NEWKIRK ELECTRIC ASSOCIATES, INC.

Behavior Based Safety

| Index | Section |
|------------------|---------|
| Purpose | 120.1 |
| Scope | 120.2 |
| Requirements | 120.3 |
| Responsibilities | 120.4 |
| Training | 120.5 |

Section 120-Rev 1 Behavior Based Safety Newkirk Electric Associates | 1 of 5

120.1 PURPOSE

A. The Newkirk Electric Associates Behavior Based Safety (BBS) initiative is an education and observation process used to improve safety and reduce risk in the workplace. This process uses a proactive approach and is intended to communicate to employees the elements and the procedures of Behavior Based Safety that will assist in reducing at risk behaviors which in turn reduces injuries in our workplaces.

120.2 SCOPE

A. Newkirk Electric Associates BBS applies to all staff. Employees are permitted to participate in BBS initiatives already in place at customer locations if required by the customer. Employees are requested to participate in Behavior Based Safety process and follow the process guidelines.

120.3 REQUIREMENTS

- **A.** Safety awareness principles are the foundation of the Newkirk Electric Associates Behavior Based Safety process. The key concepts teach employees to recognize when they may be in one of the following states:
 - (1) Rushing
 - (2) Frustration
 - (3) Fatigue
 - (4) Complacency (which can cause or contribute to these critical errors)
 - (5) Eyes not on task
 - (6) Mind not on task
 - (7) Line of fire
 - (8) Loss of balance/traction/grip (which in turn increase the risk of injury.)
- **B.** Pre-task Analysis is a process to evaluate the work environment by performing a Job Safety Analysis (JSA) of each job. The purpose of which is to eliminate or control all hazards that may be encountered to complete the job. This process is included in the Behavior Based Safety process to establish the correct habits and work procedures in order to reduce at-risk behaviors.
- **C.** The observation process is designed to raise safety awareness and provide a feedback mechanism for management to make changes in design, process or procedure in order to reduce at-risk behaviors. The key to this process is raising awareness of behavior through observation and feedback. The process has three key elements:
 - (1) Conducting Observations of Employees Work Behavior
 - (a) Observations provide direct, measurable information on employee work practices identifying both safe and unsafe behaviors. The process starts with the observation of workers - fellow employees, other contractor employees and customer employees as they perform their tasks. Observers collect information about worker performance and provide feedback via the observation card. The emphasis is not on who was observed but rather what behavior was observed.
 - (b) During the observation the observer records their findings on the BBS Observation Form. Items to be observed include but are not limited to:
 - (i) Personal Protective Equipment
 - (ii) Procedures / Methods

- (iii)People
- (iv)Work Environment
- (v) Equipment
- (c) Upon completion of an observation the observer is expected to have a discussion with the observed to get feedback. The observer will:
 - (i) Review the observation with observed employee.
 - (ii) Start with a positive comment.
 - (iii)Reinforce safe behaviors observed first.
 - (iv)Describe and discuss unsafe behaviors observed.
 - (v) Solicit from observed employee explanation of his/her unsafe behavior with openended questions.
 - (vi)Re-emphasize no consequence to observed employee.
- (d) Documenting feedback allows workers to assess what should be repeated and what should change to reduce risks in the workplace.
- (2) Collection of Data and Performing Trend Analysis
 - (a) Individual departments, as well as Newkirk Electric Associates as a whole, will compare these measurements and track these results by an acceptable method so that numerical and statistical comparisons can be made over time.
 - (b) BBS Observation Forms are forwarded to the corporate safety manager for input into the BBS database. Reports are generated and forwarded to management. Newkirk Electric Associates will collect data and performing trend analysis based on the information.
- (3) Elements of an Action Plan After the Trend Analysis is Completed
 - (a) Once trend analysis is complete, appropriate action plans shall be developed to address unsafe behaviors. Action planning will include:
 - (i) Evaluate unsafe behaviors from trend analysis and prioritize.
 - (ii) Develop action plan for unsafe behaviors based on comments and feedback from data sheets.
 - (iii)Designate responsible parties and timeframes within the action plan.
 - (iv)Define who is responsible for action planning.
 - (v) Ensure management support.
- (4) Action Plan Follow Up
 - (a) All action plans shall be arranged by a set time period. To ensure effectiveness of the BBS follow-up is necessary to ensure the closure of all actions listed. The follow-up process will include:
 - (i) Periodic review of action by the safety manager, senior management and employees.
 - (ii) Assign accountability for closeout of action plans within Newkirk Electric Associates.
 - (iii) Document archiving of action plans with completed action items.

120.4 RESPONSIBILITIES

- A. Oversight
 - (1) The manager/supervisor has these oversight responsibilities:
 - (a) Coach observers and develop action plans to ensure continuous improvement.

- (b) Ensure that all employees are trained on the Behavior Based Safety elements.
- (c) Maintain communication with workforce by channeling information in a timely manner (feedback).
- (d) Collect and review process modification change requests from employees.
- (e) After reviewing and giving feedback the BBS/JSA cards should be forwarded to the corporate safety director for data entry.
- (2) Each employee plays a specific role in the Behavioral Based Safety process. These roles include observee, observer, supervisor, manager and safety manager.

B. Person being observed

- (1) Be willing to be observed.
- (2) Be open and cooperative.
- (3) Avoid being defensive.
- (4) Participate in problem-solving meetings.
- (5) Be familiar with the Behavior Based Safety process.

C. Person performing the observation

- (1) Learn the Behavior Based Safety process and the benefits of reducing at-risk behaviors.
- (2) Promote the Behavior Based Safety process.
- (3) Make observing proactive.
- (4) Be open to coaching.
- (5) Be courteous and helpful.
- (6) Assist workers by offering suggestions to safely perform a task or help them with a task if necessary.
- (7) Communicate with the workers being observed.
- (8) Give constructive feedback after observations.
- (9) Stress the safe behaviors before the at-risk behaviors.
- (10)Offer and work towards solutions of problems found.
- (11)Record a comment for every recorded "at-risk" to include what and why. Make quality observations, concentrating on quality comments.

D. Manager

- (1) Actively promote and participate in the behavior safety process by supporting the goals and objectives of the Behavior Based Safety process.
- (2) Ensure that all employees are aware of what is expected of them regarding the BBS process.
- (3) Encourage employees to participate in observations so that incidents/injuries are reduced in the workplace.
- (4) Provide necessary resources to keep process productive.
- (5) Attend safety meetings and offer feedback on areas of improvement.

E. Supervisor

- Actively promoting and participating in the Behavior Based Safety process by reviewing BBS
 Observation Forms turned in at least weekly and giving feedback, completing corrective actions
 needed, etc.
- (2) Refraining from using data from the Behavior Based Safety process in a punitive manner.

- (3) Assisting in problem solving and completing corrective actions in a timely manner.
- (4) Understanding the behavior safety process and the benefits of reducing at-risk behaviors.

F. Safety Manager

- (1) Support the goals and objectives of the Behavior Based Safety process.
- (2) Encourage, promote, provide technical support and assist in acquiring the resources needed for the Behavior Based Safety process.
- (3) Address the concerns and suggestions of field personnel.
- (4) Collect all observation data cards.
- (5) Enter data into BBS database.

120.5 TRAINING

- **A.** Training on the observation process will include how to conduct the observation, how to complete the observation form, what do the behaviors mean, feedback training and role play (mentoring and coaching) and employees should be aware they may be observed at any time.
- **B.** Training will include:
 - (1) Program objectives and incident metrics reviewed.
 - (2) How to conduct the observation.
 - (3) How to complete the observation form.
 - (4) Explanation of what the behaviors mean.
 - (5) Feedback training and role play (mentoring and coaching).
 - (6) Employees should be aware they may be observed at any time.