HSE Management System

Behavioral Based Safety Policy

REGULATORY STANDARD:

Prepared	Reviewed	Approved	Effective Date	Version No.
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Important Notice:

1. This procedure is a Controlled Document and shall not be amended without the authority of the Safety Specialist – North America.
2. Any queries or feedback concerning the contents of this Procedure should be addressed to the Safety Specialist – North America.
3. This document is rendered null and void upon print.

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ATTACHMENTS

1.0 PURPOSE

To establish a procedure for implementing the Behavior Observation Process and Last-Minute Risk Assessment Process (LMRA) at the project/facility level.

2.0 SCOPE

This procedure is applicable to Airswift projects/facilities.

3.0 DEFINITIONS

3.1 **CSM** – Construction Site Manager

3.2 **FM** – Facility Manager

3.3 **HSE** – Environmental, Safety, and Health

3.4 **HSEEP** – Environmental, Safety, and Health Execution Plan

3.5 **HSER** – Environmental, Safety, and Health Representative

3.6 **OSC** – Observation Steering Committee

4.0 REFERENCES

None

5.0 RESPONSIBILITIES

When an activity is defined for a certain position in this procedure, the responsibility may be performed by a designee.

5.1 **CSM/FM** – The CSM/FM has the overall responsibility for this procedure and is responsible for supporting it and for ensuring that all project/facility entities actively participate.

The CSM/FM is responsible for providing the personnel, facilities, and other resources necessary to effectively carry out this procedure.

The CSM/FM and the management team will lead by example, modelling the behavior expected from all employees performing work.

NOTE: This is an employee-owned process. It must be totally supported and championed by management. The primary objective must always be to provide behavior observation feedback and to identify and eliminate at risk work practices before an accident/incident occurs. It must be a proactive, positive process not associated with punitive punishment or individual report cards.

5.2 **HSE Representative** – The HSE Representative, in conjunction with the CSM/FM, is responsible for implementing and administering this procedure.

5.3 **Supervisor** – Supervision will be thoroughly familiar with this procedure and with their individual responsibilities regarding its implementation and enforcement. The contractor supervisor will discuss a Last-Minute Risk Assessment on a task that is about to be completed. This will occur with each of their crew members at a minimum of once per week.

5.4 **Employee** – Employees must know and understand the environmental, safety, and health requirements of this procedure that apply to the work they perform.

6.0 REQUIREMENTS

6.1 Process Initiation

6.1.1 The behavior observation process will not be initiated at the project/facility level until the regional HSE Services Manager, or their designee, and the CSM/FM have jointly developed an execution strategy for establishing the observation process on the project/facility. A thorough evaluation is necessary to determine the best approach for successfully implementing the process. For a step-by-step roll out and flowchart of the execution process **(see Exhibit A)**. A Last-Minute Risk Assessment (LMRA) is also required at the beginning of and throughout the performance of the work task and especially when the scope of the task changes. For guidance on a LMRA, a Go Card is included **(see Exhibit B)**. The LMRA discussions should be real time, at the job site, and involving the immediate task.

6.1.2 If the project/facility involves union labor, an up-front presentation will also be made to the trades' leadership to familiarize them with the process.

6.1.3 Upon completion of steps 6.1.1 and 6.1.2, a behavior observation team will be established to conduct systematic, organized, and behavioral observations to enable the project/facility to track and analyze how safely employees are working.

6.1.4 Observers can be selected from the hourly personnel.

6.1.5 The behavior observation team will:

- Develop a safe observation checklist based on work practices and conditions that could cause accidents, injuries, equipment, or property damage at the project/facility.
- Identify specific needs for employee coaching and HSE training.
- Provide feedback on the effectiveness of recent employee coaching and safety/health training.
- Emphasize appropriate on-the-spot feedback to encourage safe work practices and eliminate unsafe conditions.

6.1.6 The regional HSE Services manager or their designee will provide the initial training to the observers to kick off the process. As new observers rotate into the process, they will be required to attend observer training. Observer training will cover:

- Behavioral modification principles and theory
- Behavior observation process
- Positive reinforcement and communication
- Participation in field observations with a trained observer

6.1.7 The team will meet at least weekly to review observation results, develop recommendations for improving safety performance, and monitor progress toward achieving the elimination of all at-risk behaviors.

6.2 Observation Guidelines

6.2.1 Observer(s) will be required to perform job/task observations. The observer will be alert for employees performing safe and at-risk unsafe work practices that could cause injuries, illnesses, or equipment or property damage.

6.2.2 The required observation time will be determined by the size of the project/facility. Observation time, which can be spread throughout the week, is to be increased as activities increase.

6.2.3 As observers identify safe and at-risk (unsafe) work practices, the observer will document it on the Behavior Observation List. All items documented on the checklist will be discussed with the employee(s) being observed at the conclusion of the observation.

6.2.4 Completed Behavior Observation Checklists will be turned in to the HSE department for data compilation.

6.2.5 Data gathered will be compiled for discussion in the observers' weekly meeting. This meeting should be held prior to the weekly safety meeting so the information can be presented to the project/facility.

6.3 Recordkeeping/Data Results

6.3.1 All observation forms and results will be maintained in the HSE files. It is essential to make sure that observation forms are filled out according to the guidelines.

6.3.2 Reports and trend data will be produced utilizing Bechtel's observation data collection software application. The data will be discussed in staff meetings, progress review meetings, and employee meetings to make sure all employees are aware of the process and the findings.

6.4 Training

6.4.1 The observation process and LMRA process will be reviewed with all employees during induction and refresher training annually.

6.4.2 All managers and supervisors will attend training in order to achieve an understanding of the behavior observation process and the process implementation methodology and procedures. Training will cover:

- General overview of behavior-based safety management and safe behavior reinforcement.
- Understanding how to identify hazards associated with work activities or tasks.
- Understanding how to mitigate or eliminate the risk associated with the hazard.
- Shutting the job down if the risk/hazard cannot be mitigated or eliminated.

Exhibit A

BEHAVIOR OBSERVATION PROCESS
(EXECUTION STEPS AND FLOWCHART)

IMPLEMENTATION STEPS

1) Provide basic overview of philosophy and mechanics of BBS in Safety Leadership Workshop and with Site Management:

   - Understanding of process
   - Resources and time involved for start-up and maintenance
   - Determine contractor/area to pilot Observation Process
   - Develop/enhance implementation plan

2) Implement plan:

   - The first two steps can be done simultaneously
   - Identify a long-term project facilitator

3) Select the Observation Steering Committee (OSC) (natural leaders) from the crafts.

4) Establish or link to the Zero Accident Team, etc.

5) Train the general employee population through project-wide communication (incorporate into project's New Employee Induction).

6) Work with the OSC to define, prioritize and develop the Safe Behavior Checklist:

   - Review injury/illness trends (inception-to-date)
   - Develop Safe Behavior Checklist
   - Select the target behaviors to focus observations

7) Work with the OSC to define, prioritize and develop protocols for observations:

   - Define the observation strategy –area/group concept, number and frequency of observations
   - Reports
   - Communication strategy for data use

8) Work with the OSC to develop their observation skills

   - Mock observations (during training)
   - Group observations in field - initial
   - Single observations

9) Start Observations

   - Collect Data
   - Input Data

- Produce Reports
- Communicate data to supervisors and craft

10) Work with long-term facilitator who will coach and facilitate the project and OSC to maintain focus on priority observations and the process.

11) Turn the process over to the project/facility team and the project facilitators.

12) The Regional Manager of HSE services maintains contact and oversight.

Exhibit B

LAST-MINUTE RISK ASSESSMENT (LMRA) PROCESS
GO CARD

1. Job Preparation

- Does everyone understand English?
- What job steps are each of you going to do?
  - What is the procedure?
- When was the last time you performed the task?
  - What did you learn?
- Does everyone on location know what you are doing?
  - How does it affect them?
  - How will they affect you?
- What tools do we need and how will we inspect them?
- Do we have short service employees?
  - How are we going to manage?
- What PPE do we need for this job and do we have it?

2. Identify General Hazards

- What will cause you to **slip, trip** or **fall**?
- What will **sting** or **bite** you?
- How are you going to manage the **weather**?
- How will you **hurt** your **hands**?
- What else could **hurt** you?

3. Critical Hazards

- What will seriously **hurt you** or **KILL** you?
  - **What are you going to do about it?**
- What will **crush you**?
  - What are we going to **move**?
- How will you be **hurt** by **stored energy** (pressure, mechanical, electrical)?
  - How will it be **released**? Where?
- Where will you **fall from >4 ft**?
  - How do you know you are protected?
- Where will **hazardous/flammable gases** be released?

- How will **it ignite**?
- How will you be **exposed** (H_2S, LEL, Nitrogen)?

- What **permits** do you need?
- What else would seriously **hurt you** or **KILL** you?

DO YOU ALL AGREE? YOU ARE READY TO GO TO WORK.

Refresh Go Card if job scope changes in a way that can create a new hazard.

FINISH CARD

1. What went according to plan and what surprised us today?
2. What hazards did we miss and how did we adjust?
3. What did we have to “make do”?
4. Were our critical controls good enough?
5. Did we learn anything that should be shared with others?