



Incident Management

Document Number:
FHCP-GL0015A

Procedure – Administrative

Applies To:
Fort Hills Operations and Major Projects

Revision Date: **2017/03/08**
Revision: **0**
Review Cycle: **3**

Document Owner: **General Manager, Excellence & EHS Functional Support**

Summary of Changes

Rev No.	Section Changed	Revisions Made
0		Replaces FHCS-GL0008A and FHCS-GL0012A.

Purpose

To define how incidents (Incidents with Loss or Incidents No Loss) are:

- responded to, reported, classified, causes and actions to prevent occurrence identified, and learnings communicated;
- recorded, retained, and tracked in the IM tool.

This procedure provides the details for implementing [SUN-00010](#) in alignment with OEMS Element 15.

See Appendix E for the Incident Management Summary Requirements.

Compliance

This procedure applies to all personnel working at Fort Hills and Major Projects.

Roles and Responsibilities

The following individuals and groups have the following roles and responsibilities:

- Document Owner**
- Ensures this document is reviewed according to the required revision cycle.
 - Ensures the document is updated to accommodate changes to Suncor, provincial, and federal regulation.
 - Ensures the document is updated to mitigate risks found as the result of an incident.
- Document Approver**
- Ensures this procedure is necessary and that it aligns with management and company direction.

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Roles and Responsibilities (Continued)

Area Leaders	<ul style="list-style-type: none"> • Ensure personnel conform to the requirements of this procedure. • Provide sufficient resources to implement this procedure. • Review and approve findings and recommendations from incident investigations. • Review and approve IIFs. • Ensure the appropriate incident owner is assigned for the incident.
Causal Analysis Facilitator	<ul style="list-style-type: none"> • Performs causal analysis and identifies causes per this procedure.
EH&S	<ul style="list-style-type: none"> • Support the area leaders to meet the requirements of this procedure. • Notify the appropriate government agencies, including regulatory agencies and other stakeholder groups. • Notify the business area legal advisor if a regulator is conducting an investigation, or there are actions required from a regulator.
Incident Investigator	<ul style="list-style-type: none"> • Perform investigations of the incident. • Gather, preserve and analyse evidence/information from all relevant sources such as physical evidence, interviews, witness statements and interviews, paper and electronic data, photos and lab results. • Develop an investigation plan per EHS-GT-0005 for Level 1 investigations
Incident Observer	<ul style="list-style-type: none"> • Identify incidents as they occur within their work area. • Take immediate actions for incidents where possible. • Notify their supervisor or appropriate Suncor management.
Incident Owner	<ul style="list-style-type: none"> • Ensure classification, investigation, causes and actions, and communication of the incident are performed per this procedure. • Assess the need for legal privilege and notify legal when required. • Escalate or de-escalate the incident investigation per this procedure as applicable.
Work Area Supervisor	<ul style="list-style-type: none"> • Activate the Emergency Response Plan where required. • Secure and preserve the scene. • Perform initial classification and notifications. • Collect initial relevant Incident data for the incident record.

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References

- [CO-045A](#), Suncor Policy for Personal Information
- [Completing the Short Form QRG](#)
- [CO-PS01A](#), Suncor's Personal Information Policy
- [CO-S21](#), Alcohol and Drug Testing Standard
- [EHS-GF-0001 Investigation Kit Checklist Form](#)
- [EHS-GF-0002 Evidence Guidance Checklist Form](#)
- [EHS-GF-0003 Witness Statement Form](#)
- [EHS-GF-0004 Measuring Sketching And Recreating The Scene Form](#)
- [EHS-GF-0005 Interview Preparation Form](#)
- [EHS-GF-0006 Chain Of Custody Form](#)
- [EHS-GF-0007 Scene Survey Form](#)
- [EHS-PDD-0002, Process Design Detail Conduct Level 1 Incident Investigation](#)
- [Incident Review Presentation template](#)
- [Incident Occurrence Announcement Template](#)
- [Leaders Documentation Form – Post Incident](#)
- [Post Incident Alcohol and Drug Testing Procedure](#)
- [RGM09009](#) LOPC Reporting
- [RGM17001](#), Corrective Action Management Business Process Manual
- [ST-EH-001A](#), Form for Investigations
- [SUN-00010](#), Incident Management Standard
- [SUN-00039](#) Role of Legal Affairs in Incidents, Incident Investigations and the Preservation of Privilege Guideline
- [SUN-00059](#) Classification of Loss of Primary Containment Guideline
- [SUN-00066](#), Suncor Contractor Management Standard
- [SUN-00154](#) Risk Management Standard
- [SUN-00155](#), Guidelines for Using the Suncor Risk Matrix
- [SUN-00189](#), Corrective Actions Standard
- [SUN-00191](#), Risk Matrix
- [SUN-00194](#), Guidelines for Serious Injury and Fatality Prevention
- [SUN-00196](#) Information Sensitivity Classification Standard
- [SUN-00204](#), Prime Contractor Health and Safety Standard
- [SUN-00217](#), Injury and Illness Classification Guideline

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Terms, Definitions and Acronyms The following terms, definitions and acronyms are used in this procedure

ACFT	Area Cross Functional Team
Action Plans	Summary of actions that align with investigation recommendations, including but not limited to: <ul style="list-style-type: none"> • priority • responsible person • resources (funding/staff) applicable • estimated completion time
Basic Cause	The highest level of cause determined related to an incident. Basic Causes are best practices that can be used to prevent or significantly reduce human error (e.g., good procedures, good quality control, good training). Deficiencies in these best practices lead to increased human error. An example of a basic cause: Procedures, while not using a procedure because it's too difficult / too complex is a root cause.
Causal Analysis	A structured and systematic analysis of causal factors that contributed to an incident's occurrence.
Causal Factor	Mistakes, failures or conditions that, if corrected, could have prevented the incident from occurring or would have significantly mitigated its consequences.
Cause Category	List of contributing behaviours or conditions that may have led to an INL.
CFT	Cross Functional Team
Confidential	The Confidential classification applies to sensitive business information that is intended for strict, controlled use within Suncor. Refer to SUN-00196 Information Sensitivity Classification Standard.
Defect	A defect is a situation, not directly caused by the action or inaction of one or more workers, in an area that may lead to an incident or injury if uncorrected. Defects are normally beyond the direct control of workers. An example of a defect or condition: Process release in area where Maintenance is working.
ERNC	Environment Regulatory Non-Compliance
ESD	Emergency Services Department
EV	Environment consequence receptor
FLOC	Function Location Orientation Code from SAP
GM	General Manager
HS	Health and Safety (consequence receptor)
IIFS	Incident Investigation Findings Summary – A communication used to share important information resulting from an incident investigation.

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Terms, Definitions and Acronyms (Continued)

IM Tool	The enterprise wide tool used to record and retain incident records.
Incident	An unplanned or unexpected event or an unwanted outcome of a business activity that has or could have resulted in injury to a person or damage to or loss of; equipment, material, quality, product, process, the environment, business loss and financial harm.
Incident Alert	A communication used to cascade essential information that requires immediate attention
Incident Investigator	Individual who performs investigation of the incident. This can be the Incident Owner, or other individual that is competent to initiate the incident record.
Incident No Loss (INL)	Also known as a near miss. An incident that did not, but under different circumstances could have resulted in injury to a person, or damage to or loss of; equipment, material, quality, product, process, the environment, business loss, and financial harm.
Incident Occurrence Announcement	A communication used to notify of an incident occurrence and provide information about immediate actions taken to prevent further impact from the incident.
Incident With Loss (IWL)	An incident that has resulted in injury to a person, or damage to or loss of; equipment, material, quality, product, process, equipment, the environment, business loss, and financial harm.
Investigation Level	The amount of rigor put into understanding the causes and actions required for an incident based on actual and potential consequences identified. Refer to Appendix C for determination.
Legal Privilege	At its simplest, privilege is a legal right to refuse to disclose a document or communication in a legal proceeding, such as litigation or a regulatory investigation. It is essential to legal privilege that any such document or communication be confidential. Refer to SUN-00039 Role of Legal Affairs in Incidents, Incident Investigations and the Preservation of Privilege Guideline
LOPC	Loss of Primary Containment
LSRV	Live Saving Rule Violation
Medgate	Software used by Health and Wellness to collect and manage employee health data.
OEMS	Operational Excellence Management System
RG	Regulatory Consequence Receptor
Root Cause	The absence of best practices or the failure to apply knowledge that would have prevented the problem.
Root Cause Analysis (RCA)	The search for the best practices and/or the missing knowledge that will keep a problem from recurring
SIF	Serious Injury Fatality
SLT	Senior Leadership Team
SMART	Specific, Measurable, Achievable, Relevant and Time Bound

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Terms, Definitions and Acronyms (Continued)

SME	Subject Matter Expert
TapRoot	A systematic process, software and training for finding the root cause of problems.
VP	Vice President

Procedure**1. Respond to Incident**

Responsibility	Step	Action
Incident Observer	1.1	Observe incident in work area.
Incident Observer	1.2	Take immediate actions to eliminate or minimize risk of further injuries, environmental impacts or property damage where it is safe to do so.
Incident Observer	1.3	Activate the Emergency Response Plan if required. Note: The following events require activating the Emergency Response Plan: fire, explosion, environmental spill or release, personal H ₂ S monitor alarm, personal injury or illness and entrapment.
Incident Observer	1.4	Immediately notify the appropriate supervisor(s) of the incident. Note: The incident observer's supervisor may not be the work area supervisor and may need to contact the work area supervisor.
Work Area Supervisor	1.5	Secure the incident scene to eliminate or minimize risk of further injuries, environmental impacts or property damage. Perform the following as required: <ul style="list-style-type: none"> • Stop work. • Safe-out equipment and process. • Assess if there is any immediate danger to yourself or other workers. Note 1: Scene security is especially important in incidents where an external agency involvement is likely. For these incidents, the scene must remain frozen until released by a regulatory agency. For non-reportable incidents, the scene must remain frozen until release is authorized by area leadership. Note 2: The only time an incident scene can be disturbed is to attend to an injured person and to prevent further injury or to protect property that is endangered as a result of the incident.
Work Area Supervisor	1.6	Preserve the scene for any physical evidence examination. The following may be required: <ul style="list-style-type: none"> • Remove all non-essential personnel. • Limit access to the area. • Establish boundaries of the incident scene. • Record any visual evidence by taking pictures and documenting details. Note: Consider using the Scene Survey form (EHS-GF-0007) to help ensure initial information is captured.

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Respond to Incident (Continued)

Responsibility	Step	Action
Work Area Supervisor	1.7	Transport injured personnel to a medical treatment facility when required.
Work Area Supervisor	1.8	Determine if alcohol or drug testing is required per CO-S21 . Note: Follow Post Incident Alcohol and Drug Testing Procedure and document the decision / justification for either course of action in the Leaders Documentation Form – Post Incident .
Work Area Supervisor	1.9	Identify actual consequence(s) of the incident per SUN-00191 Risk Matrix.
Work Area Supervisor	1.10	Perform notifications per Appendix A. Note 1: Initial notifications are based on the actual consequence of the incident for IWLs. Notifications for INLs occur after incident classification once potential consequence is confirmed. Note 2: Immediate notification requires either verbal or written confirmation that the notification has been received. All other notifications can be done in writing within the specified timeframe.
Work Area Supervisor	1.11	Report any incident that may require regulatory notification to EH&S. This reporting is critical to facilitate prompt notification to internal and external agencies. Examples include but are not limited to: <ul style="list-style-type: none"> • Injury/illness that results in death • Injury/Illness that results in a worker being admitted to hospital for more than two days • An unplanned or uncontrolled explosion, fire or flood that causes a serious injury or that has the potential of causing a serious injury • The collapse or upset of a crane, derrick or hoist • The collapse or failure of any component of a building or structure necessary for the structural integrity of the building or structure
Work Area Supervisor	1.12	Report all environmental and regulatory incidents immediately as follows: <ul style="list-style-type: none"> • At Fort Hills - the environmental hotline (780-743-6840) • At Oilsands Base Plant – Environmental Affairs On-Call person (780-743-7780) and the Major Projects EH&S Advisor • All other Major Projects sites - your EH&S Advisor for MP
Work Area Supervisor	1.13	Create an Incident Occurrence Announcement for Level 1, Level 2 (Appendix C) and significant incidents (actual HS, EV, RG ≥ C3 incidents).

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Respond to Incident (Continued)

Responsibility	Step	Action
Work Area Supervisor	1.14	<p>Collect initial relevant incident data. This may include, but is not limited to:</p> <ul style="list-style-type: none"> • Initial Incident Record: <ul style="list-style-type: none"> • Where – Location of the incident. • What – Detailed description of incident leading up to and including incident. • When – Date and time of the incident. • Who – Who was involved (internal and external). Indicate positions not names. • How – How the condition was found. • Severity – Actual and potential consequences associated with all receptors. • Immediate Actions – Describe immediate actions taken. • Additional action required – Identify any additional actions taken. <p>Note: Consider using the Investigation Form (ST-EH-001A) to ensure initial information is captured.</p> <ul style="list-style-type: none"> • Pictures • Statements of witnesses (refer to EHS-GF-0003 Witness Statement Form). • Relevant documents or portions thereof as necessary. Examples of documents are in the Evidence Guidance Checklist Form (EHS-GF-0002).
Work Area Supervisor	1.15	<p>Identify both actual and worst credible potential consequence for each applicable receptor.</p> <p>Note: For guidance on how to determine the worst credible consequence, follow SUN-00155 Guidelines for Using the Suncor Risk Matrix.</p> <ul style="list-style-type: none"> • Further secure the scene by taking appropriate immediate protective and corrective measures, including establishing a perimeter and requiring the use of personal protective equipment.
Incident Initiator	1.16	<p>Initiate the incident record in the IM tool within 24 hours.</p> <p>Note 1: Refer to Completing the Short Form QRG for IM tool entry information.</p> <p>Note 2: Entry of personal information into the IM tool must follow Suncor's Personal Information Policy CO-PS01A and Suncor's Personal Information Privacy PG&S CO-045A.</p> <ul style="list-style-type: none"> • In any fields that can be viewed by the general population (event description, title, investigation results), use employee positions not names. • Do not upload photos of actual injuries. • Do not upload A&D testing results. • Personal information such as witness statements and medical impact data must be entered in secure fields within the IM tool (secure fields include: Name of Persons Involved, External Persons Involved, Name of Persons Injured, Statements).

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Respond to Incident (Continued)

Responsibility	Step	Action
Incident Initiator	1.17	Assign initial incident owner based on initial data gathered during the incident response for further screening.

Note 1: The IM Tool will default to the one-up Leader of the Incident Initiator. The Incident Owner can be changed if this is not correct. For example, the Incident Initiator may also be the Incident Owner.

Investigation Level	Incident Owner
Level 1	Business Area Leader – VP/GM/Director
Level 2	Business Area General Manager/Director
Level 3	Work Area Manager
Level 4	Work Area Supervisor

Note 2: Refer to Appendix C Incident Investigation Level Decision Tree

Incident Owner	1.18	Review incident record and determine if there is sufficient information in the incident record to accept ownership. If additional information is required, ensure the information is collected and added to the incident record in the IM tool.
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Note 1: For sites that use the Medgate interface – All Health and Safety Events event records will be generated by Medgate. Confirm the correct location has been selected, if the location is incorrect update the record.

Note 2: For sites that do not use the Medgate interface – The Incident Owner will enter Health and Safety Events and associated Impacts.

Note 3: Confirm the lowest level of FLOC has been selected, the ACFT/CFT and department are entered and correct if applicable.

Incident Owner	1.19	Accept ownership in the IM tool. If ownership is re-assigned, the new owner must agree to the responsibility. If there is disagreement on ownership follow the adjudication process (SUN-00217) Injury and Illness Classification Guideline.
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2. Classify Incident

Responsibility	Step	Action
Incident Owner	2.1	<p>Review and validate all classifications (actual and worst credible potential consequence) information entered in the incident record is correct.</p> <ul style="list-style-type: none"> • Health & Safety • Environment • Regulatory • Reputation • Financial <p>Note: Classifying an incident ensures that all pertinent information is collected to properly categorize and record the actual and potential impacts of the event. There can be more than one impact associated with an event. Additional impacts forms will be created for all identified receptors. Use the Suncor Risk Matrix (SUN-00191) and Risk Classification Guidelines (SUN-00155) to classify the impacts.</p>
Incident Owner	2.2	<p>Ensure the incident record contains the injury classification per (SUN-00217) Injury and Illness Classification Guideline as applicable.</p> <ul style="list-style-type: none"> • Contact EH&S or the injury classification specialist for assistance if required.
Incident Owner	2.3	<p>Ensure the incident record contains regulatory report data and compliance requirements as applicable.</p> <ul style="list-style-type: none"> • Contact EH&S for assistance if required.
Incident Owner	2.4	<p>Review and validate the incident investigation level using Appendix C.</p> <p>Note: If, after determining the level of investigation required, an incident owner wants to escalate or de-escalate the level of investigation, they record the justification within the incident record and obtain approval as identified below. The following guidance can be used to help determine whether or not an incident should be escalated or de-escalated to a different investigation level.</p> <ul style="list-style-type: none"> • Escalation of an investigation: <ul style="list-style-type: none"> • The likelihood of re-occurrence is high • Repeat event • De-escalation of an investigation: <ul style="list-style-type: none"> • Known issue where the value of doing an investigation is not warranted • Actions already exist from related event • The mechanism of injury cannot be determined (illness)

If escalating or de-escalating ...	then obtain approval from ...
<ul style="list-style-type: none"> • De-escalating level 1 to level 2 • Escalating level 2 to level 1 	Business Area VP, GM or Director and the VP EH&S
<ul style="list-style-type: none"> • De-escalating level 2 to level 3 • Escalating of level 3 to level 2 	Business Area GM or Director and the Business Area EH&S Director
<ul style="list-style-type: none"> • De-escalating level 3 to level 4 • Escalating level 4 to level 3 	Incident Owner's discretion

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Classify Incident (Continued)

Responsibility **Step** **Action**

Incident Owner 2.5 **Determine** if a contractor was involved in the incident.

Was a general or sub-contractor involved in the incident ...	then ...
No	Continue to step 2.6
Yes	<ul style="list-style-type: none"> • Ensure a Suncor representative follows the Contractor Management Standard (SUN-00066) and is assigned to: <ul style="list-style-type: none"> • Support the contractor as required. • Provide a quality check of the contractor's investigation. • Go to step 2.6.

Incident Owner 2.6 **Verify** incident is a Suncor incident.

Note: Examples of incidents that are not Suncor related include (definitions of a Suncor incident ([SUN-00217](#)):

- Prime contractor events
- Non-occupational injuries
- Natural disaster (e.g., fire, flood, tornado)
- Human resources issues
- Planned run-to-failure (maintenance)
- Off duty activity or event

Is incident a Suncor incident ...	then ...
No	Close the event in the IM tool and exit this procedure.
No – Prime Contractor Event	<ul style="list-style-type: none"> • Refer to incident management requirements in SUN-00204 Prime Contractor Health and Safety Standard. • Ensure prime contractor performs an independent investigation. • Log investigation findings and supporting documents in the incident record in the IM Tool.
Yes	Go to step 2.7.

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Classify Incident (Continued)

Responsibility	Step	Action
Incident Owner	2.7	<p>Determine the need for legal privilege or confidential.</p> <p>Note 1: Refer to Privileged and Confidential Events in Enablon for IM tool entry information.</p> <p>Note 2: If any of the following criteria exist consult with the business area legal advisor to determine the need for legal privilege:</p> <ul style="list-style-type: none">• There is reasonable expectation of regulatory investigation, enforcement or litigation (including fines, penalties or other legal action).• The event may pose a threat to Suncor's license to operate.• The event has the potential to damage Suncor's reputation.• The Incident Owner is unsure whether any of the above requirements apply.

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*Classify Incident (Continued)***Responsibility Step****Action**Incident Owner 2.8 **Identify** any additional classifications based on the table below.

Does it involve ...	then ...
Security Event or Aviation Event	Report incident to corporate security and exit procedure. Note: Security and aviation events must only be initiated in the IM tool by someone with the proper authority to do so. If you are unsure or if you have entered the incident in error, contact your EH&S advisor for guidance.
Process Safety	<ul style="list-style-type: none"> Select the type of process safety: <ul style="list-style-type: none"> LOPC (use SUN-00059 Classification of Loss of Primary Containment Guideline for identification of LOPC events). Other Process Safety Event. Types of other process safety events include but are not limited to: <ul style="list-style-type: none"> Safe operating limit excursion Standard limit exceedance Primary containment inspection or testing results outside acceptable limits Demand on safety systems
SIF Precursor or Life Saving Rule Involved	<ul style="list-style-type: none"> For any incident with a potential HS C5 or C6 or for any violation of a fundamental lifesaving rule requirement, a SIF precursor must be selected. Use the SIF Guidelines (SUN-00194) to identify appropriate SIF Precursor or Life Saving Rule involved Note: This field does not indicate a LSRV. A LSRV is entered on the Cause form upon completion of the investigation
ERNC Non-Compliance	<ul style="list-style-type: none"> Includes environmental noncompliance incidents ranked actual Regulatory Consequence C3+ 'Regulatory limit/Requirement breached: formal regulatory reporting triggered', as defined by the Suncor Risk Matrix. Any Environmental incident that breaches a regulatory limit (prescribed threshold required by legislation, approval or permit from a regulatory authority) or requirement (any law, act, regulation, license, standard, approval, authorization, directive and/or permit applicable to Suncor's activities) and that triggers formal regulatory reporting Note: Contact EHS and/or Environment and Regulatory groups for all incidents as regulatory bodies may require notification and may investigate
Mode of Operations	Identify the mode of operations at the time of the incident. Note: Start-up/Commissioning and Start-up (C&SU) must be selected for C&SU incidents
Work Shift	Select the appropriate work shift when the incident occurred.
Repeat Events	Identify if there are other events that have occurred under the same or very similar circumstances.

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Classify Incident (Continued)

Responsibility	Step	Action
Incident Owner	2.9	Ensure appropriate Suncor notifications have been completed per Appendix A. Note: Additional notifications may be required based on the investigation level.
Incident Owner	2.10	Review initial data gathered to verify Incident Ownership.

Was the incident caused by a defect in the work environment?	then ...
No	<ul style="list-style-type: none"> The incident is owned by the injured person's function or business unit Continue to step 3.1
Yes	<ul style="list-style-type: none"> The incident is owned by the function / business unit responsible for maintaining the work environment where the injury or illness took place Reassign the Incident Owner in the IM Tool Go to step 1.19 <p>Note: The new owner must agree to the responsibility of ownership before changes are made in the IM Tool. If there is disagreement on ownership, the original Incident Owner shall proceed with the investigation while reviews and adjudications are in progress to ensure a timely investigation is started.</p>

Note: Incident Ownership is complex. In cases where multiple groups are working in an area when an incident occurs, the Business Area leaders (at the appropriate level based on the investigation) will determine ownership. The Corporate Adjudication process will be initiated where agreement cannot be reached on incident ownership. The Incident Owner shall proceed with the investigation based on the original classification while reviews and adjudications are in progress to ensure a timely investigation is started.

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3. Investigate

Responsibility	Step	Action										
Investigation Lead	3.1	<p>Perform investigation per requirements in Appendix B.</p> <p>Note: If during the investigation process it was determined that the incident was classified incorrectly, notify the incident owner who must ensure all appropriate notifications are made and all requirements of the new level of investigation are followed.</p> <table border="1"> <thead> <tr> <th>Investigation Level</th> <th>Incident Investigator</th> </tr> </thead> <tbody> <tr> <td>Level 1</td> <td>Central Investigations Group to assign an Incident Investigator and RCA Facilitator.</td> </tr> <tr> <td>Level 2</td> <td>EH&S to assign an Incident Investigator and RCA Facilitator.</td> </tr> <tr> <td>Level 3</td> <td>Assign an individual as Incident Investigator who is sufficiently trained and/or experienced in determining the basic cause. Note: This is usually a Manager</td> </tr> <tr> <td>Level 4</td> <td>Assign a Supervisor to complete investigation.</td> </tr> </tbody> </table>	Investigation Level	Incident Investigator	Level 1	Central Investigations Group to assign an Incident Investigator and RCA Facilitator.	Level 2	EH&S to assign an Incident Investigator and RCA Facilitator.	Level 3	Assign an individual as Incident Investigator who is sufficiently trained and/or experienced in determining the basic cause. Note: This is usually a Manager	Level 4	Assign a Supervisor to complete investigation.
Investigation Level	Incident Investigator											
Level 1	Central Investigations Group to assign an Incident Investigator and RCA Facilitator.											
Level 2	EH&S to assign an Incident Investigator and RCA Facilitator.											
Level 3	Assign an individual as Incident Investigator who is sufficiently trained and/or experienced in determining the basic cause. Note: This is usually a Manager											
Level 4	Assign a Supervisor to complete investigation.											
Causal Analysis Facilitator	3.2	<p>Perform causal analysis and identify causes based on investigation level.</p> <p>Note: Minimum expectations for causal analysis are:</p> <ul style="list-style-type: none"> • Level 1 and 2 – TapRoot Root Cause Analysis (RCA) • Level 3 – Incident Owner to select a causal analysis method that will identify appropriate corrective actions. At a minimum Basic Cause will be determined. 										
Causal Analysis Team	3.3	Identify recommendations to prevent recurrence of the incident for each cause identified in step 3.2.										
Incident Owner	3.4	<p>Ensure investigation and causal analysis is completed within 7 days for all incidents with exception of Level 1.</p> <p>Note: Reports / dashboards are available within the IM Tool to track completion.</p>										
Incident Owner	3.5	Review and approve causes identified in step 3.2.										
Incident Owner	3.6	<p>Determine if the incident involved a LSRV based on the results of the investigation and causal analysis.</p> <p>Note 1: If it is confirmed the incident involved a LSRV, EH&S must be engaged to review and approve.</p> <p>Note 2: Confirm the LSRV has been documented in Cause Form in the IM Tool.</p>										

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Investigate (Continued)

Responsibility	Step	Action
Incident Owner	3.7	<p>Ensure that the investigation information is correct and entered into the incident record.</p> <p>Note: For contractor led investigations, if the Suncor representative is not satisfied with the outcome of the contractor investigation, Suncor may request the contractor re-investigation or may conduct their own investigation.</p>
Incident Owner	3.8	<p>Evaluate the likelihood of the incident recurring per SUN-00191 Risk Matrix to determine the risk ranking and risk owner.</p> <p>Note: Risk ranking is determined based on the previously determined worst credible potential.</p>

4. Identify Corrective Actions

Responsibility	Step	Action
Incident Owner	4.1	Approve recommendations identified in step 3.3.
Incident Owner	4.2	<p>Develop actions based on the identified recommendations.</p> <p>Note 1: Actions must be SMART and target the causes and focus on preventing reoccurrence by following the hierarchy of controls. Clearly written corrective actions allow little opportunity for confusion. A good practice is to word a corrective action as a stand-alone expression that includes an explanation of why it was made and the specific consequences to be avoided.</p> <p>Note 2: Refer to SUN-00189 Corrective Actions Standard and RGM17001 Corrective Action Management Business Process Manual for the development and management of corrective/preventative actions.</p> <p>Note 3: Actions must be classified as corrective/preventative, learning, interim or general</p>
Incident Owner	4.3	<p>Ensure actions are entered into the incident record and assigned to an action owner.</p> <p>Note: Refer to SUN-00189 and RGM17001 to properly assign ownership of corrective and preventative actions.</p>
Incident Owner	4.4	<p>Determine if the Risk Register requires updating.</p> <ul style="list-style-type: none"> • If yes, follow SUN-00154 Risk Management Standard.
Incident Owner	4.5	<p>Determine the need for the actions to be marked Legal Privilege</p> <p>Note: The declaration of the event as Legal Privilege does not automatically mean corrective actions from the same event will inherit privilege status (Refer to SUN-00039, Section 3.2.2). The corrective actions will have to be reviewed by Legal Reviewer to be declared as privileged.</p>

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Identify Corrective Actions (Continued)

Responsibility	Step	Action
Incident Owner	4.6	Determine if there are any applicable learnings that should be shared through the development of an Incident Alert or IIFS. Note: See Appendix D for specific communication requirements.
Incident Owner	4.7	Develop an Action Plan for a learning type action for all Incident Alerts or IIFS identified in step 4.6 and identify and assign an action owner. Note: Learning type actions are required for all Level 1 and 2 investigations.

5. Close

Responsibility	Step	Action	
Incident Owner	5.1	Is Incident Legal Privilege ... then ...	
		Yes	Go to step 5.2.
		No	Go to step 5.3.
Incident Owner	5.2	Obtain approval on all privileged investigations from the business area legal advisor before finalization or distribution of leadership review summary information.	
Incident Owner	5.3	Review incident record and ensure all requirements from Appendix B are completed.	
Incident Owner	5.4	Close incident. Note 1: The incident record can be closed before completion of all associated actions. Note 2: The incident record must be closed within 30 days (with the exception of Level 1 investigations). If the incident record cannot be closed within 30 days, the appropriate GM must be contacted to obtain approval for an extension. The incident owner must create and assign the GM an action in the incident record, including specific reasons for extension. When creating the action, the type selected must be general (found under summary).	

6. Communicate and Learn

Responsibility	Step	Action	
Learnings Action Owner	6.1	Create Incident Occurrence Announcement or IIFS . Note 1: Refer to Appendix D for specific requirements related to announcements and IIFS. Note 2: Use the Communications Guideline to support in the development of alerts and IIFS documents.	
		6.2	Approve the Incident Occurrence Announcement or IIFS.
		6.3	Send Incident Occurrence Announcement to the email distribution list in Appendix D

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Communicate and Learn (Continued)

Responsibility	Step	Action
Incident Owner	6.4	Submit IIFS to EH&S for review and approval.
EH&S	6.5	Review IIFS and evaluate applicability and quality of information. Provide feedback to the Incident Owner. Note: If any changes are required to the IIFS, work with the incident owner to ensure owner agrees with and approves all changes.
EH&S	6.6	Submit IIFS to the Central Learning Repository and send an email to the distribution list in Appendix D.
EH&S	6.7	Review, evaluate and publish learning into the Central Learning Repository.
Learnings Actions Owner	6.8	Upload Incident Occurrence Announcement or IIFS into the Learnings Action and close action in IM Tool.

7. Weekly Incident Review Process

Responsibility	Step	Action
EH&S	7.1	Distribute weekly list of all incidents in IM tool to Business Unit Leaders.
EH&S	7.2	Facilitate weekly incident review meeting. Note: The purpose of this meeting is to provide a learning opportunity about incident investigation and causal analysis, to improve the quality of the incident management process and corrective actions, and to follow-up on any overdue corrective actions
EH&S	7.3	Select incidents to be reviewed at the weekly meeting and invite appropriate incident owners. Note: Incidents are selected with input from the Business Unit General Managers / Directors and must include incidents that are: a level 1 or 2 investigation, potential LSRVs, and significant incidents (actual HS, EV, RG ≥C3).
Incident Owner	7.4	Present incident details and findings at weekly meeting.
EH&S	7.5	Verify actual consequence, potential consequence and likelihood of incidents reviewed.

8. Quality Review Process

Responsibility	Step	Action
EH&S	8.1	Generate monthly Incident Quality scorecard
EH&S	8.2	Review and validate compliance scorecard
EH&S	8.3	Assess incident quality for all Level 1 and 2 incidents, and on 20 incidents or 25% of incidents, whichever is greater.
EH&S	8.4	Document incident quality assessment in scorecard before month end stewardship data submission date.

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9. Quarterly Incident Review Process

Responsibility	Step	Action
EH&S	9.1	<p>Schedule quarterly meetings for the year, confirm sponsor for each meeting and invite Business Unit Leaders and embedded EH&S Leaders.</p> <p>Note: Rotating sponsorship by MPSLT and FHOLT members is typical.</p>
EH&S	9.2	<p>Select two incidents to be reviewed at the meeting.</p> <p>Note: Incidents are selected from Level 1, Level 2, and actual HS, EV, RG \geqC3 and above incidents from the previous quarter, with input from the meeting sponsor.</p>
EH&S	9.3	<p>Advise incident owner to prepare incident review slides using the Incident Review Presentation template.</p> <p>Note: The goal is to deliver the right amount of information to establish understanding, encourage discussion and share learnings, and to avoid re-investigating the incident and re-evaluation of the findings in the meeting.</p>
EH&S	9.4	<p>Distribute agenda and applicable IIFS and incident review presentations (as available) to meeting attendees.</p>
Incident Owner	9.5	<p>Present incident review presentation at meeting.</p>
EH&S	9.6	<p>Take notes of key highlights/learnings from meeting, review with meeting sponsor and email to meeting attendees.</p>

End of Procedure

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Approved By: Rod Daniels, Manager H&S FHO

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Appendix A –Notification Matrix**Purpose**

Immediate verbal notification is based on actual consequence: Escalation should occur through the functional organizations (Operations, Maintenance and Technical) based on reporting structure. If the point of contact cannot be reached, escalate to the next supervisory / management level until contact has been made. Be clear who is responsible to escalate. Ensure the Area Owner has been included in the notification.

Consequence Ranking		Business / Function							EH&S				Corporate		
		Supervisor	Manager	Director	GM	VP	EVP	Fort Hills Manager Operator Governance	Emergency Services Department	Advisor	Site Lead / Manager	Director / GM	VP	EVP Business Services	President / CEO
Actual	C6	A	A	A	A	A	A	C	A	A	A	A	A	A	A
	C5	A	A	A	A	A	A	C	A	A	A	A	A	A	A
	C4	A	A	A	A	A		C	A	A	A	A	C		
	C3	A	A	A	B	B		C	A	A	A	A			
	C2	A	A												
	C1	A													
INL, C5 or C6 Potential		A	A	A				C		A	A				
		Legend													
		A	Notify immediately (as soon as possible after the event is reported and circumstances verified)												
		B	Notify within 24 hours												
		C	Notify within 48 hours												

Note 1: Environmental and Regulatory Incidents

All environmental and regulatory incidents regardless of consequence level, must be reported to

- At Fort Hills - the environmental hotline (780-743-6840)
- At Oilsands Base Plant – Environmental Affairs On-Call person (780-743-7780) and the Major Projects EH&S Advisor
- All other Major Projects sites - your EH&S Advisor for MP

Note 2: Legal Notifications

Notify Legal for any incident that requires contact with regulators. For C5/C6 H&S Incidents Legal must be contacted prior to contacting Regulators.

Contact the Director of Legal Affairs to determine the need for Legal Privilege ([SUN-00039](#))

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Appendix A (Continued)

Note 3: Insurance Notifications

Contact Insurance where actual Financial consequence is \geq C3

Note 4: Incident Occurrence Announcements

Level 1, Level 2 and actual HS, EN, RG \geq C3 require email notifications as per Appendix D

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Appendix B – Minimum Requirements for Managing Incidents

Purpose To outline the minimum requirements for managing an incident based on level of investigation

	Level 1	Level 2	Level 3 ¹	Level 4
Initial Information Entry				
Date and time of the incident	X	X	X	X
Location of the incident	X	X	X	X
Regulators and stakeholders contacted	X	X	X	X
Identification of the people and companies involved in the incident	X	X	X	X
Description of the incident	X	X	X	X
Actual and potential consequences	X	X	X	X
Information required for SUN-0059 or RGM09009 LOPC Reporting	X	X	X	X
Investigation Requirements				
Incident Investigator from the Central Investigations Group	X			
Establish a Steering Team, Incident Investigation Project Manager, Investigation Charter, and Executive Sponsor.	X			
Names and titles of investigation team members ²	X	X		
Date and time the Investigation started and finished	X	X	X	
Documented investigation plan ³	X	X		
Causal Analysis				
TapRoot ⁴	X	X		
Incident Owner to select a causal analysis method that will identify appropriate corrective actions. At a minimum Basic Cause will be determined.			X	
Summary				
Incident Investigation Findings Summary (IIFS) Use the Communications Guideline to support in the development of alerts and IIFS documents	X	X		
Identification of OEMS element deficiencies and Operational Discipline behaviours related to the Causes	X	X		
Actions				
Corrective Actions to address Root Causes identified	X	X		
Identification of actions planned or taken	X	X	X	X

Note 1: Incident Owners must ensure individuals assigned to complete Level 3 investigations are formally trained to determine Basic Cause.

Note 2: Investigation team members must include SMEs and individuals who are responsible for and familiar with the assets, projects, and activities related to the Incident.

Note 3: Investigation Plan for Level 1 incidents must follow [EHS-PDD-0002](#)

Note 4: Minimum expectations for Causal Analysis are

- Level 1 and 2 – TapRoot.
- Level 3 – an adequate amount of detail and causal analysis to assure appropriate corrective actions.

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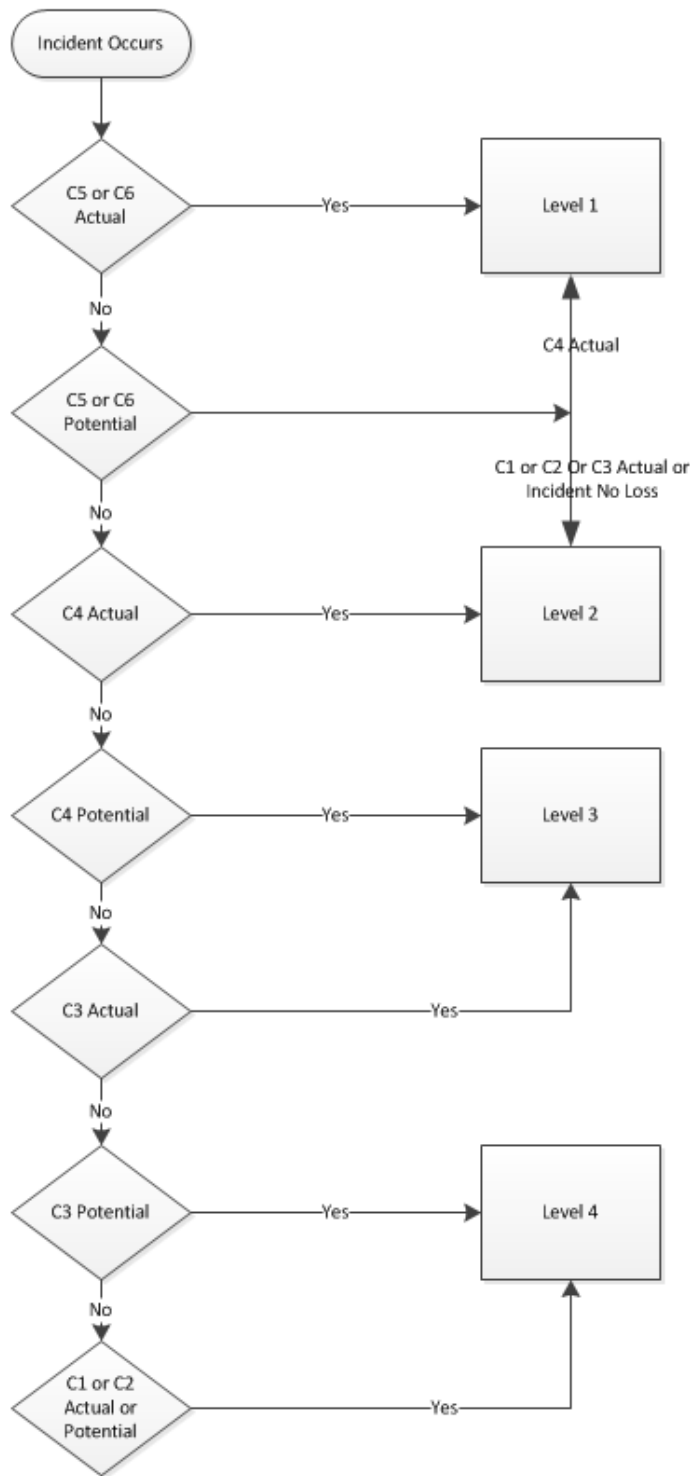
Approved By: Steve Stewart, General Manager, Ops Excellence & EHS Functional Support

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Appendix C – Incident Investigation Level Decision Tree

Purpose

To determine Level of Investigation required based on the highest actual and potential consequence identified.



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Appendix D – Incident Communication Requirements

Purpose To determine communication requirements based on level of investigation or consequence.

For any Incident where a risk or hazard is discovered that may require immediate attention within the business area or in other Suncor business areas, the Incident Owner must develop an [Incident Alert](#) at any point during the investigation.

IIFS may be published for any other incident types when, in the opinion of the Leadership team (including site directors), there is valuable lessons learned to communicate that can prevent injuries or other losses.

Level of Investigation / Consequence	Communication Required	Timeline	Completed By	Additional Information
Level 1	Incident Occurrence Announcement	Within 12 hours	Incident Owner	Incident Occurrence Announcement Send to: CAL_MPG_AI_Announcement_List DL_FH_SITE_ALL
Level 2 Actual HS, EN, RG ≥C3	Incident Occurrence Announcement	Within 24 hours	Incident Owner	Incident Occurrence Announcement Send to: CAL_MPG_AI_Announcement_List DL_FH_SITE_ALL
Level 1	IIFS	At conclusion of investigation	Incident Owner	IM Tool can generate an IIFS from the incident record or IIFS Template download Send to: majorprojectsehs@suncor.com
Level 2	IIFS	Within 30 days	Incident Owner	IM Tool can generate an IIFS from the incident record or IIFS Template download Send to: majorprojectsehs@suncor.com

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**Appendix E – Incident Management Summary Requirements
(following page)**

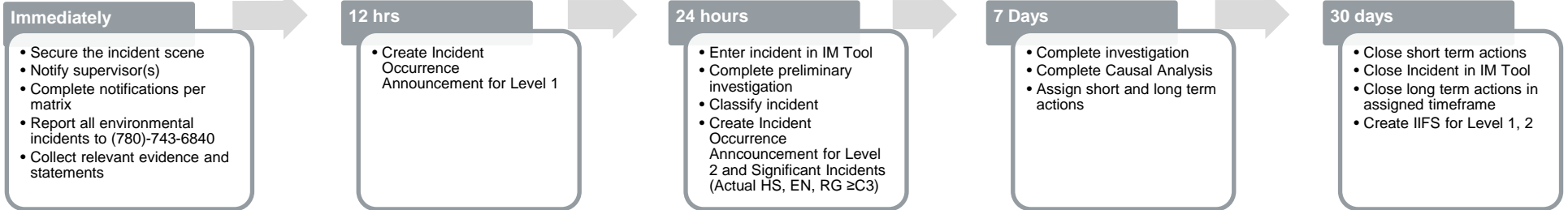
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Incident Management Summary Requirements

Incident Management Timeline



Notifications Matrix

Consequence Ranking		Business / Function							EH&S				Corporate		Additional Information	
		Supervisor	Manager	Director	GM	VP	EVP	Fort Hills Manager Operator Governance	Emergency Services Department	Advisor	Site Lead / Manager	Director / GM	VP	EVP Business Services		President / CEO
Actual	C6	A	A	A	A	A	A	C	A	A	A	A	A	A	A	<p>Immediate verbal notification is based on actual consequence: Escalation should occur through the functional organizations (operations, maintenance and technical) based on reporting structure. If the point of contact cannot be reached, escalate to the next supervisory / management level until contact has been made. Be clear who is responsible to escalate. Ensure that the Area Owner has been included in the notification.</p> <p>Note 1: Environmental and Regulatory Incidents</p> <ul style="list-style-type: none"> All environmental and regulatory incidents regardless of consequence level, must be reported to At Fort Hills - the environmental hotline (780 743-6840) At Oilsands Base Plant – Environmental Affairs On-Call person (780-743-7780) and the Major Projects EH&S Advisor All other Major Projects sites - your EH&S Advisor for MP <p>Note 2: Legal Notifications</p> <p>Notify Legal for any incident that requires contact with regulators. For C5/C6 H&S Incidents Legal must be contacted prior to contacting Regulators. Contact the Director of Legal Affairs to determine the need for Legal Privilege (SUN-00039)</p> <p>Note 3: Insurance Notifications</p> <p>Contact Insurance where actual Financial consequence is ≥C3</p> <p>Note 4: Incident Occurrence Announcements</p> <p>Level 1, Level 2 and actual HS, EN, RG ≥C3 require email notifications as per Appendix D</p>
	C5	A	A	A	A	A	A	C	A	A	A	A	A	A	A	
	C4	A	A	A	A	A		C	A	A	A	A	C			
	C3	A	A	A	B	B		C	A	A	A	A				
	C2	A	A													
	C1	A														
INL, C5 or C6 Potential		A	A	A			C		A	A						
		Legend														
		A	Notify immediately (as soon as possible after the event is reported and circumstances verified)													
		B	Notify within 24 hours													
		C	Notify within 48 hours													

Incident Management Requirements based on Actual Consequence

Incident Consequence	Level of Investigation	Incident Owner (in bold) Recommended Investigation Team	Incident Investigation Criteria	Incident Communication
Actual C5 or C6 SIF ^(a) Actual C4 with Potential C5 or C6	Level 1	Business Area Leader (VP/GM/Dir.) Central Investigations to lead investigation and assign: Steering Team Project Manager Executive Sponsor RCA Facilitator	A formal investigation, including: <ul style="list-style-type: none"> Level 1 Incident Investigation Process (EHS-PDD-0002) must be followed Incident and associated data entered in Incident Management tool For disabling injuries or fatalities the provincial OH&S authority must be notified and may investigate Investigation shall be complete within 7 days Identification of OEMS element deficiencies and Operational Discipline behaviours related to the causes The Incident Owner shall perform an effectiveness review of the corrective actions after they've been complete Leadership review of investigation findings, corrective actions and timeline, expected future residual risk post corrective actions 	<ul style="list-style-type: none"> Incident Occurrence Announcement within 12 hours and send to CAL_MPG_AI_Announcement_List DL_FH_SITE_ALL Incident Investigation Findings Summary (IIFS) at the conclusions of the investigation. IM Tool can generate an IIFS from the incident record or IIFS Template download Send to: majorprojectsehs@suncor.com Incident Summary Overview Presentation Formal Investigation Report
Actual C4 Potential C5 or C6 SIF ^(p)	Level 2	Business Area GM/Dir. Lead Investigator RCA Facilitator Team Leader / Supervisor of Area Employee(s) Involved EH&S Medical (as required) External or internal SME (as required)	A formal investigation including: <ul style="list-style-type: none"> Incident and associated data entered in Incident Management tool Documented Investigation Plan and Investigation team members Root Cause Analysis (RCA) Corrective Actions to address identified root causes For injuries resulting in lost time the provincial OH&S authority must be notified and may investigate Investigation shall be complete within 7 days Identification of OEMS element deficiencies and Operational Discipline behaviours related to the causes The Incident Owner shall perform an effectiveness review of the corrective actions after they've been complete 	<ul style="list-style-type: none"> Incident Occurrence Announcement within 24 hours and send to CAL_MPG_AI_Announcement_List DL_FH_SITE_ALL Incident Investigation Findings Summary (IIFS) within 30 days. IM Tool can generate an IIFS from the incident record or IIFS Template download Send to: majorprojectsehs@suncor.com Formal investigation report
Recordable Injuries – Medical Treatment and Restricted Work (Actual ≥C3)	Level 3	Work Area Manager Employee(s) Involved EH&S Medical (as required) External or internal SME (as required)	A formal investigation including: <ul style="list-style-type: none"> Incident and associated data entered in Incident Management tool Incident Owner to select a causal analysis method that will identify appropriate corrective actions. At a minimum Basic Cause will be determined For injuries resulting in restricted work the provincial OH&S authority must be notified and may investigate Investigation shall be complete within 7 days 	<ul style="list-style-type: none"> Incident Occurrence Announcement within 24 hours and send to CAL_MPG_AI_Announcement_List DL_FH_SITE_ALL Summary of investigation findings
Reportable Environmental and Regulatory Incidents (Actual ≥C3)	Level 3	Work Area Manager Employee(s) Involved EH&S Medical (as required) External or internal SME (as required)	A formal investigation including: <ul style="list-style-type: none"> Incident and associated data entered in Incident Management tool Incident Owner to select a causal analysis method that will identify appropriate corrective actions. At a minimum Basic Cause will be determined Contact the EHS and/or Environment and Regulatory groups for all incidents as regulatory bodies may require notification and may investigate Investigation shall be complete within 7 days 	<ul style="list-style-type: none"> Incident Occurrence Announcement within 24 hours and send to CAL_MPG_AI_Announcement_List DL_FH_SITE_ALL Summary of investigation findings
Actual C3 Potential C4	Level 3	Work Area Manager Employee(s) Involved EH&S Medical (as required) External or internal SME (as required)	A formal Investigation including <ul style="list-style-type: none"> Incident and associated data entered in Incident Management tool Causal analysis to determine basic cause and if action or corrective actions are required Investigation shall be complete within 7 days 	<ul style="list-style-type: none"> For any Incident where a risk or hazard is discovered that may require immediate attention within the business area or in other Suncor business areas the Incident Owner must develop an Incident Alert Summary of investigation findings
Actual C1 or C2 Potential C3	Level 4	Work Area Supervisor Employee(s) Involved EH&S Medical (as required) External or internal SME (as required)	A formal investigation including: <ul style="list-style-type: none"> Incident and associated data entered in Incident Management tool Investigation shall be complete within 7 days 	<ul style="list-style-type: none"> For any Incident where a risk or hazard is discovered that may require immediate attention within the business area or in other Suncor business areas the Incident Owner must develop an Incident Alert

References and Templates

[SUN-00010 Incident Management Standard](#)
[Incident Management Interactive Process Map](#)
[SUN-00189 Corrective Actions Standard](#)
[Corrective Actions Interactive Process Map](#)
[SUN-00191 Revised Risk Matrix](#)
[Level 1 Implementation Toolkit](#)

[SIF Prevention Guideline](#)
[Incident Investigation Findings Summary](#)
[Incident Occurrence Announcement](#)
[Incident Alert](#)
[ST-EH-001A Form for Investigations](#)
[Enablon Training Library](#)

[EHS-GF-0001 InvestigationKitChecklistForm](#)
[EHS-GF-0002 EvidenceGuidanceChecklistForm](#)
[EHS-GF-0003 WitnessStatementForm](#)
[EHS-GF-0004 MeasuringSketchingAndRecreatingTheSceneForm](#)
[EHS-GF-0005 InterviewPreparationForm](#)
[EHS-GF-0006 ChainOfCustodyForm](#)
[EHS-GF-0007 SceneSurveyForm](#)



The following individuals have approved and signed this document.

UserName: Rod Daniels (rdaniels)

Title: Mgr H&S FHO

Date: Wednesday, 08 March 2017, 01:09 PM Mountain Time

Meaning: Approver 1 Signed

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UserName: Steve Stewart (sstewart)

Title: GM Ops Excellence&EH&S Functional Sppt

Date: Thursday, 09 March 2017, 11:44 AM Mountain Time

Meaning: Approver 2 Signed

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