



OBSERVATION BASED SAFETY PROGRAM

SWP 19000-037

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Scope and Purpose

The Observation Based Safety Program is designed to support worker competency to identify and address hazardous conditions in the workplace, reinforce safe work practices, and further engage employees to support safe behaviours/program adherence, etc. The purpose of this safe work practice (SWP) is to support the identification, elimination and/or mitigation, action tracking and communication/learning from potential workplace hazards to support safe work execution at the Suncor St. Clair Ethanol facility. This safe work practice applies to all employees and contractors working at the Suncor St. Clair Ethanol facility.

Roles and Responsibilities

Site Director

- *Provide all necessary resources to support the execution and sustainment of the OBS SWP*
- *Identify OBS targets in consultation with the site discipline managers*
- *Establish minimum site participation targets annually*

Environment, Health and Safety

- *Collect and input OBS data*
- *Identify action items and review with affected discipline managers/responsible party prior to input into Enablon*
- *Track OBS data (including participation and trending) and review with discipline leaders and supervisors*
- *Maintain the St. Clair Ethanol Plant OBS Form and communicate any changes with the site*
- *Provide feedback on the program to the Joint Health and Safety Committee*
- *Distribute monthly participation reports to discipline leaders and supervisors*
- *Maintain OBS records*

Discipline Managers (Operations, Maintenance, Technical, etc.)

- *Support consistent participation of direct reports*
- *Support action item follow-up as appropriate*
- *Provide feedback to workers and the site discipline managers related to the execution of the SWP*
- *Include program participation as part of worker performance evaluations*

Shift Supervisors

- *Support consistent participation of direct reports*
- *Support action item follow-up as appropriate*

- Provide feedback to workers and the site discipline managers related to execution of the SWP
- Include program participation as part of worker evaluations

Employees

- Actively participate in the OBS program on a continuous basis (i.e. monthly)
- Record in detail any at-risk observations and any field-level corrective actions taken
- Support action item follow-up as appropriate
- Participate in initial OBS training and any refresher training as needed

Program Overview

The Observation Based Safety is a peer-to-peer method of coaching, counselling, and encouraging all employees to reinforce safe work practices.

In addition to the OBS Checklist, the program shall also include Focus Observations and SIF Verification Forms. Completion of the Focus Observations and SIF Verification Forms shall be tracked for individual participation; however, they will not be tracked as part of the site's overall OBS target number.

Focus Observations shall be developed by the site Industrial Hygiene and Safety Advisor in consultation with the Joint Health and Safety Committee.

Safety Observation Cycle

Step One: Identify processes and behaviours that are critical to obtaining the required safety performance.

SCEP defines expectations regarding safe work through the development of various programs including (but not limited to):

- Hazard specific Safe Work Practices
- Safe Operating Procedures
- Life Saving Rules
- Serious Injury and Fatality precursor and prevention
- Joint Health and Safety Terms of Reference
- Safety Campaigns/Moments
- Incident Management Program

Step Two: Communicate the defined processes and behaviours and how they are performed correctly to all workers.

Safe work expectations are communicated by the following (but not limited to):

- Employee orientation/onboarding process
- Contractor Site Safety Orientation
- Joint Health and Safety Committee meetings and minutes
- Monthly discipline safety meetings (i.e. operations, maintenance, administration)
- Email communication of Safety Moments/Campaigns/Reminders
- Incident Learnings Distribution
- Site bulletin boards/posters
- Training Matrix maintenance/execution – provides roadmap of internal and external training requirement to support safe work execution

Step Three: Observe, analyse and provide worker feedback

In order to identify active work for observation, workers may:

- Review outstanding permits in the Shift Supervisor's office
- Notify the Shift Supervisor of their location and conduct a field walk to identify ongoing work
- Contact the Operations Coordinator and/.or Maintenance Coordinator for the upcoming work schedule

Observer may initiate a safety observation by notifying the worker of their intention to conduct an observation, or by simply engaging in conversation with the worker.

Key items to consider include the review of the Safe Work Permit, Field Level Hazard Assessment (FLHA) and/or worker knowledge for consideration and control of

- SIF Precursors
- Life Saving Rules
- Hazard categories (physical, chemical, mechanical, ergonomics, etc.)

If any observer identifies an uncontrolled hazard or unsafe condition, the observer is obligated to notify the affected worker(s), apply immediate corrective actions where applicable or escalate (via notification to the Shift Supervisor and recording on the OBS Checklist) those items which cannot be immediately addressed.

The OBS Checklist may be utilized to facilitate the conversation and to support systematic review – but does not have to accompany the worker in the field. Any notes made in the field will be transferred to the OBS Checklist to support evaluation, corrective action and record keeping activities.

Note: if at any point during the observation does an incident-with loss, or an incident-no loss occur, the observation shall be terminated immediately and the proper Incident Management notification shall be conducted.

During the observation, the observer shall create a dialogue regarding any at-risk behaviour that can be modified in field or providing positive reinforcement.

All comments, suggestion and corrective actions must be recorded on the OBS Checklist. Any behaviour that cannot be modified in field must be noted so the corrective actions may be assigned through Enablon.

Step Four: Collect, record, and analyse data to proactively identify trends/issues.

The OBS Checklist shall be submitted to the dropbox in the Control Room Lunchroom where they will be collected and analysed by the EH& Department.

OBS data is sorted by year and inputted into spreadsheets on the secure drive. These spreadsheets track trends corresponding with the program metrics.

Corrective actions are assigned through Enablon based on comments/feedback from the OBS Checklist.

Monthly updates regarding program participation and safety trends are provided to the SCEP Leadership Team, Shift Supervisors, and JHSC. Monthly OBS statistics can be found in the JHSC Meeting Minutes.

Participation Requirements

It is expected that all active duty employees will participate in the Observation Based Safety program upon completion of their training. Minimum participation requirements will be determined annually by the Site Director. Discipline Managers may choose to increase participation requirements for their direct reports as they deem appropriate.

The participation of long-term contractors will be the discretion of their site contact dependant on their role within the site. Training will be provided based on the recommendation of their site contact.

Participation shall be tracked monthly and report will be provided to the Discipline Managers. Employees will receive participation for completing the minimum participation requirement each month. Participation percentage scores are calculated by the count of participants within a given month divided by the total able participants within that group. Additionally, Shift Supervisors will receive a report of their crew's participation each month.

Site participation is tracked as both a large singular group, and broken down by discipline:

- Leadership Team
- Operations
- Maintenance
- EH&S
- Administration
- Lab

Program Metrics

Average Percent Safe Rating: the OBS metric based on the average of all the percent safe ratings recorded during a given month. Gives an overall representation of how the site is performing.

Total OBS Completed: the sum of all OBS completed within a month. This does not represent the number of participants.

Monthly Total Involvement: the count of program participants within a month.

Contact Rate: the total number of OBS completed divided by the number of safety critical roles onsite.

Percent Participation: the count of all program participants within a month divided by the total number of active employees.

Training

All employees of the Suncor St. Clair Ethanol facility shall be provided with Observation Based Safety Program training prior to their participation in the program. Training will be completed within a reasonable period of time following their initial date of employment. Until training has been completed, employees are not expected to participate in the program.

All employees and long-term contractors will be assigned Managing Hazards in the Workplace upon their employment on Suncor's LMS (*course ID: 193001*).

It is the discretion of the long-term contractor's supervisor to determine whether or not the individual shall participate in the program. Training will be provided to those that are expected to participate. The long-term contractor's supervisor will notify the site Training Coordinator to schedule OBS training.

Record Keeping

OBS hard copy records will be maintained by the EH&S Department for a minimum of 1 year. OBS' that require action item follow-up will be scanned and retained in the Enablon system.

Definitions

Safety Critical Roles: the number of roles the Suncor St. Clair Ethanol facility that are deemed "safety sensitive" (i.e. Operations, Maintenance, Lab). This number is used to accurately

Review/Revision

A review of this document will occur following a regulatory change or at a minimum of every 5 years utilizing the "**EH&S SOP Review and Sign-Off Sheet**" \\file128\stclair\Operations\Employee Resource Centre\Procedures\SOP's & OGS's. The Document Control Administrator will notify the Document Contact - who will steward the review and will engage the Operation Coordinator to support the review from an operations and maintenance perspective. Other events which trigger review (MOC, Incident Findings) include processes which will initiate review.



References

Include any document used in the review/development/upgrade (i.e. CSA standards, corporate documents, related standards, etc.)

Note: Completion of EH&S SOP Review and Sign-off Sheet completed and submitted with updated document

END OF SAFE WORK PRACTICE

REVISIONS			
No.	Date (mm/dd/yyyy)	Author	Description
0	10/25/2017	L. Nauta	Created