Potentially serious incidents surveillance program guide

Alberta

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Contents

PSI Surveillance Program Plan

Background

Alberta Occupational Health and Safety (OHS) monitors compliance with Alberta's *OHS Act*, Regulation and Code through educational approaches and enforcement action. This aligns with the prevention principles that build and strengthen health and safety at Alberta work sites.

In June 2018, new OHS legislation was introduced required prime contractors and employers to report any potentially serious incidents (PSIs) that occur on their work sites. This legislation served as a means to:

- gain insight into the health and safety performance of industries operating in Alberta.
- support Alberta OHS's prevention priorities by assisting Alberta OHS in focusing efforts to areas that may have high rates of PSIs.

In December 2018, PSIs were further defined through policy.

On February 12, 2020, the OHS Online Incident Reporting (OIR) service replaced the interim online reporting for PSIs, and mining incidents (MIs). The new OIR service allows prime contractors and employers to:

- set up accounts and have all their information in one spot;
- complete online reports in stages so they can save a report and complete it at a later time;
- have multiple users on one account; and
- upload their investigation reports instead of manually entering the information.

On December 1, 2021, legislation changed to:

- clarify the definition of PSIs; and
- change prime contractors or employers PSI reporting requirements to occur upon investigation completion.

In addition, information collected from PSI reports is used for information and education purposes, and does not result in remedial inspection in most cases.

The PSI Surveillance program resides within the Alberta OHS Surveillance program of the OHS Prevention Services branch.

Program objective

The purpose of a PSI investigation and report is to strengthen the internal responsibility system for employers and prime contractors. PSI reports are surveillance tools that provide information and knowledge for education and prevention, support Alberta OHS internal and external OHS programs and generate knowledge to further OHS prevention in Alberta. PSI information and knowledge is provided to internal Alberta OHS programs and policy makers and OHS system partners, including but not limited to the Workers' Compensation Board, Alberta Health Services, health and safety associations, other agencies, boards and commissions, researchers and other government departments.

The Alberta OHS Surveillance program does this by:

- analyzing information and identifying trends and clusters of incidents, injuries and illnesses within workers, occupations, employers and industries;
- monitoring (under)reporting of PSIs by prime contractors and employers;
- providing resources and support for prime contractors and employers around PSIs and the OIR service;
- informing and supporting the maintenance and updating of OHS PSI systems, including the OIR service and Data Analytics and Statistical Hub (DASH); and

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- being a conduit to PSI information for internal and external stakeholders in aggregate format (i.e., information that will not identify specific employers, prime contractors or incidents), who can use this information for furthering OHS prevention in Alberta.

The PSI Surveillance program will align with Alberta OHS priorities, such as the Prevention Initiative.

Program rationale

The PSI Surveillance program addresses incidents under s.33(5), investigations and reports under s.33(6) and is authorized as a surveillance program under s.56 of the *OHS Act*.

This program will monitor trends in reporting to support the education and awareness of PSI reporting and the importance of employers having a functioning internal responsibility system to track and report work site incidents, as per stated objectives and as outlined in the program guide.

Section 33(6)(d) requires prime contractors and employers to provide a copy of their investigation report to a Director, which includes reports related to PSI incidents.

Section 56 refers to the establishment of a surveillance program to monitor trends in occupational diseases, injuries, exposures, fatalities and incidents, and any other elements specified in regulations.

Section 3 of the OHS Regulation refers to the establishment of the OHS Surveillance Program, which includes monitoring trends and conducting research related to the epidemiology of occupational injuries, diseases, exposures, incidents and fatalities.

Scope and timing

On December 1, 2021, the PSI Surveillance program was implemented and led by the OHS Surveillance Program.

Only the OHS Surveillance Program and select staff from Business Integration (BI) have access to PSI reports in the internal Alberta OHS OIR DASH entity. The BI Analytics team and data mart administrators will have access to the PSI data within the OHS data mart. Other DASH users can view the last date a PSI was submitted from the Work Site Party History report.

Program delivery

The OHS Surveillance Lead is designated a Director of OHS under the *OHS Act* to receive reports under s.33(6) related to PSI incidents only.

Prime contractors and employers report PSIs through the OIR service using their Alberta.ca Account for Organizations.

If prime contractors or employers try to report via the OHS Contact Centre, they will be redirected and provided with information on where to find the online form and how to enter their information.

Publications

PSI publications can be found at alberta.ca/report-potentially-serious-incidents.aspx.

Program metrics

Measures
- Per cent of Workers' Compensation Board (WCB) claims that have been reported as PSI or other mandatory reportable incidents outlined in the *OHS Act*.

Indicators

- Number of:
  - PSIs reported
  - serious, mining and radiation incidents mistakenly reported as PSIs (by type)
  - employers reporting
  - prime contractors reporting
  - trends identified (by type)
  - PSI trends flagged for further action (by type of action)

- Per cent of:
  - industries reporting
  - WCB claims thought to be PSIs reported to OHS
  - PSIs with injured young workers (14-19 years old)
  - PSIs with injured older workers (over 55 years old)
  - PSIs with slip/trips/fall incidents
  - PSIs with musculoskeletal disorder incidents
  - PSIs with psychosocial incidents
  - PSIs by employer size
  - PSIs with an injured person

Evaluation

The Alberta OHS Surveillance Program submits annual performance measures and indicators for internal OHS evaluation. The PSI Surveillance Program is part of that requirement. These measures and indicators are used for continuous improvement.

Communications

PSI webpage provides information and links to further PSI program information. Updates on program will be distributed publically, such as via OHS eNews.

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OIR Employer Reporting

Upon completion of their investigation, employers are to submit a copy of their investigation report to Alberta OHS. The preferred tool for submission is the OHS Online Incident Reporting service (alberta.ca/report-potentially-serious-incidents.aspx). As a copy of the investigation report is required, submissions through the OHS Contact Centre are not sufficient.

For the purpose of this document 'employer' refers to prime contractors and employers, unless otherwise stated.

Screening

Purpose: To provide a tool for employers to determine if the type of incident is a PSI. The screening tool identifies other types of reportable incidents and directs employers to the appropriate method to report those incidents.

Task	Purpose
Update screening tool, when necessary.	To ensure the information provided is current and relevant.

OIR Alberta.ca Accounts for Organizations

Purpose: To provide employers with Alberta.ca Accounts for Organizations. These accounts are necessary to access the OIR service.

Alberta.ca Accounts for Organizations store some keystone information on:

- User profile information:
  - Name
  - Email
  - Phone number
  - Job title

- Organization information:
  - Operational name
  - WCB account number (only one can be entered)
  - Address

The Alberta.ca Account for Organizations owner is automatically assigned an 'administrator' role. They can invite other users to join their account and assign 'administrator' or 'delegate' roles to those users. Administrators can add or delete users from their accounts. It is recommended that Alberta.ca Account for Organizations have at least two administrators. Administrators can also view all PSIs for their account, regardless of whether the administrator or delegate started or submitted a PSI.

Task	Purpose
Employer support: - Setting up an Alberta.ca Account for Organizations. - Structuring an Alberta.ca Account for Organizations (administrators and designates).	To provide support to employers who are having issues with their Alberta.ca Account for Organizations.

OIR Service for PSIs

Purpose: to provide a tool for employers to submit, track, update and print their PSI submissions.

Employers submit a PSI upon completion of their s.33(6) *OHS Act* investigation. The OIR service provides a dashboard for users to view a list of all PSIs submitted by themselves; administrators can view all PSIs submitted under their account. This list includes:

- OIR reference number
- Incident date and time
- Created on date
- Created by name
- Submitted date
- Status

The dashboard provides a button to create a new PSI submission and a button to view the trend report. The trend report provides information from all the PSIs submitted by the user. Administrators can view data from all the PSIs submitted under their account.

Completing all the fields in the OIR service fulfills the employer requirement to provide a copy of their investigation report to a Director. The OHS Surveillance Director has the authority to receive these reports but no other authorities of a Director.

PSIs submitted through the OIR service are marked as 'inactive' within DASH. OIR reports submitted prior to December 1, 2021, are to follow previous operational processes.

Task	Purpose
Employer supports: - Entering data into the OIR service. - Trouble-shooting technical issues with the OIR service.	To provide support to employers who are having issues with their OIR accounts and PSI submissions. To build capacity with external stakeholders on the OIR service.
Update OIR service, when necessary.	To ensure the OIR service is current and relevant.
Data entry for non-OIR service investigation report submissions.	To intake PSI investigation reports. To centralize all data within DASH.
Contact for OHS Contact Centre for PSI related inquiries.	To ensure the OIR service is current and relevant.
Monitor the psi@gov.ab.ca email account.	To address issues, comments and communication related to PSIs.

Internal DASH Intake

Serious, mining and radiation incident monitoring

Purpose: to screen for incidents that are inappropriately reported as a PSI.

At times, employers misreport another type of reportable incidents as a PSI. A DASH view identifies these PSIs and is monitored daily.

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Task	Purpose
Set up DASH view (PSI Action view).	To identify other reportable incidents misreported as PSIs.
Monitor DASH views daily: • Review and flag PSIs to be transferred to other OHS programs. • Create assignment for misreported PSIs. Send to relevant program area. • Open OIR report from view and document PSIs that were flagged but misreported. Close OIR report.	To identify and action PSIs misreported.
Review PSIs flagged for transfer to other OHS programs.	To identify and action PSIs misreported.
PSI generated assignment actioned based on program area.	To move misreported PSIs into the appropriate work flows.

Quality assurance

Purpose: To ensure PSI reports align with reporting requirements. To ensure PSI data is optimal and of the best quality for analytics, reporting and sharing with other authorized parties.

According to the *OHS Act*, s.33(6)(b) and (d), employers are to prepare an investigation report and submit a copy to a Director. PSIs are reviewed for meeting the reporting requirements, not for quality as the requirements do not address the quality of the report (besides the requirements to outline the circumstances of the incident and the corrective action, if any, needed to prevent recurrence). PSIs are flagged for review only when:

• the type or cause of incident or type of injury has been coded as 'Other'. PSIs are reviewed for recoding; and
• employer information is not linked to a WCB account, industry code and/or corporate registration number. PSIs employer information is reviewed to validate employer's WCB status and update accordingly.

When PSI information provided is insufficient for the above actions, the OHS Surveillance Program may engage with the employer (see Employer engagement).

Task	Purpose
Recode 'Other' codes in type and cause of incident and type of injuries.	To ensure data is of the highest quality.
Identify codes that are missing from current lists.	To keep options lists in OIR current and enable employers to find listed options relevant to their PSIs.
Update codes in DASH and OIR services.	To keep options lists in OIR current and enable employers to find list options relevant to their PSIs.
Monitor DASH PSI Missing Employer Account information reports.	To ensure linkage of employer data within DASH.
Update PSIs with missing employer account and industry information.	To ensure linkage of employer data within DASH.

Under-reporting

Purpose: To ensure PSIs are being reported as per employers' regulatory obligations.

The identification of PSI under-reporting can occur in multiple ways. The use of alternative data sources, such as WCB data, can validate the types and volume of PSIs being reported, and those that are not. By looking at key types of WCB claims (e.g., claims that have a high likelihood to result in a PSI) and reconciling this data with the reported PSIs, a reporting gap can be determined. Another method is through OHS officer field observations.

Employers identified as potentially under-reporting PSIs are tracked. The OHS Surveillance Program uses escalating actions to engage these employers (see Employer engagement).

Task	Purpose
Provide WCB data.	To identify employers under-reporting.
Create and maintain coding to reconcile PSI and WCB data.	To identify employers under-reporting.
Identify WCB claims that could potentially be PSIs.	To identify employers under-reporting.
Track prime contractors of employers potentially under-reporting.	To track PSI communication going to specific employers. To monitor gaps in PSI reporting.

Employer engagement

Purpose: To ensure employers are aware and in compliance with PSI legislation requirements.

The OHS Surveillance Program will use a variety of tools to engage with employers. The PSI webpage provides information and links to inform of PSI program information. Updates to the PSI Surveillance program will be shared publically such as distribution via OHS eNews.

The OHS Surveillance Program will use an escalation approach when employer-specific engagement is necessary for incomplete reporting, under-reporting or where there is evidence of a current or ongoing serious occupational health and safety concern. An example of a typical escalation process would be (in order of escalation):

1. email or personal communications with the employer to clarify aspects of a PSI report;
2. letters of education to improve PSI awareness (up to two letters in a given year); and
3. referral for an OHS Inspection.

Please note that if the OHS Surveillance Program identifies a current or ongoing serious health and safety concern, the matter may be referred immediately to OHS Inspections.

Task	Purpose
Send education and/or awareness letters for incomplete PSI reporting and PSI under-reporting.	To improve the quality of PSI submissions.
Track communications with employers.	To track PSI communication going to specific employers.
Track employers consistently misreporting other reportable incidents via OIR PSI service.	To identify employers misreporting using the OIR service.

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Surveillance Analytics and Trending

Purpose: To identify, validate and action PSI trends.

PSI data are trended based on standardized data fields. These data fields can be broad and capture many similar yet distinct characteristics of PSIs. Trend exploration is the administrative process to explore PSI reports and capture more detailed information. With details providing the how, who, where and why, correlations between PSIs identified in a trend can be assessed.

Identify trends

Purpose: To identify trends within prime contractor, employer, worker, work site and industry.

The OHS Surveillance Program creates automated analytical coding systems and algorithms to mine the PSI data for trends. Trends to be identified include:

- employers who have three or more similar PSIs within a year, based on PSI type, PSI source or type of injury resulting from PSIs;
- occupations that have three or more similar PSIs within three months, based on PSI type, PSI source or type of injury resulting from PSIs; and
- industries that have three or more similar PSIs within three months, based on PSI type, PSI source or type of injury resulting from PSIs.

Work site (geographical) surveillance will be offered at a later date.

Task	Purpose
Create and update analytical code.	To generate automated analytical systems to go through PSI data.
Monitor code output for trends.	To identify trends in the PSI data.
Monitor communications with employers for trends.	To identify when administrative communications are not producing the desired outcomes with employers.
Alert when a trend is identified.	To initiate a validation process for a trend.

Validate trends

Purpose: To validate whether a trend is true or not.

When a trend is identified, the trend is validated to assess whether all reports share common features or not. Validation involves:

- identifying specific data elements that are needed to validate the trend;
- creating an exploration data collection tool based on identified data elements and a sub-sample of PSIs;
- reviewing each PSI report identified in the trend and collecting data with the PSI surveillance exploration data collection tool;
- analyzing findings;
- determining if the trend is true or a false-positive; and
- validating findings with other data sources and research.

Validated trends are forwarded to the OHS Surveillance Program for consideration as an emerging occupational health and safety issue in Alberta to be further explored. Actions that can be considered from emerging issues include:

- resource development;
- proactive or focussed inspections programs;
- employer inspection, if the validate trend determines a current or ongoing serious health and safety concern;
- policy development or change;
- research;
- surveillance; and
- stakeholder engagement.

Task	Purpose
Create PSI surveillance exploration data collection form.	To validate PSI trends.
Review PSI and complete exploration data collection form.	To validate PSI trends.
Analyze PSI surveillance exploration data.	To validate PSI trends.
Report aggregate PSI surveillance exploration data findings.	To validate PSI trends.
Review other data sources and research.	To validate PSI trends.
Submit validated trends as an emerging issue.	To action validated PSI trends.

Reporting and Data Sharing

Purpose: To disseminate PSI information to further prevention of occupational illness and injury in Alberta.

The provision of PSI data occurs through static reports (e.g. pdfs), dynamic reports (e.g. dashboards) and data files.

Typically data is provided at the aggregate level. Sharing of detail data needs to be done through agreements according to the *OHS Act*, s.51 and/or s.53 and the *Freedom of Information and Protection of Privacy Act*.

Upon the request from health and safety associations, the OHS Surveillance Program will consider sharing detailed PSI information in accordance with legislation. Shared PSI detailed data is to be used for:

- increasing awareness of work site health and safety conditions, including OHS practices and outcomes;
- researching and developing new training or educational programs or resources;
- targeting communication for specific industry or worker demographics;
- educating and helping employers to reduce injuries and illnesses; and
- assessing OHS practices and outcomes.

Task	Purpose
Develop and maintain information sharing agreements.	To provide PSI data to further prevention of occupational illness and injury in Alberta.
Design reports and data files.	To provide PSI information for OHS system partners to further prevention of occupational illness and injury in Alberta.
Produce routine reports, including dashboards.	To provide PSI aggregate information for OHS system partners to further prevention of occupational illness and injury in Alberta.
Produce routine data files for external OHS system partners.	To provide PSI data[1] to further prevention of occupational illness and injury in Alberta.
Publish aggregate reports on Open Government.	To provide PSI aggregate information for OHS system partners to further prevention of occupational illness and injury in Alberta.

Data and Research Requests

Purpose: To produce knowledge to respond to requests and research questions.

PSI data provides information not available in other data sources. PSI data can be used to respond to data and research requests from internal and external parties.

Task	Purpose
Track and monitor requests for PSI data.	To track requests for PSI data.
Review and fulfill data and research request response.	To release appropriate data based on request and legislative authority (e.g. *Freedom of Information and Protection of Privacy Act*, OHS legislation).

PSI Resources

Purpose: To provide information to further the PSI program, reporting and knowledge.

PSI resources are available on the PSI webpage (alberta.ca/report-potentially-serious-incidents.aspx).

Task	Purpose
Create and maintain PSI OHS information resources (e.g. bulletins and videos).	To provide information to further the PSI program, reporting and knowledge.
Create and maintain PSI website.	To provide information to further the PSI program, reporting and knowledge.

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[1] **When detailed data is provide, it would be in accordance with an information sharing agreement.**

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| Create and maintain PSI website reference documents. | To provide information to further the PSI program, reporting and knowledge. |
| Consultations and presentations. | To provide information to further the PSI program, reporting and knowledge. |

Records Management

Purpose: to comply with the Records Retention and Disposition Schedule.

Task	Purpose
Apply records retention and disposition schedule.	To be in accordance with the OHS Prevention Services branch records management plan.