

Anglo American Metallurgical Coal
Corporate Safety Health and Environment Management System

INCIDENT REPORTING

STANDARD

ANGLO AMERICAN METALLURGICAL COAL



Real Mining. Real People. Real Difference.

INTERNAL

Incident Reporting

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1. PURPOSE AND OBJECTIVES

The purpose of this standard is to detail the requirements for the internal reporting and management of Safety and Sustainable Development (S&SD) information at Anglo American's Metallurgical Coal (Met Coal) Business Unit.

The effective management and Learning from Incidents (LFI) minimize loss of value and ensures fewer repeats providing for increased S&SD performance and outcomes.

This procedure defines the requirements for classifying, reporting, investigating and sharing S&SD incidents at Anglo American's Metallurgical Coal (Met Coal) Business Unit.

2. SCOPE

The standard applies to all controlled operations and activities. That is, operations and work-related activities in which Met Coal sets S&SD standards and directly supervises and enforces their application.

It is not intended to take precedence over, or alleviate one from any local jurisdictional requirements, rather this standard outlines a standardised investigation management approach intended to supplement and work in tandem with any local legislative requirements.

3. APPLICATION

Mandatory is indicated by the use of the word "shall" in the Standard.

This standard provides instruction and guidance for standardisation of the incident reporting process. Met Coal Operations are responsible for developing site procedures that incorporate these requirements and any additional requirements to ensure applicability to their operating environment.

In this regard, it must be noted that the requirements of the Met Coal Standard are fundamentally essential and are set as the minimum requirement of all Met Coal Operations. These fundamental requirements cannot be amended other than via a formal review process.

4. PLANNING AND DESIGN

4.1 Incident Notification Processes

All incidents shall be reported immediately to the Supervisor and Statutory Official in charge of an inspection district by the person who becomes aware of the incident.

The Supervisor and Statutory Official shall take whatever steps are necessary to control the incident in order to prevent or minimise any further harm or damage.

The following steps are recommended:

- a) If appropriate, activate the local emergency response plan and/or crisis management plan, summon assistance, and secure the scene without compromising the safety of yourself or others. If unsure of action, immediately seek management assistance or activate your local emergency response plan.
- b) Immediately notify site management of the incident including the type/ nature of incident (e.g. medical, environmental release), area/location of occurrence, personnel involved, assistance required, and your personal contact details (i.e. name, title, contact information).
- c) Start and maintain an incident log, noting all activities related to the incident response, time and date executed, and individuals involved.
- d) Without compromising first response activities, secure the incident scene to prevent the tampering or disturbing of evidence, collect any perishable evidence, and document the names, titles, and contact details of all witnesses and involved parties. The site must preserve evidence to ensure that it can be considered during the investigation. Evidence should not be sent away (e.g. for analysis, repair, etc.) until the independent investigation team has seen it, unless there is a specific request from the authorities to do so.

e) Subsequent to first response actions, legal notifications (if required), and any legally required site inspections; collect, record, label, and store any remaining evidence which may be relevant to the incident.

All Significant Incidents (**Level 4 & 5**) shall be reported according to the requirements in appendix E this document

All **High Potential Incidents & Hazards** (HPI & HPH) shall be reported according to the requirements in appendix F of this document.

Notification of **actual environmental incidents level 1 -3** shall be completed in the timeframes and using the communication channels prescribed below:

ISR Actual	Responsibility	Who Gets Notified	Timing	How
Level 1 or 2	First Responder	Site Environmental Department	0 – 24 Hours	Verbal / Phone
Level 3	First Responder	Site Environmental Department	Immediately	Verbal / Phone
	Site Environmental Department	SHE or Technical Services Manager	Immediately	Verbal / Phone
	SHE or Technical Service Manager	- Site General Manager - BCO Environmental Manager - Head of S&SD	0 – 12 Hours	Verbal / Phone
	Head of S&SD	Group Head of Environment	0 – 24 Hours	Verbal / Phone

Table 1: Notification of Environmental Incidents

External notification of Environmental Incidents:

Each operation will have environmental license conditions issued by the local environmental regulator, which detail the external notification requirements for incidents. Each site is responsible for understanding and meeting the requirements of their environmental license for reporting of environmental incidents. This process is managed by the most senior Environmental person on site. Each site is also responsible for ensuring their local procedures align with this standard.

4.2 Reporting Process

The Enablon incident reporting database shall be used to record the details of incidents and associated actions.

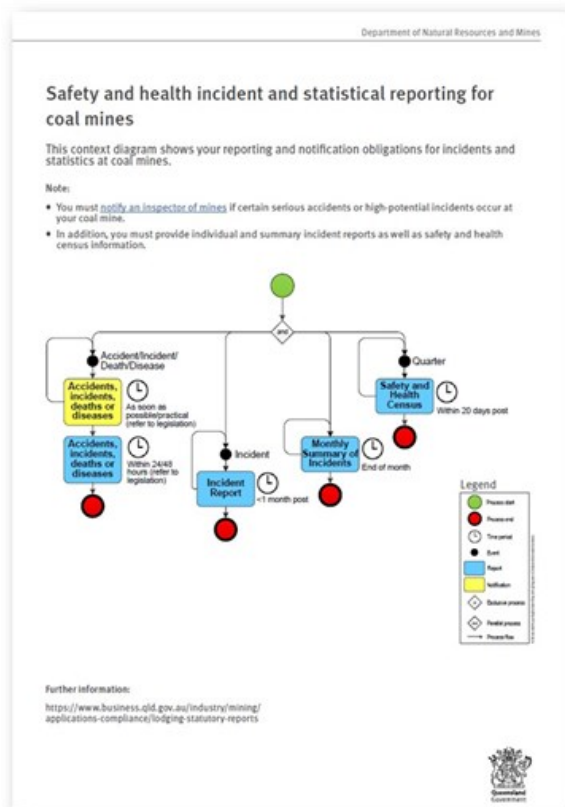
All incidents shall be recorded via entry into Enablon. The initial entry into Enablon shall occur within 48hrs of the incident occurring. **All incidents** shall be investigated and validated within 30 days of the incident occurring.

Before completing any level of sign off the following should be considered:

- Accuracy of the incident classification – refer to Appendix C & H.
- Have the appropriate notifications been completed (Internal and External).
- Quality and appropriateness of the applied investigative techniques.
- Identification of root and / or contributing causes.
- Appropriateness of corrective actions to prevent recurrence.

- Learning's that are relevant to share across the mine site/operation, BU and Group as required.

Note: Local legal reporting obligations are to be complied with in accordance with legislation and its specific definitions and reporting requirements. Example Queensland Department of Natural Resources Mines & Energy (DNRME).



Report/notice and legislation	When to lodge	How to lodge
Notice of accidents, incidents, deaths or diseases (CMSHA' s. 198)	Refer to legislation	Provide initial verbal report to Inspector of Mines, then post or email follow-up written confirmation to the local District or Regional Inspector of Mines . Initial verbal report not required for diseases (written notice only)
Form 5A - Incident report (CMSHR ² s. 16)	Within 1 month after the incident occurs	Use the online form to submit an incident report
Monthly incident summary form (CMSHA s. 279)	At the end of each calendar month for the current month	Use the online form to submit a monthly summary report
Notification of prescribed disease in coal mines (CMSHA s. 198 (6))	When you receive a report of a confirmed diagnosis of a prescribed disease in current or former workers	Notify an inspector of mines and an industry safety and health representative using the 'Notice of confirmation' form (v. 10 or higher) or by email. Refer to reporting prescribed diseases for guidance

Image 2 - Incident, Disease and Statistics Reporting

4.3 Incident Classification

The operation, using the Anglo Risk Matrix Consequence Table as a guide, shall make an initial ranking of the incident.

The operation shall consider whether legal advice is required and the issue of legal professional privilege. Legal advice shall be sought where there has been a fatality or where there is a significant risk of prosecution.

The final classification of incidents shall be determined in accordance with the Anglo-American requirements for reporting and recording defined below.

When determining the **Work Relatedness** of incidents, guidance should be sought from the following documents as required:

- Classification and Recording of Health and Safety Incidents

When determining the Classification of incidents guidance should be sought from the following documents;

- BPP_SSD_BG_000001E SSD Indicators – Safety: Definitions and Guidance Notes.
- BPP_SSD_BG_000003E SSD Indicators – Health: Definitions and Guidance Notes.

- BPP_SSD_BG_000004E SSD Indicators – Environment: Definitions and Guidance Notes.
- AA SSDG Incident Management – Learning from Incidents
- Appendix G – Classification of Occupational Illnesses

When distinguishing between **High Potential Incidents** (HPIs) and **High Potential Hazards** (HPHs) guidance should be sought from Appendix B, Appendix C and Appendix D of this document.

In circumstances where it is unclear what the classification of an incident should be or where there is additional evidence to support an alternative classification a review of the classification shall take place with Met Coal Head of S&SD.

Where an Incident requires re-classification, the site shall complete Form_11-13 Injury Classification Record and attach as much information as needed to support an alternative classification. Information provided may include the following evidence where available; Medical Certificates, Role Descriptions, Return to Work/Management Plans and/or Case Notes.

The Site General Manager will be responsible for approving the initial classification of incidents on site. In cases where this classification is not in accordance with the Anglo-American definitions, interpretation and application of the definition then responsibility for determining the classification shall be with the Head of S&SD in consultation with the relevant Head of Operations.

4.4 Repeat Incidents - Environment

When a repeat incident has occurred, the probability of cumulative impacts or potential impact on the environment is increased. The classification of the repeat incident should take this into account re-assessing the severity of the current impact from a repeat incident. Repeat incidents are to be escalated as per the requirements outlined in Table 7. Once escalated, the incident is to be investigated and communicated as per the requirements of this guideline based on the escalated level.

Incident Level	Number of Repeats	Escalation Level
Level 4 or 5	Maximum 1	NA
Level 3	Maximum 2	Level 4
Level 2	Maximum 5	Level 3
Level 1	Maximum 10	Level 2

Table 3 – Escalation of Repeat Environmental Incidents

4.5 Incident Review Process

Data Review

Incidents may be reviewed by the appropriate Met. Coal S&SD Team member to:

- Determine the appropriateness of classifications based on sites evidence.
- Nature and extent of harm
- Determine the appropriateness of investigations.

Where there are discrepancies in classifications or levels of investigations these shall be tabled for discussion with the relevant operation Safety, Health / Environment Manager.

Significant Incident Review Meeting

Within one month of an HPI occurring, the relevant site/operation General Manager, and involved Line Managers down to Superintendent level will be required to provide a presentation to the Met Coal Leadership Team, to outline:

- How management failures contributed to the HPI
- If there were any failures or possible improvements identified in the Critical Control Monitoring Program
- What lessons have been learnt
- What changes management have instituted to ensure that there are no repeats of this type of HPI.
- What action site management have taken to ensure that other operations, particularly those using similar practices, have been fully appraised of the lessons learnt from the HPI.

Each session will be led by a member of Met Coal Leadership Team (MCLT), and will routinely involve:

- The relevant Head of Operations
- The Head of S&SD Met Coal
- The Chief Executive Officer
- An Executive Leadership Team member from another discipline.

4.6 Learning from Incidents (LFI) Investigations

Met Coal's ability to continually improve performance and prevent incidents and injuries from occurring at our operations is supported by the Learning from Incidents (LFI) process.

The LFI process ensures that SHE incidents are reported, recorded, analysed, investigated and causes are identified, risk profiles are updated, learnings are shared, and corrective and improvement actions are implemented across our business.

An investigation and report shall be completed following all reported events/incidents that occur at Met Coal operations.

The relevant Head of Operations and an additional EXCO member will have the final signoff of all HPIs after the investigation has been completed.

The Anglo American LFI Management Process is presented in the figure below:



Table 4 – Learning from Incidents (LFI) 5 Step Process

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The minimum level of investigation tools and data captured in Enablon shall be applied as followed:

CAPTURE PAGE	LEVEL 1		LEVEL 2		LEVEL 3		LEVEL 4		LEVEL 5		HAZARD	
	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential	Actual	Potential	Level 1-3	HPH
Event (Incident)	X	X	X	X	X	X	X	X	X	X	X	X
Consequence	X		X	X	X	X	X	X	X	X		X
Investigation							X	X	X	X		
Evidence							X	X	X	X		
Statement							X	X	X	X		
ANALYSIS TOOL	X (1 Analysis Tool)	X (1 Analysis Tool)	X (1 Analysis Tool)	X (1 Analysis Tool)	X (3 Analysis Tools)	X (3 Analysis Tools)	X (4 Analysis Tools)	X (4 Analysis Tools)	X (All Analysis Tools)	X (All Analysis Tools)		X
Sequence of Events	X		X	X	X	X	X	X	X	X		X
Control Analysis							X	X	X	X		X
Behaviour Analysis					Choose any 2	Choose any 2			X	X		Choose any 2
Change Analysis							Choose any 2	Choose any 2	X	X		
Why Analysis									X	X		
Summary							X	X	X	X		
Action Plan					X	X	X	X	X	X		X
Task					X	X	X	X	X	X		X

Table 5 – Minimum Level of Investigation Required in Enablon

Currently Approved Incident Classification	Proposed Revision of Incident Classification	Level Investigation	Metcoal LFI Team Members
Insignificant Level 1 Example First Aid case	Insignificant Level 1 and Level 2 Example: First Aid Case & Medical Treatment Case	Operation	Investigation Lead – Supervisor Team (to include): • CMW • ERZC / OCE of inspection district
Minor and Moderate Level 2 & 3 Example: MTC /LTI	Minor and Moderate Level 3 Example: LTI	Operation	Investigation Lead – Superintendent (Responsible Dept). Team (to include): • CMW • ERZC / OCE of inspection district • Supervisor (could also be ERZC/OCE) LFI Trained facilitator within team or access to support As required – SHE Professional, Technical Expert & Legal Support
High and Major Level 4 & 5 Example: Single/Multiple Fatality	High and Major Level 4 & 5 Example: Single/Multiple Fatality	Operation BU Group Oversight for Actual level 4 & 5 and Potential level 5	Non-Fatality, HPH & HPI (including DNRME HPIs) Investigation Lead – SLT Manager or EEM or MEM Team will be assigned and approved by the SSE in consultation with the Head of Operations & the Head of S & SD (maybe responsible SLT members or independent). Team (to include): • CMW • ERZC / OCE of inspection district LFI Trained facilitator within team or access to support. As required – SHE Professional, Technical Expert & Legal Support. Fatality Investigations – Initial BU & External BU BU investigation lead – Head of Operations. <i>Team members will be assigned and approved by Head of Operations in consultation with CEO & Head of S & SD.</i>
<p>Investigation Lead is the senior person on the investigation and is the owner and the report author. This demonstrates visible felt leadership and ownership. LFI Facilitator is to support and provide guidance to the team to follow process and support the investigation lead. ERZ Controller & Open Cut Examiner investigation involvement as per CMSHR, Part 3.s15(2)(a)&(b)</p>			

Table 6 – Recommended Participants for LFI Investigations

4.7 Incident Alerts – Sharing the Learnings

There are two types of incident alerts that are used across the Met Coal business.

- **Stage 1 Alerts** are generated and distributed for all recordable incidents. The information included in the Stage 1 Alert includes a brief description of the incident, initial classification and immediate corrective actions. The Stage 1 alert is issued directly from Enablon.
- **Stage 2 Alerts** are issued out for all High Potential Incidents (HPIs) and High Potential Hazards (HPHs) as a way of distributing key learning's from the investigation across all Anglo-American business units. The Stage 2 Alert will be developed after the LFI Investigation has been completed and entered Enablon. This alert is generated directly from Enablon once the investigation has been completed, reviewed and approved.

Anglo American also share learnings globally among their Business Units. The process is initiated out of South Africa by Group LFI Co-Ordinator who distributes incident information directly from the Enablon database. These learnings are distributed via email on a bi-weekly basis.

In addition to the Stage 1 and Stage 2 Alerts, each operation shall develop a communication system to distribute learnings from investigations conducted on their operation. The operation investigation communication should include a description of the incident, causes, contributing factors and any actions to prevent recurrence.

Met Coal operations shall establish and implement processes to receive external alerts and communications. Operations shall review these alerts to determine their relevance. For relevant alerts, the operation shall identify and implement actions to address the key learning's and applicable recommendations to that operation. Where an alert is deemed not relevant this shall be recorded.

5. ROLES & RESPONSIBILITIES

The most senior management level at each Met Coal Managed Operation or Project is responsible for the application and execution of the Incident Reporting and Investigation Standard.

	Function	Responsibilities
Business Unit	Business Unit CEOs	<ul style="list-style-type: none"> • Ensure incidents are investigated in a comprehensive manner and recommended actions are implemented timeously. • Ensure incident learnings are effectively communicated across the business unit portfolio and integrated into respective operations/activities. • Ensure controls are identified and effectively implemented to prevent and mitigate incidents with major and high consequence potential. • Report all level 4 and 5 incidents to the Group CEO in a timeous manner (as per the LFI notification process in Appendix E).
	Business Unit Heads of SSD or equivalent	<ul style="list-style-type: none"> • Ensure incidents are investigated in a comprehensive and objective manner and that recommended actions are implemented in a timeous manner. • Ensure incident notifications are appropriately escalated in a timeous manner (as per the LFI notification process in Appendix E). • Assist with incident investigations as needed. • Analyse and identify incident trends, including investigative observations, findings, and outcomes (at a BU level), report observations to management, and define tactical actions to prevent incidents and mitigate consequences.

Site/ Operation	Site/ Operation Leadership	<ul style="list-style-type: none"> • Site incident management procedures are developed and implemented in a manner consistent with applicable local legislation, internationally recognized standards, the SHE Way and the applicable Business Unit LFI incident management Standard. • All individuals potentially involved in incident management are properly trained, competent, and resourced to effectively carry out their respective roles. • All incidents are reported, properly categorized, recorded, escalated and investigated in accordance with the requirements defined in the SHE Way and the LFI process. • Incident investigations are led by an appropriate management representative and facilitated by a competent individual. • Learnings from internal incidents are effectively communicated to appropriate site/ operations managers and employees, including contractors, and corrective / preventative actions stemming from these are implemented. Key learnings from relevant external incidents are communicated by Group S&SD and any relevant corrective/ preventative actions required to address must be taken by the sites. • Risk assessments and control registers are routinely updated to incorporate learnings from internal and external incidents. • An effective action management process is established and maintained to monitor and address outstanding actions. • Investigative programs and processes are routinely reviewed to ensure they are effective, comprehensive, and objective.
	SHE Manager	<ul style="list-style-type: none"> • Oversee day-to-day implementation of the Site incident management procedure, including escalating incident notifications as required and ensuring trained and competent facilitators are available to support incident investigations. • Ensure an incident management system and associated database is established and accurately maintained. • Identify and analyse incident trends, including investigative finding, observations, and outcomes (at a site level), and share learnings with site management and line managers. • Establish Key Performance Indicators (KPIs) to understand LFI process effectiveness at sites and routinely measure and report performance to site/ operations management in an effort to drive continuous improvement. Any Group specified KPIs around LFI should be integrated into monitoring plans and actively reported and reviewed to address any shortcomings. • Verify incident action items are taken in a timeous manner and are effective.
	Employees and Contractors	<ul style="list-style-type: none"> • Report all incidents to management immediately. • Cooperate, contribute, and participate in incident investigations as needed/required.

Table 6 – Roles and Responsibilities for the Application and Execution of Incident and Investigation

6. COMPETENCIES AND / OR AUTHORISATIONS

At all Met Coal sites, all employees and contractors must be made aware of the requirements around LFI especially their role in terms of reporting, participating in incident investigations where appropriate and actively applying the learnings from incidents.

To ensure the LFI process is applied consistently and systematically across the organisation, training has been developed for incident investigation teams and especially incident investigation facilitators to ensure they have the right skills and understanding to complete the LFI process.

7. DEFINITIONS

Causation	: Factors that act together to cause an incident. They include personal factors (i.e., capability, knowledge, behaviour), workplace factors (i.e., equipment / workplace conditions, design, availability), and organizational factors (i.e., culture, leadership, planning).
Complaint	: A complaint is a concern from an affected stakeholder that has been lodged through a formal mechanism, and which relates to concerns regarding actual or perceived impacts or consequences stemming from our direct or indirect operations.
Contributing Factors	: Event or condition that together with other causes increased the likelihood of an incident but which individually did not cause the incident.
Direct Cause	: An action, event, flaw or force that is the immediate, initiating or primary agent which leads to, or allows an incident to happen.
Harm	: Physical or biological damage, loss or impairment, negative impacts on individuals or communities or some other change to a worse state.
Hazard	: Source or situation with the potential for harm.
Impact (Environment)	: Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.
Impact (Reputational)	: Public concern or adverse publicity caused by organisational behaviour or events.
High Potential Hazard (HPH)	: Is a condition or situation which could materialize into an unwanted event with a consequence rating of 4 (High) or higher as referenced on the Group Risk Rating Matrix. (see Appendix D)
High Potential Incident (HPI)	: Referring to the Anglo-American Group Risk Rating Matrix in Appendix D, an HPI is an incident with an actual consequence rating of "3 – Moderate" or lower but possessing a reasonable worst case potential consequence rating of "4 – High" or higher. (see Appendix B)
Incident	: An Unwanted Event which instantaneously or over the course of time harms or otherwise negatively impact people, the environment, company assets (i.e., plant, property, or equipment) and / or the company's reputation. It is an unwanted event which leads or may lead to the actualisation of risk.
Lost Time Injury	: A lost-time injury (LTI) is a work-related injury resulting in the employee/contractor being unable to attend work or being unable to perform the routine functions of his/her job, on the next calendar day following the day of the injury, whether a scheduled work day or not.
Learning from Incidents (LFI)	: A defined Anglo-American process to drive continuous Safety, Health, Environmental and Social performance improvement through structured incident investigation, analysis, and communication
Managed Operations	: An operation (for example site, project or plant) where Anglo American Metallurgical Coal has operational control.
Repeat Incident	: A repeat incident is an incident that stemmed from the same hazard as a prior incident, occurred due to the same or similar control failures and resulted in a similar consequence

or had the potential to result in similar consequences as an incident which has previously occurred and within Anglo American operations.

Significant Incident : An incident with an actual consequence / ISR rating of level 4 or level 5 on the Anglo Incident Severity Consequence Matrix Table. (see Appendix B)

Shall : In this standard the word shall indicates a statement is mandatory

Should : In this standard the word should indicates the statement is a recommendation

Unwanted Event : A description of a situation where the hazard has or could possibly be released in an unplanned way, including a description of the consequences.

8. REVIEW CRITERIA

This document shall be reviewed as follows:

- At least every five years;
- When there is a change of method and/or technology and/or legal or other requirement that may affect the accuracy of this document;
- When operational changes occur that effect the currency of documents;
- When there has been a significant event to which this document was relevant; and
- As a result of relevant audit findings.

9. DOCUMENT CONTROL

Document Name: Met Coal_STD_Incident Reporting
 Document Owner: Head of S & SD – Anglo American Metallurgical Coal
 Approval: Head of S & SD – Anglo American Metallurgical Coal

VERSION N ^o .	ISSUE DATE	REVIEWED TEAM MEMBERS	REVIEWED RELEVANT MANAGER	APPROVED	SIGNATURE
10	08 th April 2019	Ian Hogg			Signature
		Liz Sanderson			Signature
		Jessie Penton			Signature
			Chris Gately		Signature
			Jason Fittler		Signature
				Andrea Rutley	Signature

APPENDIX A: CLASSIFICATION OF INCIDENTS MATRICES, ADDITIONAL GUIDANCE FOR ENVIRONMENTAL AND OCCUPATIONAL HEALTH INCIDENT CLASSIFICATION IS AVAILABLE BELOW

In order to classify environmental incidents please refer to the Environmental Classification Workbook on <https://eureka.angloamerican.com/docs/DOC-62188>. A copy of this can also be requested from the Anglo-American Head of Environment. The workbook provides guidance for classifying environmental incidents considering three dimensions, namely scale, sensitivity and remediation/ clean up as per the table below.

					SIGNIFICANT INCIDENT	
		Level 1	Level 2	Level 3	Level 4	Level 5
Environment	Scale <i>How significant is the size/scale of the impact relative to the size/scale of the receiving environment?</i>	The size/scale of the impact is insignificant relative to the receiving environment	The size/scale of the impact is minor relative to the receiving environment	The size/scale of the impact is moderate relative to the receiving environment	The size/scale of the impact is high relative to the receiving environment	The size/scale of the impact is major relative to the receiving environment
	Sensitivity <i>How sensitive is the receiving environment to the impact? How special or unique is the area that has been impacted?</i>	Receiving environment has insignificant sensitivity to the impact	Receiving environment has minor sensitivity to the impact	Receiving environment has moderate sensitivity to the impact	Receiving environment has high sensitivity to the impact	Receiving environment has major sensitivity to the impact
	Remediation & Clean Up <i>How difficult is the impact to contain, remediate and/or clean up? How much time and/or resources are required?</i>	Containment, remediation and/or clean up of the impact is insignificant (quick and easy)	Containment, remediation and/or clean up of the impact requires minor intervention and time	Containment, remediation and/or clean up of the impact requires moderate intervention and time	Containment, remediation and/or clean up of the impact requires high intervention and time	Containment, remediation and/or clean up of the impact requires major intervention and impacts may be irreversible

Health incident classifications are defined in the Enablon guidance document *S&SD INDICATORS – HEALTH: DEFINITIONS AND GUIDANCE NOTES 2019 BPP_SSD_BG_000003* in table *INCO100000 MEDICAL INCIDENTS* describing the health outcomes and corresponding levels of severity.

INC010000**MEDICAL INCIDENTS****INC010020***Number of level 2 (minor) health incidents reported (number)*

- Health symptoms requiring medical intervention and full recovery (no lost time).
- Health impact, medical surveillance test changes/abnormal test results
- Changes in biological markers (sub-clinical)

INC010030*Number of level 3 (moderate) health incidents reported (number)*

- Diagnosed single case (reversible or limited impairment) of:
 - occupational dermatitis
 - malaria
 - Pt. & Rh salt sensitivity (occ. asthma)
 - hand-arm vibration syndrome
 - musculoskeletal disorder
 - other occupational disease
- Single case of Noise induced hearing loss (NIHL) – OHS/ICMM definition (corrected for age)

INC010040*Number of level 4 (high) health incidents reported (number)*

- Diagnosed single case of:
 - silicosis
 - coal-workers pneumoconiosis
 - obstructive airways disease
 - occupational cancer
 - venous thromboembolism (VTE)
 - occupational (cardio-pulmonary) TB
- or, a similar case of a premature life-ending illness or medical incapacity
- Multiple cases of NIHL in a single cohort (HEG/SEG) over a 12-month period

INC010060*Number of level 5 (major) health incidents reported (number)*

- Multiple cases of premature life-ending illnesses or medical incapacity
- Multiple diagnosed and confirmed cases of silicosis, CWP or occupational cancers within a single cohort (HEG/SEG) over a 12-month calendar period

INC010090*Number of Level 3,4 & 5 health incidents investigated (number)*

The number of Level 3,4 & 5 health incidents that have been formally investigated during the month.

APPENDIX B: INCIDENTS THAT WOULD NORMALLY QUALIFY AS HPI'S

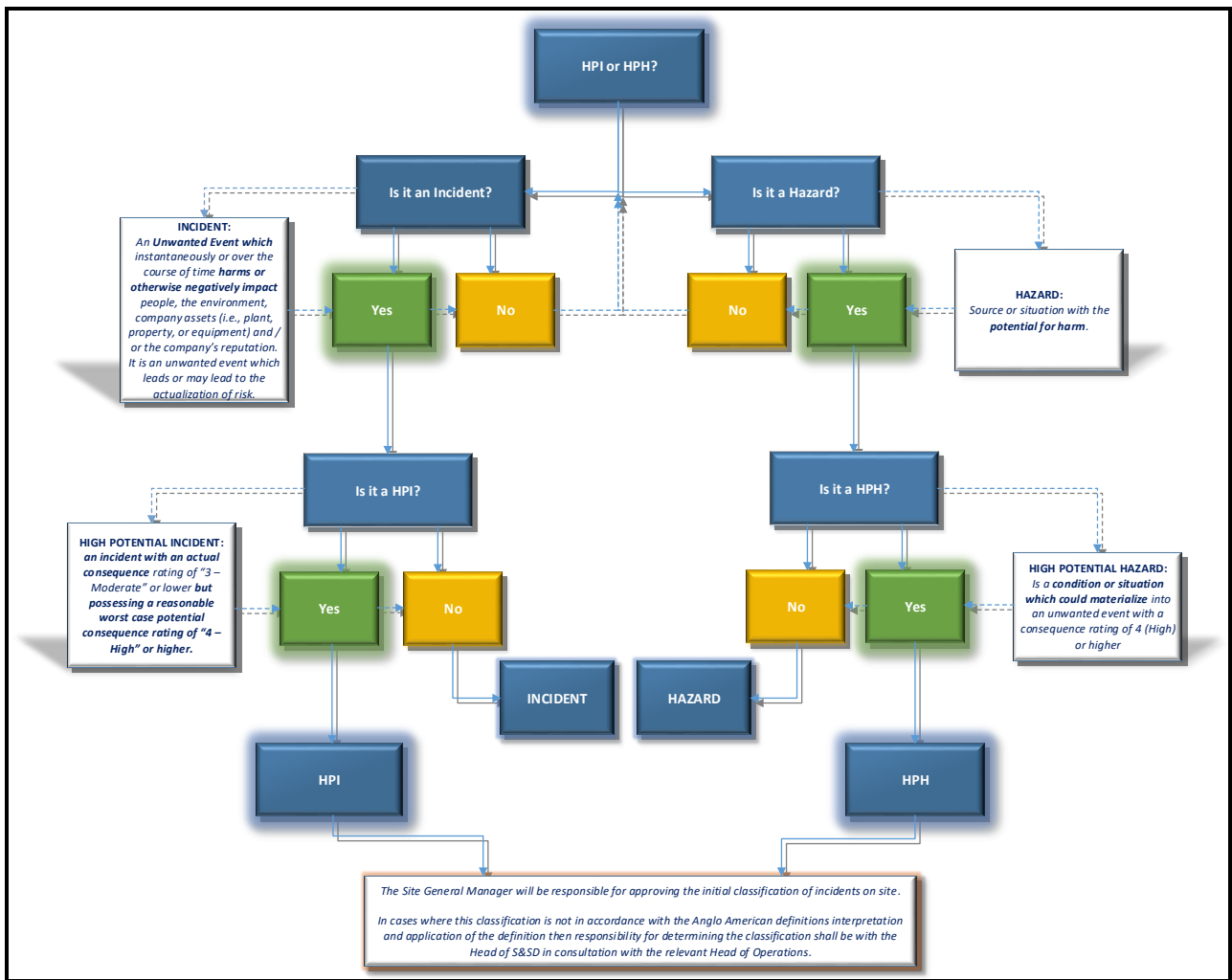
The following incidents may qualify as Safety HPIs:

- Any vehicle rollover.
- Any unplanned contact between HVs, LVs, and Pedestrians.
- Any electric shock greater than “extra low voltage” (as defined in AS:3000 – not exceeding 50V ac or 120V ripple free dc).
- Any unplanned movement of vehicles.
- *Any fall of strata in a functioning travel road that was previously considered to be supported to the Mine Managers Support Rules.*
- Any gas ignition underground.
- *A failure of a primary ventilation circuit that requires the emergency withdrawal of Mine Workers from a part of the mine.*
- Any inrush of water *into an underground or open pit mine.*
- Any highwall failure *where there were no controls in place to prevent personnel being impacted.*
- Any low wall failure *where there were no controls in place to prevent personnel being impacted.*
- Any potential for personnel to be affected by an uncontrolled blast during storage, transportation and handling of explosives.
- Any situation where personnel are inadvertently exposed to blasting.
- A structural failure of plant or equipment that could impact on personnel
- Unauthorised mass land clearance with irreversible impact on endangered species or ecosystem.

The following incidents may qualify as Health HPIs

- Workplace inhalable hazard concentration \geq 8hr OEL
- Uncontrolled release of an inhalable hazard from a source into the workplace atmosphere
- Contaminated drinking water
- Contaminated food

APPENDIX C: HPI VS HPH DECISION TREE



APPENDIX D: EXAMPLES OF POSSIBLE HIGH POTENTIAL HAZARDS

When the integrity of a Critical Control has failed this should be recorded as an HPH.

Conditions

- Large piece of coal caught up under the tray of rear dump truck parked at the go line.
- Location of an intact detonator and approx. 20cm explosives in an area that was previously blasted.
- Power still sufficient to start an engine despite the main isolator switch being in the off position and locked out
- Cracks noticed on underground diesel storage tanks. No diesel spilt into groundwater but potential for full capacity of storage to contaminate aquifer.

Behaviours

- Personnel working at heights without fall protection controls.
- Personnel working on equipment that hasn't been isolated and there was no attempt to start the equipment.
- Personnel parking vehicles in close proximity to the base of a highwall.
- Personnel entering a loaded blast pattern

Health

- A local exhaust ventilation system (LEV) incorrectly positioned or not performing up to the design parameter (i.e. not delivering the designed air flow or volume).
- Dust mist suppression system turned off - Rupture of a noise silencer
- Rock drill without a silencer in the workplace
- DPM filter removed from exhaust
- Excessive overtime / shift duration Employee not wearing hearing protection in a demarcated noise zone
- Employee not wearing respiratory protection in a demarcated respiratory zone.
- Incorrect respiratory protection used

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APPENDIX E: SIGNIFICANT INCIDENT (ACTUAL ISR 4 & 5) NOTIFICATIONS

Step #	Step	Responsibility	Who Gets Notified	Timing	How
1a	Immediate Site Notification – Verbal	Affected site line management	<ul style="list-style-type: none"> - Affected Site General Manager or most Senior Site Manager 	Immediate	Verbal
1b	Immediate Notification – Verbal	Affected General Manager / Most Senior Site Manager	<ul style="list-style-type: none"> - BU Head of Operations or Alternate - BU Head of S&SD - BU Legal 	Immediate	Phone
2a	Immediate Notification – Verbal	BU Head of Operations / (Emergency / Crisis Coordinator)	Senior BU Leaders: <ul style="list-style-type: none"> - BU CEO - BU Head of External Affairs - BU Head of S&SD - BU Head of HR - BU CFO - BU Legal Team - Other BU Senior Leaders 	0 – 2 Hours	Phone to BU distribution list
2b	Immediate Notification – Verbal followed by email (1)	BU Head of S&SD	<ul style="list-style-type: none"> - Group Head of S&SD - Group Discipline Head E.g. Environment, Health S&SD Engagement Manager 	0 – 2 Hours	Phone / SMS / email Notification template to be used in mail.
3	Immediate Notification - Verbal	BU CEO	Group Senior Leaders <ul style="list-style-type: none"> - AA plc CEO - AA plc Chairman - Group Head of S&SD 	0 – 4 Hours	Phone / SMS

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APPENDIX F: HIGH POTENTIAL INCIDENT AND HIGH POTENTIAL HAZARD NOTIFICATIONS

Step #	Step	Responsibility	Who Gets Notified	Timing	How
1	Notification of HPI Occurring	Affected General Manager / Most Senior Site Manager	<ul style="list-style-type: none"> • Head of S&SD • Relevant Head of Operations, Project or Technical 	Within 12 hours	Phone (verbal or text) with follow up email
2	Initial Entry into Enablon triggering an Alert Level 1	Affected General Manager / Most Senior Site Manager	All Operations	Within 48 hours	Enablon
3	15min phone hook up to discuss initial findings	Affected General Manager / Most Senior Site Manager	<ul style="list-style-type: none"> • Head of S&SD • Relevant Head of Operations, Project or Technical, Safety or Environment 	Within 7 days	Verbal / Phone
4	Proposed actions for review and sign off	Affected General Manager / Most Senior Site Manager	Relevant Head of Operations, Project or Technical, Safety or Environment	Within 14 days	Email
5	Final Incident Investigation Report and Level 2 Alert	Affected General Manager / Most Senior Site Manager	<ul style="list-style-type: none"> • Head of S&SD • Relevant Head of Operations, Project or Technical, Safety or Environment 	Within 30 days	Email

APPENDIX G: DEFINITION OF OCCUPATIONAL ILLNESSES VS WORK RELATED INJURIES

Occupational Illness is a work-related condition or disorder caused predominantly by exposures at work, other than one resulting from a Work Injury.

The primary difference between a Work Injury and an Occupational Illness is whether it resulted from a single event (a Work Injury) or from prolonged or multiple exposures to hazardous substances or work conditions.

Further explanation regarding the distinction between occupational illnesses and work-related injuries is provided below.

- Hearing loss due to exposure to excessive noise over a period – occupational illness;
- Hearing loss due to a single exposure to an extremely loud noise – work injury;
- Dermatitis type reaction as a result of exposure to certain chemicals over a period – occupational illness;
- Chemical burn type condition resulting from a single exposure to a chemical – work injury;
- Back or neck condition due to operating dozers over rough ground for a period of time – occupational illness;
- Back or neck injury due to a dozer running over a large rock and crashing to the ground – work injury.

Note the following two qualifying statements that may assist in determining whether a condition is to be classified as an Anglo-American occupational illness.

- a) Where an injury or illness has previously been reported (and on that previous occasion has been classified as an occupational illness or work injury) and no new exposure at work has occurred, then any recurrence of the pre-existing condition is not a new occupational illness. It is to be recorded as a continuation or re-opening of the previous injury or occupational illness;
- b) The development of a medical condition (particularly a musculo-skeletal type condition) in a person during the course of his or her employment does not automatically constitute an occupational illness. There must be some reasonably clear and significant relationship between the condition and the person's work environment or specific activities at work, for the condition to constitute an occupational illness

The table in Appendix A *INC0100000 MEDICAL INCIDENTS* describes the health outcomes and corresponding levels of severity that relate to occupational illness cases.

Further occupational illness definitions are described in Appendix H

APPENDIX H: INJURY CLASSIFICATION GUIDE USING OSHA RECORDKEEPING HANDBOOK

This sheet provides an abbreviated guide to classifications that are to be used for injury and illness events at Anglo American's Metallurgical Coal Business (Met Coal). The classification allocated to an injury or illness event at Met Coal should be in accordance with the **OSHA Recordkeeping Handbook 3245** in the first instance. This sheet also provides guidance on the areas where Met Coal has additional requirements over and above the OSHA requirements. The OSHA documents can be accessed in full from this link:

http://www.public.navy.mil/NAVSAFECEN/Documents/OSH/SafetyOfficer/OSHA_3245_REVISED.pdf The current Met Coal document that details the requirements for internal reporting and management that must be complied with is the **Incident Reporting Standard 11-4** and this is available from the following link:

<http://auanglodoc.anglo.local/sites/metcoal/shms/CAC/Safety%20Documents/Forms/STD%2011.aspx>

If the examples in this brief reference do not cover the circumstances of an event to be classified, further guidance should be sought by reference to the OSHA Handbook. The page numbers referenced in OSHA 3245 are noted below as [OSHA pp00-00] and the reference pages to the Met Coal Standard are noted as [Std11-4 pp0-0].

1. **WORK RELATED v NON-WORK RELATED** [OSHA pp13- 24] - A case is **work-related** if an event or exposure in the work environment caused or contributed to the resulting condition or significantly aggravated a pre-existing condition. It is **non-work related** if symptoms occur at work from a non-work-related condition, if the outcome is solely from participating in a wellness program, eating, drinking or preparing food, from grooming, is self-inflicted, occurs in the company car park or while commuting.
2. **FIRST AID CASE** [OSHA pp 50-51] – First Aid is defined by OSHA 3245 as simple treatments, generally one-time or short-term, usually simple with little technology and administered **to keep the injury or condition from becoming worse**. A case is **First Aid** if any of the following treatments are provided **regardless of who provides this treatment** (e.g. a health or medical professional or a first aider) – the item numbers below are those used in OSHA 3245:
 - A. Using a non-prescription medication at non-prescription strength
 - B. Administering tetanus immunizations (other immunizations, such as Hepatitis B, vaccine is medical treatment)
 - C. Cleaning, flushing or soaking wounds on the surface of the skin
 - D. Using wound coverings such as bandages, Band-Aids, gauze pads, etc. or using butterfly bandages or Steri-Strips (**other wound closing devices such as sutures, staples, AND glue., are considered medical treatment**)
 - E. Using hot or cold therapy
 - F. Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts
 - G. Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars)
 - H. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister
 - I. Using eye patches
 - J. Removing foreign bodies from the eye using only irrigation or a cotton swab
 - K. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs
 - L. Using finger guards
 - M. Using massages (physical therapy or chiropractic treatment are considered medical treatment)
 - N. Drinking fluids for relief of heat stress.

This is the complete First Aid treatment list – all other treatments are Medical Treatment unless the treatment required is for observation only or for diagnostic purposes only e.g. taking vital signs or radiology. Note that “drinking fluids for heat stress” is a FA case and heat stress as an actual consequence is considered an injury rather than an illness.

3. **MEDICAL TREATMENT CASE** [OSHA pp 56-61]- **Medical treatment** is defined by OSHA 3245 as the management and care of a patient for the **purpose of combating disease or disorder**. Any treatment provided by any health care professional within their individual scope of practice **that is not listed** in OSHA 3245 as *First Aid Treatments A to N* (as above) is considered **Medical Treatment**. This includes, but is not limited to:
 - a) prescription medication (other than for diagnostic purposes) and non-prescription medication at prescription strength e.g. Ibuprofen at 400mg per dose {OSHA pp56 & 58}
 - b) physiotherapy unless the physiotherapist is performing an OSHA defined First Aid treatment {OSHA p60}
 - c) suturing, stapling, gluing or debriding a wound {OSHA pp59 & 60}
 - d) removal of foreign body in the eye if this takes more than simple flushing or removal with a cotton tip [OSHA p60]

The exceptions to classification of Medical Treatment include visits to a physician, nurse or other health professional or service solely for diagnostic purposes such as radiology or pathology, for observation or review, or for counselling.

4. RESTRICTED WORK CASE [OSHA pp 48-51] **Restricted Work** as described in OSHA 3245 is when a worker is kept from performing one or more of their **routine functions** or working their full hours **based on advice of the employer or any licensed health care professional** on any day following the day a work-related injury or illness occurs. Routine functions are defined as those work activities the worker regularly performs at least once per week. Examples of **Restricted Work** include:

- a) Restrictions to weights in manual tasks e.g. *no lifting above 10kgs*- if the worker is not required to perform lifting tasks of 10kgs or more as a routine function of the tasks they
- b) perform and this is the only restriction this would not be considered Restricted Work
- c) Restrictions that include *no driving* would also include operation of light vehicles, and open cut or underground mobile equipment.
- d) Changing shift length, shift type or rotation e.g. *no night shift*, or *max 8 hours*, or changing rostered days to *week days only* is Restricted Work.
- e) If **light duties** are advised, then it is essential that this is discussed with the health professional and redefined in terms of routine job functions i.e. what tasks cannot be performed.
- f) If **office duties** or **inspection tasks only** or **workshop duties only** or **review procedures** are advised, then unless this is the **full** routine role of the worker this is **Restricted Work**.
- g) If it is advised that an individual piece of equipment cannot be used e.g. *no dozer operating*, then it must be determined if that piece of equipment is routinely operated by that worker at least once a week. If this is the case, then this is **Restricted Work**.
- h) If a body activity is restricted e.g. *no use of right hand* or *no squatting* it must be determined if the worker can carry out all their routine functions. An example would be for a workshop fitter who is advised **no use of left arm** it must be determined how likely is it that the fitter could do all routine tasks with one arm.

5. **LOST TIME INJURY** [OSHA pp 47-51; Std 11-4 p3] A **Lost Time Injury** (LTI) is a work-related injury resulting in the worker/contractor being unable to attend work, or being unable to perform the routine functions of his/her job, following the day of the injury, whether a scheduled work day or not. This means any injury or illness that is classified a **Restricted Work Case** in accordance with the notes above is a Lost Time Injury. It should also be clear that it does not need to be the day immediately following the injury or illness when time is lost, or restrictions apply provided the time lost or restrictions are clearly linked to the work-related event.

6. **OCCUPATIONAL ILLNESS** [Std 11-4 p3] An **Occupational Illness** is a work-related condition or disorder caused predominantly by exposures at work, other than one resulting from a Work Injury. The primary difference between a **Work Injury** and **Occupational Illness** is whether it resulted from a single event (Work Injury) or from prolonged or multiple exposures to hazardous substances or work conditions. Further distinction is provided below:

- a) Dermatitis due to exposure to chemicals over a period is an occupational illness **vs** a chemical burn from a single exposure is a work injury;
- b) Back condition from operating dozers over rough ground for several days is an occupational illness **vs** back injury due to a single jolt of a dozer hitting a large rock is a work injury.

The following points are also noted [Std 11-4 p20] that may assist in determining Occupational Illness vs Work Injury:

- Where an injury or illness has previously been reported and classified as an occupational illness or work injury and no new event at work has occurred, then any recurrence of the pre-existing condition is not a new occupational illness. It is to be recorded as a continuation or re-opening of the previous injury or occupational illness;
- The development of a medical condition, particularly a musculoskeletal condition, during the course of employment does not automatically constitute an occupational illness. There must be clear and significant relationship between the condition and the worker's work environment or activities at work, for the condition to be an occupational illness.

7. **PRE-EXISTING CONDITIONS** [OSHA p 20] **Pre-existing conditions** are those that result solely from a non-work-related event or exposure, or while working for another employer and are considered **non-work-related**. However pre-existing conditions that have been **aggravated**, or made worse by events or exposures at work which result in a change to the extent of workplace management, medical treatment or days lost are considered **work-related**. An example would include:

- a) A pre-existing knee condition that has not required workplace management, medical intervention or time off in the past until an event or exposure at work creates an increase in symptoms and requires increased intervention would be considered **work-related**.

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8. **TOTAL RECORDABLE CASES** Total recordable cases are a count of the combination of fatalities, lost time injuries and medical treatment cases.

APPENDIX I: SEQUENCE OF EVENTS – TEMPLATE

Date	Time	Event or Condition

APPENDIX J: CONTROL ANALYSIS – TEMPLATE

Unwanted Event:				
Hazard:				
Absent of Failed control and support systems	How did they perform?	Why did they fail or were absent?	Outcome of failed or absent controls and support systems.	Site critical control Yes or No?

APPENDIX K: HUMAN BEHAVIOUR ANALYSIS - TEMPLATE

Human Behaviour Analysis		
A – Activator	B – Behaviour	C – Consequence

APPENDIX L: CHANGE ANALYSIS – TEMPLATE

Normal Practice	Situation or practice at the time of the incident	Gap (difference)	Impact of Difference

APPENDIX M: WHY TREE ANALYSIS – TEMPLATE

The Event

Shoulder 1

Shoulder 2

- Why
- Why
- Why
- why
- Why

- Why
- Why
- Why
- Why
- Why
- Why
- Why

APPENDIX N: REFERENCED DOCUMENTS

REFERENCE DOCUMENTS

MetCoal 11-13 FRM	:	Injury Classification Record
MetCoal 11-9 TEM	:	Incident Investigation Report Template
MetCoal 7-21 FORM	:	Enablon Initial Event Form
MetCoal 11-2 STD	:	Corrective and Preventive Actions
MetCoal 11-11 STD	:	Environmental Incident Investigation and Reporting
MetCoal 11-24 TEM	:	LFI - High Potential Incident Feedback Report Template
MetCoal 11-25 GUIDE	:	LFI_ Field Guide

These documents are managed by Anglo American Group S & SD. The latest versions can be found in the Enablon Database Library.

AA_BPP SSD BG 00002E	:	SSD Indicators, Definitions and Governance
BPP_SSD_BG_000001	:	SSD Indicators – Safety: Definitions and Guidance Notes
BPP_SSD_BG_000003	:	SSD Indicators – Health: Definitions and Guidance Notes
BPP_SSD_BG_000004	:	SSD Indicators – Environment: Definitions and Guidance Notes
BPP_SSD_BG_000005	:	SSD Indicators – Leading Indicators Definitions & Guidance Notes
AA SSDG Incident Management	:	S&SD Group Guideline Incident Management - Learning from Incidents
Enablon Appendix A	:	Appendix A – Specification for Recording of AA Safety & Health Incidents

EXTERNAL DOCUMENTS

CMSH Act QLD.	:	QLD Coal Mining Safety and Health Act 1999
CMSH Regulations QLD.	:	QLD Coal Mining Safety and Health Regulation 2017

APPENDIX O: RECORD OF AMENDMENTS

Issue 10	:	Full Review to better integrate Environment & Health and align with SHE Way.	27 March 2019, Ian Hogg
Issue 9	:	Full Review undertaken to align the Investigation sections to the new LFI process being rolled out in Met Coal in 2018. Changes made include: <u>Referenced Documents updated.</u>	February 2018, Lynda Butler; Liz Sanderson; Chris Gately
		<ul style="list-style-type: none"> AA_SSDP_11a_GDL – Immediate actions 	

and Preliminary Incident Investigation – now obsolete

- AA_SSDP_11b_GDL_Analysis Investigation Field Guide – now obsolete

- MetCoal11-6_TEM_Significant Incident Teleconference Template now obsolete. Replaced by MetCoal_11-24_TEM_LFI- HPI Feedback Report Template.

-

- Coal 11-7_TEM – Stage 2 Alert Template made obsolete. (now generated from Enablon)

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- New Referenced Document – MetCoal_11-25_GUIDE_LFI Field Guide

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- Reference to QLD CMSHR changed to 2017 version.

- Hyperlinks through the document updated

Section 5.5 updated to align to LFI process – i.e. Enablon process and team selection.

Appendix I: updated to include levels of Occupational Illness.

New Appendix J – Injury Classification Guide Using OSHA Record Keeping Handbook.

New Appendices: K to O – LFI Analysis Tool Templates.

References to Coal (Australia and Canada) changed to Met Coal.

References to the SHE Department and Head of SHE, changed to Head of S &SD and S & SD Department.

Issue 8	:	<ul style="list-style-type: none"> • Removed reference to obsolete form 7_24_Enablon Injury Reclassification Request Form. 	27 July 2016, Graeme Redding
Issue 7	:	<ul style="list-style-type: none"> • Section 5.5 LFI Investigations updated. Reference to LFI Investigation Handbook changed to LFI Investigation 	15 January 2015, Chris Gately

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Field Guides.

- Referenced documents in appendix A updated.
- Coal Australia GDL_11-10_Learning from Incidents Pocket Guide now obsolete.

Issue 6	:	Section 5.4 and 5.5 updated regarding Learning from Incidents and investigation requirements.	14 August 2015, Allan Gordon
Issue 5	:	Section 5.6 Safety Alerts revised and updated	18 May 2015, Allan Gordon
Issue 4	:	<ul style="list-style-type: none"> • Section 5.5 changed HPI Notification. • Section 5.6 -Issue of stage 2 alert. • New appendix H – High Potential Incident Notifications Table created. • Appendix I inserted – Stage 2 Alert Template • References to Met Coal changed to Coal (Australia & Canada) 	19 May 2014, Allan Gordon
Issue 3	:	<p>Additional paragraph inserted in section 5.1 – specifying HPI reporting requirements to Head of Operations and Head of SHE.</p> <p>Reference to AA SSD SPEC 001 Specification for the Scope of Safety & Health Management & Classification & Recording of Incidents removed and replaced by Classification & Recording of Health & Safety Incidents BPP SSD BG 00002.</p>	28 February 2014, Allan Gordon

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Issue 2	:	Fully reviewed.	22 nd July 2013, Allan Gordon
		<u>Replaces:</u>	
		<ul style="list-style-type: none">• AAMC 11-3 Incident Investigation & Reporting.	
Issue 1	:	New document	1 st May 2011, Carolyn Gentle