Policy

WEM has adopted this Behavior-based Safety Program for the safety of our employees and help prevent occupational injuries and illness.

The elements of our program consist of:

- Common Goals Employee and Managerial commitment to the process
- Creating a systematic, ongoing process that defines a set of behaviors that reduce the risk of work-related injury, derived from safety assessments
- Training personnel in the Observation Process
- Observation and data collection on the frequency of critical safety practices
- Feedback and reinforcement to encourage and support positive safety practices
- Action Plan Team meetings to decide on how to proceed, based on the data
- Review Monitoring the progress of the Action Plan on a regular basis

Observation

A critical element in our Behavior-based Safety (BBS) Program depends on site observation. Site observation includes direct and open communication with the employees involved. The observer will:

- Meet with the worker at the site and introduce himself and the job being done
- Observe and monitor the worker, noting his safe behaviors
- Monitor the At-risk behaviors the worker is putting himself in

Observation Process Training

Training in the observation process will be established and implemented to the proper personnel. These individuals will be experienced employees of the Company. Training will consist of either classroom or on the job training.

Elements of the Training Program include:

- Who is to be trained
- Ensuring employees know the basic elements of the Behavior-based Program
- Ensuring that all employees involved in the process are trained in the classroom or on the job

The types of training that will be provided are:

- Management training: to ensure the common goals and process of the program are being met
- New employee training: effectively communicating the program to all employees
- Refresher training: to be performed as needed or when changes are made to the policy or procedure of the program

This training will include:

- Program objectives and incident report reviews
- How to conduct site observations
- The observer's knowledge of the job procedures they observe
- Knowledge of the correct work and safety procedures involved
- How to complete the observation form
- How to determine and analyze At-risk behaviors
- Feedback training and role play (mentoring and coaching)- Employees should be aware they
 may be observed at any time

This training process will be documented to keep on record those qualified to observe on site behaviors and effectively implement the program's elements.

Feedback

Communication is a crucial element in a successful Behavior-based Safety Program. To effectively accomplish this, feedback is of key importance.

The observer will start by commending the safe behavior the worker was doing during his work. You then want to explain, one by one, the At-risk behaviors the worker was doing. Then the observer asks the worker why he was putting himself at risk. For example, if the worker is welding a piece of metal and the sparks are flying in the workers direction. The observer would then ask the worker why he was not wearing protective clothing, like a flame-retardant apron.

At this time the observer and worker will discuss the at-risk behaviors until the worker agrees to try the suggested recommendation made by the observer. The worker might be aware of his at-risk behavior or maybe not. The worker may be doing the at-risk behavior for a long time.

The Observer's job here is to highlight this behavior, then explain the associated negative consequences with this behavior. The above discussion and agreement are the individual feedback which helps the worker to change his behavior. This feedback is considered as a form of reward since:

- The worker got commendable comments on his safe behavior.
- The worker understood his at-risk behavior without being reprimanded at site or reported to his superiors for further penalties.

Key elements for the observer to remember during the feedback process are:

- Reviewing the observation with the employee
- Start with positive comments on behavior and procedure
- Reinforce these behaviors
- Describe and discuss the unsafe portions observed
- Determine the reasons for the unsafe actions with open-ended questions to the worker

Re-emphasize that there are no negative consequences at this stage, so long as the observer and worker agree on the change of behavior.

Data Collection

At the end of the observation, the Observer will:

- Fill out an Observation Form with the safe and at-risk behaviors he noticed
- Record the date, time and location of the observations
- Note the workers comments and reasons for the at-risk behavior
- Record recommended safe behavior

The worker's name or identification number are not noted in the Observation Form.

- These Company forms will be used by WEM to summarize the observation process.
 Recording this interaction is important for later detailed analysis by the committee in charge of the program
- Data gathering and the Observation Form will be gathered and entered into an electronic database. Reports will be generated for the committee to analyze at risk behavior trends
- Information taken from the observation and feedback phase of the program will be compiled in useful data and implemented in the action plan

Elements of the Action Plan

To address unsafe behaviors WEM will construct its action plan based on observation reports, trend analysis and recommendations from the observers and employees. The HSE Manager is responsible for the procedures of the Action Plan.

Action planning will include:

- Regularly scheduled meetings to analyze Behavior-based report findings
- Evaluating unsafe behaviors
- Designating responsible parties and time frames to complete the Action Plan
- Ensuring support of management

The committee will:

- Produce a set of recommendations to correct employees' behavior
- Recommendations may be as simple as providing Personal Protective Equipment (PPE) to workers in certain locations, or increase work force in another location
- Some of the recommendations require site modification or costly machinery. Such recommendations are sent to top management for necessary approvals

The committee's responsibility is to ensure that recommendations will:

- Change the at-risk behaviors at the targeted location
- Eliminate hazards and risks caused by hardware or wrong design

Follow-Up

Any Action Plans set out by WEM at the direction of the HSE Manager will be completed in a time frame agreed upon by the entire committee.

Regularly scheduled meetings will be held to:

- Assign responsibility for the completion of the Action Plan
- Ensure that the guidelines of the Action Plan are being carried out
- To document the Action Plan and its progress

Behavior-Based Safety Program Employee Training Form

I have read or been informed of the Behavior-Based Safety Program and its elements.

- I am aware of the company's Safe Work procedures including the company's Code of Safe Practices.
- I understand that I may be observed in mu job performance or assigned task by a designated observer and that this person may or may not inform me that I am being observed.
- I understand that the observer may communicate to me or my supervisor or other company
 personnel the positive and at-risk behaviors I may display on completion of his / her
 observation.
- I agree to do my utmost to implement any of the observer's recommendations to improve my performance and safety.
- I understand that my cooperation and communication is key to the success of the Behavior-Based program.
- I agree to follow the procedures of any Action Plan as set out by Company.

Employee Signature	
Date	

Behavior-Based Safety Training Form

Trainer's Name				
Date				
Trainee's Name				
Training Type	☐ Initial Training ☐ Refresher Training			
The trainer named above has been trained to observe the following jobs:				
		☐ Trained	☐ Not Trained	
		☐ Trained	☐ Not Trained	
		☐ Trained	☐ Not Trained	
		☐ Trained	☐ Not Trained	
		☐ Trained	☐ Not Trained	
		☐ Trained	☐ Not Trained	
		☐ Trained	☐ Not Trained	
		☐ Trained	☐ Not Trained	
Trainer's Signature				
Date				

I understand that my training in the above listed jobs qualifies me to observe employees while doing their job(s), conduct feedback with employees(s) and implement the established goals of the Behavior-Based Safety (BBS) Program. I have also displayed the required knowledge in the following areas:

- Knowing the BBS Program objectives
- How to conduct observations
- Knowledge of the jobs being observed
- The correct safety procedures or these jobs
- How to identify At-Risk behaviors

Trainee's Signature	
Date	

Training Record

Trainer			
Signature			
Date			
	Content of	of Training	
	Attendees (p	olease print)	