



# **CONDENSED SAFETY MANUAL**

51-53-55 Summer Street  
Walpole, MA

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# 1. PURPOSE & SCOPE

This manual provides an outline of the Policies and Procedures for documenting and communicating the safety responsibilities on Fairfield projects. This document is not meant to replace or supersede Fairfield's Master Project Incident Illness Prevention Plan (IIPP), the Reprimand Policy, or the Site-Specific Safety Plans.

## 2. JOBSITE SAFETY REQUIREMENTS

The **Fairfield Development** is **primarily responsible for safety** on each **project**. This requires the Fairfield Project Team to enforce the project's **Site-Specific Safety Plan!** Safety is everybody's responsibility.

### A. POSTED SAFETY REQUIREMENTS

Fairfield requires that each Jobsite have the proper Federal, State, and Local Employment and OSHA signage posted in an accessible location. The Project Team must post the **Fairfield Project Signs** (which includes the project address, and company contact information), and the **Safety Requirements and Jobsite Rules** sign at each of the primary entrance(s) to the Jobsite. Depending on the jurisdiction, the Project Team must post the **Storm Water Pollution Prevention Plan (SWPPP) sign**. It is the Project Team's responsibility to ensure that signage is properly displayed and kept free from graffiti.

Post the appropriate Fairfield information inside the Construction Office (e.g., trailer, remote trailer/office, storage container if includes office space, etc.). This includes but is not limited to:

- Directions to the nearest hospital and/or urgent care
- Fairfield Employees' Nurse's Hotline
- Fairfield Ethics Hotline
- Site Logistics Plan
- Labor Posters and required state and federal OSHA forms (i.e., Federal, State, OSHA 300, etc.)

Keep the **Site-Specific Safety Plan** readily available in the Construction Office, as well as upload it to **03. FFD Policies and Programs > 02. Safety Program** folder in Procore.

### B. EMPLOYEE SAFETY REQUIREMENTS

All Fairfield Jobsite personnel must have CPR training with no exceptions. It is required that all Project Managers and Lead Superintendents have taken the OSHA 30-hour certification. It is required that all Director of Construction, Assistant Project Managers, Assistant Superintendents, and Project Engineers have taken the OSHA 10-hour certification.

## C. JOBSITE REQUIREMENTS

### I. PERSONAL PROTECTIVE EQUIPMENT (PPE), FIRST-AID KITS, SAFETY POSTERS

All Fairfield employees and Jobsite visitors are required to wear hard hats and high visibility apparel (e.g. shirts, vests, etc.) while on-site. It is the Fairfield Project Team's responsibility to keep ample hard hats and reflective vests in the Construction Office (typically 6 sets of hard hats and reflective vests).

All subcontractors, including their employees and sub-crews, are required to wear the correct Personal Protective Equipment (PPE) for their job function and to enforce this policy. It is the Fairfield Project Team's responsibility to walk the Jobsite and ensure all subcontractors and Fairfield Project Team members are wearing hard hats and appropriate PPE, and note all the safety violations whether with a verbal warning or using the Observation tool in Procore.

In addition to the Site-Specific Safety Plan printed and electronic formats, all Fairfield Construction Offices must have fully stocked First-Aid Kits and have posted all correct safety and employment posters.

### II. DAILY SAFETY INSPECTIONS

The Project Team must walk Fairfield Jobsites daily with a focus on safety and Jobsite safety inspections must be documented in Procore. All items that are inspected require a "Pass", "Fail" or "N/A", or "Safe", "At-Risk" or "N/A" selection in Procore. Refer to Procore Best Practice (BP) Manual Section.

If a safety violation is seen, the violation should be documented in Procore in the Observation tool, reported to the Subcontractor's foreman and or supervisor, and remedied immediately. In accordance with the Reprimand Policy or as required by the Site-Specific Safety Plan, a fine is to be issued by executing a deductive Change Order. Refer to Procore BP Manual for more information. The Reprimand Policy is found in the Master IIPP and on Procore **Company Level Documents> New Construction Manuals**. Fairfield requires that a competent<sup>1</sup> Fairfield employee and Subcontractor foreman/supervisor be on-site when work is taking place.

**Note:** In Procore Inspection Tool, a **Daily Safety Inspection** template is available for your use.

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<sup>1</sup> Competent Person: One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

### **III. WEEKLY SAFETY MEETINGS**

Every Fairfield Jobsite is required to hold Weekly Safety Meetings. It is recommended that the topic of those safety meetings correspond generally to the work that is taking place on the Jobsite.

**For Example:** If trenching is in progress, it is recommended that the safety meeting include a discussion about Trenching.

Unless required otherwise by a local jurisdiction, Weekly Safety Meetings can take place during the Weekly Jobsite Meeting. The sign-in sheet, topic, and notes from the meeting must be kept in Procore.

If cranes of any type are used on the project, it is the Project Team's responsibility to conduct lift safety meetings and discuss any potential hazards that are identified. If there are multiple cranes on a project where their swing paths intersect, it is the Project Team's responsibility to conduct daily lift safety meetings to discuss and plan all upcoming lifts, identifying any potential collisions, and establish a plan to avoid any conflicts.

### **IV. SAFETY VIOLATIONS**

If there are safety violations identified by Fairfield Project Team or Third-Party Safety consultant, Fairfield employs an escalating violation structure including but not limited to verbal warnings, written warnings, fines, and dismissal from the Jobsite. Fairfield employees must file safety violations in Procore to document the event. All fines must be enforced by immediately issuing an Observation, a Change Event, and then a deductive Change Order on Procore.

If there are multiple violations by the same subcontractor, there will be escalating fines. If the subcontractor is found in gross negligence of the Project Specific Manual or OSHA guidelines, the violation will result in removal from the Jobsite.

The fine structure is as follows:

- Minor Violations – Starting at \$200
- Major Violations – Starting at \$400

Refer to the **Reprimand Policy** for a description of the fine structure.

## **3. THIRD-PARTY SAFETY REQUIREMENTS**

### **A. THIRD-PARTY SAFETY**

All Fairfield projects will have a Third-Party Safety Inspection company develop a Site-Specific Safety Program and hold Jobsite inspections. The Fairfield Project Team must determine the frequency of the Jobsite inspections **(monthly)**

**inspection is the minimum**). The frequency of the Third-Party Safety inspections should increase to bi-weekly or weekly based on the type of work being performed, safety violations, or if an incident occurred. This frequency increase is determined by the Project Team through discussion with the Director of Construction.

The Third-Party Safety Inspection company will also document incidents & accidents, issue safety violations, and will be on-site during an OSHA inspection.

## **I. SITE-SPECIFIC SAFETY PLAN**

All Fairfield projects must have a Site-Specific Safety Plan developed by the Third-Party Safety company. Store the Site-Specific Safety Plan in the Jobsite Construction Office, as well as on Procore to the **03. FFD Policies and Programs > 02. Safety Program** folder. All trades must have a Site-Specific Safety Plan in place and that plan must be stored in the Fairfield Construction Office as well as uploaded to Procore in the folder mentioned above.

All incidents, accidents, and near misses must be reported using the Incident module in Procore.

## **II. SITE-SPECIFIC SAFETY ORIENTATION**

All Fairfield projects must have Site Safety Orientations for employees and subcontractors. Once an employee or subcontractor has participated in and completed the orientation, they will receive a sticker to put on their hardhat.

A log will be kept of all Fairfield employees and subcontractors who completed the safety orientation program. The log will track their Name, Company, Date, and Time they completed the safety orientation and hardhat sticker number.

Each Fairfield project will have a Site-Specific safety video produced by SFI Compliance. If you would like to use other Third-Party Safety Consultants to produce the video, please contact [ConstructionOps@ffres.com](mailto:ConstructionOps@ffres.com). This video shall contain pertinent information including:

- Project contact information
- The route to the nearest hospital
- State-specific OSHA information (if applicable)
- General safety guidelines

## **III. SAFETY INSPECTIONS**

The Fairfield Project Team and Third-Party Inspector will determine the frequency of visits to the Fairfield Jobsite. Before commencement, the Project Team will hold a Preconstruction Meeting with the Third-Party Safety Consultant and all contracted subcontractors. All Fairfield Jobsites are

required to have inspections performed by the Third-Party Inspection company. It is recommended that each project:

- Start with one safety inspection per month
- Increase the inspections to two per month based on the type and volume of work, while also taking into account the number of violations reported
- When appropriate, reduce the number of inspections to one per month once safety risk has been reduced to an acceptable level.

#### **IV. SUBCONTRACTOR SITE-SPECIFIC SAFETY PROGRAM**

Every project will require Subcontractors to furnish a Site-Specific Safety Plan as a part of their Submittal package. This plan will be kept available at the Jobsite and uploaded and processed in Procore either as a submittal, or uploaded to the **03. FFD Policies and Programs > 02. Safety Program** folder.

Consult your Third-Party Inspection company regarding the Subcontractor Site-Specific Safety Program if you have questions.

## **4. INCIDENTS, ACCIDENTS, AND NEAR MISSES**

### **A. DEFINITION OF TERMS**

**Near Miss**: An event that does not result in a personal injury or property damage, but was given a slight shift in time or position, damage and/or injury easily could have occurred.

**Incident**: An unplanned event that does not result in personal injury but may result in property damage or is worthy of recording.

**Accident**: An unplanned event that results in personal injury or property damage. An accident may indicate there is a deficiency in the Subcontractor's Site Specific Safety Program.

### **B. ACTION PLAN FOR NEAR MISS'S, INCIDENTS, AND ACCIDENTS**

**Near Miss**: All near misses must be reported through Procore to the Fairfield Project team, Fairfield Regional Management, and the Third-Party Safety Company. After a Near Miss, the Site-Specific Safety Program for that specific trade should be reviewed with the subcontractor(s) and citations issued as required by policy.

**Incident**: All Incidents must be reported through Procore to the Fairfield Project Team, Fairfield Regional Management, Third-Party Safety Company, Fairfield Risk Management Department, and if necessary, Federal and State OSHA. If the incident results in property damage, Risk Management must be notified through Procore. In addition to pictures, witness statements, copies of driver licenses, and

a Fairfield Incident Report must be completed to document the incident. A Third-Party Consultant Incident Report and video may be required as well. After an Incident, the Site-Specific Safety Plan for the project must be reviewed with the trade(s). The Site-Specific Safety Plan must be reviewed by the Third-Party Site Safety company to identify any deficiencies, and then updated as needed. If required, citations will be issued once the reviews have been conducted, citations will be issued.

**Accident (Incident OSHA):** All Accidents must be reported through Procore within the required time frame specified by OSHA to the Fairfield Project Team, Fairfield Regional Management, Fairfield Risk Management, Third-Party Safety company, and if required, Federal and State OSHA.

If emergency personnel need to be contacted, all records of the treatment received by the injured party must be uploaded to the Incident Module on Procore.

Every accident must receive a thorough investigation. For guidance on accident investigations visit the OSHA website ([OSHA - Accident Investigation](#)). The purpose of the investigation is to identify and document the cause of the accident. Accident documentation must include photos and videos. After an accident occurs, Fairfield's and the Subcontractors' Site-Specific Safety Program must be reviewed with the responsible parties. Once the cause is identified, the Site-Specific Safety Program(s) must be reviewed by the Third-Party Site Safety company to identify any deficiencies and updated if needed. Once the investigation has been conducted, citations may be issued and corrective actions must be taken.

A work-related accident that results in hospitalization, death, or property damage must be reported by the Fairfield Field Staff to Fairfield Project and Regional Management Teams.

Additionally, the following will also require notification of the accident:

- Fairfield Senior Vice President or Fairfield Executive Vice President
- Fairfield Risk Management department within 6 hours of the accident.
- The local OSHA office (see guidelines below).

**Click [here](#) for OSHA Incidents Reporting requirements.**

All employers are required to notify OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye.

A Fatality must be reported to OSHA within 8 hours.

An in-patient hospitalization, amputation, or eye loss must be reported to OSHA within 24 hours.



## **5.REPORTING TO RISK MANAGEMENT**

Notify the Risk Management Department of property damage that may exceed the insurance deductible or work-related accident resulting in hospitalization. The Project Manager, Assistant Project Manager, or the Director of Construction shall use the Procore Incident Tool to notify Risk Management Department.

## **6.OSHA**

### **A.FEDERAL STANDARDS**

All Fairfield projects must meet the Federal OSHA Standards. It is the Fairfield Project Team's responsibility to understand and implement Federal OSHA standards on their project.

All Fairfield Project Managers and Lead Superintendents are required to complete 30-hour certifications.

All Fairfield Director of Construction, Assistant Project Managers, Assistant Superintendents, and Project Engineers are required to complete a 10-hour OSHA certification class.

All Fairfield field personnel (i.e. Superintendents, Assistant Superintendents, Project Engineers, Assistant Project Managers, etc.) are required to have current CPR certification. CPR certifications expire every 2 years.

### **B.STATE STANDARDS**

All Fairfield Project Teams must also be familiar with the State OSHA requirements for projects being built in the following states:

- Arizona
- California
- Maryland
- Oregon
- Virginia
- Wahington

### **C.OSHA INSPECTION PROCEDURES**

#### **I. ARRIVAL OF THE COMPLIANCE OFFICER**

- Verify the Compliance Officer's credentials—look at ID and business card.
- Determine why the Compliance Officer wants to inspect the project, i.e. complaint, accident, programmed, imminent danger, follow-up.
  - If a complaint inspection, ask to have a copy of the complaint.
  - If a programmed inspection, ask for a focused inspection.

- Tell OSHA that your company policy is to contact your Management and Third-Party Safety Consultant before starting the inspection. Have OSHA wait in the construction office while you are making phone calls.

Brief your Third-Party Safety Consultant on the situation, and then ask OSHA if they will speak to your Third-Party Safety Consultant.

- The following is to be done if the Third-Party Safety Consultant cannot be at the job when the OSHA inspector conducts the inspection.
  - Request an opening conference if the Compliance Officer does not call for one.
  - Have the project superintendent and/or the project manager present.
  - Take detailed notes of everything discussed.
  - Keep all publications and documents given to you by the Compliance Officer and note who gave it to you and the date of its receipt.
  - If more than one Compliance Officer is involved, find out if they plan to make the inspection in one group or split into two or more groups to make the inspection. If they want to divide into two or more groups, tell the Compliance Officer you will have an employer representative with each group.
  - Be cooperative with the Compliance Officer. At all times before, during, and after the inspection act in a professional businesslike manner. Never enter personal arguments with the Compliance Officer.
  - Tell the Compliance Officer that you expect him/her to advise the company of all suspected violations and the standard involved. Tell the Compliance Officer that you will be taking notes of all the suspected violations he/she informs you of so that there will be no dispute as to whether the company was informed.

## **II. RECORDS REVIEW**

- Allow the Compliance Officer to look only at your Site-Specific Safety Program.
- Do not volunteer to give or let the Compliance Officer look at any safety inspection reports made by the Third-Party Safety Consultant, insurance carrier, etc. other than those reports required by OSHA (such as scaffolding inspection forms). This includes not giving or letting the Compliance Officer look at any such reports that have been made on the subcontractor's activities.

### **III. WALK-AROUND INSPECTION**

#### **General Instructions**

- Have the company representative accompany the Compliance Officer at all times. Never leave the Compliance Officer to have free and unlimited access to your work without the company representative.
- Control the inspection. Treat the Compliance Officer as you would a guest in your house; they are there with permission and will be expected to follow all instructions given to them and will be required to inspect in such a manner that it does not disrupt the scheduled work. Remember, it is the company's construction project, not OSHA's. The Compliance Officer is to be treated like any other visitor—under your control while on our project. Tell them that you need to take your notes, pictures, and gather information at the same time.
- Refer all questions the Compliance Officer asks to the Subcontractor's Representative when possible.
- Take detailed notes of everything seen, discussed, and done by the Compliance Officer.
- Take photographs of everything the Compliance Officer photographs. If the equipment, work area, etc., can be photographed from a more favorable position (different angle, greater distance, etc.) photograph it from a different position.
- Do not allow any employee to perform demonstrations for the Compliance Officer. For example—if a truck is idle and the Compliance Officer asks you or an employee to operate it, so he can see if the horn or backup alarm is working, refuse to do it. Allow the Compliance Officer to see the work as it is normally being done only.
- Do not volunteer any information. Refer all questions the Compliance Officer asks to the Subcontractor's Representative when possible. The Compliance Officer is trained to obtain admissions from companies. Be careful when answering questions. When in doubt, ask them to restate the question. Do not admit to a violation. State the facts only, not your opinion. Do not lie to the Compliance Officer at any time.
- Do not issue orders, such as "clean up the trash", during the inspection to have conditions corrected that have not been noticed by the Compliance Officer. The immediate abatement of an alleged violation will not preclude being cited by the Compliance Officer and may alert them to the condition.
- Make sure you fully understand everything the Compliance Officer does or comments on. If you do not understand everything they say and do, ask questions. Insist on having time to record all facts, even if the inspection is slowed down.

### **Rules for Being Interviewed**

1. Tell the truth.
2. Make sure you understand the question.
3. Just answer the question, nothing else.
4. Answer based on your knowledge only... don't guess or speculate.

### **Employee Interviews**

- The Compliance Officer may interview any employee privately.
- For interviews held with employees in our presence, record the names and companies of all employees interviewed. Record the content of the conversations with the employees.
- We have the right to be in attendance with management personnel.

## **IV. CLOSING CONFERENCE**

- Contact your Third-Party Safety Consultant before the closing conference. Have the designated company representative present for the closing conference.
- Take notes of everything discussed and record what documents were distributed by the Compliance Officer.
- Make sure that no questions you have concerning the inspection go unanswered. If the Compliance Officer feels that violations exist on the project, find out exactly why they feel that way. Tell them that you are noting every potential violation that they advise may exist so there will be no dispute at a later conference or hearing. Hand the list back and ask if that is everything, ask what other items may exist. If they are unsure or do not list any others, tell them that you are noting that no additional items were included in response to your questions.
- Don't give any estimates of abatement time needed to correct any alleged violations.

## **V. AFTER THE CLOSING CONFERENCE**

Prepare a detailed report of your inspection notes. Include photos and any other relevant information. Send a report to the Third Party Safety consultant. A report is found in the Fairfield Master IIPP.

Keep all notes and pictures taken on the file

## **7.SAFETY REQUIREMENTS FOR SUBCONTRACTORS AND VENDORS**

All subcontractors and vendors entering a Fairfield Jobsite must be compliant with all OSHA standards. If a subcontractor or vendor does not comply with OSHA requirements, they will receive a citation from Fairfield (refer to Fairfield Safety Program 'Reprimand Policy'), and the penalties for any safety violations are referenced in the Reprimand Policy and Site-Specific Safety plan.

All subcontractors are required to attend the weekly Jobsite safety meetings, and their attendance will be recorded. If a subcontractor fails to attend a required weekly safety meeting, they will be fined, as required per their agreement.

## 8. BUILDERS RISK PROGRAM

Contact Risk Management to get a copy of the Builders Risk program. It is the Project Manager's and Jobsite staff's responsibility to review the Project's Builders Risk Program and ensure all insurance requirements are fulfilled, and risks are mitigated.

## 9. SITE-SPECIFIC SAFETY ORIENTATION VIDEO

All projects must have a Site-Specific Safety Orientation Video (SSSO) produced to train employees, subcontractors, and vendors who will be working on-site.

### Using the videos

Any new employee, subcontractor or sub-subcontractor personnel, or vendor performing work on-site must view the SSSO Video before commencing work on-site.

Once they have viewed the SSSO Video, they must enter their name on the tracking log and be assigned a numbered sticker to place on their hard hat. Be sure to record that number next to the assignee's name on the log. This log will be stored in Procore for Fairfield's records.

### Ordering the SSSO Video:

No less than two weeks before commencing work on-site, the Project Team must contact [melissa@sficompliance.com](mailto:melissa@sficompliance.com) to request the video and stickers. The request must include the following:

- A complete SSSO Order Form. The form is located on Procore in the **Company Documents > Forms and Templates** folder.
- Company Name: use the Fairfield Development L.P. or the appropriate dba.
- Site name: use the Project Name as it appears on the commitments.
- Emergency Room: identify the nearest emergency room and attach directions.
- Site-Specific Safety Plan
- Site Logistic Plan: marked-up site plan identifying construction office, gate(s), fenced, emergency meeting location, lay down, etc.
- Identify any project-specific safety concerns (i.e. contaminated soil, asbestos, lead, building conditions, proximity to power lines, cell towers, etc.). **Note:** If the Project Team feels that a call is necessary to convey the special conditions, contact Dan Johnson ([dan@sficompliance.com](mailto:dan@sficompliance.com)) at SFI Compliance.

Click [here](#) for sample videos.