

# Fraser Health Contractor Safety Program

PUBLIC VERSION

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**Note:**

There are several documents provided in the Appendix section as reference material. All these documents are also referenced with a specific hyperlink. Documents contained in hyperlinks and/or other electronic versions on Fraser Health systems are to be considered the most current version.

Hyperlinks in this document are only accessible through the Fraser Health network. If you are within the network but do not have an electronic copy, or if you are outside the Fraser Health network, please contact Workplace Health.

**DOCUMENT HISTORY**

Version	Date	Summary of Key Changes
1.0	June 15, 2018	Full Revision

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## 1. STATEMENT OF PURPOSE

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Fraser Health is committed to providing a safe and healthy workplace. Fraser Health will enhance the health of our people and workplaces through health promotion, injury/disease prevention and positive workplace strategies.

The Fraser Health Contractor Safety Program defines the processes and responsibilities for ensuring the safety of non-Fraser Health workers at its sites.

## 2. SCOPE

The Contractor Safety Program applies to all employers and workers at Fraser Health sites and parties responsible for procuring contractors to perform work at Fraser Health sites.

### 2.1 Applicable Regulations and Standards

- General Duties of employers, workers, supervisors, prime contractor, owners and others are provided in Part 3, Division 3, Sections 115 to 124 of the [Workers Compensation Act](#).
  - Policy item D3-115-1 explains the employer's duty towards other workers.
  - Policy item D3-118-1 explains the general duties regarding multiple-employer workplaces.
  - Guideline G-D3-124 explains the responsibilities of person/parties in the workplace.
- Accident Reporting and Investigation requirements are provided in Part 3, Division 10, Sections 172 to 177 of the Workers Compensation Act.
- Requirements for Safety Programs are provided in Part 3 of the [Occupational Health & Safety Regulation](#).

## 3. ROLES AND RESPONSIBILITIES

### 3.1 Owner

Fraser Health as the owner is responsible for:

- a) Providing and maintaining the land and premises that are being used as a workplace in a manner that ensures the health and safety of persons at or near the workplace.
- b) Providing to the employer or the prime contractor at the workplace, information known to the Owner that is necessary to identify and eliminate or control hazards to the health or safety of personnel at the workplace.
- c) Complying with Part 3, Division 3 of the Workers Compensation Act.

### 3.2 Prime Contractor

Fraser Health will act as prime contractor for all its owned workplaces unless this designation has been delegated and expressly stated in written form.

The Prime Contractor is responsible for ensuring that:

- a) Activities of employers, workers and other persons at the workplace relating to occupational health and safety are coordinated, and
- b) Due diligence is exercised in establishing and maintaining programs and systems to enable compliance with the Workers Compensation Act and the Occupational Health and Safety Regulation.

### 3.3 Fraser Health Leadership

Fraser Health Leadership will ensure:

- a) The Multi-Employer Safety Team representing key stakeholders at Fraser Health sites is maintained as a forum for problem-solving safety and cross-operational issues.
- b) Processes for procuring consultants/contractors are established and maintained.
- c) Processes for consultants/contractors to report to an assigned Contract/Project Manager are established and maintained.

### 3.4 Fraser Health Department Managers

When procuring consultants/contractors, Fraser Health Department Managers will:

- a) Follow established Fraser Health procurement processes.
- b) Act as Contract/Project Manager to ensure activities of the consultant/contractor related to health and safety are coordinated per [Section 3.6-Contract/Project Manager](#) of this program, or ensure a Contract/Project Manager is assigned.

In general, Fraser Health Department Managers will collaborate with Contract/Project Managers by:

- a) Providing department specific safety hazard and control information to Contract/Project Managers per [Section 5 –Hazard Identification and Assessment](#) of this program.

NOTE: Fraser Health Site Facilities Maintenance and Operations is responsible for providing safety hazard and control information related to Fraser Health owned building structures and/or materials.

- b) Following [Section 8.4-Incident Investigations](#) of this program with regards to investigating workplace incidents when either Fraser Health's or a Contractor's work adversely affects either party.
- c) Following [Section 8.5-Hazard Reporting and Resolution](#) of this program with regards to investigating and resolving reported hazards when either Fraser Health's or a Contractor's work adversely affects either party.

### 3.5 BC Clinical Support Services Society, Business Initiatives and Support Services, and Facilities Management-Real Estate, Leasing and Property Management

Prior to leasing space within, or granting access to, Fraser Health owned sites, BC Clinical Support Services Society, Business Initiatives and Support Services, and Facilities Management -*Real Estate, Leasing and Property Management* are responsible for ensuring that both Fraser Health Site Administration and Facilities Maintenance and Operations are consulted to identify: safety hazards inherent to the applicable spaces, specific requirements for safe access, and requirements for safe coordination of work activities.

### 3.6 Fraser Health Contract/Project Manager

The responsibilities of Contract/Project Managers are to ensure:

- a) Tasks outlined in [Section 4-Contractor Procurement](#) are completed.
- b) Tasks outlined in [Section 5-Hazard Identification and Assessment](#), [Section 6-Hazard Control](#), [Section 7-Education and Training](#), [Section 8-Safety Requirements](#), and [Section 9-Documentation/Record Keeping](#), are completed as applicable.
- c) Requirements and Procedures outlined in Section 5-Hazard Identification and Assessment, Section 6-Hazard Control, Section 7-Education and Training, Section 8-Safety Requirements, and Section 9-Documentation/Record Keeping are implemented and monitored for the duration of the contract/project.
- d) The *Contractor Safety Checklist* Part A and B is completed and regularly updated to reflect changes in the safety hazards and controls, and/or Contractor Occupational Health & Safety (OH&S) Representative contact information.
- e) Fraser Health Workplace Health is included as a stakeholder at the start of all contracts/projects
  - i. valued at greater than \$50,000 or
  - ii. where asbestos, falls from height, or confined space entry is listed as a hazard regardless of the contract value.

The Contract/Project Manager may delegate tasks to others; however, the overall responsibility remains with the Contract /Project Manager.

### 3.7 Contractors

Contractors are responsible for ensuring:

- a) The Contract/Project Manager is notified of any safety hazards the contractor's work may pose to the site and/or other workers on the site.
- b) The Contract/Project Manager is provided with the contact information for the person assigned to oversee the contractor's OH&S activities (Contractor OH&S Representative as identified on the *Contractor Safety Checklist*)
- c) Their workers and sub-contractors comply with instructions and requirements provided in the *Information for Contractors While Working at Fraser Health Sites*.
- d) Their Safety Programs contain elements as outlined in [Section 5- Hazard Identification and Assessment](#), [Section 6-Hazard Control](#), [Section 7-Education and Training](#), and [Section 8-Safety Requirements](#)
- e) Appropriate Notice of Project- Construction/Asbestos/Lead form(s) are filled out and sent to WorkSafeBC.

### 3.8 Fraser Health Workplace Health

The responsibilities of Fraser Health Workplace Health are to ensure:

- a) Contract/Project Managers are supported in application of the Contractor Safety Program.
- b) Effectiveness of the Contractor Safety Program is monitored.
- c) Applicable Contractor Safety Program documentation is completed by participating in contract start up meetings for all contract/projects
  - i. Valued at greater than \$50,000 or



- ii. Where asbestos, falls from height, or confined space entry is listed as a hazard regardless of the contract value.
- d) Contractor Safety Program is maintained.

### **3.9 Multi-Employer Safety Team (MEST)**

The Multi-Employer Safety Team representing key employers and stakeholders at Fraser Health sites is responsible for meeting regularly to communicate hazards and problem-solve safety and cross-operational issues that potentially impact multiple employers at Fraser Health sites.

### **3.10 Fraser Health Site Joint Occupational Health and Safety Committee (JOHSC)**

The Fraser Health site JOHSC is responsible for making recommendations towards the improvement of the Fraser Health Contractor Safety Program.

### **3.11 Fraser Health Infection Prevention and Control**

Fraser Health Infection Prevention and Control is responsible for participating as requested in the review of the Contractor Safety Program.

## **4. CONTRACTOR PROCUREMENT**

Contractors/Consultants must be procured through the appropriate procurement representative. Lower Mainland Facilities Management (LMFM) manages procurement of consultants for planning, programming, design and construction of facilities and infrastructure. BC Clinical and Support Services (BCCSS) Society manages procurement of all non-construction consultants. Business Initiatives and Support Services (BISS) manages contracts for support services (food, housekeeping, environmental, laundry, waste management, and patient transportation (non-BC Ambulance)).

Procurement Process:

1. Contract/Project Manager to create a multidisciplinary group with key stakeholders if applicable.
2. Contract/Project Manager to assess hazards and complete Part A of the *Contractor Safety Checklist*. Key stakeholders may be consulted to ensure accuracy.
3. Contract/Project Manager to send completed Part A of the *Contractor Safety Checklist* to procurement representative.
4. Contract/Project Manager to determine if a site tour is required and place details in the solicitation documents.
5. Contract/Project Manager ensures that hazard identified in the *Contractor Safety Checklist* and *Infection Control Risk Assessment* information is placed into solicitation documents (Request for Proposal tender, direct awards, quote requests).
6. Contract/ Project Manager to ensure that package is communicated to contractors (i.e. BC Bid) either through BCCSS, BISS or LMFM procurement and amended as required dependent upon site investigations.
7. Procurement representative to receive contractor responses then collaborate with the Contractor/Project Manager.
8. Procurement representative to review submissions with Contract/Project Manager and determine successful bidder.

9. Procurement representative to draw up the contract, ensuring that all appropriate hazard identification and information and program/policy requirements are either in the contract or that the *Contractor Safety Responsibilities Sign-Off Form* is utilized. Ensure all documents are signed off and WSBC coverage is current.
10. Prior to commencement of work, the Contract/Project Manager will hold a start-up meeting to:
  - Review the *Information for Contractors While Working on Fraser Health Sites*,
  - Discuss any hazards identified as necessary,
  - Clarify specific Fraser Health procedures that must be followed,
  - Establish processes (hazard reporting, emergency, stop work and first aid),
  - Provide keys, access, Identification.

## 5. HAZARD IDENTIFICATION AND ASSESSMENT

Contractors need to be oriented to hazards intrinsic to Fraser Health sites, and Fraser Health needs to be knowledgeable of hazards that may be introduced to its sites through Contractor's work. General hazards intrinsic to Fraser Health sites are outlined in the *Information for Contractors While Working at Fraser Health Sites* handbook and on the *Contractor Safety Checklist*. The *Contractor Safety Checklist* also outlines common Contractor generated hazards that may be introduced to Fraser Health sites.

### 5.1 Completion of the Contractor Safety Checklist-Hazard Identification

- The Contract/Project Manager must complete the *Contractor Safety Checklist* in consultation with individuals knowledgeable about the:
  - Hazards intrinsic to the Fraser Health site.
  - Scope of contracted work.
  - Hazards that may be introduced to Fraser Health as a result of the contracted work.
- The completed form must be retained by the Contract/Project Manager.

## 6. HAZARD CONTROL

Hazard control is an employer responsibility. Plans to control identified hazards must be implemented prior to work being undertaken.

### 6.1 Completion of the Contractor Safety Checklist-Hazard Control

- The Contract/Project Manager must ensure that suitable plans to control identified hazards are implemented in consultation with stakeholders. ((*Appropriate stakeholders may include Fraser Health site Facilities Maintenance and Operations, Client Partner: Safety and Prevention and/or the Contractor's safety resources*)
- The controls should be noted on the *Contractor Safety Checklist*.

## 6.2 Hierarchy of Controls Information

The following information highlights the hierarchy of controls to minimize risk. While the controls are listed in order of effectiveness, all four types of controls should be considered.

### 6.2.1 Elimination or Substitution

Eliminating the hazard completely is always the first choice. Substitution involves replacing the material or process with a less hazardous one.

### 6.2.2 Engineering Controls

If hazards can't be eliminated or substituted, engineering controls are the next best options. Engineering controls are physical changes to the workplace or equipment that prevent workers from being exposed to a hazard.

### 6.2.3 Administrative Controls

Administrative controls involve identifying and implementing safe work procedures so workers can perform their job duties safely.

### 6.2.4 Personal Protective Equipment and Clothing

Where engineering controls or administrative controls alone don't provide adequate protection for a worker, personal protective equipment (PPE) provides the last layer of protection. *(For example: A worker assigned to drill concrete may be provided with equipment designed to capture dust at the source-Engineering Control, work procedures for wetting the concrete to reduce dust-Administrative Control, and also be required to wear protective eyewear, gloves and a respirator for added protection against exposure to silica-Personal Protective Equipment and Clothing).*

## 7. EDUCATION AND TRAINING

All workers must be oriented to their responsibilities, site safety hazards, reporting processes and emergency procedures prior to being assigned work at Fraser Health sites.

### 7.1 Contract /Project Managers

- a) Contract/Project Managers should be familiar with Fraser Health administrative policies applying to Contractors.
- b) Contract/Project Managers should be familiar with Fraser Health Emergency Codes/Procedures.
- c) Contract/Project Managers must complete the following mandatory online education:
  - Contract/Project Manager
  - Occupational Health and Safety for Managers-Fraser Health
  - Incident Investigation

### 7.2 Contractor

- a) Contract/Project Managers must provide the Contractor with the following documents/information:

- Fraser Health Site [emergency response](#) and [first aid procedures](#), as applicable.
  - Site orientation per *Contractor Safety Checklist* and *Information for Contractors Working at Fraser Health Sites*, and applicable controls and procedures.
  - Fraser Health Administrative Policies, as applicable.
  - Fraser Health Contractor Safety Program.
- b) The Contractor must provide their workers and sub-contractors with the following information/orientation:
- Site emergency response and first aid procedures.
  - Site orientation per *Contractor Safety Checklist* and *Information for Contractors Working at Fraser Health Sites*, applicable Fraser Health Policies, and applicable controls and procedures.
  - Applicable training to perform their work safely (i.e. WHMIS, lockout, confined space entry, fall protection).

## 8. SAFETY REQUIREMENTS

The following outlines Fraser Health’s expectations for Contractors performing work at Fraser Health workplaces and for Contract/Project Managers overseeing the coordination of contractor safety. Contractor’s safety programs will be in compliance at minimum with Part 3 of the Occupational Health & Safety Regulation and Part3, Division 10, Sections 172 to 177 of the Workers Compensation Act.

### 8.1 Joint Occupation Health & Safety Committee/Safety Representative

Contractors regularly employing workers at a Fraser Health workplace will comply with the Workers Compensation Act Part 3, Division 4-Joint Committees and Worker Representative.

Names and work locations of the joint committee members, 3 most recent joint committee meeting reports, and copies of any applicable orders must be posted at the workplace.

### 8.2 Safety Inspections

Contractors are responsible for inspecting their work areas and work activities at intervals that will prevent the development of unsafe working conditions. The scope or duration of work may regulate the frequency of these inspections.

Copies of inspections must be available onsite for review by WorkSafeBC and /or the Contract /Project Manager.

### 8.3 First Aid

Contractors working at a Fraser Health workplace are responsible for the development and implementation of their own occupational first aid program and services, including rescue plans for work areas that are not easily accessed. Any circumstances where Fraser Health will provide first aid services will be outlined in Fraser Health’s First Aid Assessment for the specific site, or by written agreement.

Where there is an agreement that Fraser Health will provide first aid services, the Contractor is responsible for communicating the procedure to their workers. In general, workers need to be informed of the following:

- Report to the Fraser Health site first aid attendant (must be specific to site).

- State the company name, and that they have been injured while working at the Fraser Health facility.
- Ask for a photocopy of the First Aid Record and provide it to their supervisor. (The original First Aid Record is maintained in the Fraser Health site first aid binder.)

## 8.4 Incident Investigations

Each employer is responsible for establishing and maintaining a process for promptly investigating and documenting incidents and near misses. The Workers Compensation Act Part 3, Division 10 Sections 172 to 177 identifies incidents that need to be investigated, incidents that need to be reported immediately to WorkSafeBC, the process for conducting investigations and requirements for completing reports.

Criteria for immediate reporting to WorkSafeBC, and preservation of the scene:

- Resulted in serious injury to or the death of a worker,
- Involved a major structural failure or collapse of a building, bridge, tower, crane, hoist, temporary construction support system or excavation,
- Involved the major release of a hazardous substance,
- Involved a fire or explosion that had a potential for causing serious injury to a worker.

### *8.4.1 Incident Investigation Communication when a Contractor's activities adversely affect their own workers, property/equipment only*

- a) Where an incident meets the requirement for investigation, the contractor will:
  - Complete a preliminary investigation report within 48 hours.
  - Provide a copy of the preliminary or final investigation report to the Contract/Project Manager or WSBC as requested.
  
- b) Where an incident meets the criteria for immediately reportable incidents, additional communication is required
  - i. The Contractor must:
    - Report the incident to the Contract/Project Manager.
    - Provide a copy of the final investigation report to the Contract/Project Manager.
  
  - ii. The Contract/Project Manager will:
    - Inform Site Leadership of the incident and investigation results.
    - Maintain a copy of the final investigation report in the contract/project file.

### *8.4.2 Incident Investigation Communication when a Contractor's activities adversely affect other employer's workers, property/equipment*

- a) Where an incident meets the requirement for investigation
  - i. Each affected party must:
    - Immediately inform the Contract/Project Manager.
    - Complete a preliminary investigation report from their perspective, within 48 hours, in consultation with management representative(s) of the

- affected employers, and other stakeholders as required.
  - Provide a copy of the investigation report to the Contract/Project Manager.
- ii. The Contract/Project Manager will:
- As needed, inform appropriate Site Leadership of the incident.
  - Coordinate meetings between the Contractor, affected employers and other stakeholders to enable the parties to complete their respective incident investigations/implement corrective actions. (*Appropriate stakeholders may include Fraser Health site Facilities Maintenance and Operations, Client Partner: Safety and Prevention, Infection Control and/or the Contractor's OH&S Representative*)
  - Communicate final reports to appropriate stakeholders.
  - Maintain copies of the final investigation reports in the contract/project file.
- b) Where an incident meets the criteria for immediately reportable incidents, additional communication is required
- i. The Contractor must:
- Inform their respective Safety leadership of the incident.
- ii. The Contract/Project Manager will:
- Inform the Fraser Health Client Partner: Safety & Prevention of the incident.
  - Inform Site Leadership of the incident and investigation results.

#### *8.4.3 Incident Investigation Communication when Fraser Health's activities adversely affect other workers, property/equipment*

Fraser Health will follow a reciprocal process.

### **8.5 Hazard Reporting and Resolution**

Recognized hazards need to be reported before accidents or injuries occur. Hazard reporting is a proactive and preventative safety activity. Part 3, Division 3, Section 116 of the Workers Compensation Act requires that workers report hazards to their supervisor or employer. All workers are expected to follow the hazard reporting process as outlined in their employer's safety program.

The general steps for reporting any serious and immediate hazard are:

1. Remedy or lessen the hazard if it is safe to do so.
2. Identify the hazard clearly to warn others.
3. Report the hazard immediately to your supervisor or manager.

The supervisor or manager is responsible for ensuring the hazard is resolved.

### 8.5.1 Hazard Communication within the Contractor's operations

Contractors will establish and maintain a process for hazard reporting and documenting corrective actions involving their workers and operations. The contractor will utilize their safety resources to resolve the concern.

If the resolution of the hazard will affect the terms of the contract, the contractor must immediately report the condition and proposed course of action to the Contract /Project Manager.

Hazard reports will be maintained by the contractor and be made available for review by WorkSafeBC and the Contractor/Project Manager upon request.

### 8.5.2 Hazard Communication outside the Contractor's operations/control

Upon receipt of a hazard report concerning activities outside of its operations

- i. The Contractor must:
  - Provide a copy of the hazard report to the Contract/Project Manager.
- ii. The Contract/Project Manager will:
  - Review the hazard report with the Contractor and appropriate stakeholder(s) within 24 hours. (*Appropriate stakeholders may include Fraser Health site Facilities Maintenance and Operations, Client Partner: Safety and Prevention and/or the Contractor's OH&S representative*).
  - Complete a Fraser Health *Workplace Hazard Resolution Plan* with input from the Contractor and appropriate stakeholders within 72 hours.
  - Provide a copy of the Hazard Resolution Plan to the Contractor, appropriate stakeholder(s), and site JOHS Committee.
  - Maintain the hazard report and Hazard Resolution Plan in the contract/project file.

### 8.5.3 Hazard Communication from Fraser Health

Fraser Health will follow its established hazard reporting process, using the *Hazard Report Form* in a reciprocal process.

## 8.6 WorkSafeBC Site Inspections

Depending on the workplace, the WorkSafeBC officer should check in with the Site Administration. The Site Administration will contact the Contract/Project Manager, the Client Partner-Prevention and/or the applicable employer's onsite management representative.

This arrangement may not always be suitable to the situation, and WorkSafeBC may go directly to the area where the Contractor has workers at the Fraser Health site.

The Contractor should inform the Contract/Project Manager of any WorkSafeBC site inspection, especially if during the inspection the officer has concerns regarding activities overlapping Fraser Health, or other employers on the Fraser Health site.

The Contract/Project Manager should inform the Fraser Health Client Partner-Prevention of WorkSafeBC's visit and concerns, and provide a copy of any Inspection Reports/Orders involving Fraser Health.

## **9. DOCUMENTATION/RECORD KEEPING**

A number of forms must be completed during the administration of a contract. Documentation will be maintained per departmental procedure by the Contract/Project Manager. Applicable documents are listed below:

- a) Workplace Hazard Report Form
- b) Hazard Resolution Plan
- c) Contractor Safety Responsibilities Sign-off Form
- d) Contractor Safety Checklist
- e) Infection Control Risk Assessment
- f) Contractor Safety Programs and Procedures
- g) Established processes (Hazard Reporting, Emergency, Stop Work and First Aid)

## **10. PROGRAM EVALUATION**

This program will be evaluated by Workplace Health on an ongoing basis to ensure compliance with applicable regulations and standards.



## APPENDICES

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### **Appendix A: Contractor Safety Checklist**

The *Contractor Safety Checklist* is available for download from [FHPulse](#) – Workplace Health and Safety/Safety and Prevention-SAFETY, Contractor Safety.

### **Appendix B: Information for Contractors While Working on Fraser Health Sites**

The handbook “Information for Contractors While Working on Fraser Health Sites” is available for download from [FHPulse](#).

### **Appendix C: Infection Control Risk Assessment Form**

The *Infection Control Risk Assessment Form* is available from [Fraser Health Infection Prevention and Control](#).

### **Appendix D: Contractor Safety Responsibilities Sign-off Form**

The *Contractor Safety Responsibilities Sign-off Form* is available for download from [FHPulse](#) – Workplace Health and Safety/Safety and Prevention-SAFETY, Contractor Safety.

### **Appendix E: Fraser Health Administrative Policies Applicable to Contractors**

Fraser Health Administrative Policies are available for download from [FHPulse](#).

- Access Control
- Alcohol and Drug Use
- Fire Safety
- Emergency Management and Business Continuity
- Escalation and Management of Significant Adverse
- Events and Service Issues
- Hand Hygiene
- Identification
- Independent Consultant Contracts
- Influenza Control Program
- Information Security Policy
- Parking Facilities Management
- Reducing Natural Rubber Latex Exposure
- Respectful Workplace
- Scented Products
- Smoke Free
- Theft, Fraud, and Corruption
- Workplace Health and Safety

### **Appendix F: Hazard Resolution Plan**

The Fraser Health *Hazard Resolution Plan* form is available for download from [FHPulse](#) – Workplace Health and Safety/Safety and Prevention-SAFETY, Hazard Reporting.

### **Appendix G: Workplace Hazard Report Form**

The Fraser Health *Workplace Hazard Report Form* is available for download from [FHPulse](#) – Workplace Health and Safety/Safety and Prevention-SAFETY, Hazard Reporting.

