

# Documentation and Record Keeping

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## Introduction:

Training is one of the most important components of a comprehensive health and safety program. Done correctly, it gives employees an opportunity to learn their jobs properly, bring new ideas into the workplace, reinforce existing ideas and practices and help put our safety and health program into action. Additionally, the Occupational Safety and Health Act (OSHA) and similar regulatory agencies require EHS training at the workplace in many different circumstances. The regulations make it clear when training is required.

ANSI Z490.1, titled “*Criteria for Accepted Practices in Safety, Health and Environmental Training,*” provides a national standard for creating, maintaining, and evaluating an EHS training program. With this plan, the University of Utah means to demonstrate our intention to implement an ANSI Z940.1 compliant training program.

This document is part of the complete “UU Safety Training Plan” with the overall objective to:

- Identify all required and recommended environmental, health, and safety training;
- Provide mechanisms to ensure that such training is completed;
- Document all safety training;
- Make training-related records and reports available to managers and regulatory agencies;
- Provide a mechanism to ensure continuous improvement of the Safety Training Program.

## Application:

This document is to be utilized to provide the frame work for record keeping and documentation. An Important element of an overall training program management system is record keeping and documentation. Certain Regulations require specific records be kept for proof of completion or required training. Departments may also want to keep additional records to demonstrate their training efforts to control liability issues.

If any of the provisions of this standard are not applicable, the other requirements of the standard shall still apply.<sup>1</sup>

## Objectives:

The objective of the Documentation and Record Keeping document is to:

- Understand and apply the ANSI/ASSE Z490.1 – 2016, Section 7 standard to maintain records and documentation for training which will include:
  - Ease of access
  - Confidentiality
  - Training Development
  - Training Delivery
  - Training Evaluation
  - Credit and Certificates of Completion

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<sup>1</sup> ANSI/ASSE Z490.1 – 2016, Section 1.3.1

## General Requirements for Training Documentation and Recordkeeping

A recordkeeping system shall be used to control all records and documents so they are:<sup>2</sup>

- Easy to retrieve and identify and are maintained in an orderly fashion
- Current, accurate, legible, and dated, and that the dates should include revision dates when appropriate.
- The records satisfy relevant/applicable regulatory and/or legislative requirements.

Retained for a specified time period – Retention of records may be regulated by legislative or regulatory policies.

The written training plan should include procedures for document control of these documents and records.

## Records of EHS Training Development

The written program shall include procedure for document control.<sup>3</sup>

Records shall identify:

- Your target audience
- The learning objectives
- Sources used to develop your training materials
- The person(s) designing and developing the training materials
- The qualifications of that person or persons
- All training materials developed for a course
- Plans for evaluating the course and for continuing improvement of the course

## Records of EHS Training Delivery

Delivery Records shall include the following items:<sup>4</sup>

- Date of training
- Location of training
- Duration of training
- Name and description of course
- Names of person(s) delivering training
- Qualification of that person(s)
- Delivery method used for training
- Trainees attending/participating
- Trainees who successfully completed the training

A unique identifying number shall be provided to each trainee by the employer (UNid?)

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<sup>2</sup> ANSI/ASSE Z490.1 – 2016, Section 7.1.1

<sup>3</sup> ANSI/ASSE Z490.1 – 2016, Section 7.1.2

<sup>4</sup> ANSI/ASSE Z490.1 – 2016, Section 7.2.2

## EHS Training Records: Confidentiality and Availability

When it comes to “access, availability, and confidentiality of records,” your written training plan should include procedures for this.

On the issue of confidentiality, the standard reminds you that your EHS training records must “meet regulatory requirements for availability, disclosure, confidentiality, and protection of trade secrets.”<sup>5</sup>

## Issuing Certificates for Completion of EHS Training

Credit and Certificates shall be issued in accordance with recognized established standards, regulations, or industry protocols.<sup>6</sup>

No credits or certificate of training shall be issued unless the criteria for completion have been met by the trainee.”<sup>7</sup>

The certificate must include:

- Trainee’s name
- A unique number that identifies the trainee
- Course title
- Date and hours of instruction
- Statement that trainee has successfully completed the course
- Number of credits, if issued
- Name and address of the training provider
- Date the periodic refresher course is due (if required), or the completion expiration date
- The level of training or type of certificate awarded (if applicable)
- Any other information required by any related regulation
- Signature of BOTH trainee and training provider

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<sup>5</sup> ANSI/ASSE Z490.1 – 2016, Section 7.3.1

<sup>6</sup> ANSI/ASSE Z490.1 – 2016, Section 7.4.2

<sup>7</sup> ANSI/ASSE Z490.1 – 2016, Section 7.4.3