Establish Effective Communication and Coordination for Host Employers, Contractors, and Staffing Agencies

Improve Your Communication and Coordination Plans

Ready for Level 2?

	YES (√)	NO (X)
You have established plans for coordinating and communicating with contractors and staffing agencies		Visit Communication and Coordination (1CC_1)
Your plans include exchanging information on the requirements in your health and safety program and the hazards in your facilities		Visit Communication and Coordination (1CC_1)
Contractor and staffing agencies are also giving you information on the hazards associated with their work, as well as relevant incidents and concerns		Visit Communication and Coordination (1CC_1)

To-Do
Evaluate your communication and coordination plans.
☐ Reduce confusion—formalize your communication and coordination plans.

Evaluate your communication and coordination plans

You've made a great start telling contractors and staffing agencies about the hazards they may encounter at your worksite. You've also provided information on your safety and health program, including requirements they will need to follow. Now it's time to dig a little deeper and focus on the effectiveness of these efforts. Instead of the "what," it's time to look at the "how."

Start with any evaluation you've already done of your coordination with contractors or staffing agencies (see Program Evaluation and Improvement worksheets) to look for areas you can improve. For example, you may have provided your safety and health program to the contractor or staffing agency and realized there are differences and/or gaps between your program and theirs. This worksheet will help you tailor how you coordinate your safety and health program information and develop a contractor or staffing agency guide. This approach will help you relay your program requirements to contractors and staffing agencies to resolve any

differences in safety and health practices. You may also find they have things in their program that you want to incorporate into yours. For example, turnover might be high among contractors and staffing agency employees who work at your organization. Determine how often training should be conducted to keep pace with the turnover rate. Consider offering the training on an as-needed basis or as part of the orientation for new workers. See the appendix at the end of this worksheet for examples of hazard-specific topics.

When you evaluate your communication and coordination, consider questions like these:

- Do we have safety and health selection criteria (for example, OSHA incident rates, experience modification rates, OSHA history) and desired qualifications for contractors and staffing agencies? What are they? Has this information been communicated?
- What is our process for vetting contractors for safety and health?
- How do contractors/staffing agencies receive ongoing communication of our safety and health requirements?
- How do we monitor contractor and staffing agency compliance with safety and health requirements and expectations?
- How are we notified of incidents and how they might affect our workers?
- What is our system for seeking—and addressing—input on safety and health from contractors and staffing agencies? Is it effective?
- Are contractor or staffing agency hazard control processes compatible with our requirements? For example, does their process for ultraviolet exposure during tungsten inert gas welding fit your requirements?

Formalize your approach

Every company has its own way of managing safety and health, even if their goals and basic needs are the same. This can be confusing or even risky when you work with another company. For example, a contractor's lockout/tagout procedure might use different forms of tagging or lockout than you do.

That means it's crucial to create a formal process for communication and coordination. Some things to consider:

- Make sure your contractor understands the safety and health requirements written into contracts. Do the same for roles and responsibilities.
- Make sure you understand each employer's safety and health program and policies. Identify gaps to address before work begins.
- If a contractor plans to bring a potential hazard on-site (a chemical, vehicles, construction equipment, etc.), set up an approval process as you would for your own operations.
- Make sure contractors, staffing agencies, and their workers know how to notify you about concerns, incidents, and conflicting practices. Do this before work begins.

Pro Tip: Consider Safety and Health Early in the Process

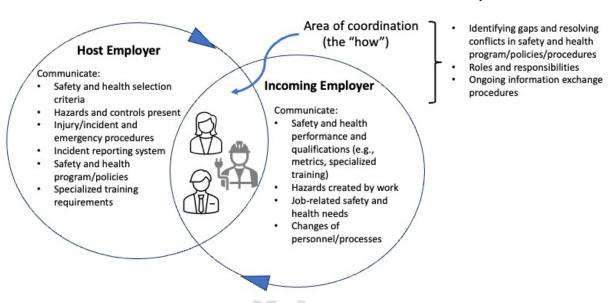
Don't wait until contracts are signed and workers are on-site: start communicating and coordinating among employers as soon as possible. The best time to start is at the beginning when you're negotiating the scope of work, before materials and services are procured. Evaluate the potential hazards and risks, include them in your selection criteria, and provide them up front during negotiations.

By collaborating early on, you can identify gaps and challenges. Build this collaboration into your contract or, for short-term work such as a one-time repair, have a conversation and resolve conflicts. Inform all affected workers before the work begins.

- Have a process to work with other employers to deal with unexpected staffing needs by ensuring that
 enough trained and equipped workers are available or there's enough lead time to train and equip
 workers.
- Be aware of any language differences between organizations and workers.

The figure below shows example feedback loops for communication and coordination between you as the host employer and the contractor or staffing agency.

Communication and Coordination Feedback Loops



Questions/requests for contractors and staffing agencies

The following are requests and questions you can ask contractors to evaluate potential hazards and determine the effectiveness of their safety and health practices. The responses will be useful in your bidding and selection process, contract development, and coordination with the contractor or agency before and during the work:

- Please provide copies of your safety and health program and policies relevant to the work being performed.
- Please provide copies of your injury and illness data, including any OSHA 300 logs.
- What hazards, including hazardous materials and activities, might be brought to the jobsite? How will these be monitored and evaluated while work is performed?
- What special permitting processes are required (e.g., hot work, confined space entry)?
- What qualifications are needed, or what specific safety and health training has been provided, for the proposed work?
- What changes to our work activities will be needed on the jobsite where work takes place?
- Who is your safety representative who can be contacted whenever your workers are on-site?

The bottom line is that you want to ensure your processes work well together to minimize the impact to your organization and their workers. This requires clarity and documentation related to how communication and coordination will take place between you and your contractors and staffing agencies.

Activity: Develop a contractor guide

A guidebook for contractors and staffing agencies can be a handy reference on your requirements and expectations. It can help those companies identify gaps and resolve conflicts in safety and health programs, policies, and procedures. In this exercise, you'll identify content for a guide using the framework of OSHA's <u>Recommended Practices for Safety and Health Programs</u> along with information on your contractors and staffing agencies.

Steps

- 1. Assemble a team to help write your guide. They should be familiar with the activities that contractors and staffing agencies will carry out at your worksite. Some requirements are universal, but some only apply to certain contractors/staffing agencies—for example, office work or electrical maintenance.
- 2. Brainstorm the main sections of the guide and create an outline. (See the example on the next page, which you can use as a template.) The length of the guide may depend on the size and types of activities in your organization. You can use the safety and health program elements (management leadership, worker participation, hazard identification, etc.) as a starting point, modified as needed. Identify the information you need to communicate and receive for each element. Then list subtopics for each main section.
- 3. Create a table of contents based on your outline. It should guide users to the information that's relevant to the work they'll do at your site.
- 4. Using the outline, develop the needed text, or add it from your safety and health program.
- 5. Once your guide is finished, distribute it to current contractors/staffing agencies. Make sure future contracts require adherence to the guide.
- 6. As part of continual improvement, set up a way for your workers, contractors, and staffing agencies to provide feedback on it. Review the guide at least annually to identify changes needed to protect all workers at your site.

Template for Contractor Guide

Section 1: Management Leadership Subtopic: Example: Your policy and expectations Subtopic: Subtopic: Subtopic: Subtopic: **Section 2: Worker Participation** Subtopic: Example: Ways to report hazards/incidents Subtopic: Subtopic: Subtopic: Subtopic: **Section 3: Hazard Identification** Subtopic: Example: Hazard-specific control requirements. (See the appendix of hazard-specific topics at the end of this worksheet.) Subtopic:

Subtopic:
Subtopic:
Subtopic:
Section 4: Hazard Prevention and Control
Subtopic:
Example: Corrective and preventative action
Subtopic:
Subtopic:
Subtopic:
Subtopic:
Section 5: Education and Training
Subtopic: Example: Warnings and hazard information
Subtopic:
Subtopic:
Subtopic:
Subtopic:

Section 6: Program Evaluation and Improvement
Subtopic:
Example: Corrective and preventative action
Subtopic:
Cultaria
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Section 7: Multiampleuse Communication and Coordination
Section 7: Multiemployer Communication and Coordination
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Appendix: Example hazard-specific questions for contractors working on your site

See OSHA's list of topics for more information about the items below.

ASBESTOS

Will the project disturb (or otherwise affect) any asbestos-containing material? Will it affect that material in another way?

BARRICADING AND FENCING

Are barricades needed to alert others to hazards created by the contractor. Are they needed to ensure vehicle and pedestrian traffic safety on the worksite?

BLOODBORNE PATHOGENS

Is exposure to bloodborne pathogens likely on your project? People can be exposed when they handle infectious materials or work in an environment where serious injuries are likely.

CONFINED SPACES

Will contractor employees need to enter confined spaces?

A confined space is any space for which all of the following are true:

- It is large enough and so configured that an employee can bodily enter and perform assigned work.
- It has limited or restricted means for entry or exit. (For example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.)
- It is not designed for continuous employee occupancy.

ELECTRICAL

Is the contractor's work likely to affect the electrical system?

FALL PROTECTION

Will the contractor work at unguarded locations above 4 feet (OSHA rule for general industry) or 6 feet (OSHA rule for construction projects)?

HAND AND POWER TOOLS

Will contract employees use hand and portable power tools?

HOT WORK PERMITS

Will the contractor's work involve heat, flame, sparks, or smoke? (Some examples of hot work: brazing, cutting, grinding, soldering, gas or arc welding, torch-applied roofing.)

INDOOR AIR QUALITY

Will the contractor be working next to or inside an occupied space?

LEAD-BASED PAINT

Will the contractor's work involve manipulation and/or demolition of paint that may contain lead?

CONTROL OF HAZARDOUS ENERGY (LOCKOUT/TAGOUT)

Will the contractor's work require control of electrical, pneumatic, mechanical, thermal, hydraulic, or chemical energies to prevent serious or fatal injuries?

MOLD

Will the contractor's work disturb (or otherwise affect) materials suspected of having mold?

OCCUPATIONAL NOISE EXPOSURE

Will the contractor's work generate enough noise to require a hearing protection program if you do not already have one? Will you have to re-monitor to ensure employee exposures are not above action levels?

POWERED INDUSTRIAL TRUCKS

Will the contractor's work involve the use of aerial work platforms, fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines?

RESPIRATORY PROTECTION

Will the contractor's work expose employees to airborne dusts, mist, gases, or chemicals that might require the use of respiratory protection?

SCAFFOLDING

Will the contractor use scaffolding on this project?

TRENCHING AND EXCAVATION

Will the contractor's work involve drilling, digging, or trenching?