



HEALTH, SAFETY &
ENVIRONMENTAL MANUAL

10.1 Subcontractor Management Procedure

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SUBCONTRACTOR MANAGEMENT PROCEDURE

PURPOSE

The purpose of this procedure is to eliminate or reduce incidents and injuries by providing a framework for procurement, monitoring, and review of subcontractors. The pre-qualification process will help to ensure that subcontractors meet or exceed the requirements of the Occupational Health and Safety Act, applicable Regulations and J-AAR's Health, Safety and Environmental management systems prior to mobilization or starting work.

J-AAR requires that subcontractors' tasks be assessed, and preventative actions and controls are documented, communicated, implemented, and monitored by the applicable subcontractors. It is important to ensure these hazards are identified, assessed and controlled in a timely manner.

As part of the pre-qualification and validation of subcontractors, documents such as WSIB clearances and reports, insurance, training qualifications, and other specific requirements will be requested and checked by the project management or health and safety team.

Subcontractors will be evaluated either on completion of major work, or at random intervals to ensure the health and safety requirements of all workplace parties are met.

Violation of the responsibilities outlined may lead to removal of individual subcontractor employees from the project, or possible termination of the subcontractor contract with J-AAR.

DEFINITIONS

Contractor/Subcontractor:

External organization providing services to the organization in accordance with agreed specifications, terms, and conditions.

Service Personnel:

Delivery, transportation, testing, supplier, or monitoring companies who are not engaged in construction activities (must be escorted by J-AAR personnel while on the job site).



Visitor:

A visitor is a person who does not engage in any type of construction activity while on the jobsite.

SCOPE

This procedure applies to all subcontractors engaged in construction activities or performing work on projects, in facilities or seeking to be added to the approved subcontractor list. It does not apply to subcontractors used in emergency situations.

On multi-contractor or multi-employer sites, coordination, and integration of the OHSMS will be the responsibility of the constructor.

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Delivery, transportation, testing, supplier or monitoring companies, emergency contractors, and escorted visitors who are not engaged in construction activities, are exempt from pre-qualification requirements, however they must always be escorted. If any of the above will be exposed to hazards in the field without a J-AAR escort, they will need to take part in J-AAR's site-specific orientation, except for emergency situations where this requirement cannot be met.

A list of subcontractors who meet, or conditionally meet pre-qualification requirements will be maintained and used to ensure work is awarded to those who have been approved. The list will be managed by the health and safety team or their designate, in conjunction with the J-AAR administrator for contracts and estimating.

PROCEDURE

Prequalification Approval Process

J-AAR has developed a list of subcontractors they commonly work with. Subcontractors on this list take precedence over other contractors not on the list. Any exceptions must be justified due to specialty work, subcontractor availability or competitive pricing.

A J-AAR "Subcontractor Safety Package" has been developed (Section 16.1) and will be sent annually to the list of subcontractors referenced above. Subcontractors must review all items in the package and return to J-AAR any required documents.

Safety Package Items:

- Section 1: Subcontractor Guidelines
- Section 2: Project Safety Requirements
- Section 3: Subcontractor Submittals (return to J-AAR)
- Section 4: Safety Commitment and Acknowledgement (return to J-AAR)



A review of the subcontractor information will determine if criteria have been met. Results will be communicated to the project manager, administrator for contracts and estimating or a designate. Where criteria are met, the subcontractor will be deemed an approved subcontractor.

Subcontractors not legislatively required to have Health and Safety or Violence and Harassment in the Workplace policies and procedures, must agree to abide by J-AAR policies, practices, and procedures.

Non-Approval

Where the minimum criteria are not met, notification will be sent to the subcontractor giving them an opportunity to correct deficiencies, provide additional documentation or information. The health and safety team, project manager, administrator for contracts and estimating or designate may be contacted to discuss additional steps required to become qualified.

Subcontractors will not be added to the approved list until all criteria are met.

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Selecting a Subcontractor and Awarding Work

When a purchase order or contract is awarded to a subcontractor, the J-AAR project manager or their designate will check the approved subcontractor list. If the subcontractor is not pre-qualified and approved, J-AAR will send them the Subcontractor Safety Package.

Where the subcontractor is on the approved list, the project manager, health and safety team or a designate must request a revised list of supervisors and workers attending the project, so that records of training can be verified, and confirm all documents are up to date. Once completed, the subcontractor can be awarded the contract.

Competency

Subcontractors must have and maintain the required competency, licensing, training, skills, and experience to identify, assess and control hazards arising from their scope of work.

All training required by the O.H.S.A., and/or Regulations must be current and maintained.

To assist subcontractors with less than 5 workers, or who do not have a full OHSMS that meets or exceeds J-AAR's requirements, J-AAR will provide copies of policies, and safe work procedures applicable to the scope of work. These policies, and procedures are a minimum requirement. The J-AAR Form B must be completed.

All subcontractors are responsible to review applicable policies, and procedures with their workers prior to mobilizing or starting work and are required to maintain and have training records available for review.

Orientation, including safety policies, site specific safety plans, environmental plans, emergency and rescue plans, site and company rules, rights, duties and responsibilities of the workplace parties, and violence and harassment must be communicated to workers prior to mobilization or start of work.



Failure to train workers may result in progressive discipline up to and including the subcontractor being temporarily or permanently removed from site and removal from the pre-approved subcontractor list.

Subcontractors must submit a "Supervisor Competency" form (Form A) for any of their supervisors working on the project, prior to work starting.

Subcontractor records, required licenses, and certificates must be maintained and be provided upon request.

Hazard Assessments and Safe Work Procedures

Subcontractors are required to carry out hazard risk assessments for their planned scope of work activities. Assessments shall include documented hazard identification, and control for all identified hazards. The hierarchy of controls must be applied to methods of control to ensure the lowest possible risk. Safe work procedures and practices must be included as part of the hazard and risk assessment process.

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There are three main tools used to identify hazards, each of them performed at various levels and intervals:

1. Corporate Hazard Identification and Risk Assessment -a corporate database of the hazards in the company scope of work
2. Project Level Hazard Assessments- identify hazards and controls of a project, in advance of the project.
3. Daily Job Hazard Assessments (JHA's)- conducted at the field level to identify immediate hazards.

Subcontractors are required to submit a Project Level Hazard Assessment and JHA's to J-AAR. They shall be completed in full by a competent person who can assess task hazards and implement the appropriate controls to mitigate the probability of an incident occurring.

The subcontractor must ensure they provide a competent person who clearly understands the need to communicate unsafe acts and conditions. J-AAR expects this person to be competent in exercising the safety hierarchy of controls to mitigate an incident occurrence.

The Project Level Hazard Assessment must be submitted prior to the work starting and the JHA's must be submitted to the J-AAR project team at the end of every week.

If the subcontractor is unable to provide these documents, or does not have access to these documents, J-AAR will provide copies for their use.

In addition, risk hazard assessments must:

- Be completed prior to mobilization or starting work as applicable.
- Be carried out daily for planned activities.
- Include identified risks arising from the work to the subcontractors and other workers.
- Include hazards impacting other work groups, visitors, and the public.
- Be discussed in open two-way communication with all affected workers.
- Be revised if work conditions, schedule or other changes impact the scope of work.
- Be available for review.

Reassessment



Where the scope, method, or timing of work changes for any reason including schedule, work conditions, weather or subcontractor activities not previously considered:

- The hazard identification, assessment and controls must be reviewed and revised by the competent person who completed them.
- Changes must be communicated to involved workers and J-AAR project management.

Communication of change

Subcontractors are responsible for assessing and communicating significant changes including scope of work, schedule, working conditions, hazards and risks and controls to:

- J-AAR supervisor

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- J-AAR project manager or designate.
- All involved workers.

Subcontractors must:

- Identify where their scope of work may impact another contractor.
- Identify where another contractor's work may impact their workers.
- Coordinate and communicate with other contractors or employers on site.
- Implement, train, and communicate requirements.

Forms

Subcontractors are required to complete all forms and permits applicable to the work, including but not limited to:

- Sign in / sign out forms
- Site specific orientation
- JHA's
- Weekly safety talks
- Confined space entry forms.
- Traffic protection and signaler forms
- Workplace inspections
- Excavation inspections
- Lock out / tag out
- Incident, hazard identification and investigation forms.

Monitoring Safety Performance



Compliance audits will be carried out randomly throughout the project and specifically as deemed necessary.

Targeted compliance audits may be conducted where:

- High risk work including critical tasks have been identified.
- Blitz activities where patterns of incidents or noncompliance are apparent.
- Part of the regular supervisor, JHSC, safety representative, or management inspection protocol.

Audits used to evaluate subcontractor compliance may include but are not limited to:

- Meeting requirements of the OHSA, and applicable Regulations.
- Compliance with safety plans, policies, procedures, and hazard assessments.
- Communications protocol and regulatory requirements.
- Supervision requirements.
- Training and communication requirements.
- Supervisor, safety rep and JHSC inspections.
- Housekeeping and environmental requirements.

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Noncompliance with Requirements

Subcontractors not complying with requirements of this policy or who fail to implement corrective and preventive actions after a compliance audit will:

- Be required to make the changes to comply immediately or as agreed.
- Be subject to progressive discipline up to and including temporary or permanent removal from site.

In addition, subcontractors may be placed on a **DO NOT USE** list until OHSMS requirements are satisfied prior to being reconsidered.

Evaluation and Reassessment

Subcontractors will be periodically re-evaluated and evaluated once their work on a project is complete. They may be required to re-qualify as the result of an incident, or noncompliance with OHSMS requirements as determined by the health and safety team, supervisor, project manager or designate.

Post project evaluations will include:

- Review subcontractor overall safety performance and compliance.
- Incidents, and hazard experiences.
- Proactive hazard reports.
- Communications, orientation, and training.
- Implementation of safe work procedures.
- Use of tools and equipment.
- Determining corrective actions or improvements required where necessary.
- Determining status including removal or remaining on the approved subcontractor list.