

National Manual for Assets and Facilities Management Volume 10, Chapter 2

Health & Safety Compliance Assessment Procedure

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Health & Safety Compliance Assessment Procedure

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Health & Safety Compliance Assessment Procedure

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1.0 PURPOSE

Selection of suitably competent, qualified and experienced contractors to undertake O&M service delivery is a critical element in ensuring the long term life of the built 'assets'. However, in regards to effective O&M service delivery, compliance with Health & Safety, (H&S) legislation, regulations, policies and procedures, on a daily basis by assigned contractors is a priority.

The purpose of this procedure is to establish a standard approach to monitoring compliance against defined, H&S criteria for those O&M Contractor(s), sub-contractors and specialist service providers commissioned by the Entity. This procedure will describe the requirements for a Health & Safety assessment process/compliance audit and monitoring program that help the Entity's HSE Representative to ensure that a safe working environment is maintained for staff, contractor personnel, and other stakeholders. At all times safe working practices should be maintained by the contractor when undertaking the daily Operations & Maintenance work activities.

2.0 SCOPE

The scope of this procedure covers those activities associated with the identification of risk, compliance and monitoring criteria in respect of Health and Safety H&S, and O&M service delivery. In regards to the evaluation and selection of Contractors, any references in this plan aligns with those processes under Volume 9 of the National Manual of Assets and Facilities Management. This procedure applies to O&M works performed under all O&M Contracts let by Government Entities executed throughout the Kingdom of Saudi Arabia. A separate procedure for environmental compliance evaluation has been developed (Refer to EOM-KSE-PR-000004 Environmental Compliance Evaluation Procedure).

3.0 DEFINITIONS

Definitions	Description
Accident	An incident that occurs unexpectedly or unintentionally that typically gives rise to injury to person or persons; damage to property or other objects or to the environment. (In the context of O&M, an accident can be construed as an unplanned event that has resulted in or suggests the failure of a safety system, barriers, or loss of controls). Depending on the seriousness of the accident, this may require formal intervention by emergency services, formal investigation and documented evidence).
Accountability	The ultimate responsibility for an area of authority defined by the individual's job description, and includes authority delegated to a subordinate either temporary or permanent.
Contractor	The Company commissioned by the Entity under contract to deliver an agreed scope of services, goods or materials as per the agreed price and specific contract conditions.
H&S	Health & Safety
Hazard	An object, physical effect, or condition with the potential to harm people, property or the environment.
HS Assessment Process	A method used for gathering reliable data through inspection, observation, and inquiry to identify program strengths as well as opportunities for improvement.
HSE	Health, Safety, & Environment
Incident	Any occurrence, event or series of events which results in injury to any person, damage to equipment, plant, or environment.
JHA	Job Hazard Analysis
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
Risk	The product of the chance that a specific undesired event will occur and the severity of the consequences of the event.



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Definitions	Description
Risk Assessment	An evaluation of exposure to potential loss, which can be quantitative. Not to be construed as a formal regulatory definition.
STARTR	Safety Task Analysis and Risk Reduction Talk.
Toolbox Talks / Pre job briefing	Task based induction or job start training undertaken by HSE representative or Supervisor, prior to work commencing and held with those personnel to whom the task is assigned to complete.
WMS	Work Method Statement

4.0 REFERENCES

- OSHA 29CFR 1910 Occupational Safety and Health Standards.
- OSHA 29CFR 1926 Safety and Health Regulations for Construction.
- EOM-KSS-PR-000001 General Safe Working Requirement Procedure
- EOM-KSS-PR-000010 Night Work Procedure
- EOM-KSH-PR-000003 Occupational Health Records Maintenance System Procedure

5.0 RESPONSIBILITIES

5.1 Asset & Facility Manager or Responsible Contractor

The Asset & Facility Manager is responsible for ensuring the resources and arrangements are available for the implementation and management of this procedure and ensuring compliance with the Health, Safety, and Environment HSE requirements. Responsibilities include allocating sufficient resources to implement, develop, and maintain Health & Safety compliance monitoring throughout the Operations & Maintenance activities (Table 1). This will include ensuring maintenance of accurate and up to date records and reporting on HSE matters including the findings of all assessments undertaken.

Assessment / Audit Type	Participants	Frequency
Inspection/Assessment (monitoring/oversight)	Contractor, Site Manager, Superintendents, HSE Supervisors and HSE Advisors	Daily
Night Work Inspections	Contractor HSE Advisors, Contractor and Responsible Entity Superintendents	Daily
Inspections (Safety Focus)	Area Contractor and Responsible Entity Superintendents and HSE Supervisors	Weekly
Inspections (Health and Hygiene Focus)	Contractor Industrial Hygiene Supervisor, Contractor Occupational Health Coordinator, Responsible Entity Operations Manager, Area Contractor and Responsible Entity Superintendents, Contractor Camp Manager	Weekly
Safety Absolutes Checklist	Contractor Site Management and Superintendents, Contractor HSE Advisors, Company Site Manager, Company HES Manager	Weekly
Site Manager's Weekly Site Walk-down (Inspection)	Contractor Site Manager, Company Site Manager, Contractor HSE Manager and Advisors, Company HSE Manager and Team Leads, Responsible Entity Management and HSE, Contractor Engineers and Department Reps	Weekly
Inspections (Medical Focus)	Medical Services Responsible Entity Management, Contractor Medical Services Coordinator	Monthly
Short Service Employee Program Assessment	Company HES Advisor, Contractor HSE Supervisor, and Responsible Entity HSE	Monthly
Emergency Response and Preparedness Assessment	IMT Members	Quarterly



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Assessment / Audit Type	Participants	Frequency
Quarterly, Six-Monthly, or Annual Plan and Procedure Audits as defined in "Audit Participation and Elements" and "Audit Schedule"	As defined in Audit Participation and Elements (see Attachment 4 - Audit Participation and Elements)	As defined (see Attachment 4 - Audit Participation and Elements)
Corporate HSE Assessment	As determined by HSE Corporate Assessment Manager	Annually

Table 1: Formal Compliance Monitoring

Where no in-house Asset & Facility Manager or O&M team exists and the Entity has commissioned O&M service delivery through an external contractor, this will be deemed the 'Responsible Contractor' and whose responsibilities as regards H&S would normally include:

- Maintains up to date H&S Program relevant to the site/premises being managed
- Meets the commitment to H&S E issues.
- Conducts regular H&S self-assessment
- Complies with all H&S related clauses in the contract and the HSE Plan.
- Uses internal H&S control system(s).
- Monitors the quality, condition and integrity of his equipment and tools.
- Holds regular Toolbox (Pre-job start meetings) and H&S meetings.
- Participating in inspections, assessments and audits.
- Reporting status of deficiencies and findings to Responsible Entities.
- Compiling and analyzing H&S compliance data as assigned by HSE Representative.
- to comply with applicable statutes, codes, regulations, standards and contract requirements
- Implements and participates in emergency exercises and drills where applicable.
- Manages risks, which arise from changes to the H&S Program.
- Complies with incident and near miss reporting, investigation and follow-up.
- Resolves interface problems.
- Coordinate with other contractors on site to ensure work performed safely.
- Assessing employee competence and assigning individuals to tasks commensurate with their skill and qualification levels.

The Responsible Contractor's representative should monitor the continued competence of the Subcontractor and their employees. This includes any associated training. Where necessary, the Responsible Contractor should also determine if additional competence assurance is needed because of local circumstances. Monitoring should include verification that the Subcontractor complies with its management system, policies, and procedures that may include:

- Competence and close monitoring of the replacement of personnel.
- Provision of the necessary induction courses.
- Training of Subcontractor personnel in job related activities and procedures.
- Completion of all agreed-upon training, including any specified regulatory training requirements.
- Adherence to the Responsible Contractor's initiatives such as Zero Accident Philosophy and applicable processes.

Regular inspections by the Responsible Contractor provide a means of checking compliance with contract requirements including meeting the requirements of the specified contractual HSE Key Performance Indicators. The frequency of such inspections/verifications depends on the value of the work and the risks involved. Auditing provides a more formal and comprehensive assessment of adherence to an HSE Plan.

Responsible Contractor and the Subcontractor are jointly responsible for adhering to the Zero Accident Philosophy as well as monitoring, evaluating performance of work and managing changes within the work plan. A successful monitoring and evaluation program may include the following:

- H&S performance reporting.
- Inspections by Responsible Contractor and Subcontractors.
- Incident reporting and investigation.
- Conducting emergency drills and subsequent assessment.



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Inspections and audits should be performed by both Subcontractor and the Responsible Contractor. Joint inspections have the advantage of aligning divergent goals, enhancing understanding and promoting improvements. Inspection results should be shared between the Responsible Contractor and Subcontractor to aid in improving H&S performance. **Attachment 2 - Contractor HSE Program Evaluation Criteria** can be used as an example of evaluation criteria that can be used to assess a potential subcontractor's status.

5.2 HSE Representative

- Managing H&S resources to support implementation.
- Developing and maintaining a schedule of activities related to the implementation of this Procedure.
- Managing the data collected and retaining records.
- Reporting of H&S compliance.
- Conducting the risk assessment to the scope of work to ensure that the risks are adequately assessed and understood.
- Reviewing and approving a Subcontractor's environmental, safety, and health programs.
- Providing information to Contracts for consideration in the development of bidder's lists and subsequent Subcontractor selection and award.
- Recommending the contracting method to be used based on the H&S evaluation.
- Assuring adequacy of Subcontractor submittals to meet Responsible Contractor requirement if the subcontractor must use the Responsible Contractor Program.

The Responsible Contractor will utilize monthly self-assessments to assess and continually improve the requirements of the H&S Program and these will be made available for the HSE Representative for review. Monthly assessments should involve a cross section of the work group and include the monitoring of subcontractor activities. This type of assessment can be documented on a form (see **Attachment 1 – EOM-KS0-TP-000017 - Work Risk Assessment Checklist Template**).

6.0 PROCESS

An integral aspect of the work planning process is the performance of a proper risk assessment. Risk Assessments must be conducted at the Planning Stage to identify the hazard risks and determine control measures. The frequency and level of H&S Assessment Process/Compliance and Monitoring will be determined by an assessment of the nature and scope of the work being undertaken.

As part of the Project H&S Assessment Process, the identified personnel identified in Section 5 above, must ensure that the above are completed, and can be called upon when required to conduct audits and inspections and reporting on a regular scheduled basis.

6.1 Performance of Work

The objective of the Performance of Work phase is to verify that the agreed upon H&S policies, systems and procedures are in place, being implemented and improved.

Responsible Contractor and the Subcontractor are jointly responsible for adhering to the Zero Accident Philosophy as well as monitoring, evaluating performance of work and managing changes within the work plan. A successful monitoring and evaluation program may include the following:

- HSE performance reporting.
- Inspections by Responsible Contractor and Subcontractors.
- Incident reporting and investigation.
- Conducting emergency drills and subsequent assessment.

6.2 Daily Monitoring



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The Responsible Contractor (where appointed) shall provide adequate resources to manage and monitor H&S compliance and performance against the specified H&S KPIs, take immediate corrective actions, document findings, and report compliance as required in this Procedure.

The Responsible Contractor shall perform informal, daily, field oversight of work activities including those undertaken by subcontractor(s) or specialist contractor(s), to monitor H&S compliance. When 'at risk' behavior, non-compliant HSE work practices or conditions are identified, immediate intervention will be required and corrective action pursued. This may include changes to working methods or training / re-training of contractor staff to ensure full awareness and correction of behavioral deficiencies and risks.

6.3 Audits and Inspections

To verify compliance with the H&S Program including all plans, policies and procedures, the Responsible Contractor (where appointed) and HSE representative will perform field inspections and audits of the contractor's O&M activities including those undertaken by subcontractor(s) or specialist contractor(s). Participants in these field inspections and audits shall include Contractor Manager, Contractor Supervisor(s), and Contractor HSE Professionals. Results of inspections and audits will be available for review by the Asset & Facility Manager and /or HSE representative for the Entity.

Several H&S Plans and Procedures require an audit to be performed by the HSE representative, on a time-frequency basis. Plans and Procedures to be included in the audits, required participants, and the audit processes to be used are listed in Audit Participation and Elements and Audit (see **Attachment 4 - Audit Participation and Elements**).

These audits will include:

- Review of records and paperwork.
- Review of training materials, tests, and rosters.
- Field observations.
- Interviews with Project personnel.
- Review of Plan/Procedure effectiveness.

The results/findings of Audits will be formally transmitted to the relevant Contractor(s), with instructions to close all findings. In addition, findings and non-compliances, will be entered into a HSE Action Database to track to a satisfactory closeout. The audit process will be led by the HSE representative and shall include:

- Assess the Contractor's H&S Program to determine effectiveness.
- Review the Contractor's accident history, as well as all pertinent records, such as but not limited to:
 - Training Records.
 - Injury/Illness Records including near misses and Lost Time Injuries to personnel.
 - HSE Inspection Records.
 - Examples of HSE Enforcement Actions.
 - Positive Incentive and Award Records.
 - Documented references of similar work with other companies.
- Conduct on-site observations of work in progress to assess the actual implementation and observance of HSE requirements.
- Assess performance against the HSE KPI's within the O&M contract
- HSE representative will document the audit findings.
- The HSE representative will meet, with the Contractor after the audit, to discuss the findings. The findings of the audit will be included within the Contractor's subsequent monthly report and reference any failures in meeting the HSE KPI's that may have been found.

6.3.1 Asset & Facility Manager / Responsible Contractor's Weekly Site Walk-Down

The Site Manager will lead a site-wide inspection on a weekly basis. The assessment format will be in accordance with the following guidelines:

- Involve Company, Contractor, and Responsible Entity Managers, Supervisors, and HSE professionals in groups to effectively assess pre-selected areas of the site.



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- Compile recommendations and effect improvement.
- Identify and provide positive and negative feedback on performance.
- Develop corrective action items based upon the information obtained, or provide feedback when further analysis or long term solutions are needed.

6.3.2 Life Critical Inspections

Several O&M activities are considered “life-critical,” including the impacts of Simultaneous Operations, in that failure to address the risk, or follow established protocol and work procedures, has a high likelihood to result in loss of life. This is particularly true within a healthcare environment. For life-critical activities, the following strategy will be applied.

- Conduct a risk assessment of the activity using the Risk Assessment procedure, involving the personnel who will be directly associated with the activity.
- Avoid the high-risk activity.
- If the activity cannot be avoided, then assess and mitigate identified risks specifically associated with the activity.
- Conduct the required planning for the activity, including obtaining resources.
- Conduct training for the individuals who are associated with the activity.

The HSE representative is responsible for monitoring compliance with the life-critical safety requirements. The life-critical categories include the following:

- Fall Prevention and Protection, which includes work on/in.
 - Scaffolds.
 - Ladders.
 - Suspended Personnel Platforms.
 - Aerial Lift Devices.
- Electrical Safety, Overhead Power Lines and Lockout/Tagout.
- Confined Space Entry.
- Excavation and Trenching.
- Lifting and Rigging Operations.
- Barricades.
- Work Over or Near Water.
- Testing that Involves Release of Stored Energy.
- Permit-to-work Systems/Bypassing Safety Devices.
- Traffic and Vehicle Management.
- Radiological
- Chemical

Contractor and Subcontractor Management and Supervision must assess the risks associated with associated life-critical activities and establish procedures, plans, resources, and supervision to execute the activity safely. Additionally, Project-defined activities associated with high-level risk may be added at the discretion of the HSE Manager.

6.3.3 Focused Inspections

Focused Inspections are completed by Responsible Contractor (where appointed) and supervision with assistance and participation from the HSE representative.

The HSE representative will select focused subject matter and Project-site areas to inspect, based on the topics indicated in this section, current Project experience, current and past compliance, and construction activities currently in progress. Focused Inspections may include more than one focus.

An 8-week schedule of Focused Inspection dates will be developed and kept current. Participants (by position) will be scheduled and selected based on the focused subject matter and the area to be inspected (e.g., the Medical Services Coordinator will participate in the Medical Focus Inspections).



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Findings will be documented and non-compliances will be entered into the HSE Action Database to track satisfactory closeout. Files and documentation pertaining to Focused Inspections will be maintained and made available for auditing purposes.

6.3.4 Safety Focus (Weekly)

Safety Focused Inspections include:

- Barricades
- Confined space entry
- Elevating work platforms
- Excavation and trenching
- Fall prevention and protection
- Lifting activities using Plant or Craneage
- Lockout/Tagout
- Portable ladders
- Roofing work
- Scaffolding

6.3.5 Health and Hygiene Focus (Weekly)

Health and Hygiene Focused Inspections include inspections of camp facilities and construction areas for compliance with industrial hygiene and occupational health requirements. Health and Hygiene Focused Inspections will include:

- Air contaminants (Dusts, Fumes, Mists)
- Drinking water sanitation including coolers/chests
- Fatigue management
- Hazardous chemicals/Dangerous Goods and labeling
- Heat Stress prevention
- Manual handling
- Noise

6.3.6 Medical Focus (Monthly)

Medical Focused Inspections are conducted at the camp and medical facilities for compliance with the Occupational Health Plan, Industrial Hygiene Plan, established Medical Service protocols and standards, and the Medical Service Subcontract requirements. Medical Focused Inspections will include:

- Outfitting of facilities in accordance with level-of-service requirements.
- Cleanliness of facilities.
- Level of staffing in accordance with requirements.
- Maintenance of records in keeping with contract.
- Handling of potential blood-borne pathogens.
- Handling of medical wastes.

The Medical Services Management will participate in the inspections.

6.3.7 Various Equipment and Tool Inspections

Several Project Specific, as well as Responsible Contractor specific procedures detail equipment and tool inspections by type of inspection, frequency, personnel involved, and register/log/tagging requirements. These inspections include:

- Electrical Tools and Cords.
- Eye Wash/Safety Showers including sanitation.
- Fall Protection Equipment.



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- Fire Extinguishers.
- Ladders.
- Residual Current Devices.
- Rigging and Rigging Hardware.

Personnel who perform and document these types of inspections shall have the proper qualification and/or training per Responsible Entity-specific procedures. Contractor will verify compliance during daily monitoring, focused inspections and audits.

6.3.8 Night Work Audits and Inspections

A night shift work area inspection will be conducted each night shift, to verify that the minimum requirements are met. The Night Work Area Inspection form located in EOM-KSS-PR-000010 Night Work Procedure, used by Subcontractors and Contractor HSE Advisors to document lighting conditions. Details on participation, elements and frequency of Audits are found in Audit Participation, Elements, and Audit Schedule (see **Attachment 5 - Audit Schedule**).

6.4 HSE Execution Plan Assessments

HSE Assessments are conducted on a periodic basis to assess the application of HSE Execution Plan and to make recommendations for improvement. Assessments may encompass all HSE processes and procedures, or be limited to a critical few. Assessments will be performed utilizing the Self-Assessment Process. Key areas of assessment:

- Training and Education.
- Responsibilities.
- Hazard Communications Program.
- Record keeping.
- Accident Investigations.
- Safety Task Analysis.
- Injury and Illness Trends.
- Poor project HSE performance.
- Exceptional project HSE performance.
- Increasing level of risk associated with project work.

The HSE representative is responsible for conducting at least one comprehensive assessment of the Responsible Contractor's HSE Execution Plan and applicable processes and procedures with a follow-up review each year.

6.5 Corrective Actions

Findings results of inspections, audits and assessments, or deficiencies will be entered into the HSE Action Database to track satisfactory closeout. HSE representative will notify Contractor of these findings or deficiencies in either formal documentation or via weekly notifications approved by the Contractor Site Manager. The process for closing these items is as follows:

- Upon receipt of findings or deficiencies, the HSE representative will review the person(s) designated as responsible for closing the action and acknowledge as correct with 48 hours of receipt.
- If the finding exposed immediate danger to employee, it will be corrected within 48 hours.
- Written notification is required from the HSE representative to Contractor's site manager if items are not closed within 14 calendar days. Notification shall include status, interim measures, and target completion.
- Items will not be considered closed until applicable evidence is provided. Examples include:



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- Sign-in sheets or registers.
- Revisions to existing formal documents.
- Photographs of completions.
- Formal, dated verification/signature by Contractor HSE Supervisor or Professional.
- Applicable documents (material receipts, training outlines, etc.).

7.0 RECORDS

Responsible Contractor and subcontractors will maintain their own HSE records. Contractor will have access to these records for audit purposes. The following records will be required:

- Number of weekly planned audits and inspections – actual versus planned with follow-up on substandard items identified.
- Incident Investigation – completed investigation including follow-up on identified remedial actions.
- Number of Weekly Toolbox Meetings – completed with actions on concerns raised.
- Number of persons trained and type of training performed.
- Weekly HSE statistical summary report.
- Copies of any reports issued as a result of visits or inspections conducted by regulatory agencies.
- Certification documentation (e.g., cranes)
- Copies of Safety Data Sheets.

In accordance with recordkeeping requirements, the following records will be maintained on file by the Responsible Sub-contractors and available for review by Contractor and a copy be provided to Contractor prior to the Sub-contractor demobilizing from the Project:

- Pre-use equipment checklists.
- Training records/induction records/environmental awareness training.
- Competency and Verification of Competence records.
- Course outlines.
- Copies of attendance lists for training provided to employees.
- Signed copy of the company specific orientation checklists.
- STARRT cards.
- Copies of WMS
- JHAs.
- Risk Assessments.
- Copies of task specific work procedures.
- Work permits/lifting plans.
- Industrial Hygiene monitoring records.
- Health Safety and Environmental Inspection, assessment, and audit records.
- Equipment inspection logs. (i.e. cranes and other heavy equipment)
- Radiation licenses, registration and certificates.
- Emergency drill records & reports.

All HSE documentation will be made available for audit by Contractor.

8.0 ATTACHMENTS

1. EOM-KS0-TP-000017 Work Risk Assessment Checklist Template
2. Contractor HSE Program Evaluation Criteria
3. EOM-KS0-TP-000006 Contractor Self-Assessment Form Template
4. Audit Participation and Elements
5. Audit Schedule



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Attachment 1 – EOM-KS0-TP-000017- Work Risk Assessment Checklist Template

This checklist is meant to be a prompt in identifying risks associated with the work/services to be performed. Although, it is structured to be comprehensive in nature and is not limited to hazards to employees/contractors, it may not contain all conceivable risk permutations. This is designed to look at the hazards and the probability of the occurrence. The objective here is to identify the risks and not the preventative and/or mitigation measures for the risks identified.

The following checklist is not designed to be exhaustive and the user is expected to exercise professional judgment as to the completeness and/or applicability of the listing.

Hazards	Comments
People Hazards	
Blasting-working with/around explosives.	
Pile Driving.	
Excavations – to include tunneling.	
Demolition of existing structures.	
Working at heights – towers, scaffolds, etc.	
Working over water.	
Handling/Use of hazardous materials – e.g., Asbestos, cleaning solvents, fuels, lead, benzene, chromium, etc.	
Working near/adjacent to equipment/piping/vessels handling flammable, toxic or other hazardous chemicals.	
Working in cold/hot environments.	
Work with/around high pressures.	
Working with/around energized equipment/lines	
Performing critical lifts – use of cranes, forklifts, etc.	
Vessel (confined space) entry	
Diving operations – scuba/saturation	
Use of motorized vehicles – forklifts, automobiles, trucks, etc.	
Working with ionizing/non-ionizing materials/equipment	
Working at high altitudes	
Working in areas with high incidents of disease – malaria, dengue fever, AIDS, etc.	
Adequacy and availability of medical care	
High rate of kidnappings, crime, terrorism (general security concerns)	
Ergonomic concerns	
Certifications required	
Hazards	Comments
Environmental Hazards	
Working in or in proximity to sensitive environments – wetlands, protected species	
Likelihood of spills to waterways, or other sensitive environments	
Stringency of environmental laws/regulations	



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	Active environment community – locally and/or internationally	
	Air emissions	
	Water emissions	
	Waste generation – hazardous and non-hazardous	
	Archeologically sensitive areas	
	Historically sensitive areas	
	Culturally sensitive areas	
	Certifications required	
	Permits required	

Exposure and Liability Potential		
	Potential for major equipment/property loss	
	Impact on schedule and/or contractual requirements	
	Legal environment – litigation potential	
	Regulatory environment – stringency and imposition of criminal/civil penalties	

Reputation/Image		
	Quality of work – level of complexity	
	Working in remote sensitive environments	
	Numbers of non-governmental organizations (NGO's) interested in the area.	
	Local content requirement – people/companies/goods	
	Access to location by media	
	Potential contractor image locally/nationally/internationally	



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Attachment 2 - Contractor HSE Program Evaluation Criteria

CATEGORY	SCORE			
	0	3	7	10
Safety Program	An informal safety program exists and is conveyed informally.	A program exists but not in a widely-distributed document.	Safety program exists, which establishes responsibility for safety, but not widely distributed.	Program clearly establishes responsibility and accountability and is distributed to all employees with periodic updates.
Emergency Response	Emergency response procedures, if they exist, are informal and not always communicated.	Basic procedures only.	Emergency procedures are written for major scenarios. No requirements established for drill frequencies.	Written emergency procedures for all major scenarios exist. Procedures are documented in an Emergency Procedures Manual, which is widely distributed. Frequency of conducting drills established.
Safety Rules	If safety rules exist, they are informal.	Safety rules have been developed in written form.	Safety rules are incorporated in a Safety Manual, but not in a format that is distributed to employees.	Safety rules exist in handbook form, and distributed to employees. Disciplinary action procedures established for infraction of rules.
Accident/ Incident Reporting	No Procedures exist, or are verbally communicated procedures exist – (no written program)	Written procedures requiring basic reporting of personal injuries only.	Written procedures requiring reports on all accidents and incidents.	Procedures require accident reports to be provided to contracting firm representative. Supervisor investigation required to determine and correct root causes.
Employee Orientation	Employee orientation program does not exist.	Verbal instructions on Company procedures only.	Orientation booklet provided for new employee, but no on-the-job orientation by the supervisor. Language barriers are recognized.	Employee handbook provided and supervisor outlines, explains and demonstrates new employee's job. Follow-up observation of the new employee at work is included. Safe practices and emergency duties are explained to employees. Multi-lingual program.
Safety Meetings	Safety meetings do not occur.	Periodic safety meetings for special operations only.	Safety Meetings are performed on a regularly scheduled basis by the supervisor or safety representative.	In addition to "7" employees are assigned topics to discuss on a rotational basis.
Safety Training	Limited or no safety training provided.	Occasionally conducts on site basic safety training.	Safety training is given for specialized operations, but no routine training conducted.	Formal safety training programs have been developed and are conducted on a regular basis. Retraining periods are established.
Inspections	No inspection program.	Informal inspection program exists but has inconsistent follow-up at best.	A written program outlining inspection guidelines, responsibilities, frequency and follow-up is in effect	In addition to "7", periodic inspections are conducted by top management or by teams of specialists. Reports are shared across the organization.
Professional HSE Support	None on staff. Not assigned to any specific person.	Safety professional on staff. Not routinely involved in operations.	Safety professional on staff who routinely inspects operations, monitors compliance and communicates findings.	"7" plus the safety representative has sufficient authority to implement change(s).



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CATEGORY	SCORE			
	0	3	7	10
Substance Abuse	There is no policy or if it exists, it is not communicated.	A policy exists, but no screening is administered.	A policy exists and "for cause" screening is administered.	A policy exists with searching/screening procedures acceptable to Responsible Contractor.
Industrial Hygiene (IH)	No IH program exists.	Basic program exists but is not enforced.	A program exists that recognizes hazards but has no follow-up.	A program with an objective to minimize human health impacts and provide a workplace, which minimizes recognized health hazards.
Personal Protective Equipment	Contractor does not supply PPE.	Provides minimum personal protective equipment.	Provides appropriate equipment but lacks training and follow-up.	Contractor furnishes all safety equipment, training and clothing necessary for the protection of its personnel.
Environmental Program	No program exists to identify environmental requirements.	A program exists to identify regulatory requirements and is focused on minimal compliance.	A program exists which complies with local regulations and some industry practices.	A program which exceeds local regulations and complies with Responsible Contractor's expectations exists and functioning.
Equipment Management	No program exists for regular inspection and preventative maintenance.	While a program exists, it is sporadic and no recordkeeping occurs.	Program exists which is regularly applied but with limited recordkeeping.	A regular program exists for inspection, preventative maintenance, operation, acquisition and certifications. Good recordkeeping.
Record Keeping	Lacks statistical data.	Has statistical data. Trends are increasing or rate is significantly above the industry norm.	Has current statistical data. Average performance compared to industry.	Has historical data for past three years. Trends are decreasing and relative position in industry is high.
Incident Investigation	Lacks procedures or process to investigate incidents	Has a procedure or process established to investigate incidents? Near misses not recognized.	Has procedures but is deficient in several areas that can be corrected through changes in existing programs.	Recognizes and records actual near miss incidents. Investigates incidents to root causes through established procedures. System exists to track and closeout findings.
Lower-tier Sub-Contractors	No evidence that sub-contractor EHS performance is considered.	Some evidence that the sub-contractor's safety performance is considered in the selection process.	Some statistical tracking of sub-contractor's safety performance.	Evidence that sub-contractors are evaluated on safety performance as part of the selection process. Joint participation with sub-contractor in safety management throughout the organization.
Other	No E, S, or H policy.	Has E, S or H policy but not all	Communicates the policy and the roles and responsibilities for all employees	"7" plus includes HSE criteria in Annual Review and compensation decisions.

Health & Safety Compliance Assessment Procedure

Attachment 3 – EOM-KS0-TP-000006 Contractor Self-Assessment Form Template

[illegible]



Health & Safety Compliance Assessment Procedure

Attachment 4 - Audit Participation and Elements

Plan / Procedure	Participants	Audit Processes
Lockout and Tagout Plan	Contractor Project HSE Manager Contractor Tagging Authority Site Manager Subcontractor HSE Manager	Evaluate compliance with Procedure Review current and closed System/Equipment Energy Isolation and Safety Tagging Permits Inspect work areas and work activities using the System/ Equipment Isolation and Safety Tagging Assessment Checklist (Lockout and Tagout Plan, Review training and other related documentation
HSE Training Management Plan	Contractor HSE Manager Contractor HSE Training Supervisor Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Review training records, metrics, data base, and other related documentation
Industrial Hygiene Plan	Contractor Project HSE Manager Responsible Superintendent Contractor Industrial Hygiene Supervisor Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect project facilities, work areas and work activities using the Industrial Hygiene Assessment Checklist (Industrial Hygiene Plan) Review monitoring and sampling data Review training and other related documentation
Medical Services (Occupational Health Plan	Contractor Medical Services Coordinator Contractor Project HSE Manager Site Manager Subcontractor Medical Services Manager	Evaluate compliance with Procedure Inspect Medical and First Aid Facilities Complete Medical Services Assessment Checklist (Occupational Health Plan) Review related documentation
Fire Prevention and Protection Procedure	Contractor Project HSE Manager Contractor Emergency Response Coordinator Project Permit Coordinator Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Review current and closed Hot Work Permits Inspect work areas and work activities using the Fire Prevention and Protection Assessment Checklist (Fire Prevention and Protection Procedure Review training records, equipment inspection records, and other related documentation
Personal Protective Equipment (PPE) Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the PPE Assessment Checklist (Personal Protective Equipment (PPE) Procedure. Review related documentation
Confined Space Operations Procedure	Contractor Project HSE Manager Responsible Superintendent Contractor Permit Coordinator Site Manager Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Confined Space Operations Assessment Checklist (Confined Space Operations Procedure Review training and other related documentation



Health & Safety Compliance Assessment Procedure

Plan / Procedure	Participants	Audit Processes
Crane and Rigging Operations Procedure	Contractor Project HSE Manager Contractor Equipment Manager Contractor Supervisor Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Crane and Rigging Assessment Checklist (Crane and Rigging Operations Procedure, Review training records, equipment inspection records, and other related documentation
Electrical Safety Procedure	Contractor Project HSE Manager Contractor Permit Coordinator Electrical Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Electrical Safety Assessment Checklist (Electrical Safety Procedure Review training and other related documentation
Elevating Work Platforms Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager Contractor Supervisor	Evaluate compliance with Procedure Inspect work areas and work activities using the Elevating Work Platforms Assessment Checklist Elevating (Elevating Work Platforms Procedure Review training and other related documentation
Excavation - Trenching and Ground-Floor Penetration Operations Procedure Utility Avoidance Procedure	Contractor Project HSE Manager Contractor Site Superintendent Permit Coordinator Representative Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Excavation and Trenching Operations Assessment Checklist (Excavation and Trenching Operations Procedure) and Utility Avoidance Assessment Checklist (Utility Avoidance Procedure Review training, permits, and other related documentation
Fall Protection and Prevention - Work at Height Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Work at Height Assessment Checklist (Fall Protection and Prevention - Work at Height Procedure Review training and other related documentation
General Safe Work Practices Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the General Safe Work Assessment Checklist (General Safe Work Practices Procedure Review training records, equipment inspection records, and other related documentation
Chemical Management Procedure	Contractor Project HSE Manager Project Environmental Manager Contractor Industrial Hygiene Supervisor Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect storage areas, work areas and work activities using the Chemical Management HSE Assessment Checklist (Chemical Management Procedure Review Hazardous Substances Log, MSDSs, Hazardous Substance Use Request Forms Review training and other related documentation



Health & Safety Compliance Assessment Procedure

Plan / Procedure	Participants	Audit Processes
Hazard Identification and Control Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Attend and evaluate quality and effectiveness of STARRT meetings Review JHAs for content and implementation Complete the Hazard Identification and Control Assessment Checklist (Hazard Identification and Control Procedure) Review related documentation
Hazardous Substances Exposure Protection Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Hazardous Substance Exposure Prevention HSE Assessment Checklist (Hazardous Substances Exposure Protection Procedure) Review training records, equipment inspection records, and other related documentation
Incident Reporting - Investigation and Management Procedure	Contractor Incident Investigator Contractor Project HSE Manager Site Manager	Evaluate compliance with Procedure Evaluate quality of investigations Evaluate status of corrective actions
Night Work Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Night Work HSE Assessment Checklist (Night Work Procedure) Review training records, equipment inspection records, and other related documentation
Permit-to-Work Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager Contractor Permit Coordinator	Evaluate compliance with Procedure Review current and closed Permits Inspect work areas and work activities using the Permit to Work Assessment Checklist (Permit-to-Work Procedure) Review training and other related documentation
Pile Driving Operations Safety Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Pile Driving Operations Assessment Checklist (Pile Driving Operations Safety Procedure) Review training records, equipment inspection records, and other related documentation
Safe Heavy Equipment Operations Procedure	Contractor Project HSE Manager Contractor Equipment Manager Contractor VOC Supervisor Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Safe Heavy Equipment HSE Assessment Checklist (Safe Heavy Equipment Operations Procedure) Review training records, equipment inspection records, and other related documentation
Safe Use of Hand and Power Tool Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Hand and Power Tool HSE Assessment Checklist. Safe Use of Hand and Power Tool Procedure Review training records, equipment inspection records, and other related documentation



Health & Safety Compliance Assessment Procedure

Plan / Procedure	Participants	Audit Processes
Scaffold Operations Procedure	Contractor Project HSE Manager Responsible Superintendent Subcontractor HSE Manager	Evaluate compliance with Procedure Inspect work areas and work activities using the Scaffold Assessment Checklist. Scaffold Operations Procedure Review related documentation



Health & Safety Compliance Assessment Procedure

Attachment 5 - Audit Schedule

	January	February	March	April	May	June	July	August	September	October	November	December
Audits-Quarterly												
Permit to Work	✓			✓			✓			✓		
Lockout / Tagout	✓			✓			✓			✓		
Personal Protective Equipment – see Note 1		✓		✓			✓			✓		
General Safe Work Practices – see Note 1		✓		✓			✓			✓		
Hazard Identification and Control		✓		✓			✓			✓		
Night Work		✓		✓			✓			✓		
Hazardous Substances Exposure Protection		✓		✓			✓			✓		
Safe Heavy Equipment		✓		✓			✓			✓		
Cranes and Rigging		✓		✓			✓			✓		
Scaffold Operations		✓		✓			✓			✓		
Fall Prevention and Protection – Work at Height		✓		✓			✓			✓		
Elevating Work Platforms		✓		✓			✓			✓		
Electrical Safety		✓		✓			✓			✓		
Excavation and Trenching/Utility Avoidance	✓			✓			✓			✓		
Safe Use of Hand and Power Tools		✓		✓			✓			✓		
Confined Space Operations		✓		✓			✓			✓		
Pile Driving Operations		✓		✓			✓			✓		
Audits- Six Monthly												
Hazard Communication						✓						✓
Industrial Hygiene – see Note 1					✓						✓	
Fire Prevention and Protection				✓						✓		
HSE Training Management	✓						✓					
Cyclone Preparedness		✓						✓				
Incident Reporting, Investigation and Management			✓									
Medical Services	✓											
Vehicle Safety Management		✓						✓				
Audits- Annual												
Emergency Response and Preparedness					✓							
	January	February	March	April	May	June	July	August	September	October	November	December
Focused Inspections (Safety) –Weekly Note: Sample only, not all-inclusive												
Fall Prevention and Protection	✓		✓				✓			✓		✓
Scaffolding	✓		✓			✓		✓		✓		✓
Barricades		✓				✓		✓		✓		✓
Roofing Work		✓				✓		✓		✓		✓
Portable Ladders		✓				✓		✓		✓		✓
Elevating Work Platforms		✓				✓		✓		✓		✓
Excavation and Trenching		✓				✓		✓		✓		✓
Confined Space Entry		✓				✓		✓		✓		✓
Lockout/Tagout		✓				✓		✓		✓		✓
Lifting Activities		✓				✓		✓		✓		✓
Focused Inspections (Health & Hygiene)-Weekly												
Air Contaminants (Dusts, Fumes, Mists)	✓		✓		✓		✓		✓		✓	✓
Hazardous Chemicals/Dangerous Goods	✓		✓		✓		✓		✓		✓	✓
Heat Stress Prevention		✓		✓		✓		✓		✓		✓
Drinking Water & Distribution		✓		✓		✓		✓		✓		✓
Manual Handling		✓		✓		✓		✓		✓		✓
Noise		✓		✓		✓		✓		✓		✓
Fatigue Management		✓		✓		✓		✓		✓		✓
Focused Inspections (Medical)-Monthly												
Staffing, Medical Waste, Equipment, Records, Cleanliness, and Blood Borne Pathogen prevention	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Weekly Site Manager's Walk-down-Weekly												
Site Manager select/assess a "Focus" each week	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Camp Facility Walk-down-Weekly												
Inspect Camp, Kitchen (Food Safety) and Accommodations	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Emergency Response Preparedness Assessment												
ER Plan implementation review			✓			✓			✓			✓