

Generated Report

Non-Conformance Report

Executive non-conformance report for critical work-at-height safety breach and contractor control failure.

AI Risk Score

92

Critical Risk

STATUS

● Open

NCR ID
NCR-20260610-175931996

ISSUED
10 Jun 2026

NCR SUMMARY

Item	Details	Item	Details
NCR ID	NCR-20260610-175931996	Date	2026-06-10
Time	18:02 UTC	Site	XXX — Power Plant
Location	Office Building Construction Area	Contractor	Protem; user note references DEMO Company worker/subcontractor
Category	Critical Immediate NCR; Safety NCR; Contractor NCR; PPE / Fall Protection NCR; Work-at-Height NCR	Severity	Critical — Risk Band: Critical
Status	Open	Evidence	2 Photos + User Notes + AI Visual Analysis; No Voice Transcript

PHOTO 1

Caption:

Field Evidence Submitted by User — Following non-conformances observed during the site visit involving work performed by subcontractor DEMO Company. Worker working at height without 100% fall protection at office building construction area.

AI Analysis:

A worker is visible at height on or near vertical formwork/reinforcement adjacent to an open construction edge. No full-body harness, lanyard, secured anchorage, lifeline, edge protection, or certified work platform is clearly visible. The surrounding area includes uneven excavation, loose timber, rebar bundles, temporary formwork materials, and incomplete access control. Multiple workers appear present below the elevated work area, creating potential exposure to falling persons and dropped objects.

User Note:

Following non conformances observed during the site visit which the work performed by subcontractor DEMO Company Worker working at height without %100 fall protection at office building construction area.

Voice Insight:

No voice transcript provided.

Combined Finding:

A contractor worker was observed performing work at height without verified 100% fall protection in an active construction zone with additional exposure to falls, dropped objects, poor housekeeping, and inadequate work-at-height controls.



PHOTO 2

Caption:

Field Evidence Submitted by User — A handmade wooden ladder is used and without fall protection by the DEMO Company worker at the office building construction site area.

AI Analysis:

A worker is standing on a handmade wooden ladder positioned against a concrete structure. The ladder does not appear to be an industrial-rated access ladder and no visible securing, stabilizing, footing control, inspection tag, or fall-arrest system is present. The worker appears to be using one hand to perform work while elevated, creating reduced stability. Nearby scaffold elements and formwork are present, but the ladder is being used instead of a controlled access platform.

User Note:

A handmade wooden ladder is used and without fall protection by the DEMO company worker at the office building construction site area.

Voice Insight:

No voice transcript provided.

Combined Finding:

A contractor worker used a non-certified handmade wooden ladder for elevated work without fall protection, indicating unsafe access selection, inadequate supervision, and failure to control work-at-height risk.

- ##### Attachment Evidence Summary



1. EXECUTIVE SUMMARY

During the site visit at the XXX Power Plant Office Building Construction Area, a critical non-conformance was identified involving contractor work-at-height activities. The evidence shows workers performing elevated work without verified 100% fall protection and using a handmade wooden ladder that does not appear suitable, certified, secured, or controlled for construction access.

The condition represents a serious breach of fundamental work-at-height controls and contractor safety management expectations. The exposure includes potential fatal or life-altering injury from fall from height, falling materials, unstable access equipment, and uncontrolled work sequencing in an active construction environment.

Immediate intervention is required. The work activity must be stopped until compliant access equipment, fall protection systems, supervision, permits, and competency controls are verified. Contractor accountability must be reviewed, including clarification between the principal contractor Protom and the referenced DEMO Company subcontractor.

2. DETAILED NON-CONFORMANCE DESCRIPTION

Two visual evidence records confirm unsafe work-at-height practices in the office building construction area:

- In Photo 1, a worker is positioned at elevation near vertical formwork/reinforcement and an open structural edge. There is no visible full-body harness, double lanyard, lifeline, certified anchorage, guardrail protection, or properly designed working platform. Workers below are potentially exposed to dropped objects and fall-related secondary impacts.
- In Photo 2, a worker is using a handmade wooden ladder as an access and work-positioning method. The ladder appears non-standard and unsuitable for controlled construction work at height. It is not visibly secured, tagged, inspected, or stabilized. The worker is not visibly tied off and is working from an unstable position.

The work environment also shows active construction hazards including loose timber, reinforcement bars, excavation edges, incomplete temporary structures, and limited visible barricading or signage. These combined conditions indicate a failure to implement effective work-at-height planning, supervision, access control, and contractor compliance verification.

This non-conformance is classified as a Critical Immediate NCR due to the credible potential for fatal fall injury and the visible absence of essential fall-prevention controls.

3. VIOLATED REQUIREMENT / STANDARD

The observed conditions are inconsistent with recognized HSE, construction safety, and contractor management requirements, including but not limited to:

- Work at Height Control Requirements
- Work at height must be avoided where possible, properly planned, risk assessed, supervised, and performed using suitable equipment.
- 100% fall protection must be maintained where there is exposure to fall risk and where collective protection is not sufficient.
- Workers must use full-body harnesses, compatible lanyards, certified anchor points, lifelines, or engineered platforms where required.
- OSHA-Aligned Fall Protection Principles
- Employees exposed to fall hazards must be protected by guardrail systems, safety net systems, or personal fall arrest systems.
- Portable ladders must be suitable, inspected, used at correct angle, secured where necessary, and not improvised or handmade unless engineered and approved for that purpose.
- Unsafe access equipment must be removed from service.
- ISO 45001 Occupational Health and Safety Management Expectations
- Hazards must be identified and controlled before work starts.
- Contractor activities must be controlled through planning, communication, monitoring, and competence verification.
- Operational controls must be implemented for high-risk activities.
- Permit to Work / Job Safety Analysis Requirements
- Work-at-height activity must be covered by a valid risk assessment, method statement, permit where applicable, rescue plan, and pre-task briefing.
- Controls must be verified at the work front before authorization.
- Contractor Management Requirements
- Contractors and subcontractors must comply with site HSE rules.
- Supervisors must prevent unsafe work and remove non-compliant equipment.
- Contractor performance deficiencies must be formally recorded, corrected, and trended.
- Housekeeping and Access/Egress Requirements

4. POTENTIAL CONSEQUENCES

Potential consequences include:

- Fatality or serious injury from fall from height.
- Multiple trauma including head injury, spinal injury, fractures, internal injury, or permanent disability.
- Worker falling onto reinforcement, formwork, timber, excavation surfaces, or lower-level personnel.
- Dropped tools or materials striking workers below.
- Ladder collapse, slip, kick-out, or overturning due to non-certified handmade construction and lack of stabilization.
- Secondary incidents involving rescue delay due to absence of rescue planning.
- Regulatory enforcement action, stop-work order, penalties, or prosecution.
- Contractor suspension or formal performance escalation.
- Project delay due to unsafe work stoppage and rework of access arrangements.
- Reputational damage to the project and management team.
- Increased insurance, legal, and compensation exposure.

5. AI-DETECTED ADDITIONAL RISKS

Independent review of the visual evidence identified the following additional risks beyond the user-submitted notes:

- Inadequate visible barricading below elevated work areas.
- Potential dropped-object exposure to personnel working or standing below.
- Poor housekeeping, including scattered timber, rebar bundles, debris, and loose materials.
- Uneven ground and excavation conditions creating slip, trip, and fall hazards.
- Possible incomplete scaffold or scaffold not being used as the primary safe access method.
- Lack of visible work-at-height warning signage or exclusion-zone control.
- Open edges and incomplete structural areas requiring collective protection.
- Temporary formwork and vertical reinforcement creating impalement or struck-by exposure.
- Potential absence of ladder inspection/tagging system.
- Lack of visible supervision at the exact point of unsafe elevated work.
- Possible failure of pre-task risk assessment, toolbox talk, or permit verification.
- Contractor/subcontractor control gap due to discrepancy between recorded contractor name and user-referenced DEMO Company worker.

6. ROOT CAUSE ANALYSIS

Likely root causes include:

- Weak work-at-height supervision: Unsafe elevated work was allowed to proceed without visible fall-prevention or fall-arrest controls.
- Inadequate contractor control: Contractor and subcontractor compliance monitoring appears ineffective at the work front.
- Poor access planning: Workers used improvised or unsuitable access rather than engineered, certified, and inspected access equipment.
- Failure to enforce 100% tie-off requirements: No visible evidence confirms proper harness, lanyard, lifeline, anchorage, or equivalent collective protection.
- Inadequate pre-task risk assessment: The hazards associated with height, ladder use, open edges, dropped objects, and ground conditions were not adequately controlled before starting work.
- Insufficient permit-to-work verification: Work-at-height permit controls, if required, were either absent or not effectively implemented.
- Unsafe work culture / normalization of deviation: Handmade ladder use and unprotected elevated work suggest unsafe practices may have become tolerated.
- Poor housekeeping ownership: Materials and debris were not controlled to maintain safe access, working space, and exclusion zones.
- Resource or equipment deficiency: Suitable scaffold, mobile platform, certified ladder, anchor system, or fall-protection equipment may not have been available or mandated before work.
- Training and competency gaps: Workers and supervisors may not fully understand fall protection hierarchy, ladder limitations, and

7. CORRECTIVE ACTIONS

Priority	Action	Responsible	Due
Immediate	Stop all work-at-height activities in the affected office building construction area until controls are verified.	Site Management / HSE / Contractor Supervisor	Immediate
Immediate	Remove the handmade wooden ladder from service and quarantine it to prevent further use.	Contractor Supervisor / HSE	Immediate
Immediate	Confirm all workers performing work at height have full-body harnesses, compatible lanyards, certified anchorage, or collective protection before resuming work.	Contractor Supervisor / HSE	Immediate
Immediate	Establish an exclusion zone below elevated work areas to protect personnel from falling persons, tools, and materials.	Construction Supervisor	Immediate
High	Conduct a work-at-height permit, risk assessment, method statement, and rescue-plan review for the activity.	Site HSE / Construction Manager	Within 24 hours
High	Inspect all ladders, scaffolds, access platforms, and temporary work systems; remove uncertified or damaged equipment from service.	Scaffold Inspector / HSE / Contractor	Within 24 hours
High	Verify scaffold suitability and ensure any scaffold used has complete guardrails, safe access, stable foundation, and inspection tag.	Competent Scaffold Inspector	Within 24 hours
High	Conduct a mandatory toolbox talk for all contractor and subcontractor workers on 100% fall protection, ladder safety, and stop-work authority.	Contractor HSE / Site HSE	Within 24 hours
High	Identify the actual employer of the observed workers and clarify accountability between Protem and the referenced DEMO Company subcontractor.	Project Management / Contractor Management	Within 24 hours
Medium	Improve housekeeping by removing loose timber, rebar, debris, and unused materials from access routes and work zones.	Contractor Supervisor	Within 48 hours

Medium	Install visible work-at-height warning signage and access restriction controls around the affected area.	Site HSE / Contractor	Within 48 hours
Medium	Record this NCR in contractor performance monitoring and require formal corrective action evidence before closure.	HSE Manager / Contract Owner	Within 3 days

8. PREVENTIVE ACTIONS

Action	Benefit
Implement a site-wide work-at-height compliance campaign covering 100% tie-off, access equipment selection, and rescue readiness.	Reduces recurrence of unprotected elevated work and reinforces critical safety expectations.
Establish a mandatory access-equipment inspection and color-tag system for ladders, scaffolds, and temporary platforms.	Prevents use of handmade, damaged, uncertified, or unsuitable access equipment.
Require pre-work verification by supervision before any work-at-height task starts.	Ensures controls are confirmed at the point of work rather than only in documentation.
Strengthen contractor and subcontractor HSE induction with specific work-at-height competency checks.	Improves contractor understanding of site rules and critical risk controls.
Conduct weekly focused inspections on high-risk construction activities, including work at height, lifting, excavation, and temporary works.	Provides proactive monitoring and early detection of unsafe conditions.
Introduce a disciplinary and recognition framework aligned with Just Culture principles.	Encourages safe behavior while addressing repeated or willful non-compliance.
Require method statements to specify approved access equipment and fall-protection arrangements for each task phase.	Prevents workers from improvising unsafe access solutions in the field.
Improve material storage and housekeeping zoning around the office building construction area.	Reduces trip, struck-by, impalement, and access obstruction risks.
Maintain a contractor performance dashboard for NCR trends, repeat findings, and closure effectiveness.	Supports management visibility and targeted contractor improvement.
Perform periodic management safety walks focused on critical risk controls.	Demonstrates leadership commitment and validates field-level control implementation.

9. MANAGEMENT REVIEW NOTES

This NCR requires immediate management attention due to the critical nature of fall-from-height exposure. The evidence indicates that essential work-at-height controls were not effectively implemented or enforced. The use of a handmade wooden ladder and the absence of visible 100% fall protection represent a serious failure in operational control.

Management should require the contractor and any involved subcontractor to submit a written corrective action plan, including evidence of worker retraining, equipment inspection, supervisor accountability, and updated method statements. Work should not resume until the site HSE team and construction management jointly verify that compliant access, fall protection, barricading, and rescue arrangements are in place.

The discrepancy between the recorded contractor name, Protem, and the user note referencing DEMO Company should be formally clarified. If DEMO Company is a subcontractor under Protem, Protem remains accountable for subcontractor control unless the contract structure states otherwise. Contractor performance escalation is recommended due to the critical risk exposure.

10. CLOSURE VERIFICATION REQUIREMENTS

Before this NCR can be closed, the following evidence must be submitted and verified:

- Photographic evidence showing compliant access equipment replacing the handmade wooden ladder.
- Confirmation that the handmade ladder has been removed, destroyed, or permanently taken out of service.
- Work-at-height permit or equivalent authorization reviewed and approved.
- Task-specific risk assessment and method statement updated to include fall-protection and access controls.
- Evidence of certified anchor points, lifelines, guardrails, scaffold tag, or approved working platform as applicable.
- Records confirming worker training for work at height, ladder safety, and fall-arrest equipment use.
- Evidence of toolbox talk attendance for all affected workers and supervisors.
- Rescue plan for fall-at-height scenarios reviewed and communicated.
- Housekeeping completed in the work area, including removal or controlled storage of loose timber, debris, and rebar.
- Exclusion zones installed below elevated work areas.
- Competent person inspection records for scaffold, ladder, and temporary access systems.
- Contractor/subcontractor accountability clarified and corrective action formally accepted by site management.
- HSE verification inspection completed with no repeat critical findings.
- Management approval confirming readiness to close the NCR.

FINAL STATUS RECOMMENDATION: Escalate to Management

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