



COMPANY HEALTH & SAFETY PROGRAM

Issue: A
Date: 4/20/2009
Rev: 1
Date: 2/4/2011
Authorized:

Title: Record Retention

Section No. 30

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1.0 PURPOSE

Power Process Piping, Inc. is acutely aware of the importance of proper record keeping, including health and safety related records. Therefore, this section was dedicated to the topic of record retention to impress upon PPP project managers and supervisors the company's insistence on diligent record keeping.

2.0 SCOPE

This section provides procedures to be followed to assure that PPP is in compliance with health and safety record retention regulations. Further, PPP mandates that the security of employee personal or confidential information is handled as a top priority.

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4.0 CONTROL OF DOCUMENTS

It is company policy that all key documents and records of communication are controlled. That includes all health and safety documents such as:

- First aid or medical treatment records;
- Non-injury medical status records;
- Background check documents
- All health and safety training records including orientations, weekly safety meetings and special safety meetings, as well as OSHA/MIOSHA, MUST, MCAA, First aid/CPR or any other formal safety training records;
- Weekly Safety Audit records;
- Safety Observation records; and
- Safety Discipline records.



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The PPP Health & Safety Program and related forms are subject to issue and revision control, except copies labeled as *Uncontrolled*. A *Master Copy* is maintained by the PPP safety director, which identifies current issue status of all health and safety documents.

5.0 **RESPONSIBILITIES**

All employees, as it applies to them, shall be responsible to focus on keeping health and safety documents legible, identified and protected from damage, deterioration and being misplaced.

Project managers shall assure that subcontractor prequalification documents are maintained with respective project files, and that subcontractors are in compliance with project record retention rules. Project managers shall strive to provide adequate job-site facilities for the safe and secure maintenance of health and safety files.

Project supervisors shall assure that all health and safety records related to their project are maintained at the job-site so they are:

- Identified;
- Readily available;
- Secure; and
- Protected from damage and deterioration.

Project supervisors shall provide the PPP safety director with copies or originals of all health and safety records, in compliance with provisions of this health and safety program. When the project is completed, health and safety files shall be archived with all other project files so they are identifiable and retrievable.

Project supervisors are not to make determinations on what or how long documents are to be retained. They are to maintain and archive all health and safety records as per this section.

The PPP safety director shall be responsible for receiving from job-sites, and maintaining on file, all pertinent health and safety records. The safety director shall determine what and/or how long health and safety documents are maintained, to be in compliance with government regulations and good practices.



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6.0 PROCEDURES

1. Supervisors shall assure that new employees hiring in and employees re-hiring in with PPP receive and review the PPP Orientation Manual. The card attached to the inside of the front cover that, when signed, acknowledges receipt and understanding of the manual shall be processed as follows:
 - It shall be checked that the employee has legibly printed his/her name on and signed and dated the acknowledgement card.
 - The card shall be attached to the employee's sign-up package.
 - Sign-up packages, including the card, shall be put in inter-departmental mail envelopes addressed to the PPP payroll manager at PPPHQ.
 - Envelopes shall be delivered only by authorized PPP employees.
 - The acknowledgement card shall be maintained in the employee's personnel file by the payroll manager.
 - The payroll manager shall notify the safety director if a sign-up package is received without an orientation acknowledgement card attached, and the safety director shall initiate appropriate action.
2. Documents that must be forwarded to the PPP safety director weekly, as well as maintained on file at the job-site, include, but are not limited to:
 - The outline and attendance record of the Weekly Site Employee Safety Meeting;
 - Outlines and attendance records of any special safety meetings or safety stand-downs; and
 - The Weekly Job-site Safety Audit.
3. Documents that must be forwarded to the PPP safety director as they occur, as well as maintained on file at the job-site, include, but are not limited to:
 - Personal Safety Violation Notices;
 - Accident/Incident and Near Miss reports including any first aid or medical treatment documents;
 - Non-injury medical status documents; and
 - Any and all safety training outlines and attendance records, no matter whom or what company conducted the training.



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4. Any documents that contain employee personal and/or confidential information (e.g., medical records, background check documents, sign-up forms, etc.) shall be handled with utmost security. These types of documents should be handled only by trained and authorized employees and never left unattended or otherwise unsecured.
5. Each recordable injury or illness must be entered on the OSHA 300 Log and 301 Incident Report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.
6. A company executive must certify that he or she has examined the OSHA 300 Log and that he or she reasonably believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete.
7. A copy of the OSHA 300A Log must be posted in the Shop and at each job site in a conspicuous place or places where notices to employees are customarily posted. Posted Logs shall not be altered, defaced or covered by other material.
8. The OSHA 300A Log 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.
9. The OSHA 300 and 300A Logs, 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.

REVISION HISTORY

Revision number	Description of change	Written by	Checked by	Effective date
1	Revised to meet current standards	George Newton	Safety	2/4/2011
	Program reviewed and Revision History added		GMN	4/16/2014