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Project Occupational Health Records Maintenance System Procedure

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Project Occupational Health Records Maintenance System Procedure

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Project Occupational Health Records Maintenance System Procedure

1.0 PURPOSE

The purpose of this procedure is to identify the corporate Safety and Health Services System for collecting, assembling, and tracking employee occupational health records including personnel exposures to radiation, chemicals, and noise. Occupational Health Records Maintenance System (OHRMS) maintains employee files of physical records and a database of the information.

The database also tracks safety and health-related training (e.g., asbestos), physical examinations required by agencies (e.g., the Occupational Safety and Health Administration, the Health and Safety Executive, etc.), and documentation of exposure to hazardous substances, radiation, and noise.

2.0 SCOPE

The scope of this procedure applies to all works performed under the Government Expenditure & Projects Efficiency Authority throughout the Kingdom of Saudi Arabia.

3.0 DEFINITIONS

Definitions	Description
Active File	File retained for current subcontractor employees.
Administrative Record	The paper or electronic data record generated to allow efficient operation of the OHRMS
Hard Copy Record	The paper documentation of primary or secondary records that is retained until the records are recorded in an electronic data base.
Hazardous Substances, Materials, or Agent	Substances that create chemical, radiological, or physical hazards. For this procedure, these substances are referred to as "hazardous materials."
HSSE	Health, Safety, Security and Environment
Inactive File	File retained for historical purposes after an individual terminates from employment.
OHRMS	Occupational Health Records Maintenance System
OSHA	Occupational Safety and Health Administration
Primary Record	The hard copy or electronic data record of an individual's occupational health exposure to hazardous materials.
Record Copy	The paper copy data base document maintained as the original record document for 75 years. The record copy includes primary and secondary records.
Secondary Copy	The paper copy, or electronic data document that supports or provides the basis for primary records.
Sensitive Information	Information that must be controlled to comply with the intent of any Saudi Regulation, including, but not limited to, social security account number, health status, and information related to an individual's exposure to hazardous substances.

4.0 REFERENCES

1. OSHA 29 CFR 1910 Occupational Safety and Health Standards
2. OSHA 29 CFR 1926 Safety and Health Regulations for Construction
3. OSHA 29 CFR 1904 Recording and Reporting Occupational Injuries and Illness
4. EPM-KSH-PR-000001 Project Medical Assessment and Surveillance Procedure
5. EPM-KSH-PR-000010 Project Hearing Conservation Program
6. EPM-KSH-PR-000045 Project Air Surveillance Program Procedure

5.0 RESPONSIBILITIES

5.1 OHRMS Administrator

The OHRMS Administrator has the following responsibilities:

- Coordinates system development, administration, security, and audit.
- Coordinates user authorization/access.
- Trains personnel in system requirements and methodology.
- Supervises and implements the program on a regional basis.
- Ensures that records are maintained, filed, uploaded into electronic data base distributed, and disposed of in compliance with this procedure.
- Ensures confidentiality of primary records.
- Interacts with automation technology, human resources, accounting, and records administration personnel.
- Develops, revises, and distributes procedural changes, OHRMS database training materials, and database user's reference guide.

5.2 HSSE Manager

The HSSE Manager has the following responsibilities:

- Ensures confidentiality of primary records.
- Submits records in accordance with this procedure.
- Submits training class rosters to OHRMS.
- Indoctrinates Project Management and other project personnel in content and applicability of this procedure.
- Notifies affected employees of monitoring results.
- Ensures that primary records are properly obtained and transmitted to OHRMS through project document control personnel.
- Provides timely updates of information to the OHRMS Administrator.

5.3 Human Resource Representative

The Human Resource Representative has the following responsibilities:

- Forwards completed Notification to OHRMS of Personnel Action Form to the OHRMS Department.
- Forwards completed Request for Occupational Health Records and Release of Radiation Exposure Information to OHRMS.
- Forwards completed OHRMS Employee Acknowledgment Form to OHRMS.

6.0 RECORD CONTENT

6.1 Primary Records

The following data or information, as available or appropriate, are maintained as primary records by the OHRMS department:

- Individual external radiation exposure dosimetry results.
- Calculations of personnel exposure data.
- Records of exposures to hazardous materials.
- Physician Statements required by EPM-KSH-PR-000001 Medical Assessment and Surveillance Procedure.
- Reports of bioassay analyses (including in-vitro body fluids, whole body, or lung count).

- Laboratory reports of individual-specific exposure monitoring results (i.e., asbestos).
- Individual Safety and Health training records or certificates.

7. Air Sampling Data Sheets required by HSSE EPM-KSH-PR-000045 Project Air Surveillance Program Procedure

- Noise Monitoring Form required by HSSE EPM-KSH-PR-000010 Hearing Conservation Program.

6.2 Secondary Records

The following information, as appropriate, will be maintained by the projects or operating facilities:

- Instrument calibration records.
- Final safety and health report reflecting characterization summaries of site chemical and radiological contamination survey results, including soil, water, sludge, etc.
- Summary of radiation dose rate survey data, including instrument calibration.
- General area noise monitoring data, including instrument calibration records.
- Weekly safety meeting reports.
- Project logbooks (i.e., site safety and health daily logs, site superintendent logs, etc.).

6.3 Administrative Records

The following data or information will be maintained as administrative records by OHRMS:

- Completed Access Authorizations.
- Site Worker Documentation.
- Completed Access Verification documentation.
- Subcontractor Employee Certifications.
- Confidential Records Transmittal Form.
- Training class attendance rosters, including weekly safety meeting rosters, if being used to satisfy refresher training requirements.
- General area chemical and radiological air monitoring and sampling results with associated documentation, including instrument calibration records.

7.0 RECORDKEEPING REQUIREMENTS

7.1 Copies of Records

All entities are responsible for maintaining copies of primary health records and ensuring that those records are forwarded to OHRMS for maintenance in a timely manner.

Projects or operations may retain a copy of primary records as required by governing regulation and/or client requirements, if the records are maintained in a secure, confidential manner.

7.2 Storage Requirements

Paper copies of primary records will be maintained in lockable, fire-resistant file cabinets until the records are uploaded into an electronic data base.

After entering documents into the data base, the original will be transmitted to a secure, offsite, facility as a confidential record.

Record copies of secondary records will be maintained by projects and/or entities in an orderly and secure manner, consistent with good business practices.

7.3 Filing Requirements

Record paper copies of primary records will be maintained in individual-specific files (i.e., by last name, in alphabetical order). The following records/files will be maintained by OHRMS:

- Active and inactive record paper copy files.
- Primary record data.
- Subcontractor information.

Data maintained by OHRMS will provide cross-referencing as applicable management programs. Original documents will be transmitted to a secure, offsite facility.

7.4 Record Retention and Disposition

Data base copies of primary and secondary records will be maintained for 75 years or until entity ceases to exist as an organization.

Administrative records not filed in individual-specific files may be maintained for as long as the OHRMS Administrator deems necessary. As a matter of practicality, administrative records that are placed in an individual's file will be electronic data base with the rest of the file and retained for 75 years.

If required by clients, participating entities will be responsible for providing copies of project or operation specific occupational health records in accordance with the pertinent records retention and turnover plan.

Participating entities will, at termination of project activities or upon termination of an employee, forward all primary occupational health records not previously transmitted. Transmittal will be in accordance with Section 9.0 of this procedure. Duplicate copies of such records may be destroyed after written concurrence is received from the OHRMS administrator. Participating Entity forwarding primary records will provide a charge number for entering the records in the database.

8.0 ACCESS TO RECORDS

8.1 Individual's Access to Personal Records

Upon written request, individuals will be provided access to, or copies of, their own primary records. The written request should specify the information desired, social security number, date of birth, or other applicable individual identification.

Upon receipt of the individual's request (if submitted by mail), OHRMS will make every reasonable effort to respond in writing within 5 working days. If this is not feasible, the individual will be promptly notified.

The notification will include the reason for the delay and the statement that specific action will be taken within 15 working days unless precluded by "unusual circumstances and for good cause", submittal of insufficient identification information, search for requested records from inactive storage, etc.).

An individual may be permitted access to his/her onsite, active files if the following conditions are satisfied:

- All requested information can be separated from other individual primary records. All requested information can be separated from other individual primary records.
- All requested information is complete and accurate.

If any of these conditions cannot be satisfied, access will be denied until all three conditions can be met. Access cannot be denied for more than 30 working days, except for unusual circumstances or for good cause.

8.2 File Review Security Policy

The following rules are to be followed while accessing sensitive files and documentation:

- Each reviewer must have written authorization from the OHRMS Administrator or designee before obtaining access to the files.
- The OHRMS Administrator or designee will transport all files into and out of the secured filing cabinets.
- Files must be reviewed under the supervision of the OHRMS Administrator or designee.
- Files may not be removed from the OHRMS secure area of the floor.
- Copies of documents within sensitive files must be made by the OHRMS Administrator or designee.

8.3 Access to Primary Records by Other Individuals

Access to primary records is limited to individuals with a designated "need to know" status. The OHRMS Administrator will make determination of the “need to know” status.

An individual must put in writing the reason for access, and send request to the OHRMS for approval.

8.4 Access to Secondary Record

Secondary records are confidential; access to them will be governed by project, client, and Entity requirements.

8.5 Documentation of Record Access

Each request for access to primary records will be documented, and the documentation will be retained as follows:

Personal Access to Primary Records*:* For requests submitted by mail, the written request and the Entity response will serve as acceptable records of access.

For onsite access, the individual's written request will serve as acceptable records of access. These documents become part of the administrative record.

9.0 TRANSMITTAL OF RECORDS

9.1 Primary Records

Primary records may be transmitted manually in sealed, solid envelopes, clearly labeled:

"PERSONAL AND CONFIDENTIAL"

or

"CONTAINS SENSITIVE INFORMATION"

A completed Confidential Records Transmittal Form will be part of the package.

Addressees will be limited to authorized individuals with access authorization (e.g., Document Control OHRMS Administrator, OHRMS staff). HSSE Managers will transmit all such documentation through the project document control center to ensure accountability for this information within project master files. The project document control center will retain only the Confidential Records Transmittal Form and will forward the remainder of the package to the OHRMS Administrator or OHRMS staff unless obligated by project requirements to make a complete copy of the package for future client turnover before transmitting the original to the OHRMS Administrator or OHRMS staff.

Electronic transmittal of primary records is permitted if the transmittals are maintained in a secure and confidential manner.

9.2 Secondary Records

Transmittals of secondary records may be made by any method used during the normal course of business (e.g., post/mail, interoffice or plant mail, courier, electronic transmissions).

9.3 Required Reporting and Notifications

Radiation dose summaries will be provided by the project to appropriate governmental agencies and individuals as specified by regulatory, client, and project requirements.

Regulatory agencies may require written notification to exposed individuals in some cases. Each project will be responsible for these notifications based upon consultation with the OSHA standards or other applicable governmental or regulatory standards for the specific hazardous material sampled and the timeliness of the required written notification to the exposed worker.

10.0 TRAINING

The OHRMS Administrator trains the HSSE Managers in the application and administration of this procedure.

The HSSE Managers ensure that all Project HSSE Supervisors receive training on the administration of occupational health records.

The HSSE Manager indoctrinate Project Managers and other appropriate project personnel regarding the requirements and implementation of this procedure.

11.0 ATTACHMENTS

N/A