

## (3) Recordkeeping

### (3.1) General Recordkeeping and Requirements

Maintaining accurate and comprehensive safety and health records is not only a legal requirement under OSHA's Recordkeeping regulation (29 CFR Part 1904) but also a crucial part of [Your Company Name]'s commitment to a safe and healthy workplace. These records help us track workplace injuries and illnesses, identify potential hazards, and monitor the effectiveness of our safety programs.

- **What Records Must Be Kept**

We maintain the following records as per OSHA's requirements:

- **OSHA 300 Log:** This log is used to record all work-related injuries and illnesses that meet OSHA's recording criteria. According to OSHA's recordkeeping regulation (29 CFR Part 1904), all employers with more than 10 employees at any time during the last calendar year are required to maintain an OSHA 300 Log unless they qualify as a low-risk industry exempted by OSHA. Low-risk industries include certain retail businesses, service industries, finance industries, and real estate sectors, among others. A full list of exempted industries can be found on the OSHA website.
- **OSHA 301 Incident Report Form:** This form provides more detailed information about each individual recordable injury or illness. An equivalent form with the same information can also be used. The OSHA 301 form (Injury and Illness Incident Report) is generally required to be completed by employers with more than 10 employees during the last calendar year, unless they belong to certain low-risk industries which are partially exempt from these recordkeeping requirements. The partially exempt industries are listed by OSHA and are primarily in the retail, service, finance, insurance, or real estate sectors.
- **OSHA 300A Summary Form:** This is a summary of the total number of job-related injuries and illnesses that occurred during the previous year. The OSHA 300A form, or the Summary of Work-Related Injuries and Illnesses, is typically maintained by employers who are required to keep records of serious work-related injuries and illnesses. This generally includes employers with more than 10 employees during the last calendar year, unless they belong to a low-risk industry that is partially exempt from OSHA's recordkeeping requirements.

- **Who is Responsible for Recordkeeping**

In the context of OSHA regulations and workplace safety, recordkeeping responsibilities are typically assigned to a designated individual or team within the company, often in a safety, human resources, or management role. This person or team is responsible for maintaining accurate and up-to-date records related to workplace safety, including the OSHA 300 Log, OSHA 301 Incident Report Forms, and OSHA 300A Summary Forms, among other required records.

- **Accessibility of Records**

All employees, former employees, and their representatives have the right to review the OSHA 300 Log. A copy of the OSHA 300A Summary Form is posted in a visible location from February 1 to April 30 each year.

- **Record Retention**

In compliance with OSHA regulations, we maintain these records for at least five years following the end of the calendar year that these records cover.

- **Reporting Severe Injuries**

Any work-related fatality must be reported to OSHA within 8 hours, and any inpatient hospitalization, amputation, or eye loss must be reported within 24 hours.

Remember, accurate recordkeeping is vital for our commitment to a safe and healthy workplace. Any questions regarding these processes can be directed to your supervisor or the Safety Manager.

### **(3.2) Medical and Exposure Records**

- **Medical Records**

Medical records related to an employee's work should be preserved. These records can include but are not limited to:

- Medical histories
- Medical examination results (e.g., physical examinations, biological monitoring)
- Medical opinions, diagnoses, progress notes, and recommendations
- Descriptions of treatments and prescriptions
- First aid records
- Employee medical complaints

These records must be kept for the duration of employment plus 30 years, according to OSHA's standard.

- **Exposure Records**

Exposure records are those that show an employee's exposure to toxic substances or harmful physical agents. They can include:

- Environmental (workplace) monitoring or measuring.

- Biological monitoring results which directly assess the absorption of a substance or agent by the body
- Safety Data Sheets (SDS) or other records that reveal where and when used and the quantity of hazardous materials involved.
- Any other records that may be required by specific OSHA standards.

Like medical records, exposure records must also be maintained for at least 30 years.

- **Analyses Using Exposure or Medical Records**

Analyses refer to any assessments, studies, or compilations of data that are derived directly from individual employee exposure or medical records. These must be preserved for at least 30 years.