

**Contractor/Subcontractor Safety Policy**  
**For**  
**Lawrence Building Corporation**  
November 2, 2017

**Purpose**

This document is provided to ensure all safety plans, policies and procedures are communicated to all participating contractors on projects for which we serve as the head contractor. It also provides an avenue for subcontractors to communicate their safety plans, policies and procedures to us as the head contractor. This program aims to prevent personal injuries and illnesses.

**Explanation of Responsibilities**

*General Contractor Responsibilities*

This company has specific safety responsibilities when hiring subcontractors. Company responsibilities when hiring contractors include the following listed steps. The company will:

1. Take steps to protect contract workers who perform work on or near a potentially hazardous process.
2. Obtain and evaluate information regarding the contract employer's safety performance and programs.
3. Inform the contractor of known potential fire, explosion, or toxic release hazards related to the contractor's work and the process.
4. Explain the applicable provisions of the emergency action plan to the contractor, and require that the contractor disperse that information to all workers who will work at this site.
5. Develop and implement safe work practice procedures to control subcontractor employee entry into hazardous work areas in which they are not performing work.
6. Maintain a subcontractor employee injury and illness log.
7. Periodically evaluate the contract employers' fulfillment of his or her responsibilities under this policy.
8. Hire and use only contractors who meet Contractor Selection Criteria as listed in the next section of this policy.

*Subcontractor Responsibilities*

Considering that subcontractors often perform very specialized and potentially hazardous tasks, their work must be controlled. Subcontractor responsibilities when accepting contracts with this company include the following listed steps. The subcontract employer will:

1. Assure that all subcontractor employees are trained in the work practices necessary to safely perform their respective job;
2. Instruct all subcontractor employees in the potential fire, explosion, or toxic release hazards related to his or her job and the process;
3. Assure that all subcontractor employees know the applicable provisions of the emergency action plan;
4. Document all subcontractor employees training;
5. Inform all subcontractor employees of and then enforce safety rules of the work site.
6. Require that all subcontractors abide by the same rules to which the contractor is bound by this section;
7. Abide by the work site smoking rules. Smoking is prohibited in certain areas of some work sites. Therefore, permission must be requested before subcontractor's employees are allowed to smoke in any area.

## **Guidelines for Subcontractor Selection**

The following listed steps are the standard procedures for evaluating and choosing subcontractors who will work on any work site for which this company is head contractor.

1. Obtain and evaluate information regarding a subcontractor employer's safety performance and programs when selecting a subcontractor to perform any type of work that might bring them into contact with any hazardous chemical or process on the premises of the work site.

To determine that past safety performance, the group or individual selecting the head contractor should consider the subcontractor's:

- Employee injury records such as Experience Modification Rate (EMR or MOD) for workers' compensation for the past three years and the contractor's past safety record in performing jobs of a similar nature.
- OSHA log, which includes the injury and illness rates (number of lost time accident cases, number of recordable cases, number of restricted workday cases, number of fatalities) for the past three years.
- Incidence rates for lost-time accidents and recordables for the past three years.
- Written safety program and training system.

For subcontractors whose safety performance on the job is not known, obtain information on injury and illness rates and experience and obtain subcontractor references.

2. Subcontractor work methods and experience should be evaluated. Ensure that for the job in question the subcontractor and its employees have the appropriate:

- Job skills,
- Equipment,
- Knowledge, experience, expertise, and
- Any permits, licenses, certifications, or skilled trades' people necessary to be capable of performing the work in question.

3. The subcontractor must be willing and able to provide a current certificate of insurance for workers' compensation and general liability coverage with the contracting company.

4. Each subcontractor must be responsible for ensuring that its employees comply with all applicable local, state, and federal safety requirements, as well as with any safety rules and regulations set forth by this company, for which it is performing the contracted work.

Possible ways to determine past compliance with such safety regulations are:

- To request copies of any citations for violations occurring within the last three years, to determine the frequency and type of safety laws violated.
- To have all bidders on jobs describe in detail in writing any safety programs in place at the contractor, infractions, accidents, and workers' compensation claims within the last three years. This information will provide the company with a solid background on that contractor's safety performance and adherence to safety rules and regulations.

## **Guidelines for Contracts**

Contracts that are entered into by this company as head contractor must contain safety provisions and information on the following topics, as applicable for the job and or work site being contracted:

- The Hazard Communication programs and hazardous chemicals being used by the subcontractor;
- Necessary and expected personal protective equipment (PPE) for the job or work site in question;
- The set of general safety rules to be followed at the work site;
- Designation of at least one safety person or representative from the head contractor and the subcontractor;

- Designation of financial responsibility for OSHA fines to whichever contractor created the hazard cited, even if other employers' employees were the ones exposed and other employers were the ones cited.

### **Explanation of the Penalty System for Noncompliance with Safety Rules**

Upon violation of any company safety rule, the violating employer will be penalized. The list of possible disciplinary actions include:

- Verbal reprimand - An informal discussion of the incorrect behavior that should take place as soon as possible after the contractor has knowledge of the safety misconduct.
- Written reprimand - A written form documenting the safety misconduct, to be presented to the employer and placed in the employer's personnel file.
- Monetary penalty – A monetary penalty assessed against the violating employer.
- Dismissal/termination of contract - The permanent separation of an employee from the company, initiated for disciplinary reasons, safety misconduct.

The severity of the penalty will be in direct correlation to the severity of the safety violation. Injury or damage is not a necessary constituent to warrant disciplinary action. It is the violation of the rule itself and not necessarily its end result that is the subject of the discipline.

### **Guidelines for Information Exchange**

#### *General Contractors Guidelines for Information Exchange*

Before the contract work begins, the subcontractor must:

1. Designate a representative to coordinate all safety and health issues and communicate with subcontractors' designated representative.
2. Provide documentation of any necessary safety training, as described in the Training Requirements section of this policy, to this company's designated representative.
3. Provide information to the designated representative on the safety and health hazards that may arise during the course of the contractor's work and the means necessary to avoid danger from those hazards, including Hazard Communication and all other potential hazards.
4. Obtain from this company any safety rules and regulations in effect at the site or potential hazards present that may affect the contractor's work.
5. Be certain to be informed of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be certain to have the telephone numbers of the nearest hospital, ambulance service, and fire department.
6. Advise and train its employees on hazards associated with the work to be performed, including any Hazard Communication or other hazard information provided the contractor by this company's designated representative.
7. Keep the designated representative of this company fully informed of any work that may affect the safety of this company's employees or property. This includes complying with the state and federal right-to-know legislation and providing the designated representative appropriate material safety data sheets (MSDSs) or other required information about chemicals the contractor will bring onto the site.
8. Know who to call and what to do in emergencies, including where first aid and medical services are located and train employees on this.

During the contract work, the subcontractor will:

1. Have a designated site safety coordinator present and attentive to the work being carried out at all times that any employee is working at the site.
2. Make sure that any equipment, chemicals, or procedures used by the contractor to perform contracted work meet all OSHA requirements.
3. Be held responsible and accountable for any losses or damages suffered by this company and/or its

employees as a result of contractor negligence.

4. Provide its employees with medical care and first aid treatment.
5. Ensure that each contractor employee is issued and wears some form of easily seen identification.
6. Provide supervisors and employees who are competent and adequately trained, including training in all health and safety aspects of the work involved in the contract.
7. Provide all tools and equipment for the work, including personal protective equipment (PPE), and ensure the equipment is in proper working order and employees are instructed in its proper use.
8. Maintain good housekeeping at the work site.
9. Follow specific instructions supplied by this company should emergency alarms be activated.
10. Notify the designated representative immediately of any OSHA recordable injury or illness to contractor employees or subcontractor employees occurring while on the site of this company. Provide a copy of each accident report to the designated representative.
11. Receive and use a copy of the head contractor's written safety policies and procedures.

After conclusion of the contract work, the contractor is responsible for cleaning all work areas and disposing of any discarded materials in a proper and legal manner.

#### *General Contractor Guidelines for Information Exchange*

Before contract work begins, this company must:

1. Designate a representative to coordinate and communicate all safety and health issues and communicate with the subcontractor. The designated representative will have a copy of the work document, be thoroughly familiar with its contents, and with the safety and health aspects of the work, or know whom to call to obtain this information. The designated representative is responsible for ensuring that all company responsibilities listed below are carried out.
2. Provide a copy of the work site's written safety policies and procedures to the subcontractor.
3. Inform the subcontractor of any emergency signals and procedures that may be put into operation in areas where the subcontractor's employees are working. The subcontractor should be given the telephone numbers of the nearest hospital, ambulance service, and fire department.
4. Conduct an inspection of the proposed work site area before the pre-start up meeting so any known information about on-site hazards, particularly non-obvious hazards, are documented and thoroughly communicated to the subcontractor.
5. Work directly with the subcontractor's designated representative, with whom all contacts should be made.
6. Conduct a pre-start up meeting (walk through) with the subcontractor's designated representative and a supervisor from each of the areas of the work site involved in the subcontractor's work.
7. Review all contract requirements related to safety and health with the contractor's designated representative, including, but not limited to, rules and procedures, personal protective equipment (PPE), and special work permits or specialized work procedures. Advise the subcontractor that the work site safety and health policies must be followed. A copy of the work site's safety plans must be furnished to the subcontractor.
8. Inform the subcontractor's designated representative of the required response to employee alarms and furnish the subcontractor with a demonstration or explanation of the alarms.
9. Communicate thoroughly with the subcontractor's designated representative any safety and health hazards (particularly non-obvious hazards and hazard communication issues) known to be associated with the work, including those in areas adjacent to the work site. Tell them it is the subcontractor's responsibility to convey this information to its employees.
10. Review preparation of work site before the subcontractor begins initial work.
11. Identify connect-points for all services, such as steam, gas, water, electricity, etc. Define any limitations of use of such services.
12. Ensure that all affected employees at the work site receive training on all hazards to which they will be introduced by other subcontractors.

During the contract work, this company must:

1. Limit, as necessary, the entry of other contractors' employees into hazardous subcontractor work areas.
2. Monitor the subcontractor's compliance with the contract throughout the duration of the work. When checking subcontractor work during the project, note any negligent or unlawful act or condition in violation of safety standards or requirements. Any items noted should be brought immediately to the attention of the subcontractor's designated representative in writing, with a copy of the notice being sent to the subcontractor's home office concurrently. However, if an unsafe act or a condition is noted that creates an imminent danger of serious injury, immediate steps should be taken with the subcontractor's designated representative, or in his or her absence, the subcontractor's employees to stop the unsafe act or condition. Do not allow work that is in violation of a regulation to continue.
3. Document all discussions, including place, time, and names of subcontractor employees in attendance.
4. Approve the subcontractor beginning work each day, unless it is routine service or maintenance work or periodic outdoor service or maintenance work.
5. For work for which this company has developed specific and generally applicable procedures, make sure subcontractors follow the same procedures.
6. Do not allow loaning of tools and equipment to subcontractors. The subcontractor is required to provide the necessary tools and equipment.
7. Contact the nearest medical facilities, when available, in emergency situations where severity of the injury dictates immediate attention.
8. Obtain a copy of each OSHA recordable injury report from the subcontractor. Investigate and report to the facility manager all personal injuries to subcontractor employees. Investigate and report any property losses. Maintain a subcontractor accident report file.

After conclusion of the contract work, complete a post-project assessment of the subcontractor's safety performance for the site manager to be used for future reference, with a recommendation on whether or not to re-hire the subcontractor.

### **Training Requirements**

Subcontractor Requirements - The subcontractor must:

1. Train all workers on all safety and health hazards and provisions applicable to the type of work being done, and provide documentation of such training to this company's designated representative.
2. Train employees on where to obtain first aid and medical services.

General Contractor Requirements - This Company as lead contractor must:

1. Ensure that affected company employees receive training on all hazards to which they will be introduced by a subcontractor.
2. Emphasize to the subcontractor that it is the subcontractor's responsibility to convey to its employees any safety information provided by the company to the subcontractor.

### **Recordkeeping Requirements**

*Subcontractor*

1. Keep records of all training done with subcontractor workers and all documentation provided to the head contracting company regarding such training.
2. Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.
3. Have on file the telephone numbers of the nearest hospital, ambulance service, and fire department.

4. Have copies on-site of all material safety data sheets (MSDSs) or other required information about chemicals relevant to the work on-site.
5. Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.

*General Contractor - The designated representative will:*

1. Have a copy of the contract on file and be thoroughly familiar with its contents, and with the safety and health aspects of the work.
2. Keep records of all training done with company workers regarding hazards to be caused by the subcontracting company.
3. Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.
4. Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.
5. Keep a daily log regarding pre-work start-up inspection findings.
6. Keep records of all documentation of any sort given to you by the contractor, including records of training done MSDSs, accident reports, etc.
7. Keep records of all documentation of any sort you give to the contractor, including list of hazards to train their employees on, MSDSs, etc.
8. Document all discussions, letters, memos, or other communications made to the contractor regarding safety issues, including place, time, names of people involved.

**Employee Handout Sheet**  
**Contractor & Subcontractor Safety Policy**

This company has established a Contractor/Subcontractor Safety Policy to ensure maximum safety communication and performance both by subcontract workers and company workers during the course of contract work at our company.

The contractor safety policy establishes guidelines to be followed whenever contractors work as subcontractors at our work sites. The rules have been established to:

- ✓ Provide a safe working environment,
- ✓ Govern head contractor relationships with contractors, and
- ✓ Ensure that subcontractor employees and our employees at the work site are trained to protect themselves from all potential and existing hazards.

All employees will be informed by their supervisors of the information and/or parts of the contractor safety policy necessary for them to conduct themselves and perform their jobs in a safe manner during contract work. The effectiveness of the contractor safety policy depends upon the active support and involvement of all employees. It is intended to serve as an additional tool in safeguarding the health and safety of employees.

All supervisors and managers will have a complete copy of the contractor safety policy, and can be consulted for information an employee may request.

**Contractor/Subcontractor Safety Policy  
Employee Sign-Off Sheet**

Our Company has been given a copy of the Contractor/Subcontractor Safety Policy, We have read and understand it, and we accept the policy as a working document that we will support in our daily work with Lawrence Building Corporation.

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Company Name

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Corporate Officer Signature

Date

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Safety Managers Signature

Date