

**STANDARD PRACTICE INSTRUCTION**

**DATE:** Updated July 31, 2023

**SUBJECT:** Contractor Safety Verification Program

**REGULATORY STANDARD:** OSHA - 29 CFR

**BASIS:** It is the responsibility of the host facility/company to ensure the safety of all workers conducting business on the site. When an employer arranges to have employees of another employer (Contractors) perform work that involves activities that may put personnel at risk, the host employer must inform the Contractor that the workplace contains specific hazards and that the work to be done is permitted only if all workers have the proper training, equipment and work conditions to accomplish the task(s) in a safe manner.

**GENERAL:** This employer will ensure that safe work practices are used by Contractor personnel to provide for the control of hazards during operations such as lockout/tagout, confined space entry, welding, opening process equipment or piping, and general safety within our facility. Salisbury University will ensure that, when selecting a Contractor, we obtain and evaluate information regarding the contract employer's safety performance and programs to ensure that occupational safety and health policies have been established and are being followed.

**RESPONSIBILITY:** The Environmental Safety is the "Safety Manager." The Safety Manager is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The Safety Manager will monitor the basic elements in this program, and is the sole person authorized to amend these instructions.

### **Contents of the Contractor Safety Verification Program**

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## **Salisbury University Contractor Safety Verification Program**

**1. Written Program.** This employer will review and evaluate this standard practice instruction:

- On an annual basis
- When changes occur to 29 CFR, that prompt revision of this document
- When facility operational changes occur that require a revision of this document
- When there is an accident or close-call that relates to this area of safety
- When changes occur to any related document that prompts a revision of this document.
- Anytime the procedures fail

Effective implementation of this program requires support from all levels of management. This written program will be communicated to all personnel that are affected by it. It encompasses the total workplace, regardless of the number of workers employed or the number of work shifts. It is designed to establish clear goals, and objectives.

**2. Statement of Policy.** This policy is designed to establish a screening process so that we may hire and use Contractors who accomplish the desired job tasks without compromising the safety and health of employees at this facility. The Contractor must assure that contract employees are trained on performing the job safely, of the hazards related to the job, and other applicable provisions of the OSHA Standards. This instruction describes a systematic approach that must be used to evaluate Contractor personnel used in the conduct of business at this facility. This instruction provides recommendations and guidelines for selecting Contractors.

2.1 Initiation of work. All contract employers will be informed, prior to the initiation of the Contractors' work at the site, of the applicable provisions of the facility emergency action plan and all other information as required by the relevant OSHA Standard.

**3. Contractor Prequalification Policy.** As a means to assure that contract employees follow the safety rules of the facility, including safe work practices required by relevant regulations and policies, the following criteria and information relating to the Contractor will be reviewed and complied with before any contract for work on site is approved:

3.1 Information relating to contract employers' safety performance and programs;

3.2 Methods of informing the contractor (and our personnel) of known potential hazards related to the Contractor's work and applicable provisions of the facility emergency action plan;

3.3 Safe work practices to control the entrance, presence and exit of contract employers and contract employees in covered process areas, or other areas where known hazards exist;

- 34 Evaluation of Contractor employer performance in complying with specific safety standards;
- 35 Contract employee injury and illness logs related to safety standards; and
- 36 A list of unique hazards presented by Contractors' work or potential hazards generated by the contractor in the workplace that are reported to this employer.

**4. Routine Contractor Compliance Inspections.** Routine Contractor compliance inspections will be conducted periodically when contractors are on site. The inspection will be conducted to discover conditions and work practices that do not conform to best management practices regarding Contractor safety compliance.

4.1 Inspection team composition. The facility Contractor inspection will be conducted by a qualified/competent person.

4.2 Inspection Intervals. The Project Manager will coordinate inspection dates and times. Inspections will be conducted on a regular basis while work is in progress.

4.3 Inspection report. The Safety Manager and/or Project Manager will develop a Contractor safety report listing deficient items noted during the inspection. The following items will be accomplished:

4.3.1 The report will be distributed immediately to personnel responsible for correcting deficiencies noted during the inspection.

4.3.2 The report will be distributed to all supervisors and key management personnel affected by the Contractor's operation. Supervisors will brief the results to all employees under their control. Any employee requesting to be placed on the distribution list will be accommodated.

4.3.3 For long-term projects, the Safety Manager will develop a statistical analysis of deficiencies noted to determine jobs/areas that have a high incidence of Contractor non-compliance. These areas will be emphasized during future inspections and meetings. This analysis will become a determining factor in future awards of work to the contractor.

4.3.4 Any deficiencies noted will be immediately corrected by the contractor or a "stop work" order will be issued.

**5. Contractor Safety Meetings.** A well-ordered flow of information is essential to a good Contractor Safety Verification Program. This employer, through Contractor meetings at all levels, intends to ensure that all contractors awarded work will maintain a high degree of safety compliance at all times.

5.1 Contractor meeting agendas. The Safety Manager and/or Project manager will present agenda items serving various topics of importance to the Contractor Safety Verification Program. The agendas will be flexible. They will be intended to ensure the highest degree of compliance to existing regulations.

5.2 Contractor meeting schedules. Contractor safety meetings will be conducted on a regular basis, and when operational changes to equipment, facilities, or the job occur that impact the Contractor Safety Verification Program.

5.3 Departmental staff meetings. Contractor safety topics will be included in the agenda of selected staff meetings. The Safety Manager will keep department heads informed of Contractor safety performance developments in their area. Department heads may ask the Safety Manager to provide Contractor safety briefings as required.

5.4 Supervisor meetings. Contractor safety issues will be included in the agenda of selected meetings during times when contractors are used in their departments. Department heads will ensure that selected Contractor Safety Verification Program information is transmitted to supervisors for inclusion in meetings. Supervisors may ask the Safety Manager to provide Contractor safety briefings as required.

**6. Specific Safety Standards Requiring Contractor Safety Compliance.** The following standards will be reviewed if the contractor engages in activities that could fall under the jurisdiction of the specific standard:

29 CFR 1910.119	Process Safety
29 CFR 1910.120	HAZWOPER
29 CFR 1910.134	Respiratory Protection
29 CFR 1910.146	Confined Space
29 CFR 1910.147	Lockout Tagout
29 CFR 1910.178	Powered Industrial Trucks
29 CFR 1910.252	Welding Safety
29 CFR 1926.500	Fall Protection
29 CFR 1910 & 1926 (various)	PPE
29 CFR 1926.450	Scaffolds
29 CFR 1926.1053	Portable Ladders
29 CFR 1910.1200	Hazard Communication
29 CFR 1926.650	Trenching/Excavations

**7. Contractor Training Compliance.** All Contractors will ensure that their employees are properly trained about the known fire, explosion and or toxic hazards, uncontrolled energy, confined spaces, and any other hazard related to their jobs.

7.1 Contractors used by this employer are required to provide training to their employees in the work practices necessary for their specific job. Additionally, this employer in coordination with the Contractor will conduct process hazard analyses to identify, evaluate and control processes involving highly hazardous chemicals.

7.2 Whenever there are outside Contractors present, coordination with this employer is mandated. For example, this employer will inform the contractor (and vice versa) when equipment cannot be touched, re-energized or restarted.

7.3 Based on interviews with the Contractors employer, this host employer will ensure, through periodic evaluations, that the training provided to Contractor employees by the Contractor employer is equivalent to the training required for direct hire employees. However, the burden of training Contractor employees remains with the Contractor employer.

7.4 Contractors used by this employer must:

7.4.1 Assure their employees are trained in safe work practices needed to perform the job.

7.4.2 Assure their employees are instructed in the known potential fire, explosion, or toxic release hazards related to the job and the applicable provisions of the facility emergency action plan.

7.4.3 Document the required training and the means to verify their employees have understood the training.

7.4.4 Assure their employees follow the facility safety rules and work practices.

7.4.5 Advise this employer of unique hazards presented by the Contractor's work.

**8. Contractor Safety Verification.** A standard form, Contractor Safety Verification, will be used to evaluate Contractors prior to the start of all work activities.