

Contractor Safety Management Procedure

Section 1 - Purpose and Scope

(1) The University of Queensland (UQ) engages contractors to deliver scope/s of work or task/s where there is a level of expertise or at a volume that cannot be satisfied by UQ workers. This Procedure outlines the requirements for the engagement of contractors at UQ for managing their safety. This Procedure provides information about the minimum requirements and controls that must be considered and implemented throughout the various stages of the contractor lifecycle.

(2) UQ's legislative obligations for managing contractor safety are provided under the [Work Health and Safety Act 2011](#). UQ cannot delegate its obligations under [WHS legislation](#) through the outsourcing of work to a contractor.

(3) This Procedure outlines the duties and legislative obligations, and key UQ policies, and procedures to ensure the safe conduct and delivery of services by contractors and applies to all contractors engaged by UQ for work undertaken at all UQ locations, including sites other than UQ locations. This Procedure should be read in conjunction with the following:

- a. [Contractor Matrix](#)
- b. [Procurement Procedure](#)
- c. [UQ Contractor Engagement and Management Guide](#).

Scope

(4) For the purposes of this Procedure, a contractor is an individual or organisation engaged under a contract / agreement (other than as an employee) to provide services to UQ. Contractors included in the scope of this Procedure are:

- a. suppliers of services engaged under a contract for an agreed price;
- b. consultants (contractors for consulting services engaged to provide recommendations and specialist or professional advice to assist or influence University decision making);
- c. suppliers of professional or academic services;
- d. contractors providing contingent or temporary workers;
- e. suppliers of major capital and infrastructure works;
- f. principal contractors;
- g. all subcontractors who may be engaged by a contractor; and
- h. suppliers engaged during set-up and management of events.

(5) The Contractor Engager and Contractor Supervisor have specific responsibilities under this Procedure. They are the UQ person responsible for sourcing, engaging and monitoring the contractor and are nominated to the contractor as the representative of the University for the purposes of the contract work.

Exclusions

(6) This Procedure does not apply to:

- a. contractors directly engaged by a commercial tenant as agreed and defined in a formal agreement or contract;
- b. couriers, delivery drivers, bus drivers; and
- c. suppliers working on UQ locations, that have not been engaged by UQ, such as Urban Utilities or Energex.

Section 2 - Process and Key Controls

(7) The following requirements apply to all contractor engagements, or proposed contractor engagement at UQ:

- a. Contractor engagers will categorise contractors using the [Contractor Matrix](#) to determine type of contractor required for engagement.
- b. Contractors will be appropriately procured in accordance with UQ's [Procurement Policy](#) and [Procurement Procedure](#) and all other relevant policies and procedures.
- c. All contractors will be appropriately inducted based on the [Contractor Matrix](#) and records provided.
- d. Contractors will be monitored on-site throughout the engagement by the contractor supervisor.
- e. Contractor performance will be assessed and documented by the contractor supervisor.
- f. Contractor incidents will be reported in UQ Safe either by the contractor, or the contractor supervisor.
- g. All health and safety records relating to the engagement of the contractor will be stored in accordance with the [Records Management Procedure](#).

Section 3 - Key Requirements

Categorisation of Contractors

(8) UQ engages diverse types of contractors with varying degrees of health and safety risks. This Procedure sets out a risk-based framework to be incorporated into each stage of the contractor management lifecycle, specifically:

- a. sourcing;
- b. engaging and on-boarding;
- c. management; and
- d. exit.

(9) The contractor engager is responsible for appropriately categorising the proposed contractor using the [Contractor Matrix](#) prior to the commencement of the engagement. Contractors will be categorised to determine the type of engagement, to inform the level of risk exposure, and to assist in the level of control required to manage the safety of the contractor. Factors for consideration in understanding the level of risk exposure to contractors may include the following:

- a. type of task/s to be undertaken;
- b. environment in which they will be working; and
- c. length of engagement.

Risk Assessment

(10) UQ and the contractor both have a shared duty to ensure that potential hazards associated with the contracted work have been assessed with controls implemented to mitigate risks prior to commencing the work.

(11) The contractor engager must ensure the contractor has systems in place for effective management of risk throughout the lifecycle of the engagement. Consideration of any potential impact on the UQ community from the

contractor's work must also be identified and controlled, and where applicable, communicated.

(12) The contractor engager must also communicate any hazards and risks associated with UQ's operations and environment that may impact on the contractor while they are undertaking work.

Sourcing - Due Diligence

(13) Contractor engagers must follow UQ's [procurement framework](#) in considering whether to engage a specific contractor.

(14) When engaging a contractor, the following must be considered:

- a. where the contractor will be working and known hazards/risks present in the work environment;
- b. the work to be undertaken and the level of control UQ has over the work;
- c. specific skills, licenses or competencies required to safely undertake the work;
- d. previous health and safety performance; and
- e. evidence of an established health and safety management system.

Engagement and On-boarding

(15) The contractors' health and safety obligations must be communicated prior to the commencement of work. This is done through the sourcing, engaging and on-boarding stages.

(16) The contractor supervisor must ensure the contractor has assessed the risk associated with the planned work and they have a method for controlling the risks throughout the duration of the work.

Submission of Health and Safety Documentation

(17) During the engagement and onboarding stage, the contractor engager must ensure the contractor submits documented evidence of their health and safety management system - the requirements of which will depend on the category of the contractor engagement.

(18) Examples of documented evidence may include:

- a. licenses, competencies, and qualifications;
- b. permits to work;
- c. safe operating procedures;
- d. risk assessments;
- e. safety management plans; and
- f. safe work method statements, where the contracted work includes high-risk construction activities and as otherwise required by the contractor's health and safety management system.

Contractor Induction

(19) Prior to the commencement of work all contractors must undertake an induction provided by UQ. All inductions must be according to the category of contractors outlined in the [Contractor Matrix](#). Records of induction must be maintained by the contractor engager.

(20) These induction requirements include the following:

- a. completion of UQ's online inductions relative to the category of engagement; and
- b. local site induction / orientation.

Consultation and Communication

(21) Consultation must occur between UQ and contractors where work undertaken by the contractor may impact on the UQ community. This consultation should extend to the UQ community and/or specific Organisational Units where the contract work may have an impact on comfort levels or directly on health, safety and wellbeing. The agreed outcomes of this consultation must be communicated to those persons that may be affected.

(22) Consultation and the resulting communication must occur prior to any work commencing so that it is genuine.

Management

(23) The management phase involves effective consultation, coordination, and cooperation between UQ and contractors to ensure that WHS systems are in place and are operating effectively to manage risks to the health and safety of contractors and the UQ community so far as is reasonably practicable.

Site Access

(24) The contractor will report to the contractor supervisor, or delegate, upon arrival at the University to perform work.

(25) Where specific sign-in requirements are in place (e.g. at Security office or other designated locations), contractors must sign in and out each day at the same designated location.

(26) Where a contractor is required to work outside of normal University working hours, the contractor supervisor must make alternative sign in - sign out arrangements for the contractor.

Supervision

(27) For the purposes of this Procedure, supervision means the level of oversight required for the specific contractors during the engaged works. This does not involve directing the work itself or instructing the contractor on how to complete the work.

(28) The level of supervision will be influenced by the:

- a. working environment;
- b. type of tasks; and
- c. length of engagement.

Monitoring

(29) The contractor supervisor will maintain contact with the contractors, providing periodic monitoring of conformance with relevant UQ procedures, [WHS legislation](#) and the contractor's own risk assessment documents.

(30) Under a Principal Contractor arrangement, principal contractors will self-report to the contractor supervisor to enable effective monitoring of implementation and effectiveness of risk controls.

(31) UQ will inspect the work of the contractors periodically (as applicable) and document non-compliances. These issues will be raised directly with the contractor and recorded against the contractor's profile. The contractor engager/contractor supervisor must suspend work if they believe the work poses a risk of harm to the contractor or to the UQ community and may request contractors are removed from UQ locations for serious breaches of health and safety matters.

Incident Reporting

(32) The contractor is to report any workplace illness, injury or near miss to the contractor supervisor/contractor engager as soon as practicable. The contractor is to record the incident in [UQSafe](#) in accordance with the [Health and](#)

[Safety Incident and Hazard Reporting Procedure](#). If a contractor does not have [UQSafe](#) access, the contractor supervisor will report the incident in [UQSafe](#) and provide a copy of the report to the contractor.

(33) UQ may participate in incident investigations with the contractor although reserves the right to conduct its own investigation. Any inspection, correspondence, or corrective actions issued by a relevant regulatory authority relating to a UQ contractor must be reported to the contractor engager/contractor supervisor.

Notifiable Incidents

(34) UQ and the contractor have a dual obligation under the [Work Health and Safety Act 2011](#) to notify the regulator ([Workplace Health and Safety Queensland](#) or the [Electrical Safety Office](#)) of notifiable incidents. It is preferable for the contractor (PCBU) to notify the regulator of a notifiable incident. Where UQ has evidence this has occurred, it is not necessary for UQ to duplicate the notification. If this does not occur, or it is not possible for the contractor to notify the regulator, then UQ will make the notification.

(35) The contractor supervisor / contractor engager must contact the Health, Safety and Wellness Division (HSW Division) immediately after becoming aware of a notifiable incident. If necessary, the HSW Division will notify the regulator on behalf of UQ. The scene of a notifiable incident must be preserved until such time as it has been released by the regulator or a police officer, unless there is a need to:

- a. save a life;
- b. relieve suffering or prevent further injury to persons; or
- c. remove a deceased person.

Exit

(36) Once the work has been completed, the contractor's health and safety performance should be assessed, and the records of the appraisal stored. Upon completion of the engagement, all contractor access should be cancelled, including the retrieval of any access keys or cards.

Performance Evaluation

(37) The performance of the contractor will be reviewed, based on the monitoring of activities, consultation, incidents and management of incidents, induction of subcontractors etc. The review may include data collected as part of monitoring activities.

(38) A review of contractors will be conducted periodically. The intent is to assess the contractor's safety performance to determine their suitability for continued engagements. Serious or repeated non-conformances or negligence may result in contractor use being discontinued by being removed from UniFi.

Section 4 - Roles, Responsibilities and Accountabilities

Heads of Organisational Units

(39) Heads of Organisational Units must:

- a. Ensure adequate resources have been allocated to implement this Procedure in areas under their control.
- b. Ensure that persons engaging contractors within their organisational unit have been provided with training appropriate to the task.

Managers and Supervisors

(40) Managers and Supervisors are responsible for the implementation of this Procedure in their areas of responsibility for contractors engaged under their control.

(41) They must ensure:

- a. UQ workers have the ability to supervise the day-to-day management of the contractor and that the processes for engagement have been followed; and
- b. persons engaging contractors within their Organisational Unit have been provided with training appropriate to the task.

Contractor Engager

(42) Contractor engagers must:

- a. Ensure that the scope of work is clearly defined for the contractor.
- b. Verify that the contractor has completed all University inductions and training.
- c. Ensure that risk management documentation has been submitted and is appropriate to the tasks being undertaken.
- d. Verify that the University has received any applicable licenses, permits and certificates that are required to perform the work.
- e. Communicate any hazards and risks associated with UQ's operations and environment that may impact on the contractor while they are undertaking work.

Contractor Supervisor

(43) The Contractor Supervisor is responsible for the oversight, coordination and the management of the contractor during the required works on a UQ location. They are responsible for:

- a. day to day interaction;
- b. contractor sign-in/ sign out;
- c. monitoring of the works;
- d. monitoring compliance with UQ requirements;
- e. reporting of any non-conformances;
- f. local inductions;
- g. maintaining two-way, open communication with contractors and work collaboratively with them to eliminate and control identified risks;
- h. ensuring the contractor is provided with specific instructions on local procedures, requirements and emergency provisions for which UQ has control; and
- i. reporting incidents in [UQSafe](#) (in the absence of contractor [UQSafe](#) access).

Health and Safety Managers and Coordinators

(44) Health and Safety Managers and Coordinators must:

- a. Provide assistance and advice to Heads of Organisational Units, Managers and Supervisors, contractor engagers and contractor supervisor on health and safety matters relating to contractor safety.
- b. Assist in investigation of contractor incidents.
- c. Verify the details of incident and hazard reports, and associated action plans in [UQSafe](#).

- d. Participate in the monitoring and evaluation of contractor safety performance where required.

Enterprise Procurement

(45) Enterprise Procurement must:

- a. Support contractor engagers in responding to contractors with an appropriate response regarding safety performance.

Section 5 - Monitoring, Review and Assurance

(46) The HSW Division will review this Procedure as required to ensure that it remains accurate and relevant to the safety management of contractors UQ.

(47) The safe management of contractors must be communicated to those that engage contractors for work at a UQ location. Any incidents that occur with contractors should be discussed at Health, Safety and Wellness Committee meetings.

(48) Compliance with this Procedure may be subject to internal and external audits.

Section 6 - Recording and Reporting

(49) The contractor engager is to maintain all health and safety records associated with the contract work in accordance with the record keeping procedures at UQ.

(50) The relevant contractor engager must retain, or have access to, records which may include (as applicable):

- a. requests for tenders / quotations and submissions by the contractor;
- b. contracts, service agreements;
- c. completed pre-qualification forms / contractor registrations;
- d. completed contractor induction checklists;
- e. completed Risk Assessments;
- f. completed Safe Work Method Statements;
- g. incident investigation reports related to the works;
- h. completed Contractor Site Observation Checklists;
- i. completed Contractor Evaluation Checklist;
- j. records of non-conformances observed, including reports, photographs, and other relevant information; and
- k. other notes or emails relating to discussions about health and safety and the contract works.

Section 7 - Appendix

Definitions

Terms	Definitions
Contractor	an individual or organisation engaged under a contract (other than as an employee) by UQ to perform work, carry out a service, or provide labour hire. This includes consultants, companies, sub-contractors, and workers engaged or caused to be engaged by contractors.

Terms	Definitions
Contractor Engager	the UQ person responsible for determining the scope of work, sourcing, engaging and may also be monitoring the contractor while on site; and is nominated to the contractor as the representative of the University for the purposes of the contract work. The contractor engager can also be the contractor supervisor.
Contractor Supervisor	the UQ person responsible for managing the day-to-day activities of the contractor as the representative of UQ for the purposes of the contract work. It is the person who guides the contractor and monitors the work they undertake on site. The contractor supervisor can also be the contractor engager.
Commercial Tenant	an individual or corporation who rents, or leases, a commercial property for the purposes of conducting business or commercial activity.
Due Diligence	in the context of work health and safety—means taking every precaution that is reasonable in the circumstances to protect the health, safety and welfare of all workers and others who could be put at risk from work carried out as part of the business or undertaking.
Principal Contractor	an individual or organisation that commissions building and construction work (construction projects >\$250).
Contract Lifecycle	automates and streamlines contract processes during key stages.
Safe Work Method Statements (SWMS)	document that sets out the high-risk construction work activities to be carried out at a workplace, the hazards arising from these activities and the measures to be put in place to control the risks.
Sub-Contractor	Any person or business entity engaged by the contractor to assist with the contracted work.
Workplace	for the purpose of this document, a place where work is undertaken for or on behalf of the University.
UQ Locations	for the purposes on this Procedure, means any campus, site or facility owned or controlled by UQ or where a UQ business or undertaking is performed.
UQSafe	UQ's cloud based on-line incident, hazard and near-miss reporting system.

Status and Details

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