OHS Contractor Management 10 Best Practices

Hiring contractors to work at your site doesn't eliminate your company's compliance obligations under Canadian Occupational Health and Safety (OHS) laws. Host companies remain liable for the OHS violations their contractors and subcontractors commit. This is true even at multi-employer sites where OHS compliance responsibilities are delegated to a prime contractor or constructor with overall charge of safety. That's a big deal given that these firms often carry out high-risk operations. Here are 10 contractor management Best Practices to ensure safety and minimize liability risk.

1. Prequalify Contractors Before Awarding Work

Evaluate the safety and OHS compliance record of prospective contractors before you hire them. **Strategy:** Require all prospective contractors bidding for the job to complete a prequalification questionnaire and documentation, including:

- A copy of their OHS program and pertinent safety policies.
- Worker training and certification records.
- Supervisory competence records.
- Copies of OHS regulatory orders, convictions, and administrative monetary penalties received.
- Documentation of their workers' compensation standing.

- Incident and injury statistics.
- Documentation of their recent experiences performing similar work, including any safety incidents that occurred.
- Insurance coverage.

2. Clearly Define Safety Responsibilities in Contract

Contractor-related violations often occur because of failure to establish clear safety responsibilities for the work. **Strategy:** Negotiate and expressly address these issues in the contractor's written agreement, including:

- Responsibilities for hazard identification and assessment.
- Supervision requirements.
- Permit systems.
- Coordination of contractor safety policies and procedures.
- Emergency response and first aid procedures.
- Machinery, equipment, and PPE safety protocols.
- Incident investigation and reporting responsibilities.

3. Conduct Formal Contractor Orientation

Contractors with effective OHS programs may make mistakes if they're unfamiliar with the unique hazards lurking at the host site. **Strategy:** Before work begins, provide every contractor you hire a site-specific orientation that covers:

- Site hazards
- Restricted areas
- Emergency procedures and equipment
- Incident reporting

- Permit requirements
- Lockout tagout and hazardous energy control processes, and
- Special safety protocols for hazardous operations.

4. Verify Competency & Required Training

Don’t assume a contractor’s workers are properly trained simply because the firm they work for meets your prequalification safety standards. **Strategy:** Before work begins, require the contractor to verify that its workers are qualified to perform the work including documentation of:

- Training in fall protection, confined space entry, lockout/tagout. hazardous substances, or other hazardous work involved.
- Equipment operator certifications.
- Electrical qualifications.
- WHMIS training.
- Respiratory protection training.
- Any other competency required for the work under OHS laws.

5. Assess Hazards Before Contractor Work Starts

While you might have already performed hazard assessment at your site, having contractors do the work may change the risk dynamics and introduce new hazards not covered in your assessment. **Strategy:** Before a contractor starts, ensure that one or more competent person performs a pre-job hazard assessment that considers:

- The existing workplace hazards.
- Hazards created by the contractor’s work.

- Interaction between the contractor's workers and the workers of the host company.
- The performance of simultaneous operations.
- Energy sources.
- Environmental conditions.
- Emergency access and egress.

6. Use Permit Systems to Coordinate & Control High-Risk Activities

One of the biggest safety challenges of having contractors on site is coordinating the safety measures of each firm carrying out or involved in the work. **Strategy:** Specify who's responsible for coordination and require workers to get a written permit to carry out hazardous operations like hot work, confined space entry, excavation, lockout tagout, energized electrical work, and working at heights. Permits help ensure that hazards are identified and controls are verified before work proceeds.

7. Monitor Contractor Safety Performance

Host employers and their OHS coordinators should maintain contractor management and oversight throughout the work. **Strategy:** Conduct periodic inspections to verify that your contractors comply with:

- The host site's OHS policies
- Safe work procedures
- Permit requirements
- PPE requirements
- Other pertinent hazard controls.

8. Manage Subcontractors Carefully

Subcontractors often perform the highest-risk work on a project. Yet, some host companies focus only on the primary contractor. **Strategy:** Ensure your contractor management systems provide for subcontractor:

- Approval and safety qualifications verification.
- Participation in safety orientation and training.
- Compliance with site procedures.

9. Investigate Contractor Incidents & Near Misses

Contractor incidents reveal weaknesses in your contractor management system. **Strategy:** Investigations should determine:

- Immediate causes
- Root causes
- Communication failures
- Supervision deficiencies
- Hazard assessment gaps
- Training issues.

10. Conduct Post-Project Evaluations

A contractor's future eligibility should depend in part on safety performance in the just completed project. **Strategy:** Perform post-project review to assess:

- Incident history.
- Compliance with OHS requirements and site rules.
- The contractor's responsiveness to safety concerns.
- Quality of supervision.

Takeaway

Having an effective contractor management system is a core element of OHS compliance and due diligence. Through careful prequalification, effective oversight, and ongoing evaluation, companies can reduce both injury risks and legal exposure while improving project performance.