



## Couple of takeaways

- We do our best to ensure incidents do not occur and that our systems and processes protect our people, the environment and equipment. However, if an incident does occur, the best thing we can do is learn from it to try and prevent the conditions that lead to the event from happening again. Incident management and incident investigations are a key component in learning from these errors.
- The investigation process is designed to look for organisational factors and system failures and not to blame people for mistakes they may have made. It is important to remember that a robust system should allow for some human error.

## What is this procedure for?

This procedure describes how incidents involving safety, operational and the environment are managed to ensure the effects are minimised and, where required, investigated to prevent recurrence.

Incidents that are not effectively managed can result in the impact being much greater for those affected or injured, including those responding to such incidents. It is important that the HT Group has a clear process for managing all safety and environment related incidents that may occur during work or at HT managed sites, to meet our legal requirements and aid in the Incident Investigation process, preventing it from happening again. Compliance incidents not related to a safety or environment incident are managed under the Compliance Incident and Breach Management Procedure.



## Is there a difference between incident management for Hydro and contractor managed workplaces?

The following section covers how contractors need to notify and manage their incidents. The remainder of this procedure relates to Hydro managed incidents.



## What Happens When a Contractor Manages a HT Workplace?

Contractors formally appointed to manage HT Group workplaces (refer Contractor WHSE Management Procedure for further detail) are responsible for safety incidents within their control. These incidents fall outside HT's Safety Management System and Incident Management Procedure.

### Contractor Responsibilities

- Notify the **HT Job Manager** verbally as soon as practicable.
- Report via the Hydro Contractor-In-Charge Incident Reporting Tool (**Principal and Lead Contractors** only), ideally before shift end.
- Avoid personal details unless requested—use general, non-identifiable descriptions.
- Manage the incident: assess risks, investigate, implement corrective actions, and ensure compliance with your safety systems, legal, and contractual obligations.
- Share learnings to support continuous improvement and prevent recurrence.

### Hydro WHS Team

- Does not monitor, edit, or investigate contractor-submitted reports.

### HT Job Manager Role

- Review each incident to assess if any contributing factors may also classify the event as a Hydro incident requiring a SAP incident lodgement.  
Example: A contractor is injured by falling debris from HT maintenance work above. If coordination or communication was lacking, HT may have contributed. **The Job Manager** must assess accordingly.

**Enquiries:** Direct all enquiries to the **HT Job Manager** overseeing the contract.

# Incident Management



## What are the steps to take following an incident?

### Immediately after an Incident:

- Check for signs of danger to yourself and others. Put your own and the safety of others first.
- Seek appropriate assistance, including emergency response, first aid. EAP support or mental health first aid may then be required and should be actively encouraged.
- Where an ICAM investigation is likely to be required or it is a notifiable incident, preserve the incident site and ensure access is prevented. If possible, make the scene safe and minimise damage to the environment, property or assets. If in doubt, contact the WHS team and / or the Climate & Environment team.
- Ensure the Line Manager/Supervisor is informed as soon as possible, no later than within 1 hour of the incident.
- Report the incident before the end of your shift so the business can identify trends and decide if stronger controls are needed. Select 'Log an Incident' from the home intranet page and follow the prompts.

### The Line Manager/Supervisor, where relevant:

- Ensures anyone receiving an electric shock, stops work and is taken immediately to the nearest medical facility for an examination.
- Escalates incidents early where required as per the Site Incident Response Plan and Incident Management Plans.
- Consults with the WHS team and / or the Climate & Environment team to determine any regulatory reporting requirements.
- Where a Next of Kin or Emergency Contact needs to be contacted, refers to the Incident Management System – Tools, Forms, Guides & Checklists for guidance.
- Accompanies injured or ill people to receive medical treatment
- Actively encourage impacted team members to access to EAP and debriefing services. Leaders should access manager assist services if needed too.
- Consults with the incident owner to **ensure all parties are notified** in accordance with Tables 2, 3, 4, 5 and 6.

The **Incident Owner** consults with the **Line Manager/Supervisor** to determine the following, (if not the same person):

- The investigation level of the incident by referring to the Integrated Business Risk Management Standard's Risk Rating Matrix and Operational Impact Table. The assessment of risk needs to be based on potential (most *plausible* worst case impact) and how likely it could have occurred. Apply the assessment to Table 1, and **ensure all parties are notified** in accordance with Tables 2, 3, 4, 5 and 6.
- Where more than one incident type is identified (e.g compliance, operational and environment), the investigation participants, overall responsibility and methodology should be identified through consultation with each of the teams involved. In most cases, the incident type which has the highest potential risk rating would assume the responsibility and facilitate the investigation in consultation with the other teams.

**Table 1: Investigation Level**

| IBRM Risk Rating Matrix Outcome  | Investigation Level  |  |
|--|--|--|
| Potential extreme risk rating  | Level A Incident – Full ICAM Investigation and team required |  |
| Potential high risk rating   | Level B Incident – Full ICAM Investigation and team required |  |
| Potential moderate risk rating   | Level C Incident – Mini ICAM Investigation                   |  |
| <ul style="list-style-type: none"> <li>Potential low risk rating and</li> <li>Where not captured in the above risk ratings, any incident where a person receives medical treatment, requires restricted duties or requires a day or more of leave</li> </ul> | Level D Incident – Mini ICAM Investigation                   |  |

# Incident Management

- Where someone has/will receive medical treatment, have restricted duties or needs to take a day or more of leave as result of their injury/illness, ensure a **WHS Business Partner** either leads the investigation or supports the investigation with expertise.
- An ICAM investigation may not be required where the root cause is certain or where an investigation is unlikely to uncover further contributing factors. In such cases:
  - For potential high and extreme incidents, the **Incident Owner** must consult with the **WHS team or Production & Environment Level 2 Manager** before making this decision.
  - For potential moderate and low risk incidents, the **Incident Owner** must use their own discretion and judgement as to whether an investigation is required.
  - In all cases, the **Incident Owner** must identify the reason why no investigation is required and clearly detail this in SAP.

Once the risk assessment has been completed, the **Incident Owner** and the **Line Manager/Supervisor**, must also ensure:

- Operational incidents**, the Operational Assurance Manager is contacted, so the Operational Assurance Team can appoint the Lead Investigator. Workers directly involved will be stood down without prejudice, pending the investigation outcome.
- Environmental incidents**, the site may need to be managed to reduce further harm. Contact a member of the Climate & Environment team if further advice is required. If applicable, a member of the Climate & Environment team will notify the relevant regulator.
- For marine incidents involving a Hydro Group vessel**, a manager of the WHS Team notifies the National Regulator (AMSA) as soon as practicable and provides a written report in an approved form within 72 hours, if the incident results in:
  - Death, serious injury to, or loss of a person
  - Loss of, or significant damage to a vessel.
- WHS Notifiable Incidents**, consult with the WHS team to determine whether an incident is regarded as notifiable. If applicable, a member of the WHS team will notify the regulator.

**Note:** The EGM of the relevant business unit and the legal team are to review incident reports of notifiable incidents prior to submission to the regulator.

- Compliance incidents**, where an incident is identified or suspected to be a compliance incident or breach (as defined in the relevant Hydro Tasmania Compliance Plan), the Corporation Compliance team are to be contacted for further advice.

The **Incident Owner** will be notified of the incident via their SAP inbox. As per the SAP work instruction, the Incident Owner opens the record, reviews the incident details, the risk assessment and, after speaking with them, inputs the **Lead Investigator**.

The **Lead Investigator** will be notified of the incident via their SAP inbox. The **Lead Investigator** (in consultation with the investigation team, line management, workers, relevant involved parties and subject matter experts):

- Checks that the notifications were made as described in Tables 2, 3, 4, 5 and 6 noting that these are the ideal process of communication and may not always be practical or possible.
- Ensures the reporting timings in Table 6 are met.
- Identifies if any similar incidents have occurred by reviewing SAP, incident alerts and any other sources of information, where necessary.
- Determines the root cause of the incident, using the applicable ICAM process including a timeline and the “5-Whys”.
- Identifies the corrective actions to be implemented to prevent a recurrence of the incident, ensuring the actions do not in themselves cause other hazards.
- Ensures that the corrective actions decided address each absent/failed defence and organisational factor identified through the analysis.
- Encourage any parties involved with the incident, including themselves, to access the EAP, debriefing services or manager assist services, if they suspect they may be required.

Once the investigation report is completed, the **Lead Investigator**:

- Provides the final report to the Incident Owner for review and approval.

# Incident Management

- Ensures the final report is reviewed by the EGM of the relevant business unit, the legal team and the WHS team for notifiable incidents prior to submitting to the regulator.
- Once approved, uploads the final report and associated documents to SAP.
- Prior to assigning corrective/preventative actions, discuss actions with the appropriate personnel. (ie IO and proposed action owners)
- Ensure the investigation findings, causes and corrective actions are recorded in SAP as per the SAP work instruction.
- Where responsible, produces and releases communications as per the Communications and Consultation Procedure.

When the report has been finalised, the **Incident Owner** will:

- Monitor the close-out of those corrective actions, and ensure the due dates are met.
- Ensuring the evidence of the corrective actions is adequate and also attached to the SAP record, *before* closing the incident in SAP.
- Ensure the Key Lessons Learnt and corrective actions are shared in accordance with the procedure Communication and Consultation, where relevant.
- Prepare to/share the findings and outcomes with managers for reporting at LT WHS/ENV and/or Board.

**Corrective Action Owner** is to complete assigned tasks within the required timeframe and attach evidence of completion in the SAP record.

For reporting purposes, the Occupational Safety and Health Administration's injury and illness classifications are used to define recordable safety incidents. Incidents are included in the calendar month based on the date reporting, not the date of occurrence.

# Incident Management

**Table 2. Level A - Notification and Investigation Schedule – Full ICAM**

| Person Notifying                                 | Persons Notified   | Schedule and Outputs   |
|--|--|--|
| Employees and Contractors<br>(Reporting Person)  | Supervisor or Line Manager   | Immediately once area is safe and no later than 1 hour   |
|  | Incident Owner<br>WHS and Climate & Environment Teams              | Notification in SAP (support may be needed with entering data) by end of shift   |
| Supervisor or Line Manager                       | Level 2 Manager<br>WHS Manager<br>Production & Environment Manager | Immediately once area is safe and personnel safety issues secured  |
| Level 2 Manager                                  | Level 1 Manager  | Immediately once area is safe and personnel safety issues secured  |
| Level 1 Manager                                  | CEO  | Immediately  |
| CEO  | Board of Directors   | Immediately  |
| WHS Leader/Manager<br>Climate & Environment team | Legal and Compliance   | Immediately for Notifiable Incidents   |
|  | WorkSafe, EPA, AMSA or other state regulator                       | Notifiable Incidents Only<br>WorkSafe - Verbal immediately upon becoming aware and written notification within 48 hours<br>EPA – Within 24 hours<br>AMSA – Verbal immediately upon becoming aware and written notification within 72 hours |
|  | Executive Leadership Team and Whole of Business                    | Weekly Incident Report<br>LT WHS/ENV Report<br>WHS Board Report<br>Any communications  |

**Table 3. Level B – Notification and Investigation Schedule - Full ICAM**

| Person Notifying                                 | Persons Notified  | Schedule and Outputs   |
|--|---|--|
| Employees and Contractors<br>(Reporting Person)  | Supervisor or Line Manager  | Immediately once area is safe and no later than 1 hour   |
|  | Incident Owner<br>WHS and Climate & Environment Teams                     | Notification in SAP (support may be needed with entering data) by end of shift   |
| Supervisor or Line Manager                       | Level 2 Manager<br>WHS Leader/Manager<br>Production & Environment Manager | Immediately once area is safe and personnel safety issues secured  |
| Level 2 Manager                                  | Level 1 Manager   | Immediately once area is safe and personnel safety issues secured  |
| Level 1 Manager                                  | CEO   | Next LT meeting (monthly report) or at manager's discretion  |
| CEO  | Board of Directors  | Next board meeting (monthly report) or at CEO's discretion   |
| WHS Leader/Manager<br>Climate & Environment team | Legal and Compliance  | Notifiable Incidents within 12 hours   |
|  | WorkSafe, EPA, AMSA or other state regulator                              | Notifiable Incidents Only<br>WorkSafe - Verbal immediately upon becoming aware and written notification within 48 hours<br>EPA – Within 24 hours<br>AMSA – Verbal immediately upon becoming aware and written notification within 72 hours |
|  | Executive Leadership Team and Whole of Business                           | Weekly Incident Report<br>LT WHS/ENV Report<br>Any communications  |

# Incident Management

**Table 4. Level C - Notification and Investigation Schedule – Mini ICAM**

| Person Notifying                             | Persons Notified   | Schedule and Outputs  |
|--|--|---|
| Employees and Contractors (Reporting Person) | Supervisor or Line Manager                               | Immediately once area is safe and no later than 1 hour  |
|  | Incident Owner WHS and Climate & Environment Teams       | Notification in SAP (support may be needed with entering data) by end of shift  |
| Supervisor or Line Manager                   | Incident Owner, WHS Team or Climate and Environment Team | Immediately once area is safe and personnel safety issues secured   |
| Incident Owner                               | WHS Team Climate & Environment Team                      | Ensure notification through SAP by end of shift   |
| Level 2 Manager                              | Level 1 Manager, CEO                                     | Next LT meeting (monthly report) or at Manager's discretion   |
| CEO  | Board of Directors                                       | Next board meeting (monthly report)   |
| WHS Team or Climate and Environment Team     | Legal and Compliance                                     | Notifiable Incidents within 12 hours of occurrence.   |
|  | WorkSafe or other state regulator (where required)       | WorkSafe - Verbal notification immediately upon becoming aware. Written notification within 48 hours. EPA – within 24 hours of incident, when applicable. |
|  | Executive Leadership Team and Whole of Business          | Weekly Incident Report (WHS only)<br>LT WHS/ENV Report<br>Any communications  |

**Table 5: Level D – Notification and Investigation Schedule - Mini ICAM**

| Person Notifying                             | Persons Notified                                   | Schedule and Outputs   |
|--|--|--|
| Employees and Contractors (Reporting Person) | Supervisor or Line Manager                         | Immediately once area is safe and no later than 1 hour                         |
|  | Incident Owner WHS and Climate & Environment Teams | Notification in SAP (support may be needed with entering data) within 24 hours |
| Supervisor or Line Manager                   | Incident Owner                                     | Immediately once area is safe and personnel safety issues secure               |
| Incident Owner                               | WHS Team Climate & Environment Team                | Ensure notification through SAP within 24 hours                                |
| WHS Team                                     | Executive Leadership Team and Whole of Business    | Weekly Incident Report   |
|  | Legal and Compliance                               | Notifiable Incidents (i.e. a breach) within 12 hours of notification.          |
| Climate & Environment Team                   | EPA  | EPA – notified within 24 hours of incident occurring, when applicable.         |
|  | Legal and Compliance                               | Notifiable Incidents (i.e. a breach) within 12 hours of notification.          |

# Incident Management

| Table 6: Reporting Requirements   | Level A               | Level B               | Level C                 | Level D                |
|---|-----------------------|-----------------------|-------------------------|------------------------|
| Who appoints the Investigation team?<br>(investigation team should consist of non-managerial workers) | Level 1 Manager       | Level 2 Manager       | Incident Owner          | Incident Owner         |
| Investigation Lead to be ICAM Lead Investigator trained   | Yes                   | Yes                   | Mini-ICAM only          | Mini-ICAM only         |
| Manager participation required for PEEPO and Contributing Factors process                             | Level 1 Manager       | Level 2 Manager       | Line Manager/Supervisor | N/A                    |
| Notification in SAP   | By end of shift       | By end of shift       | By end of shift         | Within 24 hours        |
| Investigation completion timing   | Within 72 Hours       | Within 72 Hours       | Not applicable          | Not applicable         |
| ICAM Report template completion for final report submission   | Within 5 working days | Within 5 working days | Not applicable          | Not applicable         |
| Mini-ICAM template completion for final report submission   | Not applicable        | Not applicable        | Within 10 working days  | Within 10 working days |
| Level required for review and approval of final report  | CEO                   | Level 2 Manager       | Incident Owner          | Incident Owner         |
| Details included in monthly WHS LT and Board Report OR quarterly Climate & Environment LT Report      | Yes                   | Yes                   | Yes                     | No                     |

*Note:* Fixed timeframes may be negotiated with the WHS or Climate and Environment team based on circumstances (e.g. waiting on investigation evidence etc.).