Northwestern
Contractor Safety Program
Risk Management Services
# Contractor Safety Program

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I. Program Goals and Objectives
This program establishes guidelines for contractor worksite safety and accident prevention during construction, renovation, and maintenance activities at Northwestern University.

II. Scope and Application
This program applies to any Northwestern unit or department that utilizes contractors on Northwestern property; this program also applies to all contractors and subcontractors hired by a unit or department of Northwestern.

III. Responsibilities

A. Contractors
i. Responsible for developing and administering a Safety and Health Program for employee protection and accident prevention, compliant with all regulatory requirements; a designated safety representative should be appointed
ii. Depending on the nature of the work, submit a plan detailing the work scope to Risk Management Services for review
iii. Read, sign, and return the Contractor Safety and Health Guidelines to Northwestern Procurement and Purchasing Services
iv. Ensure all employees, including managers and supervisors, have the proper knowledge and training on the general safety requirements for the project, as well as any task-specific training required
v. Ensure all subcontractors are adhering to their own Safety and Health Program or the general contractor’s Safety and Health Program
vi. Report all incidents to Northwestern Project Managers, Risk Management Services, and OSHA, if applicable
vii. Responsible for contacting the laboratory representative, such as the principal investigator, lab manager, or safety designate, when work involves access into active research laboratory spaces to obtain information such as access restrictions, hazards, laboratory contact information, and any other critical information to ensure the work can be performed safely

B. Northwestern University
i. Project Manager or any Northwestern unit or department who hires a contractor:
a. Responsible for ensuring contractors have an adequate Safety and Health Program for employee protection and accident prevention, compliant with all regulatory requirements
b. Ensure incident reporting procedures are adhered to
c. Notify Risk Management of all incidents, injuries, and near misses
d. Responsible for coordinating with Contractors and Facilities Management Operations when necessary for shutdowns, lockout / tagout, hot work permits, confined space entries, fire system degradations, or any other tasks requiring Facility Management support or intervention
e. Partner with Risk Management Services for EHS concerns and special circumstances requiring additional resources or guidance
f. Responsible for notifying contractors of hazardous conditions and providing site-specific information, such as for confined spaces, asbestos testing, and rooftop anchor certifications

g. Responsible for contacting the laboratory representative, such as the principal investigator, lab manager, or safety designate, when work involves access into active research laboratory spaces to obtain information such as access restrictions, hazards, laboratory contact information, and any other critical information to ensure the work can be performed safely

ii. Facilities Management Operations:
   a. When necessary, execute shutdowns, lockout / tagout, hot work permits, confined space entries, fire system impairments, or any other tasks requiring Facility Management support or intervention
   b. Provide guidance and technical assistance as needed

iii. Procurement and Purchasing Services:
   a. Deliver Contractor Safety Program and Contractor Safety and Health Guidelines to contractors
   b. Ensure contractors read, sign, and return the Contractor Safety and Health Guidelines

iv. Risk Management:
   a. Review, audit, and revise this program and associated Contractor Safety and Health Guidelines as necessary
   b. Provide guidance and technical assistance as needed

IV. Hazardous Waste / Universal Waste

All contractors and subcontractors are responsible for all hazardous and universal waste on projects and work sites. Hazardous and universal waste must be labeled, handled, stored, and disposed of in accordance with applicable regulations. Permitting must be obtained when required and manifest copies must be provided to Northwestern upon request.

V. 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 and subcontractors 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.

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.
VI. Reporting
All contractors and subcontractors are responsible for assisting with 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 or sooner.

VII. Training
All contractor and subcontractor employees, including managers and supervisors, must have the proper training and instruction on general safety requirements for the project, as well as any task-specific training required. Proof of training must be available upon request.

VIII. Safety and Health Guidelines
Contractors are responsible for reading, acknowledging, and signing the Contractor Safety and Health Guidelines and returning it to Northwestern Procurement and Payment Services upon request.

IX. Stop-Work Authority
Northwestern employees have the authority to stop contractor work if unsafe acts or behaviors are observed. Contractors are expected and required to stop work immediately. It is the responsibility of the contractor to take corrective actions to ensure that conditions are safe prior to resuming work.

X. Recordkeeping
Northwestern University, contractors, and subcontractors must follow all regulatory requirements for recordkeeping.

XI. Regulatory Authority
Northwestern University business units, contractors, and subcontractors will comply with Occupational Health and Safety Administration (OSHA), and other applicable codes and standards.

XII. Contact
For questions, contact Risk Management Services, Gwen Butler at gwen.butler@northwestern.edu (847) 491-4936