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SHE Training for Managers of Contractors

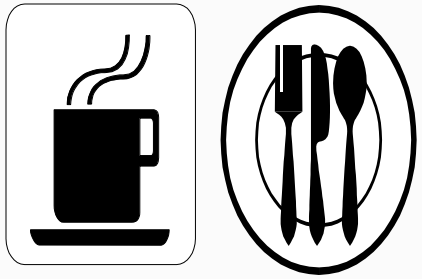
Low Complexity Work

Domestic arrangements















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Course introductions

- Name
- Job description
- Examples of contractors and/or contracts managed
- Any specific safety issues

Overall aims and objectives of the course

- This course is to understand the basic requirements for SHE management of contractors in STFC as set out in SHE Code SC15 and how they relate to tasks that you will oversee :
  - Understand the basic requirement in STFC SHE Code 15
  - Understand the basics of good contractor management
  - Understand where to find help and guidance relating to contractor management
  - Understand the activities for contract supervising officers (CSOs) and contractors
- The course does not cover the detailed requirements for works deemed as “construction” that come under the CDM2015 regulations (see SHE Code SC13)

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Course assessment

- The course will be assessed :
  - By completing a multiple choice test on the main elements of the course at the end of the course
  - The course pass mark is 70%



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Contractor safety background

- Contractor incident rate is historically significant – 30% of incidents on Evotix are contractor related
- High percentage of contractor incidents tend to be reported by staff
- Under-reporting is still an issue
- Contractor incident types and causes are very broad
- Pleasingly, false fire alarms from building works are now minimal (due to fumes, dusts, etc.)

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Legal Basics in the Management of Contractors

Health and Safety at Work Act legal basics

- Section 2
  - "It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all his employees"
  - You cannot look after your own staff if non-staff/others working within STFC are not properly under control
- Section 3
  - "It shall be the duty of every employer to conduct his undertaking in such a way as to ensure, so far as is reasonably practicable, that persons not in his employment who may be affected thereby are not thereby exposed to risks to their health or safety"
  - Fundamental duty to look after non-staff/others working in your department and STFC!

Legal basics

- Management of Health and Safety at Work Regulations 1999
  - Reg. 3 Absolute duty on the employer to carry out a risk assessment, including when things change, and specifically to persons involved in work but not in direct employment (e.g. contractors), both from STFC to the Contractor, and from the Contractor to STFC.
  - Reg. 8 Everyone – staff/non-staff – to be made aware of procedures for serious and imminent danger
  - Reg. 11 Co-operation and co-ordination on safety where there are two or more employers in a shared workplace – this is also a key parts of other legislation!
  - Reg. 12 Provision of comprehensible information to other persons working in the host organisation and their employer
  - Reg. 15 Duties for temporary workers – fixed term contracts, agencies and agency workers

What does this mean?

- The law sets out a very broad duty to systematically look after the health and safety of contractors

- Some common myths:
  - It's not our responsibility - we have appointed contractors – it's their problem
  - It's alright – we're insured and they are insured
  - Under the contract they have agreed to take responsibility for health and safety

- The reality is it's a shared duty - Health and Safety duties imposed by statute and regulations cannot be delegated – its all about who's undertaking it is!

The reality

- R v Associated Octel Co Limited (1994)
  - Octel operated a large chemical plant at Ellesmere Port
  - In June 1990, while the plant was shut down for annual maintenance, contractors were engaged in repairing the lining of a tank
  - The way in which the work was carried out caused a flash fire in which one of the contractor's employees was badly burned
- See detail in supplementary materials

Firms fined for electrician's 35ft fall at Coventry manufacturers - BBC News

Both contractor and company where this took place were prosecuted and fined



£100 padlock would have prevented this contractor from being harmed



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STFC Example

Recent incident in ISIS, the servicing of boiler units at height:

- Contractors were observed not to be wearing harnesses while working at height in a MEWP

- They were called down and the work was stopped in a safe manner:
  - They should have been attached to the MEWP they were using for access
  - Their excuse was that the regulations had only changed recently (in fact, it was 2002)
  - RAMs were poor and generic

- Background: Falls from height killed 31 people last year, which is >25% of all work-related fatalities

(source: HSE Work-related fatal injuries in Great Britain 2025/26)

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SHE Code 15 – Management of Contractors

STFC's strategy

- To be world class in what we do and comply with all aspects of legislation through the provisions of STFC Code 15: Management of Contractors including provision of training to those involved

- This is achieved by setting out clear responsibilities for:
  - The Contract Supervising Officer (CSO)
  - The Contractor



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Contract Supervising Officers (CSO)

- An STFC employee, or their representative, who is responsible and competent to define the contracted works and appoint the contractor, or raise a PO

- Should define the SHE requirements of any contract explicitly as these will not be included automatically by STFCs centralised procurement service

- Must ensure only competent contractors are used

- An STFC employee that has a responsibility for ensuring that the contractor undertakes their work in accordance with the conditions of the contract or other agreed instructions (RAMS, PO etc)

- The CSO may be any competent person employed by, or acting on behalf of STFC

Contractor

- Any organisation/person(s) that the STFC engages to undertake work who is not employed by the STFC, irrespective of whether they are paid or not by the STFC.

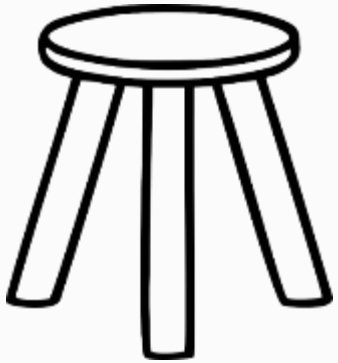
- Work undertaken by a contractor may include projects and activities such as:

  - commissioning or de-commissioning equipment or plant
  - installing, inspecting, testing, repairing, cleaning or servicing equipment or plant
  - providing software development, IT support etc.
  - providing gardening, grounds maintenance etc.
  - providing catering, cleaning etc.
  - providing design consultancy, surveying, site investigations etc.

Competence

- The SHE Group follow a simple competence model
  - Knowledge/training
  - Skills/Experience
  - Attitude/Behaviours

COMPETENCE



- Note, further training/coaching may be prudent for SLCs and CSOs e.g. based on SC10, SC06, SC13.

- A key part of competence is gaining on the job experience to develop as a SLC/CSO.

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Summary of SHE Code 15 requirements

- When employing a contractor, STFC (so you) is obliged to (so must):
  - Consider all aspects of safety at the planning stage
  - Ensure competency at the selection stage, e.g. use Appendix 2
  - Undertake full assessment of risks and controls in both directions prior to work starting (RAMS)
  - Agree on supervision arrangements prior to work starting
  - Confirm competency and all arrangements at the outset (certificates, etc).
  - Deliver induction(s) as necessary, perhaps local training or SHE mandatory courses
  - Adequately monitor the contractor throughout the task

Proportionality

- A judgement must be made based on many factors, e.g. risk, complexity of the work, the range of stakeholders, familiarity of a contractor vs someone new, location of the work etc.

- However, for low complexity tasks – this is less important

- Do need clarity on who is responsible

- See H&S Management Arrangements, Appendix 2 – Responsibility for health and safety in STFC

- Use the SC15 Appendices to guide your decisions

Guidance and information within the Code

- Appendix 2: Contractor selection SHE Checklist
- Appendix 3: Contract Supervising Officer SHE Checklist and Contract Signoff
- Appendix 4: STFC SHE Information for Contractors
  - (STFC Site Contractor Handbooks)
- Appendix 5: Guidance on risk assessment and method statements
- Appendix 8: Timeline activity summaries

Permits

- Permits will often be required where contractors staff are carrying out work
  - Note – Estates personnel may be considered as contractors for some tasks
- CSO's must ensure that all parties are aware of the requirements for permits, and which permits are to be issued
- All requests for a permit must be made in advance to the STFC team with control and competence for issuing permits – usually the Estates team
- Permits must never be requested on the day of work unless agreed in advance with the permit issuer, or in exceptional circumstances e.g. emergencies
- Those issued with a permit must retain control on the permit, abide by all conditions stated, and seek advice if this cannot take place
- All permits must be signed, and closed out, in the appropriate manner

All work involving radiation

- If the contracted work involves a radiation hazard of any description, the contractor must take advice from both their own Radiation Protection Advisor (RPA) and a STFC Radiation Protection Advisor to ensure full compliance with all relevant STFC Codes and radiation safety legislation

- Note: the contractors RPA and STFC's RPA must co-operate and exchange all relevant information

- The Contract Supervising Officer must participate in this consultation

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Contractor requirements

Before, during and after the job

Exercise 1: Review of RAMS

- What does a good Risk Assessment & Method Statement (RAMS) look like?

- Discuss the RAMS provided
  - What have they missed out?
  - Are they specific enough?
  - Have they considered all the STFC hazards that might affect their task?

- Summarise the issues you've observed and how you'd feed back to get to a suitable, mutually agreed set of RAMS

Requirements before work

- Carry out contractor selection – verify Appendix 2 has been considered
- Consider the competency of individuals
- Ensure the contractor is appointed – e.g. has a PO in place
- RAMS
  - Provision of RAMS by contractor
  - Review and comment on RAMS

- Permit requirements
  - Permit to work – issued by a competent person, and requested and agreed prior to work starting
  - Access permits – e.g. SI10 for ISIS (including training), RTF
  - Those issued with a permit must retain it and abide the conditions stated
  - All permits must be correctly signed off and closed

Requirements During Work

- All contractor are to be booked in – use Easy Lobby for visitors and short-term contractors
- ID requirements for contractor individuals are in place
- Check in – access requirements – do they have a pass or badge?
- Suitable parking/access for vehicles and equipment
- Ensure induction requirements are met – site and local area
- Introduce contractor to other affected parties present e.g. the STFC area owner, any local staff, and above all any other contractors in the area
- Cooperation and collaboration is key here
- Supervision and monitoring – evidence of this should be recorded

Supervision and Monitoring

- The primary functions of the Contract Supervising Officer are to carry out:
  - Inductions
  - Briefings (e.g. activities of STFC staff and the working environment, activities of other contractors etc.)
  - Provide liaison
  - Monitor the work
- You are not responsible for, and should not attempt to substitute for, the contractor's own safety management function

Routine and periodic monitoring

- Your regular presence and behaviour will strongly influence contractor behaviour:
  - Be visible at the location and practice careful observation
  - Ask questions with face-to-face communications and practice active listening
  - Seek clarifications where needed – please don't assume anything
  - Record monitoring activities, e.g. keep written evidence such as emails, diary entries, project paperwork and files etc.
- Fundamental question – Are they working safely in line with STFC SHE Codes and to the **agreed** Risk Assessments and Method Statements (RAMS)?

Issues that come up?

- Intervene early and make it very clear what is acceptable and what is not
- Are you seriously concerned?
- You are fully empowered to stop work until a resolution acceptable to both sides is agreed
- If necessary, obtain support from your line manager and SHE Group
- Report all incidents and concerns involving your contractor in Evotix, such as
  - Dangerous activities
  - Failure to follow RAMS or PTWs
  - Breaches of any codes – notably electrical codes, fire code, etc.

Exercise 2: Dealing with problems

- What issues could we foresee, and how can we manage these?
- In groups, prepare a summery of the actions that a CSO can employ to both prevent problems arising and dealing with them when they do
- Discuss and make use of examples from your own experience
- Use the imaginary scenario on the handout if necessary
- Emphasis is on positive solutions!

Requirements After Work Completion

- Is the work area clear – safe, tidy, and waste removed?
- Ensure any permits are signed off / closed out
- Sign off the task/work – contractor job sheet, attendance record etc.
- Ensure any site passes are returned
- Ensure the contractors leave site
- Take part in any review – e.g. comment on any SHE issues etc.

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Thank you

https://www.she.stfc.ac.uk