WORKSHEET 2.11

# Incident, Nonconformity and Corrective Action

*Subchapter 2.11 · case in the book: Hanoi*

**GUIDING QUESTION**

Take the last thing that nearly hurt somebody in your hotel. Was the response proportionate to what happened, or to what could have happened, and which of those two does the standard ask for?

This worksheet turns the tools of the subchapter into a form you can fill in. The texts come from the book; the empty columns are for your own property. Adapt it before use: an unadapted checklist is exactly what the book warns against.

## Practical application: what to do in your property

| Step (from the book) | Done? | What we found / owner |
|---|---|---|
| Add one question at the point of reporting: what was the worst credible outcome, and how close was it? Sorting by potential rather than by outcome changes which events get attention, and it costs one field. | | |
| Give incidents and nonconformities one entrance. Two registers with two owners guarantee that whatever is neither an injury nor an audit finding is recorded in a maintenance log and forgotten. | | |
| Put the person who does the work in the investigation. It is in the requirement, and they hold the facts about the layout, the timing and the habit that managers have no reason to know. | | |
| Ask the same-elsewhere question every time and write the answer down. At Hanoi it was two other lightwells with the same detail from the same refurbishment, and nobody had looked at either. | | |
| Record the rung. A corrective action is determined in accordance with the hierarchy, so the form should ask which rung was chosen and why the ones above it were not available. | | |
| Close the loop back to the reporter. The clause requires the information to be communicated to relevant workers; if somebody has to ask three weeks later, the requirement has not been met. | | |

These steps are the book's method, not requirements of ISO 45001. Evidence can take whatever form suits the property; a separate document is needed only where an applicable requirement, or the property's own system, makes it necessary.

## Verification Pact: what is believed, tested against the standard

| What the property took to be true | What actually holds | Our position |
|---|---|---|
| "Nobody was hurt, so it was a maintenance matter." | An incident is an occurrence arising out of or in the course of work that could or does result in injury. Could is in the definition, and an event in which nobody was hurt is an incident rather than a lesser category. | |
| "The response was proportionate to what happened." | Corrective actions are to be appropriate to the effects or potential effects. The only variable between a cleaning job and a fatality that morning was who was standing there. | |

| What the property took to be true | What actually holds | Our position |
|---|---|---|
| “Incidents are the safety function’s; nonconformities belong to the management system.” | The standard puts them in the same clause with the same machinery, and an organisation that runs two registers creates a gap that anything which is neither an injury nor an audit finding falls into. | |
| “The engineer and the general manager investigated it.” | The evaluation is to be made with the participation of workers, and investigating incidents and determining corrective actions is expressly on the list of matters requiring the participation of non-managerial workers. | |
| “The contractor inspected the panel that failed.” | The evaluation must determine whether similar incidents have occurred or could potentially occur. Two other lightwells carried the same detail from the same refurbishment. | |
| “We will remind the team and add it to the inspection round.” | Corrective action is to be determined in accordance with the hierarchy of controls. Reminding is the fourth rung, and the property has to be able to say why the three above it were not available. | |

## Common mistakes: a self-check

| Mistake (from the book) | Present here? | Action / owner |
|---|---|---|
| Sorting events by outcome. The definition of an incident includes what could result, and the clause requires responses proportionate to potential effects. | | |
| Treating a near miss as a lesser category. It is a name people give to an incident, not a separate class with a lighter response. | | |
| Running two registers with two owners. Everything that is neither an injury nor an audit finding falls between them. | | |
| Investigating without the people who do the work. Their participation is in the requirement and they hold the facts that decide the remedy. | | |
| Reaching for a reminder. Corrective action follows the hierarchy, and the fourth rung has to be justified against the three above it. | | |
| Investigating everything exhaustively. It ends the reporting within a year, and a system with no reports has no information at all. | | |
| Never telling the reporter what happened. The clause requires the outcome to be communicated, and its absence is the obstacle named in 1.7. | | |

## Operative synthesis

- An incident is an occurrence that could or does result in injury, so an event in which nobody was hurt is an incident and not a lesser category. And corrective actions are to be appropriate to the effects or potential effects, which means the response is proportionate to what could have happened rather than to who happened to be standing there. Incidents and nonconformities share one clause and one machine, and a property running two registers with two owners has built a gap that catches everything which is neither an injury nor an audit finding.
- The evaluation is made with the participation of workers, determines causes, and asks whether the same thing exists or could occur elsewhere. The action follows the hierarchy of controls and

the management of change, which forecloses the reflex of reminding and retraining; the risks of the remedy are assessed before it is implemented; its effectiveness is reviewed; and the outcome is communicated back to the people it concerns. And the proportionality sentence protects both ends: too small a response to a near miss with catastrophic potential misses the point, and too large a response to everything ends the reporting within a year.

- **A metre and a half of cornice, from the second floor, into the courtyard where the buffet is set up at half past six.** It came down at twenty past. The log said: area cleared, contractor attended, no further action.
- **All of this assumes that somebody reports things.** The requirement that makes reporting possible at all is the one this standard states and the other two in this series do not, and it is the subject of the next subchapter.

## Action plan for our property

| Action | Owner | Due | How we will know it worked |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Source: Francesco Dore, The Helm and the Lens, Volume 3a «The Helm», subchapter 2.11. Edizioni Effedore, 2026. Clause references are paraphrased; this sheet does not reproduce the text of ISO 45001. It is not legal advice: health and safety law is that of the place where the property operates.