

Northwestern

Contractor Safety

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 .....	9
VII. Incident Reporting .....	9
VIII. Recordkeeping .....	9
IX. Regulatory Authority.....	9
X. Contact.....	10
Appendix 1 – Contractor Safety Program Reference Index.....	10

## 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 Northwestern's [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 and service providers 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 Northwestern's 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. Contractors must be on Northwestern's [Approved Contractors List](#) prior to conducting activities on campus.
- iv. 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.
- v. Provide a safety representative or designate an individual responsible for addressing worksite EHS concerns.
- vi. Depending on the nature of the work, submit a plan detailing the scope of to Risk Management for review.

- vii. 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.
- viii. Ensure all subcontractors adhere to safety and health requirements.
- ix. 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 hazard information, 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. Maintain the [Approved Contractors List](#).
  - c. Provide guidance and technical assistance as needed, including assistance in reviewing and accepting contractor safety and work plans.
  - d. 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, subcontractors, 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. Anti-idling ordinance**

Contractors must adhere to the City of Evanston's [Anti-Idling Ordinance](#) while on the Evanston Campus and the City of Chicago's [Anti-Idling Ordinance](#) while on the Chicago Campus.

#### **B. Asbestos**

Contractors must adhere to Northwestern's [Asbestos Management](#) program when service, maintenance, or construction activities have the potential to encounter or disturb asbestos containing material (ACM) or presumed asbestos containing material (PACM).

### **C. 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 2 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.

### **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. 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. Cranes and rigging**

- i. Contractor-controlled worksites must develop and implement a crane program that meets or exceeds Northwestern and OSHA requirements.
- ii. Critical crane lift and logistics plans must meet the requirements of Northwestern's [Mobile Crane Critical Lift Operations Checklist](#) and be submitted by Project Managers to Risk Management for review. Critical crane lifts are defined as:
  - a. Hoisting 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. Hoisting sensitive loads;
  - f. Hoisting loads over occupied buildings;
  - g. Hoisting loads outside construction areas; and
  - h. Work involving encroachment on a public right-of-way

### **F. 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. Develop and implement a dust control plan.
- iii. Utilize the appropriate personal protective equipment for dust and particulate related work.
- iv. 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.
- v. Monitor adjacent areas as work proceeds. Modify dust and odor control measures if found to be ineffective.
- vi. When using products with crystalline silica, contractors must have a crystalline silica exposure control plan.

#### **G. Electrical**

- i. All electrical work must be performed de-energized; if not feasible, refer to **Section T – Working on or near live utilities**.
- ii. All electrical work must adhere to Northwestern's [Control of Hazardous Energy \(Lockout/Tagout\)](#) program, where applicable.
- iii. Barrier or guard passageways, mechanical rooms, and other worksites where electrical work is being performed.

#### **H. Fall protection**

- i. Contractors must adhere to Northwestern's [Fall Protection](#) program.
- ii. Establish and implement a fall protection plan, including rescue procedures, 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.

#### **I. 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.

#### **J. Fire prevention**

- i. General
  - a. Contractors must adhere to Northwestern's [Fire Prevention](#) program.
  - b. Provide fire extinguishers appropriate for the conditions and hazards present in construction areas.

- c. Remove all trash and refuse from worksites daily.
  - d. 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.
  - e. 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.
- ii. Hot Work
- a. Contractors must adhere to Northwestern's [Welding, Cutting, and Brazing \(Hot Work\)](#) program.
  - b. 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.
  - c. A signed copy of the permit must be posted near the work site.
  - d. Completed permits must be returned to the Project Manager.
  - e. For renovations or work on existing buildings, coordinate with the Project Manager to verify fire protection systems are operational and available.
  - f. Utilize a trained and competent fire watch with appropriate extinguishers for one hour after the completion of work.

**K. 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.

**L. 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.

**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. Mobile elevated work platforms (MEWPs)**

- i. Contractors must adhere to Northwestern's [Mobile Elevated Work Platform](#) program.
- ii. Operators must be trained and authorized.
- iii. Mobile elevated work platforms must be inspected by the authorized operator prior

- to operation.
- iv. A site risk assessment must be conducted prior to use and must include rescue plans.

**O. Portable ladders**

- i. Contractors must adhere to Northwestern's [Portable Ladder Safety](#) program.
- ii. Responsible for supplying and using their own portable ladders.
- iii. Prohibited from using Northwestern portable ladders.
- iv. Users must be trained, applicable to the work being performed and portable ladder type(s) used.

**P. 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.

**Q. Trenching and excavations**

- i. Notify the Project Manager prior to any trenching or excavation.
- ii. Adhere to all requirements of the [Illinois Underground Utility Facilities Damage Prevention Act](#) and OSHA 1926 Subpart P – Excavations.
- 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 dialing 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.

**R. Water intrusion**

Contractors must adhere to Northwestern's [Water Intrusion](#) guide when responding to and/or are affected by water intrusion events on Northwestern property.

**S. 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 Northwestern's [Office for Research Safety](#) (Evanston campus 847-491-5581) (Chicago campus 312-503-8300) and laboratory representative immediately.

## VII. Incident Reporting

Contractors must reports 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](mailto:chris.yohe@northwestern.edu) or (847) 467-6342.

### Appendix 1 – Contractor Safety Program Reference Index

Content	Website Address
Add Contractor to Contractor Safety Program	<a href="https://www.northwestern.edu/risk/secure/contractor-safety-program-and-expectations-for-visitors-to-campus.html">https://www.northwestern.edu/risk/secure/contractor-safety-program-and-expectations-for-visitors-to-campus.html</a>
Approved Contractors List	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/approved-contractors-list.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/approved-contractors-list.html</a>
Asbestos Management Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/asbestos-management.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/asbestos-management.html</a>
Confined Space Entry Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/confined-spaces.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/confined-spaces.html</a>
Contractor Safety Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/contractor-safety.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/contractor-safety.html</a>
Control of Hazardous Energy (Lockout / Tagout) Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/control-of-hazardous-energy-lockout-tagout.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/control-of-hazardous-energy-lockout-tagout.html</a>
EHS Policy	<a href="https://policies.northwestern.edu/docs/university-ehs-policy-final.pdf">https://policies.northwestern.edu/docs/university-ehs-policy-final.pdf</a>
Fall Protection Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/fall-protection.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/fall-protection.html</a>
Fire Prevention Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/general-work-place-safety/fire-prevention.html">https://www.northwestern.edu/risk/environmental-health-safety/general-work-place-safety/fire-prevention.html</a>
Hazard Communication Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/hazard-communication.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/hazard-communication.html</a>
Hazardous Waste Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/environmental-programs/hazardous-waste.html">https://www.northwestern.edu/risk/environmental-health-safety/environmental-programs/hazardous-waste.html</a>
Incident Investigation Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/general-work-place-safety/incident-investigations.html">https://www.northwestern.edu/risk/environmental-health-safety/general-work-place-safety/incident-investigations.html</a>
Material Handling Equipment Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/material-handling-equipment.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/material-handling-equipment.html</a>
Mobile Crane Critical Lift Operations Checklist	<a href="https://www.northwestern.edu/risk/documents/ehs-documents/facility-docs/mobile-crane-checklist.pdf">https://www.northwestern.edu/risk/documents/ehs-documents/facility-docs/mobile-crane-checklist.pdf</a>
Mobile Elevated Work Platform Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/mobile-elevated-work-platforms.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/mobile-elevated-work-platforms.html</a>
Pending Contractors List	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/pending-contractors-list.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/pending-contractors-list.html</a>
Portable Ladder Safety Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/portable-ladder-safety.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/portable-ladder-safety.html</a>
Water Intrusion Guide	<a href="https://www.northwestern.edu/risk/documents/ehs-documents/environmental-docs/water-intrusion-guide.pdf">https://www.northwestern.edu/risk/documents/ehs-documents/environmental-docs/water-intrusion-guide.pdf</a>
Welding, Cutting, Brazing (Hot Work) Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/welding-cutting-and-brazing.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/welding-cutting-and-brazing.html</a>
Working On or Near Live Utilities Program	<a href="https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/working-on-or-near-utilities-procedures.html">https://www.northwestern.edu/risk/environmental-health-safety/facility-safety/working-on-or-near-utilities-procedures.html</a>