Contractor Safety in the Challenge/VPP World

Speakers:
Ed Parsons, Outreach Program Coordinator
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Course Objectives

• At the completion of this session the attendees will be able to:
  – describe the minimum requirements for a contractor oversight program in the OSHA Challenge and VPP.
  – define “contractor” under the OSHA Challenge and VPP.
  – discuss the common issues in developing a contractor oversight program.
Contractor: Definitions

- Contractor. A person performing work at a facility that is “under contract” and the individual employees are not paid by the host site.
- Not an employee or a visitor.
**Contractor: Definitions**

- **Resident Contractor.** A company that provides ongoing, onsite services to a Challenge/VPP applicant/participant.

- **Applicable Contractor.** A contractor whose employees worked at least 1,000 hours for a VPP participant in any calendar quarter within the last 12 months and are not directly supervised by the participant.
  - Hours and OSHA 300 log data must be submitted on the Annual Self Evaluation to OSHA.
Contractor: Definitions

• Basically this means ALL contractors, whether regularly involved in routine site operations or engaged in temporary projects are part of the process...!
Contractor: Definitions

- Contractor
- Service Provider
- Vendor
- Temporary

New OSHA Directive!
Contractor Written Programs

• Selection Process
  – Safety & Health Criteria
  – Who will review and “approve”
  – Exemption process
  – Removal (Discipline)
    • Individual Contractor Employee
    • Contractor Company
  – Review or Renewal
Contractor Written Programs

- Equal safety and health protection
- Training
  - Compliance
  - Performance
  - Site-specific
  - “Cover all the bases”
- Require contractors’ adherence to site safety and health rules.
- Assessment and correction of Hazards in contractor work areas
Contractor Written Programs

• Management of safety via a comprehensive system including Audits and Feedback
• Mentoring of contractors to develop and improve their own safety and health management systems
Contractor Programs: Nuts and Bolts

• Typical Contractor-side problems seen from an Administrator point of view:
  – “That doesn’t apply to us”
  – “That’s what they told us to do”
  – “But it’s an Emergency”
  – “We have that – but it’s at the main office”
  – “But we copied it from the OSHA web site”
Contractor Programs: Nuts and Bolts

• Typical Owner-side problems seen from an Administrator point of view:
  – “We can’t do that because (insert reason here)”
    • Limited Resources
    • Time constraints
    • Co-employment
    • Liability
Emergency Response

Locate nearest evacuation route but What Else?
Advice to new Participants on Contractor Management

• Managing contractors must be a priority of all organizations within your worksite-TEAMWORK!
• You must have a visible presence to ensure contractor safety!
• Many contractors want to help you achieve VPP and some have very good suggestions.
• Develop a contractor management policy and audit schedule and then STICK TO IT.
Contractor Management from a Site’s Viewpoint

Dennis Blowers, CSP
Safety & Health Management Systems Lead
LANXESS Corporation
How did we get here today?

• Contractor Safety at the beginning of the OSHA Challenge Program
• Changes that we have made to our contractor safety program
• How the changes are working out
• What we have left to do
Questions?

Thank You!
Contact Information

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