

Title: Contractor Safety
Department:
Frequency of Review:
Date of Next Review:

Policy Number:
Policy Owner:
Last Reviewed:
Effective Date:
Published By:

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Contractor Safety Policy

I. Overview/Objective:

The purpose of this policy is to ensure that all employees, visitors, contractors and other personnel are protected, so far as is reasonably practicable, from safety and health hazards and have received appropriate guidance in support of Company's Safety and Health Management System regarding contractor safety.

II. Company Policy:

Protection of employees, visitors, contractors and other personnel, so far as is reasonably practicable, by the implementation of appropriate controls is a corporate requirement. To ensure that Company and its affiliated companies develop, implement and manage effective contractor safety processes, the requirements of our "[Contractor Safety Process Model for Construction and Non-Construction Applications](#)" must be met. At a minimum, the requirements contained in this policy and all national, local and other regulatory requirements must be met with regard to contractor safety. Additionally, best practice standards should be identified and implemented as appropriate. The contractor safety process models can be accessed at the following web site address.

III. Responsibilities:

It is expected that all Company operations will review and become familiar with the models and ensure that the elements and methodologies are applied. Because of the varying nature of contractor projects, there is flexibility in the application. Each organization should carefully review the models and apply the elements as appropriate to ensure that contractor related activities are properly and safely managed.

The management at each facility is responsible for ensuring that assignments of responsibilities associated with this policy are made as needed to ensure that the policy requirements are met. These responsibilities include:

- a) Assignment of a competent person or persons to manage and provide oversight of the contractor safety program.
- b) Development and maintenance of a written contractor safety program that includes the elements of the contractor safety process models for construction and non-construction applications.
- c) Coordination of project/work activity safety planning efforts for all project/work activity phases.
- d) Development and management of a contractor pre-qualification process.
- e) Development and communication of contractor requirements and guidelines including safety specifications and performance expectations regarding the project/work activity.
- f) Development of contractor selection and contract award processes.

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- g) Contractor orientation including communication of contractor safety guidelines and applicable facility programs and rules to contractors prior to on-site activities.
- h) Verification of contractor work performance to ensure that project safety requirements are being met.
- i) Establishment of project completion and documentation retention processes.
- j) Establishment of contractor performance and date evaluation processes.
- k) Establishment of processes for communication of project/work activity results.
- l) Provision for periodic review, evaluation and continuous improvement of the contractor safety program.

IV. Methodology:

1. Assign a competent person or persons the responsibility to manage and provide oversight of the contractor safety program.
2. Develop, implement and maintain a written facility-specific contractor safety program. All elements of the contractor safety process models for construction and non-construction applications should be included in the written program. These elements include but are not limited to:
 - a) Contractor pre-qualification, screening and selection processes based on considerations such as:
 - experience modification rate
 - injury and illness frequency and severity rates
 - contractor safety program including the safety and health manual, safe work plans, required inspections, incident investigation process, required written programs and training records.
 - regulatory agency interface history
 - b) Development and communication of contractor requirements and guidelines including safety specifications and performance expectations regarding the project/work activity. These should include the following elements:
 - roles and responsibilities for project planning, engineering and design and procurement of contractor services
 - bid specifications that include at a minimum:
 - requirements for a contractor/operation specific site safety plan
 - safety staffing/competent person requirements
 - permits and safety related certifications that may be required
 - safety training and orientation delivered by the general contractor
 - recordkeeping and safety performance reporting
 - safety inspections
 - toolbox and other safety meeting expectations

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- specific procedures for control or minimization of hazards when special high risk hazards are anticipated
 - inclusion of the safety manual or safety requirements in the request for quote
- c) Development of contractor selection and contract award processes that include the following elements:
- bid evaluation process including a post-bid meeting with contractors
 - application of an appropriate evaluation and weighting process
 - communication of information to all contractors regarding the positive and negative elements of their safety proposals and the impact safety had on the selection process
 - incorporation by reference of the safety requirements identified in the bid specification document in contract documents or purchase orders.
- d) Coordination of project safety planning efforts for all project/work activity phases.
- e) Contractor orientation including communication of contractor safety guidelines and applicable facility programs and rules to contractors prior to on-site activities. Include items such as:
- personal protective equipment requirements
 - facility safety rules and procedures
 - location of first aid equipment and medical facilities
 - emergency response plan information
 - considerations for drug and alcohol screening
 - safe work permit requirements (welding, confined space entry, live electrical work, etc.)
 - fire alarms, safety shower and eyewash stations
 - site access and security
- f) Completion of a pre-job safety and orientation meeting with the contractor to discuss job-specific hazards and safety requirements. Job specific hazards may include:
- working at heights
 - trenching and shoring
 - high electrical voltages
 - confined space entry
 - noise
 - process safety
 - material safety data sheets
 - asbestos
 - fire, explosion and reactive hazards
 - chemical hazard exposures
 - physical hazard exposures
 - welding and cutting
 - use of cranes and other heavy material handling equipment

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- use of powered industrial vehicles
- g) Identification of specific Company workplace hazards near or in the contractor work area and communication of information to the contractor regarding the hazards.
- h) Establishment of a process for notifying Company representatives of all incidents involving injury or property damage.
- i) Verification of contractor work performance to ensure that project safety requirements are being met. This verification process should include:
 - periodic tours with the contractor safety representative of the contractor work area to observe conditions and worker activities
 - periodic attendance at contractor safety meetings
 - periodic review of safety meeting minutes and follow-up actions
 - periodic review of contractor safety inspections and corrective action process
 - periodic review of contractor incident investigations and corrective action process
- j) Establishment of project completion and documentation retention processes.
- k) Establishment of contractor performance and date evaluation processes including:
 - review and rating of each contractor regarding overall project/work activity success and results
 - communication of the performance results to the contractor(s)
 - internal (Company) review of the overall project/work activity efforts
- l) Establishment of processes for communication of project/work activity results including:
 - communication to project/work activity managers
 - Recommendations for project management process improvements regarding safety performance, quality, contractor performance, project management, cost, etc.
- m) Provision for periodic review, evaluation and continuous improvement of the contractor safety management program.

V. Effectiveness Measures/Continuous Improvement: i.e. observations, audits, testing, verbal confirmation, output measures.

1. Conduct a periodic contractor safety program review that includes program evaluation and continuous improvement as appropriate.
2. Number of contractor injuries that occur at Company Facilities.
3. Number of instances of nonconformance to facility contractor safety management standards as determined by internal audits.

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VI. Definitions:

Competent Person: An individual, who by way of training and/or experience is knowledgeable of applicable standards, is capable of identifying workplace hazards relating to the specific operation, is designated by the employer, and has authority to take appropriate actions.

Construction: Work consisting of construction, demolition, alteration, and/or repair, including painting and decorating that is performed by a contractor.

Contractor: A person or persons not directly affiliated with the facility or operation that contracts to perform work or provide services at a Company or affiliated company location.

Experience Modification Rate: Injury and illness rates calculated by the contractor's insurance company based on past injury and illness claims and compared to the average claims submitted by other policy holders in that particular industry. A modification rate of 1.0 indicates that a company is equal to the average for their industry. Greater than 1 would indicate a worse than average rate and less than 1 would indicate a better than average rate.

Incident Rate or Frequency: The rate or frequency of recordable injuries and illnesses per 100 employees per year. Calculation of incident rates for recordable, lost workday and restricted activity cases requires the following information:

- a) The total number of recordable nonfatal injury and illness cases, total number of lost workday cases and the total number of restricted activity cases.
- b) The number of hours all employees actually worked. Use payroll or other time records. "Hours worked" should not include any non-work time, even though paid, such as vacation, sick leave, holidays, etc.

Incident rates are computed by using the following formula:

$$\text{(Number of recordable nonfatal injury and illness cases x 200,000*) / employee hours worked} = \text{incident rate}$$

*Note: The 200,000 hours in the formula represents the equivalent of 100 employees working 40 hours per week, 50 weeks per year, and provides the standard base for the incident rates.

This formula should be used to compute incident rates for recordable injury and illness cases, lost workday injury and illness cases, restricted work activity cases and severity (lost workdays per 100 workers per year) rates.

VII. Subject Matter Experts:

All departmental team members of Company Worldwide Safety Management Services, with the aid of other internal and external resources, are available as subject matter resources for

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assistance and guidance in meeting the requirements of this corporate policy. Immediate support, advice and assistance with the subject matter of this policy should be accessed from your designated Safety Management Services point of contact.

VIII. Other Resources or References:

1. United States Department of Labor, Occupational Safety and Health Administration (OSHA), 29CFR Part 1926 - Standards for the Construction Industry
2. Saint Paul Travelers, Guide to Best Practices for Subcontractor Selection and Control, 2001
3. American National Standard (ANSI) A10.33-1992, Construction and Demolition Operations - Safety and Health Program Requirements for Multi-Employer Projects
4. Construction Industry Institute, Research Summary 160-1, Safety Plus: Making Zero Accidents A Reality. February 2003
5. Construction Industry Institute, Research Summary 190.1, The Owner's Role in Construction Safety, March 2003