## Injury / Illness Recordkeeping

1. **Purpose**

The purpose of this procedure is to provide a systematic approach to investigating and reporting incidents involving personal injury, spills, property damage, near misses, fires, explosions, motor vehicle crashes, security incident, etc.

1. **Roles and Responsibility**

* Employees have a responsibility to immediately report all incidents, near misses and unsafe acts that could result in injury to their immediate supervisor or manager.
* The supervisor shall notify the company safety coordinator immediately following an incident.
* The safety coordinator will investigate each incident using the company’s incident report form.
* The safety coordinator is responsible for contacting the relevant enforcement authority.
* The safety coordinator shall ensure that incidents are recorded on the OSHA 300 and 300a logs.

1. **Injury Management**

Upon notification of an injury beyond minor or first aid injury, the employee should be sent to the facility providing the best level of service.

Whenever possible, the employee’s supervisor or manager should accompany them to the clinic. This may also be a designated alternate who is familiar with the medical service provider and this procedure.

The medical service provider should be informed that restricted duty work is often available and the goal of the Company is that the injured employee returns to work as soon as it is safe to do so.

1. **Reporting Procedure**

An incident report shall be completed for all incidents including first aid, medical treatment, lost time, fatalities, near miss, fire and explosion, vehicle accident, theft, and equipment damage. Individual responsibilities for reporting and investigation shall be pre-determined and assigned prior to incidents.

Written incident reports shall be prepared and include an incident report form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, investigation board member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

Incidents involving a fatality or the hospitalization of three or more people must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the owner client and immediate supervisor as soon as possible or in a timely manner (within 24 hours of incident). A copy of the incident report shall be forwarded to the EHS department within 24 hours.

1. **Investigation Procedure**

Incident investigations will be held with the purpose of determining facts to provide important causes and lessons learned for preventing recurrence.

While all incidents shall be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method. All major incidents that cause or have the potential to cause fatalities, hospitalizations, and significant property damage shall undergo a root cause analysis. Investigations should begin immediately following the incident.

The following guidelines shall be used for all investigations:

* Proper equipment such as pens/paper, tape measures, rulers, cameras, audio recorder, PPE, marking devices, equipment manuals, etc. shall be provided to assist in conducting the investigation.
* Witness interviews and statements shall be collected as soon as possible following an incident.
* Witness interviews shall be conducted by trained interviewers in a private location. Interviews shall be conducted as a fact finding and not a fault finding mission. Only open-ended questions should be asked. The investigation may require follow-up witness interviews.
* Inspect the site immediately following the incident to identify any evidence. This may include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions.
* Evidence such as people, positions of equipment, parts, and papers shall be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.
* After all facts are gathered and analyzed causative and contributing factors of the incident should be identified.

1. **Corrective Actions**

Lessons learned from incident investigations shall be documented and communicated to all employees. Lessons learned shall result in the development and tracking of corrective actions and shall include a review of all similar operations. Recommendations for corrective actions should be based on factors that have contributed to or have caused the incident.

Corrective actions associated with lessons learned should be evaluated for impact and budgetary concerns, prioritized, and tracked to completion. Implementation of detailed corrective action may require multiple milestones. After final completion of any actions, the appropriate organization should verify that the original problems were appropriately addressed.

1. **Training**

Personnel who conduct or participate in incident investigations shall be trained in their roles and responsibilities for incident response, incident awareness and incident investigation techniques. Training shall be provided initially and annually thereafter.

1. **Recordkeeping**

Records shall be retained for fatalities, injuries, and illnesses that is work-related, a new case and meets one or more of the general recording criteria.

Each recordable injury or illness shall be entered on an OSHA 300 Log, 300A Summary and 301 Incident Report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

The 300A Summary shall be signed by a company executive to certify that the log has been examined and that the summary is correct and complete to the best of their knowledge.

A copy of the annual summary must be posted in each establishment in a conspicuous place or places where notices to employees are customarily posted. Ensure that the posted annual summary is not altered, defaced or covered by other material.

The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.

The OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 Incident Report forms must be retained for five (5) years following the end of the calendar year that these records cover.