

**LP 4.24**

Effective:
5/6/2025

Revised:

Policy Owner:
Board of Trustees

Policy Administrator:
VP for Finance and
Administration

Affected Parties:
Employees

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Contractor Safety

References: OSH Act, Section 5(a)(1)

1 Purpose

- 1.1 This policy establishes a program to ensure a safe and healthful working environment and to act as a performance standard for both Lander University employees and contract employees.
- 1.2 This policy is designed to help reduce university employees' occupational exposure to the hazards of, with, or near contractors working at Lander University.
- 1.3 A written contract employee safety policy establishes guidelines to be followed by persons working at Lander University, including guidelines to:
 - 1.3.1 Provide a safe working environment for all persons working on the university campus.
 - 1.3.2 Govern university relationships with external contractors.
 - 1.3.3 Ensure that contract employees and university employees are trained to protect themselves from all potential and existing hazards.

2 Scope

- 2.1 This policy establishes guidelines to be followed by contractors whose employees are working at the university.
- 2.2 The rules established include:
 - 2.2.1 Provision of a safe working environment.
 - 2.2.2 Ensuring that contractor employees and university employees are trained to protect themselves from all potential and existing hazards.

- 2.3 The effectiveness of this contractor safety program depends upon the active support and involvement of all employees.
- 2.4 This policy is intended to ensure that all contractor work practices are carried out safely to minimize the possibility of injury or harm to the contractor's employees or university employees.
- 2.5 This policy is intended to serve as an additional tool in safeguarding the health and safety of all employees.
- 2.6 This policy establishes uniform requirements designed to ensure that contractor safety orientation, coordination, and administration practices are communicated to and understood by employees.
- 2.7 This document is provided to ensure that all university safety policies and procedures are communicated to all participating contractors, and it provides an avenue by which contractors can communicate their safety plans, policies, and procedures to the university.

3 Responsibilities

3.1 Safety and Regulatory Compliance Officer

- 3.1.1 The Safety and Regulatory Compliance Officer has the overall responsibility for administering and maintaining the Contractor Safety Policy.

3.2 Managers and Supervisors

Managers and Supervisors are responsible for:

- 3.2.1 Ensuring that the safety program is supported and enforced in their areas.
- 3.2.2 Obtaining and evaluating information regarding the contract employer's safety performance and programs.
- 3.2.3 Informing the contractor of known hazards related to the contractor's work and the work environment.
- 3.2.4 Explaining the applicable provisions of the Emergency Action Plan to the contractor and requiring that the contractor disperse that information to all of the contractor's employees who will work at the site.
- 3.2.5 Working with the contractor to verify safe work practice procedures are in place to ensure the safe entry of the contractor's employees into hazardous work areas.

3.2.6 Periodically evaluating the contractor's fulfillment of their responsibilities under this policy.

3.2.7 Hiring and using only those contractors who meet the contractor selection criteria listed in Section 3.3 of this policy.

3.3 Contractors

3.3.1 The contractor's employees must perform their work safely.

3.3.2 Considering that contractors often perform highly specialized and potentially hazardous tasks (e.g., non-routine repair activities), their work must be monitored and performed in a safe and controlled manner, prioritizing safety and proper practice over speed

3.3.3 In addition, the contractor will:

3.3.3.1 Ensure that their employees are trained on the work practices necessary to safely perform their job.

3.3.3.2 Ensure that their employees know the applicable provisions of the Emergency Action Plan.

3.3.3.3 Document their employees' training.

3.3.3.4 Inform their employees of the safety rules of the university and then ensure that their employees follow those rules, particularly those rules implemented to minimize the hazards of the contracted process.

3.3.3.5 Require that all subcontractors abide by the same rules which the contractor must follow.

3.3.3.6 Abide by the university's smoking rules.

3.3.3.7 Provide Lander University with a copy of applicable safety policies, procedures, and safety training records.

4 Policy Requirements

4.1 Contractor Selection

- 4.1.1 Lander University will obtain and evaluate information regarding a contractor's safety performance and programs when selecting a contractor to perform any type of contract work that might bring them into contact with any hazardous chemical or process on university property.
- 4.1.2 To determine past safety performance, Lander University must consider the contractor's:
 - 4.1.2.1 Employee injury records (e.g., 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.
 - 4.1.2.2 Incidence rates for lost-time accidents and recordables for the past three years.
 - 4.1.2.3 OSHA log, which includes the injury and illness rates (i.e., number of lost-time accident cases, of recordable cases, of restricted workday cases, of fatalities) for the past three years.
 - 4.1.2.4 Written safety program and applicable safety training records.
- 4.1.3 For contractors whose safety performance on the job is not known, obtain information on injury and illness rates and experience and obtain contractor references.
- 4.1.4 Contractor work methods and experience for the job the contractor is performing should be evaluated, including:
 - 4.1.4.1 Job skills.
 - 4.1.4.2 Equipment.
 - 4.1.4.3 Knowledge, experience, and expertise.
 - 4.1.4.4 Any permits, licenses, certifications, or skilled tradespeople necessary to perform the work the contractor is performing.
- 4.1.5 The contractor must be willing and able to provide a current certificate of insurance for Workers' Compensation and general liability coverage for the contracting company.
- 4.1.6 Each contractor must be responsible for ensuring that their employees comply with all applicable local, state, and federal safety requirements (including OSHA requirements), as well as with any safety rules and regulations set forth by the university.

4.2 Procedures

4.2.1 Before contract work begins, Lander University will:

- 4.2.1.1 Designate a representative (usually the Safety and Regulatory Compliance Officer) to coordinate and communicate all safety and health issues and communicate with the contractor.
- 4.2.1.2 Inform the contractor of any emergency protocols and procedures that may be put into operation in areas in which the contractor's employees are working.
- 4.2.1.3 Conduct an inspection of the proposed worksite area before the pre-start-up meeting to ensure that any known information about on-site hazards, particularly nonobvious hazards, is documented and thoroughly communicated to the contractor.
- 4.2.1.4 Work directly with the contractor's designated representative, with whom all contacts should be made.
- 4.2.1.5 Conduct a pre-start-up meeting (walk-through) with the contractor's designated representative and a supervisor from each of the areas involved in the contractor's work.
- 4.2.1.6 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.
- 4.2.1.7 Inform the contractor's designated representative of the required response to employee alarms and furnish the contractor with a demonstration or explanation of the alarms.
- 4.2.1.8 Communicate thoroughly any safety and health hazards (particularly non-obvious hazards and hazard communication issues) known to be associated with the contractor's intended work to the contractor's designated representative, including potential hazards in areas adjacent to the worksite.
- 4.2.1.9 Review preparation of the worksite before the contractor begins initial work.

4.2.2 During the contract work, Lander University will:

- 4.2.2.1 Limit, as necessary, the entry of university employees into contractor work areas.

- 4.2.2.2 Monitor the contractor's compliance with the contract throughout the duration of the work.
- 4.2.2.3 When checking contractor work during the project, note any negligent or unlawful acts or conditions that are in violation of safety standards or requirements.
 - 4.2.2.3.1 If an unsafe act or a condition is noted that creates an imminent danger of serious injury, then immediate steps should be taken with the contractor's designated representative, or in their absence, the contractor's employees to stop the unsafe act or condition.
 - 4.2.2.3.2 Do not allow work that creates an imminent danger of serious injury to continue.
- 4.2.2.4 Document all discussions, including the place, time, and names of contractor employees in attendance.
- 4.2.2.5 Approve the contractor's beginning work each day, unless it is routine service or maintenance work or periodic outdoor service or maintenance work.
- 4.2.2.6 For work for which the university has developed specific and generally applicable procedures, ensure that contractors and their subcontractors follow the same procedures or their own procedures, if their procedures contain the same or greater protection for their employees.
- 4.2.2.7 Prohibit the loaning of tools and equipment to outside contractors and their subcontractors. The contractor must provide the necessary tools and equipment.
- 4.2.2.8 Contact the nearest medical facilities, when available, in emergency situations where the severity of the injury dictates immediate attention.
- 4.2.2.9 Obtain a copy of each OSHA recordable injury report from the contractor and subcontractor.
 - 4.2.2.9.1 Investigate and report to the Safety and Regulatory Compliance Officer all personnel injuries to contractor and subcontractor employees.
- 4.2.3 Before the contract work begins, the contractor must:

- 4.2.3.1 Designate a representative to coordinate all safety and health issues and communicate with the Safety and Regulatory Compliance Officer.
- 4.2.3.2 Provide information to Lander University on the safety and health hazards that may arise during the contractor's work at the university and the means necessary to avoid danger from those hazards, including hazard communication and all other potential hazards.
- 4.2.3.3 Ensure that Lander University is informed of any emergency protocols and procedures that may be put into operation in areas where the contractor's employees are working.
 - 4.2.3.3.1 Have the telephone numbers of the nearest hospital, ambulance service, and fire department.
- 4.2.3.4 Advise and train their employees on hazards associated with the work to be performed, including any hazard communication or other hazard information provided to the contractor by Lander University.
- 4.2.3.5 Keep Lander University fully informed of any work that may affect the safety of Lander University's employees or property.
- 4.2.3.6 Comply with the state and federal right-to-know legislation and provide the Safety and Regulatory Compliance Officer with appropriate safety data sheets (SDSs) or other required information about chemicals the contractor will bring onto the site.
- 4.2.3.7 Know whom to call and actions to take in emergencies, including the location of first aid and medical services, and train employees on these matters.
- 4.2.4 During the contract work, the contractor will:
 - 4.2.4.1 Ensure that any equipment, chemicals, or procedures used by the contractor to perform contracted work meet all OSHA requirements.
 - 4.2.4.2 Provide their employees with medical care and first aid treatment.
 - 4.2.4.3 Maintain good housekeeping in the workplace.
 - 4.2.4.4 Follow the specific instructions supplied by Lander University in the event that emergency alarms are activated.

- 4.2.4.5 Notify the Safety and Regulatory Compliance Officer immediately of the occurrence of any injury to or illness of their employees or any subcontractor's employees while on the site at Lander University.
- 4.2.4.6 Provide a copy of each accident report to the Safety and Regulatory Compliance Officer.

5 Policy Revision History

- First draft of policy submitted by Finance and Administration on 3/13/2025.
- Review by Policy Coordinator on 4/10/2025.
- Final review by Finance and Administration on 4/11/2025.
- Reviewed by Board of Trustees Policy Committee on 4/19/2025.
- Revised and updated by Finance and Administration on 4/23/2025.
- Submitted for full board review by Policy Coordinator on 4/23/2025.
- Approved by Lander University Board of Trustees on 5/6/2025.