

# 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 encouraging contractors to improve their own safety and health, in order to maintain safety and health in your workplace.

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 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 safety and health provisions in contracts, which require the contractor to:
  - Follow all applicable federal (e.g., Occupational Safety and Health Administration [OSHA]), state, and local regulations, as well as DoD, Service or Agency, and other site-specific safety and health rules and requirements
  - Develop a written, site-specific safety and health program (with approval prior to work)
  - Identify and eliminate or control contractor worksite hazards
  - Train contract employees on safety and health hazards, rules, and requirements
  - Inspect and audit safety and health 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 safety and health performance
  - Remove a contractor or contractor's employees for safety and health violations
2. Consider past safety and health 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 safety and health 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 safety plan and the site's safety rules
- Identifies and corrects hazards created by contract work
- Reports mishaps and near-misses in a timely manner
- Identifies root causes and causal factors for contractor mishaps



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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

## POST-PERFORMANCE EVALUATION

1. Review and rate contractor safety and health performance for the contract period
2. Consider creating a list of contractors who maintain great safety and health performance
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/>.