

SAFETY REPORTING AND RECORDKEEPING

1.0 Purpose & References

This Mobile Mini (MMI) Health & Safety Standard Operating Procedure (SOP) describes the requirements the Mobile Mini Safety Department must follow for reporting work-related injuries and illnesses of Mobile Mini employees to OSHA. Federal and state regulations require that Mobile Mini make immediate reports to the government when certain work-related injuries occur. In all cases, occupational fatalities must be reported to OSHA with specific timeframes. Because of these regulatory reporting requirements, it is critical Branch Managers immediately report incidents to the Mobile Mini Safety Department.

In addition to specifying reporting requirements for these serious incidents, Occupational Safety and Health Administration (OSHA) Standard 29 CFR 1904, Recording and Reporting Occupational Injuries and Illnesses, requires recording of less serious occupational injuries and illnesses. Mobile Mini Supervisors must report all these work-related injuries and illnesses to Divisional Safety Manager within 24 hours by following the procedures described in this SOP. Failure to report or record occupational injuries and illnesses could subject Mobile Mini to significant OSHA penalties as well as unfavorable publicity.

References

- Mobile Mini SOP - Incident Notification Reporting and Investigation

2.0 Scope and Application

This SOP covers incidents that involve work-related injuries or illnesses and the required reporting and recordkeeping. This SOP references and incorporates the Mobile Mini Incident Notification, Reporting and Investigation procedures outlined in a separate SOP. This SOP must be followed by all Mobile Mini employees, subcontractors, and lower-tier subcontractors that operate on behalf of Mobile Mini.

Incidents which cause serious injury, illness, or property loss, or have the potential to do so, must be immediately investigated and the root causes determined. The data and information gained from these investigations will be evaluated and used to prevent future incidents.

3.0 Definitions

3.1 First Aid Cases

First aid cases are injuries or illnesses that consist of first aid treatments that meet the OSHA definition. OSHA defines medical treatment as the management and care of a patient to combat an injury or illness. OSHA's definition of medical treatment does not include visits to a physician or other licensed health care professional solely for observation, counseling, diagnostic procedures or first aid.

A first aid case generally refers to a short, one-time treatment and requires little or no technology to administer. First aid cases can include cleaning minor cuts, scraps/scratches, and treatment of a minor burn.

3.2 OSHA Recordable Injury or Illness

The following are considered OSHA recordable injuries:

- A work-related injury or illness that results in death, loss of consciousness, lost or restricted workdays or job transfer, or medical treatment beyond first aid;
- Any other work related significant injury or illness diagnosed by a physician or other licensed medical professional even if none of the above criteria are met;

- A work-related needle stick injury or cut from a sharp object that is contaminated with another person's blood or other potentially infectious materials; and,
- A hearing test showing a work-related Standard Threshold Shift in one or both ears and the employee's total hearing level is 25 decibels (dB) or more above audiometric zero.

3.3 OSHA 300 log

The OSHA 300 log is a form that Mobile Mini uses to record all reportable injuries and illnesses that occur in the workplace, where and when they occur, the nature of the case, the name and job title of the employee injured or made sick, and the number of days away from work or on restricted or light duty, if any. The OSHA 300 log data is maintained electronically and housed within the Mobile Mini Safety Sharepoint site.

3.4 OSHA Reportable Injury

An OSHA reportable injury is any work-related injury or illness that results in a death of one or more workers or the in-patient hospitalization of one or more workers. These injury cases must be reported immediately to OSHA, but not less than within 8 hours. Any fatality resulting from a heart attack occurring at work is also OSHA reportable. Such incidents will be reported to OSHA within 8 hours.

3.5 Privacy

Protecting workers' right to privacy shall be a primary concern in the conduct of this program. Only authorized Mobile Mini personnel shall have access to workers' personal information contained in injury or illness records. All records that contain workers' personal information shall be kept secure from unauthorized access. OSHA privacy requirements, including special treatment of privacy concern cases, will be followed where applicable.

3.6 Restricted Duty

A returning worker is said to be on restricted duty when a physician or other licensed health care professional recommends that the worker return to work but not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work.

3.7 Work Related Injury and Illness

A Work-related injury or illness includes all injuries and illnesses that result from an event, incident or exposure in the Mobile Mini work environment. "Work environment" includes Mobile Mini branch locations, customer locations when on assignment, and other locations where Mobile Mini employees are performing work.

4.0 Roles and Responsibilities

Listed below are the roles and responsibilities those participants in the SOP Reporting and Recordkeeping process.

4.1 Employees

Employees are responsible for immediately notifying their direct supervisor of all incidents, including what may be perceived as a "minor" incident. Employees must provide specific information related to incidents they experienced or witnessed during the subsequent incident investigation to ensure accurate OSHA reporting as required.

4.2 Branch Managers (BM)

The BM will ensure timely reporting of incidents that are or could trigger OSHA recordability status.

The Branch Manager will ensure all incidents are reported and this SOP is effectively implemented. The Branch Manager will ensure the incident is reported and the incident investigation process begins as directed the Safety Manger/Director, and other parties involved in the process. Prompt reporting of an injury that is (or could be OSHA Recordable/Reportable), will assist in the timely and accurate OSHA reporting, as required.

4.3 Division Safety Managers/Safety Director

The Safety Managers/Directors are responsible for ensuring appropriate communication to all regulatory agencies, in conjunction with legal or Mobile Mini General Counsel advice. The Safety Managers/Director will assist the Branch Managers in the supervision of and implementation of this SOP, and follow through of corrective actions. The Safety Manager/Director is responsible for maintaining the incident database current in compliance with OSHA regulations, reporting to OSHA and any other regulatory agency as defined by incident type. The Safety Manager/Director will periodically review the safety reporting process to ensure compliance with OSHA recordkeeping requirements. The Safety Manager/Director will ensure the OSHA logs and information is immediately accessible when requested.

5.0 Requirements for OSHA Reporting and Recordkeeping Requirements

All work-related injuries and illnesses must be reported by following the steps described below. For further explanation, employees must reference and follow the procedures outlined in the Mobile Mini SOP Incident Notification, Reporting and Investigation.

In summary, the Branch Manager/Supervisor should immediately halt the work of the Mobile Mini employees at the accident/injury site. If the accident site is on property controlled by Mobile Mini, the Supervisor will:

1. Take precautions to prevent further injury to other persons in the area
2. Take feasible precautions to limit the spread of damage and not expose Mobile Mini employees to further damage
3. Provide for the emergency medical treatment to any injured person
4. Make provisions for the injured to be transported to the appropriate medical facility
5. Secure the accident/injury site to preserve the details until the facts leading up to the incident are gathered
6. Have all unnecessary personnel leave the work area
7. Assure that nothing is cleaned up or tampered with by all unauthorized persons
8. As required by local emergency medical services, rope/tape off the area and allow only the following to enter only authorized personnel.
9. Notify the Divisional Safety Manager/Director and Regional Manager. The Divisional Safety Manager/Director will coordinate with the Branch Manager and first responders (i.e., police officer, fireman, etc.) and assist with the performance of the following tasks:
 - a. Assist with the investigation of the accident/injury site.
 - b. Interview any witnesses to the incident.
 - c. Ensure adequate photographs of the accident/injury site and any machinery, equipment, tools and/or other equipment involved.
 - d. Perform measurements and report on the dimensions and sketch the accident site and any objects involved in the accident/injury.
 - e. Make note of any chemicals or substances at the scene of the accident.
10. The Branch Manager is responsible to notify the client/customer of any injury/incident that occurs on their property as required to contract documents.

An employee who has a work-related injury or illness will notify his/her first level supervisor and Branch Manager immediately. If someone other than the official supervisor of record was supervising the worker, an “acting supervisor,” that person must be notified and must act as supervisor in filling out the Supervisor’s Injury Report form. The acting supervisor will notify the official supervisor and Branch Manager as soon as possible. If the injured worker needs medical attention, if not a medical emergency, the Supervisor/Branch Manager will contact the on-call WorkCare nurse for triage assistance. If truly emergent, local emergency medical services must be sought.

For all injuries determined to be work related, a new case, and all other injury cases that meet the OSHA recordable status, Mobile Mini maintains the written investigative records for these cases. This information may include: pictures, investigative notes, emails, fact sheets, injury reports, employee or Supervisor statements, or other communications that are critical in outlining the facts of the case.

5.1 Determining OSHA Recordability

The Safety Director, after consultation from the Safety Manager and after review of the investigation notes, pictures, and other details, makes the determination of whether or not an injury or illness meets the intent of the OSHA recordability regulation. The Safety Director may contact the Branch Manager, Supervisor, injured employee, or Safety Manager for missing forms or for additional information where necessary. If the incident is recordable, it is placed on the electronic log database (Sharepoint). For all other First Aid cases (not recordable), the injury details, reports and other facts are also noted on the Mobile Mini Safety Sharepoint site. Following any injury, a Supervisor and the injured employee is required to complete an incident form.

5.2 Internal Mobile Mini Notification

The Safety Director will notify the Legal Department and the Senior Management Team immediately if a work-related incident results in a fatality, the in-patient hospitalization of one or more employees, a work related amputation or a work related loss of an eye. Mobile Mini views these incidents as extremely serious and recognizes the requirements for OSHA reporting. The Safety Director is charged with notifying OSHA within applicable timeframes. The Safety Manager/Director will work with the Branch Manager to create an action plan to follow-up on any hazards noted during the investigation which may or may not have contributed to the injury as follow-up.

5.3 OSHA 300

Based on the medical treatment data learned from the Supervisor’s, Employee Injury/Incident Report, and the Workers Compensation process, the Safety Director classifies each injury or illness as OSHA Reportable (and/or Recordable) and provides the timely notification. The Safety Director maintains the incident reports, and OSHA log recordkeeping electronically, on the Mobile Mini Sharepoint site. All documents must be maintained a secure fashion. The OSHA log information must be completed and officially logged within seven (7) days of the incident. The OSHA 300A Summary is required to be posted each year in a conspicuous location, between February 1 and April 30 with the previous’ years safety data. The OSHA 300A Summary must be posted in a conspicuous location visible to all employees. Generally, this information is to be posted on the Branch Safety board at each branch (including Service Center) during the required posting timeframes. The completed OSHA 300A Summary must be signed by a company official before posting.

The Safety Director enters and update information on the Mobile Mini Sharepoint on the status of the OSHA Recordable injuries and illnesses. This information feeds the EDW reporting tool where OSHA logs are automatically run and available to all Mobile Mini personnel.

5.4 Regulatory Notification

Mobile Mini respects and conforms to the OSHA requirement for formal notification in these injury cases:

1. Notification to OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye;
2. A fatality will be reported to OSHA within 8 hours; and,
3. An in-patient hospitalization, amputation, or eye loss is reported within 24 hours
 - a. Where the inpatient hospitalization is due to a traffic accident, Mobile Mini is not required to notify OSHA.

The Safety Director, in conjunction with the Legal Department office, must follow specific procedures to report the incident. The Safety Director must call the Area Office of OSHA nearest the site of the incident or the OSHA central telephone number at 1-800-321-6742. The Safety Director must talk to a live person; leaving a voicemail message is not acceptable. The Safety Director must provide OSHA with the following information about the incident:

- The establishment name (Mobile Mini)
- The location of the work-related incident
- The time of the work-related incident
- The type of reportable event (i.e., fatality, inpatient hospitalization, amputation or loss of an eye)
- The number of employees who suffered the event
- Names of the employees who suffered the event
- Mobile Mini’s contact person and phone number
- A brief description of the work-related incident


6.0 Training Requirements

All employees, including Branch Managers will be trained in accordance with these OSHA Reporting and Recordkeeping requirements. BMs will be trained to notify the Safety Department in a timely fashion to ensure regulatory notification, where required, occurs. Additional training may be required if a task is modified or new procedures are instituted.

7.0 Records Retention and Management

29 CFR 1904.33 requires that the OSHA 300 log, annual summary, the OSHA 301 Incident Reports forms, and Supervisor’s Report forms be retained for at least five years following the end of the calendar year that these records cover. At Mobile Mini, these records will be retained for the required period.

8.0 Revision Log

Revision	Date	Written by	Description	Approved by
1	8/2016	Sean Kriloff	Revision	
2	08242016	Sean Kriloff	Clarified section 5.3 to include OSHA 300A Summary	