Northwestern
Contractor Safety Program
Risk Management
Table of Contents

I. Program Goals and Objectives .............................................................................................................. 2

II. Scope and Application .......................................................................................................................... 2

III. Responsibilities ...................................................................................................................................... 2

IV. General Requirements ........................................................................................................................ 3

V. Specific Requirements .......................................................................................................................... 4

VI. Research Laboratory Access .............................................................................................................. 8

VII. Incident Reporting ............................................................................................................................. 8

VIII. Recordkeeping .................................................................................................................................. 8

IX. Regulatory Authority ........................................................................................................................... 9

X. Contact .................................................................................................................................................. 9

Appendix 1 – Contractor Safety Program Reference Index ......................................................................... 9
I. Program Goals and Objectives
This program establishes minimum guidelines for safety and accident prevention during construction, renovation, and maintenance activities at Northwestern University, in accordance with the Northwestern Environmental Health and Safety (EHS) Policy and programs.

II. Scope and Application
The Contractor Safety Program applies to all contractors who perform construction or maintenance activities on behalf of Northwestern. The term ‘Contractor’ is to be construed liberally, to apply to all vendors who have on-site construction or maintenance activities as identified below. For the purposes of this program, the term ‘Contractor’ does not apply to subcontractors.

Construction and maintenance activities include, but are not limited to, plumbing, electrical, carpentry, landscaping, telecommunications, recycling, elevator repair and maintenance, window washing, roofing, machinery/equipment installation or removal, crane operations, hot work operations, utility plant services, HVAC, custodial services, painting, pest control, hazardous and universal waste handling and disposal, survey and investigation activities, and other similar activities.

Contractors retain primary responsibility for the safety of their worksites, employees, and the safety of any Northwestern staff, faculty, or students they may come in contact with. Contractors are accountable for regulatory compliance, implementing effective safety programs, adequate training, and adherence to all reporting requirements.

Contractors must coordinate all work with their project manager, which is defined as a their main point of contact for the work being performed on university property (e.g., Northwestern Chief Engineer, Chief Electrician, Project Manager, Building Manager, other University Representative).

III. Responsibilities
A. Contractor
   i. Adhere to this program and the Northwestern EHS Policy.
   ii. The contractor’s person responsible for jobsite EHS must complete the Northwestern University Contractor Safety Program online acknowledgement, at least every 3 years.
   iii. Responsible for following their own Safety and Health Program and complying with all federal, state, and local laws, in addition to any site specific requirements established within Northwestern’s Contractor Safety Program.
   iv. Provide a safety representative or designate an individual responsible for addressing worksite EHS concerns.
   v. Depending on the nature of the work, submit a plan detailing the scope of to Risk Management for review.
   vi. Ensure all employees have the proper knowledge and training, such as OSHA 10-hour or 30-hour, the general safety requirements for the project, as well as any task-specific training required, and access to required personal protective equipment. Proof of training must be available upon request.
   vii. Ensure all subcontractors adhere to safety and health requirements.
   viii. Report all incidents to Northwestern Project Managers and OSHA, if applicable.
B. Northwestern University
   i. Project Managers
      a. Notify Risk Management of all incidents, injuries, and near misses.
      b. Coordinate shutdowns, lockout/tagout, hot work permits, confined space entries, fire
         protection or detection system impairments, or any other tasks requiring
         authorization, permitting, support, or intervention.
      c. Partner with Risk Management to address EHS concerns.
      d. Notify contractors of known hazardous conditions and provide site-specific
         information, such as confined space assessments, asbestos testing results, and rooftop
         anchor certifications.
      e. Contact the laboratory representative when work involves access into laboratory
         spaces to obtain hazards, personal protective equipment requirements, and any other
         critical information to ensure the work can be performed safely.
   ii. Risk Management
      a. Maintain the database of Contractor Safety Program acknowledgements and persons
         responsible for jobsite EHS.
      b. Provide guidance and technical assistance as needed, including assistance in reviewing
         and accepting contractor safety and work plans.
      c. Review, audit, and revise this program annually.

IV. General Requirements
   The general requirements apply to all contractors subject to this program.

   A. Housekeeping
      i. Work areas, passageways, and doors must be kept free of debris and hazards to allow for
         unobstructed egress at all times.
      ii. Debris should be removed daily and should be eliminated in all areas where there is not an
         active sprinkler system.
      iii. Separate waste containers must be maintained for waste, oily and used rags, and other
           flammable or hazardous wastes.

   B. Pandemic safety plans and procedures
      i. During public health crises, such as COVID-19, contractors must develop project-specific
         safety plans and procedures that address guidelines and best practices provided by the
         Centers for Disease Control and Prevention (CDC) and the Occupational Safety and Health
         Administration (OSHA), and must be in accordance with any ordinances and executive
         orders set forth by the federal government, city, or state.
      ii. Plans and procedures must comply with applicable Northwestern policies or procedures
          and must be implemented prior to the commencement of work.
      iii. Plans and procedures must be communicated to employees and any other affected
           personnel (e.g., subcontractors, Northwestern staff, faculty, students).

   C. Site safety
      i. Contractors must have and adhere to a safety program applicable to the work performed
         at Northwestern.
ii. Establish and enforce site specific personal protective equipment requirements for all personnel, visitors, and Northwestern employees.

iii. Worksites must have fire extinguishers readily available.

iv. Smoking, including the use of electronic cigarettes and vaping, is prohibited in Northwestern University buildings, including buildings under renovation, and within 25-feet of building entrances, as well as in designated outdoor facilities.

v. Safety Data Sheets (SDS) must be readily available for all hazardous materials present at the worksite.

vi. An emergency action plan must be developed for the worksite.

vii. Do not prop or leave doors open in work areas when not attended.

viii. On construction and renovation worksites, contractors must post a sign indicating the worksite EHS representative’s contact name and phone number, in a conspicuous location.

D. Stop-work authority

i. Northwestern employees have the authority to stop work if unsafe acts or conditions are observed.

ii. Contractors are required to stop work immediately if requested.

iii. It is the responsibility of the contractor to take corrective actions to ensure that conditions are safe prior to resuming work.

V. Specific Requirements

The specific requirements apply to contractors subject to this program who are performing work in any of the following categories:

A. Aerial work platforms

i. Contractors must adhere to Northwestern’s Aerial Work Platform program.

ii. Operators must be trained and authorized.

iii. Aerial work platforms must be inspected by the authorized operator prior to operation.

B. Confined spaces

i. Notify the project manager prior to any activities involving confined spaces.

ii. Contractors must have a program that meets or exceeds Northwestern’s Confined Spaces Program and must adhere to the Guidelines for Contractors Working in Confined Spaces which can be found in Appendix 5 of the program.

iii. No entry may be performed until Risk Management and Facilities Operations evaluate the space and identify the hazards, and communicate the evaluation to the contractors.

iv. The project manager must authorize the entry by signing and dating the entry permit.

v. For construction projects, adhere to OSHA construction standards and notify the project manager of the addition, removal, or change to confined spaces on Northwestern property.

C. Cranes and rigging

i. Crane lift and logistics plans must meet the requirements of Northwestern’s Mobile Crane Checklist and be submitted by project managers to Risk Management for review if the operations take place outside of a construction worksite or are critical lifts, which are defined as:

   a. Loads 75% or more of the rated crane capacity
b. 2 or more cranes required to perform a lift
c. Movement of crane carriage with a load
d. Use of personnel platforms
e. Sensitive loads
f. Hoisting loads over occupied buildings, or
g. Work involving encroachment on a public right-of-way

ii. Lift plans must include swing radius protection, nearby power lines, overhead hazards, pedestrian/vehicle traffic, taglines, methods of communication, weather operating parameters, staging/hoisting areas, and safety procedures.

iii. Building floors directly below any rooftop landing area or any other work area below hoisting operations must be evacuated during operations.

iv. The fire department must be notified if crane operations will block or partially block fire lanes.

v. Locate underground utilities and hazards and verify ground conditions can support crane operations.

vi. Cranes and equipment must be inspected by the crane operator prior to each shift.

vii. Crane certifications must be current and valid.

viii. Crane operators, riggers, and signal persons must have valid licenses and certifications and must be available upon request.

ix. Develop and implement a dust control plan during demolition work.

x. Coordinate with the project manager to ensure that interim measures are developed for building occupants when any building exit is blocked by crane operations. Risk Management must approve Interim Life Safety Measures.

xi. Crane lifts that occur within construction worksites controlled by the contractor must:
   a. Adhere to items ii-xi of this section.
   b. Notify the project manager of any critical lifts as defined in this section.

D. Control of hazardous energy (lockout/tagout)

i. Contractors must coordinate all lockout/tagout activities with project managers and adhere to Northwestern’s Control of Hazardous Energy (Lockout/Tagout) program for all service and maintenance requiring the isolation and de-energization of hazardous energy sources.

ii. All lockout/tagout activities must be completed in the form of group lockout/tagout. Northwestern Facilities will shut down machines, equipment, and systems prior to any work beginning, then all parties will apply their locks.

iii. Contractors are responsible for supplying their own locks and tags. These devices must meet the requirements outlined in Northwestern’s Control of Hazardous Energy (Lockout/Tagout) program.

E. Dust / odor control

In the event demolition and construction activities may potentially create dust and odors that adversely affect contractor personnel as well as people in adjacent areas, contractors must:

i. Evaluate the spaces and areas they will be working in and identify hazards that will contribute to airborne particulates or odors.

ii. Utilize the appropriate personal protective equipment for dust and particulate related work.

iii. Identify and implement effective dust and odor control methods, such as water,
ventilation, tools equipped with dust collection systems, sweeping compound, or barriers, prior to the start of work.

iv. Monitor adjacent areas as work proceeds. Modify dust and odor control measures if found to be ineffective.

v. When using products with crystalline silica, contractors must have a crystalline silica exposure control plan.

F. Electrical
   i. All electrical work must be performed de-energized; if not feasible, refer to Section P.
   ii. Barrier or guard passageways, mechanical rooms, and other worksites where electrical work is being performed.

G. Fall protection
   i. Contractors must adhere to Northwestern’s Fall Protection program.
   ii. Establish and implement a fall protection plan under the supervision of a competent person, and provide fall protection when workers will be exposed to fall hazards 4-feet or greater in height (e.g., roofing work, steel erection).
   iii. Protect employees from fall hazards with the use of guardrails, gates, covers, personal fall protection systems, lifelines, or other effective means deemed appropriate to eliminate or reduce the hazard.

H. Fire detection and protection impairments
   i. Impairments to existing sprinkler systems, fire detection systems, fire pumps, special fire protection systems, or similar must be performed by Northwestern personnel.
   ii. Notify the project manager if any impairment is necessary.
   iii. When possible, plan impairments when the building or affected area is not occupied.
   iv. Plan for temporary protection as necessary including, but not limited to, a fire watch and extra fire extinguishers.
   v. Hot work is prohibited while fire detection and protection systems are impaired. Exceptions must be submitted to the project manager and approved by Risk Management.

I. Fire prevention
   i. Contractors must adhere to Northwestern’s Fire Prevention program.
   ii. Provide fire extinguishers appropriate for the conditions and hazards present in construction areas.
   iii. Remove all trash and refuse from worksites daily.
   iv. If a fire prevention deficiency is noted by Risk Management, the project manager, or other authority, work shall be stopped until the deficiency is addressed.
   v. Temporary heating devices on construction sites must be located at least 10-feet from combustible materials, such as tarpaulins, canvas, or similar coverings. Fresh air must be supplied in sufficient quantities to maintain the health and safety of workers. Contractors must adhere to manufacturer guidelines for safe use on worksites. Solid fuel salamanders are prohibited in buildings and scaffolds.

J. Hazard communication
   i. Contractors must adhere to Northwestern’s Hazard Communication program.
   ii. Chemical inventories and SDSs must be readily available upon request.
iii. Properly remove all unused and waste chemical products.

K. Hazardous waste / universal waste
   i. Contractors are responsible for all hazardous and universal waste on projects and work sites and must adhere to Northwestern’s Hazardous Waste program.
   ii. Hazardous and universal waste must be labeled, handled, stored, and disposed of in accordance with applicable regulations.
   iii. Permits must be obtained when required (e.g., asbestos abatement) and a copy of the hazardous waste manifest must be provided to Risk Management.

L. Hot work
   i. Contractors must adhere to Northwestern’s Hot Work Permit program.
   ii. Notify the project manager to request a hot work permit. Follow the instructions and safeguards on the permit, and post the permit at the work site. Completed permits must be returned to the project manager.
   iii. A signed copy of the permit must be posted near the work site.
   iv. For renovations or work on existing buildings, coordinate with the project manager to verify fire protection systems are operational and available.
   v. Utilize a trained and competent fire watch with appropriate extinguishers for one hour after the completion of work.

M. Material handling equipment
   i. Contractors must adhere to Northwestern’s Material Handling Equipment program.
   ii. Operators must be trained and authorized.
   iii. Material handling equipment must be inspected by the authorized operator prior to operation.

N. Scaffolding and job-made ladders
   i. Contractors must adhere to Northwestern’s Fall Protection program.
   ii. Erect and disassemble scaffolding under the direction of a competent person; scaffolding must support 4 times the intended load.
   iii. Employees must be protected from falling on scaffolds 4-feet or greater in height.
   iv. Falling object prevention must be utilized including, but not limited to, guardrails, toeboards, netting, or barricading.
   v. Job-made ladders must be constructed and maintained to current ANSI standards.

O. Trenching and excavations
   i. Notify the project manager prior to any trenching or excavation.
   iii. Mark out the planned excavation site with white paint or flags (black when snow is present).
   iv. The contractor performing the digging must contact JULIE by calling 811 or (800) 892-0123. Utilities must be located at the worksite prior to the start of work.
   v. The project manager will provide written or verbal approval to commence digging once utilities have been located and the contract between Northwestern and the contractor is fully-executed.
vi. Trenching and excavating activities must be performed under the supervision of a competent person.

vii. Identify material for protection of personnel (e.g. bracing, shoring, shielding, and trench boxes) as determined by soil type.

viii. Barricades must be in place to protect equipment, pedestrians, workers, and vehicles from fall hazards.

P. Working on or near live utilities
i. Contractors must adhere to Northwestern’s Working On or Near Utilities program when working on or near live utilities (e.g., electrical, steam).
ii. Perform all utility work de-energized when possible.
iii. If it is not feasible to perform the work on de-energized utilities, notify the project manager.
iv. Northwestern authorization and safe operating procedures are required for all work on or near live utilities.

VI. Research Laboratory Access
Northwestern research laboratories may contain chemical, radiological, biological, laser, or magnetic field hazards. Spaces containing these potential hazards will have signage where applicable. It is imperative that contractors and subcontractors obey all signage requirements, restrictions, and follow all protocols set forth by Northwestern to ensure a safe working environment at all times.

Contractors must obtain authorization from a laboratory representative, such as the principal investigator, lab manager, or safety designate, prior to entry into any laboratory space and before any work can commence. If contractors are working under the direction of a Northwestern project manager, the project manager is responsible for obtaining the aforementioned authorization for contractors prior to entry and commencement of work.

Do not leave doors to research lab areas open/unsecured when not attended.

Contractors are not to disturb or move any materials or equipment in the laboratory space unless a laboratory representative provides specific approval to carry out such tasks. If hazardous or unexpected conditions become present in the laboratory space, stop all work, exit the space, and notify the Northwestern Office for Research Safety and laboratory representative immediately.

VII. Incident Reporting
Contractors must report all incidents (e.g., injuries, near misses, property damage) to the project manager. Contractors must conduct incident investigations to determine root cause and corrective actions and submit to Risk Management. Risk Management will contact the contractor with any questions related to the investigation. All contractors and subcontractors are responsible for cooperating with Northwestern investigations and reporting injuries, medical emergencies, fires, property damage, or any other reportable incidents to Northwestern and regulatory authorities, if applicable. All incidents, including near misses, must be reported within 24 hours.

VIII. Recordkeeping
Northwestern and contractors must follow all regulatory requirements for recordkeeping.
IX. **Regulatory Authority**

Northwestern and contractors will comply with Occupational Health and Safety Administration (OSHA), and other applicable codes and standards.

X. **Contact**

For questions, contact Chris Yohe, EHS Lead, at chris.yohe@northwestern.edu or (847) 467-6342.

### Appendix 1 – Contractor Safety Program Reference Index

<table>
<thead>
<tr>
<th>Content</th>
<th>Website Address</th>
</tr>
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<tbody>
<tr>
<td>EHS Policy</td>
<td><a href="https://policies.northwestern.edu/docs/university-ehs-policy-final.pdf">https://policies.northwestern.edu/docs/university-ehs-policy-final.pdf</a></td>
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