

# Behavior-Based Safety Program

(BBS)

Guy's Construction  
123 Main Street, Anytown, CA 90210

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Effective Date: June 08, 2026

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**PROACTIVE SAFETY - LEADING INDICATOR PROGRAM**

## 1. PURPOSE AND PHILOSOPHY

Guy's Construction is committed to a proactive approach to workplace safety. This Behavior-Based Safety (BBS) Program shifts our focus from reacting to incidents after they occur to identifying and correcting at-risk behaviors before they result in injury.

### The ABC Model of Behavior

BBS is grounded in the Antecedent-Behavior-Consequence (ABC) model:

- Antecedents (Activators): Conditions that prompt a behavior - safety signs, toolbox talks, training, equipment availability, or production pressure.
- Behaviors: The actual safe or at-risk actions workers perform on the job.
- Consequences: The results that follow behaviors and reinforce or discourage future actions. Immediate positive reinforcement of safe behavior is more effective than punishment for at-risk behavior.

### Leading vs. Lagging Indicators

Traditional safety programs measure lagging indicators - incident rates, workers' compensation claims, TRIR, DART - which record events after they happen. This BBS program focuses on leading indicators:

- Number of safety observations conducted per week
- Percentage of observed behaviors that are safe
- Number of at-risk behaviors identified and corrected
- Trend data showing improvement over time

These metrics reveal hazardous patterns before injuries occur. OSHA's Recommended Practices for Safety and Health Programs (OSHA 3885) recognizes worker participation and proactive hazard identification as foundational elements of an effective safety program.

## 2. SCOPE AND APPLICABILITY

This BBS program applies to all Guy's Construction employees, subcontractors, and temporary workers performing work at any Guy's Construction-controlled worksite.

### Regulatory Basis

While no specific OSHA standard mandates a BBS program, this program supports compliance with:

- 29 CFR 1926.21(b)(2) - Employer obligation to instruct employees in hazard recognition and avoidance
- 29 CFR 1910.132(d) - PPE hazard assessment requirement
- OSHA General Duty Clause (Section 5(a)(1)) - Employer obligation to provide a workplace free from recognized hazards
- OSHA Recommended Practices for Safety and Health Programs (OSHA 3885) - Worker participation and proactive hazard identification
- T8 CCR 3203 - California IIPP requirement that the program address specific hazards employees are exposed to and involve employees in hazard identification

**ISNetworld RAVS Note: This BBS program is formatted to meet ISNetworld RAVS review requirements for the Behavior-Based Safety program category.**

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### 3. ROLES AND RESPONSIBILITIES

#### Management

- Visibly support and participate in the BBS observation process
- Review observation data at least monthly
- Provide resources to correct identified at-risk behaviors and conditions
- Recognize and reward participation and safe behavior
- Ensure the program is not used punitively

#### Supervisors

- Conduct a minimum number of observations per week per the schedule in Section 4
- Complete observation cards accurately and submit data for tracking
- Provide immediate, positive feedback for safe behaviors observed
- Address at-risk behaviors constructively - focus on the behavior, not the person
- Attend BBS program training before conducting observations

#### Employees

- Participate in observations - both as observers and as those being observed
- Accept feedback constructively; the goal is safety improvement, not discipline
- Report at-risk conditions and behaviors they cannot correct themselves
- Participate in BBS training

#### BBS Program Coordinator

The BBS Program Coordinator for Guy's Construction is: Guy Foreman

- Maintain observation data and generate trend reports
- Distribute observation cards and tracking forms
- Present findings at safety meetings
- Coordinate corrective actions for systemic at-risk behaviors
- Update the observation checklist when hazards or operations change

## 4. OBSERVATION PROCESS

Guy's Construction uses supervisor and peer observations with a target frequency of weekly minimum.

### Step-by-Step Observation Procedure

1. PREPARE: Review the observation checklist for the work area. Identify behaviors to observe.
2. OBSERVE: Watch the work activity without interrupting. Note both safe and at-risk behaviors.
3. INTERVENE (if necessary): If an immediately dangerous condition exists, stop the work and address it before proceeding.
4. RECORD: Complete the observation card - check safe or at-risk for each behavior observed.
5. FEEDBACK: After observation, provide immediate positive feedback for safe behaviors. Address at-risk behaviors conversationally, focusing on what you saw and why it matters.
6. SUBMIT: Turn in completed observation card to the BBS Coordinator within 24 hours.

### Feedback Guidelines

- Lead with what was done safely before addressing at-risk behaviors
- Be specific: 'I noticed you were tied off the entire time on the roof - that's exactly right' rather than 'good job'
- For at-risk behaviors: describe what you saw, explain the hazard, ask what would make it easier to work safely
- Never use observations for disciplinary action - this destroys the program
- Thank the worker for their time and participation

## 5. BEHAVIORAL OBSERVATION CHECKLIST

Complete one observation card per observation session. Observer: \_\_\_\_\_ Date: \_\_\_\_\_  
 Location: \_\_\_\_\_

### Fall Protection

Behavior/Activity	Safe	At-Risk	Comments / Action Taken
Employee tied off at heights above 6 ft (7.5 ft CA)			
Harness inspected before use			
Anchor point rated 5,000 lbs minimum			
Ladder extends 3 ft above landing			
Guardrails in place on open sides			

### PPE

Behavior/Activity	Safe	At-Risk	Comments / Action Taken
Hard hat worn in designated areas			
Safety glasses worn when required			
High-visibility vest worn near traffic or equipment			
Gloves appropriate for task			
Foot protection meets requirements			

### Tool & Equipment Use

Behavior/Activity	Safe	At-Risk	Comments / Action Taken
Guards in place on power tools			
Powder-actuated tools used only by certified operators			
Equipment pre-shift inspection completed			
Defective equipment tagged out and removed			

### Housekeeping

Behavior/Activity	Safe	At-Risk	Comments / Action Taken
Work area free of slip/trip hazards			
Materials stored properly			
Waste disposed of in designated areas			
Walkways and egress routes clear			

### Excavation & Trenching

Behavior/Activity	Safe	At-Risk	Comments / Action Taken
Competent person present for excavations > 5 ft			
Protective system in place (slope, shore, or box)			

Behavior/Activity	Safe	At-Risk	Comments / Action Taken
Egress within 25 ft of all workers			
811 called before digging			

**Struck-By Hazards**

Behavior/Activity	Safe	At-Risk	Comments / Action Taken
Exclusion zones established around equipment			
Spotter used when equipment has blind spots			
High-vis PPE worn near mobile equipment			
Materials stored away from leading edges			

**Overall Observation Summary**

Total behaviors observed: \_\_\_\_\_ Total safe behaviors: \_\_\_\_\_  
 Total at-risk behaviors: \_\_\_\_\_ % Safe behaviors: \_\_\_\_\_ %  
 Observer comments / Actions taken: \_\_\_\_\_  
 Worker acknowledgment (optional): \_\_\_\_\_

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## 6. DATA COLLECTION AND TREND ANALYSIS

The BBS Coordinator compiles observation data weekly. Data is reviewed at monthly safety meetings and presented to management quarterly.

### Metrics Tracked

- Observations completed per week (target: \_\_\_\_\_ observations/week)
- Percentage of safe behaviors (leading indicator - target: improve monthly)
- Most frequently observed at-risk behaviors (identifies systemic issues)
- Categories with lowest safe behavior rates (prioritizes corrective action)
- Participation rate by crew, trade, or work area

### Monthly BBS Trend Report

Month	Obs Completed	% Safe	Top At-Risk Behavior	Action Taken

### Corrective Action Process

When trend data identifies a systemic at-risk behavior:

- Document the pattern and the specific behaviors observed
- Identify root causes: training gap, equipment issue, environmental factor, or production pressure
- Develop corrective action: additional training, engineering control, procedure change, or equipment modification
- Assign responsibility and target completion date
- Verify effectiveness at the next observation cycle

## 7. TRAINING REQUIREMENTS

### Observer Training

All personnel who conduct BBS observations must complete the following training before beginning observations:

- BBS program orientation (this program, observation process, feedback techniques)
- How to complete the observation card
- Feedback skills - positive reinforcement and constructive correction
- Data entry and submission procedures

Training duration: minimum 2 hours. Document training with sign-in sheet.

### All-Employee Orientation

All employees and subcontractors working on company sites must receive a brief orientation covering:

- What BBS is and why we use it
- The observation process - what to expect when being observed
- How to provide feedback if you see an at-risk condition
- That observations are not used for discipline

Orientation duration: 20-30 minutes. Document with sign-in sheet.

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## 8. PROGRAM REVIEW AND CONTINUOUS IMPROVEMENT

The BBS program is reviewed annually by Guy Foreman and updated as needed. The program is also reviewed following:

- Any recordable injury or near-miss on a company project
- Changes in work scope, crew composition, or operating conditions
- Significant changes in observation data trends
- Feedback from employees or supervisors indicating program issues

### Annual Program Certification

This BBS program was reviewed and is current as of:

Program Coordinator: \_\_\_\_\_ Date: \_\_\_\_\_

Management Representative: \_\_\_\_\_ Date: \_\_\_\_\_

Next scheduled review date: \_\_\_\_\_

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