

## SECTION 60

### Corporate Safety Review

#### 1. PURPOSE AND SCOPE

The Corporate Safety Review (CSR) is a management tool that evaluates the Health and Safety process at a specified work location. Findings will identify effective process implementation, specific hazards, and issues of concern, and will provide a basis for management strategies to continuously improve HS performance.

Evaluations are designed to be comprehensive in scope and will include the HS plans, policies, procedures, and requirements of the MAPP, the client, subcontractors, and applicable regulatory agencies. Both current and future work areas and activities shall be included in the scope of the evaluation. All work activities and all HS-related documentation are subject to evaluation and review.

Activities of employees, subcontractors, and any other HS-related exposures that could create hazards to them or a liability for our client or for the MAPP are included in the CSR. Concerns identified during the evaluation that are not within the contractual responsibility of the MAPP and do not present an exposure to employees or subcontractors should be forwarded to the appropriate responsible party but are not included in the CSR.

This process is designed for use at direct-hire or self-perform work locations and projects where MAPP functions as the prime or general contractor.

#### 2. RESPONSIBILITIES

General responsibilities for HS Program implementation are stated in Section 40 Safety Management and Responsibility, Additional management, staff, employee, and subcontractor responsibilities that address duties specific to this topic are stated in this procedure.

##### 2.1. Senior Leadership Team

- 2.1.1. Identifying operations management representatives as potential members of the evaluation team,
- 2.1.2. Reviewing the findings of the CSRs conducted at their office and/or project locations, and
- 2.1.3. Confirming implementation of corrective actions with the assigned project or office manager.

##### 2.2. Project Manager

- 2.2.1. Providing escorts to the evaluation team, as necessary,
- 2.2.2. Ensuring access to all HS records and all work areas,
- 2.2.3. Prompt correction of all hazards identified during the evaluation and/or developing and implementing corrective action procedures for items that cannot

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- be promptly resolved, and
- 2.2.4. Providing a Corrective Action Plan or written response to the CSR within the designated time frame.
- 2.3. Corporate HS Department
  - 2.3.1. Defining the schedule for conducting CSRs in each PSSP (Project Site Specific Plan) document,
  - 2.3.2. Reporting CSR summary totals to management in monthly HS reports, and
  - 2.3.3. Evaluating the findings of all CSRs conducted to identify trends or common deficiencies that may require attention across all similar operations.
- 2.4. Evaluation Team Members
  - 2.4.1. Coordinating and scheduling the CSR with the responsible project or office manager,
  - 2.4.2. Conducting the evaluation in a professional manner and documenting findings objectively,
  - 2.4.3. Discussing possible corrective actions for deficiencies identified during the evaluation with the appropriate personnel,
  - 2.4.4. Conducting a closing conference with the responsible project or office manager before leaving the location, and
  - 2.4.5. Completing and issuing the CSR in a timely manner.
- 2.5. Lead Evaluator
  - 2.5.1. Selecting evaluation team members based on requisite expertise,
  - 2.5.2. Determining the appropriate size of the team,
  - 2.5.3. Providing a copy of the location's previous CSR to all team members,
  - 2.5.4. Providing technical and procedural guidance,
  - 2.5.5. Distribution of the final report.

### 3. DEFINITIONS

Corporate HS Department	Refers to the MAPP Health, Safety, typically referred to as "HS," and includes the MAPP President, HS, and the Senior Leadership Team, These employees typically work out of a home office location. HS Manager A full-time MAPP staff employee, who provides HS management to multiple projects/offices and provides supervision to multiple Superintendents. This individual typically works out of a home office location Baton Rouge, Louisiana.
Imminent Danger	Situations or conditions which could, in the opinion of the evaluation team, reasonably are expected to cause death or immediate serious

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	physical harm to personnel or significant damage to property or the environment.
Lead Evaluator	A MAPP HS Manager, who has thorough knowledge of the MAPP HS program and is, trained in the use of this procedure and associated evaluation protocols and who serves as the leader of the evaluation team.
Site Safety Coordinator	Full time on site HS representative responsible for providing HS management to that specific site project team and superintendent. This individual typically reports to this one work site every day, though it is possible to have SSC's over several sites located within close proximity of each other.
Project Manager	The MAPP employee responsible for overall project execution including implementation of the project's or office's HS program. The Project Manager's office may or may not be located at the project site.
Senior Leadership Team	The senior levels of management within each operating unit, including the Group Vice President and those Operations management personnel above the site/office management level.
Subcontractor	Any person, partnership, or corporation, which has a contract with the MAPP and/or their subcontractor(s), to furnish labor, material, or equipment as part of the work.

## 4. EVALUATION PROCEDURE

Guidelines and protocol for the evaluation team are provided in Figure 1, Guidelines for Evaluator and are further defined in the CSR Evaluator's training provided by the Corporate HS Department.

Use of a checklist to aid the evaluators with their review of relevant forms, manuals, procedures, and documentation requirements is recommended. A sample checklist for field/project operations has been provided as Figure 2, Project HS Checklist.

The general CSR evaluation process is outlined below.

### 4.1. Frequency

- 4.1.1. Newly established office locations and new field projects will have an initial CSR conducted during the early stages, typically within 30 days of occupancy or mobilization, to confirm that the HS program elements are in place.
- 4.1.2. CSRs should be conducted on field operations or field projects annually.
- 4.1.3. More frequent evaluations may be requested by the responsible HS or Operations Management and are always encouraged.
- 4.1.4. The project PSSP shall specify the planned CSR schedule.

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#### 4.2. Evaluation Team

- 4.2.1. The CSR team should be comprised of at least one operations management representative and one corporate HS manager. Typically, this would be those home office Operations and HS management representatives responsible for oversight of the location. An evaluation team including at least one “cold eyes” member is encouraged. One HS Manager will be designated as the Lead Evaluator and is responsible for overall coordination of the CSR process. The Lead Evaluator will assess factors such as workforce size, relative hazards, site geography, project complexity, etc. when determining whether more than two evaluators will be required.

#### 4.3. Schedule and Duration

- 4.3.1. The evaluation team should coordinate scheduling of the CSR with the project/office management team. The evaluation team must note that advance security arrangements are required by some clients to access certain areas of their facilities. The size and complexity of the project or office location and the size of the evaluation team will determine the time required to complete a thorough evaluation. Some CSRs can be completed in one day, many require two days, while larger or more complex locations may require a week or more. The team should strive to observe a majority of the workforce actively engaged in their work tasks.

#### 4.4. Format

- 4.4.1. Standard CSR formats are essential to ensure consistency throughout the MAPP and to provide for results trending and comparisons of multiple evaluations. It is recognized that certain unique conditions exist at various locations and that factors such as project delivery methods, e.g., agency agreements, joint venture agreements, etc., may require special considerations. A Senior HS Manager must approve insertion of additional categories or other modifications of the standard CSR forms.

#### 4.5. Opening Conference

- 4.5.1. A formal opening conference will be conducted by the evaluation team with the Project Manager and, Site Superintendent, and HS management team representatives. The evaluation team will explain the scope, purpose, schedule, and other details of the evaluation process. The Project/Super team should explain any client concerns, special hazards, security issues or local requirements to the evaluation team. The closing conference process and tentative schedule

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should also be discussed at this time. Client and subcontractor personnel are typically not involved in the opening/closing conference stages of the CSR process. Open and direct questions and discussions about potential shortcomings of the location's HS program are critical to the ultimate effectiveness of the evaluation. Therefore, any involvement that could distract from conducting totally candid conversations must be avoided.

#### 4.6. Photography

- 4.6.1. Photography may be allowed during the evaluation; however, many owners/clients do not allow photography on their sites. If the evaluation team is considering using photos to document their findings, approval must be secured from the location owner and the project/office manager. As with all evaluation findings, hazards identified in photographs must be appropriately addressed and corrective actions must also be confirmed and documented.

#### 4.7. Imminent Danger

- 4.7.1. Any imminent danger situations identified during the evaluation will cause immediate suspension of the CSR process and must be addressed immediately. All personnel will promptly be removed from the hazard and the situation must be secured to prevent further exposures until the situation is remedied. The Site Manager must promptly be informed of such findings and is responsible to inform the client and/or other employers' management representatives, if those parties are involved.

#### 4.8. Worker Interviews

- 4.8.1. As part of the field portion of the evaluation, the evaluation team members will randomly select workers for informal one-on-one or small group interviews. A mandatory percentage of the workforce that is to be interviewed is not prescribed; however, the evaluation team will determine what a representative number is for the particular location. Personnel from various categories (helpers, craftsmen, foremen, supervisors) should be interviewed, including personnel from various units, departments, disciplines, crafts, etc. Interview findings will be treated in a confidential manner. The names of personnel interviewed will not be included in the evaluators' field notes or on the CSR.

#### 4.9. Closing Conference

- 4.9.1. At the conclusion of the evaluation, a closing conference shall be conducted between the evaluation team and the Project/Super team. All items of concern

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identified during the evaluation must be reviewed with the Project/Super manager, or their designee, prior to the departure of the evaluation team. This is required to ensure a clear understanding of the evaluators' concerns, and is not intended to serve as an opportunity to debate the validity of these concerns. Recommended corrective actions may also be discussed during this conference. An informal list of items identified during the evaluation will be left with the Project/Super team to further confirm the items identified and to assist the site team in expediting corrective actions.

#### 5. CSR DISTRIBUTION

A formal Safety Evaluation Report will be issued by the Lead Evaluator within seven calendar days of the closing conference. Distribution will include the site management team and the Senior Leadership Team and HS management personnel. CSRs with an unusually high or low number of findings may be distributed to even higher levels of management. The Corporate HS Department will also include CSR results in monthly reports to management.

#### 6. CORRECTIVE ACTIONS

The project or office manager is responsible for ensuring that all items identified by the evaluation team are corrected. Most of the deficiencies identified during the CSR will have been corrected immediately and those prompt corrective actions will be noted on the CSR. However, some items may also need programmatic changes to correct the underlying cause(s) or may require involvement by third parties, such as clients, vendors, etc. The emphasis should be placed on corrective actions intended to eliminate the causes of the unsafe acts and unsafe conditions identified and not only on correcting the item identified. The project/office manager must prepare a written response to the evaluation report. The written Corrective Action Plan will include the responsible party and targeted completion date for each item listed on the CSR and must be submitted to the project/office manager's supervisor and to the Lead Evaluator within seven calendar days of the receipt of the CSR.

#### 7. FOLLOW-UP CSR

Based on the findings of their evaluation, the CSR team may determine that other situations may also require a follow-up CSR be conducted. Generally, locations with an unusually large number of deficiencies will be scheduled for a follow-up evaluation within the next 60 to 90 days. However, locations with only one or a few deficiencies of a more carious nature may also be considered for a follow-up CSR, at the discretion of the evaluation team. The evaluation team will discuss the potential of a follow-up CSR with the site management team during the closing conference, if a second evaluation is anticipated. If a follow-up CSR

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is ultimately determined to be required by the evaluation team, it will be noted in the written report. The proposed schedule for the follow-up CSR will be determined by the evaluation team, after discussion with the project team, and will be indicated in the cover letter of the written report.

#### **8. RECORDKEEPING**

Each project or office shall keep copies of their CSR history, including evaluation reports and the associated corrective action reports for each. The HS Department will also maintain copies of all CSRs generated by the Corporate HS Department. Records of CSRs should be kept for a minimum of three years.

#### **9. FIGURES**

Guidelines for Evaluator  
Project HS Checklist  
Medical Surveillance Questions for CSR

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#### Figure 1 Guidelines for Evaluator

##### General

Before beginning the evaluation process, please review the Safety Evaluation Report HSP and, in particular, the Purpose and Scope paragraphs.

Concerns identified during the evaluation that are not within the contractual responsibility of MAPP, and do not present an exposure to employees or subcontractors should be forwarded to the appropriate responsible party and are not to be included in the CSR.

The names of personnel interviewed will not be included in the evaluators' reports or on the CSR. If appropriate, the numbers of workers interviewed and their general classifications, e.g., two electricians, one foreman, etc., may be included. One-on-one interviews are preferred; however, small group interview sessions are acceptable. Workers shall be informed at the outset of the interview that their honest responses are critical to the quality of the evaluation and that information provided will be treated as strictly confidential. The objectives of this activity are to determine whether the workers are knowledgeable of the HS program elements and are active participants and to gauge the overall HS attitude and culture at the location.

All comments in the report must be factual and objective. Do not include any subjective comments or opinions stated either by the evaluator(s) or by the workers. Do not mention previous incidents or potential incident scenarios. If circumstances dictate, verbally review the situation with line management.

The evaluation should not be all negative. The objective is to report a factual and comprehensive picture of the current state of the overall HS program at the location. Use positive statements and observations, where appropriate. The cover letter shall also include positive observation's and emphasize the MAPP's overall policy with regard to providing a safe, healthful, and environmentally sound workplace.

If an imminent danger finding is made the deduction is noted in the appropriate category and the deficiency is also listed in the "Discrepancies That Require Immediate Response" section near the end of the CSR form, the immediate corrective action taken must be stated under "Action Taken". Also, a summary of any disciplinary action taken should be appended to the CSR, if appropriate.

References to state, Federal, or other regulatory standards shall not be listed on the CSR form.

##### Completion of CSR Form



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Both positive and negative items should be listed for each category, as identified during the evaluation. Generally, the more information and comments placed in the CSR document, the better the report will convey the actual conditions observed during the evaluation.

In the body of the CSR, describe any deficiency identified for a CSR category that is being evaluated. If none of the example items listed for a category apply to the location being evaluated, state or comment section for that category. Also, in the CSR Scoresheet at the end of the CSR form, the check-box for that category should be unchecked. This will automatically remove that category from the scoring calculation.

#### Risk Assessment Index

<u>Severity</u>						
1	Low	Probability	<u>Deduction Matrix</u>			
2	Medium		Severity			
3	High			1	2	3
<u>Probability</u>			1	2	2	5
1	Low		2	2	5	10
2	Medium		3	5	10	10
3	High					

Deductions for uncorrected findings or repeat deficiencies reported in previous CSRs should be raised to the next higher level of deduction, e.g. 2 to 5, 5 to 10, 10 to 20. Such findings will be identified as recurring items in the “Describe Deficiency” section.

Each category contains example evaluation questions to guide the evaluator. Each of the items listed as examples should be reviewed, as applicable to the location. Since some items may fit into either of two categories, Lead Evaluators shall use their judgment to determine which category is most suitable for each item.

The evaluator should provide either an entry or a “Not Applicable” comment in all shaded areas of the form. No sections shall be left blank.

If a subcontractor is associated with an identified deficiency, it is helpful if the subcontractor’s name is provided along with the description of the deficiency.

For scoring purposes, the evaluator may either cite multiple findings of the same type (e.g., eye protection, respirators not in use, fire extinguishers, eye wash stations, emergency showers, emergency lighting), as individual deficiencies or as a single program deficiency. Typically,

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multiple individual deficiencies are scored as minor or moderate, whereas a single program deficiency reflecting multiple findings is often scored as moderate or serious.

No matter how many infractions a category may have, no negative points should result in the CSR calculation page for that category. The lowest score any individual category should receive is zero.

Excel comment boxes with helpful guidelines for the evaluator have been provided for some of the cells in the worksheet.

Figure 2, Project HS Checklist, should be used as a source of examples when completing Documentation, Postings, and Signs, in the CSR worksheet.

Questions to aid in the evaluation of medical surveillance issues have been provided in Figure 4, respectively.

Field CSR form has been provided to allow evaluators to address unusual or unique HS hazards or issues. A Senior HS Manager must approve insertion of additional categories or other modifications of the standard CSR forms.

Increase spaces for listing discrepancies; be sure to insert Excel rows within the range of the total point's formula (within the existing rows) for that category to assure that the sum formula includes the newly added rows.

If the category was evaluated and scored, place a check in the box in the first column of the scoresheet, whether or not points were deducted. If the category was not evaluated, remove the check from the category box and the category will automatically become not applicable. Removing the check from the box automatically generates zero points possible and zero score for that category.

**Photographs**

If the evaluation team will be using photos to document their findings, and if approval has been secured from the location owner and the project/office manager, a third tab in the CSR workbook has been left available for pasting photographs. Each photo should be accompanied by a descriptive caption. As a general rule, documentation of unsafe conditions through photography may be acceptable, while documentation of unsafe acts would not be.

**Report Preparation**

It is suggested that the evaluator, who drafts the final report, ask another HS manager to review the final version of the CSR before distribution. As a final step, the evaluator is



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encouraged to delete unused rows to shorten the report and improve its appearance. After unnecessary rows have been deleted, the report can be saved and printed. A page break has been intentionally placed above the CSR Scoresheet page. The print range is not set to include column K.

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**Figure 2**  
**Project HS Checklist**

This checklist (US version) has been provided as an aid to be used for evaluation of site documentation and postings, which can be found as Category 22 on the Field CSR form.

Project Name:	Client:		
Project Location:	Project Number:		
Evaluation Performed By:	Date:		
<b>All jobsites must have</b>	<b>(Yes)</b>	<b>(No)</b>	<b>(N/A)</b>
OSHA Regulations 29 CFR 1910 and 1926			
Collection of corporate HS Procedures (HSPs)			
collection of MSDS			
A bloodborne pathogens exposure control plan			
<b>Assure that all jobsites have the following notices posted in an area frequently visited by all employees</b>			
Government-required posters. These may not apply in all States			
Employee Polygraph Protection Act /Americans With Disabilities Act/ Job Safety & Health Protection/ Equal Employment Opportunity /State Unemployment Insurance Benefits /State Notice Of Compensation To Employees			
Site evacuation procedures and routes			
Recent relevant incident reports/Safety Alerts/Lessons Learned/Safety Shorts			
Emergency telephone numbers (1926.50)			
Crane hand signals (1926.550)			
<b>Documentation</b>	<b>(Yes)</b>	<b>(No)</b>	<b>(N/A)</b>
OSHA 300 Log (1904)			
First aid log (1904)			
Weekly HS meetings			
Accident/incident investigation reports			
Control Access Plan			
Medical Services and first-aid (1910.151; 1926.50)			
Aerial lift inspection (quarterly, 1910.67, 1026.453)			
Aerial lift operator qualification (1910.67; 1926.556)			
Come-along/chain fall inspection (1926.552)			
Crane inspections (annual, 1910.180)			
Crane operator qualification (1910.180; 1926.550)			
Drum hoist inspection (monthly, 1926.553)			
Electrical equipment inspection (1926.431)			
Electrical equipment inspection designated competent person			
Excavation daily inspections (1926.651)			
Excavation inspection competent person (1926.650)			
Explosives and blasting agents training (1910.109; 1926.901)			
Fall protection equipment inspections (quarterly minimum)			
Fall protection designated competent person (1926.500 – 503; 1910.66)			
Fall protection training (1926.500 – 503; 1910.66)			
Fire extinguisher training (1910.157, 158, 179)			



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Fire protection equipment inspection (1910.157)			
Forklift inspections (daily and monthly, 1910.178)			
Forklift operator qualification (1910.178; 1926.602)			
Powder-actuated tool operator certification (1926.302)			
Scaffold builder training (1926.451)			
Scaffold inspection designated competent person			
Sling and wire rope inspection (monthly, 1910.184; 1926.251)			
Sling and wire rope inspection designated competent person (1910.184; 1926.251)			
Storage/handling of LP gas (1910.110)			
<b>Medical surveillance program</b>			
Written site-specific health & safety program (PSSP)			
Local Hospital and Occupational Clinic Identified			
Emergency response procedure, Chain of command Identified			

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#### **Figure 4** **Medical Surveillance Questions for CSR**

Does medical surveillance address regulated chemicals requirements?  
Are surveillance protocols based on chemical risks?  
Do the First Aid personnel have required training?  
Are the First Aid kits' contents consistent with regulations?  
Are medical records maintained in secure files with limited access?  
Does MAPP have access to project medical files for our employees?  
Does the MAPP Occupational Health Services staff provide direct support in the management of the medical surveillance program?