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1. STATEMENT OF POLICY

Westminster College (College) is committed to providing a safe and healthy campus for students, faculty, staff, and guests, and as such recognizes the value of encouraging the reporting of environmental, health, and safety incidents. The College will investigate these reports to the extent warranted by their severity, and corrective actions shall be made as needed to prevent similar incidents from occurring in the future.

To ensure a timely incident response and investigation, the College requires its employees (faculty, staff, and student employees) to report work-related incidents as soon as possible, but no later than 24 hours after the incident occurred. If a College employee is made aware of a student, visitor, guest, or contractor injury, this must also be reported as soon as possible, but no later than 24 hours after having been made aware of the injury.

2. PURPOSE

The purpose of this document is to establish the procedures for reporting environmental, health, and safety (EHS) incidents at the College and to describe the process of incident investigation to identify the causes of these incidents in order to develop corrective and preventive actions. For instructions on how to respond to emergency situations, refer to 502 Emergency Management Plan.

The College will not discriminate or take disciplinary action against its employees for reporting work-related fatalities, injuries, illnesses, or otherwise exercising their rights under the Occupational Safety and Health Act (OSHA).

3. SCOPE

The scope of this procedure covers environmental, health, and safety incidents and near misses that occur at the College and its properties; and incidents involving faculty, staff, and/or students engaged in College activities and/or business while off-campus.

Criminal acts are outside the scope of this procedure. This is not a criminal investigation procedure and is not intended for use in investigating crimes committed on campus or crimes committed by or against College personnel off-campus.

4. DEFINITIONS

The primary terms used in this procedure include the types of events or circumstances that should be reported as EHS incidents.

**Compliance Issue**: An existing or potential condition that is not in compliance with College safety policies or procedures, or with applicable EHS regulations.
Incident: Any unplanned/unintentional event in which a fatality, injury, illness, or property damage has occurred or could have occurred. Types of incidents that should be reported include:

- Injury
- Needle stick injuries or cuts from sharp objects that may be contaminated with human blood or bodily fluids
- Fire / Explosion
- Hazardous Material Spill
- Property Damage
- Alarm Activation (fire alarm, emergency exit door alarm or security alarm)

Injury: An abnormal condition or disorder of the body which occurred on the College campus and/or in the course of College activities. Injuries include, but are not limited to: cuts, fractures, sprains or strains, amputations, and occupational and/or activity-related illnesses such as illness resulting from exposure to a chemical or physical agent, ergonomic disorders, skin disease, respiratory disorders, or poisoning.

Near Miss: Any unplanned/unintentional event that had the potential to result in an injury, or property damage, but did not. Other common terms for this kind of event include “close call,” “near collision,” “near hit” or “narrow escape.”

Unsafe Condition: An existing or potential condition that by itself or considered with other factors has the potential to cause harm.

5. ROLES AND RESPONSIBILITIES

College Leadership

The President of the College is responsible for enacting the College’s commitment to provide a safe and healthy campus for faculty, staff, and students, as well as endorsing the content of this EHS Incident Reporting and Investigation Procedure, and allocating the necessary resources to comply with its requirements.

Director of Campus Safety

The Director of Campus Safety is responsible for the maintenance of this procedure, for developing and conducting training for other College personnel in incident reporting and investigation, for leading or participating in incident investigations when appropriate, for maintaining final incident reports, for maintaining the OSHA 300 Log for recordable injuries in accordance with OSHA recordkeeping requirements, and for arranging for the proper communication regarding incidents to College personnel or departments depending on the nature of the incident.
Director of Campus Security

The Director of Campus Security is responsible for ensuring that EHS incidents within the scope of this document that are reported and/or handled by Campus Patrol are communicated to the Director of Campus Safety.

Human Resources

The Executive Director of Human Resources is responsible for filing workers’ compensation claims when necessary, and for working with injured College personnel on accommodating work restrictions or time away from work based on physician recommendations.

College Employees

All employees of the College, whether faculty, staff, or student employees, are responsible for reporting all work-related fatalities, injuries to their supervisor or the Director of Campus Safety as soon as possible, but no later than 24 hours after the injury occurred. College employees may be asked to participate in incident investigations and complete tasks as part of the corrective action plan developed by the investigation team.

Supervisors

Any College employee acting in a supervisory capacity to another College employee or contract employee must ensure that any work-related fatalities, injuries reported to them by their employee(s) and/or contractor(s) are communicated to the Director of Campus Safety as soon as possible. Supervisors may be asked to participate in incident investigations and complete tasks as part of the corrective action plan developed by the investigation team.

Eccles Health, Wellness and Athletics Center (HWAC) Reception Desk Staff

HWAC reception desk staff involved in providing College identification cards to new faculty, adjunct faculty, or staff members are responsible for providing a copy of 504D EHS Incident Reporting Procedure Information Sheet to the new College employee at the time the identification card is issued.

Conference and Event Services

The Director of Conference and Event Services is responsible for notifying the Director of Campus Safety when a fatality, injury, or incident resulting in property damage occurs during an on-campus conference or event.
Student Services

The Dean of Students is responsible for notifying the Director of Campus Safety of student fatalities, injuries, or incidents resulting in property damage, and managing such incidents according to internal procedures.

6. INCIDENT REPORTING PROCEDURE

When an incident or near miss (as defined in this procedure) occurs, it must be reported, either by the individual involved, witness(es) to the event, or the individual’s supervisor. This can be accomplished by completing the 504A EHS Incident Report Form available on the College website, which can be found at the following location:

https://www.westminstercollege.edu/internal-content/resources-and-services/risk-management/ehs-incident-report

In order for the investigation team to respond to incidents in a timely manner, incidents should generally be reported no more than 24 hours after they occurred. Incidents involving fatalities, life-threatening injuries, or hospitalizations must be reported immediately by calling the Director of Campus Safety (801-832-2529).

Crime, traffic, and parking incidents should be reported directly to Campus Patrol by calling 801-832-2525. A Campus Patrol officer will respond quickly to the call and make a report of the incident according to internal department procedures. The Director of Campus Safety will be notified of incidents that may also fall within the scope of this procedure.

A. Incident Reporting

The first action in the event of an incident is to determine whether anyone has been injured and the extent of those injuries. Preserving life and preventing medical emergencies from worsening is the first priority.

1. If the injury is potentially life-threatening, call 911 immediately to ensure the injured person(s) receives medical attention.
   - After ensuring that emergency medical responders are on the way, contact the Director of Campus Safety or Campus Patrol as soon as possible to notify them of the incident.
   - Preserve the scene. Prevent others from entering the area where the injury occurred until the Director of Campus Safety or Campus Patrol can respond to take control of the situation.
2. If the injury is not life-threatening but requires medical attention, arrange for the injured person(s) to be transported to the nearest urgent care clinic or emergency room.

Preferred urgent care clinic:

**FIRSTMED Clinic**
Mon – Fri, 7:00 AM to 7:00 PM
441 S. Redwood Road
Salt Lake City, UT 84104
Phone: 801-973-2588
www.firstmedclinic.com

If the injury occurs outside the hours listed above or during a holiday for which the preferred clinic is closed, the injured person(s) should go to the nearest emergency room.

3. If the injury can be adequately treated with first aid procedures, administer first aid if trained to do so. If not trained in first aid, assist the injured person in obtaining or self-administering first aid.

4. Complete an [EHS Incident Report Form](#), making sure to enter the appropriate information in all the required fields. Include as much information as possible about the event, including:
   - Date / time of the incident
   - Type of incident
   - Location of the incident
   - Injury/Injuries – Who was hurt? How were they hurt? What kind of treatment have they received?
   - Sequence of events
   - Witnesses

**B. Near Miss Reporting**

As defined in Section 3 of this procedure, a Near Miss is an unwanted / unexpected event in which no injury or property damage has occurred, but likely could have occurred with a slight change in circumstances.

1. Verify that no one was injured as a result of the event.

2. Take action to ensure that the scene of the event is safe – turn off equipment, correct hazards, etc.
3. Complete an [EHS Incident Report Form](#) and make sure to select “Near Miss” in the appropriate section. Include as much information as possible about the event, including:
   - Date / time of the event
   - Location of the event
   - Sequence of events
   - Potential consequence – If the event had unfolded slightly differently, what could have happened?
   - Witnesses

C. Unsafe Condition / Compliance Issue Reporting

Unsafe conditions or compliance issues should also be reported. This is an important part of preventing incidents before they occur, and identifying areas which may represent recurring issues so that the College can direct its resources more efficiently.

1. Document the condition and/or compliance issue.

2. Complete an [EHS Incident Report Form](#) and make sure to select “Unsafe Condition / Compliance Issue” in the appropriate section. Include as much information as possible about the condition, including:
   - Date / time of the observation
   - Location of the condition / compliance issue
   - The nature of the condition or compliance issue – How could this cause an incident? How is the issue out of compliance with College policies or applicable EHS regulations?

D. Off-Campus Incidents

If an incident involving a College employee or student engaged in College activities or business occurs in the course of that activity or business, it must be reported.

**United States Domestic Locations**

If the incident has resulted in an injury or injuries, as with on-campus incidents, the first actions taken must be to preserve life and prevent medical emergencies from worsening.

1. If the injury is potentially life-threatening, call 911 immediately to ensure the injured person(s) receives medical attention.
   - After ensuring that medical responders are on the way, contact the Director of Campus Safety immediately to notify them of the incident.
• Document the scene. Because the incident has occurred off-campus, it may not be possible to preserve the scene or feasible for the incident investigation team to review it. Take photos and/or video, take notes to preserve memory of the sequence of events, and collect statements and/or contact information from witnesses not affiliated with the College.

2. If the injury is not life-threatening but requires medical attention, arrange for the injured person(s) to be transported to the nearest urgent care clinic or emergency room.

3. If the injury can be adequately treated with first aid procedures, administer first aid if trained to do so. If not trained in first aid, assist the injured person in obtaining or self-administering first aid.

4. Complete an EHS Incident Report Form, making sure to enter the appropriate information in all the required fields. Include as much information as possible about the event, including:

   • Date / time of the incident
   • Location of the incident – be specific, and include an address
   • Injury / injuries – Who was hurt? How were they hurt? What kind of medical treatment have they received?
   • Sequence of events
   • Witnesses – statements, contact information, etc.

**International Locations**

If an incident as described above occurs in an off-campus location outside the United States, follow the same procedure for off-campus incidents and also determine whether or not the nearest U.S. Embassy or Consulate must be contacted. It is important to know the contact information for both local emergency services and the nearest U.S. Embassy or Consulate when conducting College activities or business abroad.

Contact the U.S. Embassy or Consulate if the incident resulted in or from any of the following circumstances:

• The arrest or detention of any College-affiliated U.S. citizen
• The death of any College-affiliated U.S. citizen
• Medical emergencies involving College-affiliated U.S. citizens
• Missing or abducted College-affiliated U.S. citizens
• A natural disaster (earthquake, severe storm, etc.)
• Crisis (international unrest, military conflict, terrorist attack, etc.)
If College-affiliated employees or students involved with international activities or business are citizens of countries other than the United States, the appropriate consulate notification procedures should be followed.

7. INCIDENT INVESTIGATION PROCEDURE

Investigation of EHS Incidents and Near Misses shall be conducted by an incident investigation team. The team will be made up of College personnel with relevant knowledge, experience, and expertise related to the circumstances of the event. Any College employee may be asked to participate in an incident investigation if their contributions and input are deemed valuable by the investigation team leader.

In general, the Directory of Campus Safety will lead incident investigations, but incident investigations may be led by other designated College personnel with the relevant training and experience.

Incident investigations shall consist of three main phases:

- Information collection
- Root cause analysis
- Corrective / preventive action plan

The purpose of an EHS incident investigation is not to determine fault or assign blame, but to understand the underlying contributing factors to the event and develop corrective and/or preventive actions to reduce the likelihood of the same or similar event occurring in the future.

A. Information Collection

This phase of the incident investigation is focused on gathering information related to the Incident or Near Miss, starting with the completed EHS Incident Report. Critical information necessary for a thorough incident investigation include:

1. Documentation of the Scene

   This documentation can include photos or videos of the location of the event, and sketches or floorplans of the location and the essential elements of the incident.
2. Review of Related Documents

As part of collecting information, a review of the relevant documents should be part of the investigation. These can include, but are not limited to, the following:

- College policies and procedures
- Equipment manuals
- Training materials and records
- Maintenance schedules and/or logs
- Inspection reports
- Previous incident history
- Industry guidance and standards

3. Interviews

Interviewing the person(s) involved in the incident (injured person or persons, witnesses, supervisors, etc.) is a valuable process of understanding how the event occurred and what could be done differently to prevent future incidents.

B. Root Cause Analysis

Addressing the root cause(s) of an incident is a means of preventing a recurrence of the incident; and in order to fully address root causes, the root cause must be properly identified.

There are a variety of approaches to root cause analysis, but the primary method to be followed and documented in the incident investigation is the “5 Whys” method. This method is interrogative in nature, and begins with a statement of the problem. The question “Why?” is asked until a root or systemic cause is identified. There can be more than one answer to each “Why?” resulting in multiple interrogation chains and root causes. The name of this method refers to the average number of times “Why?” must be asked in order to arrive at a root cause.

C. Corrective / Preventive Action Plan

For each root cause that is identified during the root cause analysis stage of the investigation, a corrective action must be developed. The corrective action must adequately address the nature of the root cause, and must include the following information:

- Action priority (immediate, moderate, low)
- Detailed description of the action to be taken
- Person responsible for completing the action
- A date by which the action must be completed
- Date(s) of action completion and verification
Corrective action due dates must be agreed to by the person responsible for completing the action, and must be appropriate to the scope of the action and the priority assigned to the action. If the responsible person needs support, assistance, or an extension of the due date, they should contact the Director of Campus Safety.

Incident reports will not be considered to be fully closed until all assigned actions are completed.

Preventive actions may be assigned to correct reported unsafe conditions or compliance issues after the report is reviewed and information collected to fully understand the nature of the condition.

8. RECORDKEEPING

All EHS Incident Reports and associated investigations will be maintained in the files of the Director of Campus Safety. Each report will be assigned an identification number for ease of traceability.

The Director of Campus Safety will add incidents that are determined to be OSHA recordable to the OSHA 300 Log of the current year. This will include work-related fatalities, work-related injury that results in lost time or restricted work, work-related injury that requires medical treatment beyond first aid, work-related cases of hearing loss, work-related needle stick/sharps injuries, and cases requiring medical removal.

College employees may request access to OSHA injury and illness records maintained by the College. Upon receipt of a written request from a College employee or an authorized representative of the employee, the Director of Campus Safety will provide them with a copy of the requested records by the end of the next business day.

The Director of Campus Safety will also provide OSHA injury and illness records to authorized government representatives upon request.

The Human Resources department will maintain information related to workers’ compensation claims.

9. TRAINING

All College employees, including student employees, must be informed of the method for reporting work-related EHS incidents.
New faculty, adjunct faculty, and staff members will be issued a copy of 504D EHS Incident Reporting Procedure Information Sheet at the HWAC reception desk at the time they are issued their College identification card.

Student employees will be informed of the reporting procedure each semester as they complete the required online safety training module.

For College employees participating in an incident investigation, training in the investigation procedure and interview techniques will be provided to those who have not already had the experience of participating in an incident investigation. In general, the Director of Campus Safety will conduct this training, but other designated College personnel with the relevant training and experience may also conduct training.

10. RESPONSIBLE ADMINISTRATOR

The Director of Campus Safety is responsible for administering this procedure and for ensuring that reported incidents are investigated accordingly.

11. RELATED DOCUMENTS

Documents related to this procedure are as follows:

502 Emergency Management Plan

504A EHS Incident Report Form

504B Incident Investigation Form

504C Incident Communication Flowcharts

504D EHS Incident Reporting Procedure Information Sheet

12. HISTORY

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<td>September 26, 2017</td>
<td>EHS Incident Reporting and Investigation Policy and Procedure ADOPTED</td>
<td>Policy Governance Committee</td>
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<tr>
<td>July 19, 2017</td>
<td>Interim EHS Incident Reporting and Investigation Policy and Procedure APPROVED</td>
<td>Policy Governance Committee</td>
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</table>
13. SIGNATURE, TITLE, AND DATE OF APPROVAL

Approved: /s/ ____________________________________________

Stephen R. Morgan, President