



Contractor Safety Program

I. Purpose

This document is provided to ensure all Antioch College safety plans, policies and procedures are communicated to all participating contractors. It provides an avenue for contractors to communicate their safety plans, policies and procedures to the campus. The primary purpose of this program is to prevent personal injuries of all stakeholders.

II. Responsibilities

College Responsibilities

Antioch College has specific safety responsibilities when hiring contractors to come onto the grounds or into the facilities to perform work. Campus responsibilities when hiring contractors include the following listed steps. The campus will:

1. Take steps to protect contract workers who perform work on or near a potentially hazardous process.
2. Obtain and evaluate information regarding the contract employer's safety performance and programs.
3. Inform the contractor of known potential fire, explosion or toxic release hazards related to the contractor's work and the process.
4. Explain the applicable provisions of the emergency action plan to the contractor and require that the contractor dispense that information to all workers who will work at campus facilities.
5. Develop and implement safe work practice procedures to control contract employee entry into hazardous work areas.
6. Maintain a contract employee injury and illness log.
7. Periodically evaluate the contract employer's fulfillment of his/her responsibilities under this policy.
8. Hire and use only contractors who meet Contractor Selection Criteria as listed in the next section of this policy.

Contractor Responsibilities

Contract employees must perform their work safely. Considering that contractors often perform very specialized and potentially hazardous tasks (i.e. non-routine repair activities), their work must be controlled. Contractor responsibilities when accepting contracts with Antioch College include the following listed steps. The contractor employer will:

1. Assure that the contract employee(s) is trained in the work practices necessary to safely perform his or her job;
1. Instruct the contract employee in the potential fire, explosion or toxic release hazards related to his or her job and the process;
2. Assure that the contract employee knows the applicable provision of the emergency action plan;
3. Document contract employee training;
4. Inform contract employees of and then enforce safety rules of the facility, particularly those implemented to control the hazards of the contracted process during operations.
5. Require that all subcontractors abide by the same rules to which this section binds the contractor.
6. Abide by the NO SMOKING policy in any of Antioch College campus facilities and restricted to certain outside locations on campus property.

III. Guidelines for Contractor Selection

The following listed steps are the standard procedures for evaluating and choosing contractors who will work on-site at Antioch College campus facilities:

1. Obtain and evaluate information regarding a contractor employer'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 the premises.

To determine that past safety performance, the group or individual selecting the contractor should consider the contractor's:

- Employee injury records such as Experience Modification Rate (EMR or MOD) for workers compensation for the past 3 years and the contractors past safety record in performing jobs of a similar nature.
- OSHA log, which includes the injury and illness rates (number of lost-time accident cases, number of recordable cases, number of restricted workday cases, number of fatalities) for the past 3 years.
- Incident rates for lost-time accidents and recordables for the past 3 years;
- Written safety program and training system

For contractors whose safety performance in the job is not known, obtain information on injury and illness rates and experience and obtain contractor references.

2. Contractor work methods and experience should be evaluated. Ensure that for the job in question the contractor and its employees have the appropriate:
 - Job skills
 - Equipment
 - Knowledge, experience, expertise

- Any permits, licenses, certifications or skilled tradespeople necessary to be capable of performing the work in question.
3. Contractors are required to provide Antioch College a current copy of all Certificates of Insurance including workers compensation coverage for their employees and maintain minimum coverage of \$1,000,000 for General Liability, Bodily Injury and Property Damage.
 4. Each contractor must be responsible for ensuring that its employees comply with all applicable local, state and federal safety requirements as well as with any safety policy and regulations set forth by this campus at which it is performing the contracted work.
 5. Possible ways to determine past compliance with such safety regulations are:
 - Request copies of any citations for violations occurring within the last 3 years to determine the frequency and type of safety laws violated.
 - Require all bidders on jobs to describe in writing any safety programs in place by the contractor, infractions, accidents and workers compensation claims within the last 3 years. This information will provide Antioch College with a solid background on that contractor's safety performance and adherence to safety rules and regulations.

A. IV. Contractor Guidelines for Information Exchange

Before the contract work begins, the contractor must:

1. Designate a representative to coordinate all safety and health issues and communicate with Antioch College's designated representative.
2. Provide documentation of any necessary safety training as described in the Training Requirements section of this policy to Antioch College's designated representative.
3. Provide information to the designated representative on the safety and health hazards that may arise during the course of the contractor's work at Antioch College facilities and the means necessary to avoid danger from those hazards including Hazard Communication and all other potential hazards.
4. Obtain Antioch College safety rules and regulations in effect at the site or potential hazards present that may affect the contractor's work.
5. Ensure contractor is informed of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be certain to have the telephone numbers of the nearest hospital, ambulance service and fire department.
6. Advise and train contractor employees on hazards associated with the work to be performed or other hazard information provided the contractor by Antioch College's designated representatives.
7. Keep the Antioch College representative fully informed of any work, which may affect the safety of its employees or property. This includes complying

with the state and federal Right-to-Know legislation and providing the ANTIOCH COLLEGE representative appropriate material safety data sheets (MSDSs) or other required information about hazards materials the contractor plans to bring on site. This must be done and pre-approved by the site-Hazard Communication program director before such hazardous materials are brought on site [See: Procedure on Hazardous Materials Approval Process].

8. Identify who to call and what to do in emergencies and where first-aid and medical services are located and train contracted employees on this information.

During the contract work, the contractor will:

1. Ensure that all subcontractors abide by this policy.
2. Perform its work while the plant is operating, if necessary, and establish necessary safe practices to permit work under operating conditions without endangering Antioch College employees, associates and property. This includes but is not limited to barricading, sign-posting and fire watches.
3. Ensure that any equipment, hazardous materials or procedures used by the contractor to perform contracted work meets all OSHA requirements.
4. Act responsibly and be accountable for any losses or damages suffered by Antioch College and/or its employees as a result of contractor negligence.
5. Provide its employees with medical care and first aid treatment. Plant first aid facilities may be used only in case of emergencies.
6. Use only the plant or building entrance designated and follow the facility access control practice. The contractor also will ensure that each contractor employee is issued and wears some form of easily seen identification.
7. Provide all contracted employees adequate training in all health and safety aspects of the work involved in the contract.
8. Provide all tools and equipment for the work including personal protective equipment (PPE) and ensure the equipment is in proper working order and employees are instructed in its proper use and care.
9. Maintain good housekeeping in the workplace.
10. Follow specific instructions supplied by Antioch College should emergency alarms be activated.
11. Notify the Antioch College representative immediately of any OSHA recordable injury or illness to contractor employees or subcontractor employees occurring while on Antioch College property. Provide a copy of each accident report to the Antioch College representative.
12. Receive and use a copy of the facility's written safety policies and procedures (See: *Safety, Health & Environmental Program*)
13. After conclusion of the contract work, the contractor is responsible for cleaning all work areas and disposing of any discarded materials in a proper and legal manner.

V. ANTIOCH COLLEGE Guidelines for Information Exchange

Before contract work begins, ANTIOCH COLLEGE will:

1. Designate a representative to coordinate and communicate all safety and health issues and communicate with the contractor. The designated representative is responsible for ensuring that all campus responsibilities listed below are carried out. The designated campus representative for this site is Reggie Stratton, Physical Plant Director.
2. Provide a copy of the facility's written safety policies and procedures to the contractor.
3. Inform the contractor of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be given the telephone numbers of the nearest hospital, ambulance service and fire department.
4. Conduct an inspection of the proposed worksite area before the pre-start up meeting so any known information about on-site hazards, particularly non-obvious hazards are documented and thoroughly communicated to the contractor.
5. Work directly with the contractor's designated representative.
6. Conduct a pre-start up meeting (walk through) with the contractor's designated representative and a supervisor from each of the areas of the plant involved in the contractor's work.
7. Review all 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. Advise the contractor that the facility safety and health policies must be followed. A copy of the facility's safety plans must be furnished to the contractor.
8. Inform contractor's designated representative of the required response to employee alarms and furnish the contractor with an explanation of the alarms.
9. Communicate thoroughly with the contractor's designated representative any safety and health hazards (particularly non-obvious hazards and hazard communication issues) known to be associated with the work including those in areas adjacent to the worksite. Tell them it is the contractor's responsibility to convey this information to its employees.
10. Review preparation of worksite before contractor begins initial work.
11. Identify connect-points of all services like steam, gas, water, electricity, etc. Define any limitations of use of such services.
12. Ensure that all affected employees at Antioch College are aware and receive training on all hazards to which a contractor will introduce them.

During the contract work Antioch College must:

1. Limit, as necessary, the entry of employees into contractor work areas.
2. Monitor the contractor's compliance with the contract throughout the duration of the work. When checking contractor work during the project, note any negligent or unlawful act or condition in violation of safety standards or requirements. Any items noted should be brought immediately to the

attention of the contractor's representative in writing with a copy of the notice being sent to the contractor's home office concurrently.

However, if an unsafe act or a condition is noted that creates an imminent danger of serious injury, immediate steps should be taken with the contractor's designated representative, or in his or her absence, the contractor's employees to stop the unsafe act or condition. Do not allow work that is in violation of a regulation to continue.

3. Document all discussions, including place, time and names of contractor employees in attendance.
4. Approve the contractor beginning work each day unless it is routine service or maintenance work or periodic outdoor service or maintenance work.
5. For work for which Antioch College has developed specific and generally applicable procedures ensure contractors and their subcontractors follow the same procedure.
6. We will allow loaning of tools and equipment to outside contractors and their subcontractors. The contractor is required to complete and sign an "Equipment Authorization Form" releasing Antioch of liability for injury or death resulting from said use of equipment.
7. Contact the nearest medical facilities, when available, in emergency situations where severity of injury dictates immediate attention.
8. Obtain a copy of each OSHA recordable injury report from the contractor and subcontractor. Investigate and report to the Physical Plant Director all personal injuries to contractor and subcontractor employees. Investigate and report any property losses. Maintain a contractor accident report file.

After conclusion of the contract work, complete a post-project assessment of the contractor's safety performance for the Physical Plant Director to be used for future reference with a recommendation on whether or not to re-hire the contractor.

VI. Training Requirements

Contractor Requirements

The contractor must:

1. Train all workers on all safety and health hazards and provisions applicable to the type of work being done and provide documentation of such training to Antioch College's representative.
2. Train employees on where to obtain first-aid and medical services.

ANTIOCH COLLEGE Requirements

The campus must:

1. Ensure that affected campus employees receive training on all hazards to which a contractor will introduce them.
2. Emphasize to the contractor that it is the contractor's responsibility to convey to its employees any safety information provided by Antioch College to the contractor.

VII. Recordkeeping Requirements

Contractor

1. Keep records of all training done with contract workers and all documentation provided to the contracting campus regarding such training.
2. Keep copies on file of all forms or statements related to the contract that are required by Antioch College to be filled out before or during contract work.
3. Maintain on file the telephone numbers of the nearest hospital, ambulance service and fire department.
4. Maintain copies on-site of all material safety data sheets (MSDSs) or other required information about hazardous materials relevant to the work on-site.
5. Keep an OSHA recordable injury and illness log for the project as well as copies of accident reports on all accidents that occur in the course of the project.

Antioch College

The Antioch College representative will:

1. Retain a copy of the contract on file and be thoroughly familiar with its contents and with safety and health aspects of the work.
2. Maintain records of all training done with campus workers regarding hazards to be caused by the contracting campus.
3. Maintain copies on file of all forms or statements related to the contract that are required by Antioch College to be filled out before or during contract work.
4. Maintain an OSHA recordable injury and illness log for the project as well as copies of accident reports on all accidents that occur in the course of the project.
5. Keep a daily log regarding pre-work start-up inspection findings.
6. Maintain records of all documentation of any sort given to you by the contractor including records of training done, MSDSs, accident reports, etc.

7. Keep records of all documentation of any sort you give to the contractor including a list of hazards to train their employees on, MSDSs, etc.
8. Document all discussions, letters, memos or other communications made to the contractor regarding safety issues, (include place, time, names of people involved).

**CONTRACTOR SAFETY
PRE-QUALIFICATION FORMS**

Project Activity: _____

Start Date: _____

Contractor: _____

Address: _____

College Safety Administrator: _____

B. EXPECTATIONS

Antioch expects the following:

- Contractor employees must be fully trained by their employer in all aspects of their job including safe work practices.
- All work must be done in accordance with state code, specifications, and accepted good work practices and in compliance with all local, state and federal regulations.
- Contract employer will provide all tools and equipment for its employees needed to complete the project.
- The contract employer will provide all personal protective equipment for its employees.
- A contract representative to evaluate the worksite and identify the proper tools, personal protective equipment and procedures in coordination with Antioch's safety procedures.
- Contract employees can be asked to leave Antioch property if they do not follow general safety good practices and policies

REQUIREMENTS

The engaged contractor and all of its employees who perform work on Antioch properties are required to comply with the Occupational Safety & Health Administration (OSHA), Environmental Protection Agency (EPA) and other local, state and federal regulations as well as the contractor's safety program. All such employees are expected to have knowledge of and adhere to these regulations while on Antioch properties.

Safety practices include: Control of Hazardous Energy, work above ground level, hazard communications, personal protective equipment, drug and alcohol compliance, fire protection, good housekeeping and emergency evacuation.

Enclosed: Copy of Antioch College Safety, Health & Environmental Programs