

Contractor Safety

Note: The document below outlines the details for your location based on United States and local process elements. Latest U.S. revisions are indicated in red text with white background. Latest local revisions are indicated in red text with yellow background.

Quick links to sections

- [Objective](#)
- [Scope](#)
- [Roles & Responsibilities](#)
- [Process Elements](#)
- [Control Points](#)
- [Documentation](#)
- [Definitions](#)
- [References](#)
- [Revision History](#)

I. Objective

Company requires work performance by contractors that provides a safe and healthy workplace in compliance with applicable laws, regulations and contract terms and conditions. This process provides requirements for the safety and health aspects of Company's interaction with contractors, and describes the controls used to minimize risks.

II. Scope

This process applies to all Company owned and/or leased facilities where Company manages the facility operations. It also applies at customer locations where employees are present and the contracted activities have the potential to adversely affect the well-being of Company's employees, visitors, other Company contractors, or customers.

Evaluation, approval, and monitoring/oversight of contracted activity is dependant upon whether the contracted work is classified as Low, Moderate or High Risk, and can include the following types of contractors.

Facilities/Construction Contractors – contractor companies that provide project-oriented facilities type work, such as construction, rearrangement, or equipment/furniture installation.

Embedded Contractors – contractors placed within Company departments to assist with long or short term staffing needs or to provide a needed skill or technical or administrative task-specific work.

Vendor on Premises – (also know as Full Service Vendors [FSV]) contractors providing definable / turnkey activities such as reproduction services, mailroom operations, shipping/receiving operations, food services, medical services, manufacturing, etc.

Service Contractors - manufacturer's representatives or dealers that provide installation or maintenance service for Company owned or leased equipment. Typically, service contractors maintain and/or repair office, manufacturing or laboratory equipment, machines, or instruments.

Subcontractor – Another company and its employees, hired by a primary contractor, to assist the primary contractor in performing work for Company.

III. Roles & Responsibilities

Management Requesting Contracted Services (Requester of Services) is responsible to:

1. Ensure that only qualified contractors are engaged to perform work.
2. Ensure that contractors are informed of Company safety requirements via the **applicable** Company US contractor guide, as appropriate.
3. Ensure that contractor activities are monitored against contract and Company requirements as defined in the applicable contractor guide.
4. Designate an Company Representative to act as the primary interface between Company and contractor personnel. For High Risk activities, a competent person must be identified to oversee the contracted work being performed.

Contractor companies are responsible to inform their subcontractors of Company requirements and any necessary safety information, and to monitor their subcontractors for compliance to contract and Company requirements. Contractors are expected to have their own technical health and safety expertise.

Company **Representative** is responsible to:

1. Understand and ensure compliance to the requirements identified in the Company US Contractor Environmental & Safety Guide, or local contractor guide, as applicable.
2. Maintain a technical liaison with the contractor company,
3. Perform oversight and monitoring of contractor activities, commensurate with the risk inherent in the contracted work, addressing any safety failures with the contractor, with the assistance of Purchasing as appropriate.
4. Ensure Company is informed of potential hazards to Company employees associated with contractor activities,
5. Ensure appropriate permits or work approvals are obtained for contractor work.
6. Ensure contractor management reports serious contractor work-related injuries/incidents occurring while performing work for Company

Facilities/Real Estate and Site Operations (RESO) may contract out facilities design/construction, rearrangement, maintenance or other activities for Company locations, and will therefore have the duties of Management Requesting Contracted Services, in addition to the following.

Where full-service contracts are established, Facilities/RESO is responsible to ensure that:

1. The contractor conducts its work activities in a manner that is safe and compliant with all applicable Company and regulatory requirements,
2. The contractor addresses safety and regulatory compliance of its subcontractors when performing work on Company's behalf,
3. The contractor uses a process for selecting, qualifying and monitoring its subcontractors that meets the requirements of this process.

Global Well-Being Services (GWBS) is responsible for:

1. Developing information tools,
2. Providing advice and assistance as necessary to Company management and program development.

IV. Process Elements

A. Determining Risk

1. Company evaluation, approval, and the level of monitoring and oversight of contractor activities depends on the risk associated with the work performed by the contractor. The Requestor of Services must identify whether the type of work to be contracted is Low, Moderate or High Risk. If you are unsure of the risk factor associated with a particular type of contracted work, contact a [GWBS](#) representative.

2. **Low Risk** contracted work is usually associated with office or administrative type areas. Low Risk work includes such activities as:

- design
- consulting
- inspection
- training
- information technology services (programming, system monitoring, help desk services)
- delivery
- furniture installation or moving
- janitorial services (unless cleanup of blood/bodily fluids is included in the contract)
- secretarial/administrative services
- calibration/maintenance/testing of medical equipment
- installation/servicing of IT, telephone, connectivity or manufacturing or laboratory equipment that does not require lockout/tagout or live electrical work
- use of small quantities of chemicals by equipment service contractors, which are specified by the equipment manufacturer or service provider, and used as the manufacturer intended

3. **Moderate Risk** contracted work includes facility support services or activities for new construction, renovation or demolition of existing facilities, or maintenance or servicing of equipment, and includes the following:

- carpet installation
- hot work (welding, grinding, open flame)
- chemical use such as paints, compressed gases, cleaners, detergents, oils, solvents, corrosives
- electrical installations (except for working with live hazardous voltages above 50 volts, which is considered High Risk work)
- control of hazardous energies (lockout/tagout)
- material handling, including use of ladders, powered industrial vehicles
- elevated work not requiring fall protection
- work under raised floors

4. **High Risk** work is identified as specific activities associated with facility or equipment support services or activities, where the level of risk is such that an accident or incident could produce a serious outcome. The Table below lists examples of High Risk activities.

<u>High Risk Work Activities</u>	<u>Examples</u>
Disturbing/abatement of asbestos containing materials	Work with asbestos containing materials such as floor or ceiling tiles, pipe insulation, fireproofing, etc.
Removal or demolition of lead containing materials	Activities where there is the potential to create dust or fume from removal or abatement of lead containing materials such as paint, piping or solder
Work requiring exposure to biological hazards	Potential exposure to blood, body fluids or microbial agents, by contracted medical, security, or custodial services
Elevated work requiring fall protection, where a fall could result in serious injury	Erecting or working on scaffolding, boatswain’s chairs, scissors/platform lifts, work on towers, work requiring fall protection due to an unprotected edge or opening
Work on pressurized systems	Boilers, tanks, or piping that are under pressure
Work with ionizing radiation sources or X-rays	Use of contractor supplied X-ray equipment, radioactive materials
Work with lasers over 5 milliwatts or with invisible beams	Use of contractor supplied devices for communications, metrology or leveling devices
Confined space entry	Work in tanks, pits, vessels, silos, storage bins, manholes, or vaults
Excavation work	Excavation and trenching activities associated with new building construction, installation of underground services, etc.
Live electrical servicing	Work on or near energized electrical circuits with potential exposure to voltages between 50 and 600 volts

Facility high voltage work	Work on electrical substations or power distribution centers with potential exposure to voltages above 600 volts
Use of hazardous chemicals in a manner that could adversely affect the safety and health of personnel or the environment	Spraying pesticides, use of hazardous chemicals, disposal of hazardous waste
Lifting equipment / operations	Use of mobile cranes, hoists, or helicopters to place or move heavy items/equipment
Use of explosive, powdered, pneumatic, or fuel powered fasteners	Nail guns, Ramset, Hilti etc.

B. Evaluation and Approval

1. Company requires safety evaluation and approval of contractors performing High Risk work. Contract companies performing High Risk work for Company must be evaluated to determine if they have the necessary skills and experience to perform the work safely, prior to being selected and/or performing High Risk work. The Requestor of Services is responsible for the evaluation and approval of High Risk contractors. Contracted High Risk work must be assigned only to an approved contractor.
2. Low or Moderate Risk work does not require prior or formal contractor evaluation and approval. However, selection of experienced contractor companies is strongly recommended.
3. Contractor approval to perform High Risk work for Company should be based on the contractor’s experience in relation to the type of work, together with a review of their safety record as applicable to and commensurate with the work being done.
4. Requestors may use previously approved contractors, but where none exist or where the Requestor will introduce a new contractor, the contractor company must be evaluated on their ability to perform the work safely. In evaluating a contractor’s ability to perform to acceptable safety standards, the following may be considered, dependent upon the type of High Risk work to be contracted:
 - the contractor’s ability to perform High Risk work, according to all applicable requirements,
 - the contractor’s experience in the type of High Risk work to be performed,
 - review of the contractor’s safety program, which may include the qualifications, training or experience of key workers for specific High Risk work,
 - an accident experience that is equal or better than that of the contractor’s industry group (i.e., North American Standard Industrial Classification),
 - endorsements/testimonials from other companies.
5. Some contractors, which perform work at multiple Company locations and are approved at a national or regional level to perform High Risk work for Company, do not require local evaluation and approval.
6. Where facilities maintenance, engineering, or construction management is performed by a Facilities/RESO contractor, the contractor must maintain a process to evaluate and approve their subcontractors performing High Risk work for Company.
7. In some circumstances, or due to business needs or required emergency work, limited duration approval of a contractor for a specific type of High Risk work may be necessary. If the contractor cannot be formally evaluated prior to the start of work, then the Requestor of Services may conduct an informal review. The Requestor of Services must address whether any additional monitoring/oversight is necessary to ensure applicable safety requirements are implemented.

C. Company/Contractor Interface and Communications

1. The Requestor of Services must act as or designate an Company Representative to act as interface with contractor companies. The Representative is the primary contact between the contractor and Company. The Representative may be the Requestor of Services, another Co. employee, or a representative of another contractor company. This person maybe known locally as a Technical Coordinator, Contractor Coordinator, Construction Coordinator, Project Coordinator, or Project Manager. For Moderate or High Risk work, the Company Representative must have competency commensurate with the level of risk of the contracted work to properly oversee and monitor such work.
2. The Company Representative must communicate to contractors an awareness of:
 - unique hazards associated with Company premises/activities that could affect the contracted work, including required hazardous work permits,
 - relevant Company emergency, health and safety requirements or procedures,
 - requirement to notify Company of accidents/illnesses/incidents occurring on Company property or while carrying out work for Company.
3. **Company has developed several guidance documents to address the above requirements, known as Contractor Guides. These Contractor Guides are designed to familiarize contractors, subcontractors, and their employees working at a Company facility or for Company, with important information about our safety and environmental policies. The guides are not intended to be all inclusive, but do include topics which are most frequently of concern. The guides should be considered as minimum requirements supplementing the contractor's own safety requirements and procedures. Several Company US locations have developed location specific contractor guides. Additionally, Company has developed two US contractor guides that apply to contracted work at any Company US facility or location where work is performed for Company (unless a location specific guide exists).**
4. The Company Representative must ensure that Company is informed of any potential hazards to Company employees, other contractors, or Company facilities or processes, which could be created as a result of the contracted work. The Company Representative must take appropriate actions to protect and maintain the safety of Company employees and property.

D. Monitoring / Oversight

1. Company requires contractor oversight and monitoring against contract and Company requirements as defined in the applicable contractor guide.
2. The extent of contractor oversight and monitoring will vary depending on the type of work, risk level, and contractor work experience at Company.
3. The Company Representative is responsible to provide appropriate oversight and monitoring for contracted operations, commensurate with the risks inherent in the activity (refer to the Table below). Unsatisfactory contractor safety and health performance must be promptly addressed with contractor management, and corrective actions taken. Company management and Procurement should be notified as needed.
4. If there is an imminent hazard to personnel or property, immediate corrective action must be taken, and appropriate contractor and Company management notified.
5. **The US Contractor Safety Guidance for the Company Representative and the Contractor Monitoring Checklist have been developed to assist the Company Representative with monitoring and oversight of contracted activities.**

<u>Type of Contracted Work</u>	<u>Evaluation and Approval</u>	<u>Monitoring Requirements</u>	<u>Recommended Monitoring Frequency</u>
<u>Low Risk</u>	Selection of experienced contractor companies is recommended.	- Compliance with contract and any unique Company requirements	As appropriate

<p><u>Moderate Risk</u></p>	<p>Selection of experienced contractor companies is strongly recommended</p>	<ul style="list-style-type: none"> - Compliance with contract, Company and regulatory requirements - Confirm PPE use, if required - Company Representative obtains permits/approvals as needed 	<ul style="list-style-type: none"> - As appropriate for the risk level of the work being performed and/or as necessary due to changes in the statement of work, observed safety and health performance, etc. - Use the US Contractor Monitoring Checklist or other methods as appropriate
<p><u>High Risk</u></p>	<p>Evaluation and approval is required <u>prior</u> to contracting the work</p>	<ul style="list-style-type: none"> - Compliance with contract, Company and regulatory requirements - Confirm PPE use - Company Representative obtains permits/approvals as needed 	<ul style="list-style-type: none"> - Frequent monitoring as appropriate for the risk level of the work being performed and/or as necessary due to changes in the statement of work, observed safety and health performance, etc. - Use the US Contractor Monitoring Checklist or other methods as appropriate

V. Control Points

1. Contractors performing work for Company are made aware of safety expectations.
2. Contractors hired to perform high-risk work for Company are pre-qualified.
3. Company Representative is providing appropriate oversight and monitoring for contracted work, commensurate with the risks inherent in the activity.

VI. Documentation

Medical, Health and Safety records (e.g. training, audit, accident investigation, industrial hygiene survey, self-assessment inspection) must be maintained in accordance with the [Medical, Health and Safety](#) essential code requirements of the [Worldwide Records Management \(WRM\) Plan](#). For information on hold orders at your location reference [Appendix B](#) of the WRM Plan.

1. Documents used by the Requestor of [Services](#) to evaluate the capabilities and safety performance of new contractors performing High Risk work for Company are to be maintained by the Requestor of Services and/or Procurement.

VII. Definitions

Applicable Requirements – Any applicable federal, state, county, or municipal law, regulation, ordinance, or code, or, any Company requirement, including national consensus or industry standards adopted by Company or the authority having jurisdiction.

VIII. References

BOND process web site for [US Contractor Safety](#)

IX. Revision History

A hard copy of this document is current only at time it was printed. Printed copies are for reference only. It is the responsibility of the user to obtain the current version from the Company intranet.

U.S. Common Process Owner(s): XXXXXXXX

Revision Date	Description
02/01/2005	Process Reviewed
02/25/2006	Process updated to include addition of new category called Moderate Risk contractors, revised and deleted some definitions, added Subcontractor definition, replaced Contractor Coordinator with Company Representative and further defined same, clarified Management and Company Representative roles/responsibilities, added examples of Low Risk and Moderate Risk work, clarified Contractor Communications and Monitoring and Oversight sections. A summary of the changes can be found by clicking here .
04/21/2006	Process updated to include 2 new references to the BOND process web site and the Company Representative Guidance document, and an updated Contractor Monitoring Checklist (now includes instructions for using the checklist).
09/14/2006	Scope revised, Process revised to include addition of new Company US Contractor Guide for Providers of Administrative Services, Control Points identified and Flowchart deleted.

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