and sudden event attributable to any cause, occurring to a person by reason of or in the course of his or her employment and resulting in an employment injury to that person <sup>1</sup>   |
| <b>Accident analysis</b>      | A process that consists of organizing and ordering the facts and that allows the identification of the cause(s) of an event (or an accident) as well as the corrective measures that are required within a controlled framework.                             |
| <b>Injury (physical)</b>      | Injury done accidentally to living tissue by an external cause.  |
| <b>Injury (psychological)</b> | Moral suffering felt by an individual.   |
| <b>Customer</b>               | A customer is an individual or entity that has a business relationship with SIRIUSMEDx. For the purposes of this policy, a customer is either a course participant, a patient in a medical support project, or a person receiving services from the company. |
| <b>Material damage</b>        | Damage to premises, equipment (e.g. machinery, furniture, work tools...) or property (building...).  |
| <b>Event</b>                  | Situation such as a work accident, occupational disease, miscellaneous ailment or incident.  |

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<sup>1</sup> <http://legisquebec.gouv.qc.ca/fr/ShowDoc/cs/A-3.001>

**Serious Event**

An event as stipulated by section 62 of the Occupational Health and Safety Act<sup>2</sup>. These events are: the death of a worker, the total or partial loss of a limb or of the use of this limb for a worker as well as a major physical trauma. Major events also include injuries to several workers who will not be able to perform their duties for one working day and property damage of \$150,000 or more.

**Fact**

Verifiable, measurable and indisputable information that describes an event. It is reality as opposed to interpretation, personal opinion or judgments.

**Accident Form**

A number of official documents that describe the actions of one or more persons, following events such as: an accident resulting in injury or damage, a violation of a law or regulation, a criminal act, etc.<sup>3</sup>

**ManagerFor the purposes of**

this policy, a manager is a person in a supervisory, managerial or advisory role who has a reporting relationship to employees or the ability to represent the organization.

**Incident**

A fact or event of a secondary nature, usually untoward, that occurs in the course of an action and may disrupt the normal course of the action. Can also be defined as an event that may have caused injury or damage.<sup>4</sup>

**InstructorThis is**

a natural person mandated by the company as a self-employed person to provide training certified by the company.

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<sup>2</sup> Act respecting occupational health and safety, R.S.Q., c. S-2.1

<sup>3</sup> [https://www.ccdmd.qc.ca/media/Genres\\_06Lerapportdintervention.pdf](https://www.ccdmd.qc.ca/media/Genres_06Lerapportdintervention.pdf)

<sup>4</sup> <https://www.larousse.fr/dictionnaires/francais/incident/42245>

|                                      |   |
|--------------------------------------|---|
| <b>Occupational Injury</b>           | An injury or illness arising out of or in connection with an industrial accident, or an occupational disease, including recurrence, relapse or aggravation  |
| <b>Occupational disease</b>          | A disease contracted by reason of or in the course of work and which is characteristic of that work or directly related to the particular hazards of that work  |
| <b>Hazardous material</b>            | A material which, because of its properties, constitutes a danger to the health, safety or physical integrity of a worker, including a hazardous product  |
| <b>Miscellaneous aches and pains</b> | Discomfort resulting in a temporary inability to perform daily tasks (e.g. discomfort, pressure drop, stomach ache, etc.)   |
| <b>Wellness</b>                      | A state related to different factors considered separately or together (e.g. health, social or economic success, pleasure, self-actualization, harmony with oneself and others, etc.).  |
| <b>Medical Support Staff</b>         | Medical support personnel include any employee working for the company who performs clinical functions on any of the projects. These employees may include, but are not limited to, a first responder, paramedic, nurse, physician...                             |
| <b>Incident Log:</b>                 | The accident log is a document in which the employer must record workplace accidents, as well as near misses, that occur in their facility. It is therefore one of the main indicators of your workplace's occupational health and safety situation. <sup>5</sup> |

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<sup>5</sup> <https://formationsst.csn.info/registre-daccidents/quest-ce-quun-registre-daccidents/>

**Health** A state of complete physical, mental and social well-being and not merely the absence of disease or infirmity <sup>6</sup>

**Subcontractor:** It is a natural or legal person who carries out a work entrusted by the company.

## Objectives

The objective of this procedure is to allow an analysis of accidents that occur involving the organization. This procedure aims to collect factual data as well as to identify the different causes of work accidents and recurring or non-recurring events that have caused damage. Once the causes have been identified, recommendations can be made regarding corrective measures to be taken to prevent a similar situation from recurring while working to eliminate the dangers or risks at the source.

This procedure applies to all persons who report an event or who are directly or indirectly concerned by an incident. It also applies to those who will be responsible for the investigation, the analysis of the facts and the corrective measures to be taken.

## Principles of an accident investigation or analysis

In order to determine the cause of an accident or incident, it is essential to follow a certain process.

The following principles should be applied during the process:

### Investigating incidents

It is very important to investigate events that are undesirable or repetitive, even if the consequences of the events are minor. These events can disrupt the normal course of the organization's operations and could eventually lead to more adverse consequences.

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<sup>6</sup> <https://fr.wikipedia.org/wiki/Santé>

Managers will ensure that minor incidents that come to their attention are handled through the process determined by management. Incidents that require a full investigation (either because of repetition or severity) will be referred to the designated management.

#### Requirements for starting an accident investigation and analysis

When an event occurs, it is necessary to conduct an accident investigation and analysis to determine the cause(s) and to apply, if necessary, the appropriate corrective measures.

Upon learning of an event report, the manager is called upon to initiate an investigation according to the conditions determined.

However, the process must be initiated only if the event is one of the following (which ensures compliance with the obligations of section 62 of the Occupational Health and Safety Act):

- In the case of an employee or collaborator: when an accident causes a work stoppage or when it disrupts the normal course of operations;
- In the case of a client: when an accident results in the interruption of training (participant) or work (patient) for the person concerned;
- For other events, an investigation may be carried out at the initiative of management depending on the nature of the risk.

#### Observations and opening of the file

To the extent that it is possible to do so, the investigation should be conducted at the scene of the accident. In this way, the people involved in the accident can better explain what happened. It is also much easier to determine the environmental factors that may have contributed to the accident and to accurately describe the location and circumstances that led to the event.

The investigation should begin as soon as possible after the accident to ensure the greatest reliability of testimony while ensuring that the scene of the accident is changed as little as possible.

### Analyze the places

It is essential to ensure that the site is safe at the time of reporting. If not, temporarily stop the operations and equipment involved and limit access to the affected area during the investigation. The premises should not be altered until the investigation is finalized.

It is recommended that photos be taken of the work area or items that may have played a role in the accident to document the case for future reference. The position of the accident victim can also be simulated to further understand what happened. It is also recommended that measurements of the space and various objects be taken so that a scale sketch of the accident scene can be reproduced in the report.

## Investigation and analysis process

### **1. Identify the victim or witness**

Enter information to identify the person(s) reporting the event and to specify elements of their role. The information collected must be kept confidential.

### **2. Describe the reported event**

At this stage, the details of the event must be described in order to situate it in time and space, while specifying to whom the event was reported and whether any action was taken (first aid, protective measures, etc.).

### **3. Provide details of injury or property damage**

At this stage, the nature or location of the various injuries and property damage, if any, should be identified.

### **4. Investigate the accident**

Where relevant, add any relevant documents to your survey report. The following are the different parts of the survey:



- **Question the victim:** Meet the victim, when possible, in a suitable location that is conducive to discussion. If the person is able to do so, guide them to the scene of the accident to explain what happened and to allow the investigator to visualize it.
- **Gather important information:** time, equipment, location, victims, witnesses, task(s), organization...
- **Question the witnesses:** Meet and go to the scene of the accident with each of the witnesses, if possible, to understand and visualize what happened. It is important to collect only the facts.
- **Question others:** if there are others involved in the accident or who may have additional information to further the investigation.
- **Develop the sequence:** describe in an orderly and chronological sequence all the facts that led to the accident or incident in order to determine the failures or shortcomings as well as the undesired situations that led to the event.

## 5. Analyze the facts related to the accident

It is recommended that the analysis be done immediately after the investigation. When there is a longer delay between the two steps, some things can be forgotten, the analysis report will take longer to produce and there could be consequences on the organization or even in the implementation of corrective measures.

- **Identify accident factors:** Accident factors that may be related to time, equipment, place, individual, task or organization must be determined. It is recommended to seek the collaboration of experienced and/or competent person(s) in the field. This would allow us to provide a better argued and objective answer.
- **Determine the causes of the accident:** If applicable, the problem must be placed in context and the cause(s) of the discrepancy between the desired and undesired situation must be determined. Consider why, at the time of the accident, the situation involved this undesirable situation rather than the normal situation, while demonstrating the link to the accident.
- **Recommend corrective measures:** It is important to issue recommendations or corrective measures (whether temporary or permanent) to ensure that the undesired situation at the time of the accident does not recur. It is also important to identify the person(s) who will be responsible for carrying out the corrective action, and to establish

with them a realistic time frame for correcting the situation. The selection of the person(s) responsible for the corrective action must be approved by the appropriate manager.

## **6. Comments**

We may record any comments deemed relevant to the progress of the investigation. When the situation arises, consider whether disciplinary action or sanctions should be applied if it is concluded that the victim's negligent behavior endangered his/her own safety or that of others, the environment or property. The comments are not recommendations, but commented observations.

## **7. Submission of the survey and analysis report**

It is important, if possible, to submit the report within 72 hours of the event. The completed report should be sent to the Director of Administrative Services for filing in the proper location. The managers responsible for analyzing the reports will be able to make suggestions, comments or corrections before making the final report.

## **8. Apply corrective measures**

The manager must contact the person in charge of corrective measures identified in the investigation and analysis report to explain the corrective measures to be taken and the timetable, once the report has been approved by management. The corrective action officer must be able to take the necessary actions to ensure that the premises, equipment and materials are safe. When the action is completed, he/she notifies the manager.

## **9. Follow-up**

The manager must ensure that the corrective measures are properly implemented. As soon as a corrective measure is implemented, he/she indicates it in the follow-up grid of the investigation and analysis report and ensures follow-up with management.

## Responsibilities

### Direction

- Initiate the investigation and analysis of the accident under the terms of this procedure;
- Ensure, when necessary, that immediate corrective action is taken to secure the event site;
- Inform the CNESST when necessary and welcome the CNESST inspector;
- Assist the appropriate manager during an investigation;
- Review the accident investigation and analysis report completed by a manager, make corrections when necessary and approve it so that corrective measures can be implemented as soon as possible;
- Follow up on corrective actions with the manager;
- Ensures that the timetable for conducting the survey, producing the reports and implementing the measures is respected. If necessary, proposes actions to correct the observed deficiencies;
- Disseminate the procedure and ensure that managers are trained;
- Maintain an up-to-date record of investigations and report annually to the company president;
- Ensure the implementation of the corrective measures selected and integrate the measures for similar situations into its action plan. When relevant, update the prevention program.

### Manager

- Begin the investigation and analysis of an accident on the same day in accordance with the conditions indicated in the procedure or appoint a substitute to do so;
- Go to the scene, when necessary, to observe the facts in order to collect them in completing the report;
- Ensure that the accident site is secured with the cooperation of the responders on site or the appropriate authorities;
- Analyze the accident with the cooperation of competent person(s), if necessary, to determine the causes of the accident and recommend corrective measures, if any;

- Name the person(s) responsible for corrective action;
- Submit the completed report to management by the deadline;
- Contact the Corrective Action Officer named in the report to outline the changes to be made and the timeline to be met;
- Ensure that corrective actions are properly implemented;

**Person involved**

- Collaborate with the manager/management in the accident investigation and analysis process;
- Take the necessary measures to protect their health, safety or integrity and that of others;
- Follow up when necessary.