Quiz: Recordkeeping/Reporting

QUESTION

What are some of the reasons why incidents of property damage, near/misses/close calls spills go unreported?

A. Fear discipline, only first aid was required, no property damage or injury.
B. Do not want to admit mistakes, minor injuries do not need reporting, do not want to admit mistakes.
C. Repercussions from incident, do not want to admit mistakes, supervisor do not want to bother.
D. Repercussions from accident, fear of discipline, do not want to admit mistakes.

ANSWER

D. Repercussions from accident, fear of discipline, do not want to admit mistakes.

WHY IS IT RIGHT

Many employers with more than 10 employees are required to keep a record of serious work-related injuries and illnesses. (Certain low-risk industries are exempted.) Minor injuries requiring first aid only do not need to be recorded.

This information helps employers, workers and OSHA evaluate the safety of a workplace, understand industry hazards, and implement worker protections to reduce and eliminate hazards –preventing future workplace injuries and illnesses.

Maintaining and Posting Records

The records must be maintained at the worksite for at least five years. Each February through April, employers must post a summary of the injuries and illnesses recorded the previous year. Also, if requested, copies of the records must be provided to current and former employees, or their representatives.

Updated Electronic Submission of Records

The Injury Tracking Application (ITA) is accessible from the ITA launch page, where you can provide the Agency your 2017 OSHA Form 300A information. The date by which **certain** employers are required to submit to OSHA the information from their completed 2017 Form 300A is July 1, 2018.

Severe Injury Reporting

Employers must report any worker fatality within 8 hours and any amputation, loss of an eye, or hospitalization of a worker within 24 hours.

Basic recording requirement

Every employer is required to keep records of work-related fatalities, injuries and illnesses that meet one or more of the general recording criteria, including:

- Death,
- Days away from work,
- Restricted work,
- Transfer to another job,
- Medical treatment beyond first aid,
- Loss of consciousness, or
- A significant injury/illness diagnosed by a physician or other licensed health care professional.

Recordkeeping: It's More Than Just Compliance

There are many good reasons for keeping thorough and up-to-date records of accidents and injuries that occur on the job. The primary reason, of course, is compliance with the law. But a thorough reporting and recordkeeping system can also provide you with valuable information concerning accident patterns and prevention. Being able to observe injury and illness trends in the workplace over a span of time helps identify shortfalls or omissions in training, and allows an opportunity to strengthen the overall safety of the workplace.

When to Record

The Occupational Safety and Health Administration (OSHA) requires most employers to maintain OSHA records for all "OSHA recordable" injuries and illnesses. Employers meeting the requirements for a small-employer exemption or who are engaged in what are known as a "partially exempt industry" may be exempt from maintaining these records. For employers who do not meet those exemptions, injuries and illnesses must be recorded if they:

- Involve an employee.
- Are work-related.
- Are a new case, meaning that the employee has not previously experienced a recorded injury or illness of the same type that affects the same part of the body or that the employee previously experienced such an injury or illness, but completely recovered?
- Result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.
- Are a significant work-related injury or illness that is diagnosed by a physician or other licensed health care professional.
- Result from a needle stick injury or a cut from a sharp object that is contaminated with another person's blood or other potentially infectious material.
- Result in the medical removal of an employee under the medical surveillance requirements of an OSHA standard.
- Involve occupational hearing loss.
- Involve an occupational exposure to tuberculosis and subsequent development of the infection.

Organizations regulated by OSHA are required to maintain a log (OSHA Form 300) and an annual summary (OSHA Form 300A) of occupational injuries and illnesses, as well as a supplementary record of each recordable injury or illness (OSHA Form 301). These records must be kept up to date and must be made available to OSHA and the National Institute for Occupational Safety and Health (NIOSH) on request. You must retain them on file for at least five

years.

State laws often also require you to keep safety and health records and to file reports. Workers' compensation laws, for example, may require accident reports.

Even if an employer is not required to maintain records, it is still a good idea to do so.

Importance of Reporting All Injuries Safety Talk

We are all trained to report any near misses, injuries, or incidents to a supervisor or safety representative. Often times however many of these incidents, especially first aid type injuries, are not reported. Injuries are not reported because of many different reasons, but it is important to understand why all of them need to be.

Reasons Why Incidents Go Unreported

There are many reasons why incidents such as property damage, near misses, spills, and injuries go unreported. A major reason is often the individual's pride. Most people do not want to admit their mistakes to others, especially at work. They may also fear the outcome from sharing what occurred with a supervisor. This fear may come from being afraid of being disciplined, what others think, or the repercussions from the incident. Another reason a person may not want to report an incident is because of the paperwork or energy involved in doing so. There are many other reasons why an individual may not want to share what happened to them, but this should never be the case.

Why it is Important to Report Injuries

There are many reasons why you should report any type of injury, no matter the severity. The most important reason is to make sure the situation or hazard is made safe for not only yourself, but the others at the worksite. Another reason is to further share your experience or the lessons learned from the incident with others to prevent it from occurring in the future.

With injuries, even just minor ones, it is important to get them looked at by a supervisor or safety representative. While many injuries, such as a small cut or an insect sting, may not seem like a big deal they can turn into one. A quick example: You are bit by some type of insect on a Friday afternoon at work, but decide not to tell anyone for various reasons. You leave work and are home for a few hours when you notice that the bite area is beginning to swell up. Along with the swelling, you notice that you have hives and are having trouble breathing. You realize it is a serious **allergic reaction** and need medical attention. You tell the doctor you were bit or stung at work and the treatment he gives you ends up being considered "medical attention". Because it happened at work and you needed medical attention beyond first aid it is now an OSHA recordable injury. In this situation there are a few problems since the injury was not reported to someone at work immediately.

1. There is no record or witness to it happening at work which could raise concern by the employer whether or not the injury occurred at work. This may end up in a drawn-out dispute since there has been many people in the past who have faked or had injuries off the job, but stated it occurred at work in an attempt for it to be paid through worker's compensation.
2. If the injury was reported immediately someone may have been able to recognize that it may develop into an allergic reaction. There could have been **options for first aid instead of medical treatment**to treat the issue before it worsened which would have saved you a trip to the hospital and the company an OSHA recordable.

WHY IS EVERYTHING ELSE WRONG

Accident Reporting and Prevention

In addition to complying with the law, a thorough reporting and recordkeeping system can also help you prevent future accidents. For example, studying these records can reveal areas in which accidents are on the increase, safety procedures that have brought the best results, and even new approaches to accident prevention.

Above all, the process of conducting an accident investigation and filling out a written accident report focuses attention on what has occurred, thus forcing your safety management team to consider what might have been done (or could be done) to avoid the incident.

Most accident reports focus on uncovering and recording the vital facts and circumstances surrounding an accident as soon as possible after it has occurred. These **"key facts"** usually include:

- Nature of the injury.
- Part of the body injured or affected by the injury.
- Source of the injury: the object, substance or bodily motion that produced the injury.
- Type of accident or manner in which the person was injured.
- Hazardous condition or circumstances surrounding the accident.
- Agency of the accident: the object, substance, or part of the premises in which the hazardous condition existed.
- Unsafe act that caused or permitted the accident to occur.

These items not only enable supervisors and safety committees to fill out the required report forms, but also help your organization evaluate the progress of your safety or accident-prevention program. If additional safety training or changes in procedures and equipment are needed, the investigation and reporting process usually makes it clear exactly what should be done.

Of course, in order to report or document workplace injuries and illnesses, the employer needs to be aware when they occur. Minor injuries often go unreported by employees for various reasons, such as embarrassment or fear of discipline.

Setting Recordkeeping Policy

Without an effective policy, your accident reporting procedures might fail to meet requirements, and be much less effective in identifying trends or training needs. Your policy must be understandable, consistently applied and enforced in order to be

effective.

The following elements are critical to an effective accident reporting policy:

Purpose. Stress not only legal compliance but also the value of reports in preventing future accidents.

Definition of "accident." Be specific so that those responsible for reporting know exactly what types of accidents must be reported. Encourage the reporting of "near misses" as well, since such incidents are often the precursor to more serious accidents and injuries.

Reporting procedures. Include a brief summary of the information that should be reported (who, what, when, where, how, why), where forms can be obtained, how soon the report must be completed, and other relevant requirements. Consider "short form" methods for reporting safety concerns or near misses that result in no damage or injury, and would not otherwise require the completion of a more formal report.

Drug testing. If your drug-testing policy requires tests after certain accidents, your accident forms and policies should be coordinated with your drug-testing policy.

Documentation. Attach copies of accident report forms to the policy statement and describe any special certification required.

Responsibilities. Stress the importance of the supervisor's role in reporting accidents, getting medical help for injured employees, filling out report forms, etc. If you have a safety committee, talk about its role in accident reporting and investigation.

Confidentiality. Make sure your policy sets out confidentiality requirements and procedures for employee medical information. Keep accident reports separate from personnel files to protect confidential information. In order to foster employees' willingness to report minor injuries, accidents or near misses, it is very important that confidentiality of witness reports be

protected as well. Anonymous reporting might be considered, but understand that follow-ups would be difficult, if not impossible, should insufficient information be provided.

Workers' compensation. Accident reports are often required for workers' compensation insurance. These forms should also be completed when accidents are reported.

Potential litigation. Be sure to also cover the manner in which the report should be maintained, distributed, and written if there is a potential for litigation. You want to avoid a situation in which an accident report admits liability and is used in future litigation against you. Include only known facts, and avoid inserting opinion, hearsay or conjecture.

Record keeping procedures

It is important to keep records, not only for your own use and reference but also because in some cases you are required by law to keep records for a certain amount of time.

Records you may keep include:

- attendance list
- feedback forms
- a copy of your presentation
- copies of all handouts
- self evaluation
- contacts list of other stakeholders
- display set-up
- list of where all the resources came from
- cost effectiveness of presentation / display
- referrals made

Records you will need to keep (check laws governing how long each item needs to be securely stored):

- hazard reports
- injury reports
- incident reports
- formal assessment details

- consent forms

Recordkeeping and Reporting

Every employer covered by the Fair Labor Standards Act (FLSA) must keep certain records for each covered, nonexempt worker. There is no required form for the records, but the records must include accurate information about the employee and data about the hours worked and the wages earned. The following is a listing of the basic records that an employer must maintain:

- Employee's full name and social security number.
- Address, including zip code.
- Birth date, if younger than 19.
- Sex and occupation.
- Time and day of week when employee's workweek begins. Hours worked each day and total hours worked each workweek.
- Basis on which employee's wages are paid.
- Regular hourly pay rate.
- Total daily or weekly straight-time earnings.
- Total overtime earnings for the workweek.
- All additions to or deductions from the employee's wages.
- Total wages paid each pay period.
- Date of payment and the pay period covered by the payment.

The Bottom Line

There is a lot more to recordkeeping and reporting of accidents than simply satisfying OSHA regulations. The reports serve to protect both the company and the employees when used as a tool for prevention and training. The information obtained is useful for follow-up training or the regular updating of safety procedures and policy. Maintaining an understandable, coherent reporting system that is used to enhance safety in the workplace can increase employee confidence that their safety matters to their leadership. This, in turn, fosters a greater buy-in and strong safety culture.

Summary

All injuries need to be reported, no matter how small. Not only

does it protect you, but it also protects the company as a whole by possibly preventing a first aid injury developing into an OSHA recordable. You never know when something that seems minor in nature will develop into something more serious. There are also always lessons that can be learned, even from just minor injuries, to prevent others from occurring in the future.