

## Clearheart Construction Co., Inc.

### Subcontractor Management Plan (SMP)

#### SUBCONTRACTOR MANAGEMENT PLAN (SMP)

It is our responsibility to review the safety efforts made by subcontractors who may be working with us.

All subcontractors with whom we may work will be **pre-qualified** by reviewing their safety programs, safety training documents, and safety statistics.

Raw safety metrics (measurements) would include:

1. A written safety program.
2. Safety training documentation/certification.
3. Documented safety meetings.
4. Documented job site inspections.
5. Documented enforcement policy and procedures.
6. A demonstration of management's commitment to safety.
7. A demonstration of their ability of doing the type of work for which they are being hired which would include insurances, licenses, equipment (or the ability to rent equipment), etc..
8. 10 & 30 hour OSHA training as well as any formal or on-line training for which successful completion results in a certificate of training.
9. The past three years of accident and injury reports.

While the above could be considered a commitment to safety, they are actually "trailing safety indicators" because they do not indicate, in and of themselves, whether safety procedures are followed in practice.

**Acceptable safety metrics** are **measurable** "leading safety indicators" because they can prevent accidents and injuries in the future.

1. Are accidents/injuries trending downward as a percentage?
2. Are near miss accidents reported and procedures implemented to prevent them?
3. Is the seriousness of an incident quantified?
4. Are indirect costs of an injury/accident/illness quantified?
5. Are risk management procedures applied?

6. Are documented questions and comments found with safety meetings? This is a measurable statistic.
7. Is the percentage of employees taking advanced training increasing?

Prior to initiation of work, a pre-job meeting and safety orientation will be held with all subcontractors to apprise them of the protective measures we have determined to be appropriate. At this meeting, all safety requirements of the contractor for whom we are working will be conveyed to our subcontractors. If permitted, our subcontractors will attend all safety orientation meetings provided by the contractor for whom we are working.

Input and suggestions from subcontractors will be solicited. Attention will be given to hazards one subcontractor may create and the measures they will take to prevent other subcontractors from these exposures. One measure that will always be taken is the sharing of appropriate Material Safety Data Sheet information.

The below four major elements of safety management that apply to our operations also apply to our subcontractors:

- a. management commitment and employee involvement.
- b. hazard analysis.
- c. hazard prevention and control.
- d. safety & health training.

Subcontractors who are working for us must attend regularly scheduled documented safety meetings conducted by our competent persons.

Subcontractors who are working for us must conduct regular and frequent job site inspections and may document these inspections using our safety inspection checklists or their own.

At the completion of each job, a post-job safety performance review of our personnel as well as the subcontractor's personnel will be completed to ensure that all potential deficiencies are eliminated

### **JOB HAZARD ANALYSIS** **OSHA Booklet 3071 Job Hazard Analysis**

All employees and all subcontractors will read the above OSHA Booklet 3071, Job Hazard Analysis and use the information contained therein to complete our Job Task Safety Analysis Forms which are located with our job site forms within our project manuals.

Using the above referenced booklet and other training materials, employees and subcontractors will be trained in the hazard identification process.

The formal process to identify potential hazards is as follows:

1. A Certificate of Workplace Hazard Assessment will be prepared, signed and dated, by the PPE Program Administrator, indicating that a hazard assessment of our job sites and methods of operations has been accomplished. This hazard assessment will focus on the need for PPE which can not be eliminated through engineering or administrative controls.
2. Because they have insight to the hazards involved, employees and subcontractors who actually perform job tasks will be included in job hazard analysis.
- 3 A review will be made of previous accidents and injuries as well as “near-misses” to determine if existing hazard controls are adequate or need improvement.
4. In discussion with employees and subcontractors, ideas to eliminate hazards will be discussed and formalized for inclusion on our job task safety analysis form which follows this page.
5. Hazards associated with various tasks will be ranked and prioritized with the jobs that possess hazards that present unacceptable risks, based on those most likely to occur and with the most severe consequences identified for first priority for analysis.
6. The job task safety analysis form will be completed for each task and, as a matter of course, hazard identification will be performed on all job tasks, both routine and non-routine, before actual work is performed. Hazard identification would be prepared for new processes, changes in operation, products or services, as applicable.

Through frequent and routine job site inspection, review of incidents [or lack thereof], and employee and subcontractor feedback, the above will insure that the identified hazards are mitigated. Should problems occur or a potential risk/hazard be discovered, work will stop until the job task hazard analysis form is adjusted to correct any deficiencies found.

The above review process will take place on all job tasks to ensure that new hazards were not created while eliminated others.