

# FirstSTEP: Your Safety Roadmap Starts Here...

Dear ABC Member,

Starting a safety program can be a daunting task. That's why each year, ABC's National Environment, Health and Safety Committee sends out its STEP (Safety Training Evaluation Process) program. STEP is a proven and valuable resource designed specifically to support ABC members in the development and continued improvement of safety and training efforts, with a collective goal of ensuring continued worker wellbeing and health.

But for some, STEP can be more like a big *JUMP*. That's why we created FirstSTEP. If you are a smaller contractor that wants to "start somewhere" with safety, then this tool was developed for you! It is our committee's hope that FirstSTEP will get your program off the ground and enable you to make a smooth transition into STEP next year, where even greater safety benchmarking and improvement tools await.

You will notice that this road map gives you some very basic components to consider as you work on constructing the foundation of your safety program. For best results, we encourage you to concentrate on building the program around your company's culture, the way <u>YOU</u> do business and the way your employees approach their jobs. While these components may be universal, there is no single right way to integrate them into an organization. The only true "right way" is *your* way. So make use of resources available, but take the little extra time needed to make them truly yours.

Along the way, you will undoubtedly seek help and guidance. Your local ABC Chapter can provide you with the resources and training you and your employees may need to cultivate your program into achieving desired results. While your first stop should be your local ABC Chapter, you may also find additional resources through your workers compensation insurer, local OSHA office/OSHA Consultation Program, State Workers Comp Fund, video libraries/vendors, the Internet or even consultants.

Congratulations on taking this "FirstSTEP"! As you undoubtedly know, the progress you make will bring returns many times over for your business and your employees alike. Some returns will come quickly, such as reduced injuries, improved productivity and stronger OSHA compliance. Other returns will continue to get better with time, such as gaining a competitive advantage in your market, lowering workers comp costs, preventing costly OSHA fines and pre-qualifying for profitable work.

We greatly appreciate your participation in our FirstSTEP program and would like to recognize your company for its efforts. Please log on to <a href="https://www.abc.org/firststep">www.abc.org/firststep</a> so to download the FirstSTEP Evaluation Form; be sure to submit to your local ABC Chapter in order to receive your "STEP PARTICIPANT" certificate!

Again, thank you and best wishes for continued safe and successful projects!

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### **COMPANY INFORMATION**

| Company Name:                               |                                 |  |
|---------------------------------------------|---------------------------------|--|
| Address:                                    |                                 |  |
| City:                                       |                                 |  |
| ABC Chapter:                                |                                 |  |
| Contact Name:                               |                                 |  |
| Email:                                      |                                 |  |
| Primary six-digit NAICS Code (as entered in | your OSHA Form 300A): <b>23</b> |  |

| NAICS<br>Code | SIC Code   | NAICS Category                                                     | BLS Average Incidence<br>Rate |
|---------------|------------|--------------------------------------------------------------------|-------------------------------|
| 236110        | 1521, 1522 | Residential Building Construction                                  | 3.6                           |
| 236115        | 1521       | New Single-Family Housing Construction (except Operative Builders) | 3.6                           |
| 236117        | 1531       | New Housing Operative Builders                                     | 3.6                           |
| 236118        | 1521       | Residential Remodelers                                             | 3.6                           |
| 236210        | 1541       | Industrial Building Construction                                   | 3.1                           |
| 236220        | 1542       | Commercial and Institutional Building Construction                 | 3.1                           |
| 237110        | 1623       | Water and Sewer Line and Related Structures Construction           | 3.7                           |
| 237120        | 1623       | Oil and Gas Pipeline and Related Structures Construction           | 1.1                           |
| 237130        | 1623       | Power/Communication Line and Related Structures Construction       | 3.0                           |
| 237210        | 1629       | Land Subdivision                                                   | 2.3                           |
| 237310        | 1611, 1622 | Highway, Street, and Bridge Construction                           | 4.1                           |
| 237990        | 1629       | Other Heavy and Civil Engineering Construction                     | 2.4                           |
| 238110        | 1771       | Poured Concrete Foundation and Structure Contractors               | 4.9                           |
| 238120*       | 1791       | Structural Steel and Precast Concrete Contractors                  | 5.3                           |
| 238130        | 1751       | Framing Contractors                                                | 3.7                           |
| 238140        | 1741       | Masonry Contractors                                                | 3.3                           |
| 238150        | 1793       | Glass and Glazing Contractors                                      | 5.7                           |
| 238160        | 1761       | Roofing Contractors                                                | 4.3                           |
| 238170        | 1761       | Siding Contractors                                                 | 4.6                           |
| 238190*       | 1741, 1742 | Other Foundation, Structure and Building Exterior Contractors      | 2.8                           |
| 238210        | 1731       | Electrical Contractors and Other Wiring Installation Contractors   | 3.0                           |
| 238220        | 1711       | Plumbing, Heating, and Air Conditioning Contractors                | 4.8                           |
| 238290        | 1796       | Other Building Equipment Contractors                               | 2.5                           |
| 238310        | 1742       | Drywall and Insulation Contractors                                 | 4.2                           |
| 238320        | 1721       | Painting and Wall Covering Contractors                             | 1.7                           |
| 238330        | 1752       | Flooring Contractors                                               | 3.7                           |
| 238340*       | 1743       | Tile and Terrazzo Contractors                                      | 3.2                           |
| 238350        | 1751       | Finish Carpentry Contractors                                       | 3.2                           |
| 238390        | 1751       | Other Building Finishing Contractors                               | 4.6                           |
| 238910        | 1794       | Site Preparation Contractors                                       | 2.9                           |
| 238990        | 1799       | All Other Specialty Trade Contractors                              | 3.5                           |

<u>Please complete and mail to your local ABC Chapter in order to receive your STEP Participant certificate.</u> ABC Chapter information can be found at www.abc.org/chapterlocator.aspx

## FirstSTEP: Your Safety Road Map Starts Here...

#### 1. EMPLOYER LEADERSHIP & SUPPORT

<u>Commit to understand the value of safety</u> – Safety helps your employees keep the promise they made to make it home tonight, it reduces losses (accidents, OSHA fines, legal fees, lost production, insurance claims, etc.) and is necessary to meet your OSHA/regulatory obligations.

<u>Understand that safety is good business</u> – Learn about your key safety-related numbers and what they represent. Know your mod factor and loss ratio – these are important as they play a key role in what you pay for workers compensation insurance and your bonding ability. Know your OSHA rates and OSHA citation history – these play a role in determining whether or not your company meets pre-bid safety qualification criteria (most good, profitable jobs require this information).

<u>Prepare to make reasonable investments in safety</u> – Safety does not have to bankrupt you. But understand that reasonable investments in time, equipment and training will be needed. Not everything can be done at once, so prioritize needs and plan accordingly. Remember that OSHA requires employers to pay for most PPE (personal protective equipment – safety glasses, hardhats, ear plugs, respirators, etc.).

"Commitment to Safety" statement — Write a brief letter to your employees explaining why safety is important to you personally. Commit to providing reasonable resources for safety training and equipment so that the program can achieve its ultimate goals — to protect employees, keep the company profitable & competitive, and meeting its regulatory obligations. Make it known that everyone in your company will be held equally accountable for safety performance and will be held to established safety rules. When finished, take time to go over this letter personally with your employees so they understand your sincerity. Then, post it and make it page #1 in your written safety policy.

<u>Safety coordinator</u> – It will be difficult for you, as a business owner, to manage safety alone. Assign a person to coordinate your safety efforts. Choose a person who works well with your people and is respected by them. Help him/her to succeed by asking what training or courses will be helpful and be as flexible as you can so there is reasonable opportunity to develop your program and be successful.

<u>Support your program</u> – Telling your employees to "just be safe" doesn't cut it for a safety program. You'll need to participate in your program and, understanding that your time is precious, there are innovative ways to support it:

- Attend safety meetings/training when your schedule allows. If opportunity arises, deliver a toolbox talk to your crew(s) personally.
- Equally enforce the safety rules you have set for your company.
  No exceptions.
- Make sure your supervisors and PM's understand the importance that you place on safety and see that they meet your expectations.
- Give a personal "Thank you" to those who are trying. Give a personal "It's time to get on board" to those who are not.
- Commit reasonable financial, human & organization resources for safety initiatives.
- Integrate safety into your other organizational processes (planning, purchasing, marketing, bidding...). Promote your safety program and its accomplishments within your company and to your customers, the public, insurance company and, when need arises, to government agencies.

#### 2. EMPLOYEE COMMUNICATION & INVOLVEMENT

<u>Effective communication</u> – Share safety information & "lessons learned" (from investigations or safety inspections) with your employees. Determine which medium is right for your company – postings, paycheck stuffers, group meetings, company website...

<u>Employee participation</u> – Consider ways that employees can actively play a role in your program's development. Program participation will help your safety coordinator and, more importantly, create a broader ownership of your program and its initiatives.

<u>Supervisory meetings</u> – Begin meeting with your supervisory personnel periodically to review and share safety-related issues (accidents, recurring safety problems, OSHA inspection, new policies, equipment/supply needs, concerns, etc.). This not only drives home the importance of safety in your company, but also helps to keep everyone on the same page with pertinent information. Monthly meetings would be great—quarterly at minimum (Note that these meetings also provide an opportunity for your supervisory & key people to learn a little about how safety performance directly equates to the company's bottom line.)

<u>Annual employee performance reviews</u> – If you conduct annual employee reviews, make sure that safety performance plays a meaningful part in it. If you don't do reviews, consider how to tie safety performance into employee evaluations, raises or bonuses.

#### 3. WRITTEN POLICIES & PROGRAMS

Get the basics in place. Some nice resources are available, but don't just take a program off of the Internet and slap your name on it. Rather, use it as a starting point and make revisions so that the document speaks <u>your language</u>, is usable and does not promise anything you don't intend to do.

<u>Basic written safety policy & rules</u> – Address the following items as a starting point-you can always add to your policy later. In fact, an annual review helps to assure that your safety rules remain pertinent and accurately reflect company policy and expectations.

- Commitment to Safety statement (see "Employer Leadership")
- Purpose of your safety policy
- Employee safety expectations, accountability & disciplinary action
- Incident reporting, investigation & follow-up
- General emergency preparedness & response
- Safety rules PPE, injury prevention & OSHA compliance

<u>Policy rollout</u> – Present your written safety policy to employees when it is finished so they know what is expected of them and can ask questions. Hold subcontractors accountable to it.

<u>**OSHA-required programs**</u> – Determine which OSHA-required written programs you need. You may need help, but many sample programs and resources are available online. See box on next page.

<u>Safety-related forms</u> – Assemble necessary safety forms – Incident Report, Jobsite Safety Inspection, OSHA Forms 300 & 300A injury/illness recordkeeping forms, etc.

<u>Substance Abuse Policy</u> – If you don't already have one, it is time to institute a substance abuse policy that includes drug & alcohol testing (DOT, pre-hire, post accident, reasonable suspicion and/or random). Download one at <u>www.drugfreeconstruction.org</u>. Schedule supervisor training and make employee help resources available. You will want to inform everyone of this policy at least 60 days in advance of rollout.

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#### 4. TRAINING

<u>Toolbox talks</u> – If you're not already doing these, it's time to start. Weekly talks are best, but if nothing else, monthly talks will help to get a continual message of safety out to everyone. These also serve as a very basic level of safety training and education.

<u>Safety training plan</u> – Identify basic safety training needs (who needs what and when?), then prioritize and put together a tentative schedule.

<u>Supervisor training</u> – Your supervisory personnel should go on to complete an OSHA-10 or OSHA-30, as well as 1st Aid/CPR/AED, incident investigation and relevant competent person training.

<u>Orientation</u> – Assemble a short outline to follow for safety orientation of new hires. Include:

- Explanation of your safety commitment & expectations.
- · Employee's safety responsibilities.
- PPE (personal protective equipment) expectations.
- Review key workplace safety rules.
- A basic level of construction safety training (video, PowerPoint, jobsite visit, etc.) that explains primary hazards employee may encounter and how to protect him/herself.
- Review of key safety information (MSDS, container labels, safety information, 1st aid kits, hazard reporting, injury/emergency reporting, reporting problems/concerns, etc.).
- Assign a safety mentor to look after and help new hire throughout probationary period.

#### **BASIC WRITTEN PROGRAMS**

- Hazard communication
- Lockout/tagout
- Respiratory protection
- Confined space entry
- Bloodborne pathogens
- Emergency action plan
- Fire prevention plan
- Lead/asbestos work
- Hot work

### **SAFETY TRAINING TOPICS**

- Fall protection & prevention
- PPE & respirator wearer
- Hazard communication
- Excavation/trenching
- Jobsite electrical safety
- · Lockout/tagout & arc flash
- Scaffolding
- Scissors & boom lift operator
- Ladder safety
- Emerg. preparedness/response
- First aid/CPR/AED
- Bloodborne pathogens
- Fire prevention & protection
- Tool safety
- Confined space entry
- Temp traffic control/flagging
- Hot work
- Lead or asbestos
- Forklift &/or skid steer operator
- Heavy equipment operator
- Crane operator
- Rigging & signalperson
- Driver safety; DOT compliance

#### 5. OTHER IMPORTANT SAFETY TOOLS

<u>Worksite safety inspections</u> – Institute periodic worksite safety inspections to determine:

- Is program being taken seriously?
- Where are our needs & problem areas (before incidents occur)?
- What training is needed?

This gets employees involved in your program. Have them do the walk-through (with/without your safety coordinator) or simply ask for their input during the inspection. Always review findings with site supervisor at end of inspection and make sure that preventive actions are being taken to correct any identified concerns. Work toward having your supervisory personnel turnin periodic safety inspection reports.

 $\underline{\textit{Incident investigation}}$  – Establish the basics of an incident investigation program.

- When & how are incidents to be reported?
- How & who documents & investigates incidents? Form to use?
- How, to whom & when are investigation reports to be submitted?
- Expectations for determining & enacting preventive actions.

Also, start looking at the types of accidents you have had over the past few years. Sit down with your insurer and look at your workers comp claims loss runs, incident reports, etc. Identify policies, equipment or training needed to prevent these.

<u>Safety pre-planning</u> – Take a look at the types of work you do that can cause serious accidents. Begin to identify policies or training needed to prevent accidents associated with these activities. A pre-work safety checklist for supervisory personnel can help to make sure necessary safety equipment makes it to the job, as well as provide a list of items requiring some pre-thought (plans for emergencies, fall protection, cave-in protection, power lines, crane operations, confined space entry, lockout/tagout, live electrical work, falling objects...).

**Recordkeeping** – You will want to start maintaining the following records (if you don't already):

- OSHA #300 & #300A logs (if you had more than 10 employees last calendar year)
- Safety meeting, training & toolbox talks (names of attendees, date, instructor name & outline of training content)
- Regulatory records (OSHA, DOT, EPA you may need to seek assistance with this)

<u>Program review & improvement</u> – Take the time to annually review your program. What is working and what is not? Where must you make improvements? Time to add/revise safety rules? Who needs to be thanked? Who needs a kick in the pants?