



CONTRACTOR SAFETY PROGRAM

1. PURPOSE AND APPLICABILITY

- 1.1 This program provides procedures for managing contractor safety. The purpose is to ensure the safety of students, faculty, staff and guests and protection of the environment during activities performed by contractors, subcontractors and vendors engaged by the following University departments or divisions:
- Risk Management and Safety Department (RMS),
 - St. Michael's Laundry Department (SML),
 - Facilities Design and Operations Division (FDO).
- 1.2 Objectives of this program include:
- Ensure those departments and divisions listed in Section 1.1 obtain contract companies who have good safety performance.
 - Provide contractors and subcontractors an overview of the University's environmental, health and safety (EHS) requirements and expectations.
 - Require and verify that contractors and subcontractors comply with all applicable safety and environmental regulatory requirements.
- 1.3 This program applies to all contractors performing work for areas managed and overseen by those departments and/or divisions listed in Section 1.1.
- 1.4 This program *does not* apply to contractors working under the following conditions:
- A project implemented by a Construction Manager, General Contractor or the Planning Design & Construction Department of the Facilities Design and Operations (FDO) Division where said party has assumed EHS responsibility under a site-specific safety program.
- 1.5 Contractors working under conditions noted in Section 1.4 shall adhere to requirements established in the respective site-specific safety program.



2. DEFINITIONS

- 2.1 **Applicable Contractor** - A contractor whose employees worked at least 1,000 hours on site for the University in any calendar quarter within the last 12 months, and are not directly supervised by the University.
- 2.2 **Conditional Variance** - A limited release for a contractor to continue for the University based on their OSHA recordable safety information. Such variances shall identify any stipulated conditions, be time bound and are subject to revocation.
- 2.3 **Contractor** – Person or entity hired to provide materials and labor to perform a service. This includes but is not limited to contractors, subcontractors, resident contractors (Maintenance shops and trades), and vendors.
- 2.4 **Contractor Representative** – Person(s) authorized by the contracting company to oversee and supervise personnel, or make decisions related to goods and services provided to the University.
- 2.5 **Contractor Safety Orientation** – A review of the University of Notre Dame's safety standards and specific safety requirements for the contracted work involving all contractor employees.
- 2.6 **High Risk Work** – As defined in the Contractor Risk Matrix (see Appendix C).
- 2.7 **Low Risk Work** – As defined in the Contractor Risk Matrix (see Appendix C).
- 2.8 **Periodic Audits (of contractor jobsites)** – Documented audits of a contractor's jobsite conducted by the University Representative or his/her designee. Periodic is defined as a varying interval and may vary based on a contractor's scope of work and associated hazards.
- 2.9 **Qualification** – Process of gathering and reviewing various requirements such as a contractor's historical safety performance and safety programs to ensure it meets University



qualification criteria.

- 2.10 **Site Specific Safety Program (SSSP)** – A program developed, administered, and monitored by a project general contractor or construction manager who is responsible for EHS of the project. The project shall have an overarching EHS plan. This is required on all construction projects that have a delineated area (e.g., fenced in) where the contractor maintains control over all operational activities. The project specific safety program shall meet all applicable regulatory requirements (OSHA, IDEM, EPA, etc.) and shall be no less stringent than the University's EHS procedures.
- 2.11 **University Representative** – The University representative is anyone who is responsible for requesting, directing or monitoring contractor work. This can be a project coordinator, a business manager, a staff member, a faculty member, etc.
- 2.12 **Vendor** – Person or company who sells goods or services. For the purposes of this program, the definition only applies to those vendors that install or perform maintenance on equipment, systems or materials.

3. RESPONSIBILITIES

- 3.1 Risk Management and Safety (RMS) shall:
- Review and maintain this program commensurate with local, state and federal regulatory requirements.
 - Conduct periodic program audits.
 - Provide guidance on procedural elements for University representatives as needed or upon request.
- 3.2 Departments and Divisions listed in Section 1.1 shall:
- Follow the requirements of this program.
 - Utilize, engage and contract only with contractors and vendors that have been approved through the contractor/vendor approval process and that have executed the University's Insurance Requirements and Indemnity Agreement (IRIA).
 - Review contractor worksite(s) for potential hazards



specific to the project scope and the work to be performed by the Contractor (see Section 6 for requirements for reviews).

- Ensure that identified hazards associated with a contractor's work scope have been addressed as soon as possible.
- Communicate specific or unique site or project hazards to the contractor(s).
- Perform periodic audits of the Contractor's EHS compliance while conducting work at the University utilizing the Periodic Job Site Safety Inspection form (see Appendix B).
- Collect injury and illness information as well as hours worked from Applicable Contractors (see definition) that account solely for work performed on campus on an annual basis.

3.3 Contractors shall:

- Adhere to all federal, state and local EHS regulations, as well as requirements set forth in this procedure. Continued failure to perform work in compliance with regulations and standards may result in the contractor being disqualified and removed from the approved contractor list.
- Immediately inform University representatives of any unexpected safety hazards or suspected hazardous materials (asbestos, lead, etc.) uncovered during the course of the contractor's work.
- Adhere to the University's emergency and other safety protocols.
- Correct any deficiencies or non-compliant conditions as soon as possible.
- Immediately notify the University representative if a significant incident occurs.

3.4 Applicable Contractors shall:

- Adhere to all requirements in Section 3.3.
- Provide the University with injury and illness information on an annual basis.
- Provide the University OSHA's Form 300A specific to the work performed at the University on an annual basis.



4. CONTRACTOR QUALIFICATION REQUIREMENTS

- 4.1 All contractors that perform work must meet the guidelines outlined in this section of the program before any work may commence on University premises.
- Qualification requirements are applicable to **High Risk** contractors.
 - Contractors classified as **Low Risk** are exempt from requirements in this section.
- 4.2 Qualification requirements for **High Risk** contractors shall include at a minimum the following:
- EMR
 - TRIR
 - DART
 - OSHA Form 300
 - OSHA Form 300A (*Applicable Contractors only*)
 - Signed [Insurance Requirements and Indemnification Agreement](#)
 - Current certificate of insurance, in compliance with the terms outlined in the above agreement
 - University Contractor Safety Orientation
- 4.3 All qualification requirements shall be provided by the contractor before initial work and annually thereafter for recurring work, unless specified otherwise. The University's Riskconnect platform is used for managing and tracking company qualification. The system electronically requests information from the contractor upon initiation by a University department or division.
- 4.4 Contractors performing activities classified as **High Risk** are also required to submit proof of their own programs relative to the scope of work at any time before, or during the job process if the scope changes.
- 4.5 Additional programs may be requested.
- 4.6 Contractors with injury/illness rates above industry averages and insurance ratings will be subject to review and may or may not be granted a Conditional Variance.
- 4.7 All contractors shall be identified in the Riskconnect platform.



5. EMERGENCY APPROVAL REQUIREMENTS

- 5.1 When a contractor is required to address an emergency condition, a temporary Emergency Approval can be obtained. The University Representative requesting the Emergency Approval must have the approval of another individual who is at a Director level or above. The University Representative, to the best of their ability, should ensure the contractor meets University requirements or has adequate controls in place to mitigate risks.
- 5.2 During the temporary Emergency Approval, the contractor should follow the standard process and complete all qualification requirements in Sections 4.2 through 4.5.

6. WORKSITE SAFETY REQUIREMENTS

- 6.1 The following worksite safety requirements apply except as the work type noted in paragraph 1.4 and any exemptions as noted in the Contractor Risk Matrix.
- 6.2 Contractors shall provide direct supervision of their employees and subcontractors. It is expected that any contractor who subcontracts work out shall hold the subcontractor and any sub subcontractors to the same requirements contained within this program.
- 6.3 Contractors allowing workers to work in or around unsafe conditions, perform unsafe acts, or violate permits or regulations may be removed from University premises.
- 6.4 Pre-Job Safety Review Form – for **High Risk** work only
 - The University Representative shall review the Pre-Job Safety Review Form (Appendix A) with the contractor, at the job site and prior to start of work.
 - The University Representative and contractor shall verify whether any corrective action must be taken prior to start of work.
 - Work shall not commence until all identified issues in the Pre-Job Safety Review Form have been addressed.
 - The Pre-Job Safety Review Form is available for electronic use on EHS Insight.

- Exceptions:
 - Contractors who perform routine repair and maintenance work and previously reviewed work are not required to complete the Pre-Job Safety Review Form unless the activity is part of a larger project for which other contractors are or will perform a Pre-Job Safety Review or deemed to be outside of their normal scope of work.

6.5 Job Site Safety Inspections

- The University Representative shall conduct documented periodic worksite reviews to validate the Contractor is performing the work:
 - In a safe manner;
 - In compliance with University environmental, health and safety programs and procedures; and
 - In compliance with all applicable regulatory requirements
- The University Representative is responsible for ensuring that identified deficiencies are corrected by the Contractor in a timely manner.
- Inspections may be documented using a variety of methods which include, but are not limited to, Appendix B (or similar) in EHS Insight, field audits in Qualtrics, and Good Catch reporting in OnBase.

6.6 Job Completion

- The University Representative is encouraged to also inspect the contractor's work area for housekeeping and proper job completion.
- The University Representative shall collect copies of all issued permits from the contractor, if any, and retain them as per the record retention procedure applicable to that permit.

7. CONTRACTOR USE OF UNIVERSITY EQUIPMENT

- 7.1 Contractor use of University owned equipment is generally not permitted.
- 7.2 If use of University equipment is necessary, it shall be



approved and authorized by the University Representative and the Insurance and Financial Risk team in Treasury Services.

- 7.3 The Insurance and Financial Risk team in Treasury Services shall provide and require a waiver for the contractor. The University Representative is responsible for ensuring the contractor signs the waiver and returns the form to Treasury Services for recordkeeping.
- 7.4 All area specific or task specific personal protective equipment (PPE) shall be provided by the contractor.

8. INCIDENT REPORTING

- 8.1 Contractors and subcontractors shall report any OSHA recordable incident and any near miss with catastrophic potential to their University Representative.
- 8.2 The contractor shall notify applicable regulatory agencies with the necessary reporting requirements when applicable.
- 8.3 Upon request, the contractor shall provide the University Representative a complete analysis of the incident with corrective actions in a report for the University's review.

9. EMERGENCY PLANNING

- 9.1 Contractors shall be aware of emergency procedures, including understanding of what to do and where to go in event of various emergency situations. This includes, but may not be limited to:
 - Shelter locations for severe weather
 - Exit routes and assembly areas in the event of a fire, hazardous material release, or other similar event
 - Locations of nearest emergency equipment (safety showers, eyewash stations, etc.)
 - Process for informing emergency personnel (911 or 574-631-5555)

10. PROGRAM REVIEW AUDITS

- 10.1 RMS shall periodically review this program for effectiveness and make changes as necessary.

11. RECORD RETENTION

- 11.1 All records shall be maintained per the University of Notre Dame Records Retention and Disposition Schedule.

Procedure Revision Table	
Revision Description	Date Revision Made
Program developed and approved	July 2019
Minor wording changes throughout	August 2019
Various revisions and edits throughout	September 2019
Minor wording changes throughout	July 2020
Various revisions and edits throughout	February 2022
Updated language with regard to OSHA's Voluntary Protection Program (VPP).	November 2024



Appendix A

Contractor Pre-Job Safety Review Checklist (Example)

This expires when the project is complete or the scope of the project changes.

Date of work: _____ Time Authorized to Start Work: _____

Contractor Name: _____

Contractor Supervisor: _____ Telephone #: _____ Cell #: _____

University Representative: _____ Telephone #: _____ Cell #: _____

Location of work: _____

Job Description/Scope: _____

1. Check requirements for special procedures, training & necessary permits:

Confined Space Entry	Hot Work	Lock, Tag, and Try (LOTO)	
Excavation/Trenching	Scaffold	Fall Protection	
Aerial Lift	Fork Truck	Crane	
Other: _____			

2. Has job/task instruction and/or training been provided? Yes _____ No (If no, explain): _____

3. Check requirements for Personal Protective Equipment (PPE): Check here if no PPE is necessary.

Safety Glasses w/ Side Shields	Goggles	Face Shield	
Hard Hat	Fall Protection	Steel Toed Work Shoes	
Respirator (specify type & cartridge): _____			
Other: _____			

4. Hazards and Emergency Procedures:

	Yes	No-N/A
Have the requirements for Hazard Communication including contractor SDSs, been reviewed?		
Have all contractor personnel been informed of the hazards associated with this job?		
Have all contractor personnel been informed of emergency procedures based on the location of work to be performed, including location of any emergency equipment?		

Nearest phone (Emergency number 1-911, 1-5555)

Emergency Exit Safety shower/Eyewash station

Identify Assembly Point(s): _____

Additional Instructions: _____

Name (print): _____ Signature: _____
University Representative

Name (print): _____ Signature: _____
Contractor Representative



Appendix B
Job Site Safety
Inspection Checklist (Example)

Date: _____ Department: _____

University Representative: _____

Contractor Representative: _____

Contractor Company Name: _____

Project Description:

Site/Work Evaluation

Yes/No/NA

- | | |
|--|--|
| 1. Is the site restricted to prevent unauthorized access? | |
| 2. Has notification of the work been provided to adjacent faculty, staff, students or departments? | |
| 3. Is (are) the contractor(s) using appropriate PPE (eye protection, gloves, shoes, etc.)? | |
| 4. Are appropriate permits completed and available (Hot Work, Confined Space Entry, etc.)? | |
| 5. If the contractor is performing service or maintenance on equipment is it de-energized and do all contractors have a personal lock on the energy point? | |
| 6. Are emergency exits clear and accessible? | |
| 7. Are contractor supplied fire extinguishers available for hot work activities? | |
| 8. Is housekeeping appropriate and acceptable? | |
| 9. If working indoors with hazardous materials, are chemical vapors, fumes, odors, etc., ventilated to the outside? | |
| 10. Are all chemical containers labeled with the name of the chemical and its hazards? | |
| 11. Are personnel working above 4 feet properly protected from falling? | |
| 12. If aerial lifts are being used are personnel using fall protection harnesses and lanyards? | |
| 13. Are all portable tools properly guarded? | |
| 14. Are measures taken to protect workers during extreme weather conditions (hot, cold, wind, etc.)? | |
| 15. Are all ladders used and stored properly and safely? | |
| 16. Are extension cords not daisy chained together and are ground fault circuit interrupters (GFCI) being used? | |

Action Items

List any question answered as NO, and the action taken to correct including notification to the University work originator.

Item Description

Responsible Person

Target Date



Appendix C Contractor Risk Matrix

This matrix is only applicable to contractors not working under a site-specific safety plan (SSSP), which is managed independently from the Contractor Safety Program.

It is the responsibility of departments or divisions to determine the classification of contract work being performed based on the guidelines provided below. The examples of work scopes or work activities are not all-inclusive.

	High Risk	Low Risk
Examples of Work Scopes or Work Activities	• Exposure to live electrical circuits equal to or greater than 50 volts • De-energizing / isolating hazardous energy sources (lock, tag and try) • Entry into confined spaces • Earth excavation, trenching, or other work that requires an excavation permit • Work at heights requiring use of personal fall arrest/restraint systems, use of scaffolding, use of aerial/scissor lifts, bucket trucks, or work on rooftops • Hot work activities outside of designated locations • Use of overhead cranes, gantry cranes, hoists or other lifting equipment • Asbestos disturbance or abatement • Disturbance or removal of lead • Handling of hazardous substances which can cause acute injury, exposure to ionizing radiation sources, or potential to cause explosion • Activities in explosive areas due to potential accumulation of combustible dust or vapor • Industrial motorized equipment operation: forklift, front loader, backhoe, bobcat, skidder, vacuum truck • General construction and demolition work	• Transportation companies or common carriers • Architects, engineers and consultants • Equipment manufacturers or vendors who install, commission or service their equipment on site and that do not perform any work activities specified as High Risk • Vendors or suppliers delivering or picking up materials or other goods • Employees of government agencies on official business • Emergency response personnel while responding to an emergency • Vendors and contractors developing quotations for work. If entering labs or operational areas only if escorted • Those otherwise specifically designated by the University
Worksite Safety Requirements	• Pre-Job Safety Review Form <i>(completed by University representative & contractor prior to start of work)</i> • Periodic Job Site Safety Inspections <i>(conducted by the University)</i>	Exempt from requirements
Other Qualification Requirements	• Proof of Contractor's own programs relative to the scope of work <i>(provided at any time before, or during the job process if the scope changes)</i>	Exempt from requirements