Near Miss Reporting and Follow Up Policy

1.0 Policy Purpose & Scope

The purpose of this Near Miss Reporting and Follow Up Policy is to establish a systematic process for the identification, reporting, investigation, and corrective action of near miss incidents. A near miss is an unplanned event that did not result in injury, illness, or damage, but had the potential to do so. The core objective is to proactively identify and mitigate hazards before they cause harm, thereby reducing the risk of future incidents and fostering a culture of safety. This policy applies to all employees, contractors, subcontractors, visitors, and any other personnel working at or on behalf of [Company Name] at all company-owned, leased, or project sites. It covers all near miss events, regardless of the perceived severity or potential consequence.

2.0 Regulatory Context & Compliance

This policy is driven by the following legislative and regulatory requirements:

- Workers Compensation Act (WCA), Part 3, Division 3: General Duties of Employers, Workers, and Others, which requires employers to provide a safe workplace and workers to report hazards.

- WorkSafeBC Occupational Health and Safety Regulation (OHSR), Section 3.10: Incident Investigation, which mandates that employers investigate all incidents, including near misses, to determine root causes and implement corrective actions.

- WorkSafeBC OHSR, Section 3.11: Reporting of Incidents, requiring immediate reporting of certain incidents, but also establishing a duty to report all hazardous conditions.

- WorkSafeBC OHSR, Section 4.20: Hazard Identification and Risk Assessment, which requires ongoing identification of hazards.

- Canadian Criminal Code (Bill C-45): Legal duty of organizations and their representatives to take reasonable steps to prevent bodily harm, which is reinforced by a robust near miss program.

- Applicable industry-specific standards (e.g., CSA Z1000-14 Occupational Health and Safety Management, CSA Z1002-12 Occupational Health and Safety – Hazard Identification and Elimination and Risk Assessment and Control).

3.0 Roles & Responsibilities

Employer/Management:

- Provide the resources, training, and systems necessary for effective near miss reporting and follow up.

- Ensure that no worker faces reprisal or discipline for reporting a near miss in good faith.

- Review near miss data quarterly to identify systemic trends and allocate resources for corrective actions.

- Ensure that corrective actions from near miss investigations are implemented and tracked to completion.

Supervisors: - Actively encourage and facilitate the reporting of near misses by their team members.

- Conduct or oversee the initial investigation of reported near misses within 24 hours.

- Ensure that immediate corrective actions are taken to prevent recurrence.

- Document all near miss reports and investigations in the company's safety management system.

- Communicate lessons learned from near misses to their team during safety meetings.

Workers: - Report all observed near misses immediately to their supervisor, using the designated reporting form or digital tool.

- Participate in the investigation process as required, providing accurate and honest information.

- Follow all corrective actions and safe work procedures resulting from near miss investigations.

- Do not attempt to conceal or downplay a near miss.

4.0 Program Execution & Procedures

The Near Miss Reporting and Follow Up program shall be executed through the following administrative steps:

1. Identification & Immediate

Action: Any worker who observes a near miss must immediately secure the area to prevent further risk, if safe to do so, and report the event to their supervisor within the same shift.

2.

Reporting: The worker or supervisor must complete the Near Miss Report Form (available on SafeDesk and in paper format at all site offices) within 24 hours.

The form captures: date, time, location, description of the event, potential consequences, contributing factors, and any immediate corrective actions taken.

3.

Investigation: The supervisor, in consultation with the Joint Health and Safety Committee (JHSC) or safety representative, shall conduct a root cause analysis (using techniques such as 5 Whys or Fishbone Diagram) within 48 hours. The investigation must identify direct, contributing, and root causes.

4.

Corrective Action Plan: Based on the investigation, a corrective action plan is developed, specifying actions, responsible persons, and target completion dates. Actions may include engineering controls, administrative changes, training, or personal protective equipment upgrades.

5. Implementation & Tracking: The supervisor is responsible for implementing corrective actions. The safety department tracks all actions in a master log, with monthly status updates provided to the JHSC.

6.

Communication: Lessons learned from significant near misses are communicated company-wide via safety bulletins, toolbox talks, or the company intranet within one week of investigation completion.

7.

Trend Analysis: The safety department conducts a quarterly analysis of all near miss reports to identify recurring hazards, high-risk activities, and systemic weaknesses. Results are presented to management and the JHSC.

5.0 Review & Recordkeeping

All near miss reports, investigation documents, and corrective action records shall be retained for a minimum of three

(3) years from the date of the event, or longer if required by regulatory or legal proceedings. Records are maintained by the Safety Department in a secure, centralized database (SafeDesk) and are accessible to the JHSC, supervisors, and management. The policy itself shall be reviewed annually by the Joint Health and Safety Committee and the Safety Director to ensure effectiveness and alignment with current regulations and industry best practices. Any revisions must be approved by the Corporate Safety Director and communicated to all affected parties within 30 days.