

Contractor Oversight Responsibilities in an SMS

Implementing a safety management system (SMS) ensures an organization provides all employees, including contractors, a safe and healthful workplace – with the overall goal of ensuring contractors receive the same protection as other employees.

The purpose of contractor oversight is to encourage contractors to effectively execute their own safety and health (S&H) programs in order to maintain S&H in your workplaces.

Contractor oversight calls for worksites to have contractor selection and monitoring processes in place. Unsafe contractors may expose their own employees, as well as site employees, to unsafe acts or conditions. This detail makes contractor oversight essential for a safe work environment. It is important for the site to maintain a good working relationship with contractors and to encourage cooperation during oversight activities with contractor employees.



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PRIOR TO THE START OF WORK

1. Include appropriate S&H provisions in contracts, which require your contractor to:
 - Follow all applicable federal (e.g., Occupational Safety and Health Administration [OSHA]), state, and local regulations, as well as any applicable DoD, Service or Agency, and other site-specific S&H rules and requirements
 - Develop a written, site-specific S&H program (with approval prior to work)
 - Identify and eliminate or control contractor-created S&H hazards
 - Train contractor employees on S&H hazards, rules, and requirements
 - Inspect and audit S&H performance
 - Report OSHA recordable injuries and illnesses and submit on-site injury and illness information to the host site
 - Meet periodically with the host site to review S&H performance
 - Remove contractor employee(s) for S&H violations.
2. Consider past S&H performance during the contractor selection process.
 - Refer to [DoD Best Practices for Optimizing DoD Contractor Safety and Occupational Health Performance \(Version 1.0\), A Guide for Contracting, Legal and Safety and Occupational Health Professionals.](#)

3. Hold pre-contract commencement meetings with host site representatives to:
 - Discuss the contractor oversight program
 - Review S&H rules and expectations on-site
 - Ensure contractors are aware of emergency procedures
 - Ensure contractors are aware of injury, illness and mishap reporting procedures.



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DURING ON-SITE CONTRACTOR PERFORMANCE

1. Assess contractor workspaces to ensure the contractor:
 - Provides a safe and healthful workplace for all employees
 - Follows their S&H plan and the site's S&H rules
 - Identifies and corrects S&H hazards created by contract work
 - Reports mishaps and near-misses in a timely manner.
2. Request contractor injury and illness rates annually:
 - Compare their rates against their respective industry average
 - Work with contractors to develop rate reduction plans, if needed
 - Ensure contractors address the causes of injuries and illnesses.
3. Communicate the need for site employees and contractors to notify the safety office if they observe unsafe acts or conditions in contract work areas.



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POST-PERFORMANCE EVALUATION

1. Review and rate contractor S&H performance for the contract period.
2. Consider creating a list of contractors who maintain great S&H performance ratings.
3. Identify lessons learned to improve the contractor oversight process.

For additional information on the SMCX's services, please visit the SMCX-hosted website at: <https://www.smcx.org/>.