

Safety & Health Related Record Keeping

WHY MAINTAIN OCCUPATIONAL INJURY AND ILLNESS RECORDS?

It is important to maintain records related to your overall safety and health activities for several reasons. Records confirm your intentions to safeguard your employees from injuries and illness and also help you comply with applicable rules and regulations, such as those found within Fed-OSHA or State OSHA programs.

Tracking information in these records can enhance your safety program by identifying potential injury and illness trends that result from a specific hazard or work practice. The information can assist in making recommendations that will improve operations by changing a process or work procedure. Without a formal process of identifying both, hazards and unsafe work procedures may go left un-checked, and additional injuries and illnesses may occur.

The process of summarizing injury and illness –related information also serves as a tool to advise your workforce “how things are going”, and provides an opportunity to set goals for improvement. For example if the Injury and Illness Log (OSHA 300) and Injury and Illness Report (OSHA 301) indicate that the frequency of injuries and illnesses is increasing, you can identify any specific trends and implement a plan focused on eliminating or controlling the related issues and show a reduction in the next reporting period. Remember that the Summary of Injury and Illness (OSHA 301a) should be posted annually from Feb. 1 to April 30.

In either case, maintaining records related to injuries, illnesses and safety activities assist you in complying

with regulatory mandate. It validates the fact that you are a caring and concerned employee and that you are interested in safeguarding your company's assets and reputation should you ever be engaged in a formal proceeding by a regulatory agency.

TYPES OF RECORDS TO KEEP

It is equally important to keep records of your program – related activities as well as those related to injuries or illnesses. (Both are highlighted in the next section, below.)

To some extent, these aspects of consideration are encompassed within the *“Job Safety and Health: It's the Law”* poster. Contrary to what many employers think, however, this poster does not include everything that you have to post or retain from a records perspective. You should become familiar with all of the records you must retain as well as any posting requirements that fall within the occupational safety and health arena.

BASIC REQUIREMENTS

The basic requirements apply to organizations that must maintain records.

Basic record keeping requirements can be focused within two areas - those related to program aspects and those related to injuries and illnesses that have occurred within your operations. Let's look at both as to the type of record and the recommended or mandate length of retention.

Program Aspects:	Maintain for:
• Records of unsafe work conditions and practices	5 years
• Records of inspections	"
• Records of hazard assessments	"
• Incident investigation reports	"
• Record of corrective actions	"
• Records of training	"

Injury and Illness-Related	Maintain for:
• Log of Work-related Injuries and Illnesses (OSHA Form 300)	5 years
• Summary of Work-related Injuries and Illnesses (OSHA Form 300A)	"
• Incident Investigation Reports (OSHA Form 301 or substantially similar)	"
• Workers' Compensation Notice of Injury	"
• First Aid reports for injuries causing loss of work time	"
• Chemical safety and exposure records	Duration of Employment plus 30 years

example there are exceptions for recordkeeping and retention of medical records for companies with 10 or fewer employees and for persons employed less than one year. In addition, record keeping differences exist for certain types of businesses, such as those categorized as low hazard.

The 300 Log and additional forms can be found in many places, but a quick link is:

<http://www.osha.gov/recordkeeping/new-osh300form1-1-04.pdf>

The Federal Department of Labor maintains a website focused on record keeping and related laws and can be found at:

<http://www.dol.gov/compliance/guide/osha.htm>

Most state OSHA programs also have websites that provide similar information.

For additional information or assistance, please contact your Safety and Consultant.

We strongly suggest that you consistently maintain your records and not wait until the end of the year to compile the records or until OSHA or a State OSHA program asks you to review them.

WHERE TO GO FOR HELP

There are a number of resources available to you. The Fed-OSHA and/or State OSHA websites and related resources; they often provide a great deal of information and direction on the types of records that must be maintained and retained. In addition, these sites are excellent for helping determine whether there are modifications and exceptions to recordkeeping requirements that pertain to your operation. For

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