**PDO HSE Incident Investigation Process Guideline - 2020**

The HSE incident investigation process for lost time (LTI), high potential (HiPo), non accidental death (NAD) and AIPS Tier-1 incidents assures investigation efficiency, quality, depth and reduces management time. This is a guide of how it should be done.

1. **Notification** **– day 0**

MSE3 team in liaison with Directorate HSE Team Leader (TL) creates the official notification and first alert for the director/MD to issue out to the business after receiving official PDO medical report and confirming it is work related.

\*IMPORTANT NOTE 1.: If the incident is not reported to the PDO medical team within 24hrs of the incident occurring, then “Day 0” for the investigation is classified as the date of the incident, not the date of notification from the medical team to the MSE3 team.

\*IMPORTANT NOTE 2.: All incident are work related until an investigation proves otherwise

1. **Kick Off Meeting – day 0-1**
	* + HSE TL to confirm Incident owner and Investigation Leader (below guidance points)

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| --- | --- | --- | --- |
| **Resource (actual/potential)** | **1,2 / Low**  | **3 / Medium** | **4,5 / High / High value learning AI-PS** |
| An appropriate Investigation Team Leader with sufficient authority, time and focus to lead the team. | X | X | X |
| Sufficient directorate investigation team members locally to the incident. | X | X | X |
| Sufficient directorate investigation team members based at the coast. |  | X | X |
| Specialist support from other directorates. |  | X | X |
| The Directorate HSE Team-leader |  | X | X |
| Corporate incident investigator  |  |  | X |

* + - Incident Owner in conjunction with HSE TL arranges “Kick Off” meeting” with MSE3 representative (rep), HSE TL, Investigation Leader (PDO/Contractor), Contractor HSE Manager, competent investigator in Incident Causal Analysis Methodology (ICAM).
		- Incident owner/HSE TL calls for specialist support / subject matter expert (SME) as required.
		- MSE3 rep acts as a consultant for the investigation team providing guidance and support from the initial stage of the kick off meeting to the end.

**The Kick off meeting produces:**

* Investigation Terms of reference (ToR).
* Incident description to support the incident classification.
* The team composition, ensuring the appropriate investigation leader and competent incident investigator.
* 
* The up to date investigation template.
* Agreement on the incident critical factors and investigation scope.
* Timeline for the 1st (10 days)& 2nd draft reports, MSE- Incident Review Committee (IRC)(23 days), directorate IRC/MD-IRC (30 / 42 days)
* All Fatal and Tier 1 events will be required to be seen at MDIRC (high level initial findings) within 10 days to be advised during the Kick off meeting and scheduled by MSE3 team
* Clear understanding of consequence management for non compliance.
* The meeting shall be no more than 60 minutes.
* The investigation team leader distributes the ToR within 2days of the meeting.

**The ToR defines the following;**

* Investigation protocol and references
* Critical factors and the scope of the investigation
* Incident owner, investigation team leader and support / SME as required.
* Investigation time line
* Incident PIM ID and Previous incident where applicable.
1. **Investigation deadlines**

|  |  |  |  |
| --- | --- | --- | --- |
| **Rolling Days** | **Action / Task** | **Responsible Party** | **Remarks** |
| Day 0 | Notification received from MCOH | MCOH |  |
| 0 | Initial Notification, and first Alert | MSE 3 team |  |
| 1 | Kickoff meeting | Directorate operations Incident Owner/ HSE team | MSE 3 team to be invited |
| \*10 | 1st Draft of report to MSE 3 Team | Investigation Leader | Critical point HSE TL to review and send comments to MSE3Selected (Fatal, Tier1 , Director or MSEM requests, significant HiPo’s ) incidents draft pack to be submitted for MDIRC |
|  | Review 1st draft return consolidated feedback | MSE 3 team  | Returns to Investigation leader |
|  | 2nd Draft of report to MSE 3 representative | Investigation Leader | Any further comments from HSE TL share with MSE3 team |
|  | Review of 2nd draft return consolidated feedback | MSE 3 team | Returns to Investigation leader |
| 21 | Final revision for MSE IRC | Investigation Leader | HSE TL to support on review Pre read to be sent for IRC |
| \*23 | MSE IRC | MSE 3 team to facilitate | Critical point |
|  | Final report  | Investigation leader | To Director for IRC InviteHSE TL to support |
|  | QA / QC letter | MSE 3 team |  |
| \*30 | Director IRC | Directorate HSE TL | Director comments only if going to MDIRC Critical point  |
| 42 | MDIRC | MSE 3 team |  |

\*Critical points (Rolling Days) - Escalation for failure to meet deadlines:

* +3 days overdue MSE 3 team will send a reminder -1 to Incident Owner, Directorate HSE TL and MSE 3.
* +5 days overdue MSE 3 team will send reminder -2 to Incident Owner, HSE TL, MSE 3, MSEM and copy Director.
* Note for 1st time investigations from contractor escalation may be delayed for up to 5 days.
1. **Incident investigation by the investigation team**
	* + - The investigation team as agreed in the kickoff meeting joins the local management to help collect evidence, interviews, scene info and to establish incident factors. If at the weekend this visit should not wait for the kick off meeting to take place.
			- An MSE3 representative will join the site visit for any fatal work related incident.
			- The team focus on the ToR & investigation scope referring to critical factors causational factors and determining underlying causes & latent management system failures.
			- The team shall refer to GU-612 for guidance and supportive tools and contact MSE3 team for support and advice.
2. **MSE3 pre IRC quality assurance**
	* The Investigation Leader, in conjunction with HSE TL organizes the 1st and 2nd draft investigation report review and feedback sessions with the MSE3 representative.
	* The HSE TL arranges a directorate HSE team quality check of the report for basic layout, relevant version and basic quality of the ICAM and content before it’s issued for MSE3 team review.
	* The Investigation Leader, in conjunction with HSE TL ensures the investigation report evolves as a result of the meetings with the corrections and amendments’ being made until the final version is ready.
	* The Investigation Leader emails the final version to the MSE3 representative to organize the MSE3-IRC.
	* The MSE3 team reviews the report; collate all inputs into one common agreed feedback for the MSE3-IRC.
3. **Evidence repository**
* The Investigation Leader, in conjunction with the contractor HSE will ensure all evidences are stored in a folder and a copy provided to the Investigation Team Leader and the MSE3 team on a data stick to ensure PDO has copies of all investigation evidences, or shared electronically along with submission of 1st draft of the report.
* The folder must have two sub folders
	+ Investigation evidences
	+ Action close out evidences
* Any updated evidence in addition to the folders filled with all the necessary evidences must be provided no later than the MSE3-IRC to ensure any enquiries around evidences can be answered.
1. **MSE3-IRC**
	* The MSE3 team organizes and chairs the MSE3-IRC inviting relevant key investigation personnel.
	* Outlook invitations with pre-read material are issued 2 working days beforehand.
	* No attendees are allowed to attend unless they have read the report.
	* The investigation team will receive the final MSE3 team collated feedback in one report handed over to the team leader after the MSE-IRC.
	* After making the final edits the Investigation leader emails the final version to the MSE3 rep for final QA/QC endorsement.
	* MSE3 team issues the director, HSE TL, Incident Owner and Investigation Leader a QA/QC declaration advising if acceptable or not. If agreement cannot be reached then the QA/QC declaration will advise why but not limited to e.g. there is a dispute on the findings, content or evidences
	* The HSE TL obtains the directors decision whether to proceed to his IRC or apply consequence management.
	* Where a safety default action is implemented it incurs a 500 RO fine/day for each day after the deadline until the IRC is complete and to insist on mandatory attendance/re-attendance the PDO HSE investigation course of their investigator, supported by an action in PIM on the Contract Holder.
	* After the MSE3 IRC a recommendation may be given by MSE3 and the HSE TL to the MD or director that this is not to be put forward for IRC due to the lack of learning’s for discussion from the investigation.
2. **Directorate IRC and MD-IRC**
* Directorate IRC will follow the MSE3-IRC for the medium potential classified LTIs only. For HiPos, NADs and Tier-1s incidents they are escalated directly to the MDIRC after the QA/QC sign off.
* The director can call for a pre-brief of the investigation prior to the MDIRC with limited key investigation personal (i.e. incident owner, investigation team leader and HSE TL). Any additional comments from the director pre-brief session is embedded into the report for the next level MDIRC .
* The directorate HSE TL organises the directorate IRC.
* MSE3 team updates the MDIRC dashboard and monitors time line compliance.
* Incident owner is accountable to ensure all actions are logged in PIM, the Investigation leader is responsible and HSE TL verifies ensure all actions are correctly logged. The MSE3 team monitor progress and report on compliance/close out.
1. **MD-IRC**
	* MSE3 team organises MD-IRC following the MSE-IRC and incident owner agreement.

MDIRC process guideline;

* + - Incident owner assigns a minute taker prior to the meeting and advises this in the meeting.
		- At the end of the meeting the MDIRC agrees and endorses;
			* Actions from the final report presented in the MDIRC.
			* Additional actions from the MDIRC discussion.
			* Assigning of action party and target dates.
			* Minute taker provides MSE3 team with minutes within 1 day of the MDIRC to check and confirm the minutes ready for distribution.
			* MSE3 team issues out draft minutes immediately to all action parties with a 2 days deadline for feedback.
			* After 2 days the draft minutes are issued to MD/TD and any other attendees of the MDIRC.
		- After the MD/TD confirmation of the draft minutes the final version is issued. Thereafter any request for amendments will require MD approval.
		- All action parties must confirm by email acceptance of their actions whereby MSE3 team will upload the MDIRC minutes actions into PIM with either MSE3 or MSE8 as post action verifier, t within 5 days of the MDIRC endorsement of the actions and final MDIRC minutes of meeting.
		- The HSE-TL supports and ensures that the actions from the investigation pack are uploaded into PIM.
			1. MSE3 team is responsible for the QA/QC of the PIM process, confirms actions are appropriately addressed as agreed in the MDIRC and issues monthly MDIRC actions close status report to the directors and quarterly to the MD
			2. The MD requests the MSE3 team to deliver thematic MDIRCs on incident trends/over-dues and action over-dues.

**END OF GUIDANCE**