

Management Leadership and Employee¹ Involvement

Continue demonstrating serious and committed safety and health leadership by taking additional steps to improve the culture, systems, policies, and procedures that support a safe and healthy work environment.

Management Commitment

Actions to Achieve Desired Outcomes

1. **Safety and Health Vision and Mission Statements.** Continue to communicate the company's Safety and Health Vision and Mission Statements to company and subcontractor employees. Incorporate appropriate information about the Safety and Health Vision and Mission Statement into the company's orientation training for new employees and subcontractors. Include the company's safety and health vision and mission statement in contract bid documents.
2. **Leadership.** Company managers continue setting an example through behaviors that demonstrate total commitment to safety and health. Ensure increased participation by top executives and managers in safety and health related activities, including examples of activities established in Level 1. Require key subcontractors to begin implementing a policy/requirement on leadership and participation or follow established policies and requirements of the key subcontractor.
3. **Adequate resources and safety and health integration.** Company continues committing and ensuring the utilization of adequate resources to support safety and health activities and programs including certified safety and health and licensed health care professionals. Improve the integration of safety and health into other planning and budgeting processes.
4. **Safety and health targets and objectives.** Review progress towards achievement of the company safety and health targets and objectives, as well as the policies and procedures to meet them; revise and communicate new annual targets and objectives, as appropriate. Require that key subcontractors develop targets and objectives that are consistent with and supportive of the Company's overall targets related to BEST participation and BEST performance. Key subcontractors begin implementing requirement.
5. **Clear lines of communication with employees and employee access.** Continue to take necessary action to clarify lines of communication with Company and subcontractor employees and ensure access to senior management regarding safety and health issues.
6. **Clear responsibilities, authority, and accountability for safety and health.** Continue clarifying safety and health expectations for each company and subcontractor employees.
 - a. Begin implementing the accountability plan for company managers, supervisors, and safety and health staff; incorporate performance, responsibilities and standards for safety and health, as well as the consequences for meeting or failing to meet expectations.
 - b. Communicate management expectations regarding everyone's safety and health responsibilities.
 - c. Support the authority of designated staff members who are accountable for safety and health targets.
 - d. Communicate which company personnel are responsible for achieving safety and health targets and objectives, with no unassigned areas, so that each employee and key subcontractor employee worker understands his/her responsibility for safety and health (See item M6 on Virginia Best Self-Assessment Form).

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.

- e. Monitor the performance of all company managers, supervisors, and specific safety and health staff members; giving them specific and timely feedback on performance; requiring corrective action plans if needed; conducting performance appraisals; providing commensurate rewards and recognition for good performance; and implementing consequences for poor performance.
 - f. Require that key subcontractors adopt and begin implementing the company accountability planning process or establish an equivalent process.
7. **Continue development and begin implementing disciplinary plan.** Continue to develop policy, procedures, and consequences with an implementation schedule. Ensure equitable enforcement among all non-supervisory employees, as well across levels (e.g., management staff should not get better treatment than non-supervisory employees). Demonstrate that employees will be held accountable for non-compliance with rules and requirements. Require that key subcontractors adopt and begin implementing the company procedure or establish equivalent processes.
 8. **Annual self-evaluation of safety and health management system.** Develop a written company procedure defining how annual self evaluations and other evaluations will be performed, including the requirement for written narrative reports. Require that key subcontractors adopt company procedures or establish an equivalent process.

Employee Involvement

Actions to Achieve Desired Outcomes

1. **Safety and Health Perceptions Survey.** Review and respond to the findings and conclusions of the Safety and Health Perceptions Survey conducted in Level 1.
2. **Safety and Health Perceptions Survey Change Plan.** Implement the company's Safety and Health Perception Survey Change Plan developed in Level 1. Require key subcontractors to develop an action plan that addresses findings related to them.
3. **Employee notification.** Notify new Company managers, supervisors, and non-supervisory employees of their rights and responsibilities under VOSH laws, standards and regulations; of the company's participation in BEST; and of the fundamental principles of BEST, and any other pertinent information. Incorporate this information into the company's orientation training for new employees and subcontractors.
4. **Employee involvement.** Implement the company employee involvement plan, developed in Level 1, such as:
 - a. The formation of new and/or greater participation in, safety and health teams to meet the company's needs at this level.
 - b. Increase employee participation as part of safety and health teams that conduct incident/near-hit investigations, self-inspections, and job hazard analyses.
 - c. Require key subcontractors to adopt and begin implementing the company employee involvement plan, participate in activities per contract and/or agreement, or establish equivalent plans.

Subcontractor Worker Coverage

Actions to Achieve Desired Outcomes

1. **Subcontractor oversight and management system.** Company improves and fully implements the following basic elements of an oversight and management system covering subcontractors:

BEST Level 2 Guidance

- a. **Equal safety and health protection.** Work with subcontractors to improve and continue implementing the key subcontractor program begun in Level 1 to the point that provides protections equal to company programs.
- b. **Adherence to safety and health rules.** Improve process for requiring subcontractor workers who work onsite, whether regular or temporary to adhere to all of the company's safety and health rules, regardless of their status or the length of time they perform work onsite. The process must include advising subcontractor workers that disciplinary action will be taken against employees that do not follow company rules and requirements.
- c. **Hazards in subcontractor work areas.** Ensure subcontractors improve and formalize their own processes for the timely identification, correction, and tracking of uncontrolled hazards in their work areas and operations (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene, ergonomic, etc., issues).
- d. **Subcontractor selection and oversight.** Implement a policy and process for addressing safety and health performance of potential bidders including the review of written safety and health plan and injury and illness rates, in subcontractor selection and oversight.
- e. **Removal of subcontractor for violations.** Company establishes and implements a penalty policy and process, for safety or health violations in subcontractor work areas including removal and/or financial penalties.

Worksite Analysis

Continue developing 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 (IH) Hazard Analysis

Actions to Achieve Desired Outcomes

1. Company requires as a contract requirement that key subcontractors must perform an initial safety and IH hazard analysis for the work they are contracted and assigned to perform. Key subcontractors begin performing the required initial safety and IH hazard analyses. (See IH Required Actions below).

Hazard Analysis of Routine Jobs, Tasks, and Processes

Actions to Achieve Desired Outcomes

1. Identify and document safety and health hazards of routine jobs, tasks, and processes and recommend hazard controls by conducting task-based or system/process hazard analyses when the routine jobs, tasks, and processes have had injuries/illnesses associated with them or have experienced significant incidents or near-hit incidents; are perceived as high-hazard tasks, *i.e.*, which could result in a catastrophic explosion, electrocution, or chemical overexposure; or are required by a regulation or standard. Identify the steps of the task or procedure being analyzed, the hazard controls currently in place, recommendations for needed additional hazard controls, dates conducted, and the responsible parties.
2. Update the company hazard analysis as appropriate, such as when the environment, procedures, or equipment change or when hazards are found that invalidate the most recent hazard analysis.

3. Require key subcontractors to adopt and begin implementing the company's hazard analysis of routine system or establish equivalent plans. Key subcontractors begin performing effective hazard analysis of routine work.

Hazard Analysis of Significant Changes

Actions to Achieve Desired Outcomes

1. Company continues identifying and documenting potential safety and health hazards of significant changes, including but not limited to non-routine tasks (e.g., performed less than once per year), new processes, materials, equipment, and facilities to identify uncontrolled hazards prior to the activity or use and recommends adequate hazard control measures.
2. Key subcontractors implement policy and begin identifying and documenting safety and health hazards of significant changes in the work they are contracted to perform, including but not limited to non-routine tasks

Pre-Use Analysis

Actions to Achieve Desired Outcomes

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 impacts on workers.
2. Key subcontractors begin to perform pre-use analysis for work they are contracted to perform.

Industrial Hygiene (IH) Program

Actions to Achieve Desired Outcomes

1. Following established BEST guidelines; the Company develops a written Industrial Hygiene (IH) program to establish procedures and methods for identifying, analyzing, and controlling health hazards to prevent occupational disease. The written program must address sampling issues, including sampling methods, performed by whom, required documentation, and how information is communicated to workers.
2. Company begins implementing-the IH Program by doing the following:
 - a. Follow up on the results of the initial study conducted in Level 1.
 - b. Establish and implement sampling frequencies – a schedule for sampling identified hazards – and conduct additional sampling as needed, based on findings of the initial hazard analysis, review of chemicals, employee reports of hazards, previous exposures, and reports of illnesses.
 - c. Begin implementing appropriate controls for hazards identified in Level 1.
3. Company requires key subcontractors to adopt and implement the company IH program for the work they are contracted to perform or establish an equivalent program.
4. Key subcontractors establish and begin implementing IH program activities discussed above, follow up on initial IH study results, if appropriate, and perform more in-depth analyses to determine actual employee exposures.

Routine Self-inspections

Actions to Achieve Desired Outcomes

1. Company develops a documented system for routinely scheduled self-inspections of the workplace, including a tool or checklist, the inspection schedule, the members of the regular self-inspection teams to be created, recording of findings, responsibility for abatement, and tracking of identified hazards for timely correction.
2. Start self-inspections, at a minimum, by competent persons and cover worksites at least weekly.
3. Company requires subcontractors to adopt and implement the company routine inspection program or establish an equivalent program.
4. Subcontractors have adopted an equivalent documented routine self-inspection system program and begun performing routine inspections of the work activities and areas they were contracted to perform.

Hazard Reporting System for Employees

Actions to Achieve Desired Outcomes

1. Company develops and begins implementing a hazard-reporting system, which may be anonymous, that allows employees to use specific tools to inform management staff without fear of reprisal, about potential hazardous conditions, incidents, and near-hit incidents.
2. Determine and communicate to employees how they will receive feedback on actions taken regarding the hazards they report.
3. Company requires key subcontractors to adopt and implement the company employee hazard reporting system or establish an equivalent system.
4. Key subcontractors begin to implement an equivalent employee hazard reporting system for the work activities and area they are contracted to perform.

Investigation of Incidents and Near-Hit Incidents

Actions to Achieve Desired Outcomes

1. Company and key subcontractors continue investigating incidents, following the guidelines established in Level 1.
2. Company and key subcontractors expand their incident investigation procedures to include near-hit incidents and begin investigating near-hit incidents, following the same guidelines established in Level 1 for investigating incidents.
3. Company and key subcontractors continue making findings and corrective actions available to employees on request (although actual investigation records need not be provided).

Trend Analysis

Actions to Achieve Desired Outcomes

1. Conduct a trend analysis of the other safety and health-related information not yet studied (*e.g.*, hazards identified during inspections, employee reports of hazards, incidents and near-hit incidents, etc.) for the purpose of establishing or detecting trends, planning, and setting targets.
2. Conduct another trend analysis of injury and illness history if a year has gone by since the initial trend analysis.
3. Company requires key subcontractors to adopt and implement the company systems for trend analysis or establish an equivalent system.

Hazard Prevention and Control

Continue implementing and improving systems to prevent and control hazards.

Certified Professional Resources

Actions to Achieve Desired Outcomes

1. Company ensures adequate resources such as certified safety and health professionals and other licensed health care professionals and other experts as needed, based on the risks at each site.
2. Key subcontractors ensures the availability to certified safety and health professionals and other licensed health care professionals as needed.

Hazard Elimination and Control Methods

Actions to Achieve Desired Outcomes

1. Company prioritizes hazards identified in this level based on seriousness and frequency of injury or illness or property loss, frequency of exposure, and long-term effects. Establish an action plan for correction.
2. Company identifies options and selects the most appropriate option or combination of options for hazard elimination and control methods, including engineering controls (including protective safety devices), administrative controls, work practices, and personal protective equipment.
3. Company has taken steps to ensure that the selected controls are appropriate to each site's hazards, understood and followed by all affected parties and equitably enforced through the disciplinary system. The company also ensures controls are written, implemented, updated as needed, used by employees, and incorporated into training programs for positive reinforcement and correction.
4. Key subcontractors adopt equivalent hazard control methods and have begun implementing the controls listed above in the work it has been contracted to perform.

Hazard Control Programs

Actions to Achieve Desired Outcomes

1. Company continues implementing hazard control programs required by VOSH standards. Modify and improve, as needed.
2. Company continues training all workers on these programs, as needed.
3. Company establishes necessary hazard control programs in compliance with new VOSH standards, if any.
4. Key subcontractors adopt and begin implementing equivalent hazard control programs in the work they are contracted to perform.

Tracking of Hazard Correction

Actions to Achieve Desired Outcomes

1. Continue implementing and improving the documented system established in Level 1 to record hazards identified.
2. Record priority, responsibility for correction, time frames for correction, and follow-up to ensure total hazard abatement.
3. Key subcontractors have begun implementing a hazard correction tracking system for hazards identified in the initial hazards analyses, trend analysis, and self inspection.

Preventive Maintenance of Equipment

Actions to Achieve Desired Outcomes

1. Company reviews the equipment inventory developed in Level 1.
2. Company establishes and begins following a preventive maintenance schedule to monitor and maintain equipment so that it can be replaced or repaired on a schedule according to manufacturers' recommendations.
3. Key subcontractors adopt equivalent preventive maintenance systems and begin implementation by inventorying equipment and material needing preventive maintenance.

Occupational Health Care Program

Actions to Achieve Desired Outcomes

1. **Licensed health care professionals.** Company provides employees' access to licensed health care professionals who can provide onsite or offsite services.
2. **Health services, as needed.** Company arranges for health services, such as pre-placement physicals, audiograms, and lung function tests for employees, as needed, based on the outcomes of the initial safety and health analysis.
3. Subcontractors determine how equivalent access to licensed health care, physician care, and emergency services will be provided for their employees working on each site.
4. Key subcontractors and company (per agreements) begin providing occupational health care for key subcontractor employees.
5. Information will be communicated to employees in writing and will be a part of the employee site orientation program.

Emergency Preparedness and Response

Actions to Achieve Desired Outcomes

1. Company and subcontractors continue communicating the emergency procedures in compliance with applicable BEST criteria.
2. Company and key subcontractors improve emergency procedures and services, including provisions for emergency medical care, emergency transportation, emergency clinics, or hospital emergency rooms.
3. Company and key subcontractors establish an Emergency Response Team including persons trained in first aid and CPR available on all shifts (or an alternative that is at least as effective). Increase the number of trained individuals from Level 1.
4. Company and key subcontractors conduct at least one evacuation drill, assess how well the procedures worked, and improve the emergency procedures, as needed.

Safety and Health Training

Continue providing and improving training to all staff to help them acquire the knowledge and skills they need to better perform their safety and health responsibilities.

Actions to Achieve Desired Outcomes

1. Company and subcontractors continue to provide training to managers, supervisors, non-supervisory employees, and subcontractors following the general guidelines established in Level 1.
2. As needed, company and subcontractors continue to provide current or new managers, supervisors, non-supervisory employees, subcontractors, and designated safety and health staff all the required training established in Level 1.
3. In addition to required training established in Level 1, company and key subcontractors provide the following types of training to designated safety and health staff and others with assigned safety and health responsibilities to help them develop the knowledge and skills necessary to perform their assigned tasks. This include the following:
 - a. How to develop a disciplinary plan/program.
 - b. How to develop a system and written procedures to annually evaluate the company's safety and health management system.
 - c. How to conduct hazard analyses of significant changes.
 - d. How to conduct pre-use analysis.
 - e. How to conduct IH sampling, if applicable.
 - f. How to conduct an annual evaluation of the safety and health management system.
4. In addition to required training established in Level 1, subcontractors provide their workers with training on how to recognize hazardous conditions, signs and symptoms of workplace related illnesses, protective measures, and safe work procedures for the work they are contracted to perform.