

1.1 PURPOSE

- 1.1.1 The purpose of this policy is to provide TERRY R PITT CONSTRUCTION employees with the corporate requirement of and guidance to participate in TERRY R PITT CONSTRUCTION's Behavior Based Safety (BBS) program.

1.2 RESPONSIBILITIES

- 1.2.1 Management and the safety department are responsible for the development, implementation, and management of the BBS process so as to adapt it to the unique needs of the jobsite.

1.2.2 Supervisor and foreman

- 1.2.2.1 Support the process with a positive attitude, by speaking at toolbox/safety meetings, and encouraging observers to do their observations.
- 1.2.2.2 Provide safety committee members and observers the time necessary to participate.
- 1.2.2.3 Allow observations to be performed in work areas without interruptions.
- 1.2.2.4 Follow up on feedback provided by the safety committee.
- 1.2.2.5 Attend the training course and provide suggestions that will improve the process.
- 1.2.2.6 Be a safety role model.
- 1.2.2.7 Take necessary actions to support the implementation of any action plans.
- 1.2.2.8 Use information obtained from observation cards to generate topics for safety meetings.

1.2.3 Employee

- 1.2.3.1 Participate in the observation process and be open to receiving feedback.
- 1.2.3.2 Treat observers with courtesy and respect.
- 1.2.3.3 Monitor while performing normal work tasks.
- 1.2.3.4 Participate in the training.
- 1.2.3.5 Perform observations regularly; provide quality data, and good, quality comments.
- 1.2.3.6 Maintain anonymous nature and be consistent in the observation process.
- 1.2.3.7 Report the true findings of the observations.

1.2.3.8 Do not become enforcers of policy during observations.

1.3 EXPECTATIONS

1.3.1 TERRY R PITT CONSTRUCTION has developed and implemented company safety programs and policies intended to achieve total employee safety. TERRY R PITT CONSTRUCTION recognizes that written sets of instructions or verbal mandates are ineffective when employees do not understand or choose to supersede them. Consequently, it is important that employees remain focused on daily job activities and pay special attention to those non-routine tasks that they will perform.

1.3.2 TERRY R PITT CONSTRUCTION has developed the program to create a foundation from which subsequent job-related decisions and actions are based. TERRY R PITT CONSTRUCTION has developed the BBS program under the following guidelines.

1.3.2.1 Commit to assessing critical behaviors by listing them on an observation card. Critical behaviors will be taken from historical incident data as well as observed behavior.

1.3.2.2 Observations of person(s) and their behavior(s).

1.3.2.3 The person being observed should be anonymous.

1.3.2.4 Who is doing the observing?

1.3.2.5 What is the work being done?

1.3.2.6 Where is the work being done?

1.3.2.7 When is the work being done?

1.3.2.8 Description of unsafe/safe behaviors observed.

1.3.2.9 Feedback from employee explaining unsafe behavior.

1.3.2.10 Recommendation for action from observer, as needed.

1.3.3 Observation data will be maintained for a period of not less than one year from the date of the observed activity.

1.3.4 Any hazardous condition identification will be addressed on the JSA or as part of remediation plans pursuant to a facility/site inspection.

1.3.5 PPE, body positioning, tools, and equipment will be included, at minimum, on the observation card.

1.4 ACTION PLAN

1.4.1 An appropriate action plan will be created to address unsafe behavior. Action plan steps will include:

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- 1.4.1.1 Evaluate unsafe behaviors from trend analysis and prioritize. TERRY R PITT CONSTRUCTION will collect data to establish a trend analysis for comparison of employee behaviors over selected periods of time.
- 1.4.1.2 Develop action plan for unsafe behaviors based on comments and feedback from cards.
- 1.4.1.3 Designate responsible parties and timeframes within the action plan.
- 1.4.1.4 Define who is responsible for action planning.
- 1.4.1.5 Ensure management support.
- 1.4.2 Action planning can occur at all levels from management to the field level.
- 1.4.3 Consider having only one or two action plans open at a time.
- 1.4.4 Refer to archived action plans for ideas for new action plans.
- 1.4.5 Consider defining what success is with each action plan – how do you know the action plan has done what it is supposed to do?

1.5 DATA COLLECTION

- 1.5.1 TERRY R PITT CONSTRUCTION has a process in place by which data can be collected from each observation. TERRY R PITT CONSTRUCTION will use this data to perform a trend analysis. This process will include direct observations of the affected employee's work behavior and will:
 - 1.5.1.1 Document safe and unsafe acts and behaviors from cards.
 - 1.5.1.2 Categorize behaviors for easier trending.
 - 1.5.1.3 Periodically complete a trend analysis, as appropriate, every six months (minimum).
 - 1.5.1.4 Define steps for communicating trend analysis to employees and management.
- 1.5.2 TERRY R PITT CONSTRUCTION will conduct observations in a manner that provides direct and measurable data.

1.6 FEEDBACK AND OBSERVATION

- 1.6.1 TERRY R PITT CONSTRUCTION will, upon completion of an observation, have the *observing employee* discuss with the *observed employee* the elements of the observation for purpose of obtaining feedback. Feedback will be conducted in a positive manner that reinforces safe behaviors. The observing employee will:

- 1.6.1.1 Review the observation with the observed employee.
- 1.6.1.2 Start with a positive comment – reinforce safe behaviors observed, first.
- 1.6.1.3 Describe/detail and discuss what was unsafe, as well as the consequences of unsafe behavior(s).
- 1.6.1.4 Ask for explanation/gain feedback from observed employee of unsafe behavior with open-ended questions.
- 1.6.1.5 Re-emphasize that there are no disciplinary consequences to the observed employee.

1.7 FOLLOW UP

- 1.7.1 Action plans are carried out over the course of a set time period. Follow up is necessary to ensure the closure of all actions listed with the action plan. The follow up process will include:
 - 1.7.1.1 Define a frequency for review for action plans with a minimum of every six months.
 - 1.7.1.2 Assign accountability for closeout of action plans within the organization.
 - 1.7.1.3 Archive action plans for a minimum of one year.
 - 1.7.1.4 Include observation program and action plans in internal audits.
- 1.7.2 Review archived action plans for lessons learned periodically over the course of the review period.
- 1.7.3 Consider defining what success is with the overall observation process – such as how to know if the observation program is working. Do not use quota for observation cards submitted as a success measure.
- 1.7.4 TERRY R PITT CONSTRUCTION will develop a process to ensure quality of its own observation process (ex. internal audits, records review, etc.). TERRY R PITT CONSTRUCTION will institute a continuous improvement process once areas of improvement are identified in the data collected through TERRY R PITT CONSTRUCTION’s BBS program.

1.8 TRAINING

- 1.8.1 The training program for employees affected by the BBS program will define who is trained and how much. General employee awareness training will ensure that all employees involved in the process are trained in the classroom and on the job.
- 1.8.2 Training will also include a review of these specific areas, at a minimum:

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- 1.8.2.1 The objectives of TERRY R PITT CONSTRUCTION's BBS program and the metrics used to evaluate effectiveness of the program.
- 1.8.2.2 How to conduct the observation.
- 1.8.2.3 Program objectives and incident metrics to determine if goals and objectives are met.
- 1.8.2.4 How to complete the observation form.
- 1.8.2.5 What do the behaviors mean?
- 1.8.2.6 Feedback training and role-playing (mentoring and coaching) between the observer and the employee being coached.
- 1.8.2.7 Employees should be aware that they might be observed any time they perform work activities.

1.8.3 TERRY R PITT CONSTRUCTION will ensure employee training includes elements pertaining to management, new employee, and refresher training. The company will also incorporate previous observation data information during refresher training.

