

HSE

2-24-2 Incident Escalation Process

(A3838999)



Excellence



Honesty



Accountability



Courage

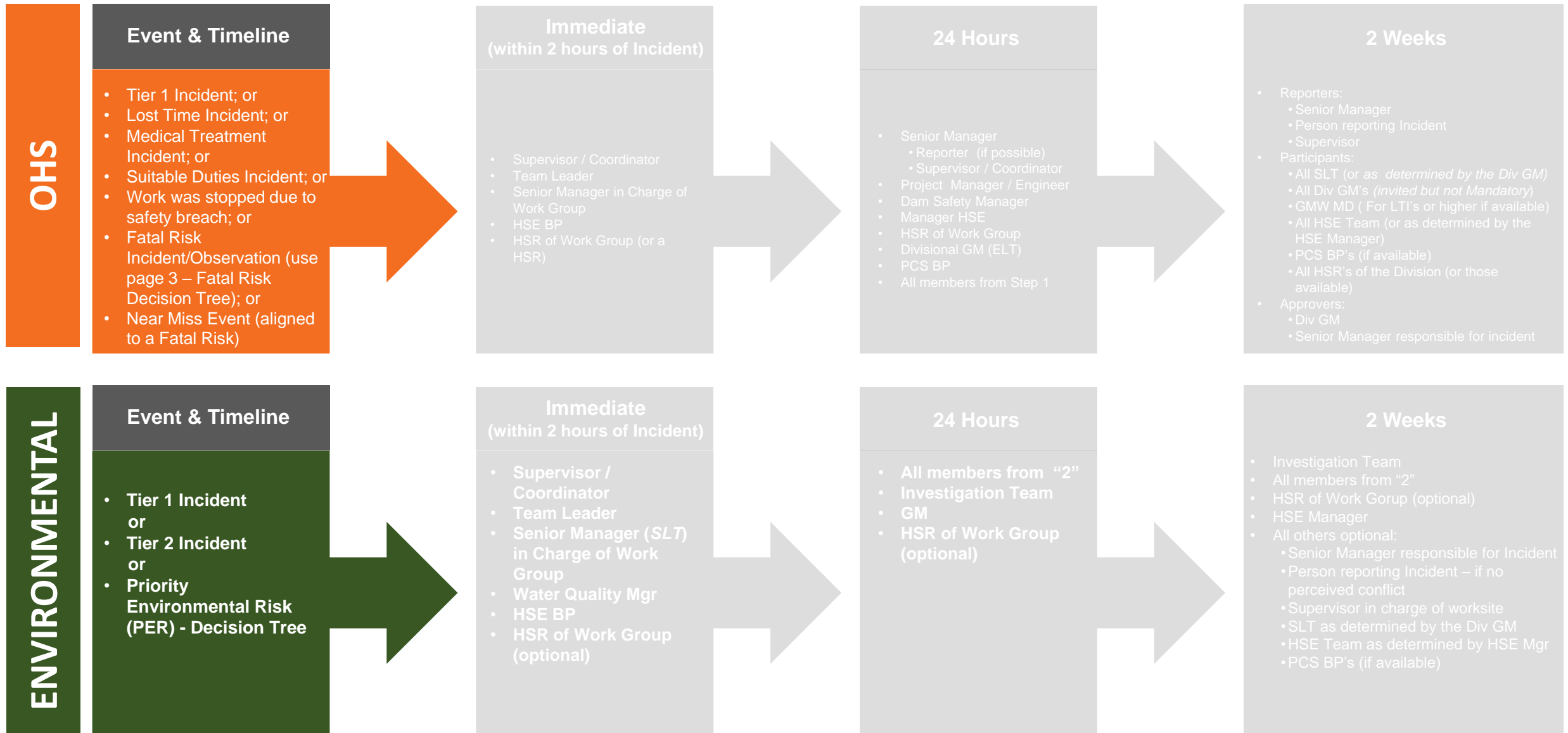


Caring

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Determine the type & severity of incident



Event & Timeline (Determine the severity of incident)

Incident reporter / Team Leader / Supervisor / Coordinator make an initial assessment to classify the incident

As a guide to determining the incident classification the definitions within

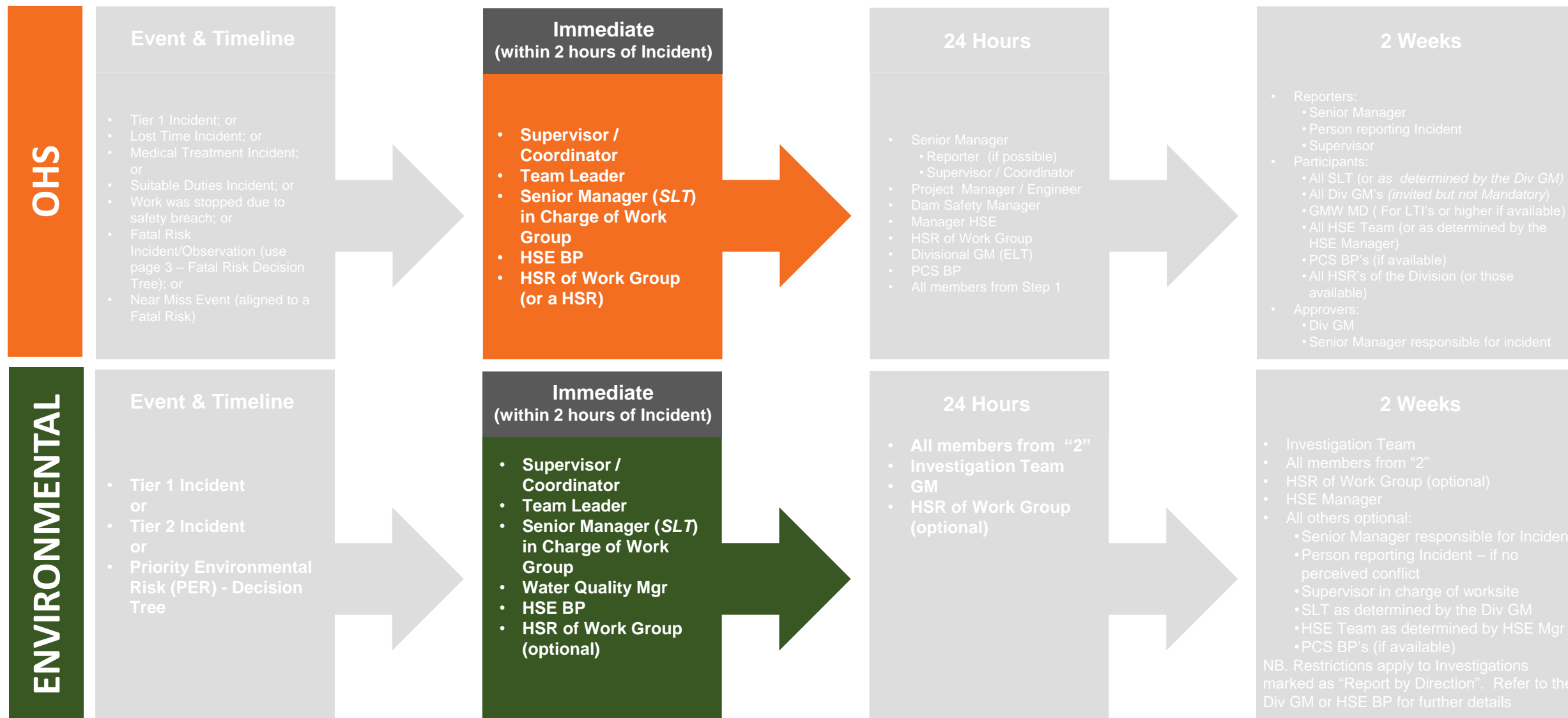
- OHS: Attachment A ([A4700684](#)) and B ([A4700664](#))
- ENV: Attachment A ([A4612500](#)) and B ([A4612512](#))

are to be referred to.

Where the initial incident classification cannot be defined, the 2-24-2 process must be initiated



Step 1 – Notification and containment



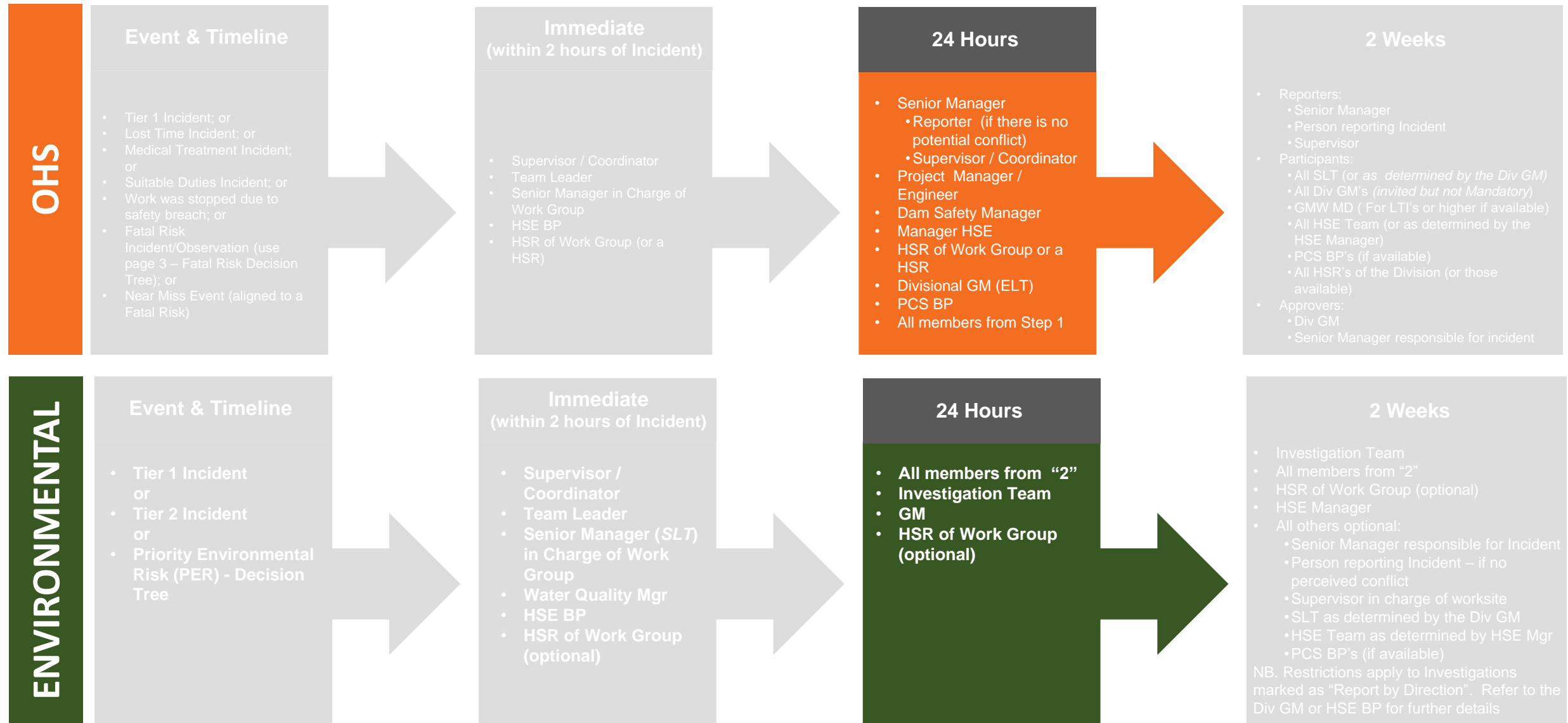
Immediate (within 2 hours of incident – Notification & Containment)

- All events qualifying as either a Tier 1 or 2 shall have individual notification of those listed (above).
- When in doubt, commence notification, and evaluate.
- The decision to **STOP** work occurs here.
- Notification must be via phone call to the reporters immediate Senior Manager and if unable to connect escalate to Alternative Divisional Senior Manager. Once reported, it is the Senior Managers role to ensure all members above are contacted.
- At this point a provisional incident classification will be agreed by the Senior Manager and the Supervisor / Coordinator to determine whether to cease or continue this process (*This process will continue if one of the 3 events (above/ previous slide) have occurred*).

- Supervisor / Senior Manager – Complete IRIS Report and assign Investigation Tier Level and assign tasks (actions) to connect members above to the incident.
- Confirm incident is controlled
 - Ensure workers involved are being cared for
 - OCCCorp notified (if injury or suspected injury is present)
 - Determine if Notifiable – If Notifiable (**Tier 1&2**) this group is to notify the GM within 30 minutes of this meeting who in turn **MUST** notify the MD. If the Incident is determined to be a **Tier 1**, the MD is to notify the Board
 - Determine if Alerts or Toolbox Talks should be created / Sent
 - Who else should we inform
 - Determine type of investigation (refer to investigation matrix)
 - Agree next steps

- Supervisor / Senior Manager – Complete IRIS Report and assign Investigation Tier Level and assign tasks (actions) to connect members above to the incident.
- Confirm incident is controlled
 - Determine if Notifiable – If Notifiable (**Tier 1&2**) this group is to notify GM within 30mins of this meeting who in turn **MUST** notify the MD. HSE BP shall also notify the EPA. If the Incident is determined to be a **Tier 1**, the MD is to notify the Board
 - Determine if Alerts or Toolbox Talks should be created/sent
 - Who else should we inform? Eg. GMW legal team,
 - Determine type of investigation (refer to investigation matrix)
 - Investigate if it is a reoccurring incident at the same location
 - Agree next steps.

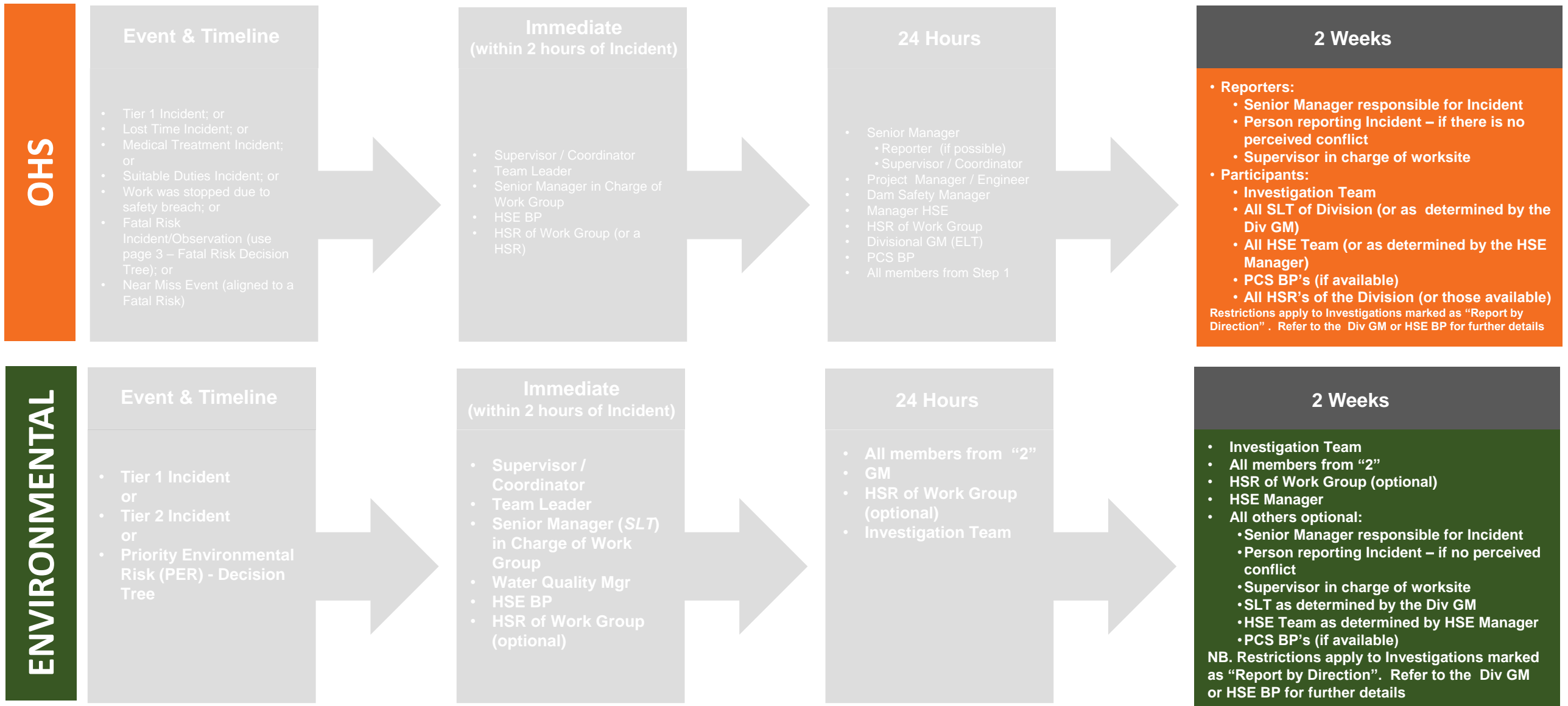
Step 2 – Case management



24 Hours – Case Management

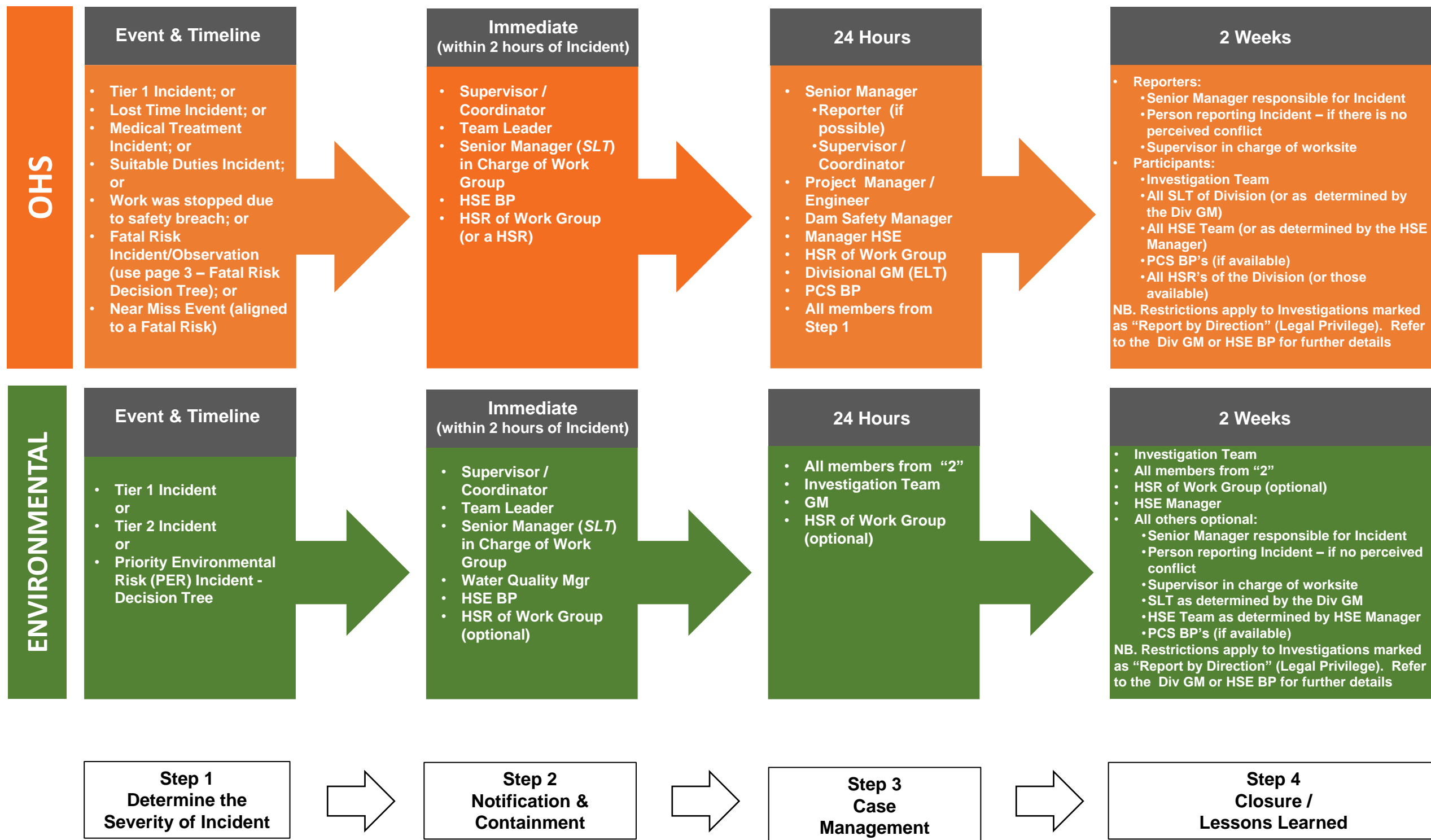
- **The Senior Manager Will ensure a conference call is held within 24hrs of notification.**
- All personnel listed above should be present at the conference call. At a minimum 1 x GM and 1 x HSE BP **MUST** be at this meeting.
- Call focused on reviewing the incident as it has been reported (*at that point*) within IRIS. Confirmation of IRIS classification is made here.
- **The decision to STOP work occurs here.**
- **The welfare of injured or effected parties must be discussed first (OHS)**
- Assignment of Lead Investigator; confirm incident is controlled and discuss immediate actions taken so far, determination whether Alerts or Toolbox talks need to be sent out (*drafted by SLT and passed to HSE BP for checking*).
- Alignments, resources, notifications, materials, etc necessary for incident owner, Senior Leader, Lead Investigator will be authorized during this meeting.
- **Priority of investigation is agreed here by either the Divisional GM / MD / HSE Manager**
- **An update is to be provided to the MD and GM PCS by the Divisional GM at the conclusion of this meeting.**

Step 3 – Event closure / lessons learned



- Meeting to ensure alignment and support the closure action items.
- **The welfare of any injured or effected parties must be discussed first (OHS)**
- Incident Review completed by Senior Manager; Lead Investigator to discuss.
- Case Progress; Root Cause, Contributing Factors, Corrective Actions and Residual Risk Assessment of incident.
- Confirm if Alerts / Toolbox talks need to be distributed
- Div GM, Senior Manager & Incident Owner to review and approve or reject incident review and follow up actions within 1 week of completion of this meeting
- The details of the incident and corrective actions should be presented in Toolbox format to the Incident Owners Division, by the Incident Owner detailing the incident, lessons learnt and any outstanding actions or at the discretion of the GM
- The Div GM & Lead Investigator is to present a summary to the ELT if required
- The 2-24-2 process is not considered complete until IRIS has been updated with all actions as agreed by the GM / Senior Manager

Complete Process





Two tiers most likely to initiate the 2-24-2

OHS

TIER 1

SEVERE Incidents: Fatal or exposure to life changing events

Any work-related injury resulting in a:

- Fatality
- Fatality involving a contractor working for GMW either supervised or not supervised
- A person requiring immediate medical treatment for:
 - Serious laceration or amputation of any body part
 - Head Injury or Loss of Consciousness
 - Eye Injury
 - Separation of skin from underlying tissues such as degloving or scalping
 - Electrical Shock
 - Spinal injury
 - Loss of bodily function
 - Exposure to a substance
- Treatment as an inpatient in a hospital
- Incident causing either permanent or temporary disfigurement
- An implosion, explosion or fire.

TIER 2

MAJOR Incident: Situation is potentially a serious incident if any of the following statements are true

Any work related incident or injury resulting in

- A Fatal Risk Event
Review the *Critical Risk Statement* to determine investigation type for the incident
- Fatal Risk Lost Time Injury
- Serious injury / illness, including:
 - Lacerations requiring stitches
 - Return to Work restrictions treatment
 - Permanent or Long term illness/injury
- Plant Roll Over
- Collapse or failure of a trench or shoring shields protecting a trench
- Collapse or partial collapse of building or structure

OHS

Attachment A:
(see [A4700684](#) for current version)

ENVIRONMENTAL

TIER 1

SEVERE Incident:

Any environmental incident resulting in:

- damage of **national or state significance** causing severe harm to flora/fauna or the environment
- Damage to cultural heritage of national or state significance
- damage that impacts community >10km downstream
- a sewage/effluent spill that affects private residents
- costs > \$50,000 to clean up/restore or in fines
- a public complaint/incident that receives national or state media attention
- a GMW conviction

MD to Notify Board Immediately

TIER 2

MAJOR Incident:

Any environmental incident resulting in:

- damage of **regional significance** causing major harm to flora/fauna or the environment
- damage to cultural heritage of regional or local significance
- external party involvement / investigation (eg EPA, First Nations)
- damage that impacts community 5-10km downstream
- a sewage/effluent spill that affects public land
- a spill into a GMW waterway or sensitive area*
- a spill/emission prescribed in an EPA permission as a Notifiable Incident (pollution)
- a site taking longer than 72 hours to clean up/restore
- costs \$10,000-\$50,000 to clean up or in fines.
- a public complaint/incident receives regional media attention
- a Priority Environmental Risk (PER)

Review the Critical Risk Statement to determine investigation for the incident

* **Sensitive Area:** waterway, surface water, groundwater, national park, state park, state forest, nature conservation reserve, wildlife reserve, Groundwater Quality Restricted Use Zone GQRUZ, declared special water supply catchment area, cultural heritage area, wetlands of international importance; threatened species or communities habitat; or environmentally significant areas and landscapes identified in an environmentally sensitive overlay

GM to notify MD immediately

Environmental Attachment A:
(see [A4612500](#) for current version)

Decision Trees & Critical Risk Statements

OHS

FATAL Risk – Cause of Incident and Injuries

FATAL Risk Decision Tree

FATAL Risk (Exposure) Critical Risk Statement

GMW

OHS Attachment B:
(see [A4700664](#) for current version)

INITIATE 2-24-2

Directly linked to potential FATAL Risk incident due to not working / missing defenses and controls to prevent the incident from arising

Mitigating measures to prevent a re-occurrence must be taken immediately both for this incident and other similar activities being conducted by GMW and its contractors

Apply the GMW Investigation Matrix – A3839001

Yes → Not a 2-24-2

No

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Item	Item Description	Control	Assessment	Verification	Approval	Signature	Date
1	Working alone / remotely	Authorized lone workers, safety monitoring devices	Was the worker authorized to work alone / remotely and did they have lone worker safety monitoring devices operating. Was an alert initiated and responded to on time				
2	Underground / Overhead Services	Never expose plant, equipment or people to risks from unknown or live services	Were services identified and isolated or permits provided by the service asset owner. Were services undamaged or uninterrupted due to operations				
3	Risk of Fall	Always use fall protection when working at height	Was a risk assessment conducted, identifying a risk of falls. Was appropriate fall protection available & used for heights over 2m. Were live edges identified and managed				
4	Mobile Plant & Equipment Interaction	Only operate plant & equipment which has been regularly serviced, has guarding installed and appropriate exclusion zones identified	Was plant / equipment operated by trained / competent persons, is the plant upright or balanced. Was plant / equipment regularly serviced, was their damage >\$2000, were appropriate exclusion zones identified, has guarding being installed on machinery				
5	Energy Isolation - LOTO	Always isolate energy sources and test before touch	Were energy sources identified and controlled. Was LOTO in place. Was there a valid permit in place. Was the asset owner aware an isolation was in place on their asset				
6	Driving	Drive to both our license and road conditions. Only operate the vehicle if safe to do so	Were road rules followed / Was the area clear to operate the vehicle safely. Were members of the public unharmed or sustained no damage. Was the vehicle upright or balanced, was the GMW vehicle damage < \$2000				
7	Working on / In / Near / Over Water	Never expose our workers / contractors to the risk of drowning	Was a risk assessment conducted. Were flotation devices advised and worn, were fall restraint devices worn / used				
8	Confined Space	Only physically capable, trained workers / contractors shall conduct confined space activities supported by appropriate rescue plans	Were all members of the confined space entry team trained in confined space and medically assessed as suitable for High Risk work. Was their a rescue plan identifying a minimum of 3 trained persons per entry				
9	Ground Disturbance	Never allow our workers / contractors to work in unstable excavations and always ensure appropriate controls are in place	Was the risk of subsidence or collapse identified in the risk assessment prior to entering the excavation. Was ground support used. Was a rescue plan in place.				
10	Workplace Violence	Never allow our workers / contractors to be physically assaulted or verbally abused	Was there a risk assessment identifying the potential physical harm / threats of life completed. Was someone physically harmed or had life threatened				

ENVIRONMENTAL

PRIORITY ENVIRONMENTAL RISKS (PER) Cause of Incident and Harm

GMW

PER - Decision Tree

PER (Exposure) Critical Risk Statement (Environment)

Yes (All) → Not a 2-24-2

DEFINITIONS & TYPES OF APPROVALS: A4407120

INITIATE 2-24-2

Directly linked to potential PER due to deficient / flawed / broken / missing defenses and controls to prevent the incident from arising

Mitigating measures to prevent a re-occurrence must be taken immediately both for this incident and other similar activities being conducted by GMW and its contractors

Apply the GMW Investigation Matrix – A3839001

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PER Statement #1

- Was the site assessed for native vegetation, protected flora and/or protected wildlife including habitat prior to works?
- Was the procedure followed?
- Were the works assessed for approvals?
- Was an approval identified for the works?
- Was the approval obtained prior to the works?
- Were all parties aware of the approval and its conditions?
- Was the approval complied with?

PER Statement #2

- Was the oil or fuel spill < 20 litres?
- Was the spill of a hazardous substance < 10 litres?
- Was the procedure followed?
- For discharge of authorised substances:
 - Was the discharge activity assessed for approvals?
 - Was an approval identified for the discharge activity?
 - Was the approval obtained prior to the discharge activity?
 - Were all parties aware of the approval and its conditions?
 - Was the approval complied with?

PER Statement #3

- Was the site assessed as being in a cultural heritage area, prior to the works?
- Was the procedure followed?
- Were the works assessed for approvals?
- Was an approval identified for the works?
- Was the approval obtained prior to the works?
- Were all parties aware of the approval and its conditions?
- Was the approval complied with?

PER Statement #4

- Was the site/activity assessed for sediment control or soil erosion issues prior to the works?
- Was the site known to have invasive species, weeds, seeds or disease?
- Was the procedure followed?
- Were the works assessed for approvals?
- Was an approval identified for the works?
- Was the approval obtained prior to the works?
- Were all parties aware of the approval and its conditions?
- Was the approval complied with?

PER Statement #5

- Was a risk assessment conducted identifying air pollution prior to the works?
- Were sensitive receivers identified?
- Were weather conditions considered?
- Were controls implemented as identified in risk assessment?
- Was the procedure followed?

Environmental Attachment B:
(see [A4612512](#) for current version)

Definitions & Types of Environmental Approvals:
(see [A4407120](#) for current version)

Priority Environmental Risks (PER)

Environmental Commitments & Critical Risk Statements (Environment)

A4407120

Existence Honesty Accountability Coveragearing

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GMW Investigation Matrix (see [A3839001](#) for current version)



Type of Incident				Investigation Team															
Investigation – Tier Level	Injury <i>(Physical & Psychological)</i>	Asset <i>(Plant and Equipment - \$ estimated)</i> <i>As a result of a Safety or environmental incident</i>	Environmental <i>(eg Flora / Fauna / Cultural Heritage / Spills / Biosecurity)</i>	Method Discuss & Agreed at the 2-24-2 Incident debrief	External Investigator	Legal	Executive Leader (Divisional)	Senior Manager (SLT)	Coordinator	Project / Contract Manager / Admin	Supervisor	Team Lead	Health and Safety Representative	Injured/Staff Member	HSE Business Partner (cannot lead / conduct investigation)	Due x Work Days	Investigation Documents	Investigation report submitted to:	
1 Severe	<ul style="list-style-type: none"> Fatality Hospitalization Permanent impairment injury/illness 	<ul style="list-style-type: none"> Critical damage/ failure to plant / equipment Item of plant/equipment is written off >\$50,000 	<ul style="list-style-type: none"> Damage of national or state significance causing severe harm to flora/fauna, biosecurity or the environment Damage to cultural heritage of national or state significance Damage impacts community >10km downstream Sewage/effluent spill affecting private residents Cost > \$50,000 to clean up/restore or in fines Public complaint/incident receives national or state media attention GMW conviction 	As Agreed (Can be lower as advised by MD / Corporate SEC)		*	*										5 (Draft) 10 (Final)	<ul style="list-style-type: none"> Formal Investigation Document Non sensitive data entered into IRIS investigation tool 	<ul style="list-style-type: none"> Board Legal Managing Director Executive Leadership Team HSE Manager
2 Major	<ul style="list-style-type: none"> Lost Time Injury Return to Work restrictions Treatment Permanent or Long term illness/injury Fatal Risk incident (aligned to FR critical risk statement) 	<ul style="list-style-type: none"> Significant damaged plant/ equipment Not available for use for greater than 24 hrs Known impact on business operations >\$10,000 	<ul style="list-style-type: none"> Damage regionally significant causing major harm to flora/fauna, biosecurity or the environment Damage to cultural heritage of regional or local significance External party involvement / investigation (eg EPA, First Nations) Damage impacts community 5-10km downstream Sewage/effluent spill affecting public land Spill into GMW waterway or sensitive area* Spill/emission is prescribed in an EPA permission as a Notifiable Incident (relates to pollution) Site takes longer than 72 hours to clean up/restore Costs \$10,000-\$50,000 to clean up or in fines. Public complaint/incident receives regional media attention PER incident (aligned to Critical Response Statement) 	ICAM Investigation Lead Investigator Appointed by Div GM * Some ICAM's maybe reduced to IRIS investigations as a result of discussions with HSE BP during 2-24-2 Process				*	*						*		5 (Draft) 14 (Final)	<ul style="list-style-type: none"> Formal Investigation Document uploaded into IRIS Details entered into IRIS investigation module 	<ul style="list-style-type: none"> Divisional Executive Leader Senior Leadership Team PCS BP / GM PCS HSE Manager HSE BP Div GM to debrief MD & PCS GM
3 Moderate	<ul style="list-style-type: none"> Medical Treatment Recoverable illness/injuries Incident relating to Life Saving Rule 	<ul style="list-style-type: none"> Damage requires inspection / by authorized personnel and will be unavailable for less than 24 hrs Not likely to cause significant impact to business operational >\$5,000 	<ul style="list-style-type: none"> Damage locally significant causing moderate harm to flora/fauna, biosecurity or the environment GMW self-report to external parties Damage impacts community <5km downstream Site is cleaned up within 72 hours Costs \$1000-\$10,000 to clean up/ restore or in fines Public complaint/incident receives local media attention 	IRIS Investigation				*	*			*	*	*		5 (Final)	<ul style="list-style-type: none"> IRIS Investigation Module 	<ul style="list-style-type: none"> Divisional Executive Leader Senior Leadership Team HSE BP Debrief Div HSR's & Leaders (all levels) 	
4 Minor	<ul style="list-style-type: none"> First aid treatment 	<ul style="list-style-type: none"> Damage allows the plant/ equipment to be used as intended. No impact on business operations >\$0 	<ul style="list-style-type: none"> Minor harm to flora/fauna, biosecurity or the environment Contained within the immediate area of the source of impact (could not migrate offsite to land, surface water or stormwater drains) Costs <\$1000 to clean up/ restore or in fines Complaint received 	IRIS Investigation			*				*	*	*	*		5 (Final)	<ul style="list-style-type: none"> IRIS Investigation Module 	<ul style="list-style-type: none"> Senior Leadership Team HSE BP Debrief Div HSR's 	
5 Near Miss (HPI)	<ul style="list-style-type: none"> Fatal Risk incident (other than critical risk statement) Near Miss Medium Risk Score as per Risk Matrix 	<ul style="list-style-type: none"> High Potential Incident (Aligned to Fatal Risk) Risk Score of High as per the Risk Matrix 	<ul style="list-style-type: none"> High Potential Incident (Severe/Major) as per above 	IRIS Investigation			*				*	*	*			5 (Final)	<ul style="list-style-type: none"> Details entered into IRIS investigation Module Toolbox Talk to Division by SLT 	<ul style="list-style-type: none"> Senior Leadership Team HSE BP Debrief Div HSR's 	
6 Near Miss	<ul style="list-style-type: none"> No Injury No Damage 	<ul style="list-style-type: none"> Low / Medium incidents based on residual risk Matrix 	<ul style="list-style-type: none"> No environmental harm 	IRIS Report			*				*	*	*			5 (Draft)	<ul style="list-style-type: none"> Enter into IRIS Tool Box Talk (as agreed with SLT) 	<ul style="list-style-type: none"> Division incident occurred Dissemination as agreed 	