



GENERAL CONTRACTOR SAFETY MANUAL

The Construction Collaborative

Corporate Program + Field Implementation

For use with Sample Project Only – Snowdon Towers

PA Version

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1. Safety Policy Statement

Purpose

Establish the company's commitment to safety as a core value and define expectations for all personnel.

Scope

Applies to all employees, subcontractors, vendors, and visitors on projects managed by The Construction Collaborative in Pennsylvania.

Policy

Safety is a condition of employment and a condition of performing work on our projects. No task shall proceed unless hazards are identified and controlled. Safety will not be sacrificed for schedule, cost, or production.

Minimum Requirements / Procedures

1. Integrate safety planning into preconstruction, scheduling, and daily operations.
2. Require daily hazard identification and pre-task planning for all crews.
3. Empower Stop Work Authority for all personnel without retaliation.
4. Investigate incidents and near misses and implement corrective actions.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- Leadership provides resources and enforces accountability.
- Project teams implement and enforce safety requirements.

Subcontractors – Minimum Requirements

- Provide competent supervision, training, PPE, and safe work practices.
- Comply with this manual and OSHA standards.

Prohibited Practices

- Working without required controls or PPE
- Retaliation for reporting hazards or stopping work

Required Documentation

- Company safety manual acknowledgement
- Training records (employer maintained)

Inspection / Verification

- Daily verification by superintendent/SSR
- Weekly documented audits

Enforcement

- Stop work for uncontrolled hazards
- Removal from site for willful or repeated violations

OSHA / Reference Standards:

- 29 CFR 1926.20
- 29 CFR 1926.21

2. Program Administration and Accountability

Purpose

Define how the safety program is administered, measured, and continuously improved.

Scope

Applies to all company-managed projects and corporate oversight activities.

Policy

The Construction Collaborative will maintain a structured safety program with defined responsibilities, measurable expectations, and documented verification.

Minimum Requirements / Procedures

5. Assign project safety leadership roles (Superintendent, SSR, competent persons).
6. Maintain safety KPIs (inspections completed, corrective actions closed, incident rates).
7. Conduct periodic corporate reviews of project safety performance.
8. Implement corrective action plans following serious incidents or trends.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- Corporate leadership reviews performance and allocates resources.
- Project leadership executes field implementation and reporting.

Subcontractors – Minimum Requirements

- Participate in safety meetings and cooperate with audits.
- Correct hazards in their scope promptly.

Prohibited Practices

- Falsifying safety records
- Ignoring corrective actions or deadlines

Required Documentation

- Inspection reports
- Corrective action logs
- Meeting minutes

Inspection / Verification

- Weekly audit verification
- Monthly management review (recommended)

Enforcement

- Escalation for missed corrective actions
- Contract remedies for repeated noncompliance

OSHA / Reference Standards:

- 29 CFR 1926.20(b)

3. Stop Work Authority (SWA)

Purpose

Prevent incidents by empowering all workers to stop unsafe work immediately.

Scope

Applies to all personnel on site.

Policy

Any worker may stop work when unsafe conditions exist. Work may not resume until hazards are corrected and the activity is re-planned as needed.

Minimum Requirements / Procedures

9. Stop the task safely and warn others in the affected area.
10. Secure the area using barricades, signage, or removal of personnel.
11. Notify supervision and the GC superintendent/SSR immediately.
12. Correct the hazard and document corrective actions when required.
13. Resume work only after supervision confirms controls are in place.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- Respond immediately and verify hazard correction.
- Document SWA events when appropriate and share lessons learned.

Subcontractors – Minimum Requirements

- Support SWA use without retaliation.
- Correct hazards within subcontractor scope promptly.

Prohibited Practices

- Retaliation against SWA use
- Restarting work without approval

Required Documentation

- Near miss / hazard report (when applicable)
- Corrective action log entry

Inspection / Verification

- SSR verifies corrective actions are effective.

Enforcement

- Immediate stop work and escalation for noncompliance
- Removal from site for retaliation or willful violations

OSHA / Reference Standards:

- 29 CFR 1926.20(b)

4. Subcontractor Safety Management

Purpose

Qualify, onboard, coordinate, and enforce subcontractor safety performance.

Scope

Applies to all subcontractors and lower-tier subcontractors on TCC projects.

Policy

Subcontractors must maintain an effective safety program, provide competent supervision, and comply with OSHA and TCC requirements.

Minimum Requirements / Procedures

14. Complete site orientation prior to starting work.
15. Submit required plans for high-hazard work (excavation, cranes, PFAS, confined space, hot work).
16. Conduct daily pre-task planning and weekly toolbox talks.
17. Maintain housekeeping and protect other trades from hazards created.
18. Report incidents immediately and participate in investigations.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- PM ensures requirements are contractually included.
- Superintendent/SSR verify compliance daily.

Subcontractors – Minimum Requirements

- Provide competent persons and enforce safe work practices.
- Ensure lower-tier subcontractors comply.

Prohibited Practices

- High-hazard work without permits/plans
- Untrained equipment operation

Required Documentation

- Daily JHA / Pre-Task Plan
- Training records (upon request)
- SDS submittals

Inspection / Verification

- Daily coordination and compliance checks
- Weekly performance review as needed

Enforcement

- Stop work orders
- Removal from site for serious violations

OSHA / Reference Standards:

- 29 CFR 1926.16
- OSHA Multi-Employer Citation Policy (reference)

5. Orientation, Access Control, and Site Rules

Purpose

Control site access, ensure workers understand hazards and rules, and maintain accountability.

Scope

Applies to all workers and visitors.

Policy

No person may perform work on site until orientation is completed and access requirements are met.

Minimum Requirements / Procedures

19. Complete site orientation and receive authorization (badge/sticker).
20. Sign in daily as required by project rules.
21. Follow established work hours and after-hours authorization process.
22. Maintain professionalism and follow conduct rules.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- SSR maintains orientation records and access control.
- Superintendent enforces site rules.

Subcontractors – Minimum Requirements

- Ensure all employees complete orientation before work.
- Provide supervisor contact and daily headcount when required.

Prohibited Practices

- Working without orientation
- Unauthorized after-hours work

Required Documentation

- Orientation roster
- Visitor sign-in logs

Inspection / Verification

- Daily sign-in verification
- Random compliance checks

Enforcement

- Removal from site for repeated access violations

OSHA / Reference Standards:

- 29 CFR 1926.21

6. Safety Meetings, Communication, and JHA / Pre-Task Planning

Purpose

Ensure hazards are identified and controlled before work begins and communicated consistently.

Scope

Applies to all tasks performed on site.

Policy

All work must be planned using a JHA/pre-task plan and communicated to the crew before starting.

Minimum Requirements / Procedures

23. Complete daily JHA for each task and brief the crew.
24. Update JHA when conditions change or hazards evolve.
25. Conduct weekly toolbox talks and document attendance.
26. Attend weekly GC safety coordination meetings (trade leadership).

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC verifies JHAs are completed and match work in progress.
- Coordinate overlapping work to prevent trade interference.

Subcontractors – Minimum Requirements

- Conduct daily briefings and ensure worker understanding.
- Maintain records of talks and JHAs.

Prohibited Practices

- Starting high-hazard work without planning
- Copying JHAs without task review

Required Documentation

- Daily JHA forms
- Toolbox talk sign-in sheets
- Meeting minutes (GC)

Inspection / Verification

- Field verification of JHA implementation
- Audit of documentation weekly

Enforcement

- Stop work for lack of planning

- Corrective training requirements

OSHA / Reference Standards:

- 29 CFR 1926.20(b)
- 29 CFR 1926.21

7. PPE Program

Purpose

Prevent injury through minimum PPE and task-specific protective equipment requirements.

Scope

Applies to all personnel in active work areas and as required by task hazards.

Policy

PPE must be worn as required at all times. PPE does not replace engineering controls but is required as a minimum protective measure.

Minimum Requirements / Procedures

27. Minimum PPE includes hard hat, safety glasses, proper footwear, and hi-vis where required.
28. Task-specific PPE must be selected based on hazard assessment and SDS requirements.
29. Inspect PPE before use and remove damaged PPE from service.
30. Train workers on PPE use, limitations, and care.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- Enforce minimum PPE compliance and post PPE requirements.
- Audit PPE compliance during inspections.

Subcontractors – Minimum Requirements

- Provide required PPE and enforce use.
- Train workers and maintain PPE in serviceable condition.

Prohibited Practices

- Working without eye protection in active areas
- Using damaged or modified PPE

Required Documentation

- PPE hazard assessment (employer)
- PPE training records (employer)

Inspection / Verification

- Daily observation and correction
- Weekly trending for repeat issues

Enforcement

- Progressive discipline
- Removal from site for willful refusal

OSHA / Reference Standards:

- 29 CFR 1926 Subpart E

8. Housekeeping and Material Storage

Purpose

Prevent slips, trips, falls, and struck-by hazards through clean work areas and controlled storage.

Scope

All work areas and laydown zones.

Policy

Work areas must be kept clean and organized. Materials must be stored securely in designated areas.

Minimum Requirements / Procedures

31. Remove debris daily and keep access routes clear.
32. Manage cords/hoses to prevent trip hazards.
33. Stack materials to prevent collapse and secure against shifting.
34. Do not block exits, stairs, or emergency equipment.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC enforces housekeeping expectations and coordinates dumpsters/cleanup.
- SSR audits housekeeping during inspections.

Subcontractors – Minimum Requirements

- Maintain housekeeping within your work area and remove debris daily.
- Store materials only in designated locations.

Prohibited Practices

- Storing materials in stairwells or egress routes
- Leaving debris that creates trip hazards

Required Documentation

- Housekeeping inspection notes
- Corrective action log entries (if needed)

Inspection / Verification

- Daily checks by supervision
- Weekly documented audits

Enforcement

- Backcharge for repeated cleanup when allowed
- Stop work for hazardous conditions

OSHA / Reference Standards:

- 29 CFR 1926.25

9. Fall Protection Program

Purpose

Prevent falls from height through planning, engineered controls, and enforced use of fall protection systems.

Scope

All work with fall exposure and all floor openings/edges.

Policy

Fall protection is required when workers are exposed to falls of 6 feet (1.8 m) or more, and whenever required by OSHA or project rules.

Minimum Requirements / Procedures

35. Plan fall protection prior to work and include in JHA.
36. Install guardrails or covers immediately when openings are created.
37. Use PFAS when guardrails are not feasible; anchors must be rated and approved.
38. Inspect harnesses/lanyards/SRLs before use.
39. Replace any removed guardrails/covers immediately.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC maintains designated guardrails/opening protection and approves anchors when required.
- Superintendent enforces 100% compliance.

Subcontractors – Minimum Requirements

- Provide PFAS and ensure workers are trained and tied off when required.
- Replace fall protection removed for work operations.

Prohibited Practices

- Working unprotected near edges/openings
- Tying off to non-rated anchors
- Removing covers/guardrails and leaving area unprotected

Required Documentation

- Fall protection training records
- Daily JHA addressing fall hazards
- Anchor approval records (if required)

Inspection / Verification

- Daily verification of edges/openings and PFAS use
- Immediate correction of deficiencies

Enforcement

- Immediate stop work
- Removal from site for serious violations

OSHA / Reference Standards:

- 29 CFR 1926 Subpart M
- 29 CFR 1926.501
- 29 CFR 1926.502
- 29 CFR 1926.503

10. Scaffolds

Purpose

Prevent falls and collapses from improper scaffold erection and use.

Scope

All scaffold systems on site.

Policy

Scaffolds must be erected and used under competent person oversight and inspected daily.

Minimum Requirements / Procedures

40. Erect/modify/dismantle scaffolds under competent person supervision.
41. Inspect scaffolds daily and after events affecting stability.
42. Maintain guardrails, access, planking, and load limits.
43. Do not alter scaffolds without authorization.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC verifies subcontractor scaffold compliance and coordinates access impacts.
- SSR audits scaffold inspections.

Subcontractors – Minimum Requirements

- Provide competent person and inspection logs.
- Ensure users are trained and do not modify scaffolds.

Prohibited Practices

- Using incomplete scaffolds
- Removing guardrails
- Overloading platforms

Required Documentation

- Scaffold inspection logs
- Training records (employer)

Inspection / Verification

- Daily competent person inspection
- GC verification during audits

Enforcement

- Stop work and tag out unsafe scaffold
- Removal for willful violations

OSHA / Reference Standards:

- 29 CFR 1926 Subpart L
- 29 CFR 1926.451
- 29 CFR 1926.454

11. Ladders and Stairways

Purpose

Prevent falls from improper ladder use and ensure safe access/egress.

Scope

All ladders and stair systems.

Policy

Ladders must be inspected and used properly; stairways must remain clear for egress.

Minimum Requirements / Procedures

- 44. Inspect ladders before use and remove defective ladders.
- 45. Maintain 3-point contact and proper setup.
- 46. Keep stairways clear and install temporary treads/handrails as required.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC maintains clear egress and enforces access rules.
- Superintendent coordinates temporary stair protection.

Subcontractors – Minimum Requirements

- Provide compliant ladders and enforce safe use.
- Do not store materials in stairwells.

Prohibited Practices

- Using damaged ladders
- Standing on top step
- Blocking stairways

Required Documentation

- Ladder inspection records (as applicable)

Inspection / Verification

- Daily field checks

Enforcement

- Stop work for unsafe access

OSHA / Reference Standards:

- 29 CFR 1926 Subpart X

12. Aerial Lifts and MEWPs

Purpose

Prevent falls and tip-overs during elevated work platform operations.

Scope

All MEWP operations.

Policy

MEWPs must be operated by trained personnel and used per manufacturer instructions.

Minimum Requirements / Procedures

- 47. Verify operator training and authorization.
- 48. Inspect lift before use and document defects.
- 49. Use fall protection when required by manufacturer.
- 50. Maintain safe distances from power lines.
- 51. Use spotters where visibility is limited.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC coordinates lift zones and overhead hazards.
- SSR verifies training and inspection compliance.

Subcontractors – Minimum Requirements

- Provide trained operators and inspection documentation.
- Follow manufacturer requirements and maintain exclusion zones.

Prohibited Practices

- Riding rails or climbing out of baskets
- Operating without training

Required Documentation

- MEWP inspection forms
- Operator training records

Inspection / Verification

- Daily pre-use inspections
- Field observation of safe operation

Enforcement

- Stop work for unsafe operation
- Removal from site for repeated violations

OSHA / Reference Standards:

- 29 CFR 1926.453
- Manufacturer requirements

13. Excavation and Trenching

Purpose

Prevent cave-ins and excavation injuries through protective systems and competent person oversight.

Scope

All excavations and trenches.

Policy

Excavations must be protected per OSHA. A competent person must inspect daily.

Minimum Requirements / Procedures

- 52. Call 811 and verify utilities.
- 53. Install protective systems as required (shoring/shielding/sloping).
- 54. Provide safe access/egress.
- 55. Keep spoil piles back from edge and control water accumulation.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC reviews shoring submittals when required and enforces exclusion zones.
- SSR audits competent person logs.

Subcontractors – Minimum Requirements

- Provide competent person inspections and protective systems.
- Do not allow entry into unprotected excavations.

Prohibited Practices

- Entering unprotected excavations
- Working near edges without controls

Required Documentation

- Excavation inspection logs
- Shoring drawings/plan (if required)

Inspection / Verification

- Daily competent person inspections
- GC verification of barricades and access

Enforcement

- Stop work and removal for willful violations

OSHA / Reference Standards:

- 29 CFR 1926 Subpart P
- 29 CFR 1926.651
- 29 CFR 1926.652

14. Concrete and Masonry

Purpose

Prevent struck-by, collapse, and impalement hazards during concrete operations.

Scope

Concrete placement, formwork, rebar, masonry.

Policy

Concrete operations must follow engineered formwork plans and impalement protection rules.

Minimum Requirements / Procedures

- 56. Ensure formwork is designed/inspected before loading.
- 57. Protect exposed rebar with caps or covers where impalement hazards exist.
- 58. Control access to pour zones and establish communication.
- 59. Maintain safe access on decks and edges.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC coordinates pour schedules and exclusion zones.
- SSR verifies rebar protection and fall protection integration.

Subcontractors – Minimum Requirements

- Provide competent supervision and follow formwork engineering requirements.
- Maintain rebar protection and housekeeping.

Prohibited Practices

- Walking under suspended buckets
- Removing rebar caps where hazard remains

Required Documentation

- Pour plans (as required)
- Inspection records (as required)

Inspection / Verification

- Pre-pour inspection
- Ongoing monitoring during pour

Enforcement

- Stop work for uncontrolled hazards

OSHA / Reference Standards:

- 29 CFR 1926 Subpart Q
- 29 CFR 1926.701

15. Steel Erection

Purpose

Control fall, struck-by, and hoisting hazards during steel erection.

Scope

Steel erection activities.

Policy

Steel erection must be performed by qualified crews with fall protection and controlled decking/hoisting practices.

Minimum Requirements / Procedures

- 60. Establish controlled access zones where applicable.
- 61. Maintain perimeter protection and PFAS tie-off.
- 62. Coordinate hoisting and keep personnel clear of suspended loads.
- 63. Install temporary cable barriers and maintain them.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC coordinates access, perimeter protection, and opening controls.
- SSR audits steel erection compliance.

Subcontractors – Minimum Requirements

- Provide fall protection, connectors' controls, and competent supervision.
- Maintain cable barriers and repair damage immediately.

Prohibited Practices

- Working outside controlled zones without protection
- Walking under suspended loads

Required Documentation

- Steel erection plan (as required)
- Daily JHA

Inspection / Verification

- Daily field checks of edges and tie-off

Enforcement

- Stop work for fall violations

OSHA / Reference Standards:

- 29 CFR 1926 Subpart R

16. Cranes and Rigging

Purpose

Prevent catastrophic incidents through planning, qualified personnel, and exclusion zones.

Scope

All crane/derrick operations.

Policy

Cranes must comply with OSHA Subpart CC and be operated by qualified personnel.

Minimum Requirements / Procedures

- 64. Develop lift plans for critical lifts.
- 65. Inspect rigging and equipment before use.
- 66. Establish exclusion zones and barricade swing radius.
- 67. Maintain power line clearance and communication.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC reviews lift plans when required and coordinates site logistics.
- SSR audits lift meetings and exclusion zones.

Subcontractors – Minimum Requirements

- Provide qualified operators/riggers and required documentation.
- Follow lift plan and maintain exclusion zones.

Prohibited Practices

- Personnel under suspended loads
- Unapproved lifts in congested areas

Required Documentation

- Lift plans (as required)
- Operator qualifications
- Rigging inspection records

Inspection / Verification

- Pre-lift meetings
- Field monitoring during lifts

Enforcement

- Stop work and removal for violations

OSHA / Reference Standards:

- 29 CFR 1926 Subpart CC

17. Electrical Safety and Temporary Power

Purpose

Prevent shock, arc flash, and electrocution hazards.

Scope

All electrical and temporary power.

Policy

Electrical work must be performed by qualified persons and temporary power must be protected.

Minimum Requirements / Procedures

- 68. Use GFCI protection as required.
- 69. Inspect cords and remove damaged equipment.
- 70. Maintain clearance from overhead lines.
- 71. Use LOTO before servicing equipment.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC coordinates temporary power distribution and enforces cord management.
- SSR audits GFCI and cord conditions.

Subcontractors – Minimum Requirements

- Qualified electricians perform electrical work.
- Maintain tools and cords in safe condition.

Prohibited Practices

- Bypassing GFCI
- Using damaged cords

Required Documentation

- Temporary power inspection logs (as applicable)
- LOTO documentation (employer)

Inspection / Verification

- Daily checks and weekly audits

Enforcement

- Stop work for electrical hazards

OSHA / Reference Standards:

- 29 CFR 1926 Subpart K

18. Lockout/Tagout (LOTO)

Purpose

Prevent unexpected energization during servicing and maintenance.

Scope

Equipment servicing and energy isolation.

Policy

Energy sources must be isolated and verified before servicing equipment.

Minimum Requirements / Procedures

72. Identify all energy sources.

73. Apply locks/tags and verify zero energy state.

74. Control stored energy and re-energization procedures.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC verifies LOTO expectations during high-hazard activities.
- SSR audits compliance where applicable.

Subcontractors – Minimum Requirements

- Employers implement written LOTO program where required.
- Train authorized employees.

Prohibited Practices

- Servicing equipment without isolation

Required Documentation

- LOTO procedure (employer)

Inspection / Verification

- Field verification when applicable

Enforcement

- Stop work for violations

OSHA / Reference Standards:

- 29 CFR 1910.147 (reference)

19. Hot Work

Purpose

Prevent fires and explosions during welding/cutting/grinding.

Scope

All hot work tasks.

Policy

Hot work requires a permit and controls.

Minimum Requirements / Procedures

- 75. Obtain hot work permit.
- 76. Remove/protect combustibles within 35 feet.
- 77. Provide extinguishers and fire watch as required.
- 78. Inspect area after completion.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC issues permits and verifies controls.
- Coordinate with other trades and building impacts.

Subcontractors – Minimum Requirements

- Follow permit requirements and provide fire watch if required.

Prohibited Practices

- Hot work without permit

Required Documentation

- Hot Work Permit
- Fire watch log (if required)

Inspection / Verification

- Pre/post inspections

Enforcement

- Stop work and removal for permit violations

OSHA / Reference Standards:

- 29 CFR 1926 Subpart J
- 29 CFR 1926.352

20. Confined Space

Purpose

Control Permit Required Confined Space (PRCS) hazards and ensure rescue planning.

Scope

All PRCS.

Policy

Entry prohibited without permit and controls.

Minimum Requirements / Procedures

79. Identify PRCS and secure.
80. Test atmosphere and ventilate.
81. Assign roles and rescue plan.
82. Post permit at entry.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC controls permit issuance and coordination.
- SSR reviews permits.

Subcontractors – Minimum Requirements

- Provide trained personnel and comply with permit conditions.

Prohibited Practices

- Entry without permit

Required Documentation

- Confined Space Entry Permit
- Monitoring logs

Inspection / Verification

- Permit verification

Enforcement

- Stop work and removal

OSHA / Reference Standards:

- 29 CFR 1926 Subpart AA

21. Hazard Communication / SDS

Purpose

Ensure chemical hazards are identified and controlled.

Scope

All hazardous chemicals on site.

Policy

All chemicals require SDS and labeling.

Minimum Requirements / Procedures

- 83. Submit SDS prior to use.
- 84. Maintain labels and secondary container labels.
- 85. Train workers and provide PPE per SDS.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC maintains SDS access location and reviews submittals.
- SSR audits chemical storage.

Subcontractors – Minimum Requirements

- Provide SDS and training; store chemicals properly.

Prohibited Practices

- Unlabeled containers

Required Documentation

- SDS submittal log

Inspection / Verification

- Weekly storage checks

Enforcement

- Removal of unauthorized chemicals

OSHA / Reference Standards:

- 29 CFR 1926.59

22. Silica Exposure Control

Purpose

Prevent overexposure to respirable crystalline silica.

Scope

Silica-generating tasks.

Policy

Use engineering controls and respiratory protection when required.

Minimum Requirements / Procedures

- 86. Use water/vacuum controls.
- 87. Restrict access to high-dust areas.
- 88. Follow OSHA Table 1 controls where applicable (29 CFR 1926.1153)
- 89. Implement respiratory program when required.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC coordinates work sequencing and controls.
- SSR verifies control methods.

Subcontractors – Minimum Requirements

- Provide compliant tools and controls and exposure management.

Prohibited Practices

- Dry cutting without controls

Required Documentation

- Silica control plan (employer)

Inspection / Verification

- Field verification

Enforcement

- Stop work for uncontrolled exposures

OSHA / Reference Standards:

- 29 CFR 1926.1153

23. Fire Prevention and Emergency Action

Purpose

Ensure readiness for emergencies and prevent fires.

Scope

All site operations.

Policy

Emergency procedures must be communicated and fire hazards controlled.

Minimum Requirements / Procedures

- 90. Post emergency numbers and address.
- 91. Establish muster points.
- 92. Maintain extinguishers and control combustibles.
- 93. Conduct drills when required.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC establishes muster points and emergency postings.
- SSR verifies readiness.

Subcontractors – Minimum Requirements

- Participate in emergency procedures and maintain access routes.

Prohibited Practices

- Blocking egress

Required Documentation

- Emergency postings
- Inspection logs

Inspection / Verification

- Monthly checks of extinguishers

Enforcement

- Stop work for blocked egress

OSHA / Reference Standards:

- 29 CFR 1926.150
- 29 CFR 1926.151

24. First Aid and Medical Response

Purpose

Ensure timely medical response and reporting.

Scope

All injuries/illnesses.

Policy

Provide first aid access and report injuries promptly.

Minimum Requirements / Procedures

- 94. Maintain first aid supplies.
- 95. Call 911 for emergencies and notify supervision.
- 96. Document incidents promptly.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC coordinates site first aid station and emergency information.
- SSR manages reporting workflow.

Subcontractors – Minimum Requirements

- Provide first aid supplies for crews as required.
- Report injuries immediately.

Prohibited Practices

- Failing to report injuries

Required Documentation

- Incident reports

Inspection / Verification

- Review logs weekly

Enforcement

- Discipline for failure to report

OSHA / Reference Standards:

- 29 CFR 1926.50

25. Incident Reporting and Investigation

Purpose

Ensure incidents are reported, investigated, and corrected.

Scope

All incidents and near misses.

Policy

All incidents must be reported immediately and investigated to prevent recurrence.

Minimum Requirements / Procedures

- 97. Report immediately.
- 98. Preserve scene when possible.
- 99. Conduct root cause analysis.
- 100. Implement corrective actions and share lessons learned.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC leads investigations for serious incidents.
- SSR maintains corrective action tracking.

Subcontractors – Minimum Requirements

- Participate in investigations and provide statements.

Prohibited Practices

- Concealing incidents

Required Documentation

- Incident report forms
- Corrective action logs

Inspection / Verification

- Management review of serious incidents

Enforcement

- Removal for falsification

OSHA / Reference Standards:

- 29 CFR 1904 (reference)

26. Inspections, Audits, and Corrective Actions

Purpose

Verify controls and close hazards to prevent incidents.

Scope

All work areas.

Policy

Inspections and corrective actions are mandatory and tracked to closure.

Minimum Requirements / Procedures

101. Conduct daily walk-through inspections.
102. Perform weekly documented audits.
103. Assign corrective actions with due dates and verify closure.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC performs audits and tracks closure.
- SSR trends repeat issues.

Subcontractors – Minimum Requirements

- Correct hazards in your scope promptly.

Prohibited Practices

- Ignoring corrective actions

Required Documentation

- Inspection reports
- Corrective action log

Inspection / Verification

- Weekly closure verification

Enforcement

- Stop work for unresolved serious hazards

OSHA / Reference Standards:

- 29 CFR 1926.20(b)

27. Substance Abuse and Fitness for Duty

Purpose

Prevent impairment-related incidents.

Scope

All personnel.

Policy

Zero tolerance for illegal drugs, alcohol, or impairment.

Minimum Requirements / Procedures

104. Remove suspected impaired individuals from site.
105. Follow post-incident procedures when applicable.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC enforces site removal policy.
- Leadership supports enforcement.

Subcontractors – Minimum Requirements

- Employers enforce policy and cooperate with investigations.

Prohibited Practices

- Working impaired

Required Documentation

- Removal documentation (as applicable)

Inspection / Verification

- Supervisor observation

Enforcement

- Immediate removal from site

OSHA / Reference Standards:

- OSHA General Duty Clause (reference)

28. Workplace Violence Prevention and Conduct

Purpose

Maintain safe workplace behavior and prevent threats/violence.

Scope

All personnel.

Policy

Threats, harassment, intimidation, and violence are prohibited.

Minimum Requirements / Procedures

- 106. Report concerns immediately.
- 107. Remove individuals posing a threat.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC coordinates response and communication.
- SSR documents incidents.

Subcontractors – Minimum Requirements

- Employers remove offenders and cooperate with response.

Prohibited Practices

- Threats or intimidation

Required Documentation

- Incident documentation

Inspection / Verification

- Supervisor checks

Enforcement

- Immediate removal

OSHA / Reference Standards:

- OSHA workplace violence guidance (reference)

29. Crisis Communication Plan

Purpose

Control external communication during incidents.

Scope

All incidents and emergencies.

Policy

Only designated spokespersons may communicate externally about incidents.

Minimum Requirements / Procedures

- 108. Direct inquiries to GC leadership.
- 109. Do not post incident info on social media.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- PM/Superintendent manages communication chain.
- SSR preserves documentation.

Subcontractors – Minimum Requirements

- Do not speak to media or post publicly.

Prohibited Practices

- Unauthorized media statements

Required Documentation

- Communication log (as needed)

Inspection / Verification

- Review after incidents

Enforcement

- Removal for violations

OSHA / Reference Standards:

- Best practice

30. Disciplinary Policy and Enforcement

Purpose

Ensure consistent enforcement of safety rules.

Scope

All personnel.

Policy

Safety violations will be addressed using progressive discipline up to removal from site.

Minimum Requirements / Procedures

- 110. Document violations.
- 111. Escalate repeat or serious violations.
- 112. Remove individuals for willful or life-threatening violations.

Roles & Responsibilities

Internal (The Construction Collaborative) – Implementation

- GC enforces consistently and documents actions.
- Leadership supports removal decisions.

Subcontractors – Minimum Requirements

- Employers discipline their employees and cooperate with GC enforcement.

Prohibited Practices

- Repeat fall protection violations

Required Documentation

- Violation notices
- Removal records

Inspection / Verification

- Audit enforcement consistency

Enforcement

- Contract remedies

OSHA / Reference Standards:

- 29 CFR 1926.20

Appendix A: Field Forms and Templates

The following templates may be copied and used on projects:

- Site Orientation Checklist
- Toolbox Talk Form
- JHA / Pre-Task Plan Form
- Corrective Action Log
- Incident Report Form
- Scaffold Erection Permit
- Hot Work Permit
- Confined Space Entry Permit

Appendix B: Site Orientation Checklist (Template)

- Sign-in and access control procedures
- Emergency numbers, address, and muster point
- PPE requirements
- Fall protection rules and floor opening controls
- Hot work and confined space permit process
- Hazard communication and SDS location
- Traffic control and pedestrian routes
- Housekeeping expectations
- Substance abuse policy

Appendix C: Toolbox Talk Template

Topic: _____ Date: _____ Trade: _____

Key hazards discussed: _____

Controls/PPE: _____

Presenter: _____

Attendees (print/sign): _____

Appendix D: JHA / Pre-Task Plan Template

Task: _____ Location: _____

Crew: _____ Date: _____ Time: _____

Hazards: _____ Controls: _____

PPE: _____ Tools/Equipment: _____

Coordination Needed: _____

Supervisor/Competent Person Signature: _____

Appendix E: Corrective Action Log Template

Date	Issue/Hazard	Immediate Control	Corrective Action	Responsible	Closed Date