



September 21, 2021

Policy

## Section 9.0 Policy

### 1.0 Introduction

Inspections are a key management tool and an opportunity for people to participate in controlling the hazards in their own work areas. They are also an essential component of a continuous improvement program which significantly contributes to preventing loss. Continuous performance improvements are made through the consistent examination of worksite conditions, equipment, tools, etc. In addition, inspections help ensure worker compliance to corporate, client, industry and legislated standards.

### 2.0 Scope

Strike will follow the requirements specified in this policy, which includes formal and informal worksite and facility inspections, evaluations, audits and observations. This policy applies to all employees including contract employees (ISPs) and subcontractors supervised by Strike employees. Where deficiencies are noted during an inspection, appropriate corrective actions will be identified and implemented in a timely manner.

As Strike performs work under numerous jurisdictions and clients, workers, supervisors and management representatives need to be familiar with applicable provincial and federal regulations.

Planned health, safety and environmental inspections, evaluations, audits, and observations involve:

- Systematically assessing Strike facilities, worksites, operating practices, equipment, tools, and materials.
- Assessing how employees follow existing standards; whether they are company, client, industry or legislated.

### 3.0 Objectives

The objectives of this policy include the following:

- Identify deficiencies in tools, equipment, vehicles or worksite conditions
- Identify potentially at-risk behaviours and actions
- Recognize and reinforce positive behaviours
- Identify existing or potential health hazards and concerns
- Identify existing or potential environmental hazards and concerns
- Monitor the implementation and effectiveness of previously identified recommendations
- Identify actual or potential hazards arising during the project lifecycle

### 4.0 Key Policy Statements

- An effective inspection/evaluation program requires active participation by all levels of the organization
- Inspections/evaluations are a proactive tool to prevent loss and are intended to drive continuous improvement
- Training in applicable processes and resources will be provided to appropriate personnel

APPROVED:

A handwritten signature in black ink, appearing to be "S. Smith", is written over a horizontal line.



## **Section 9.1 Definitions**

### **1.0 Assessment**

A formal or informal process which can include inspections, evaluations, audits, or observations.

### **2.0 Audit**

A formal assessment of a system or program against an established standard.

### **3.0 Corrective Action**

A step taken to address identified deficiencies.

### **4.0 Evaluation**

A formal or informal process used to identify and assess the effectiveness of program implementation.

### **5.0 Inspection**

A formal or informal examination to identify and mitigate existing or potential hazards associated with equipment, vehicles, facilities, materials, housekeeping, work processes, etc.

### **6.0 Observation**

The action or process of examining a process, task, or worker to identify potential at-risk or safe actions/behaviours.

### **7.0 SOC**

Safety Observation Card, used to document and communicate safe or at-risk conditions, behaviours, actions, and near misses.



## **Section 9.2 Responsibilities**

It is the responsibility of all Strike personnel to ensure inspections, evaluation, audits and observations are conducted and supported effectively on behalf of Strike.

### **1.0 Employee/Worker Responsibilities**

It is the responsibility of each employee/worker to:

- Participate and cooperate in the inspection process; where applicable
- Participate in the development and implementation of corrective actions; where applicable
- Become familiar with posted inspections and applicable corrective actions
- Participate in the Safety Observation Process (SOC) to help identify and communicate hazards, behaviours and/or actions

### **2.0 Supervisor Responsibilities**

It is the responsibility of Supervisors (Superintendents, Foremen, and Leads) to:

- Lead, participate, and cooperate in the inspection process
- Become familiar with Site Specific Safety Plan (SSSP), Construction Execution Plan (CEP) and client requirement for inspection frequencies
- Take a leadership role in the development and implementation of corrective actions
- Monitor the effectiveness of applicable corrective actions
- Communicate inspection findings, corrective actions and key learnings to workers
- Participate in the Safety Observation Card Program (SOC) to help identify and communicate hazards, behaviours and/or actions
- Investigate violations identified through the SOC program and follow up according to company policy

### **3.0 Line Management Responsibilities**

It is the responsibility of Line Management (Area Managers, General Managers, Project Managers, etc.) to:

- Lead, participate and cooperate in the inspection process
- Become familiar with Site Specific Safety Plan (SSSP), Construction Execution Plan (CEP) and client requirement for inspection frequencies
- Communicate expectations regarding inspection types, participants and frequency
- Provide resources and training in order to effectively carry out inspections and corrective actions
- Take a leadership role in the development and implementation of corrective actions
- Review and approve inspections and corrective actions
- Monitor the effectiveness of corrective actions
- Communicate inspection findings, corrective actions and key learnings
- Oversee and participate in the Safety Observation Program (SOC) and follow up on outstanding action items
- Investigate violations identified through the SOC Program and follow up according to company policy



#### **4.0 Senior Management Responsibilities**

It is the responsibility of Senior Management (Executives and Vice Presidents) to:

- Set and review policy with respect to inspections
- Ensure the effective implementation of the inspection process
- Provide resources in order to effectively carry out inspections and corrective actions
- Review and approve inspections and applicable corrective actions
- Monitor the effectiveness of applicable corrective actions
- Oversee and participate in the Safety Observation Program (SOC)

#### **5.0 HS&E Department Responsibilities**

It is the responsibility of the Health, Safety and Environment department to:

- Advise, mentor and assist on the interpretation of this Section
- Facilitate, participate and cooperate in the inspection process
- Become familiar with Site Specific Safety Plan (SSSP), Construction Execution Plan (CEP) and client requirement for inspection frequencies
- Take a leadership role in the development and implementation of corrective actions
- Review applicable inspections and corrective actions
- Monitor the effectiveness of corrective actions
- Participate in the Safety Observation Program (SOC)
- Communicate inspection findings, corrective actions and key learnings to workers

#### **6.0 Health and Safety Committee Responsibilities**

Representatives from applicable Health and Safety Committees are responsible to:

- Participate and cooperate in the inspection program
- Review the development and implementation of corrective actions
- Monitor the effectiveness of applicable corrective actions
- Communicate key inspection findings, corrective actions, trends and learnings



## Section 9.3 Assessment Types & Frequencies

### 1.0 Formal/ Planned Process

This preplanned approach utilizes formalized tools (i.e. checklists) and resources. These are documented, contain specific items for review and allow for formal corrective actions. This approach may consist of a team with specialized knowledge or diverse backgrounds. The formal nature reduces the chances of overlooking deficiencies, and educates on standards. These reports can be shared throughout the organization and corrective actions can be tracked and monitored.

### 2.0 Inspections - Strike Facilities, Field Worksites

- Include a variety of equipment, tools, materials, etc. during the inspection, i.e. don't focus solely on housekeeping or PPE compliance.
- Record findings as discovered, whether corrected immediately or not.
- Inspection frequency – once per quarter (BU/facility), once per month or as per SSSP (field worksite).

### 3.0 Inspections - Equipment/Vehicles

- All powered equipment must be inspected and maintained as per manufacturer's instructions.
- All powered equipment must be inspected daily and documented on appropriate checklist and submitted to supervisor.
- All vehicles should be inspected as per FSJM requirements.

### 4.0 Inspections - Cranes and Lifting Devices

- Cranes with a lifting capacity greater than 2,000 kg require daily inspection documented using log book
- Any deficiencies or maintenance must be documented in the log book and reviewed before crane use
- Annual testing and certification is required on all lifting devices (i.e. fixed overhead cranes, mobile cranes, pickers, chain hoists, slings, etc.)

### 5.0 Inspections – Hand and Power Tools

- Hand and small power tools should be inspected as per manufacturer's instructions (e.g. daily, before each use, etc.)

### 6.0 Inspections - Personal Protective Equipment (PPE) & Specialized PPE

- PPE should be inspected before use, and as per HSEMS Section 6.

### 7.0 Inspections - Fire Extinguishers

- All fire extinguishers must be inspected monthly and recorded on tag
- All fire extinguishers must be recertified annually by a certified service provider
- Refer to Strike SWP-05 (Fire Extinguishers) for more information



### **8.0 Evaluations/Audits**

Evaluations and internal audits are valuable processes by which Strike evaluates adherence to its HSEMS, safe work practices, safe job procedures, site specific safety plans (SSSP's), etc.

Audits are completed as part of the Certificate of Recognition (COR) maintenance process by certified auditors, as well as by client representatives.

### **9.0 Leadership Tours**

Worksite and facility leadership tours are high-level reviews conducted directly by Management of work processes, conditions, behaviours, etc. to evaluate conformance with HSEMS, safe work practices, safe job procedures, site specific safety plans (SSSP's), etc. They also help reinforce positive behaviours and actions, and reaffirm Management's commitment to safety.

### **10.0 Observations**

The process of work and worker observations allows management, supervisors and workers to observe and discuss proper or improper practices and conditions; and, identifies the corrective action to be taken where necessary. Observations are to human performance what inspections are to physical workplace conditions.

Observations are a valuable activity for evaluating the degree to which worker behaviours are up to the desired standard(s). They provide essential feedback regarding effective job placement, orientation, training, on-the-job instruction, mentorship, and communication. Observations can be supervisor to worker, worker to supervisor, or worker to worker.

Observations are documented at Strike through the Safety Observation Card (SOC) program. The SOC program is a proactive process designed to identify and formally document near misses, safe and/or at-risk conditions, actions or behaviours in the workplace. All workers, sub-contractors, supervisors and management are expected to participate.

Observations are most effective if they involve a discussion of the observed behavior, whether reinforcing positive behaviours or conditions, or correcting at-risk behaviours or conditions. Observations should be shared in a professional and constructive manner, with the intent of learning, improvement, and reducing risk.

Names can be included on the card, but in sensitive situations, they should be omitted, as the goal is to correct the situation, not to assign blame.

SOC's are to be reviewed at tailgate and safety meetings on a regular basis, as a means of sharing the observation, increasing awareness and communicating corrective actions.

### **11.0 Trending Observations**

Using Strike's approved methodology, is a way to gain more insight into the challenges and opportunities that the SOC program identifies. It also allows the sharing of learnings across job sites, business units and business lines throughout the organization.

### **12.0 Client and Regulatory Inspections/Audits**

Client and regulatory inspections may occasionally occur on Strike worksites. Strike personnel will comply with any reasonable request by clients and regulatory bodies and assist as required. The results of client and regulatory inspections, and associated documentation, should be shared with Strike management and HSE personnel.



### 13.0 Informal/ Unplanned Process

The informal process does not require formalized tools (i.e. checklists) or resources. An example of an informal process is a visual inspection of a harness. This process requires less time and effort but can have an immediate impact. Note that the informal process may lead to oversights and lack of follow up.

The following key points help facilitate an effective assessment:

- Conduct each assessment type at the appropriate frequency.
- Select and recruit team members as appropriate. The team should include a cross-section of supervision, management, and front-line worker(s). For example, a work site inspection could be conducted by an area manager, foreman, and worker. There is also a benefit in changing the members of the team regularly.
- Management personnel involvement (i.e. Manager, Superintendent, VP or HSE Representative) allows for direct assessment of deficiencies, challenges, etc. and improves commitment toward mitigation measures and resources.
- Joint inspections and leadership tours between Strike and the owner/client are effective in bolstering cooperation and identifying/solving problems together.
- When management and supervisory personnel are involved, they should pay close attention to behaviours for adherence to standards, and commend/correct where appropriate. When management representatives fail to intervene when violations or erosions of standards are observed, it may be interpreted as "silent approval".
- Reinforce positive behaviours/actions – workers observed following safe working practices (i.e. proper load securement) should be commended by acknowledging the behaviour/action, i.e. recognizing desired behaviours encourages similar behaviours in the future and reinforces safe work practices.
- Take time to engage with workers on the job site as you complete the assessment, which allows workers to share concerns, including those that may not be readily observable to the inspection team, and demonstrates the commitment of the inspection team.
- Ensure site access requirements (orientation, A&D, etc.) are met ahead of time.
- Wear all applicable PPE prior to starting the assessment.
- Conduct the inspection using a systematic approach, e.g. start at one side of the site and work across.
- During assessments on larger sites, it is acceptable to inspect a sample of equipment, vehicles, etc. and then a different subset on subsequent inspections.
- Take photographs during the inspection, of both positive conditions, as well as deficiencies. These help provide context for both Strike and client management reviewing the inspection report. NOTE: Take photos only where it is safe to do so, and only with the prior approval of the person in charge of the worksite (e.g. Strike Superintendent/foreman, client representative, etc.).
- Share initial inspection findings with site supervision before leaving site and follow up with subsequent report.
- Thank all personnel involved.



## Section 9.4 Document Management & Corrective Actions

### 1.0 Electronic Incident Management System

Strike utilizes an online system for tracking its incidents, as well as for its proactive assessment activities, such as inspections, evaluations, on-site reviews, etc. This program allows for:

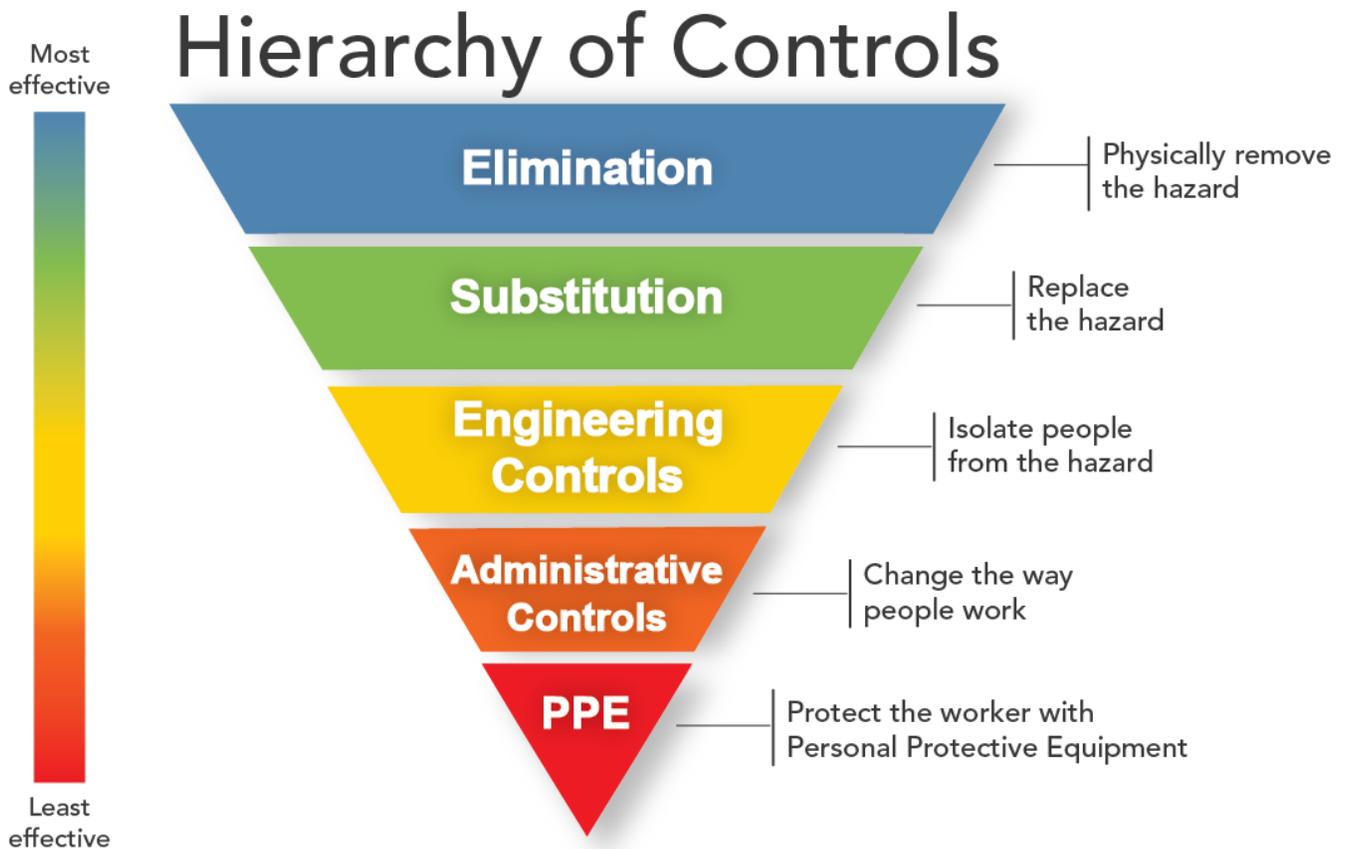
- Reporting of inspections, evaluations, leadership on-site reviews
- Reporting on the status of inspections and evaluations, findings and corrective actions
- Tracking completion of corrective actions and sign offs
- Trending

### 2.0 Corrective Actions

During inspections, evaluations, audits, and observations, when deficiencies are noted, mitigation measures should be enacted. These are called corrective actions.

### 3.0 Hierarchy of Controls

Corrective actions should follow the hierarchy of controls as closely as possible to ensure maximum effectiveness. In some cases, multiple control methods can be used.





Corrective actions should be developed by the assessment/inspection team, rather than one person in isolation. This helps ensure that reasonable actions are proposed, and buy-in in implementing the changes. It also helps assess whether the implementation of a corrective action might inadvertently introduce a new hazard.

Any corrective actions developed should follow the SMART criteria:

**S** – Specific. Actions should be relatively specific. Avoid general statements like “Improve housekeeping.” A more appropriate example would be “Recycle pallets in SW corner of shop.”

**M** – Measurable. Establish concrete criteria for measuring progress and completion. For example, “Recertify shop crane.”

**A** – Achievable. Actions should seek the best means of correcting the deficiency following the hierarchy of controls within the constraints of budgets, schedule, personnel, etc.

**R** – Realistic. Actions should be reasonable and practical. For example “Grade yard to remove trip hazards” versus “Pave yard to remove trip hazards.”

**T** – Timely. Action deadlines should be set in accordance with the complexity, cost, personnel required, etc. which create a practical sense of urgency. For example “Recertify shop crane by September 1” versus “Recertify shop crane when work slows down.”

The assessment may identify multiple deficiencies that have different levels of importance (priority) in being corrected. When prioritizing deficiencies:

- Evaluate the risks that require further attention - to estimate the inherent risk, assess two factors: potential severity, and probability or likelihood that the deficiency will create an incident.
- When a hazardous condition or situation with a high risk or imminent danger is discovered, take action immediately. Implementing immediate temporary measures reduces the probability of an incident occurring and are useful until a permanent correction can be implemented, e.g. tagging a crane out of service until it can be repaired.
- Evaluate short-term versus long-term corrective actions, e.g. apply sand to ice at SW corner of shop versus relocate roof downspout.
- Communicate the findings to the applicable personnel – mechanic, supervisor, area manager, etc.

**4.0 Follow-up**

To ensure corrective actions are performed in a timely manner, leadership personnel should verify that corrective actions have been completed. In addition, leadership personnel should validate that the applicable corrective actions have achieved their intended purpose.

**5.0 Inspection Types**

- |                                |                            |
|--------------------------------|----------------------------|
| 1. Equipment/Vehicle           | Form CF-S-36               |
| 2. Portable fire extinguishers | Form CF-S-17               |
| 3. Construction Equipment      | Form CF-S-18 (A through E) |
| 4. Worksite Safety Inspection  | Form CF-S-19               |
| 5. Scaffolding                 | Form CF-S-25               |
| 6. Harness/Lanyard             | Form CF-S-27               |
| 7. Rolling stock vehicles      | Form CF-S-47               |



**INSPECTIONS, EVALUATIONS, AUDITS & OBSERVATIONS**

**Section 9.4**

September 18, 2020

**Document Management & Corrective Actions**

- |  |              |
|--|--------------|
| 8. Business Unit/Strike Facility   | Form CF-S-49 |
| 9. Office  | Form CF-S-52 |
| 10. NSC Daily Inspection   | Form CF-S-55 |
| 11. Respiratory Protective Equipment                                       | (SWP/COP-02) |
| 12. Hand tools, power tools and small miscellaneous construction equipment | Informal     |
| 13. Load-bearing components of mobile cranes and boom trucks               |              |



## **Section 9.5 References**

### **1.0 SWP/COP-02 Respiratory Protective Equipment (safe selection/use/care)**

#### **2.0 Applicable Forms**

- CF-S-17 Portable Fire Extinguisher Inspection Monthly Checklist
- CF-S-18 A through E Construction Equipment Daily Pre-Start Checklist
- CF-S-19 Worksite Safety Inspection
- CF-S-22 Stop Work Order
- CF-S-25 Scaffold Checklist
- CF-S-27 Harness/Lanyard Checklist
- CF-S-36 Vehicle/Trailer Service Report
- CF-S-39 Do Not Use Tag
- CF-S-47 Vehicle Pre-start Inspection
- CF-S-49 Facility Inspection
- CF-S-50 HSE Evaluation
- CF-S-52 Office Inspection
- CF-S-55 NSC Daily Inspection
- CF-S-67 Leadership Onsite Review