

TOOL: Model Employee Illness/Injury Reporting Policy

The OSHA Recordkeeping Standard requires you to record and potentially report work-related illnesses and injuries. Reporting of illnesses and injuries is also crucial to investigating, identifying and correcting problems that can lead to further incidents and OSHA violations. So, it's crucial to establish a policy and procedure for workers to report workplace injuries and illnesses. You can adapt this Model Policy to ensure prompt and proper reporting of workplace injuries and illnesses.

EMPLOYEE INCIDENT & INJURY REPORTING POLICY

1.0 Purpose

It is the policy of XYZ Laboratories (XYZ Labs) that all incidents that result in either personal injury or illness, and or damage to XYZ Labs property be properly reported and investigated. This operating procedure establishes a systematic process to ensure that incidents are properly reported in a timely manner, that all causes (direct and contributory) are thoroughly identified and that the appropriate corrective actions are taken.

2.0 Scope

This operating procedure applies to the reporting and investigation of all incidents that result in:

- A work-related injury and/or illness to any XYZ Labs employee;
- Personal injury and/or illness to non-XYZ Labs personnel while on or using XYZ Labs-owned property;
- Damage to XYZ Labs-owned property; or
- A near miss event that didn't but had the potential to cause harm or damage.

3.0 Responsibility

3.1 Department heads, managers and/or supervisors -- are responsible for:

- a. Ensuring that all accidents/incidents are properly reported and investigated in accordance with this operating procedure.
- b. Ensuring that all corrective actions are promptly and completely carried out.

3.2 Employees -- Are responsible for reporting any injury/illness work-related accident or non-injury incidents to their manager/supervisor as soon as possible. All accidents/incidents must be reported by no later than the end of the employee's regular work shift.

3.3 The Office of Environmental Health & Safety (EHS) – Must participate in accident investigations either directly or by review of the report as deemed appropriate to the incident. The Director of EHS shall determine the level of participation that is warranted. EHS is also

responsible for administering the Workers' Compensation benefits program for work-related injuries or illnesses.

4.0 Definitions

4.1 Major Accident -- - Any injury or illness-related accident that results in:

- a. Death;
- b. Amputations involving the loss of bone tissue;
- c. Loss of consciousness;
- d. Possible permanent functional impairment of a body part (excluding those resulting from a back strain);
- e. Admission to a hospital (other than 24-hour observation, hernia repair, back strain or outpatient visit).

4.2 OSHA Recordable Incident - Any accident/incident that results in:

- a. Medical treatment other than first-aid, (Examples: treatment of an infection, sutures, second or third degree burns, etc.);
- b. Restriction of normal work activities (reduced work activities, or reduced work days);
- c. In days away from work (lost-time); or
- d. Any occupational illness.

4.3 First-Aid Only -- Any accident/incident which results in a minor injury that can normally be treated or cared for by the employee and/or his supervisor, and does not result in any of the conditions identified in Section 4.2. Note First-aid can be administered by a medical professional and not result in an OSHA-recordable incident.

4.4 Near Miss Incident -- - An incident which does not result in personal injury or illness, or property damage, but had the potential to do so.

5.0 Notification Procedures

5.1 Notification During Regular Working Hours -- - Any XYZ Labs employee involved in an accident/incident (as defined in Section 4.0) during regular working hours shall:

- a. Report the occurrence to their department manager or supervisor as immediately as possible, but by no later than the end of the regular work shift. Failure to properly report an incident can result in disciplinary action and/or denial of benefits.
- b. If the incident only involves first-aid treatment administered by either the employee or his/her manager/supervisor, or is a non-injury incident, the incident shall be documented on the DEPARTMENT INCIDENT LOG.
- c. If the work-related accident results in injury or illness requiring professional medical treatment, the employee shall be referred to the designated medical provider. If the injury or illness requires emergency medical treatment, contact 911.

- d. The employee's manager/supervisor shall report the event to the XYZ Labs EHS Office by no later than the end of the work shift of the day on which the event occurred. At a minimum, the manager/supervisor must provide the employee's name, date and time of accident, nature of injury/illness, and how the accident/incident occurred.
- e. The employee's manager/supervisor is responsible for conducting the initial accident investigation and completing the FIRST REPORT OF ACCIDENT/INCIDENT form.

5.2 Notification After Regular Working Hours -- Any XYZ Labs employee involved in an accident, that results in a work-related injury or illness, after regular working hours shall:

- a. Report the occurrence to the Police (Ext. 911) as soon as possible, but by no later than the end of the regular work shift. Failure to properly report an incident can result in disciplinary action and/or denial of benefits.
- b. The responding Police Officer shall:
 - investigate the incident as thoroughly as possible;
 - if the incident/accident involves an XYZ Labs employee, the responding police officer shall document the event including the employee's name, department, the name of the employee's immediate manager/supervisor.
 - forward a copy of the incident report to EH&S by no later than the end of the officer's work shift.
- c. If the accident requires emergency medical assistance, the Police Dispatcher shall notify the appropriate emergency medical services.

5.3 Deaths and/or Hospitalization Injuries -- - Any incident which results in deaths, or injuries shall requiring hospitalization to any employee shall be immediately reported to EH&S. EH&S shall be responsible for notifying the Occupational Safety and Health Administration (OSHA) -- Region [], within 8 hours in accordance with federal regulations.

5.4 Amputations-- Any incident which results in amputations shall be immediately reported to EH&S. EH&S shall be responsible for notifying OSHA -- Region [], within 24 hours in accordance with federal regulations.

5.4 Near Miss Incidents -- Any incident which does not result in injury or illness, but had the potential to do so, shall:

- a. be reported to the department manager or supervisor;
- b. the manager/supervisor shall document the event on the DEPARTMENT INCIDENT LOG;
- c. the manager/supervisor shall evaluate the incident and take the appropriate action to reduce or prevent recurrence. The manager/supervisor should consult with EH&S if assistance is required in evaluating and responding to the event.

6.0 Investigation Guidelines

6.1 Accident Scene -- When possible, the accident scene should be preserved and disturbance of any physical evidence should be prevented until the principal investigator(s) arrive. Unless

necessary to prevent further damage or injury, clean up or repair activities should commence only after all pertinent information has been collected.

6.2 Witnesses -- The principal investigator(s) shall identify and record the names of all individuals who witnessed the incident. Each witness shall be requested to provide a written statement identifying their account of the accident/incident. The witnesses shall be instructed to forward their written statements to EH&S.

6.3 Photographs -- When feasible, the principal investigator(s) should obtain photographs and or measured diagrams of the accident scene. All photographs and or diagrams shall be forwarded to EH&S for inclusion as part of the permanent record.

6.4 Questioning Injured Employees and/or Witnesses -- When questioning injured employees or witnesses, the investigator(s) shall stress that the purpose of the investigation is to identify facts and not to assign fault. At all times the investigator(s) shall ensure that proper medical treatment and care of any injuries is given priority over questioning of the personnel involved.

6.5 Investigation Findings -- The investigation team shall identify and record the root and contributory causes of the incident. Upon completion of the investigation, the investigation team will identify the appropriate corrective actions, indicate the personnel responsible for implementing the actions and assign a target completion date.

7.0 Accident/Incident Report Forms

7.1 First Report of Accident/Incident -- Department heads, managers and/or supervisors directly responsible for the employee(s) involved in an accident/incident shall:

- a. Complete all sections of the FIRST REPORT OF ACCIDENT/INCIDENT provided by EH&S;
- b. The responsible department head or manager should involve the injured employee and all identified witnesses in the accident investigation and corrective action processes.
- c. The original report forms shall be completed and forwarded to EH&S within 48 hours after the accident/incident has occurred. If additional time is required to complete the investigation, the manager/supervisor shall notify EH&S.

7.2 Police Report of Accident/Incident -- Any accident/incident that requires the response of the Police Department and/or any incident that occurs after regular working hours, the responding officer shall:

- a. Document the accident/incident using the Police Department Incident Report System. If the incident involves an employee, the report shall include the employee's department and the name of the employee's immediate manager/supervisor.
- b. Identify any and all witnesses to the incident, providing address and telephone number where the witness(es) can be contacted by an EH&S representative.
- c. Forward a copy of the Police Department incident report form to the Office of Risk Management Department by no later than the end of the officer's shift.

7.3 EH&S -- Upon receipt of the Police incident report, EH&S shall:

- a. Contact the employee's manager/supervisor to verify the incident and collect the preliminary information required to establish a workers' compensation claim with the designated carrier (if required). The manager/supervisor will be instructed to complete the FIRST REPORT OF ACCIDENT/INCIDENT form and forward that document along with any additional report forms or documents pertinent to the accident to EH&S. If necessary, copies of all report forms will be forwarded to the manager/supervisor.
- b. Upon receipt of the completed report forms, EH&S shall contact the XYZ Labs' designated workers' compensation insurance carrier to document a valid claim. EH&S shall also classify the incident and injury types and record all pertinent medical and treatment information; and
- c. EH&S representatives shall review the investigation findings and proposed corrective actions with the affected department's manager/supervisor.

7.4 EH&S Supplemental Reports -- for all major accidents/incidents (as defined) or when requested by the EH&S Director, a supplemental investigation and analysis report may be required. The report will include professional analysis of the investigation findings and recommendations of corrective actions and any photographs, documents and legal correspondence relevant to the incident.