1 Purpose/Scope:

The company’s Behavior Based Safety 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.

This Procedure applies to management, shop craftsmen, field craftsmen and offshore craftsmen. Employees are permitted to participate in Behavior Based Safety initiatives already in place at customer locations if required by the customer. Observations provide direct, measurable information on employees’ work practices identifying both safe and unsafe behaviors.

2 Responsibilities:

2.1 Responsibilities:

2.1.1 Managers/Supervisors are responsible to ensure that all employees are trained on the company’s Behavior Based Safety elements.

2.1.2 Employee’s are encouraged to participate in Behavior Based Safety process and follow the process guidelines.

3 Requirements:

3.1 Safety awareness principles are the foundation of the Company’s Behavior Based Safety Process. The key concepts teach employees to recognize when they may be in one of the following states:

- Rushing
- Frustration
- Fatigue
- Complacency, (which can cause or contribute to these critical errors)
- Eyes not on task
- Mind not on task
- Line of fire
- Loss of balance/traction/grip (which in turn increase the risk of injury.)
The goal is to learn how to recognize these states and apply techniques to avoid the critical errors. The company will measure and track results so that numerical and statistical information can be made over time.

Once trend analysis is complete, appropriate action plans shall be developed to address unsafe behaviors.

Action planning will include:

- evaluating unsafe behaviors from trend analysis and prioritize,
- developing action plans for unsafe behaviors based on comments and feedback from data sheets,
- designating responsible parties and timeframes within the action plan, defining who is responsible for action planning, and ensuring management support.

3.2 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.

3.3 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.

3.3.1 The Observation process has three key elements:

- **Observation and Feedback:**
  
  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 was observed. Items to be observed include but are not limited to:
  
  - Personal Protective Equipment
  - Procedures / Methods
  - People
  - Work Environment
  - Equipment

  This first step reinforces safe work behaviors and facilitates the collection of data about why at-risk behaviors are performed. Documenting feedback allows workers to assess what should be repeated and what should change to reduce risks in the workplace.

- **Analysis and Action Planning:**
  
  Reviewing the cards collected enables the manager/supervisor to reinforce successes and identify areas for improvement in a timely manner (feedback to employees must be given at least weekly...no
longer than a calendar month – per individual and/or per group – usually at the weekly or monthly safe operations meeting).

- **Data Management:**
  The corporate safety director is responsible for inputting data into the BBS database.

- **Corrective Action Plan Developed by Corporate Safety Director:**
  
  ✓ In developing a corrective action plan, observations and comments are analyzed to determine contributing factors. Corrective action item(s) are then implemented to address and/or correct the behavior(s) or unsafe condition(s) identified on observation cards for any observations that have a score of 94% or lower for three consecutive months.

  ✓ Corrective actions completed should be noted (documented) on a corrective action spreadsheet and kept on file.

3.4 The Company’s Behavior Based Safety process administration responsibilities.

3.4.1 Oversight:

The manager/supervisor has these oversight responsibilities:
- Coach observers and develop Corrective Action Plans to ensure continuous improvement.
- Maintain communication with workforce by channeling information in a timely manner (FEEDBACK).
- Collect and review process modification change requests from employees.
- After reviewing and giving feedback the BBS/JSA cards should be forwarded to the corporate safety director for data entry and corrective action plans.

The company’s Behavior Based Safety is a continuous improvement process.

3.4.2 Management, Shop Craftsmen, Field Craftsmen and Offshore Craftsmen Roles:

Each employee plays a specific role in the company’s Behavioral Based Safety process. These roles include observee, observer, supervisor, manager and safety director.

- **Observee:**
  (Person being observed) should do the following:
  ✓ Be willing to be observed.
  ✓ Be open and cooperative.
  ✓ Avoid being defensive.
  ✓ Participate in problem-solving meetings.
  ✓ Be familiar with the Behavior Based Safety process.
Observer:
(Person performing the observation) should do the following:

- Learn the Behavior Based Safety process and the benefits of reducing at-risk behaviors.
- Promote the Behavior Based Safety process.
- Make observing proactive.
- Be open to coaching.
- Be courteous and helpful.
- Assist workers by offering suggestions to safely perform a task or help them with a task if necessary.
- Communicate with the workers being observed.
- Give constructive feedback after observations.
- Stress the safe behaviors before the at-risk behaviors.
- Offer and work towards solutions of problems found.
- Record a comment for every recorded “at-risk” to include what and why. Make quality observations, concentrating on quality COMMENTS.

Manager:
The manager has the following responsibilities:

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

Supervisor:
The supervisor supports the goals and objectives of the Behavior Based Safety process by doing the following:

- Actively promoting and participating in the Behavior Based Safety process by reviewing cards turned in at least weekly and giving feedback, completing corrective actions identified by the corporate safety director, etc.
- Refraining from using data from the Behavior Based Safety process in a punitive manner.
- Assisting in problem solving and completing corrective actions in a timely manner.
- Understanding the behavior safety process and the benefits of reducing at-risk behaviors.

Safety Director:
The safety director has the following duties:

- Support the goals and objectives of the Behavior Based Safety process.
Encourage, promote, provide technical support, and assist in acquiring the resources needed for the Behavior Based Safety process.
Address the concerns and suggestions of field personnel.
Collect all observation data cards.
Enter data into BBS database.
Prepare and distribute Corrective Action reports as deemed necessary.

3.5 Training

3.5.1 Training will include:
- Program objectives and incident metrica reviewed
- How to conduct the observation
- How to complete the observation form
- What do the behaviors mean
- Feedback training and role play (mentoring and coaching)
- Employees should be aware they may be observed at any time.

4 References:
None.

5 Exhibits:

Exhibit A-1 - JSA / BBS Observation Sheet
**Exhibit A-1**  
**JSA / BBS Observation Sheet**

**JSA / BBS REPORT**

<table>
<thead>
<tr>
<th>Field</th>
<th>Offshore</th>
<th>Inland Waters</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>NAME:</th>
<th>CUSTOMER:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>DATE:</th>
<th>LOCATION:</th>
</tr>
</thead>
</table>

☐ I understand I may STOP any task I believe is unsafe and shall report all injuries/shots hits that happen on the job

☐ Nearest Alarm/Safety Shower  ☐ Environmental/Concerns Addressed  ☐ Lines Drained/Purged

☐ Evacuation Point(s) Identified  ☐ Emergency # and/or Alarm Understood  ☐ Drain Pans/Absorbant Available

**PERMIT(s) REQUIRED:**  ☐ Safe Work  ☐ Hot Work  ☐ Confined Space  ☐ LD/TO  ☐ Other:

<table>
<thead>
<tr>
<th>TASK(s) TO BE COMPLETED</th>
<th>HAZARD(s) IDENTIFIED</th>
<th>MITIGATION ACTION(s) TO TAKE</th>
</tr>
</thead>
</table>

**FALL PROTECTION PLAN REQUIRED:**  ☐ YES  ☐ N/A (describe rescue plan)

**Tailgate Safety Meeting Topic:**

Signature(s) of Personnel Participating In This JSA:

☐ Short service (SS) employee(s):  ☐ Each SS employee assigned a

**BEHAVIOR BASED SAFETY (BBS) OBSERVATION**

<table>
<thead>
<tr>
<th>Safe</th>
<th>Concer</th>
<th>Personal Protective Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safe</td>
<td>Concer</td>
<td>Body Position / Mechanics</td>
</tr>
<tr>
<td>Safe</td>
<td>Concer</td>
<td>Following Safety Procedures</td>
</tr>
<tr>
<td>Safe</td>
<td>Concer</td>
<td>Housekeeping / Slip-Trip Hazards</td>
</tr>
<tr>
<td>Safe</td>
<td>Concer</td>
<td>Tools &amp; Equipment (being used correctly)</td>
</tr>
<tr>
<td>Safe</td>
<td>Concer</td>
<td>Vehicles &amp; Mobile Equipment</td>
</tr>
<tr>
<td>Safe</td>
<td>Concer</td>
<td>Environment</td>
</tr>
</tbody>
</table>

**COMMENTS:** (Concerns **MUST** be addressed below)

☐ Because I care, I will STOP unsafe acts/conditions I observe to protect the safety and well-being of my fellow workers, customer and other contractor employees, etc. To address any safety concern I will consult with my manager/supervisor first, then if necessary, contact the corporate safety director (504) 400-1058. I understand these 4 states: RUSHING • FRUSTRATION • FATIGUE • COMPLACENCY increase the risk of injury to myself and others.