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SAFETY PROGRAM: THIRD PARTY CONTRACTORS

PREAMBLE

Mount Royal University uses third party contractors to provide a wide variety of services to the campus community. Contract work impacts the safety of employees, students and visitors as well as that of contract workers.

This program outlines the requirements and expectations for third party contractors hired to work on University grounds.

SCOPE

This program applies to all third party contractors and all MRU employees that hire third party contractors to perform work on MRU property.

This program does not apply to contract or sessional instructors, short-term contract workers or volunteers, who are all defined as “employees” within the MRU Environmental Health and Safety Management System.

LEGISLATION

Legislative requirements pertaining to contractors are outlined in Part 1, Section 9 (all contractors) and Section 10 (prime contractors) of the Alberta Occupational Health and Safety (OHS) Act.

RESPONSIBILITIES

Please note that the responsibilities listed below are not exclusive and may evolve on a project by project basis. Individuals may have multiple responsibilities on the same project; for example, a Project Manager may also be an MRU Security or EH&S representative. For smaller projects, MRU procurement services may not be involved at all; in these instances, the Project Manager must take on the responsibilities of Procurement Services.

Project Managers

- Schedule the MRU Safety Orientation with all contractors before they arrive to site.
- Obtain contractor ID cards from Security and inform all contractor workers of any security access restrictions, including the authorized use of keys and ID cards.
- Communicate safety expectations to all contractors, including their responsibilities as outlined in this document and under the [MRU Environmental Health and Safety Management System](#). Information can be found on the [EH&S website](#).
- Perform inspections of contractor projects to ensure they are compliant with Alberta OHS legislation and MRU safety requirements.
- Ensure that contractors know to secure work zones appropriately when they are not present in the area.

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- Forward copies of contractor tailgate meetings and/or Field Level Hazard Assessments (or contractor equivalent) to EH&S.
- Establish a working alone check in procedure with any contractors that will be working alone on weekends, after 4:30 pm weekdays, or in restricted access areas at any time. This may include the use of the MRU Now Work Alone application.

Environmental, Health & Safety (EH&S)

- Develop and oversee the MRU Safety Orientation, and provide to contractors when scheduled.
- Review MRU safety expectations with contractors and perform safety inspections of contractor worksites to ensure they remain compliant with Alberta OHS and MRU safety requirements.
- Confirm onsite contractors have required safety certifications when applicable, e.g. WHMIS, hot work, working at heights, or confined space entry.
- When requested, review contractor safety documentation as part of the procurement process and provide assessments to project management staff.

Procurement Services

- Ensure that all contractors maintain the appropriate requirements outlined in Appendix A.
- Provide copies of MRU EH&S programs or procedures that will apply to the project.
- Ensure that contractors have completed any required training requirements for their project and are prepared to present training certificates to the Project Manager or EH&S staff on request.

Security

- Provide contractors with Contractor ID cards when requested.
- Manage annual validity of contractor cards.
- Oversee building access to contractors.
- Confirm that all contractors are aware of the security access restrictions, including restrictions on sharing keys and ID cards.

All Contractors

- Remain compliant with Alberta OHS legislation and MRU EH&S program expectations.
- Sign in and out at Security and complete the MRU Safety Orientation.
- Wear their assigned Contractor ID Card when performing work on campus and return it to Security or the MRU PM when work is complete. Follow Security access restrictions and do not share keys or ID cards.
- Complete Field Level Hazard Assessments (or equivalent) as part of daily tailgate meetings and provide copies of the FLHAs and meetings to their MRU project manager on a weekly basis.
- Ensure that onsite contractor employees are trained and competent and maintain required safety certifications for their tasks.
- Use and provide their own equipment and tools and ensure they are in good working order. Approval of Building Operations Management is required if contractors require use or access to MRU equipment.

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- When applicable, follow the MRU hot work and lockout / tag out procedures and complete MRU hot work training.
- Park in designated areas on campus unless other arrangements have been made by the MRU Project Manager.
- Ensure that exits and emergency equipment (e.g. fire extinguishers, overhead sprinklers, or first aid kits) are kept accessible and not blocked during work
- Maintain a clean work area and ensure that equipment is safely stored when not being used.
- Work within cordoned off work areas making all reasonable efforts to protect the safety of the workers, MRU employees, visitors and students
- Secure the worksite from public access when not present at the work site. This includes removing or securing all hazardous tools and equipment and hazardous chemicals and storing them in secured areas.
- If required to work alone on weekends, after 4:30 pm weekdays, or in restricted access areas at any time, establish a working alone check in procedure with the Project Manager. This may include the use of the MRU Now Work Alone application.
- Follow MRU emergency response procedures and directions, and report all incidents (including close calls or near misses) to the MRU Project Manager.

Prime Contractors

- Post their company name in a clearly visible place at the worksite.
- Ensure that all employees and subcontractors performing work on their designated work site follow the All Contractor responsibilities outlined above, and comply with Alberta OHS legislation and applicable MRU program expectations.
- Share MRU's Contractor Safety Orientation Highlights in daily tailgate meetings and review with any subcontractors and new employees arriving to the site who have not completed the MRU Safety Orientation with EH&S.
- Ensure that all subcontractors are aware of security access restrictions, working alone responsibilities, and expectations for securing unmanned work sites.
- Ensure that any subcontractors brought to site have been prequalified, remain compliant with Alberta OHS legislation, retain valid WCB status and are included in orientations, safety meetings, and incident investigations (as required) while working at MRU.

CONTRACTOR CATEGORIES

Services provided by third party contractors can be grouped into one of the following categories:

- **Major Project Contractors:** Contractors hired to complete capital projects or other projects with significant risk, e.g. new building construction, large renovations / infrastructure changes.
- **Facility Service Contractors:** Contractors hired to complete limited scope projects related to facilities management, e.g. plumbing projects, window repair, IT network repair, repairs to existing facilities and equipment.
- **Program Initiated Contractors/Service Providers – High Risk and/or Long Term:** Contractors hired to provide longer term services (e.g. food services, performances, deliveries) or perform higher risk activities that require specialty equipment and extra attention to the safety of the activity (e.g. field trips).

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- **Program Initiated Contractors/Service Providers – Low Risk and/or Short Term:** Contractors hired to perform short term projects (less than 1 week) or tasks without any significant associated risks, e.g. speakers and presenters (without displays), computer software set up, artists in residence. The complexity, risk and scope of the services provided also varies greatly, including contractual requirements, professional development presentations

For requirements that each category of contractor must meet prior to hire, refer to [Appendix A](#).

Contact Risk Management if there are questions about the category of contractors or specific requirements.

CONTRACTOR SAFETY ORIENTATION

All contractors performing work on MRU property must complete the MRU Contractor Safety Orientation. This is provided by an EH&S Representative on a weekly, scheduled basis. MRU Project Managers must ensure their contractors are scheduled to complete the orientation prior to their arrival on site.

In the event of an emergency repair, EH&S is available for unscheduled orientations on an as-needed basis. MRU Project Managers and Building Operations Supervisors may be authorized to perform the safety orientation for emergency projects occurring outside of normal operating hours.

Prime contractors are required to conduct their own orientation for sub-contractors, and must include key messages provided by the MRU Safety Orientation.

Orientations will include:

- Occupational Health and Safety Requirements
- Emergency Response
- Hazard Assessments
- Incident Reporting and Notification
- Security Access, including signing in / out

HAZARD ASSESSMENT

Contractors, including prime contractors, must complete a hazard assessment as part of their daily tailgate meeting. This hazard assessment will capture any variable hazards present at the work site each day.

When Mount Royal University has prime contractor status a hazard assessment must be performed by the contractor and EH&S (as required) through an assessment of the work site to identify existing and potential hazards that may affect the safety of employees, staff, operations, the public or the environment.

The MRU Project Manager or EH&S may audit the hazard assessments at any time. Copies of the hazard assessments must be submitted to their MRU project manager at least once per week for the duration of the project.

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ENVIRONMENTAL RELEASES & CHEMICAL INVENTORY

All Contractors must:

- Provide chemical Safety Data Sheets (SDS) for each chemical brought on site (to be presented and reviewed as part of the MRU Safety Orientation).
- Must be trained and competent to manage an environmental release and/or the spill of products they are working with.
- Chemical products brought to site by a contractor, their vendors/subcontractors must be removed when no longer required. Chemicals shall never be abandoned by the contractor.
- Chemical products are not to be poured down the drain, storm drain, or sewer system and must be appropriately disposed of by the contractor.
- Report all chemical/oil/fuel spills immediately to Security at 403-440-5900

CONTROLLED ACTIVITIES

Contractors who are performing the following tasks must be prepared to discuss safe work procedures and produce current training certificates during the MRU Safety Orientation. Additional information or work site inspections may be requested by EH&S.

- Work at heights over 3 m / 10 ft
- Work in a confined or restricted space (enclosed or partially enclosed space with limited access/egress, and not designed for continuous human occupancy)
- Work with electrical systems
- Work with hazardous or flammable chemicals or waste materials
- Work with cranes, hoists, or other lifting devices
- Hot Work and the requirement of Hot Work Permitting
- Work with heavy equipment, such as excavators and cranes
- Demolition or excavation

DEFINITIONS

Contractor: An independent legal entity that is engaged in the business of providing work in exchange for payment. An independent legal entity includes an individual, sole proprietorship, partnership or a corporation.

Employee: Volunteers or individuals who are engaged to work for the University under an employment or apprenticeship contract, including Faculty, Staff, exempt Employees, Management Employees, and Undergraduate, Graduate or Postgraduate students carrying out work for the University.

Prime Contractor: A contractor that has been assigned health and safety responsibility for a defined work zone, as outlined in the Alberta Occupational Health and Safety Code.

Project Manager: An employee of MRU who has hired a third party contractor to perform work at the University.

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Subcontractor: A form of contractor that is hired by another contractor (usually the prime contractor) to perform work. Responsibility for the safety of subcontractors lies with the prime contractor for the project.

Supervisor: A person who has charge of a workplace, or authority over a worker. Depending on the particular reporting relationship, a Supervisor includes, but is not limited to any of the following: Manager, Associate Dean, Director, Vice President or President.

Volunteer: Unpaid individual working under the direction of an Employee of the University. Volunteers do not receive course credits or grades, and the work is not a requirement of graduation.

REVISION HISTORY

| Date | Revision | Notes |
|---------------|----------|-------------------------------|
| December 2020 | 01 | Creation of Safe Work Program |

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APPENDIX A: THIRD PARTY CONTRACTOR REQUIREMENTS

Outlined below are the requirements to which each category of third party contractor must adhere.

| MOUNT ROYAL UNIVERSITY GUIDELINES FOR THIRD PARTY CONTRACTORS | | | | |
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| Exceptions to guidelines must be approved by Risk Management. | | | | |
| | Major Projects (Significant Risk and/or Investment) | Facility Service Contractors | Site Initiated Program Support Contractors | |
| | | | A: Higher Risk and/or Long Term | B: Lower risk and/or Short Term |
| Examples | E.g. building of new building, large renovations | E.g. plumbing projects, window repair | E.g. higher risk activities, field trips, performances | E.g. speakers, artists in residence |
| Requirements Prior to Receiving Contract | <ul style="list-style-type: none"> ● WCB coverage ● Minimum \$10,000,000 CGL w/ MRU named as additional insured w/ 30 day written notice of cancellation coverage ● GST # ● Business License ● COR ● \$2,000,000 Auto TPL coverage | <ul style="list-style-type: none"> ● WCB coverage ● Minimum \$5,000,000 CGL w/ MRU named as additional insured w/ 30 days written notice of cancellation coverage ● GST # ● Business License ● COR or Acceptable Health & Safety Program ● \$2,000,000 Auto TPL coverage | <ul style="list-style-type: none"> ● WCB coverage ● Recommended \$5,000,000 CGL coverage insurance (can be waived/modified with Risk Services approval) ● Review of Contractor Health and Safety Information and Acknowledgement Sheets with contractor/ service provider | <ul style="list-style-type: none"> ● Minimum \$2,000,000 CGL coverage insurance (can be waived/modified with Risk Services approval) ● Review of Contractor Health and Safety Information and Acknowledgement Sheets with contractor/ service provider |

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| | Major Projects (Significant Risk and/or Investment) | Facility Service Contractors | Site Initiated Program Support Contractors | |
|--|--|--|---|---|
| | | | A: Higher Risk and/or Long Term | B: Lower risk and/or Short Term |
| Requirements Once Contract Issued | <ul style="list-style-type: none"> ● Regular safety meetings ● Completion of initial checklist ● Safety Orientation ● Written hazard assessments ● Emergency Response Plan for site ● To monitor and ensure compliance of University EHS standards. ● Only personnel with University identification will be allowed access to University facilities. ● All contractors and contractor personnel must sign in with Security prior to commencing work on University Property, or if the site is separate, the prime contractor must ensure sign in occurs. | <ul style="list-style-type: none"> ● Regular safety meetings ● Completion of initial checklist ● Safety Orientation ● Written hazard assessments ● Emergency Response Plan for site ● To monitor and ensure compliance of University EHS standards. ● Only personnel with University identification will be allowed access to University facilities. ● All contractors and contractor personnel must sign in with Security prior to commencing work on University Property | <ul style="list-style-type: none"> ● N/A | <ul style="list-style-type: none"> ● N/A |

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| | Major Projects (Significant Risk and/or Investment) | Facility Service Contractors | Site Initiated Program Support Contractors | |
|------------------------------|--|---|--|--|
| | | | A: Higher Risk and/or Long Term | B: Lower risk and/or Short Term |
| Possible Requirements | <ul style="list-style-type: none"> Act as prime contractor of Site Environmental Management Plan Additional Insurance as needed Architects and Engineers require \$5,000,000 in professional liability insurance | <ul style="list-style-type: none"> May be required to assume prime contractor status. Environmental Management Plan Additional Insurance as needed Architects and Engineers require \$5,000,000 in professional liability insurance | <ul style="list-style-type: none"> Minimum \$2,000,000 in liability insurance Additional Insurance as needed Architects and Engineers require \$5,000,000 in professional liability insurance | <ul style="list-style-type: none"> WCB account in good standing Additional Insurance as needed Architects and Engineers require \$5,000,000 in professional liability insurance |