### **Appendix A: Construction Safety Audit System**

Appendix A and B are not a part of the ANSI/ASSP A10.39, *Construction Safety and Health Audit Program*, but are included for information purposes only.

- **A.1** It is the responsibility of the construction employer to develop a sufficiently detailed safety and health program that is aligned with the project objectives and risk profile. The construction employer may develop the program itself or employ a program developed by others such as a contractor's association. Because of differences in the type of construction and work activities performed, flexibility is necessary and permitted in development of the safety and health program.
- **A.2** On multi-employer construction projects, the project constructor is responsible for development of a written construction safety and health program that will coordinate the activities of all construction employers. This is not to negate the responsibility of each construction employer to develop its own construction safety and health program.
- **A.3** Each construction safety and health program should contain a construction safety audit system as an integral part of the program. It is the responsibility of the construction employer and/or project constructor to develop and coordinate the implementation of a construction safety audit system.
- **A.3.1** The construction safety audit system should consist of two parts:
- **A.3.1.1** The first part should provide for an evaluation of the construction employer's construction safety and health program to determine how well the program fulfills the objectives of an effective safety and health program as addressed in ANSI/ASSP A10.33 and ANSI/ASSP A10.38.
- **A.3.1.2** The second part should provide for an evaluation of the implementation or execution of the construction employer's construction safety and health program to determine the degree to which actual behavior or performance complies with the performance requirements of the program.
- **A.4** A scoring system should be developed that will indicate how well the construction employer's construction safety and health program fulfills the requirements of an effective safety and health program and how well the program is implemented or executed. The scoring system should be designed to provide objective, reliable assessments of the content of the construction employer's construction safety and health program and of implementation or execution of the program.

There is no standardized scoring system. Each construction employer should develop its own scoring system because each construction employer has its own unique construction safety and health program. The scoring system does not have the objective of promoting comparisons between construction organizations, but comparisons within a firm over time. The goal of the construction safety audit system is to assist the construction employer in evaluating the firm's safety and health program and its implementation or execution of that program. Thus, the scoring system should reflect the construction employer's priorities. Certain performance requirements should be considered critical and this criticality should be reflected in the scoring system.

- **A.5** The auditor should examine records and documents maintained by the construction employer and conduct interviews and a thorough audit of work practices and work conditions, as necessary, to collect the information required to assess the level of performance of each performance requirement. The scoring system will be used to indicate the extent of compliance with the program.
- **A.6** The frequency of audits will vary. An audit of program content should be conducted whenever the program is changed. An audit of program compliance should be conducted on a regular basis.
- **A.7** A detailed report should be prepared by the auditor and submitted to the construction employer. The report should provide an assessment of the construction employer's construction safety and health program in terms of how well it meets the requirements of an effective program and how well the implementation or execution of the program complies with the program's requirements.
- **A.8** Results of safety audits should be reviewed with senior management, supervisors, and workers impacted by the scope of the audit.

# **Appendix B: Project Audit Guide**

Appendix A and B are not a part of the ANSI/ASSP A10.39, *Construction Safety and Health Audit Program*, but are included for information purposes only.

# CONSTRUCTION SAFETY AND HEALTH AUDIT PROGRAM AUDIT SYSTEM CRITERIA

EMPLOYER:
PROJECT/WORK SITE:
SENIOR OFFICIAL:
SAFETY MANAGER:
TYPE OF OPERATION:
NUMBER OF EMPLOYEES:
NUMBER OF SUBCONTRACTORS:
AUDITOR'S NAME/AFFILIATION/TITLE:
DATE OF AUDIT:
D. (12 01 7 (05))

#### Instructions

The purpose of this construction safety audit is to assess the employer's compliance with its construction safety and health program, which establishes specific performance requirements. How well those requirements are met will have a strong influence on the employer's safety and health performance in terms of accidents, injuries, illnesses, etc.

The audit is divided into several sections reflecting the employer's construction safety and health program. Each contains a series of statements about elements of the program.

Some performance requirements may be met by degree. In that case, a multi-point scale is used as follows:

Is a poster displayed conspicuously in each establishment informing employees of the OSH Act? Are other required documents posted?

If the poster has been displayed as well as all other required documents, you should answer yes and circle 2. If the poster and some of the other documents have been displayed, you should circle 1. If neither the poster nor the documents have been displayed, you should circle 0.

Some performance requirements are considered to be (CRITICAL). The importance of these items is shown by the scoring scale shown for the items. For example:

If a multi-employer job site, are inspections coordinated?

If this is a multi-employer job site and the inspections are coordinated, your answer would be yes and you should circle 2. However, if the inspections are not coordinated, your answer would be no and you should circle -2.

As you conduct the audit, read each statement and try to evaluate objectively the information that you obtain about the performance of each requirement.

## OCCUPATIONAL SAFETY AND HEALTH PROGRAM CRITERIA

SECTION I. Administration		Scores			
and	Policy/Program construction employer is required to develop and promulgate a clear concise occupational safety and health policy and program applicable work.				
1.	Is the policy clearly stated and communicated in language(s) so that all employees understand the priority of safety and health concerns?	No 0	1	Yes 2	N/A
2.	Are goals and objectives for the reduction and elimination of accidents and illnesses and/or loss of equipment and property, etc., clearly stated?	No 0	1	Yes 2	N/A
3.	Are the policy and program reviewed at least annually to evaluate their success in meeting the goal and objectives of the construction employer?	No 0	1	Yes 2	N/A
4.	Has a set of procedures been established providing for communication with employees that will permit the safety and health policy and program to be implemented effectively? Is it broadly implemented?	No 0	1	Yes 2	N/A
5.	Is the basic policy and program supported by guidance and instruction concerning organization, scope, responsibilities, functions, personnel, standards and awards?	No 0	1	Yes 2	N/A
6.	Are the safety responsibilities of assigned personnel established and delineated so all can participate fully in the safety and health program?	No 0	1	Yes 2	N/A
7.	Is there a policy for disciplinary action describing the steps to be taken for non-compliance of established safety rules, standards or practices by employees and/or supervisor?	No 0	1	Yes 2	N/A
8.	Does the senior management sponsor(s) attend safety meetings, and actively champion the safety message to the employees and supervisors?	No 0	1	Yes 2	N/A

9.	Does the safety and health representative attend staff meetings, schedule and progress meetings, and are they afforded the opportunity to present important safety and health matters for consideration (budget, major problem areas, etc.)?	No 0	1	Yes 2	N/A
10.	Are safety and health program priorities defined?	No 0	1	Yes 2	N/A
11.	Are priorities based upon problem areas identified through analysis of accident trends, mission changes, etc.?	No 0	1	Yes 2	N/A
12.	Have job descriptions outlining safety and health responsibilities and functions at all levels been published?	No 0	1	Yes 2	N/A
13.	Are specific duty requirements of safety personnel at all levels stated?	No 0	1	Yes 2	N/A
14.	Is there evidence that management requires all staff to coordinate safety and health matters with the safety and health team members?	No 0	1	Yes 2	N/A
15.	Are approved personal protective equipment, safety equipment and other devices necessary to protect employees available, maintained and used as required?	No 0	1	Yes 2	N/A
16.	Are employees authorized to use company time to participate in the safety program, including but not limited to, training, audits, inspections, and safety meetings?	No 0	1	Yes 2	N/A
17.	Are management and supervisory performances in meeting the requirements of the safety and health program evaluated in performance evaluations?	No 0	1	Yes 2	N/A
18.	Are copies of the safety and health program including but not limited to a chemical hazard communication program that includes safety data sheets and inventory listing.	No 0	1	Yes 2	N/A
19.	Are employee exposure and medical records and applicable safety and health standards made available to employees or employee representatives for review?	No 0	1	Yes 2	N/A

20.	Is the complete written safety and health program made available to each supervisor, safety and health committee member and employee representative?	No 0	1	Yes 2	N/A
21.	Are the essential elements of the safety and health program compiled in a condensed volume and distributed to all workers?	No 0	1	Yes 2	N/A
22.	Is a poster displayed conspicuously in each establishment informing employees of the OSH Act? Are other required documents posted?	No 0	1	Yes 2	N/A
B.	Staffing				
1.	Although it is difficult to establish absolute criteria for determining the size of staff needed to effectively implement an aggressive program, a review will be made, as part of the evaluation, of the hazards involved, complexity of operations, number of employees, diversification, equipment, etc., in order to determine staff requirements. In some instances, the size and complexity of operations may not warrant the appointment of full-time safety and health managers. In such cases, part-time or collateral duty personnel may fulfill program management functions. Are staffing assignments adequate?	No 0	1	Yes 2	N/A
2.	Each construction employer is required to designate a safety and health manager with adequate staff, funds and equipment to effectively administer the program. Are competent persons assigned?	No 0	1	Yes 2	N/A
C.	Authority, Responsibility and Funding				
1.	Do designated safety and health managers/directors possess sufficient authority and responsibility to plan for and assure funds for necessary safety and health staff, equipment, materials and training required to ensure implementation of an effective safety and health program?	No 0	1	Yes 2	N/A
2.	Does the project include appropriate financial and other resources? Is there a budget for: (If Applicable)				
	<ul> <li>a. sufficient personnel and administrative costs (e.g., training, inspections, etc.);</li> </ul>	No 0	1	Yes 2	N/A

b.	abatement of unsafe or unhealthful working conditions; (CRITICAL)	No -2		Yes 2	N/A
C.	safety and health sampling, testing and diagnostic and analytical tools and equipment, including laboratory analyses;	No 0	1	Yes 2	N/A
d.	necessary contracts to identify, analyze or evaluate unsafe, unhealthful working conditions and operations;	No 0	1	Yes 2	N/A
e.	program promotional costs such as publications, posters, films, awards or incentives, etc.;	No 0	1	Yes 2	N/A
f.	technical information, documents, books, standards, periodicals and publications;	No 0	1	Yes 2	N/A
g.	medical surveillance programs for employees? (CRITICAL)	No -2		Yes 2	N/A

## **Scoring Rationale – Administrations**

Scoring is based on each section A through C with a maximum score indicated and the permissible deviation level stated as a minimum acceptable score.

A. Maximum Score <u>44</u>	Minimum Score	Actual
B. Maximum Score <u>4</u>	Minimum Score	Actual
C. Maximum Score <u>16</u>	Minimum Score	Actual

SECTION II. Standards/Regulations			S	cores	
A.	Are all required standards/regulations complied with? Have variances, if required, been requested and approved?	No 0	1	Yes 2	N/A
B.	If new standards have been adopted by OSHA, A10, etc., are they incorporated into the written safety program and made known to all workers?	No 0	1	Yes 2	N/A
C.	Are other applicable federal standards required (e.g., Department of Energy, Environmental Protection Agency)? Are they complied with?	No 0	1	Yes 2	N/A
	Scoring Rationale – Standards/Regulations				
	No deviations from full compliance with this section are permitted. Section A and B provide for the manner of deviation from published standards.				
	Maximum Score 6 Minimum Score Actual				

Section III. Inspection and Abatement			Scores			
A.	Suitability of Safety and Health Inspectors/Inspections					
1.	Do inspectors possess the equipment and competence to recognize safety and health hazards?	No 0	1	Yes 2	N/A	
2.	Do inspectors have adequate time to conduct inspections?	No 0	1	Yes 2	N/A	
3.	Are daily, weekly and monthly (as required) inspections performed?	No 0	1	Yes 2	N/A	
4.	Are unannounced/follow-up inspections performed?	No 0	1	Yes 2	N/A	
5.	If a multi-employer job site, are inspections coordinated? (CRITICAL)	No -2		Yes 2	N/A	
В.	Conduct of Inspections					
1.	Preparation  a. Are inspector(s) provided all available relevant information pertaining to the safety and health of the workplace to be inspected, including safety and health hazard reports, injury and illness records, previous inspection reports and reports by employees of unsafe and unhealthful working conditions?	No 0	1	Yes 2	N/A	
	b. Do safety and health inspectors determine in advance the actual work procedures and conditions to be inspected, in order to have proper equipment available to conduct an effective inspection?	No 0	1	Yes 2	N/A	
C.	Post Inspection Audits (by outside authorities and consultants)					
1.	Were safety and health inspectors authorized to enter, without delay, and at reasonable times, any area where work is being performed?	No 0	1	Yes 2	N/A	
2.	If there were no employee representatives, did safety and health inspectors consult with a reasonable number of employees during walk-arounds?	No 0	1	Yes 2	N/A	

3.	Were safety and health inspectors authorized to talk to employees, perform testing and take photographs?	No 0	1	Yes 2	N/A
4.	Were safety and health inspectors familiar with imminent danger procedures? Could the procedures be, or have they been, applied? (CRITICAL)	No -2		Yes 2	N/A
5.	Did safety and health inspectors provide informal exit (post-inspection) conferences with the official-in-charge, employee representative and employees?	No 0	1	Yes 2	N/A
6.	Did inspectors, in writing and in a timely manner, describe with particularity the procedures followed in the inspection and the findings that form the basis for the instance of any Notice of Unsafe or Unhealthful Working conditions?	No 0	1	Yes 2	N/A
7.	Were procedures for the prompt issuance of Notices of Unsafe or Unhealthful Working conditions published and observed?	No 0	1	Yes 2	N/A
D.	Representatives of Officials-In-Charge and Representatives of Em	ploy	ees	•	
1.	Did inspectors interview supervisors, managers, and employees in private where applicable?	No 0	1	Yes 2	N/A
1.	·		1		N/A
	was a representative of the management and employees of the workplace given an opportunity to accompany safety and health	0 No		2 Yes	
2.	Was a representative of the management and employees of the workplace given an opportunity to accompany safety and health inspectors during the physical inspection of any workplace?  Did inspectors consult with employees concerning matters of safety and health to the extent necessary for an employee to have an opportunity to bring to the attention of the inspector unsafe or	No 0	1	Yes 2	N/A

2.	Are reports to supervision of existing or potential unsafe or unhealthful working conditions recorded on a log? Is this information sent to the appropriate safety and health committee, supervisors, and managers?	No 0	1	Yes 2	N/A
3.	Are inspections conducted immediately for imminent danger conditions, and within three working days for potentially serious conditions? Is this information sent to the appropriate safety and health committee, supervisors, and managers? (CRITICAL)	No -2		Yes 2	N/A
4.	Are employees immediately notified of inspection results initiated by employee reports?	No 0	1	Yes 2	N/A
F.	Accident/Incident Investigation				
1.	Are all accidents/incidents/near misses investigated?	No 0	1	Yes 2	N/A
2.	Are all accidents resulting in a fatality or the hospitalization of five or more employees <u>immediately</u> investigated to determine the causal factors involved? (CRITICAL)	No -2		Yes 2	N/A
3.	Are investigation reports forwarded to the senior management, safety and health committee, and safety and health managers?	No 0	1	Yes 2	N/A
4.	Are external reporting requirements being met as required by law? (CRITICAL)	No -2		Yes 2	N/A
G.	Abatement of Unsafe or Unhealthful Working Conditions				
1.	Are violations, where Notices of Unsafe or Unhelpful Working Conditions have been issued, abated within the time set forth in notices or in accordance with abatement plans?	No 0	1	Yes 2	N/A
2.	Are follow-up procedures for correcting unsafe or unhealthful working conditions established and observed?	No 0	1	Yes 2	N/A

## **Scoring Rationale – Inspection and Abatement**

A. Maximum Score \_\_\_ Actual \_\_\_\_

B. Maximum Score \_\_\_ Actual \_\_\_\_

C. Maximum Score \_\_\_ Actual \_\_\_\_

D. Maximum Score 6 Minimum Score Actual

E. Maximum Score 8 Minimum Score \_\_\_ Actual \_\_\_\_

F. Maximum Score 8 Minimum Score Actual

G. Maximum Score 4 Minimum Score Actual

Section IV. Safety and Health Committees (If Applicable)			Scores			
A.	Committee Organization					
1.	Does the safety and health committee have equal representation of management and non-management employees as members of record?	No 0	1	Yes 2	N/A	
2.	Do committee members serve overlapping terms?	No 0	1	Yes 2	N/A	
3.	Are committee meetings regularly scheduled?	No 0	1	Yes 2	N/A	
4.	Are advance notices of meetings distributed to management, committee members, and employees, and is each meeting conducted pursuant to a prepared agenda?	No 0	1	Yes 2	N/A	
5.	Are written minutes of each committee meeting maintained and distributed to each committee member?	No 0	1	Yes 2	N/A	
6.	Are committee recommendations followed up and documented in writing?	No 0	1	Yes 2	N/A	
B.	Construction Employer Responsibilities					
1.	Does the construction employer make available to committees information relevant and necessary to their duties (e.g., policies; safety and health program; human and financial resources available to implement the program; accident, injury and illness data; epidemiological data; employee exposure monitoring data; Hazard Communication Program; Safety Data Sheets; inspection reports; reprisal investigation reports; abatement plans; NIOSH Health Hazard evaluation reports; and internal and external evaluation reports)?	No 0	1	Yes 2	N/A	
2.	Are all committee members provided with training sufficient to allow them to understand and effectively serve in their roles?	No 0	1	Yes 2	N/A	

Actual \_\_\_\_

C.	Committee Duties						
1.	Does the committee monitor and assist in implementing the safety and health program, making recommendations to the official-in- charge on the operation of the program?	No 0	1	Yes 2	N/A		
2.	Does the committee monitor findings and reports of workplace inspections to confirm that appropriate corrective measures are implemented?	No 0	1	Yes 2	N/A		
3.	Does the committee review and recommend changes as appropriate to and to the appropriate level of management?						
	<ul> <li>a. procedures for handling safety and health suggestions and recommendations from employees;</li> </ul>	No 0	1	Yes 2	N/A		
	b. the level of resources allocated and spent on the safety and health program?	No 0	1	Yes 2	N/A		
Sco	Scoring Rationale – Safety and Health Committees						
A. IV	Maximum Score 12 Minimum Score Actual						

B. Maximum Score \_\_\_ Actual \_\_\_\_

C. Maximum Score 8 Minimum Score \_\_\_

Section V. Allegations of Reprisal				Scores			
A.	Employee Activity						
1.	restraint, interference, or report of an unsafe or u	hed to assure that no employ oercion, discrimination or rep nhealthful working condition, nd health program activities, e	risal for filing a or other	No 0	1	Yes 2	
2.	task because of a reaso	I the right to decline to perforr onable belief that there is insu nrough normal hazard reportion	fficient time to	No 0	1	Yes 2	
В.	Results of Investigation	ons					
	•	ommittee exists, was the safety and health activities regarding allegations of reprisal and ions thereof?		No 0	1	Yes 2	N/A
Items Com	pliance is mandatory. Ite	ons of Reprisal ve any permissible level of de m B has some level of interpr required in personnel action.					
A. N	laximum Score <u>4</u>	Minimum Score 4	Actual				
B. M	laximum Score <u>2</u>	Minimum Score1_	Actual				

Section VI. Training Scores **Training of Management Officials** Are superintendents, managers, foremen, engineers, etc., provided No Yes N/A orientation and other learning opportunities which will enable them to 1 2 0 participate in the safety and health programs and apply safety and health principles in their work? B. **Training Requirements** Is training, for all levels of management, crafts and competent No Yes N/A persons, provided where required by regulation and special identified 0 2 high hazard level activities? Are these training needs documented and maintained on a current basis? An example would be training for all involved when a permit program has been established. Other areas are scaffolding erection, trenching, hazard communication, etc. C. **Training of Safety and Health Specialists** 1. Are designated safety and health specialists provided training through Yes N/A No courses, laboratory experiences, field study and other formal learning 2 0 experiences to prepare them to perform technical monitoring, consulting, testing, inspecting, hazard recognition, evaluation and control, standards analysis, etc.? 2. Are safety and health specialists provided suitable refresher training N/A No Yes to maintain competency? 0 1 2 D. **Training of Safety and Health Inspectors** 1. Are inspectors provided training with respect to appropriate standards No Yes N/A and the use of appropriate equipment and testing procedures, as well 2 0 1 as the preparation of reports and other documentation to support inspection findings? 2. Are safety and health inspectors provided suitable refresher training N/A No Yes to maintain competency? 0 2 E. Training of Collateral Duty Safety and Health Personnel (Whose primary responsibility is not Health and Safety) and Committee Members

		l committee members provid signments/appointments?	ed training within	No 0	1	Yes 2	N/A
F.	Training for Employe	es and Employee Represe	entatives				
1.	Are employees and employee representatives provided specialized job safety and health training as appropriate? (Job Hazard Analysis, Manufacturers Operators Manual, Safety Manual, etc.)				1	Yes 2	N/A
2.	Are employees and employee representatives informed of the occupational safety and health programs (emphasis on their rights and responsibilities)?				1	Yes 2	N/A
3.	Are representatives of employee groups, such as recognized labor unions, provided both introductory and specialized courses and materials that will enable such groups to function appropriately in ensuring safe and healthful working conditions and practices in the workplace?			No 0	1	Yes 2	N/A
Sc	oring Rationale – Traini	ng					
A.	Maximum Score 2	Minimum Score	Actual				
В.	Maximum Score 2	Minimum Score	Actual				
C.	Maximum Score 4	Minimum Score	Actual				
D.	Maximum Score4_	Minimum Score	Actual				
E.	Maximum Score 2	Minimum Score	Actual				
F.	Maximum Score 6	Minimum Score	Actual				

Section VII. Recordkeeping and Reporting Requirements			Scores			
A.	Log of Occupational Injuries and Illnesses					
1.	Is a log of all occupational injuries and illnesses maintained as required by law?	No 0	1	Yes 2	N/A	
2.	Are occupational injury, illness or fatality reported to the safety committee and senior management on a prompt basis?	No 0	1	Yes 2	N/A	
3.	Are occupational injury, illness or fatality reported in accordance with policy and regulatory requirements?	No 0	1	Yes 2	N/A	
В.	Annual Summaries of Occupational Injuries and Illnesses					
1.	Is an annual calendar year summary of occupational injuries and illnesses compiled and posted if required?	No 0	1	Yes 2	N/A	
2.	Are occupational injury and illness reports updated and kept current?	No 0	1	Yes 2	N/A	
3.	Are occupational injury, illness or fatality events reported in accordance with policy?	No 0	1	Yes 2	N/A	
C.	Reporting of Serious Accidents					
1.	Are serious accidents reported to applicable regulatory agencies within the required timeframe?	No 0	1	Yes 2	N/A	
2.	Are accident/fatality investigations completed in a timely manner as required by regulatory agencies and company policy and distributed as necessary?	No 0	1	Yes 2	N/A	
D.	Locations and Utilization of Records and Reports					
1.	Is a log of occupational injuries and illnesses maintained at each project location? Is the log current?	No 0	1	Yes 2	N/A	
2.	Are logs (redacted as appropriate for privacy issues) and annual summaries available to the safety and health committee, employees, former employees and employee representatives, managers, and supervisors?	No 0	1	Yes 2	N/A	

E.	Retention of Record	s						
	medical records, expo regulatory agencies a	rts retained for five years?(losure records and SDS as reind company policy. See 29 Note: Some states require l	equired by CFR 1910.120 for	No 0 1	Yes 2	N/A		
F.	Construction Emplo	yer Annual Reports						
	Are annual reports prepared and submitted to management, safety committee and employee representatives? Does this report propose objectives for the next reporting period and suggested improvements?				Yes 2	N/A		
Sco	Scoring Rationale – Recordkeeping and Reporting Requirements							
A.	Maximum Score <u>6</u>	Minimum Score	Actual					
B.	Maximum Score <u>6</u>	Minimum Score	Actual					
C.	Maximum Score <u>4</u>	Minimum Score	Actual					
D.	Maximum Score <u>4</u>	Minimum Score	Actual					

E. Maximum Score \_\_\_ Actual \_\_\_\_

F. Maximum Score \_\_\_ Actual \_\_\_\_

Sec	tion viii. Safety and i	Health Participation			3	cores	
A.	Membership and Pa	articipation					
1.	safety and health rep	employer, members of the presentatives, etc., particip sociations and other group nts?	pate in local or national	No 0	1	Yes 2	N/A
2.	educate the public re	n employer have commun garding job activities and tect children in construction	hazards? (e.g., special	No 0		Yes 2	N/A
Sco	ring Rationale – Safe	ty and Health Participat	ion				
Α. Ι	Maximum Score 4	Minimum Score	Actual				