

Management Leadership and Employee¹ Involvement

Begin demonstrating visible, serious, and committed safety and health leadership by publicly accepting ultimate responsibility for safety and health in the total company and taking other appropriate actions to begin developing a culture, creating systems, and establishing policies and procedures that support safe and healthy work environments on all work sites.

Management Commitment

Actions to Achieve Desired Outcomes

1. **Safety and Health Vision Statement.** Develop, issue, and communicate a Safety and Health Vision Statement (*i.e.*, defining where the company wants to be). This Vision statement should address the company's desire to participate in BEST and ultimately, to achieve BEST performance and approval. This process may include involving permanent employees in the development of these documents.
2. **Safety and Health Mission Statement.** Develop, issue, and communicate a Safety and Health Mission Statement (*i.e.*, what the company commits to doing).
3. **Leadership.** Company establishes a policy requiring managers to participate and demonstrate leadership in safety and health program activities. Managers set an example and behaviors that demonstrate a commitment to safety and health, such as attending training, participating in planning meetings, wearing personal protective equipment, encouraging employees to report hazards, injuries and illnesses, enforcing the "if it's not safe, we're not doing it" principle, and performing other safety and health-related actions that are required of employees.
4. **Adequate resources and safety and health integration.** Company commits adequate resources for all safety and health requirements, including a plan for covering typical safety and health expenditures, as well as unusual, high risk, or emergency expenditures such as requirements for prompt correction of uncontrolled hazards (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene, ergonomic, etc., issues). Commit and ensure utilization of adequate resources to achieve at least the minimum outcomes specified for this BEST Level. Take management action to begin integrating safety and health into other aspects of planning, such as planning for new equipment, processes, building materials, etc. Company establishes a policy/requirement that safety and health will be integrated into the overall planning and budgeting processes.
5. **Safety and health targets and objectives.** Establish, document, and communicate to employees the annual safety and health targets and objectives that are clear, attainable, measurable, and relevant to bringing about a safe and healthy work environment, as well as the policies and procedures that will help achieve these targets and objectives. Targets should be based on outcome of an initial survey and a trend analysis. Establish a policy/requirement that key subcontractors will develop their targets and objectives supportive of the company targets in an equivalent manner.
6. **Clear lines of communication with employees and employee access.** Take action to establish clear lines of communication with employees and ensure that they have reasonable access to senior management with regard to safety and health issues. Address issues of worker language barriers by providing safety and health information in languages spoken and understood by workers.

¹ The term "employee" is used in this document to refer to all types of employees, including managers, supervisors, and non-supervisory employees, whether full-time, part-time, permanent, or temporary.

7. **Clear responsibilities, authority, and accountability for safety and health.** Clarify the safety and health responsibilities of each company employee.
 - a. Identify who will be responsible for achieving safety and health targets and objectives.
 - b. Identify specific persons to be accountable for meeting safety and health targets, including, at a minimum, managers, supervisors, and specific safety and health staff; assign adequate authority, as appropriate to their level of responsibility; and explain their accountability and authority to all employees.
 - c. Develop a safety and health accountability plan to hold managers, supervisors, and non-supervisory employees accountable for meeting their responsibilities through a documented performance standards and appraisal system.
 - d. Establish a policy/requirement that key subcontractors will adopt the company process for accountability plans and defining responsibilities or establish equivalent processes.
8. **Disciplinary plan.** Establish a company policy/requirement for all employees that disciplinary action will be taken against any employee that does not comply with company rules, regulations, etc.
9. **Annual Self-evaluation.** No action required at this level for evaluation of the company's safety and health management system.

Employee Involvement

Actions to Achieve Desired Outcomes

1. **Safety and Health Perception Survey.** Company evaluates the current safety and health perceptions and practices and establishes a baseline in the following areas for each of the following categories of personnel – managers, supervisors, non-supervisory employees.
 - a. Levels of involvement in the safety and health program.
 - b. Values regarding the importance of worker safety and health.
 - c. Perceptions of the effectiveness of the total company's safety and health management system.
 - d. Perceptions of how well the culture encourages and supports reporting on hazards, incidents, and injuries.
 - e. Compliance with safety and health requirements.
 - f. Perceptions regarding their roles, responsibilities, and accountability in ensuring safety and health wherever they are working.
2. **Safety and Health Perception Survey Action Plan.** Develop an action plan to address the findings from the survey and begin implementation of the plan.
3. **Employee notification.** Notify company and subcontractor employees as follows:
 - a. Inform managers, supervisors, non-supervisory employees of their rights and responsibilities under the Occupational Safety and Health Act. Take steps to encourage them to freely exercise their rights and responsibilities, especially that of freely reporting hazards in the workplace.
 - b. Inform current employees and new hires as part of new employee orientation, of the company's participation in BEST and of the fundamental principles of BEST.
4. **Employee involvement.** Develop a plan, including an implementation schedule, for how to bring about the meaningful involvement of all managers, supervisors, and non-supervisory employees through participation in various safety and health related activities. Specifically, for this BEST Level:

BEST Level 1 Guidance

- a. Establishment of teams (*e.g.*, a safety and health planning team, BEST Team, etc.) representing different sectors of the company's staff, to bring about meaningful change.
- b. Begin to involve some employees in safety and health activities such as incident investigations. Note: ensure that proper training is provided before employees conduct such activities.
- c. Establish a policy/requirement that key subcontractors will adopt the company processes for employee involvement, participate in company activities, or establish equivalent processes.

Subcontractor Worker Coverage

Actions to Achieve Desired Outcomes

1. **Subcontractor oversight and management system.** Develop, document, and begin implementing the following basic elements of an oversight and management system covering subcontractors:
 - a. **Equal safety and health protection.** Develop and begin implementing a plan for how subcontractors will provide their employees with safety and health protection equal in quality to that provided to company employees.
 - b. **Adherence to safety and health rules.** Inform all subcontractors and their employees that they are required to adhere to all of the company's safety and health rules, regardless of their status or the length of time they perform work on the site/project.
 - c. **Hazards in subcontractor work areas.** Establish a requirement that subcontractors provide timely identification, correction, and tracking of uncontrolled hazards in their work areas (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene, ergonomic, etc., issues).
2. **Subcontractor Selection Criteria.** Establish and begin implementing a policy/requirement defining the company's subcontractor selection criteria that includes as a minimum, review of the previous three years of injury and illness records, and review of written safety and health management program
3. **Removal policy** – No action required at this level.

Worksite Analysis

Begin to develop a system for identifying basic and unforeseen safety and health hazards, evaluating their risks, prioritizing them, and recommending methods to eliminate or control hazards to an acceptable level of risk.

Initial Safety and Industrial Hygiene Hazard Analysis

Actions to Achieve Desired Outcomes

1. Conduct an initial safety and industrial hygiene hazard analysis to establish initial levels of company and key subcontractor employee exposure for comparison to future levels, so that changes can be recognized. This study should include a review of previous incidents, injuries, and illnesses; complaints of workplace hazards; previous studies, etc.

2. Ensure that the initial survey accomplishes the following:
 - a. Identifies and documents common safety hazards on the project/site and how they are controlled.
 - b. Identifies and documents common health hazards on the project/site and determine if further sampling is required.
 - c. Identifies and documents safety and health hazards that need further study.
 - d. Ensures that initial surveys adequately cover the entire work site and indicates who conducted the survey, and when it was completed.
3. Repeat the initial survey only if warranted by significant changes (*e.g.*, changes in processes, equipment, and hazard controls).

Hazard Analysis of Routine Jobs, Tasks, and Processes

Actions to Achieve Desired Results

1. Review and ensure that programs developed and/or implemented are in compliance with local, state, and Federal safety and health regulations based on routine tasks performed.
2. Begin to formalize a system to ensure employees are properly trained in the procedures implemented.

Hazard Analysis of Significant Change

Actions to Achieve Desired Results

1. Company has established and has begun implementing a policy/requirement to identify and document safety and health hazards of significant changes, new processes, and significant changes in design or engineering plans, materials, equipment and facilities to identify uncontrolled hazards prior to the activity or use and recommend adequate hazard controls.
2. Establish a policy/requirement that key subcontractors will adopt the company process for hazard analysis of significant changes, participate in company hazard analysis activities, or establish equivalent processes.

Pre-use Analysis

Actions to Achieve Desired Results

1. If the company is considering new equipment, chemicals, facilities, or significantly different operations or procedures, conduct a pre-use analysis to review the potential safety and health impact on the workers.
2. Develop and begin implementing a plan for how to integrate this practice into the procurement/design phase to maximize the opportunity for proactive hazard control.
3. Take proactive steps to ensure pre-use analysis continues to be integrated into the procurement/design phases.
4. Establish a policy/requirement that key subcontractors adopt the company process for pre-use analysis, participate in company activities, or establish equivalent processes.

Industrial Hygiene (IH) Program

Actions to Achieve Desired Outcomes

1. No action required at this level.

Routine Self-Inspections

Actions to Achieve Desired Outcomes

1. Establish a routine self-inspection program and perform safety and health inspections on a regular basis.
2. Train company employees in the recognition and avoidance of hazards in their work environment and begin having them routinely inspect their work areas, materials, and equipment on a regular basis.

Incident Investigations

Actions to Achieve Desired Outcomes

1. Company establishes a documented policy/requirement on reporting and investigating incidents.
2. Company investigates incidents and maintains written reports of the investigations. Investigations should follow the following guidelines:
 - a. Identify all contributing factors.
 - b. Document the entire sequence of relevant events.
 - c. Recommend actions to prevent recurrence.
 - d. Assign timeframes and responsibility for implementing recommended controls.
3. Establish a policy/requirement that key subcontractors adopt the company process for incident investigation, or establish equivalent processes.

Hazard Reporting System for Employees

Actions to Achieve Desired Outcomes

1. Use data collected on incident reports (e.g., Employers First Report of Injury), insurance loss runs, etc. to determine the areas that should be concentrated on.
2. Share information and seek supervisor and employee input for a suggested plan of action for developing a hazard reporting system, using model programs (e.g., from insurance carriers, peer groups, BEST Coordinator) for guidance.

Trend Analysis

Actions to Achieve Desired Outcomes

1. Conduct an initial trend analysis of previous three complete calendar years' injury and illness history, based on a thorough review of OSHA 300 logs, workers compensation claim forms, and incident reports.
2. Begin developing a plan for conducting an analysis of other safety and health-related information (e.g., hazards identified during inspections, employee reports of hazards, incidents, near-hit incidents, etc.) for the purpose of establishing or detecting trends, planning, and setting targets.

Hazard Prevention and Control

Begin to develop systems to prevent and control hazards on all worksites.

Certified Professional Resources

Actions to Achieve Desired Outcomes

1. Ensure that outside sources are available if needed to conduct an initial hazard analysis, and that they are qualified to perform the survey pertinent to the work activity involved.

Hazard Elimination and Control Methods

Actions to Achieve Desired Outcomes

1. Company establishes and implements a system that prioritizes hazards identified in this level based on the potential seriousness of injury, illness, property loss, frequency of exposure, and long-term effects so that the highest hazard items are addressed first. Establish an action plan for correction.
2. Identify options and select the most appropriate option or combination of options for hazard elimination and control methods, including engineering controls, administrative controls, work practices, and personal protective equipment (PPE).
3. Take steps to ensure that the selected controls are appropriate to the project/site's hazard(s); understood and followed by all affected parties; equitably enforced through the disciplinary system; written, implemented, and updated as needed; used by employees; and incorporated into training, positive reinforcement, and correction programs.
4. Require key subcontractors to adopt company hazard elimination and control system or implement an equivalent system.

Hazard Control Programs

Actions to Achieve Desired Outcomes

1. Conduct an inventory of existing hazard control programs required by VOSH standards (*e.g.*, PPE, Hazard Communication, Respiratory Protection, Lockout/Tagout, Confined Space Entry, Process Safety Management, or Bloodborne Pathogens).
2. Review existing programs to identify what is missing or unsatisfactory.
3. Develop missing programs and modify existing programs, as needed, to meet all VOSH guidelines, including training requirements.
4. Develop and distribute to employees appropriate company safety and health rules, requirements, procedures, manuals, etc., necessary to define and communicate company hazard control programs.
5. Require key subcontractors to adopt and implement company hazard control programs or establish equivalent programs.

Occupational Health Care Program

Actions to Achieve Desired Outcomes

1. **Records Review:** Conduct a thorough review of injury/illness records (see above) and ensure they are in order.
2. **Licensed health care professionals.** Provide resources to utilize certified safety professionals (CSP), or certified industrial hygienist (CIH) and licensed health care professionals if needed based on the safety and health analysis. Provide emergency services as listed above.
3. **Subcontractor Health Care.** Require subcontractors to provide access to health care services, as required, based on results of the initial safety and health analysis including physician and emergency medical care.

Preventive Maintenance of Equipment

Actions to Achieve Desired Outcomes

1. Company will perform preventive maintenance as required by manufacturer.
2. Require subcontractors to perform preventive maintenance as required by manufacturer.

Tracking of Hazard Correction

Actions to Achieve Desired Outcomes

1. Develop and begin using a documented system to record hazards identified in this Level through the initial study, trend analysis, and incident investigations. The system must document priority, assign responsibility for correction, establish timeframes for correction, and follow up to ensure total abatement.
2. Require key subcontractors to adopt and implement the company tracking system or establish an equivalent system.

Emergency Preparedness and Response

Actions to Achieve Desired Outcomes

1. Establish and communicate company written procedures to company and subcontractor employees for responding during all shifts to all types of emergencies (fire, chemical spill, incident, terrorist threat, natural disaster, etc.).
2. Dependent upon project size and/or complexity, conduct at least one evacuation drill and assess how well the procedures worked.
3. Make available and explain to all employees emergency procedures and services, including provisions for physician care and emergency medical care, ambulances, emergency medical technicians, emergency clinics, or hospital emergency rooms, available for all shifts within a reasonable time and distance.
4. Ensure that there is at least one trained employee for each shift trained in first aid and CPR.
5. Require subcontractors to adopt the company emergency procedures or equivalent procedures, and participate in company emergency drills and activities listed above.

Safety and Health Training

Begin to provide training to safety and health and other staff to help them acquire the knowledge and skills they need to perform their safety and health responsibilities on all worksites.

Actions to Achieve Desired Outcomes

1. Provide training to company managers, supervisors, and non-supervisory employees following the general guidelines below:
 - a. Ensure VOSH required training is performed, documented and up-to-date.
 - b. Document attendance.
 - c. Ensure that training is conducted by persons who have specific subject matter knowledge or expertise.
 - d. Use findings of the various worksite analysis activities (*e.g.*, initial study, hazard analysis of routine jobs, tasks, and processes, etc.) to develop training that is relevant to the company.
2. At a minimum, provide the following types of training to current or new managers, supervisors, and non-supervisory employees:
 - a. Their rights and responsibilities under the VOSH laws, standards and regulations.
 - b. BEST fundamentals.
 - c. Hazards in the workplace; how to recognize hazardous conditions; signs and symptoms of workplace-related illnesses; protective measures; safe work procedures.
 - d. What is required personal protective equipment (PPE), why it is required, its limitations, how to use and maintain it.
 - e. Specific responsibilities for each type of emergency.
 - f. Emergency procedures as required.
3. At a minimum, provide the following types of training to managers and supervisors:
 - a. Specific safety and health responsibilities and how to carry them out effectively.
 - b. Methods for changing workplace safety and health attitudes and practices.
 - c. Virginia BEST fundamental principles.
 - d. Requirements for Virginia BEST Level 1.
4. At a minimum, provide an orientation program for subcontractor employees:
 - a. Their rights and responsibilities under VOSH laws, standards, and regulations.
 - b. Virginia BEST fundamental principles.
 - c. Hazards in the workplace.
 - d. Personal protective equipment (PPE) required on the job.
 - e. Specific responsibilities for each type of emergency.
 - f. Emergency procedures.