



An Initiative of the  
American Staffing Association  
and National Safety Council

## How to Conduct an Incident Investigation

Your temporary worker has just experienced an incident resulting in an unintentional injury at your customer's worksite. Now what? Reacting quickly to the incident with a prescribed procedure and actions can demonstrate your company's commitment to safety to both your customer and injured worker and ensure the proper information is collected to fulfill an incident investigation's ultimate purpose – to prevent future incidents.

**Steps in an Investigation Process** - The investigation process should begin after arranging for first aid or medical treatment for the injured person(s). In getting started, remind everyone involved--especially workers--the investigation is to learn and prevent, not find fault. It is advantageous to involve the customer in the investigation process because: a) their supervisors are often the people who were present at the time of the incident; b) they are most familiar with the worksite and are the subject matter experts on any equipment that may have been involved; and c) some of their full-time direct employees may need to be involved in the process or serve as witnesses.

Steps of the investigation process include:

1. As much as possible, ask the customer to secure the area where the injury occurred and preserve the work area as it is (especially for serious incidents).
2. Locate and take with you to the customer worksite your investigation kit.
3. Visit the customer site to conduct the investigation with the host employer; obtain a copy of the customer's investigation report as well, if one has been completed.
4. Identify and gather witnesses to the injury event.
5. Interview the involved worker.
6. Interview all witnesses or get statements from the customer taken from the witnesses.
7. Document the scene of the injury through photos or videos if your customer permits.
8. Complete the investigation report, including determination of what caused the incident and what corrective actions your customer will take to prevent recurrences.
9. Ensure follow up with your customer and temporary workers on assignment about completion of corrective actions.

**What to Include in the Documented Investigation Process** - As with many processes, preparation and documentation are crucial. As part of the injury and illness prevention program, the investigation procedure should detail:

- Who should conduct and participate in the investigation
- Incidents to be investigated
- Information to be collected
- Identification of casual factors (often referred to as root causes)
- Determination of corrective actions

- Tracking completion of corrective actions

*Who is involved* - Normally, the investigation is conducted by the injured worker's immediate supervisor or safety personnel at the customer worksite with the assistance of the staffing agency. In cases involving a serious incident or fatality, senior management personnel, engineering staff, or legal counsel from both the customer and the staffing agency may also be involved. Those participating in the investigation would include the injured worker, witnesses to the incident or events preceding it, the injured worker's immediate supervisor or customer representative and the staffing agency. The injured worker may also request the presence of an employee representative during the interview if contractual agreements are in place.

*What gets investigated* - Any incident resulting in a fatality or serious injury should be thoroughly investigated. To aid in predicting and preventing future incidents, however, it is also recommended that your customer investigate all recordable, first aid, and near miss incidents. Your customer should always report all incidents to the staffing agency no matter how minor.

*Information to collect* - The type of information that should be collected during the investigation process includes (partner with your customer to gather this information to the best of your ability):

- Worker characteristics (age, gender, department, job title, experience level, tenure in job, and training records)
- Injury characteristics (describe the injury or illness, part(s) of body affected, and degree of severity)
- Narrative description and sequencing of events (location of incident; complete sequence of events leading up to the injury or near miss; objects or substances involved in event; conditions such as temperature, light, noise, weather; how injury occurred; whether preventive measure had been in place; what happened after injury or near miss occurred)
- Characteristics of equipment associated with incident (type, brand, size, distinguishing features, condition, specific part involved)
- Characteristics of the task being performed when incident occurred (general task, specific activity, posture and location of injured worker, working alone or with others)
- Time factors (time of day, hour in injured worker's shift, type of shift, phase of worker's day such as performing work, break time, mealtime, overtime, or entering/leaving facility)
- Supervision information (at time of incident whether injured worker was being supervised directly, indirectly, or not at all and whether supervision was feasible)
- Causal factors (specific events and conditions contributing to the incident)
- Corrective actions taken by your customer (immediate measures taken, interim, or long-term actions necessary)

*What to have on hand* - In order to be prepared to complete an investigation promptly following an incident, it is best to have prepared a kit ahead of time that includes:

- Investigation forms
- Interview forms
- Camera or video recorder (if allowed by customer)
- Voice recorder (refer to legal counsel)

- Measuring tape
- Flashlight

*Interviewing people* - Interviewing injured workers and witnesses necessitates reducing their possible fear and anxiety and developing a good rapport. Interviews should follow these steps:

1. State the purpose of the investigation and interview is to do fact-finding, not fault-finding.
2. Ask the individual to recount their version of what happened without interrupting. Take notes or record their response (contact staffing agency legal counsel if planning to record).
3. Ask clarifying questions to fill in missing information.
4. Reflect back to the interviewee the factual information obtained. Correct any inconsistencies.
5. Ask the individual what they think could have prevented the incident, focusing on the conditions and events preceding the injury.

*Determining causal factors* – The purpose of all this fact-finding is to determine all the contributing factors to why the incident occurred. Statements such as “worker was careless” or “employee did not follow safety procedures” don’t get at the root cause of the incident. To avoid these incomplete and misleading conclusions in your investigative process, continue to ask “Why?” as in “Why did the employee not follow safety procedures?” Contributing factors may involve equipment, environment, people, and management. Your customer will likely be in the best position to assist you in answering these questions. Questions that help reveal these may include:

1. Was a hazardous condition a contributing factor? (defects in equipment/tools/materials, condition recognized, equipment inspections, correct equipment used or available, substitute equipment used, design or quality of equipment)
2. Was the location of equipment/materials/worker(s) a contributing factor? (employee supposed to be there, sufficient workspace, environmental conditions)
3. Was the job procedure a contributing factor? (written or known procedures, ability to perform the job, difficult tasks within the job, anything encouraging deviation from job procedures such as incentives or speed of completion)
4. Was lack of personal protective equipment or emergency equipment a contributing factor? (PPE specified for job/task, adequacy of PPE, whether PPE used at all or correctly, emergency equipment specified, available, properly used, function as intended)
5. Was a management system defect a contributing factor? (failure of supervisor to detect or report hazardous condition or deviation from job procedure, supervisor accountability understood, supervisor adequately trained, failure to initiate corrective action)

*Completing report and documenting corrective actions* - At this point, once you and your customer have gathered information and interviewed the involved worker and any witnesses, you can prepare your staffing agency investigation report and formulate what you feel may be appropriate corrective actions to share with your customer. Your company should have determined who the report is sent to, within what timeframe, and what if any information gets communicated to workers, management, or gets filed or posted by your agency. It is important to remember that your customer—who controls the worksite—will ultimately have the responsibility to implement the proper corrective actions. However, the staffing agency should communicate with the customer and other assigned employees to the best of its ability to ensure these corrective actions have indeed been implemented.

Your role in assisting your customer in completing an incident investigation is an important one. You should be reasonably assured that your customer has taken appropriate actions (to the best of their ability) to prevent future incidents from occurring to your temporary staff working onsite. As an industry best practice, it is recommended that you withhold placement of additional employees into a job where an injury has occurred until a thorough and complete investigation has been completed.