



# **Contractor Safety in the Challenge/VPP World**

Speakers:

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# Course Objectives

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- 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”.
  - 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

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

# Contractor: Definitions

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- Contractor
- Service Provider
- Vendor
- Temporary

New OSHA Directive!

# Contractor Written Programs

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- 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

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- 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

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- 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

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- 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

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- 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.**



**Questions?**

Thank You!

# Contact Information

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