

SECTION 2: Safety Accountability Policy

I. PURPOSE

This Safety Accountability Policy is designed to increase safety awareness, spell out disciplinary guidelines for unsafe work acts or conditions and enhance the overall effectiveness of the Company's Safety Process. The Company's basic philosophy is that all employees must be held accountable for their own safety and for the safety of those that report to them.

II. SCOPE

The Company has safe work rules that are described in the Company Safety Manual and Company Handbook. In addition, most of the Company's customers have their own safe work rules that apply to the project site. Neither the Company nor the customer's work rules can cover every possible unsafe work practice. Therefore, any unsafe act, whether a violation of the stated rules or not, may be subject to a Safety Coaching Plan as further explained below. The Company reserves the right to modify or amend this Policy at any time.

III. PROCEDURE

A. SAFETY COACHING PLANS

For every unsafe work act where safety accountability may be dispensed, the employee may receive a Safety Coaching Plan that details the unsafe work act and the level of discipline. Copies of the Safety Coaching Plan Form may go to:

- a) the employee's personnel file
- b) Safety Director
- c) Trade Manager (Union Hall)
- d) Office Manager/Administrator

The Policy has three levels of safety citations:

- **Level One (Coaching):** Employee is given a verbal or written coaching plan.
- **Level Two (Significant Injury Avoidance):** Employee is given a written Safety Coaching Plan and up to a five (5) day suspension without pay.
- **Level Three (Life Saving Absolutes):** Employee may be terminated and not eligible for rehire for a minimum of 12 months.

B. SAFETY COACHING PLAN ISSUANCE

Employees of the Company are expected to report unsafe work acts or conditions immediately to a supervisor or Safety Director. However, direct supervisors in conjunction with the Safety Directors have the responsibility for issuing a Safety Coaching Plan. In the case of a violation by a supervisor and/or a Safety Director, that person's direct supervisor or an officer of the Company shall be responsible for determining whether a violation occurred and issuing the Safety Coaching Plan.

C. SAFETY COACHING PLAN EXAMPLES

Violations that are subject to a Safety Coaching Plan include examples of unsafe work practices listed in the different levels below but also include policies and procedures in the client site-specific safety plan, the Company's safety manual, the federal, state and local code of regulations regarding occupational safety and health. The examples also provide appropriate discipline for a violation.

The Company maintains the right to review any unsafe act/condition and determine the appropriate penalty depending on the circumstances.

Level 1 (Coaching) Safety Coaching Plans (Verbal or Written) include, but are not limited to, unsafe work acts that have some or all of the following characteristics:

- (a) may or may not be intentional
- (b) are considered personal safe work practices
- (c) only puts the worker at risk of minor injury

Examples:

Severity Level	Coaching
1	• Failure to wear ANSI-rated safety glasses
1	• Failure to wear appropriate gloves, hard-hat, (bump-cap) and or other PPE
1	• Failure to wear hearing protection when required
1	• Failure to wear seatbelts
1	• Failure to use hands-free while driving on company time
1	• Failure to wear Personal Protective Equipment appropriately when required
1	• Failure to identify and abate an obvious hazard or danger before performing a task
1	• At fault auto incident resulting in minor property damage
1	• Supervision witnesses and/or condones an unsafe act or condition
1	• Supervision fails to enforce safe work rules
1	• Supervision knowingly fails to supply appropriate PPE

Level 2 (Significant Injury Avoidance) Safety Coaching Plans include, but are not limited to, unsafe work acts or conditions that have some or all of the following characteristics:

- (a) may or may not be intentional
- (b) are considered to have a greater probability of causing serious injury to the worker and those around them
- (c) are generally more willful in nature

Examples of such unsafe work acts that typically warrant up to a five (5) day suspension, beginning the next workday are:

Severity Level	Significant Injury Avoidance	Days off w/o pay for 1st Coaching Plan
2	• Failure to report any incident involving injury, property damage, or business interruption within 4 hours	Up to 5
2	• Working on an uninspected scaffold or the improper use of a scaffold, including scissor and aerial boom lifts	Up to 5
2	• Using hand or power tools without required guards or handles	Up to 5
2	• Failure to have a fully charged and inspected fire extinguisher during hot work	Up to 5
2	• At fault auto incident resulting in serious property damage or injury	Up to 5
2	• Unauthorized use of company vehicles	Up to 5
2	• Driving complaint from public & corroborated by the company GPS	Up to 5
2	• Improper use of a ladder	Up to 5
2	• Leaving a fire watch post during hot work	Up to 5
2	• Walking or standing under a suspended load	Up to 5
2	• Failure to have and/or follow an accepted crane lift plan by Safety Dept.	Up to 5
2	• Failure to follow written safety (hot work, confined space, etc.) permits	Up to 5
2	• Disabling or overriding safety devices	Up to 5
2	• Failure to identify, plan and protect employees from fall exposure	Up to 5
2	• Failure to follow proper hoisting and rigging practices	Up to 5
2	• Second Safety Coaching Plan for Level 1 unsafe work act/condition (where previous Coaching Plan was for a Level 1, within 12 months)	Up to 5
2	• Supervision witnesses and/or condones an unsafe act or condition; or fails to enforce safe work rules that is considered a Level 2 infraction and failing to take any action to stop it	Up to 5
2	• Supervision fails to correct a known hazard	Up to 5

Level 3 (Life Saving Absolutes) Safety Coaching Plans include, but are not limited to, unsafe work acts that have some or all of the following characteristics:

- (a) may or may not be intentional
- (b) are considered to have a high likelihood of causing serious injury to the worker and/or those around them
- (c) could cause serious property damage
- (d) are generally considered willful violations of safe work rules

Examples of such unsafe work acts or conditions that typically warrant immediate discharge are:

Severity Level	Life Saving Absolutes	
3	<ul style="list-style-type: none"> Exposure to an unprotected fall hazard above 6 feet including: <ul style="list-style-type: none"> Not tying off in an articulating boom lift, Working at or near an unprotected side or edge without a fall protection plan Not hooking off to a designed anchorage point 	Discharge
3	<ul style="list-style-type: none"> Working in an unprotected trench or excavation deeper than 5 feet <ul style="list-style-type: none"> Protection consists of using stable rock, benching, shielding, sloping or shoring 	Discharge
3	<ul style="list-style-type: none"> Dangerous acts involving a permit-required confined space <ul style="list-style-type: none"> Leaving an attendant position during an entry Entering a permit space without a permit Not testing the air prior or during an entry for O2, LEL, H2S and CO 	Discharge
3	<ul style="list-style-type: none"> Failure to follow pneumatic pressure testing procedures 	Discharge
3	<ul style="list-style-type: none"> Failure to apply or improper removal of Lock-Out Tag-Out 	Discharge
3	<ul style="list-style-type: none"> Failure to follow NFPA 70E PPE requirements while testing or working on energized equipment 	Discharge
3	<ul style="list-style-type: none"> Third Safety Coaching Plan for a Level 1 unsafe work act within 12 months 	Discharge
3	<ul style="list-style-type: none"> Second Safety Coaching Plan for a Level 2 unsafe work act within 12 months 	Discharge
3	<ul style="list-style-type: none"> Supervision knowingly witnesses and/or condones an unsafe act or condition; fails to enforce safe work rules, and/or directs an employee to perform a known unsafe work act that is considered a Level 3 infraction and fails to take any action to stop it 	Discharge

D. COMPANY DISCRETIONARY MEASURES

Where circumstances are so justified, the Company may decide to impose stiffer penalties from those listed herein, depending upon the nature of the circumstances involved in each individual case.

It is possible that an unsafe act/condition may also be a violation of another Company policy or a customer policy. In such situations, the Company may decide to apply the more stringent discipline policy and/or cumulative discipline of all applicable policies.

E. TRAINING

Re-training or additional training on the Safety Accountability Policy Requirements may be performed at defined intervals and when situations dictate.

IV. REFERENCES

Attachment 1 - Safety Coaching Plan Form

ATTACHMENT 1 – SAFETY COACHING PLAN FORM

Employee Name _____ Department _____

Employee's Title _____ Date of Meeting _____

Explain in detail the reasons for this meeting. Include specific examples of unacceptable actions and/or behaviors, the date(s) of the occurrence(s) and all pertinent details. (Use the reverse side, if necessary)

Explain why the actions and/or behaviors are unacceptable:

Instructions given to the employee to correct the unacceptable actions and/or behaviors:

Anticipated disciplinary action if there isn't improvement:

Dates, if any, of previous coaching and/or warnings and for what?

	Level 1 - Coaching	Level 2 – Significant Injury Avoidance	Level 3 - Life Saving Absolutes
ACTION TAKEN:	<input type="radio"/> Safety Coaching Plan	<input type="radio"/> Safety Coaching Plan <input type="radio"/> Suspension _____ Beginning Date _____ Return Date	<input type="radio"/> Termination _____ Effective Date

Employee Remarks:

Notice to the Employee:

If you fail to change the behaviors as indicated or if you are involved in other situations requiring additional formal discussions, you may be subject to corrective actions, up to and including termination. If you improve your work performance and/or change the behaviors as indicated above, this notice will not be used in further counseling sessions after a period of 12 working months. A copy of this document will be placed in your personnel file. Your signature below indicates you have read and understand this notice.

Employee Signature: _____ Supervisor Signature: _____ Safety Director Signature: _____