

Welcome

- Introductions
- Walk Around
 - Emergencies
 - Toilets
 - Phones
 - Crib area
 - Common room
 - Smoking
- Course Outline
- Outstanding course administration

Introduction

The training course you will complete today is based on the unit of competency RIIWHS301E Conduct safety and health investigations.

Training will cover:

- Determine the objectives and develop investigation plan
- Gather information
- Evaluate information
- Identify course of action
- Prepare and present investigation reports

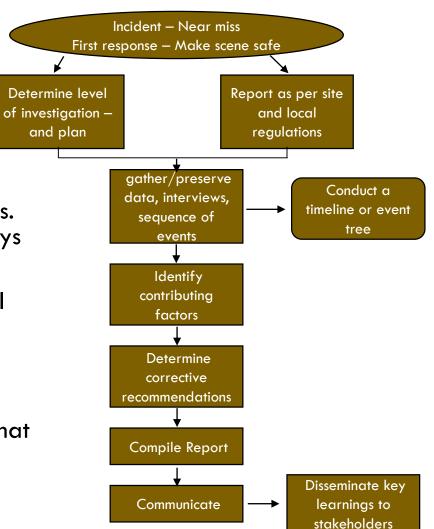
Assessment:

- Theory
- Practical Conduct investigation

Introduction

Safety and Health Investigations

- There are numerous levels and methods for investigation techniques.
 The process is fundamentally the same but applied in different ways according to organisational policies and procedures
- The type of investigation technique will vary depending on several factors:
 - Severity of incident (Level)
 - Organisational procedures and policies
- Most organisations have a ranking/scoring system to identify at what level and method of investigation technique is to be undertaken.
- The training will focus on the fundamentals, not necessary one particular investigative technique.

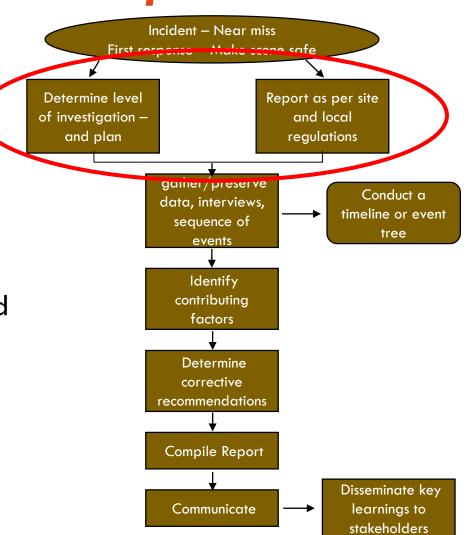


Determine the objectives and develop

investigation plan

Identify, access & interpret work related H&S investigation documentation

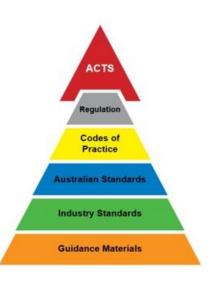
- Determine scope and develop a plan
- Pre and post timeframes meet legislative requirements
- Determine need for eliminating safety hazards and address needs of people involved in incident incorporate in plan
- Test objectives clarify scope
- Consult
- Review and communicate plan



Identify, access & interpret work related H&S investigation documentation

- Several types of documentation deal with incidents and investigations
 - Legislative
 - WHS Act
 - WHS Regulation
 - SafeWork varies between states
 - Notification forms
 - Requirements
 - Organisation
 - Incident investigation manual/policy/procedure
 - SWI's, permits, registers, alerts etc
 - Incident/investigation forms, Witness statements, questionnaires etc
 - Report templates







Identify, access & interpret work related H&S investigation documentation

- Legislative
 - WHS Act

Part 3 Incident notification

- 35 What is a "notifiable incident"
- 36 What is a "serious injury or illness"
- 37 What is a "dangerous incident"
- 38 Duty to notify of notifiable incidents
- 39 Duty to preserve incident sites



Identify, access & interpret work related H&S investigation documentation

- Legislative
 - WHS Regulation

303 Safe work method statement must be kept

- (2) If a notifiable incident occurs in connection with the high risk construction work to which the statement relates, the person must keep the statement for at least 2 years after the incident occurs. Maximum penalty:
 - (a) in the case of an individual—\$1,250, or
 - (b) in the case of a body corporate—\$6,000.



Identify, access & interpret work related H&S investigation documentation

- Legislative
 - WHS Regulation

304 Excavation work – underground essential services information

- (6) The information must be available:
 - (a) if a notifiable incident occurs in connection with the excavation work to which the information relates—for at least 2 years after the incident occurs



Identify, access & interpret work related H&S investigation documentation

SafeWork – varies between states

If there is a serious injury or illness, a death or a dangerous incident, you must report it to us immediately on 13 10 50 as an urgent investigation might be needed.

Incidents can be notified 24 hours a day, 7 days a week by calling 13 10 50.

You must also:

- provide first aid and make sure the worker gets the right care
- take care not to disturb the incident site until an inspector arrives. You can help an injured person and ensure safety of the site.
- record it in the register of injuries
- notify your insurer within 48 hours



Identify, access & interpret work related H&S investigation documentation

- When interpreting documents it is vital that you understand the difference between words such as:
 - **Should** Not mandatory but preferred course of action. If you take a different course of action you will need to be able to justify this in the event of an accident or incident.
 - **Consider** you have a choice of actions and need to select the action that will give the best and safest result.
 - Must the action is a mandatory or legal requirement and has to be complied with.

Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

1 to 8

Determine scope and develop a plan

- Scope
 - Determine exactly what you are investigating in addition to the incident.
 - May need to include surrounding factors as fatigue etc
 - Areas within the scope will include such things as:
 - Near misses
 - Systems
 - Technical processes and procedures
 - Equipment investigations



Determine scope and develop a plan

- Plan
- Factors to consider
 - Pre and post-incident timeframes
 - Severity ranking of the incident by the organisation will dictate what type of investigation is required
 - All types of investigations need to follow a pre-defined plan





Pre and post timeframes meet legislative requirements

- This can include:
 - Legislative reporting requirements
 - Organisation/site reporting requirements
 - Investigations are completed in a timely manner
 - Extension of timeline to ensure appropriate information gathered/considered

Determine need for eliminating safety hazards and address needs of people involved in incident — incorporate in plan

- As part of the investigation process consideration needs to be given to the safety of workers, this includes such things as:
 - Preserving the scene (WHS Act Sect 39)
 - Ensuring the scene is safe
 - Identify, treat, communicate hazards
 - Wellbeing of individuals involved in the investigation
 - Medical treatment
 - Counselling
 - Personal needs



Test objectives — clarify scope

- After the initial objectives have been selected and preliminary enquiries conducted, the objectives and scope of the investigation may need to be adjusted
- Every inquiry will be different and decisions will need to be made on the ground as to what to include and exclude.
- A simple tool that will assist is P.E.E.P.O. which is also the beginning of gathering information/data
 - People
 - Environment
 - Equipment
 - Procedures
 - Organisation





Test objectives - clarify scope

- P.E.E.P.O
- With the information at hand, ask yourself/team some clarifying questions
 - Did it affect worker performance?
 - Did it affect environment?
 - Did it affect equipment performance?
 - Did it affect procedures?
 - Did it affect organisation?
- This will assist in defining the scope and objectives get everything out on the table!
- As information is gathered it can also be categorised to assist in building a complete picture

Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

9 to 14



Consult

- You should never assume that just because the incident or accident has occurred in your workplace that you automatically have priority over resources to investigate, or the authority to investigate.
- Other agencies that may conduct investigations, which will take priority, could include:
 - Police
 - Fire
 - SafeWork
 - Regulators i.e. Mining
 - Environmental protection authority (EPA)
- Always ensure you follow work place polices and procedures especially in consulting outside agencies, organisations.

Review and communicate plan

- Review looking for:
 - Level of authority
 - Level of investigation
 - Resources.
 - Timeframes.
 - Workplace.
 - Legislative or regulatory restraints.
 - Scope
 - Objectives



Review and communicate plan

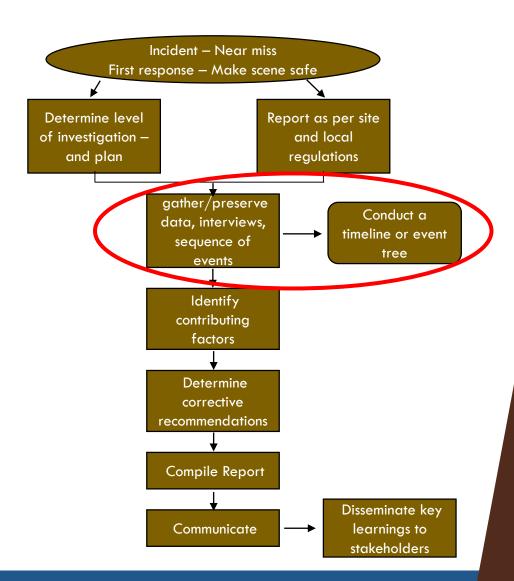
- Communicate
 - Stakeholders
 - Internal
 - Director/GM/SSE
 - Managers
 - Health and Safety
 - External
 - Regulators
 - Police

Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

15 to 19

- Maintain security and integrity of evidence
- Plan and prepare for systematic collection of information
- Schedule information collection
- Confirm methods used to collect and examine information
- Collect, test and organise information



Maintain security and integrity of evidence

- Scene
 - Secure/preserve the scene (protect evidence & legislative requirement)
 - May not be able to be release without external authorisation
 - Until gathering of evidence is completed
 - Might need to station a sentry/guard
- Collected evidence
 - Photos, statements, diagrams etc
 - Keep secure investigation team only
 - May need to isolate the evidence depending on what it is









Plan and prepare for systematic collection of information

- Depending on the complexity of the incident, may need to conduct a formal planning stage prior to collecting data and interviewing personnel. The planning stage would normally commence with the following considerations:
 - Select a suitable, secure room as the investigation team headquarters.
 - Obtain administrative assistant.
 - Decide when to visit and photograph incident scene.
 - Obtain written statements (to the company and external authorities) that may have been requested of individuals at the incident scene.
 - Arrange to interview participants, witnesses, management staff, support staff, or anyone who may have useful information.
 - Obtain maps, diagrams, and photographs that may be helpful to the investigation.



Plan and prepare for systematic collection of information

- Continued
 - Brainstorm the scope of the investigation
 - Outline a plan of action and allocate tasks
 - Identify any additional specialists required to assist in the investigation
 - Set up control and recording procedures for gathered evidence
 - Select a date to start preparing the incident report
 - Minute the meeting
 - Set the date, time, and place for the next meeting

Schedule information collection

- The collection of Information and data should be scheduled in a systematic process to avoid the need to backtrack and needs to consider such things as:
 - Timings
 - Weather
 - Reporting obligations / legislative requirements
 - Shift / rosters
 - Further testing / concurrent activities (might need to test evidence) allow time for results
 - Availability
 - Organisational / Operational demands

Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

20 to 25

- Referring back to P.E.E.P.O.
- Conditions, actions or deficiencies in each of the five main areas may be identified as contributing factors to the subsequent incident.
- To ensure that all the facts are uncovered, ask the broad questions such as "who? what? when? where? why? and how?"





- People
 - Interview
 - Explain in their own words what happened, taking care not to ask leading questions.
 - Explain their actions immediately prior to the incident.
 - Explain any actions taken to reduce risk in the task being conducted.
 - Whether they knew of any safety features or PPE required for the task.
 - Whether they knew of any previous incidents or near misses associated with conducting the task.
 - What could have been done differently to prevent the outcome.

Confirm methods used to collect and examine information

People

- What experience in the task did those involved in the incident have?
- What training had they received?
- What physical limitations may have affected the way they conducted the task?
- What was the status of their health?
- What do you know about the period of time they have been at work or previously had off?
- Are you aware of any stress or time pressures (work or personal) that may have affected them?





- Environment
- The physical environment, and especially sudden changes to that environment, are factors that need to be identified.
- The situation at the time of the incident is important, not what the 'usual' conditions were. For example, incident investigators may want to know:
 - What were the weather conditions?
 - Were any housekeeping issues involved?
 - What were the workplace conditions?
 - What surrounding noises were present?
 - What were the light conditions?
 - Were toxic or hazardous gases, dusts or fumes present?





- Equipment
- Pay particular attention to the condition of equipment e.g. abnormal stress, modifications, substitutions, distortions, fractures etc. Identify any design flaws, mismatched components or confusing labelling or marking. Ensure that the equipment was appropriate for the task being conducted.
- To seek out possible causes resulting from the equipment and materials used, investigators might ask:
 - How did the equipment function?
 - Were hazardous substances involved?
 - What identification did they have?
 - Were any alternative substances available?
 - What was the state of the raw material?
 - What personal protective equipment (PPE) was being used?





- Procedures
- Examine the work procedures and the scheduling
- Examine the availability, suitability, use and supervisory requirements
- Look for answers to questions such as:
 - What work procedure was used?
 - Was a Job Safety Analysis conducted as part of the planning prior to the task?
 - Had conditions changed that would have effected the way the normal procedureworked?
 - What tools and materials were available?
 - Were they used?
 - How did the safety devices work?
 - What lockout or isolation procedures were used?



- Organisation
- The role of supervisors and management must always be considered in an incident investigation. Answers to any of the preceding types of questions logically lead to further questions such as:
 - What applicable safety rules were communicated to employees? When?
 - What written procedures were available?
 - How were they enforced?
 - What supervision was in place?
 - What training was given? When? Is it still valid and current?

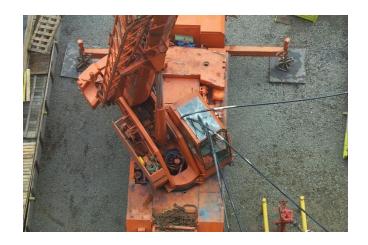
- Incident scene
- The investigation team should verify the following:
 - Positions of injured workers.
 - Materials being used.
 - Position of all equipment in relation to other equipment.
 - Position of valves, switches, controls etc.
 - Condition of the load bearing surface.
 - Safety devices in use.
 - Position of appropriate guards.
 - Damage to equipment.
 - Accessibility and evidence of congestion.



- Incident scene cont
 - Illumination, visibility and noise levels at the site.
 - State of housekeeping at the site.
 - Condition of the facility and equipment.
 - The effects of weather.
 - Presence and location of witnesses.
 - Presence of unauthorised personnel.
 - Evidence of safety equipment failures.
 - Evidence of loss of containment.
 - Witness marks (gouges, scratches, smears, discolouration, burn marks etc.).
 - Evidence of excessive force.
 - Presence or absence of warning signs or barriers.
 - Results of other inspections by company representatives or external authorities.

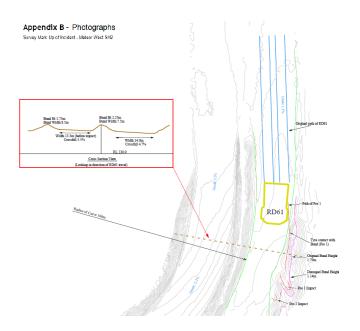


- Photography
- A photograph without a proper caption is confusing and of little value.
- Photographs taken at the accident scene should include the following:
 - An overall view of the incident site (wreckage) taken from a minimum of four directions.
 - Eight photographs taken at 45-degree angles is recommended.
 - A view of the path of the equipment from point of initial and major impact to the place where it came to rest. Impact marks are vulnerable to rain and traffic; therefore, a photographic record of this type of evidence should be obtained.





- Photography cont
 - Aerial views of the accident scene (equipment and weather permitting).
 - Photos of objects struck by the equipment.
 - Larger portions of the equipment wreckage.
 - Detailed photographs of suspected failed parts that contributed to the accident.
 - Photos of failed personal protective clothing and equipment and the agents causing the failure or injuries.
 - Photograph and measure skid marks, ground scars etc.
 - Any other photographs deemed of interest to the investigation team



- Organisation
 - How were hazards identified?
 - What procedures had been developed?
 - How were unsafe conditions corrected?
 - Was regular maintenance of equipment carried out?
 - Were regular safety inspections carried out?
 - Were there any changes to equipment, environment, people or procedures?

Collect, test and organise information

- Collect information as previously discussed
- Test the information by asking the clarifying questions did it contribute to the incident?
 - You are looking to start culling information gathered to ascertain if it had an impact on the incident (pre or post)
- If it is identified as a contributing factor, they can be organised and placed accordingly (PEEPO)
 - This is why sticky notes are useful

Collect, test and organise information

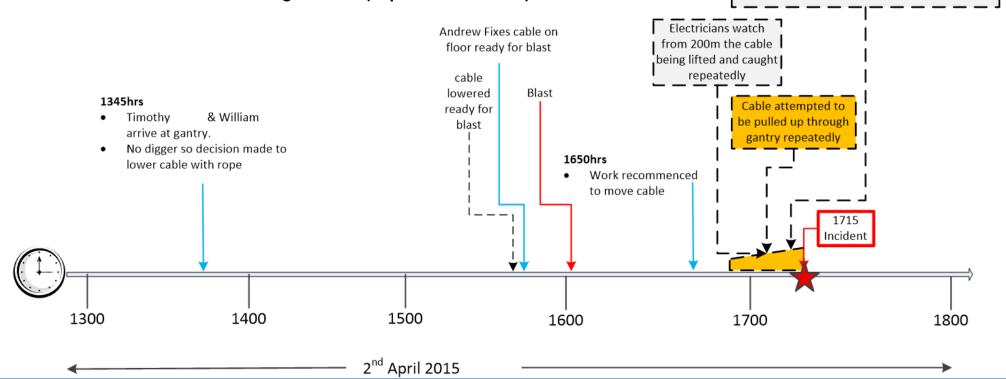
- To assist with the organising of information and now that you have identified contributing factors the information can be organised further.
- Common methods are:
 - Incident Timeline
 - Incident Fault Tree
 - Event and conditions chart

Commonly used for more complex incidents where higher level investigations are required i.e. ICAM etc

• 5 Whys — Commonly used by the supervisor for lower level incidents

Collect, test and organise information

• Incident Timeline – Cable Management (Injured worker)

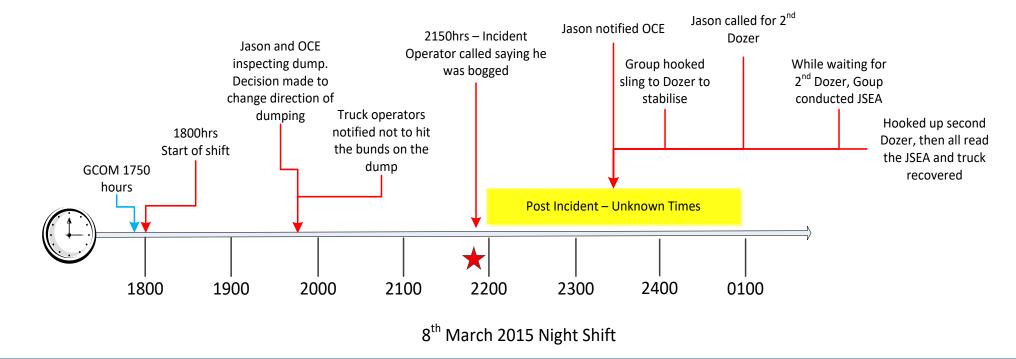


Timothy on drive around with oncoming

coordinator

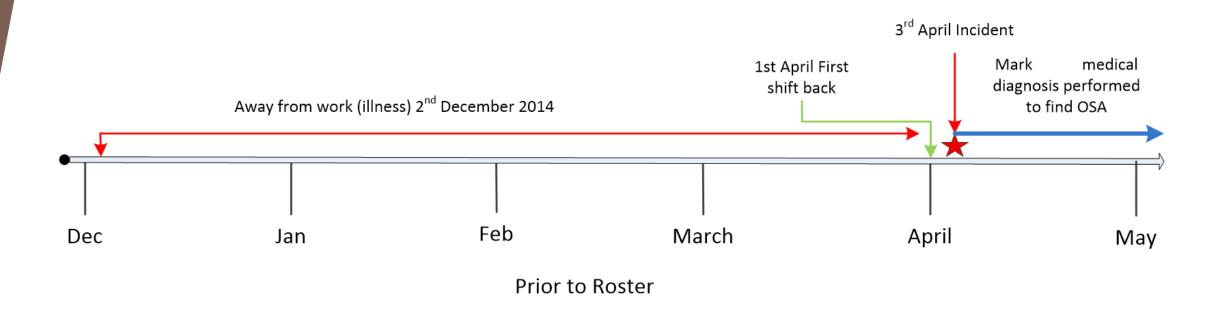
Collect, test and organise information

• Incident Timeline – RD Through bund at Tip Head



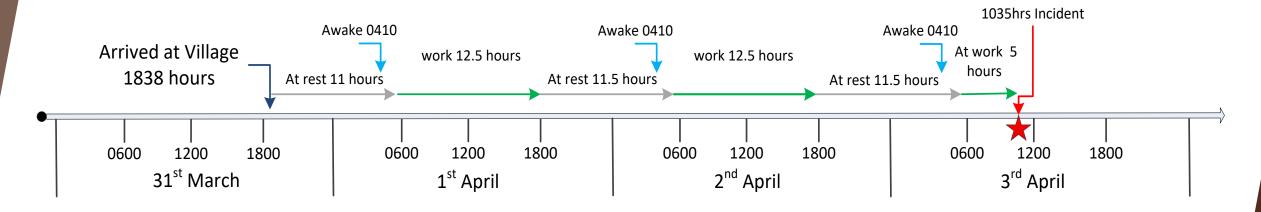
Collect, test and organise information

• Incident Timeline – RD Unplanned Movement (Operator Fell Asleep) - overview



Collect, test and organise information

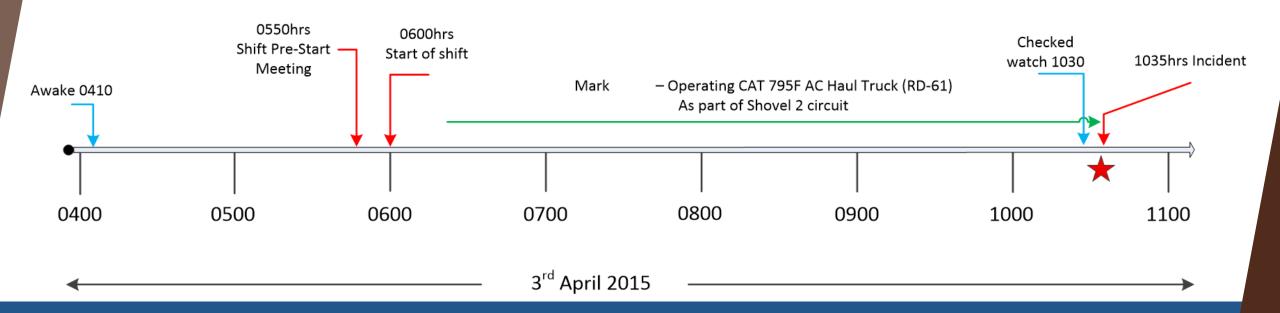
• Incident Timeline - RD Unplanned Movement (Operator Fell Asleep) cont



Roster

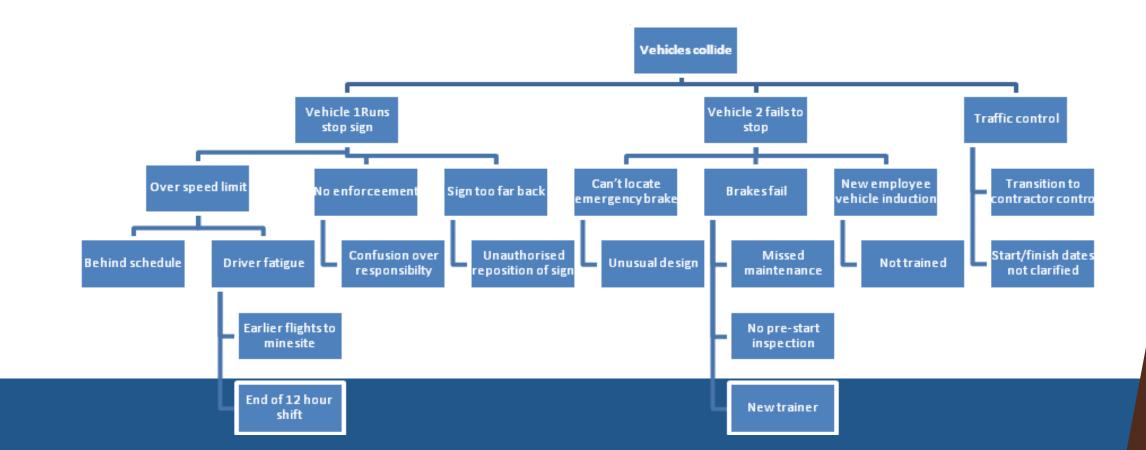
Collect, test and organise information

• Incident Timeline - RD Unplanned Movement (Operator Fell Asleep) cont



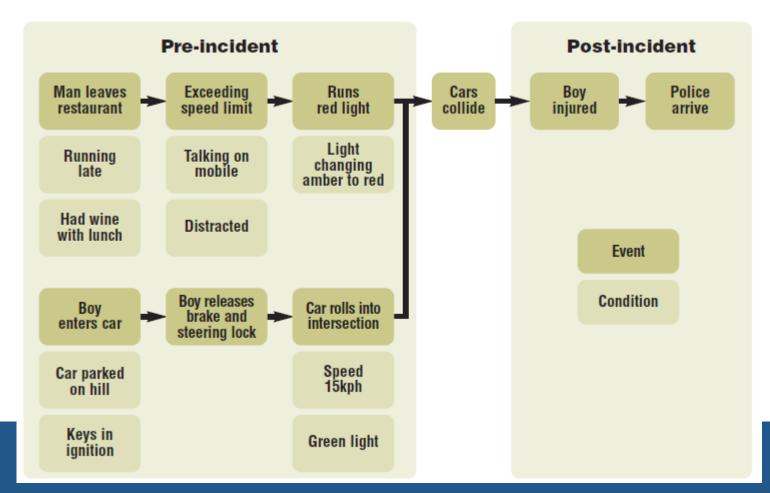
Collect, test and organise information

• Incident Fault Tree



Collect, test and organise information

• Event and conditions chart

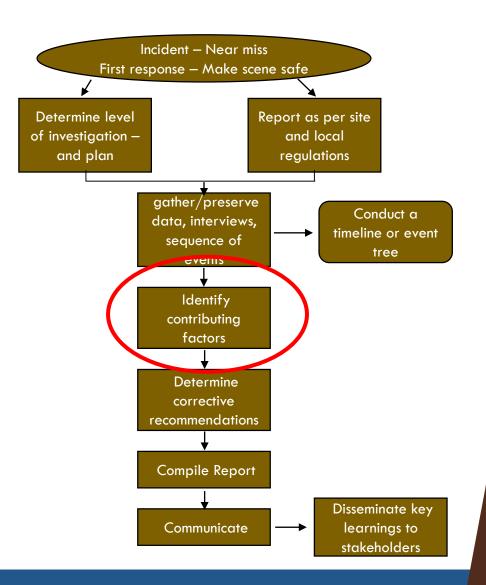


Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

26 to 28

- Access and evaluate information for validity and reliability
- Undertake further research
- Analyse the evidence to determine causes of the incident
- Draw conclusions
- Confirm findings



Access and evaluate information for validity and reliability

• It is important that the team differentiates between fact and opinion. The tables below provide guidance on fact versus opinion and objective versus subjective information.

| Fact | Opinion |
|---|---|
| A fact is the statement of a thing done or existing | An opinion/analytic information is a personal view or judgement based on what seems to be true, or an interpretation of fact. |
| e.g. Australia won the 1999 Cricket Work Cup | e.g. The 1999 Australian cricket team were as good as the Bradman Invincible. |

Access and evaluate information for validity and reliability

| Objective | Subjective |
|--|--|
| Not an interpretation – based on a factual description. | Interpretations — based on personal interpretations/biases. |
| Observable – based on what is seen or heard. | Non-observable – based on events not directly observed. |
| Reliable – two or more people independently agree on what they observed. | Unreliable – two or more people don't agree on what they observed. |
| Measurable – a number is used to describe behaviour or situation. | Non-measurable – a number isn't used. |
| Specific – based on detailed definitions of what happened. | General – based on non-detailed descriptions. |

Access and evaluate information for validity and reliability

Another useful tool is to use 'SMART' indicators

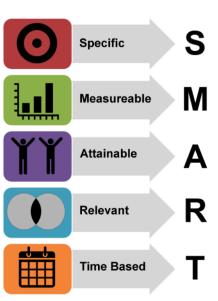
Specific in that it relates directly to what is measured

Measurable in that data is accurate, complete and it can be quantifiable for comparison

Actionable in that it is easy to understand as well as implement

Relevant in that it measures what is important

Timely in that it can be collected when needed and reflects up to date information





Undertake further research

- Whilst compiling information it may come to light that further investigation/information is required.
- This is not strange and should be treated in the same fashion as the previous information.

Note: Ensure you keep focused on the objectives of the investigation to ensure you do not go off track.

Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

29 to 35





Analyse the evidence to determine causes of the incident

- There are many analytical techniques and investigators will choose the ones they think are most useful.
- There is no system that is the best; they all have particular strengths and weaknesses.
- The following is a series of steps or tips that may be useful to the investigation team as they analyse the information:
 - Apply an applicable analysis model (Six Thinking Hats, Change Analysis and Decision Making Matrix)
 - Create links between information- use cause, effect and conditions arrows on your charts and diagrams
 - Try to fix any discrepancies early in the process; it lightens the load later when you have eliminated leads early





Analyse the evidence to determine causes of the incident

- The following is a series of steps or tips that may be useful to the investigation team as they analyse the information: cont
 - Only include relevant facts- narrow your focus
 - Exclude all irrelevant facts- they only add confusion
 - Try to avoid repeating data; even when valid, the extra elements add confusion to the process
 - Choose realistic conclusions, but continue to search for other possibilities until they can be ruled out
 - Use analysis tools to organise and reason by argument based on a consensus of probabilities. If it stands up to argument then it is likely to be valid and probable

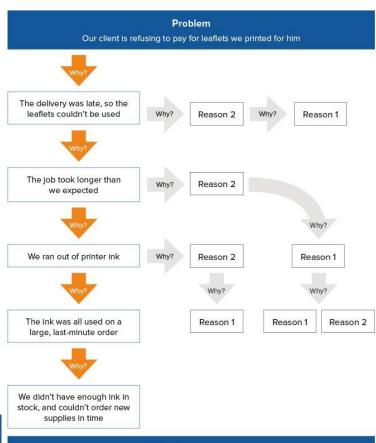
Analyse the evidence to determine causes of the incident

- The following is a series of steps that may be useful to the investigation team as they analyse the information: cont
 - Finish with a clear analysis that differentiates fact from opinion. If you are certain that the conclusions are complete and clear-cut state this. If there are areas where you are uncertain, state this and reasons why
 - If a conclusion is not completely supported by the available evidence, state this and why.
 - Any pathway that was not investigated needs to be included and reasons why.
 - Leave the analysis for a few days and review with fresh eyes



Analyse the evidence to determine causes of the incident

- 5 Why's
- You can use 5 Whys for troubleshooting, quality improvement, and problem solving, but it is most effective when used to resolve simple or moderately difficult problems.
 - Assemble a Team
 - Define the problem
 - Ask the first 'Why?"
 - As 'Why?' four more times
 - Know when to stop
 - Address the root causes
 - Monitor your measures



Counter-measure

Find an ink supplier who can deliver at short notice, so that we can continue to minimize inventory, reduce waste, and respond to customer demand.



Analyse the evidence to determine causes of the incident

- Six Thinking Hats
- Each "Thinking Hat" is a different style of thinking.
 - Blue Hat

- Process

White Hat

- Facts and data

Red Hat

- look at the problem using your intuition, feelings

Green Hat

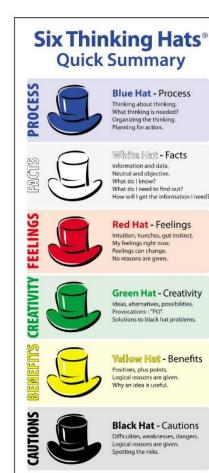
- Creativity

Yellow Hat

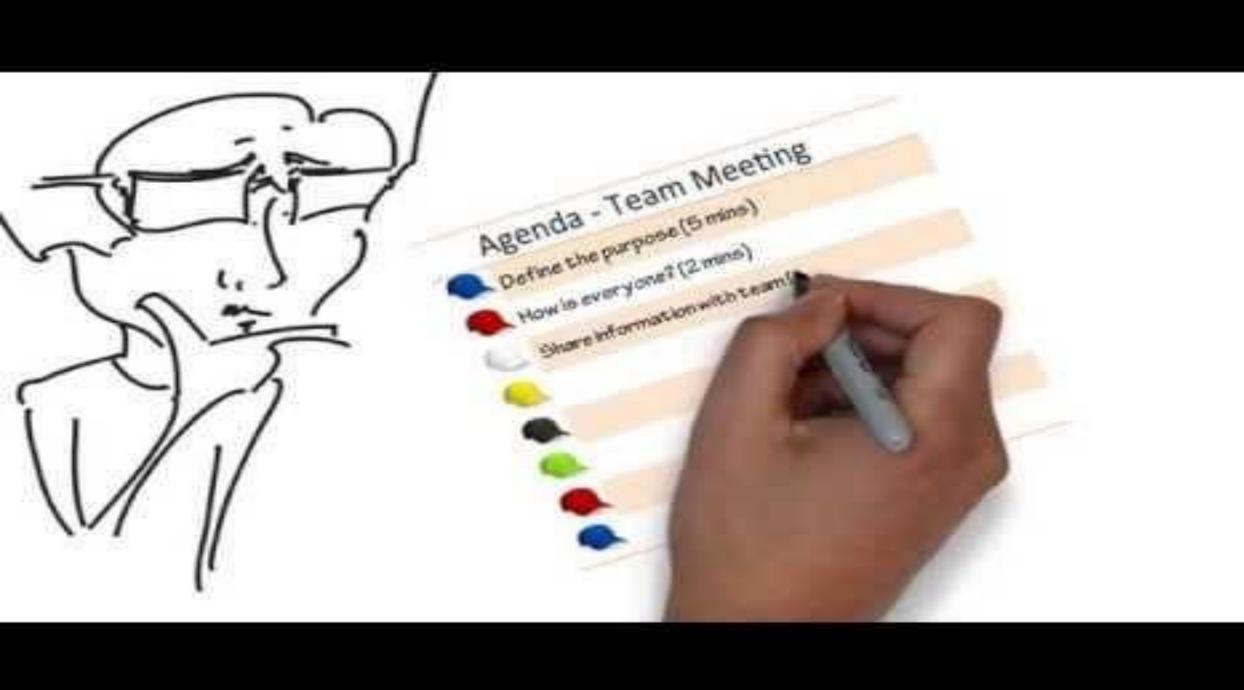
- Positive thinking, benefits

Black Hat

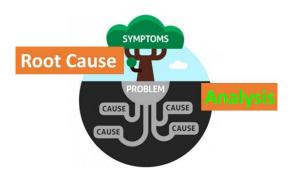
- Cautious, critical thinking



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Analyse the evidence to determine causes of the incident

- Accidents are complicated processes. It follows that causes are multiple and can be confusing. A system of classifying accident/incident causes, divides them into three categories for better understanding:
 - Basic Causes
 - Contributing Factors
 - Root Causes

REASONS 'SWISS CHEESE' MODEL





Draw conclusions

- Don't assign blame it is to continually improve our work systems to ensure a safe and healthy environment.
- Look deeper to identify causes that could lead to further accidents.
- There are some general points to remember when drawing conclusions:
 - Every error a person makes has a prior cause
 - Diverging from procedures have a prior cause
 - Reports and statements must show clear links between cause and effect
 - Failures or deficiencies must be linked to an actual duty to act
 - Avoid negative language while defining causes
 - Prioritising Accident Causes

Draw conclusions

• One process of drawing conclusions is to use a Decision Making Matrix

Investigation Topic _____ **Important Factors** What are the 'chances' this cause, will cause will contribute to an we be sure it will reduce Possible Causes Basic, contributing or root cause? accidents? accident again? Worker fatigue **Equipment** 'out to maintenance' Scheduling conflict

Confirm findings

- Compare with investigation objectives?
 - Have we followed it back as far as possible?
 - Was this condition rare, common or?
 - Is it supported by facts or was there some conjecture?
 - Any gaps in the causation chain?
 - What are the 'consequences'
 - Does it need to work in combination with other possible causes?
 - If we controlled it, might it control other causes and events as well?



Confirm findings

- When confirming investigation findings, consider:
 - Objectivity
 - Confidentiality
 - Validity
 - Accuracy



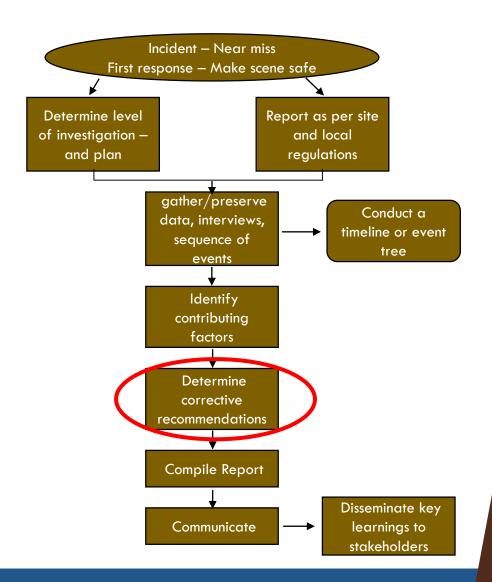
Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

36 to 38

Identify courses of action

- Frame options and articulate findings
- Options are provided in a form that meets audience requirements
- Collate courses of actions
- Confirm courses of action are implemented



Identify courses of action

Frame options and articulate findings

A good framework to review recommendations is SMARTER:

Specific in that it relates directly to what occurred

Measurable in that data is accurate, complete and it can be quantifiable for comparison

Actionable in that it is easy to understand as well as implement

Relevant in that it measures or states what is important

Timely in that it reflects up to date information and can be implemented quickly

Effective in that what it sets out to do, it accomplishes

Reviewed in that it can be tested for effectiveness in the future and changed if necessary





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Options are provided in a form that meets audience requirements

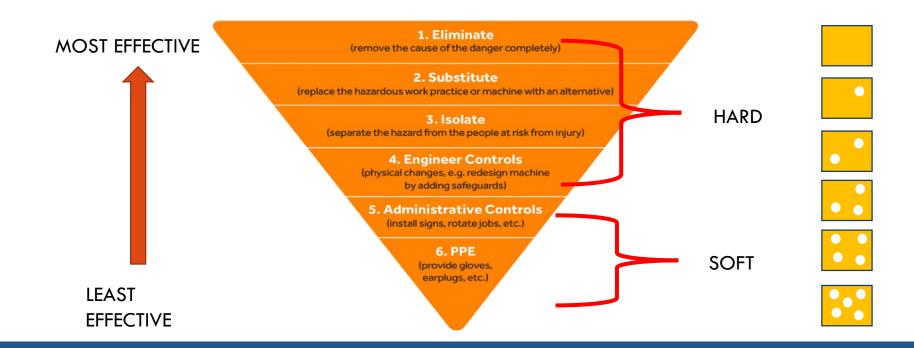
- There is no one way to deliver the information Organisations may have specific formats to follow
- While writing recommendations it is important to:
 - State recommendations that will reduce the likelihood of a factor contributing to future accidents
 - State short term corrections that may need to be implemented for safety before more effective longer term corrections are put in place
 - State possible positive and negative outcomes of recommended actions
 - Recommendation should correct 'system' deficiencies, not just a one off fix

Options are provided in a form that meets audience requirements

- The format for each recommendation may include:
 - A summary of the contributing factors causation chain with links to recommendations
 - A selection of options for correction clearly linked to the Hierarchy of Control
 - The investigation team's recommended control/s with a brief summary of reasons; use the SMARTER framework
 - Resources needed for implementation
 - Timeframe for implementation
 - Who would be responsible for corrective actions
 - Monitoring and review of corrective actions

Options are provided in a form that meets audience requirements

Use the Hierarchy of Control when developing recommendations / actions.



Collate courses of actions

| Recommendations for Corrective Action | | | | | | |
|---------------------------------------|---------------------------|-----------------------------|-----------|-----------|----------------|-----------------------|
| Investigation Subject | | | | | | |
| Deficiencies | Options for Correction | Recommended Correction/s | Resources | Timeframe | Who Implements | Monitor and Review |
| | | | | | | |
| | | | | | | |

Confirm courses of action are implemented

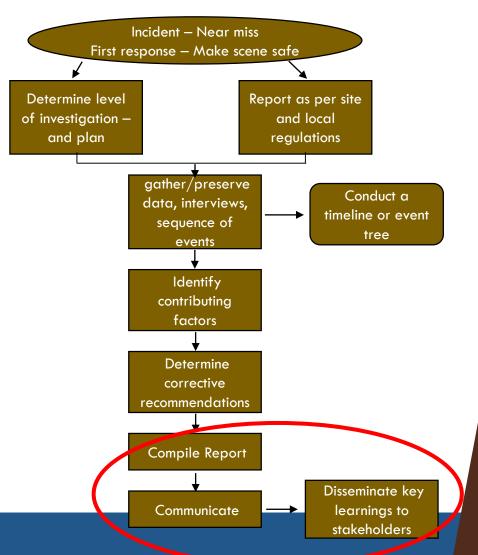
- This is not always part of the investigations teams roles or responsibilities
- Follow your organisations or site procedures, this may include:
 - Adding to management/tracking systems such as 'Site Safe'
 - Post investigation review to ensure are appropriate
 - Follow on risk assessments for the updating of polices and procedures

Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

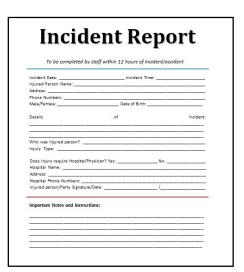
39 to 44

- Prepare investigation reports
- Present reports
- Communicate outcomes



Prepare investigation reports

- Organisational process, severity of the incident and audience will determine the report format
- As a minimum Incident reports should include:
 - Incident
 - Circumstances
 - Findings
 - Conclusions
 - Key learnings, recommendations and actions
 - Outcomes



Present reports

- The following should be considered when preparing an investigation report:
 - Factual, concise and conclusive
 - Interpretations based on fact
 - Causes should be based on the investigation method used
 - Clearly identify contributing factors
 - Readable as a stand alone document
 - Strict document control procedures followed
 - Reference all relevant documents and associated records
- Visual representations is always a good idea for the quick interpretation of information
 - Photo's, graphs, timeline's etc

Communicate outcomes

- Organisational procedures and severity will dictate the audience for communication
- It may be required to have a close out meeting where preliminary findings are shared with the formal report to follow. This allows the organisation to review, comment and commence corrective actions prior to final report.
- Some key areas to be considered for communication are:
 - Those involved in the incident
 - Work teams
 - Management (Supervisors, Managers, CEO, Chairmen etc)
 - Safety Reps
 - Wider industry preforming similar tasks

Communicate outcomes

Legal review

Depending on organisational procedures and severity it is advisable that an inspection and revision
of the investigative report, depending on circumstances, should be completed by the legal
department to ensure it complies with all legislative requirements, industry standards and general
duty of care.

Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

45 to 50

QUESTIONS

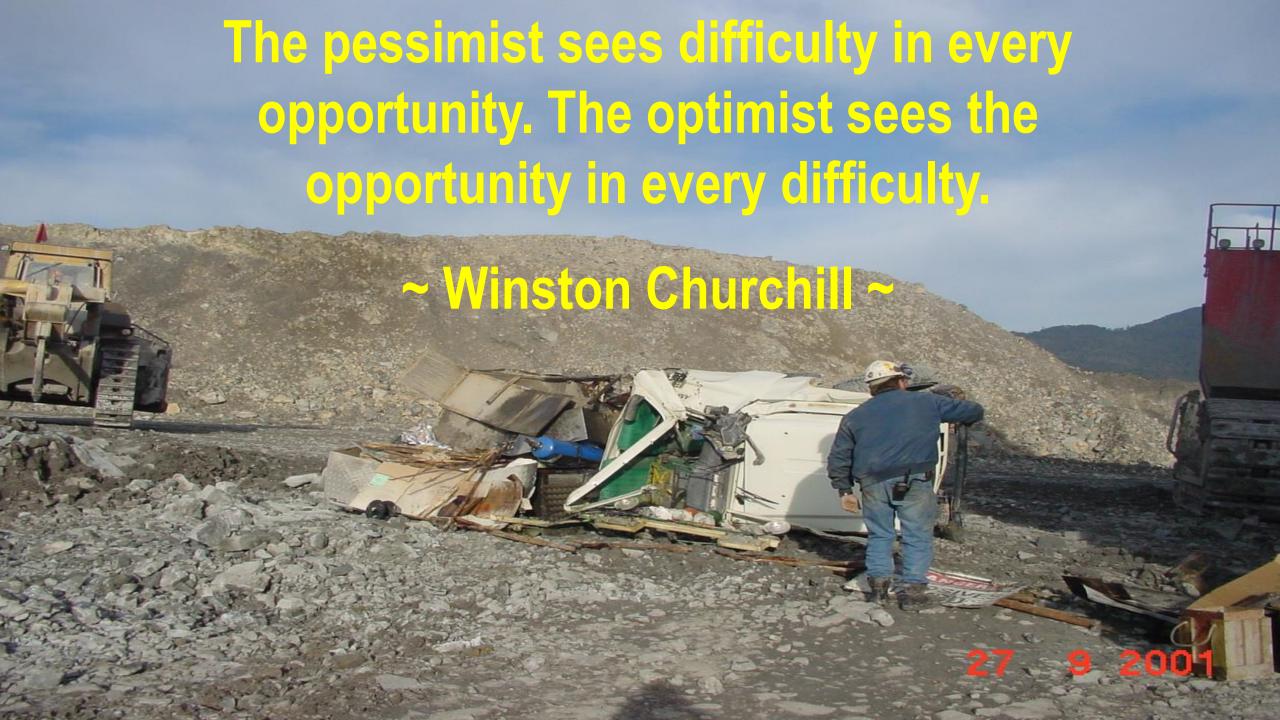


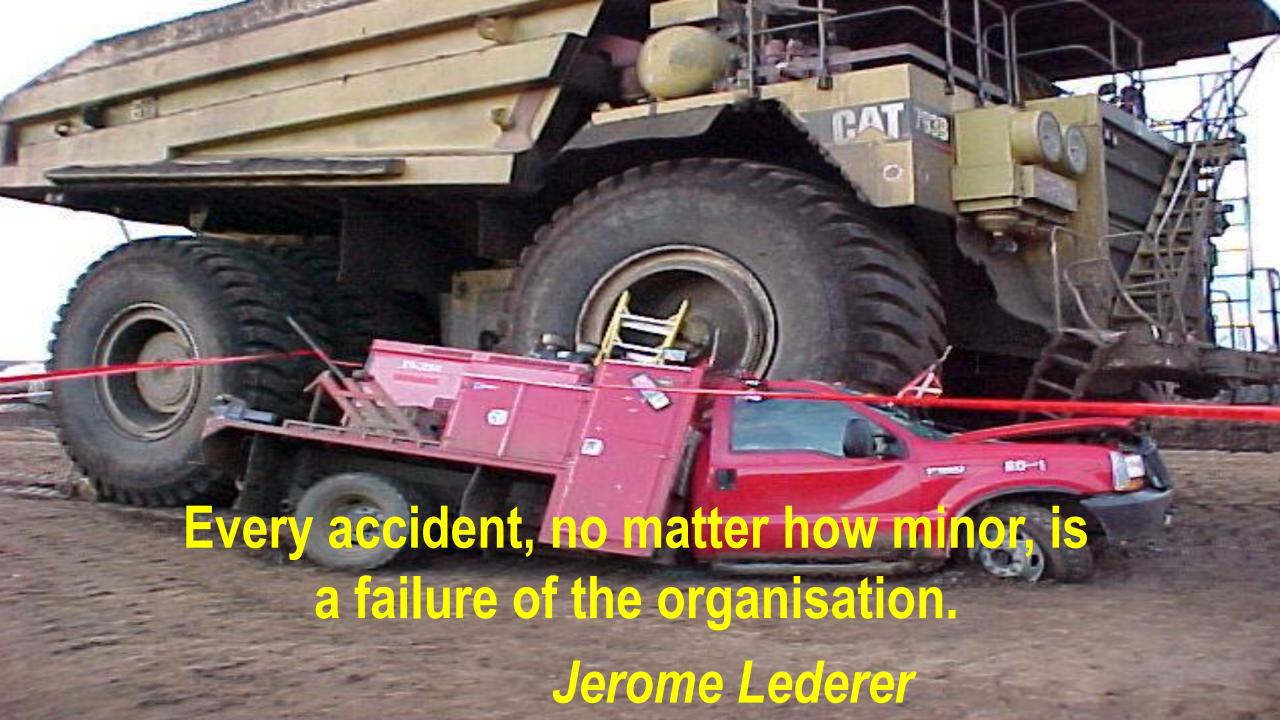
















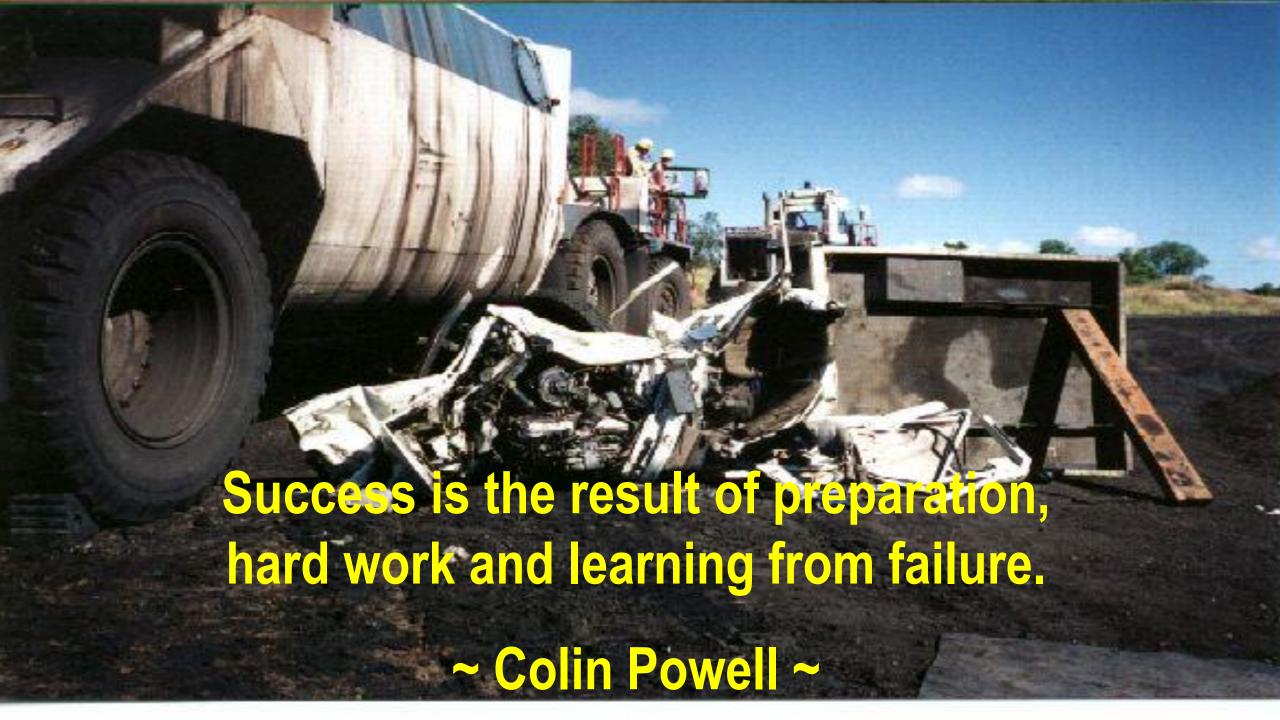














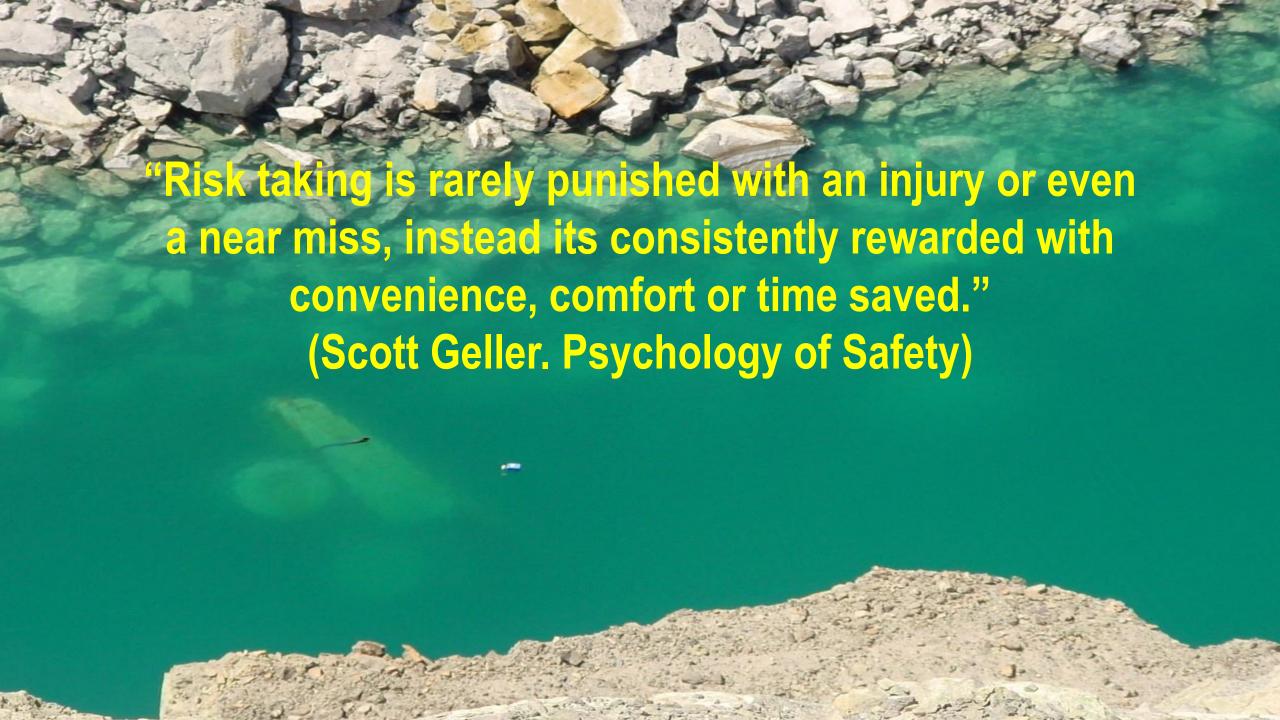






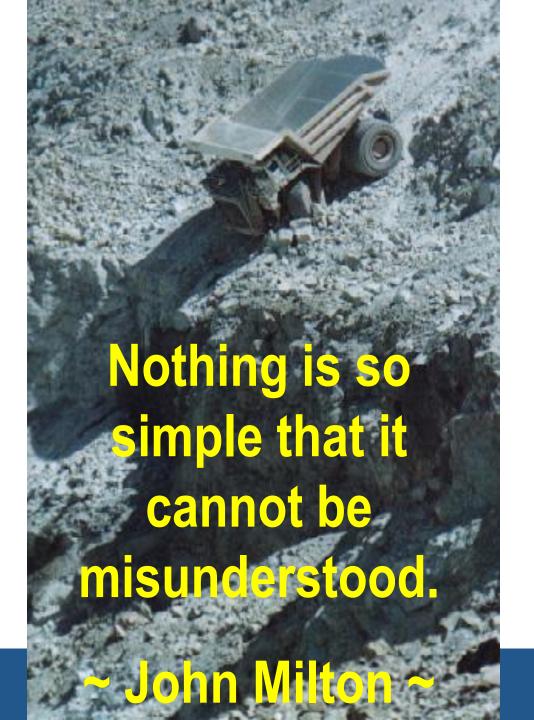












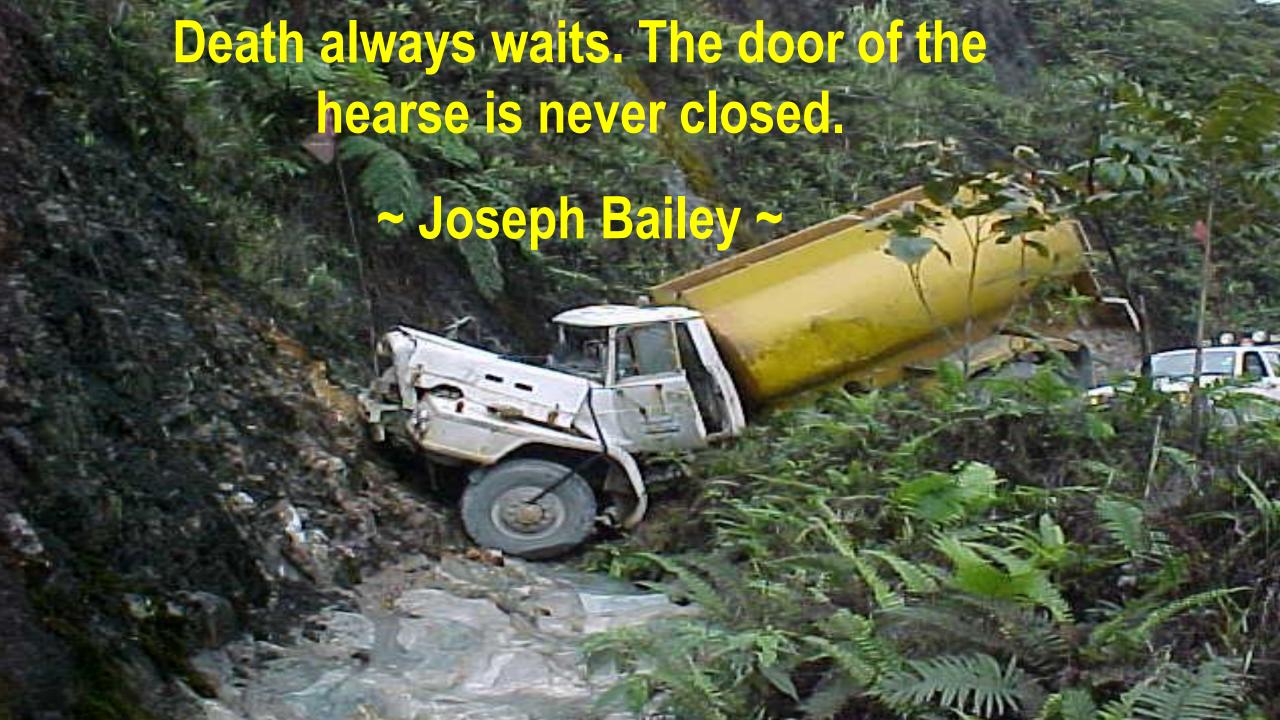






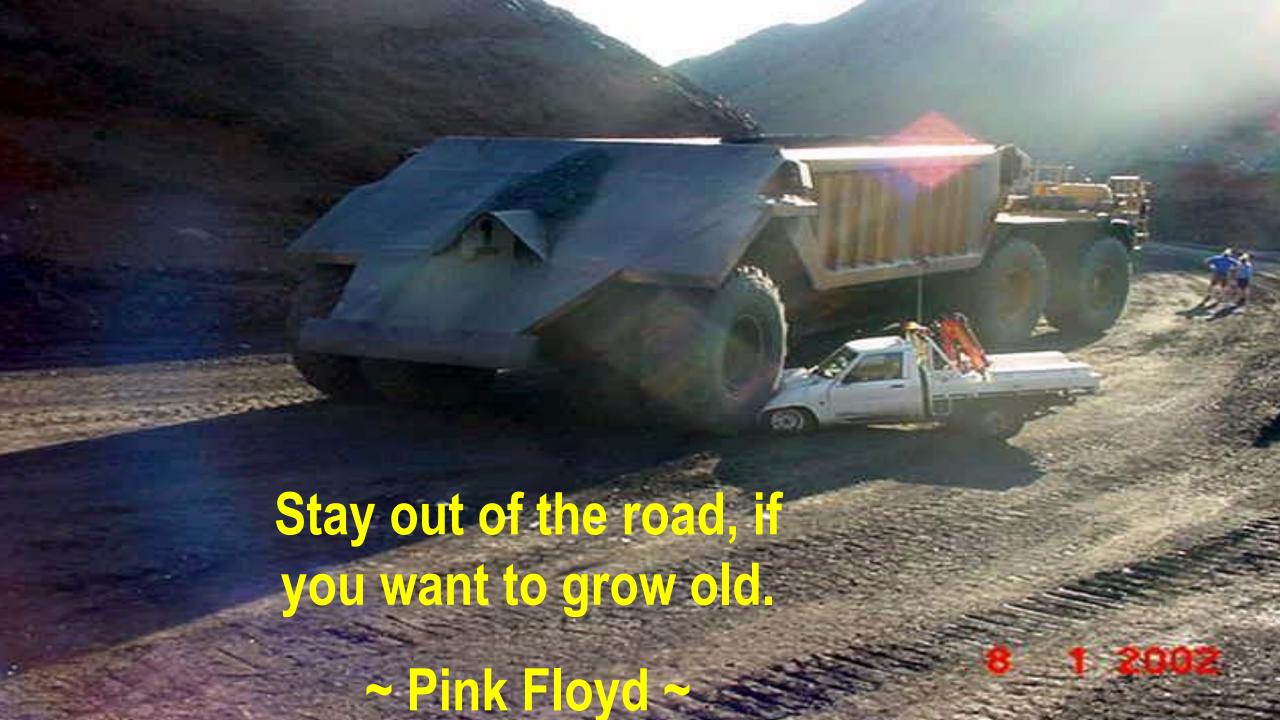








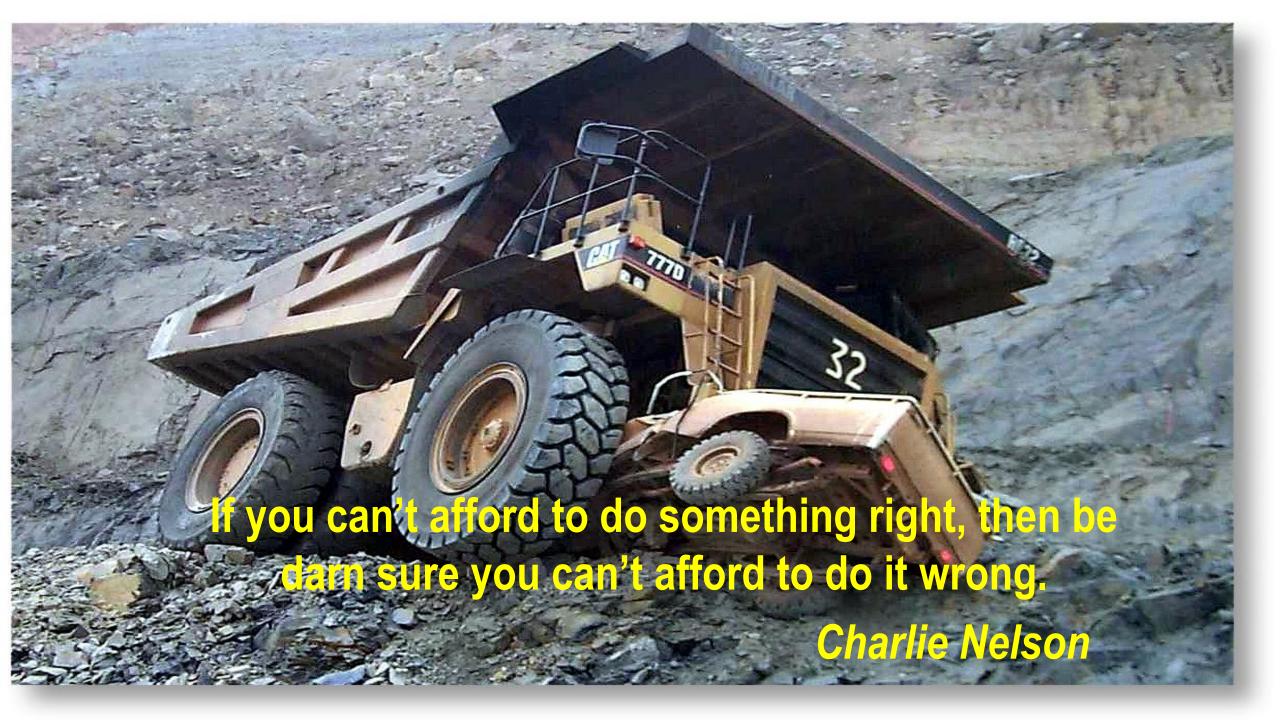


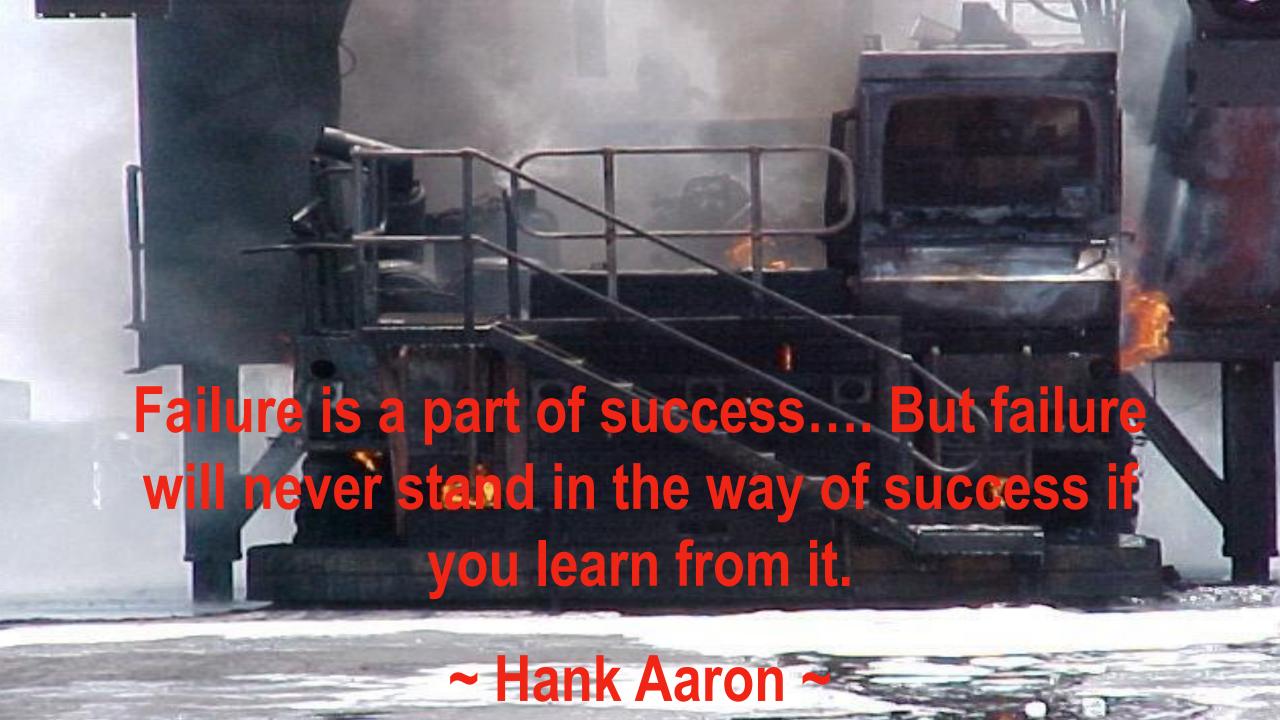




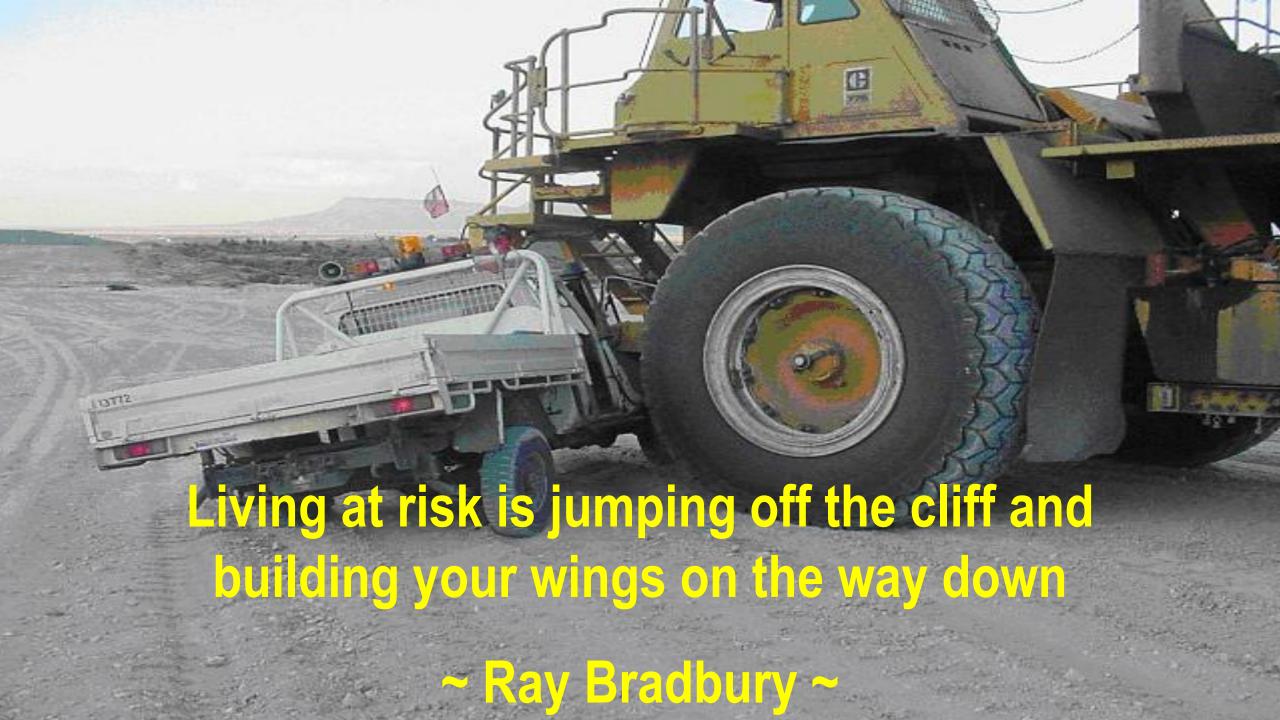










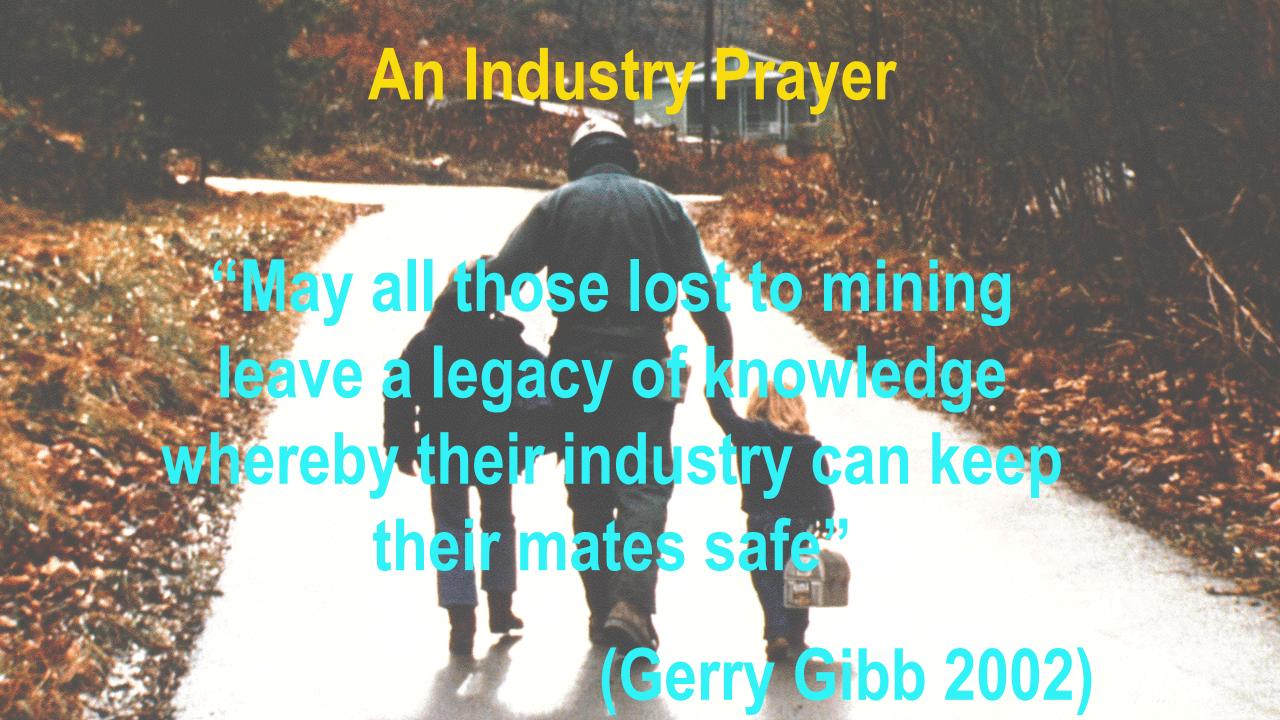












Learner Assessment Record

COMPLETE ASSESSMENT QUESTIONS

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