Contracted Labor Safety Training

I. Scope and Purpose: This procedure applies to all vendor supplied labor services to Plant Ops, as defined below, to ensure that these workers are adequately incorporated into our safe working environment and that all requirements for compliance with governmental regulations are maintained.

II. Definitions:

*Vendor contract for labor services* – a contractual agreement between the University and an outside firm to provide workers to work directly under the supervisory control of University employees.

*Vendor supplying labor services* – an outside private firm providing workers to work directly under the supervisory control of University employees as agreed upon through a contractual agreement.

*Site specific safety training for contracted labor* – training for contracted labor workers about the specific University procedures for complying with governmental safety, health and environmental regulations and University safety, health and environmental policies and procedures, beyond the typical generic safety training for compliance requirements of the governmental safety, health and environmental regulations.

*Contracted labor worker* – a worker that receives pay from a private firm outside of the University, through a vendor contract for labor services, for work performed at the University while under direct supervisory control of a University employee.

*Generic safety training* – training meant to teach contracted labor workers about the general compliance requirements of governmental safety, health and environmental regulations, without specific information about policies and procedures that are followed at individual work sites (e.g., UM).

*Contracted labor safety training record* – a document designed to affirm and communicate the relevant generic safety training received by a contracted labor worker prior to that worker arriving at the University to work under a vendor contract for labor services.

III. Procedure:

A. Each person working for Plant Ops through a vendor contract for labor services, whether on a temporary or permanent basis, and working under the direct control of a Plant Ops supervisor or other Plant Ops employee, is considered a Plant Ops employee for the purposes of compliance with MIOSHA regulations.

B. MIOSHA requires that certain workers, depending on their work assignments, be trained on certain topics for compliance before they begin working and/or at certain time period intervals. These requirements apply to workers working for Plant Ops through a vendor contract for labor services, as described above.
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C. Vendors supplying contracted labor workers may train the workers supplied through a vendor contract for labor services on the generic safety training information required by MIOSHA before these workers arrive at Plant Ops to work. In situations where this has occurred, the vendor must supply a signed contracted labor safety training record showing that this generic safety training has occurred. The preferred method for reporting this training is the Contracted Labor Safety Training Record (see attached). The signed training record must be supplied before a worker under a vendor contract for labor services will be allowed to work for Plant Ops. The content of vendor supplied generic safety training is subject to review and approval by OSEH to ensure adequacy.

D. Once a signed contracted labor safety training record for a worker under a vendor contract for labor services has been supplied to Plant Ops, this worker must then go through the Plant Ops site specific safety training for contracted labor before being allowed to begin work. The contents of this training must be reviewed and approved by OSEH.

E. Several MIOSHA training requirements include retraining at regular intervals (typically, annually). An updated signed contracted labor safety training record for generic safety training must be supplied annually for each worker under a vendor contract for labor services showing that the required MIOSHA compliance retraining has occurred. Contracted labor workers must also attend an annual site specific safety retraining. Contracted labor workers without an annual updated signed contracted labor safety training record for generic safety training from their vendor and who have not attended annual site specific safety training will not be allowed to continue to work for Plant Ops.

F. Workers under a vendor contract for labor services that do not have signed safety training records from their vendor as outlined above, and have not attended site specific safety training for contracted labor, must either participate in Plant Ops regular safety training program by having a New Hire Safety Training Checklist completed by their supervisor before beginning work and attending the regular safety compliance training (e.g., safety orientation training, annual safety refresher training, etc.) which is given to all regular permanent Plant Ops employees on a regularly scheduled basis, or not be allowed to work.

G. All training records (i.e., vendor supplied signed safety training records, and the Plant Ops site specific safety training for contracted labor) will be entered into the Plant Ops training management system for tracking, accountability and compliance reporting.

IV. Attachments:

Contracted Labor Safety Training Record
New Hire Safety Training Checklist