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1. OBJECTIVE

This procedure specifies the requirements for the immediate response to, and subsequent reporting, analysis, and communication of incidents. It also provides guidance on the determination of appropriate corrective actions.

2. SCOPE

This procedure applies to:

- a person conducting a business or undertaking (PCBU) for or on behalf of Pilbara Ports on a Pilbara Ports site, and all licensees and lessees; and
- any incident that has an actual or potential impact to environment and/or cultural heritage values within the boundary of lands, water and/or seabed vested to the Pilbara Ports, or under management order of the Pilbara Ports.

3. DEFINITIONS

Table 1: Definitions

TERM	DEFINITION
Basic Analysis	A basic form of investigation to identify the causal factors of an incident.
Certificate of Capacity	Is an official document completed by a medical practitioner that describes an injury, illness, capacity to work, and any limitations that an injured worker has.
Corrective Action	Action to eliminate or reduce future risk.
Cultural Heritage Impact	An unplanned or uncontrolled event that has potential to result in adverse impacts to cultural heritage values. Cultural heritage values include Aboriginal, historic, and maritime heritage sites, places, artefacts, and objects.
Detailed Analysis	A detailed form of investigation that identifies the root cause of an incident. Detailed Analysis requires the use of a recognised investigation tool, such as ICAM or Taproot.
Emergency	Is an abnormal occurrence that can pose a threat to the safety or health of employees, contractors, local communities, customers, or which can cause significant damage to assets or the environment. An emergency declared by a Pilbara Ports Harbour Master means an immediate, current, or imminent event, threat, or contingency that Pilbara Ports considers will or may adversely affect or endanger any one or more of: <ul style="list-style-type: none"> • the health or safety of any person; • private or public property of any kind; or • the Environment, within the designated operating area or otherwise at the Port.
Environment Impact	An unplanned or uncontrolled event that has potential to result in adverse impacts to the environment.
Evidence	Object or information used to prove the existence or truth of something.
First Aid Injury	A work-related injury that requires first aid treatment only and the injured person would typically return to work. Such

TERM	DEFINITION
	treatment is considered first aid even if administered by a medical practitioner.
Incident	Any unplanned event that resulted, or could have resulted, in injury, ill health, damage or other loss, or environmental harm. Note – Psychosocial Incident is further defined in this table.
Incident Analysis	Analysis of all evidence relevant to an Incident, with the objective of determining the root cause and other causal factors, and determination of appropriate corrective actions.
Incident Classification	Impact type resulting from an Incident. Incidents are classified as either <ul style="list-style-type: none"> • Environment; • Cultural Heritage Impact; • Injury; • Marine Event; • Near Miss; • Production Loss; • Property or Damage Loss; or • Security Event.
Incident Management System	Pilbara Ports' online incident and hazard reporting database.
Incident Report	Record of events surrounding an incident, in the form of an incident report form or incident management system report.
Initial Report	The initial entry into the incident management system which has not been reviewed and confirmed as a valid incident report.
Injury Classification	The classification an injury has been given, which is based on the outcome of any treatment given. Injuries are classified as <ul style="list-style-type: none"> • Minor Injury – No Treatment; • First Aid Injury; • Medical Treatment Injury; • Restricted Work Injury; • Lost Time Injury; • Disabling Injury / Illness (non-recoverable); or • Fatality. Injuries that occur at work but that are outside the control of Pilbara Ports, that is, Pilbara Ports could not have reasonably prevented the injury, are not considered a work-related injury.
Level 1 Incident	An incident with a plausible maximum consequence of insignificant, minor, or medium.
Level 2 Incident	An incident with a plausible maximum consequence of major or catastrophic but is not a level 3 incident.
Level 3 Incident	An incident where the life /health plausible maximum consequence is catastrophic and either: <ul style="list-style-type: none"> • there was a failure of all the required controls and a person was in the line of fire or otherwise directly exposed to the hazard; or • a person was injured.

TERM	DEFINITION
Line Manager	The person who is directly responsible for managing the work of someone else, and who is one level above that person.
Lost Time Injury	A Medical Practitioner instructs that the injured person is totally unfit for work for a minimum of one full rostered shift or more.
Marine Event	An unplanned event involving a vessel at sea or within port-controlled waters, with potential to cause an incident or disrupt the shipping schedule.
Medical Treatment Injury	<p>A work-related injury where the injured person requires treatment which cannot be administered on site due to the complexity or need for prescription medication. This does not include the conduct of diagnostic procedures such as x-rays, ECG's, blood tests etc. where there is no further medical treatment required.</p> <p>A Medical Certificate stating fit for full duties is required. If restrictions or time off is prescribed, a higher classification will apply (i.e., Restricted Work Injury or Lost Time Injury).</p>
Minor Injury – No Treatment Required	A work-related injury where the injured person requires no injury treatment. Typically, this is used where an injured person reports that they felt some injury or discomfort, but no treatment is required.
Near Miss	An unplanned event or loss of control which does not result in injury, illness, damage, or any other impact, but with potential to do so (excluding marine).
Notifiable Incident	<p>A notifiable incident is:</p> <ul style="list-style-type: none"> • The death of a person; or • A serious injury or illness of a person; or • A dangerous incident. <p>Refer to section 7.1 of this procedure for more information.</p>
Psychosocial Incident	Workplace psychosocial incidents are incidents that are related to the psychological and social conditions of the workplace rather than just the physical conditions. These include stress, fatigue, bullying, violence, aggression, harassment and burnout, which can be harmful to the health of workers and compromise their wellbeing.
Production Loss	An unplanned loss of production which has not resulted from an injury, damage, near miss or other event classification.
Property or Damage Loss	Plant, equipment, or any other asset is damaged as a result of the incident.

Regulator	Is the WorkSafe Commissioner who is responsible for performing the functions and exercising the powers of the regulator under the Work Health and Safety Act 2020.
Recording Only Incident	<p>An incident classified as 'Recording Only' in the Pilbara Ports incident management system serves to maintain a record for informational purposes. These incidents are not actively managed by Pilbara Ports as they fall outside of its jurisdiction or control.</p> <p>An incident is deemed 'Recording Only' if it meets any of the following criteria:</p> <ul style="list-style-type: none"> • It occurred outside Pilbara Ports controlled areas, such as leased areas, external port waters, roads, or berth operations not under Pilbara Ports jurisdiction. • It took place on a vessel who operates under their Safety Management System and does not impact or involve Pilbara Ports. • It involves workers with automatic right of entry to Pilbara Ports sites, whom Pilbara Ports cannot legally direct (e.g., Police, Australian Maritime Safety Authority, Biosecurity), and the incident is not caused by Pilbara Ports. • It occurred outside a worker's hours of work or outside Pilbara Ports-provided accommodation, excluding transit units. This includes travel-related incidents while transiting to or from work. • As directed by the Health and Safety Manager.
Responsible User	The person assigned responsibility for an incident in the incident management system to complete an incident report.
Restricted Work Injury	A work-related injury where a medical practitioner prescribes alternate or restricted duties or hours of work for a minimum of one full rostered shift or more, and the injured person is unable to complete their normal duties. If restrictions are applied but the injured person is able to complete their normal work tasks, then a lower form of injury classification applies.
Reviewer	The person assigned responsibility for an incident in the incident management system to review a completed incident report and to close it.
Significant Incident	An incident with an actual consequence or a plausible maximum consequence of high or catastrophic (both level 2 incidents and level 3 incidents are significant incidents).
Security Event	<p>Events include but are not limited to:</p> <ul style="list-style-type: none"> • Unauthorised personnel on site; • A person in a Landside Restricted Zone or Waterside Restricted Zone without an MSIC or not being continually escorted or monitored by the holder of an MSIC; • Unauthorised or improperly parked (suspicious) vehicle/s on site;

	<ul style="list-style-type: none"> • Unauthorised or suspicious vessel/s moored at the port facilities; • Bomb threat; • Suspicious persons or activity in the port facilities or in the immediate vicinity of the ports; • Loss of electrical power due to suspicious or unauthorised activity; • Discovery of unknown or suspicious package/s within the port; • Breach of a perimeter fence; • Evidence of tampering with equipment, security systems, doors, windows, locks, and other access points on any Pilbara Ports buildings; and • Unlawful interference in the lands or waters of a Security Regulated Port.
Task Supervisor	A worker assigned to supervise other workers perform a specific task with the intention to provide an increased level of hazard management and risk control.
Witness Statement	A document recording the evidence of a person, which is typically signed by them to confirm that the contents of the statement are true. A statement should record what the witness saw, heard, or felt.

4. RESPONSIBILITIES

Table 2: Responsibilities

ROLE	RESPONSIBILITIES
Managers, Superintendents and Supervisors	<p>Understand and comply with the requirements of this procedure.</p> <p>Ensure that personnel under their control are aware of, understand and comply with the requirements of this procedure.</p>
Workers and vendors	Comply with the requirements of this procedure.
Visitors	Comply with all reasonable instructions given by their escort. Report any Incidents to their escort.

5. IMMEDIATE INCIDENT RESPONSE

In the event of an emergency, an involved party or witness must raise the alarm immediately in accordance with section 6.2 of this procedure.

In cases where a person sustains or is suspected to have sustained an injury, an appropriate level of medical assistance must be sought as a priority.

5.1 Securing and Releasing the Scene of an Incident

Following an incident, the scene must be made safe as soon as practicable, and access to the area restricted to those involved in evidence collection. The Task Supervisor or delegate, or where there is no Task Supervisor or another suitable person, must commence evidence collection as soon as practicable. Where

appropriate, witness statements must be recorded, preferably by using the Witness Statement Form.

Incidents that may be reportable to a regulator or classified as a significant incident (level 2 and level 3 incidents) may only be released after appropriate corrective actions have been implemented to reduce the risk of further incidents and with the approval of the relevant department manager.

Note: Some incidents that are required to be reported to a regulator, the WA Police or other government department or agency, may require the scene to be preserved for their inspection. When this is the case, the scene must not be disturbed until express authorisation is obtained from the relevant body, except where required to prevent further injury, assist an injured person, remove a deceased person, minimise environmental impact or to otherwise make the area safe.

6. INCIDENT REPORTING (INTERNAL) – EXCLUDING PSYCHOSOCIAL

Incidents must be reported to as soon as practicable to:

- an appropriate Line Manager or Task Supervisor;
- the relevant VTSC, where the incident is an emergency or marine event (refer to Table 1 for contact details); and
- a Contract Coordinator, Contract Owner, Pilbara Ports Representative (Licence) or escort where the incident involves a vendor or visitor (as relevant).

Significant incidents (level 2 incidents and level 3 incidents) must be reported through line management to the CEO as soon as practicable.

Records of all incidents must be made into Pilbara Ports' incident management system (IMS). Links to the IMS are available on Pilbara Ports' Intranet and Internet pages. The Line Manager, Task Supervisor, Contract Coordinator, Contract Owner or Pilbara Ports Representative (Licence) as relevant must ensure the incident is reported into the IMS before the end of the shift, or where this is not practicable, at the earliest opportunity. Subsequent findings must be recorded in the IMS in accordance with the timeliness standards outlined in section 10 of this procedure.

6.1 Significant Incident (level 2 and level 3 incidents) Reporting

The relevant department manager should notify the Pilbara Ports 'Internal Incident Alert Group'¹ of significant incidents (level 2 and level 3 incidents) by email, using the 'Internal Incident Alert Group' distribution list, as soon as practicable. This email distribution list may also be used to alert the group to other incidents when deemed appropriate.

The line manager must also prepare a significant incident notification for the relevant department manager, general manager, and Chief Executive Officer. The significant incident notification is completed using the Significant Incident Notification Template form available on DMS. The completed form should be sent

¹ Incident.AlertGroup@pilbaraports.com.au

the same day as the incident, or if this is not practical, soon after. The Chief Executive Officer must forward the completed significant incident notification to the Board for any level 3 incident. It is at the Chief Executive Officer's discretion if the significant incident notification is sent for level 2 incidents.

6.2 Emergency Event Reporting – Raise the Alarm

All emergencies must be reported to Pilbara Ports' Vessel Traffic Services Centre (VTSC) (refer to Table 3) by the most expedient means and where appropriate the relevant emergency services organisation (000).

Table 3: Emergency Contact Details

EMERGENCY COMMUNICATION	
Emergency Contact	Phone Number / Radio Channel
Emergency Services (fire, police, ambulance)	000
Port Hedland VTSC – 24 Hours	Landline: (08) 9173 9030 Mobile: 0438 303 708 Mobile: 0427 842 740 VHF Radio: CH12 / CH16
Dampier/Ashburton VTSC – 24 Hours	Landline: (08) 9159 6556 Mobile: 0428 888 800 VHF Radio: CH11 / CH16

6.3 Injury Response

Where a person is injured, they must seek appropriate first aid, and if required, further medical treatment. At Utah Point, Eastern Harbour, and Dampier, the injured person must be transported to the Security Gatehouse for first aid attention as a priority and if safe to do so. Where it is not safe to move the person, Security Gatehouse personnel must be mobilised to the scene immediately.

The Ashburton Gatehouse does not provide first aid. First aid treatment must be administered by a suitably qualified first aider on site.

At the Perth Office, first aid is completed by the trained first aiders on site.

Security Gatehouse numbers are outlined below:

- Utah Point – 9173 8911
- East Side – 9173 9043
- Dampier – 9159 6584
- Ashburton – 9159 6584

The person that provided first aid must complete a First Aid Treatment Record for all cases and submit completed forms to the Pilbara Ports Health & Safety Manager, Pilbara Ports Security Manager and relevant Pilbara Ports Security Supervisor.

If further treatment is required, the person that provided first aid must notify the Pilbara Ports Security Superintendent to advise of the status of the injured person, the nature of the injury, and the steps taken to obtain further treatment. Where a Certificate of Capacity has been issued by a Medical Practitioner for a Pilbara Ports employee, refer to the Injury Management Procedure and Workers Compensation Procedure for information about case management.

Any injury that is classified as a Lost Time Injury must be reported through line management to the Chief Executive Officer and Health & Safety Manager.

6.4 Environment/Cultural Heritage Incidents

For all environment and cultural heritage Incidents, the Line Manager, Task Supervisor, Contract Coordinator, Contract Owner or Pilbara Ports Representative (Licence) as relevant, is responsible for ensuring an initial Incident Report is submitted to the IMS before the end of the shift where practicable. Additionally, a representative of Pilbara Ports' Environment and Heritage team must be immediately notified via phone (unless otherwise agreed in writing by Pilbara Ports) of any incident with a plausible maximum consequence of moderate or higher.

6.5 Insurable Event

All insurance related incidents must be reported to the Enterprise Risk & Sustainability Advisor as soon as practicable by the Line Manager, Task Supervisor, Contract Coordinator, Contract Owner or Pilbara Ports Representative (Licence) as relevant. An insurable event could arise where the incident involves damage/loss to Pilbara Ports property, third party property and/or injury to a vendor or any other third party.

The importance of timely notification is a condition of Pilbara Ports' insurance arrangements. RiskCover require that Pilbara Ports notify them immediately upon becoming aware of the possibility of a claim arising.

6.6 Incident Risk Rating

Incidents must be assigned an actual consequence in the IMS using the risk consequence table from the Risk Management Procedure. Further to this, the plausible maximum consequence (PMC) will need to be determined representing the highest plausible consequence of the event. Incidents with multiple classifications must be risk rated using the most significant classification to determine the PMC. Consideration should be given to events and occurrences experienced by Pilbara Ports and associated parties, as well as across relevant industries or activities in Australia when determining the PMC.

6.7 Confidentiality

Incident information recorded in the incident description fields of an incident report should not identify any injured or implicated person by name.

All injury management and workers compensation information concerning an injured worker is confidential.

6.8 Record Keeping

All records must be managed in accordance with the Record Keeping Plan.

6.9 Rejection of an Initial Report

When an initial report is made into the IMS, it may be rejected as an incident. This decision is to be made by the Health and Safety or Environment and Heritage team in conjunction with the relevant department manager or Harbour Master. Circumstances in which this should be done include:

- Where the initial report would be more appropriately classified as a hazard;
- Where the initial report refers to an event outside the scope of this procedure; and
- Where the event detailed in the initial report is deemed not to have constituted an incident.

Note: Pilbara Ports may keep a record of a reported incident that is outside the scope of this procedure and mark it as "Recording Only", where keeping a record in the IMS may be helpful for future purposes. Refer to definitions table for a criteria of incidents to be triaged as recording only.

When an initial report is rejected, the IMS will automatically notify person who entered the report. If the reporter disagrees with this decision, they may raise the matter with their line supervisor and/or the relevant work area owner. Employees may also follow the Workplace Issue and Grievance Resolution Procedure and people external to Pilbara Ports may lodge a complaint².

Where an initial report that is rejected was entered by a Pilbara Ports employee then their manager should provide feedback to explain why the report was rejected. It is at the discretion of the manager to determine the appropriate audience and method of communication after considering the nature of the report.

7. INCIDENT REPORTING (INTERNAL) – PSYCHOSOCIAL INCIDENTS

Psychosocial incidents can be reported to Pilbara Ports in various ways. Examples include verbal discussions, emails and text messages, incident report forms, formal complaints or grievances, medical certificates, and workers' compensation claims.

Where a psychosocial incident is reported, it should be recorded into Pilbara Ports IMS. Psychosocial incidents reported into the IMS must be reported as a psychosocial incident. The IMS has the option to record psychosocial incidents in a way where the report is only accessible to Pilbara Ports' Health and Safety Manager and People and Capability Manager, and thus confidentiality is maintained.

When a psychosocial incident is reported and confirmed, the Health and Safety Manager and People and Capability Manager will determine who will manage the report and the investigation to be undertaken. The individual or group of workers who reported the

² Complaints may be lodged via Pilbara Port' Internet page.

incident may be consulted about how they would prefer to address it, which may be an informal or formal process.

As guidance, persons involved in formal investigations should be impartial. If a formal process is conducted, those undertaking the investigation should be competent in identifying psychosocial risk factors, sources of risk and appropriate preventative control measures. As investigations into psychosocial risk factors can be complex, input from subject matter experts (e.g., organisational psychologists, organisational development consultants, human resources consultants) may be required.

Psychosocial incident investigations should be completed within a reasonable timeframe.

8. INCIDENT REPORTING (EXTERNAL)

Some incidents, due to their nature and/or severity, may be reportable to an external party. All communications must be undertaken in accordance with the Corporate Delegations Manual.

Pilbara Ports' Health & Safety Manager must be notified of all reports submitted to a safety regulator.

Submission of a report to a safety regulator is not a substitute for submitting an incident report as described in Section 6 of this procedure but should be submitted to Pilbara Ports as an evidence document in the IMS.

8.1 Department of Mines, Industry Regulation and Safety (WorkSafe WA)

The person who conducts a business or undertaking (PCBU) who manages or controls the workplace must ensure that the Regulator is notified immediately after becoming aware that a notifiable incident arising out of the conduct of the business or undertaking has occurred.

As per Section 35 of the Work Health and Safety Act 2020 (WHS Act), a notifiable incident means:

- the death of a person;
- a serious injury or illness of a person; or
- a dangerous incident.

As per Section 36 of the WHS Act a serious injury or illness of a person means an injury or illness:

- that requires the person to have immediate treatment as an in-patient in a hospital;
- that requires the person to have immediate treatment for:
 - the amputation of any part of the person's body;
 - a serious head injury;

- a serious eye injury;
 - a serious burn;
 - the separation of the person's skin from an underlying tissue (such as degloving or scalping);
 - a spinal injury;
 - the loss of a bodily function; or
 - serious lacerations;
 - that requires the person to have treatment by a medical practitioner within 48 hours of exposure to a substance;
 - that occurs in a remote location and requires the person to be transferred urgently to a medical facility for treatment; or
 - that, in the opinion of a medical practitioner, is likely to prevent the person from being able to do the person's normal work for at least 10 days after the day on which the injury or illness occurs,
- and includes any other injury or illness prescribed by the Work Health and Safety (General) Regulations 2022 (WHS Regulations) but does not include an illness or injury of a prescribed kind.

For the purposes of Section 36 of the WHS Act, each of the following conditions is a serious illness as per Section 699 of the WHS Regulations:

- any infection to which the carrying out of work is a significant contributing factor, including any infection that is reliably attributable to carrying out work:
 - with micro-organisms;
 - that involves providing treatment or care to a person;
 - that involves contact with human blood or bodily substances; or
 - that involves handling or contact with animals, animal hides, skins, wool or hair, animal carcasses or animal waste product;
- the following occupational zoonoses contracted in the course of work involving handling or contact with animals. Animal hides, skins, wool or hair, animal carcasses or animal waste products:
 - q fever;
 - anthrax;
 - leptospirosis;
 - brucellosis;
 - hendra virus;
 - avian influenza; and
 - psittacosis.

As per Section 37 of the WHS Act a dangerous incident means an incident in relation to a workplace that exposes a worker or any other person to a serious risk to a person's health or safety emanating from an immediate or imminent exposure to:

- an uncontrolled escape, spillage, or leakage of a substance;
 - an uncontrolled implosion, explosion, or fire;
 - an uncontrolled escape of gas or steam;
 - an uncontrolled escape of a pressurised substance;
 - electric shock;
 - the fall or release from a height of any plant, substance, or thing;
 - the collapse, overturning, failure, or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations;
 - the collapse or partial collapse of a structure;
 - the collapse or failure of an excavation or of any shoring supporting an excavation;
 - the inrush of water, mud, or gas in workings, in an underground excavation or tunnel;
 - the interruption of the main system of ventilation in an underground excavation or tunnel; or
 - any other event prescribed by the WHS Regulations,
- but does not include an incident of a prescribed kind.

8.2 Department of Mines, Industry Regulation and Safety (Building and Energy)

The relevant department manager is responsible for reporting the following:

- electric shocks and accidents, (including electrical fatalities), irrespective of their seriousness, to Horizon Power on 132 351 in accordance with the *Electricity (Licensing) Regulations 1991*, where Horizon Power is the network operator. In the event where the network operator is not known (i.e., off a generator power source), the relevant manager must notify Building and Energy division of DMIRS; and
- all incidents, such as near misses, injury to persons or property damage relating to fuel gas (Natural Gas, LP Gas, CNG, LNG), in accordance with Regulation 42 of the *Gas Standards (Gasfitting and Consumer Gas Installations) Regulations 1999*.

8.3 Department of Health

Certain Incidents involving potable water may create health risks are required to be reported. Refer to the Potable Water Quality Management Plan for reporting requirements.

8.4 Environment and Heritage Incidents

8.4.1 Reporting to Environment and Cultural Heritage Regulators

Pilbara Ports is required to report environment and cultural heritage Incidents to relevant State and Federal environment and heritage regulators. Such reporting may be triggered by the requirements of statutory approval issued to Pilbara Ports, or legislative requirements.

Further to this, Pilbara Ports has made a general commitment to voluntarily notify the Department of Water and Environmental Regulation (DWER) if:

- discharge of waste within Pilbara Ports' port waters in circumstances likely to cause pollution; or
- emissions that result, or are likely to result in, the discharge or abandonment of waste in water to which the public has access (i.e., incidents where there is potential for community exposure / concern);

notwithstanding the absence of a legal obligation to do so.

Importantly, when such notifications are made, Pilbara Ports' Environment and Heritage team must clearly state that they are not made under section 72 of the *Environment Protection Act 1986* but are rather voluntary disclosures to the DWER.

8.4.2 Triggers for Reporting to Western Australian Cabinet Ministers

In 2011, the Western Australian (WA) Environmental Protection Authority (EPA) released a protocol for reporting environmental breaches in WA Ports to WA Cabinet Ministers. The protocol serves to ensure that certain WA Cabinet Ministers receive timely and appropriate advice of breaches that have potential health or environmental consequences and may escalate to stimulate media interest at a local and / or State level.

Under this protocol, reporting is required where an environmental Incident in WA Ports triggers any one of the following criteria:

- exceeds criteria for lead or nickel by any amount;
- potentially poses a risk to human health or the environment;
- has had significant community interest;
- has a history of significant non-compliance; and
- subject to EPA assessment which has significant community interest.

If Pilbara Ports is responsible for an environmental Incident, it required under this protocol to immediately advise the Minister for Transport and Department of Transport at the time it reports the incident through to the DWER.

8.5 Australian Maritime Safety Authority (AMSA)

The master of all vessels within a Pilbara Ports Port Boundary must report all matters that are prescribed under Section 18 of the *Transport Safety Investigations Act 2003* or incidents, or occurrences prescribed by or Sections 185, and 186 of the *Navigation Act 2012* or by section 107 of the *Occupational Health and Safety (Maritime Industry) Act 1993* to AMSA via Form 18 Incident Alert and Form 19 Incident.

Pilbara Ports must be advised of the Incident and provided a copy of the Form 18 and 19.

All marine pollution Incidents must be reported to the AMSA Rescue Coordination Centre (RCC) (24 hours) on 1800 641 792 and followed by an online Pollution Report Form (POLREP).

Refer to Marine Pollution Contingency Plan for the applicable Port for more information on marine pollution reporting.

8.6 Department of Transport (DoT)

All marine pollution Incidents must be reported to the DoT Maritime Environmental Emergency Response (MEER) duty officer (24 hours) on (08) 9480 9924 and followed by an online Pollution Report Form (POLREP).

Refer to Marine Pollution Contingency Plan for the applicable Port for more information on marine pollution reporting.

8.7 WA Police

Reports of matters which are reportable to the WA Police must be made by the relevant department manager in consultation with their General Manager.

8.8 Security Incidents

Security incidents must be reported in accordance with the Security Incident Reporting Procedure.

9. INCIDENT ANALYSIS (EXCLUDING PSYCHOSOCIAL INCIDENTS)

Significant incidents, (level 2 and level 3 incidents), must be subject to a detailed analysis. A detailed analysis may be required for other incidents at the discretion of the relevant Pilbara Ports department manager.

All other incidents must be subject to a Basic Analysis.

Refer to Sections 8.2 and 8.3 for more information on basic and detailed analyses.

9.1 Evidence

The collection of all relevant evidence relating to all incidents should be coordinated by the Task Supervisor or delegate and commence immediately following the incident or as soon as practicable.

Types of evidence that may be collected include:

- People: Licenses, training and competency records, drug and alcohol screens and fatigue assessments;
- Environment: Photos of the physical environment, describe surface conditions (sealed / unsealed land), what was the receiving environment, what remediation efforts were conducted, and describe / record weather conditions;
- Equipment: Photos showing the condition of vehicles, equipment and tools, placement of barricades and signs, evidence of prestart, PPE;

- Process: Evidence of procedures implemented, job hazard analyses prepared, evidence of workplace inspections, compliance to standards and legislation, review of past audits and their effectiveness;
- Organisation: Organisational structure and chain of command, clarity of communication, effectiveness of supervision, appropriateness of company policies, health of reporting culture; and
- Maps /diagrams: maps or diagrams marking the location of the Incident.

9.2 Basic Analysis

A basic analysis should be conducted by the Task Supervisor or delegate. The investigation should consist of a basic 'timeline' and the identification of causal factors. A basic '5 why' is an example of a suitable basic analysis. Relevant evidence must be attached to the report. Corrective actions must be implemented.

The IMS report must be updated to reflect the findings and corrective actions.

9.3 Detailed Analysis

A detailed analysis must be conducted in accordance with a root cause analysis method.

9.3.1 Analysis Team

The department manager or delegate must mobilise an analysis team (the team) as soon as practicable.

The team should comprise of the following as a minimum:

- a facilitator;
- a Pilbara Ports Health and Safety team member or Pilbara Ports Environment & Heritage team member as appropriate;
- another worker from the same department who was not involved in the incident or other person who may be helpful in the investigation (a Health and Safety Representative must be invited); and
- a subject matter expert where appropriate.

9.3.2 Analysis Workshop

The department manager or delegate must convene a workshop as soon as practicable after the collection of evidence, at a time convenient to the team, to complete the analysis. The department manager may request assistance from a Health and Safety or Environment and Heritage team member in facilitating the analysis.

9.4 Analysis Findings

The following guiding principles must be applied in all analyses:

- analysis findings must be evidenced to be declared as fact;
- presumptions must be declared as such; and
- final analysis findings must be recorded in the IMS report.

Detailed analyses also require that:

- the team reach consensus on contributing factors and root causes;
- corrective actions are considered to address each finding;
- the analysis team does not make recommendations on disciplinary action, but may refer the incident to People and Capability for them to consider disciplinary action;
- the report be prepared by the facilitator and issued for review by the team; and
- the facilitator or a delegate publishes the final findings and report in the IMS.

9.5 Corrective Actions

Corrective actions should be determined in accordance with the Hierarchy of Controls (see Table 4), which provides guidance on the most effective options and be recorded in the IMS.

Table 4: Hierarchy of Controls

<i>Eliminate the Hazard altogether</i> For example – get rid of the dangerous machine.	Most Effective to Least Effective
<i>Substitute the Hazard with a safer alternative</i> For example – replace the machine with a safer one.	
<i>Isolate the Hazard from anyone who could be harmed</i> For example – keep the machine in a closed room and operate it remotely.	
<i>Use Engineering controls to reduce the risk</i> For example – attach guards to the machine to protect users.	
<i>Use Administrative controls to reduce the risk</i> For example – train workers how to use the machine safely.	
<i>Use Personal Protective Equipment (PPE)</i> For example – wear gloves and goggles when using the machine.	

The Responsible User for an incident must ensure that corrective actions are entered into the IMS.

9.6 Analysis Review

A Reviewer must be assigned in the IMS to review and close an incident report. The Reviewer's responsibility is to review the quality of the investigation including corrective actions, and that the incident report has been accurately completed. Where the Reviewer is of the opinion that the incident report is not to the required

standard, then the incident report must be sent back to the Responsible Person to address.

The Reviewer for significant incidents (level 2 and level 3 incidents) must be the relevant General Manager. The Reviewer for other incidents will typically be someone in a Level 6 role or higher, however this is at the discretion of the department manager.

9.7 Lessons Learned

Key lessons from incidents should be communicated within Pilbara Ports in order that personnel can remain informed of incidents affecting their workplace, and the measures taken to address them. Where relevant and appropriate, lessons may also be shared with vendors.

Communication outside of the port community is at the discretion of the relevant General Manager.

10. TIMELINESS STANDARDS (EXCLUDING PSYCHOSOCIAL INCIDENTS)

10.1 New Incident Report

All incidents must be notified immediately to the relevant Line Manager, Task Supervisor, Contract Coordinator, Contract Owner or Pilbara Ports Representative (Licence), and the initial incident report submitted to the IMS by no later than the end of the shift where practicable.

10.2 Basic Analysis

Basic incident analyses must be completed and submitted to the IMS, and the incident report should be closed within 7 days of the incident being reported to Pilbara Ports. The due date may be extended with approval from a level 7 employee (e.g., a manager) for appropriate reasons. Reasons for extending a due date may include (but not be limited to) the involved persons being unavailable, shift change outs, vessels having departed and waiting on technical reports.

10.3 Detailed Analysis

Detailed incident analyses should be completed and submitted to the IMS. The due date for an analysis to be closed must be agreed between the Responsible User and relevant General Manager. The due date must be recorded in the IMS.

The Health & Safety Manager will report on the progress of Detailed Incident Analyses monthly to the Executive Committee.

11. LEGAL LIABILITY – CONSIDERATIONS

11.1 Admissions of Liability

Pilbara Ports staff must not at any stage provide any guarantee, promise to pay a claim, or make any admissions of liability to any persons whatsoever. Staff should assist police or other authorities. Staff must not sign any statement (other than an internal witness statement) until after they have had it checked by Pilbara Ports' legal team.

11.2 Releasing incident report forms

Incident reports are for internal use only and must not be provided to any third party outside of Pilbara Ports, unless Pilbara Ports is required to release it under law. Members of the public or other organisations may request a copy of an incident report through a Freedom of information (FOI) request.

FOI requests must be addressed and processed by Pilbara Ports' FOI Officer. Contact the FOI Officer for more information regarding accessing documents and FOI requests³.

12. TRAINING

12.1 Incident Analysis Training

Incident analysis training must be completed in accordance with Pilbara Ports' training requirements.

13. REFERENCES

Electricity (Licensing) Regulations 1991

Code of Practice Psychosocial hazards in the workplace

Risk Management Procedure

First Aid Treatment Record

Gas Standards (Gasfitting and Consumer Gas Installations) Regulations 1999

Hazard Management Procedure

Injury Management Procedure

Navigation Act 2012

Occupational Health and Safety (Maritime Industry) Act 1993

Insurance Manual

Record Keeping Plan

Security Incident Reporting Procedure

Significant Incident Notification Template

Transport Safety Investigations Act 2003

Witness Statement Form

³ Freedom of Information application form is available on Pilbara Ports' website.

Workers Compensation Procedure

Work Health and Safety Act 2020

Work Health and Safety (General) Regulations 2022

Workplace Issue and Grievance Resolution Procedure

14. DOCUMENT OWNER

The Health & Safety Manager is responsible for this Procedure.