

# Accident reporting: root cause analysis



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**L**ast month, I discussed the rules in place to prevent retaliation against an employee who reports an injury, and then cited reasons why employees might not want to report an on-the-job injury.

This month, I want to address why you should report those injuries.

In many cases, an injury suffered by an employee may be unique enough that it needs to be investigated thoroughly to determine all the elements that contributed to the injury. When I say all, I mean every single contributory element, so that we can establish every single step that needs to be taken to avoid a similar event.

In other cases, the injury suffered is not so unique, but the investigative process employed by management looks for the simplest and quickest answer so they can shift blame away from themselves in an effort to blame the employee for the event.

In my July 2015 column titled “Are we abating hazards or blaming behavior?” I commented that “...OSHA points out that the least effective ways to prevent an accident are to develop administrative controls (like telling you not to have an accident) or requiring you to use personal protective equipment. Behavior changes do not abate a hazard. They just teach us to work around it...” I also addressed this in my November 2017 column.

**It is easy for your supervisors and managers to point to your behavior and accuse you of not following their instructions about safety. This is not an adequate investigation and fails to discover the cause of an accident.**

Management’s contractual responsibility is identified in Section 821.131 of the *ELM*, which in part states:

...Managers and supervisors of the employee or operation are responsible for quickly and accurately investigating all accidents and occupational injuries and illnesses to determine root causes, and they are responsible for completing the accident report in EHS...

Section 821.31 of the *ELM* indicates that: “...Accident analysis is vital for identifying the hazardous conditions, contributing factors, and root causes of accidents...” There are several additional references to “root cause” in the *ELM*, so what does that really require?

OSHA Publication 3895 is a fact sheet titled “The Importance of Root Cause Analysis During Incident Investigation,” which in part provides:

A successful root cause analysis identifies all root causes—there are often more than one.

Consider the following example: A worker slips on a puddle of oil on the plant floor and falls. A traditional investigation may find the cause to be “oil spilled on the floor” with the remedy limited to cleaning up the spill and instructing the worker to be more careful. A root cause analysis would reveal that the oil on the floor was merely a symptom of a more basic, or fundamental problem in the workplace.

An employer conducting a root cause analysis to determine whether there are systemic reasons for an incident should ask:

- Why was the oil on the floor in the first place?
- Were there changes in conditions, processes, or the environment?
- What is the source of the oil?
- What tasks were underway when the oil was spilled?
- Why did the oil remain on the floor?
- Why was it not cleaned up?
- How long had it been there?
- Was the spill reported?

It is important to consider all possible “what,” “why,” and “how” questions to discover the root cause(s) of an incident.

The fact sheet also provides this underlying idea—regardless of the combination of tools chosen, employers should use these tools to answer four important questions:

- What happened;
- How it happened;
- Why it happened; and
- What needs to be corrected?

**Interviews and review of documents, such as maintenance logs,** can be used to help answer these questions. Involving employees in the root cause investigative process, and sharing the results of those investigations, will also go a long way toward preventing future similar incidents.

If we are reporting all injuries and accidents, and if they are properly investigated, drilling down to the root cause, then, and only then, will we identify all the events in the chain that led to the injury or accident.

If we get to this point, that is when we can truly prevent injuries by jointly developing solutions to the problem revealed in a true root cause analysis.

**If you do report an injury or accident and find that you are retaliated against, exercise your rights to whistleblower protection (see my November 2012 column).**

Keep an eye on each other.