

### Before you begin

Determine if you have a current contractor safety policy. If you do, consider updating and reviewing it, and communicating it to your employees. If you do not, consider creating one with your safety team or employees. Think about those entering your workplace who are not employees. Are they exposing your employees, other contractors, or your customers to additional hazards? Determine if you have an audit process for outside contractors. Review the discussion for the program's key points.



### Introduction

Almost all companies use contractors. They may come to your facility for many reasons, including heating, ventilation, electrical or air conditioning problems, and many other work assignments. Because they are not on your employee payroll or being directly managed by your organization, there is a potential for serious injury to themselves or your employees or severe property damage. It is crucial to determine who could expose your employees to injuries then create a process to minimize the hazards.

### Definitions

**Contractor** – A person or company that undertakes a contract to provide materials or labor to perform a service or do a job. For the purpose of this safety talk, a contractor is not on the employer's payroll or not directly supervised by the employer.

**At-Risk Behavior** – Any behavior, activity, or act that has inherent risk. It is a behavior, activity, or act that, if repeated with enough frequency will result in an accident or injury to yourself or to someone else. In a nutshell, an at-risk behavior is a short-cut.

## Discussion

Companies often bring outside contractors in to do dangerous or non-routine jobs. If a serious injury results from this work, companies can face inspections, citations, and lawsuits. Some companies review and prequalify contractors before allowing them to enter their workplace.

Once on site you should have a meeting with contractors prior to their starting the work. In addition, you should conduct audits during the contractor work operations. If you see unsafe behaviors, follow your company policies or procedures in confronting the contractor's employees and correct the behavior or remove them from the premises. The type of at-risk behavior observed will dictate the type and urgency of response. Also, alert the contractor's supervision of at-risk behaviors. These tools help keep all employees safe.

## Process steps

The first step is to take an inventory of the services and companies your employer uses. The second step is to create a policy and a program. Third, you implement the program and train your employees. Finally, evaluate the program, at least annually, and make any needed changes. Create this process using a safety committee or employee input. Involve personnel responsible for purchasing because they can be a gatekeeper for part of this process.

You must have a contractor portion included in the Hazard Communication written program 1910.1200 (e). (See the reference section below for other Occupational Safety and Health Administration (OSHA) standards that include a contractor component.) However, an all-inclusive written contractor program is not an OSHA requirement for most employers. But, it is a best practice that can help you properly manage contractors.

When creating or updating your contractor-safety program, there are topics you should include. They are:

### **Prequalification**

- Including liability insurance and workers' compensation

### **Responsibilities**

- List roles and who is involved

### **Emergency procedures**

- Communicating the emergency action plan to the contractor that includes your interior shelter locations, alarm meanings and outside assembly locations

### **Training requirements**

- Identify the type of training contractors must have before and while on-site

### **Housekeeping**

- Expectations on proper housekeeping, waste management and storage of materials
- Restrooms, smoking, phone use, and other general safety concerns
- Personal protective equipment

### **Fire prevention**

- Expectations and specific policies related to task being performed like welding and flammable storage

### **Reporting an incident**

- Timeline, who and how to report incidents

### **Hazard communication standard requirements**

- Including informing your employee's about chemicals brought into the facility
- A company-equipment usage policy
- Enforcement and company safety rules

You may include other relevant topics. These rules and topics may be centrally located in a Contractor Safety Handbook and you may refer to them in your policy.

## Group activities

As a group, make a list of the types of outside contractor services your company uses. In addition, identify which companies/contractors you regularly have at your facility. Once this list is complete, consider prequalifying contractors before you permit them in your facility.

Ask employees the types of safety rules contractors must follow. Discuss with employees how they can participate in the contractor-safety process. This includes being involved in audits, reporting unsafe behaviors, or aiding in the prequalification process.

## Summary

Once you create the contractor-safety program, review the requirements and procedures with your employees. Do this at least annually.

If you involve employees in creating the program and its policies, they are more likely to recognize, approach, and ensure contractors are working safely.

## References

Communication and Coordination for Host Employers, Contractors, and Staffing Agencies

<https://www.osha.gov/shpguidelines/communication.html>

Campbell Institute – Best Practices in Contractor Management

<https://www.nsc.org/Portals/0/Documents/CampbellInstituteandAwardDocuments/WP-BestPractices-Contractor-Mgmt.pdf>

## Standards

OSHA standards that reference contractor safety requirements:

[OSHA 29 CFR 1910.38,](#)

[OSHA 29 CFR 1910.1200,](#)

[OSHA 29 CFR 1910.147,](#)

[OSHA 29 CFR 1910.119,](#)

OSHA 29 CFR 1926.98