

Management Leadership and Employee¹ Involvement

Take proactive steps to build on earlier gains 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 and take necessary steps to ensure all employees understand the statements. Ensure that appropriate information about the company's Safety and Health Vision and Mission Statements becomes a routine part of the training for new employees.
2. **Leadership by example.** Management continues setting an example through behaviors that demonstrate total commitment to safety and health (see examples in Level 1). Ensure total involvement of all executives, managers, and supervisors in the safety and health related activities and programs.
3. **Adequate resources and safety and health integration.** Managers continue committing and ensuring the utilization of adequate resources to support safety and health activities and programs. Ensure that safety and health is routinely integrated into all planning processes, both company and key subcontractors.
4. **Safety and health targets and objectives.** Company and key subcontractors review, revise, and continue communicating, as appropriate to this level, the previous year's safety and health targets and objectives, as well as the policies and procedures to meet them. Ensure that safety and health targets and objectives are routinely considered in planning for and implementing the various activities and program
5. **Clear lines of communication with employees and employee access.** Continue to take necessary action to clarify lines of communication with all employees and subcontractors and ensure reasonable access to senior management with regard to safety and health issues. Take proactive steps to encourage open dialogue between management staff and employees.
6. **Clear responsibilities, authority, and accountability for safety and health.** Company and key subcontractors continue clarifying safety and health expectations for each employee. Ensure that all workers understand and accept their safety and health roles and responsibilities. Continue supporting the authority of designated staff members who are accountable for achieving safety and health targets and objectives. In addition:
 - a. Ensure that safety and health performance elements have been incorporated into the written job descriptions and performance plans of all employees, including managers, supervisors, and non-supervisory employees, as well as key subcontractors.
 - b. Incorporate safety and health responsibilities into the job descriptions and performance plans of all non-supervisory employees and ensure that every individual's safety and health performance is monitored and evaluated and that everyone receives feedback on their safety and health performance.
 - c. Develop and implement a system of rewards and recognition for exemplary safety and health performance and achievements.

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.

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7. **Disciplinary plan.** Improve and continue implementing the disciplinary plan, developed in Level 1 ensuring equitable enforcement as required. Enforce the plan to ensure higher levels of compliance to achieve the desired outcomes.
8. **Annual self-evaluation of safety and health management system.** Company and key subcontractors implement systems and written procedures to annually evaluate their safety and health management systems. The evaluations may be conducted by company and/or key subcontractor employees with managers, qualified corporate staff, or trained outsiders. The evaluations must:
 - a. Identify in a written narrative report the strengths and weaknesses of the safety and health management system.
 - b. Contain specific recommendations, timelines, and assignment of responsibilities for improvements.
 - c. Document actions taken to satisfy the recommendations.
 - d. The company must conduct at least one annual self-evaluation of its safety and health management system in this level.
 - e. The company must conduct additional self-evaluations each year they remain in the BEST program.
 - f. If applicable, there must be a self-evaluation performed immediately prior to construction completion.

Employee Involvement

Actions to Achieve Desired Outcomes

1. **Follow-up Safety and Health Perception Survey.** Company conducts a follow-up Safety and Health Perception Survey to identify further improvements.
2. **Safety and Health Perception Survey Change Plan.** Company continues implementing the Safety and Health Perception Survey Change Plan developed in Level 1.
3. **Employee notification.** Company continues notifying new 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. All changes will be incorporated into the company's orientation training for new employees and subcontractors. Take proactive steps to encourage all workers to freely exercise their rights, especially that of freely reporting hazards in the workplace. At least annually, reinforce policies for all company and subcontractor employees of these rights and responsibilities.
4. **Employee involvement.** Take proactive steps to ensure full implementation of the employee involvement plans developed in Level 1 and refined in Level 2. Additionally for Level 3 the contractor will:
 - a. Ensure that all the safety health teams needed to achieve the required outcomes for Level 3 are established and that there is broad and active employee participation in these teams.
 - b. Ensure that audits, incident investigations, self-inspections, and job hazard analyses are routinely conducted by regular teams that have broad and active employee representation.
5. **Take proactive steps for key subcontractor employee participation.** Encourage more active and open worker participation by all key subcontractors' employees and continue to develop programs to include more participation for key subcontractor employees where appropriate.

Subcontractor Worker Coverage

Actions to Achieve Desired Outcomes

1. **Adherence to Rules.** Ensure subcontractors and multi-tier subcontractors are aware of company safety and health rules and continue to enforce for safety and health violations.
2. **Subcontractor selection and oversight.** Continue to improve and implement the subcontractor oversight program. Take proactive steps to ensure that subcontractor employees receive safety and health protection equal to that received by company employees. Ensure employees adhere to the company's safety and health rules and are promptly removed for safety and health violations. Also, company management will consider contractors' safety and health management systems and performance in selecting subcontractors.
3. **Subcontractor hazard correction.** Ensure that the subcontractors have the ability to identify, correct, and track uncontrolled hazards in work areas they are responsible for (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene and ergonomic issues).
4. **Removal Policy.** Ensure subcontractors and multi-tier subcontractors are aware of the penalty policies and their possible removal for serious safety and health violations that go uncorrected.
5. **Safety and health management systems for subcontractors.** Continue working with subcontractors and encourage and support their development and operation of their own effective safety and health management systems.

Worksite Analysis

Take proactive steps to maintain and continuously improve the Company's 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.

Actions to Achieve Desired Outcomes

1. **Initial Survey.** Company and key subcontractors repeat the initial survey only if necessary by significant changes (*e.g.*, changes in processes, equipment, hazard controls, etc.).
2. **Hazard Analyses of Routine Jobs, Tasks, and Processes.** Company and key subcontractors continue conducting hazard analyses and follow guidelines specified in Level 2 to identify, analyze, and control hazards. Specifically, for this Level:
 - a. Identify hazards of routine jobs, tasks, and processes.
 - b. Recommend adequate hazard controls by conducting task-based or system/process hazard analyses when the routine jobs, tasks, and processes have written procedures, recommended by other studies and analyses for a more in-depth analysis.
 - c. Are determined by the BEST participant to warrant a hazard analysis.
3. **Hazard Analysis of Significant Changes.** Company and key subcontractors continue to identify and document the potential safety and health hazards of significant changes including but not limited to non-routine tasks (*e.g.*, performed less than once a year), new processes, materials, equipment, and facilities to identify uncontrolled hazards prior to the activity or use. Recommend adequate hazard controls (*i.e.*, uncontrolled hazards include those that cannot be immediately corrected, such as industrial hygiene and ergonomic issues).

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4. Pre-use Analysis

- a. Company and key subcontractors, when considering new equipment, chemicals, facilities, or significantly different operations or procedures, will continue to conduct a pre-use analysis (defined in Level 2) to review the potential safety and health impact on the workers at a level of detail appropriate considering the perceived risk and the number of people who may be affected.
- b. Company develops and begins implementing a plan for how to integrate this practice into the procurement/design phase to maximize the opportunity for proactive hazard controls and requires that key subcontractors adopt and implement the company or an equivalent plan.
- c. Company and key subcontractors take proactive steps to ensure that pre-use analysis continues to be integrated into the procurement/design phase.

5. **Industrial Hygiene program.** Company and key subcontractors continue implementing the IH programs to identify, analyze, and control health hazards to prevent occupational disease.

6. Routine self-inspections.

- a. Company and subcontractors continue implementing the documented system for routinely scheduled self-inspections of the workplace developed in Level 2.
- b. Company and subcontractors continue conducting self-inspections by designated safety and health staff, with the participation of other non-supervisory employees.
- c. Company and subcontractors take proactive steps to ensure that self-inspections are routinely conducted and the entire work site is covered at least weekly.

7. **Hazard-reporting system.** Company and key subcontractors continue implementing the hazard-reporting systems and encourage more active reporting. Implement program improvements as needed. Ensure regular feedback to all employees on the status of hazards reported (*e.g.*, through meetings, newsletters, e-mail messages, bulletin board postings, Intranet postings, etc.). Take proactive steps to encourage all workers to freely make suggestions and report hazardous conditions without fear of retaliation.

8. **Investigation of incidents and near-hit incidents.** Company and key subcontractors continue investigating incidents and near-hit incidents, as needed, following the guidelines specified in Level 1 and 2.

9. **Trend Analysis.** Company takes proactive steps to implement systems for trend analysis of company and key subcontractor safety and health information to ensure that the process takes place regularly (at least annually) as scheduled, for all types of safety and health information and is used in setting future targets to address identified trends of incidents, injuries and illnesses.

Hazard Prevention and Control

Take proactive steps to fully implement and continue improving already established systems to prevent and control hazards.

Actions to Achieve Desired Outcomes

1. **Certified professional resources.** Company and key subcontractors continue to provide necessary resources such as appropriate use Certified Safety Professionals (CSP), Certified Industrial Hygienist (CIH), and other professionals and experts as needed based on the risks associated with the work contracted.

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2. **Hazard elimination and control methods.** Company and key subcontractors continue to proactively identify hazards and selecting options or combinations of options to eliminate or control hazards using the most appropriate methods (*i.e.*, engineering controls including protective safety devices, administrative controls, work practices, and personal protective equipment). Correct all hazards identified in this and previous levels, including long-term abatement projects, before graduating from Level 3.
3. **Hazard control programs.** Company and subcontractors continue to maintain all hazard control programs required by a VOSH standard, complying with all rules, requirements, and guidelines. This includes an annual review and training, if required. Take proactive steps to establish hazard control programs, if any, required by new VOSH standards and to modify or update existing programs, as needed.
4. **Hazard correction tracking.** Company and key subcontractors continue to implement and improve the company's documented hazard tracking system. Take proactive steps to improve the tracking system, ensure that it is fully implemented, and communicate with all workers throughout the process on the status of specific hazards identified until they are totally abated.
5. **Preventive maintenance of equipment.** Company and key subcontractors continue to implement the preventive maintenance schedule on equipment to prevent any hazardous conditions. Take proactive steps to ensure that the company and key subcontractors have an established, routinely-observed preventive maintenance schedule and that preventive maintenance is automatically part of future systems.
6. **Occupational health care program.** Company and key subcontractors take proactive steps to continue providing effective occupational health care programs, including:
 - a. Provisions for access to or availability of licensed health care professionals, needed health services, and emergency medical care. Improve the program based on all available safety and health information.
 - b. Expand use of licensed health care providers which may include visits to sites, to help identify causes and symptoms of occupational injuries and illnesses. Ensure care provided is within the scope of the contracts, licensure, and standard operating procedures.
7. **Emergency preparedness and response.** Company and key subcontractors continue to improve, communicate, and implement the written procedures for responding during all shifts to all types of emergencies. Dependent upon project size and/or complexity, conduct at least one evacuation drill and assess how well the procedures worked. Encourage use of AEDs, as appropriate, and provide necessary training for their use. Take proactive steps to ensure full implementation and automatic tracking of the company's emergency preparedness and response program and procedures. Establish a hazardous material team if necessary and consult with local fire department to ensure adequate coverage for fire, explosion, or chemical release.

Safety and Health Training

Take proactive steps to provide and improve training to all staff to help them acquire and maintain 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 all workers following the general guidelines specified in Level 1.

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2. Company and key subcontractors take proactive steps to improve and continue providing training on specific topics, as needed.
3. Company and key subcontractors provide training for workers on how to recognize and control hazardous conditions and the signs and symptoms of workplace related illnesses and injuries.