ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS

ACCESS
“Access,” means the right and opportunity to examine and copy. Access to employee medical and exposure records will be provided in a reasonable manner and place. If access cannot be provided within 15 days after the employee’s request, SONOCO will state the reason for the delay and the earliest date that the records will be made available. Responses to initial requests, and new information that has been added to an initial request, will be provided without cost to the employee or representative. SONOCO shall provide employees copies of the requested records while it retains the originals. In addition, medical and exposure records will be made available to OSHA representatives for examination and/or provided copies as needed. Request shall be made through the Human Resource Department/Safety Department, should be in writing and requires a notarized employee written approval before records can be released to an employee representative.

EXPOSURE RECORDS
Upon request, SONOCO will provide the employee, or employee’s designated representative access to employee exposure records.

MEDICAL RECORDS
SONOCO will provide employees and their designated representative’s access to medical records relevant to the employee’s employment. Access to the medical records of another employee may be provided only with the specific written consent of that employee. The OSHA standard provides a suitable sample authorization letter for this purpose. Prior to employee access to medical records, the company physician, may on behalf of employer, discuss with the employee the contents of their medical records. Copies of medical records will not be given for employees use in seeking new or additional employment as this is not the purpose of this program. Employee medical records are records that concern the health status of an employee and are made or maintained by a physician, nurse, or other health care personnel, or technician either company employed or 3rd party.

ANALYSES USING EXPOSURE OR MEDICAL RECORDS
The standard assures that an employee/representative or OSHA, can have access to analyses that were developed using information from exposure or medical records about the employee’s working conditions, workplace(s) and can contain either environmental and/or biological monitoring when warranted. All personal identifiers shall be removed from the data analyses prior to access.
RETENTION OF RECORDS
SONOCO will preserve and maintain accurate medical and exposure records for each employee. Medical records, exposure records and data analyses based on these records shall be kept for at least the duration of employment plus 30 years or as required by law. Background data for exposure records such as laboratory reports and work sheets shall be kept for 1 year. Records of employees who have worked for less than 1 year need not be retained after employment if the company provides/offers these records to the employee upon termination of employment. First-aid records of one-time treatment shall not be retained for any specified period. OSHA does not mandate the form, manner, or process by which an employer preserves a record, except that chest x-ray films must be preserved in their original state. Information that is confidential in nature will not be released to any persons not authorized by the employee in writing. All records will be kept on file at the company’s main office, 5450 West Main Street Houma, LA 70360. Should SONOCO be bought out, sold or disbanded, all records will be turned over to new owner(s) and maintained/retained as outlined by policy/law. Medical records and exposure records reviewed by medical personnel will be available as part of “patient record” at the facility performed by law as well.

Written records will be kept of all work related fatalities, injuries and illnesses. All injuries will be recorded on the OSHA 300 log as required by law within 7 days of the incident. These incidents will also be posted on the OSHA 300a summary, signed by a company official, posted at the office for anyone interested to see and displayed from February 1 thru April 30 of the year following the accidents. These logs are kept on file for 5 years.

All employees are informed and trained on provision of recordkeeping at hire (initial assignment) and annually thereafter through documented safety meetings.