EXPRO National Manual for Projects Management

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Project Sub-contractor HSSE Evaluation, Selection & Monitoring Plan

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Table of Contents

1.0 PURPOSE

The purpose of this Plan is to establishes a standard and defines the Health, Safety, Security and Environmental, (HSSE) criteria and process to be applied to Subcontractors. It includes identification of risk, subcontractor evaluation, selection and compliance. For this procedure, "Subcontractor" is used to mean subcontractors or contractors responsible for performing work under another contractor's direction in its three possible roles as general contractor, construction manager and agent, or private contractor acting in its own name; and "subcontract" is used to mean subcontract or contract as used in three possible roles as general contractor, Construction Manager and agent, or private Contractor acting in its own name.

2.0 SCOPE

The scope of this plan applies to all works performed under all Government Construction Contracts executed throughout the Kingdom of Saudi Arabia.

3.0 DEFINITIONS

When evaluating contractors as potential bidders and selecting successful bidders to perform work, the following definitions apply:

Definitions	Description
Accident:	Any undesired circumstances that give rise to injury; damage to property, plant, or the environment; production losses; or increased liabilities.
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.
ALARP:	As Low As Reasonably Practicable
Contractor	One that agrees to furnish materials or perform services at a specified price, especially for construction work.
Hazard:	An object, physical effect, or condition with the potential to harm people, property or the environment.
HSSE	Health, Safety, Security and Environmental
Incident:	Any occurrence, event or series of events which results in injury to any person, damage to equipment, plant, or environment.
Incident Rate:	The number of injuries, or lost workday cases related to a common exposure base to permit industry comparisons and perform trend analysis between firms regardless of size. This rate is calculated as: $\frac{N \times 200{,}000}{EH}$ Where: **N** = Number of recordable injuries or lost workday cases **EH** = Total hours worked by all employees during calendar year **200,000** = Base for 100 full-time equivalent employees (working 40 hours per week,50 weeks per year)
JHA	Job Hazard Analysis
PPE	Personal Protective Equipment
RFP	Request For Proposal
Risk:	The product of the chance that a specific undesired event will occur and the severity of the consequences of the event.
Risk Assessment:	An evaluation of exposure to potential loss, which can be quantitative. Not to be construed as a formal regulatory definition.
Subcontract:	Refers to Subcontracts and Purchase Orders
Subcontractor:	Refers to Subcontractors, Suppliers and Vendors

3.1 Status Categories

Subcontractors are either “acceptable”, “conditionally acceptable” or “unacceptable” to work on sites. This must be defined based on the risk associated with the work to be accomplished, availability of Subcontractors able and willing to perform the work and the degree of control the Responsible Contractor has over the selection process.
Attachment 4 can be used as an example of evaluation criteria that can be used to assess a potential subcontractor’s status.

4.0 REFERENCES:

- Project Incident Notification, Investigation and Reporting Procedure- EPM-KS0-PR-000001

5.0 RESPONSIBILITIES

The nature of the work determines the level of the Responsible Contractor’s oversight required. For example, more company oversight is required on facilities performing high risk activities than on a site with low risk activities. Responsibility for supervision rests with the Subcontractor, the Responsible Contractor’s role should be to monitor compliance to contractual terms and systems as detailed in the subcontract.

The Subcontractor’s site representatives/manager should ensure that the Subcontractor:

- Meets the commitment to HSSE issues.
- Complies with all HSSE related clauses in the contract and the HSSE Plan.
- Uses internal HSSE control system(s).
- Monitors the quality, condition and integrity of his equipment and tools.
- Holds regular toolbox and HSSE meetings.
- Implements and participates in emergency exercises and drills where applicable.
- Manages risks which arise from changes to the HSSE Plan.
- Complies with incident and near-miss reporting, investigation and follow-up.
- Resolves interface problems.

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 subcontract requirements. 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 HSSE Plan.

Inspection 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 HSSE performance.

5.1 Additional Duties

In addition to the general responsibilities applicable to the implementation of all Responsible Contractor Processes, the following specific responsibilities are applicable to this Process:

5.1.1 Responsible Contractor

Compliance with any regulation, standard, or statute that applies to the Subcontractor's or its lower-tier subcontractors' work.

5.1.2 Contracts

Responsible for:

- Ensuring that any Bidders List is maintained.
- Implementing the HSSE Contracting Method to be used for contractual work.

5.1.3 Subcontractors

Responsible for the selection and qualification of its lower-tier subcontractors. It is the responsibility of each subcontractor, and its lower-tier subcontractor working at the site to comply with applicable statutes, codes, regulations, standards and contract requirements.

5.1.4 HSSE Manager

Responsible Contractor HSSE Manager is responsible for:

- Conducting the risk assessment of 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 HSSE evaluation.
- Assuring adequacy of Subcontractor submittals to meet Responsible Contractor requirement if the subcontractor must use the Responsible Contractor Program.

5.1.5 Site Supervision

Responsible for ensuring on-going monitoring of the Subcontractors while on a Responsible Contractor managed site to assure that the Subcontractor conforms to applicable Responsible Contractor HSSE contract requirements.

6.0 RISK ASSESSMENT

Prior to the development of a Bidder's List for a specific scope of work, a risk assessment (using a format like Attachment 2) shall be prepared by HSSE to evaluate any potential dangers in the work to be performed. This assessment is to ensure that the potential adverse consequences of identified dangers to employees, the public, the environment, and assets are understood and conveyed to bidders by Contracts.

Attachment 3 provides a sample checklist for performing a subcontractor work risk assessment. The risk assessment is to identify and evaluate the risks associated with the scope of work in the following categories:

- Risks to safety and health. (Employees, the public, etc.)
- Risks to the environment.
- Risks to equipment and property.
- Risks to Responsible Contractor's established HSSE objectives.

In conducting the risk assessment, HSSE shall identify the level of risk associated with the proposed work activities in accordance with the following criteria:

- Severity of potential adverse consequences.
- Probability that the incident will occur during contract performance.

By identifying and understanding both the severity and the probability of risk occurring, HSSE will be able to quantify and qualify the potential for incident occurrence for the proposed scope of work. This information is then used in the selection of Subcontractor(s) from the Bidder's List who are most appropriate to perform the work with the least likelihood of incurring risk.

Table 1 provides the guidelines to be used when assessing risk severity (see Attachment 2 for further explanation of risk severity). **Table 2** describes the levels of probability. Together, the severity ratings and probability levels are used to quantify and qualify the risks assessed for the scope of work. These are combined in the Risk Assessment Matrix in **Table 3**:

Table 1: Explanation of Severity Risk Ratings (see also Attachment 2)

SEVERITY RATING	POTENTIAL CONSEQUENCES/IMPACTS			
	PEOPLE	**ENVIRONMENT**	**HSSE Objetives**	**Liability/ Exposure**
0	No Injury	No Effect	No Concern	No Loss
1	Slight Injury	Slight	Slight	Slight Loss
2	Minor Injury	Minor	Limited	Limited Loss
3	Major Injury/Illness	Localized	Considerable	Considerable Loss
4	Single Fatality	Major	Major	Major Loss
5	Multiple Fatalities	Massive	Major International	Catastrophic Loss

Table 2: Explanation of Risk Probability Levels

PROBABILITY LEVEL	PROBABILITY TEST	
	PROBABILITY	DEFINITION
A	Unlikely	Incident never heard of/not known to have occurred
B	Rare	Incident known to have occurred in the construction industry
C	Possible	Incident has occurred in Responsible Contractor
D	Likely	Incident occurs several times per year in Responsible Contractor
E	Very Likely	Incident occurs several times per year at similar project/location

Table 3: Risk Assessment Matrix (showing assessed risk levels as "low," "medium" and "high")

SEVERITY RATING ↓	PROBABILITY LEVEL → INCREASINGLY LIKELY				
	A	B	C	D	E
0	LOW	LOW	LOW	LOW	LOW
1	LOW	LOW	LOW	MEDIUM	MEDIUM
2	LOW	LOW	MEDIUM	MEDIUM	HIGH
3	MEDIUM	MEDIUM	HIGH	HIGH	HIGH
4	MEDIUM	HIGH	HIGH	HIGH	HIGH
5	HIGH	HIGH	HIGH	HIGH	HIGH

Once HSSE has assessed the level of risk associated with the scope of work, the specific risk rating (from Table 3) is conveyed to Contracts. For example, a rating of "1C" would represent a "low" level of risk. Whereas, a rating of "4D" would be considered "high" risk for the scope of work. Contracts will refer to this rating when preparing Bidder's Lists. Once proposals have been received, the risk assessment is used again to determine if the potential Subcontractor has properly addressed risk elimination or reduction in their proposed approach to work performance.

The Risk Categories in Table 3 are to be applied as follows:

- **Low:** Risk is considered negligible; no formal controls may be necessary. Manage with routine procedures. Still should be As Low As Reasonably Practical (ALARP) and reviewed as part of a continuous improvement effort.
- **Medium**: Risk reduction measures should be developed to reduce/control the hazard to ALARP. Responsibility assigned for action and future monitoring. Other means of assessment may be considered to ensure accurate assessment of risk.
- **High:** Unacceptable risk that must be eliminated or reduced by controls to an acceptable level and ALARP. Responsibility assigned for action and on-going monitoring. Other means of

assessment and planning must be considered to ensure accurate assessment and management of risk.

The level of risk assessed determines the applicability of this Procedure, as shown in **Table 4**:

Table 4: Determination of Applicability (based upon level of risk)

Contracting Element	ASSESSED RISK LEVEL		
	HIGH	MEDIUM	LOW
Risk Assessment & Planning (Bid List, Request For Proposal RFP, etc.)	R	R	R
Pre-Qualification	R	O	O
Subcontrator Selection	R	O	O
Subcontractor Mobilization	R	R	O
Subcontractor Performs Work	R	R	O
Close-out & Evaluation	R	R	O
R = Required O = Optional			

7.0 REQUIREMENTS

There are two basic methods for ensuring Subcontractor HSSE compliance. The two contracting or compliance methods are:

- **Subcontractor provides their own HSSE Programs:** The Subcontractor must submit their existing HSSE Program, at the time of Proposal submittal, for Responsible Contractor review and acceptance. This is to assure that their program meets or exceeds Management Instruction HSSE as well as all of the applicable HSSE processes. Under this approach, the Subcontractor will work to its own standards once Responsible Contractor has accepted them.
- **Subcontractor Adopts Responsible Contractor HSSE Programs:** Under this approach, the Subcontractor agrees to adopt Responsible Contractor HSSE program requirements as their own while performing the contracted scope of work. At the time of Proposal submittal, the Subcontractor will also provide sufficient documentation to confirm their ability to meet the Responsible Contractor HSSE Program. Under this method, the project needs to develop and distribute to potential subcontractor(s) a program appropriate to the project and the work to be performed. The subcontractor will demonstrate that they are capable of and agrees to work to these standards. Development of the standards and supporting documentation must be performed prior to mobilization of the subcontractor to perform work.

The selection of either method is the responsibility of HSSE and Contracts to develop and implement and is based upon several factors. These factors include but are not necessarily limited to:

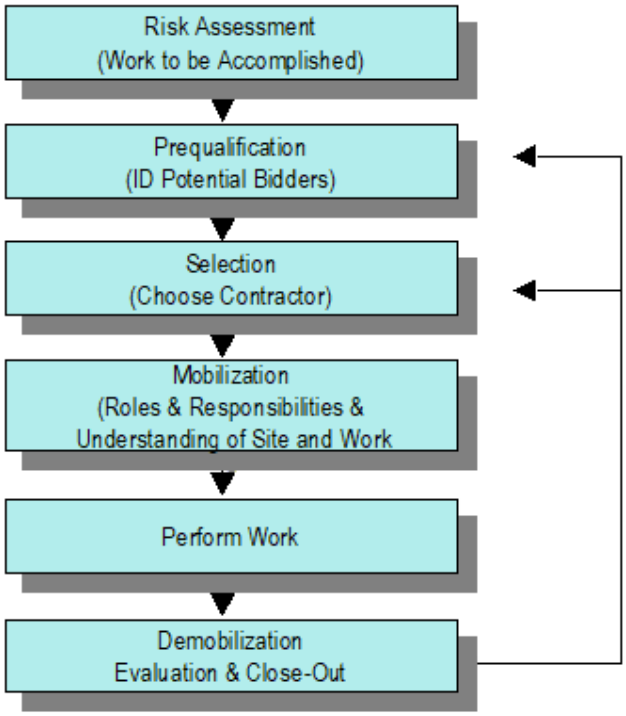
- The nature/scope of the work to be performed.
- The intended duration of the contract work.
- The size and classification of the proposed contracting organization.
- Known information about the Subcontractor (e.g., Qualifications Questionnaire, previous history of work performed, etc.)
- The relative sophistication of Subcontractor's HSSE programs/culture.

7.1 Process

This section describes the HSSE requirements and steps to pre-qualify, select, administer, and assess a Subcontractor's suitability to work on a Responsible Contractor managed site.

For ease in understanding, a shortened version of the process flow is given in Figure 1 as an introduction to the process description. A more complete process flow is given in Attachment 1.

Fig 1. Simplified Process Flow



7.2 Pre-Qualification

Responsible Contractor considers safety a primary consideration in the selection of companies invited to submit bids and in awarding subcontracts on Responsible Contractor projects. Therefore, in determining whether a company's historical and current HSSE performance are acceptable, the following steps will be carried out:

- Contracts will be the lead in coordinating HSSE evaluation.
- Contracts will send a prequalification package to possible bidders asking of their interest.
- The package will include the results of the Responsible Contractor HSSE risk assessment of the work to be performed.
- The package will include a request for information based on their HSSE program (Use Attachment 4 or equivalent as outline for the questionnaire).
- Contracts will review the received information for completeness.
- HSSE will evaluate the subcontractor's submitted HSSE data.
- HSSE or the Site Construction Manager may determine that a Qualification Audit should be performed by the HSSE Supervisor (using Attachment 4 as the basis) on any company determined to be questionable.
- Poor field performance will override the results of a subcontractor audit.
- If removed from a Bidders List for a specific subcontract package, the company will remain off the Bidders List until it provides sufficient documentation and assurances to Responsible Contractor to ensure that an acceptable performance will be achieved.

- Potential Subcontractors who successfully complete the prequalification phase are eligible to be included in the invitation to bid listing.

7.3 Selection

The objective of the Selection phase is to choose a Subcontractor most likely to perform the work safely, economically, in a timely manner, and in compliance with environmental requirements.

Contracts will ensure that the Subcontractor's HSSE package is submitted for evaluation as part of each Bidder's response to a specific RFP. HSSE is responsible for the evaluation of the HSSE submittal.

The Subcontractor's HSSE Program must be equal to or more stringent than the requirements contained in the most current version of these procedures that are applicable to the Scope of Work.

As a minimum, if adoption of Responsible Contractor's HSSE Program is used then the Subcontractor's HSSE Program must contain the following elements:

- Company HSSE Policy Statement.
- Names of persons with the authority and responsibility for implementing the program.
- A procedure for ensuring that employees comply with safety and health work practices.
- A procedure for recognizing employees who follow safety and health work practices.
- A procedure for communicating with employees, in a form readily understandable by all affected employees, on matters relating to occupational safety and health, including revisions designed to encourage employees to inform employers of hazards on the project without fear of reprisal.
- A procedure for identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions and work practices.
- A procedure for correcting unsafe or unhealthy conditions, work practices, and work procedures in a timely manner based on the severity of the hazard.
- Procedures for ensuring that any required HSSE training and retraining is provided for subjects such as, but not limited to (as may be applicable).

    - New employees.
    - Employees given new job assignments for which training has not previously be received.
    - Emergency action plan.
    - Lockout/Tagout.
    - Confined space entry.
    - Process safety.
    - Permit requirements.
    - Hazard communication.
    - Supervisor HSSE Training.
    - Equipment. (Forklift, Elevated work platforms, cranes, etc.)

- Procedure for accident/incident investigation.
- Recordkeeping.

    - Injury/Illness Log.
    - Inspections.
    - Training and retraining.
    - Accident investigation.

7.3.1 Job Hazard Analysis (JHA) Submittal

To determine and evaluate the overall sophistication and acceptability of a Bidder's HSSE programs and policies, as well as their specific approach to hazard identification and elimination/control, all bidders shall submit a JHA, as part of their proposal, specific to the scope of the work on which they are bidding.

Bidders shall utilize the Responsible Contractor JHA form and approach, or their own JHA as long as it addresses the minimum requirements.

7.3.2 Pre-Bid Meeting

HSSE, will emphasize to Bidders during the pre-bid meeting that their HSSE Program is part of the bid evaluation. HSSE will inform Bidders of the following:

- Responsible Contractor is dedicated to the concept that all accidents are preventable. This policy applies to every task undertaken. All Subcontractors and their lower-tier subcontractors on every Responsible Contractor project are to take every action necessary in engineering, planning, assigning, and supervising all operations to establish and maintain safe and healthful working conditions. The JHA submitted with the bidder's proposal should demonstrate understanding of these requirements.
- Subcontractors performing higher risk work must have a designated site safety representative.
- Subcontractors and its lower-tier subcontractor employees must attend the new hire orientation and visitors attend visitor orientation.
- Subcontractors are responsible for qualifying their lower-tier subcontractors to Responsible Contractor's HSSE standards and receiving approval from Responsible Contractor before awarding a subcontract.
- Mandatory Personal Protective Equipment (PPE) requirements for the Project.
- Where provided, the Responsible Contractor First Aid Station is for Subcontractors and their lower-tier subcontractor use. All project-related injuries or illness must go through the first aid station.
- Mandatory Safety Meetings, as follows:

    - Weekly safety meeting for supervisors.
    - Weekly tool box safety meeting for all employees.
    - Monthly Contractor safety representative meeting.

- Subcontractors are required to have their safety representative attend a pre-construction safety briefings.
- Bidders could be audited as a condition to the award of any (sub)contract.

7.3.3 Bid Clarification and Evaluation

If HSSE issues need to be clarified, Responsible Contractor HSSE will participate in this effort.
HSSE will perform audits if determined one is required or if requested by the Site Construction Manager, Contracts, or the customer (and/or if Process Safety Management applies). The audit process is:

- Contracts will schedule the audit with the bidder at the bidder's facility.
- HSSE will develop the list of items to be discussed during the audit.
- Contracts will provide the bidder with the list to be reviewed during the audit.
- The audit team will consist of, at a minimum, representatives from Contracts and Responsible Contractor HSSE.
- HSSE will lead the audit.

The audit team:

- Will assess the Bidder's HSSE Programs to determine effectiveness.
- Will review the Bidder's accident history, as well as all pertinent records, such as but not limited to:

    - Training Records.
    - Injury/Illness Records.
    - HSSE Inspection Records.
    - Examples of HSSE 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 HSSE requirements.

- Upon completion of the audit process, the team will validate the Bidder's safety qualification submittal. The audit will determine the Bidder's ability to perform the work efficiently and safely.
- HSSE will document the audit on the Contractor HSSE Program Evaluation Criteria. (Attachment 4).
- The audit team will meet after the audit to discuss the findings with the Construction Site Manager. If the Bidder receives a high enough rating for the audit, the HSSE Supervisor may approve the Bidder's HSSE qualifications as being sufficient.

7.4 Mobilization

The objective of the Mobilization phase is to provide an opportunity for the Subcontractor to become familiar with the location, facility, personnel, and other work information:

- To ensure a clear understanding of Responsible Contractor and Subcontractor's responsibilities in compliance with HSSE requirements.
- To communicate Responsible Contractor's commitment to safe practices.

This will help the Subcontractor to successfully complete the work without an incident.

7.4.1 Pre-Mobilization Meeting

This meeting is coordinated by Contracts. The HSSE Representative, or the designee of the HSSE Representative, will cover the HSSE issues. The Pre-Mobilization Checklist (Attachment 5) is a tool that can be used to ensure all points are covered.

7.5 Performance of Work

The objective of the Performance of Work phase is to verify that the agreed upon HSSE 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:

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

7.6 Demobilization, Final Evaluation and Close-Out

Subcontractors performing high and medium risk work should be closed out with a report, providing feedback to the selection process.

While performance should be tracked on a regular basis throughout the subcontract, the final report is the distillation of the regular monitoring process and the end of contract review. This may take the form of a close-out meeting where all parties are represented.

The format of the close-out report should reflect the agreed Plan and contractual obligations between Responsible Contractor and the Subcontractor(s). The analysis and summary of conclusions should address:

- Quality of the original HSSE Plan and JHA and their relevance to the overall performance, stipulating what was learned and how future contracts should be structured.
- Incorporation of any new hazards identified into the hazard identification and evaluation process for future contracts.
- Analysis of both Responsible Contractor's and the Subcontractor's HSSE performance for mutual improvement.

- Information on the Subcontractor to be added as a reference for the Customer bid list and which may provide advice for improvements in assessing future tenders.

7.7 Feedback

Feedback of the results of the assessments/audits/Inspections, both during work execution and at close-out, to the front end of the Subcontractor management process is critical to continuous improvement.

All data gathered during the execution of the contract should be recorded and made accessible for future reference. A documented record of HSSE Performance should be kept on each Subcontractor.

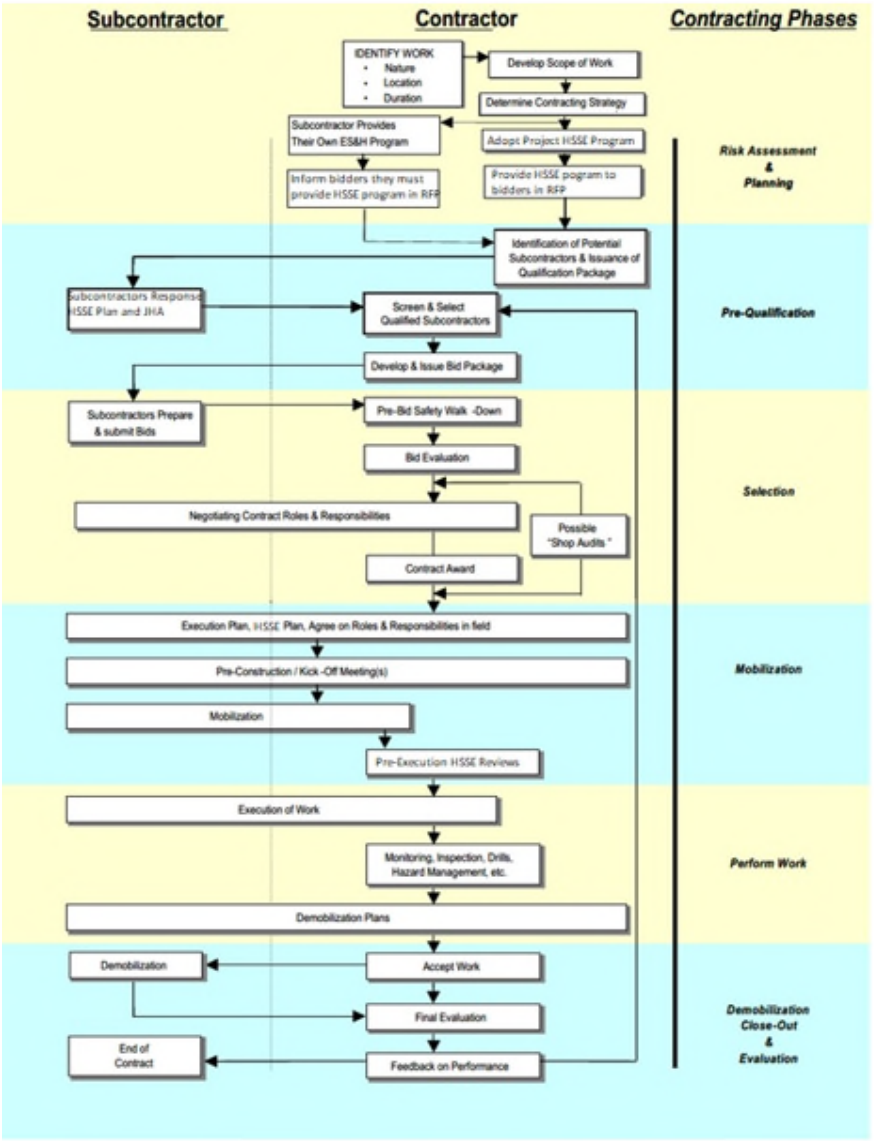
The Subcontractor will again be advised that its overall performance and HSSE record will be considered, when being considered for future work.

This final step is the best way to utilize Responsible Contractor's experience and knowledge in future awards of work.

8.0 ATTACHMENTS

1. Subcontractor Qualification, Selection and Monitoring Process
2. Explanation of Risk Severity
3. EPM-KS0-TP-000002 - Performing a Subcontractor Work Risk Assessment Checklist
4. Subcontractor HSSE Program Evaluation Criteria
5. EPM-KS0-TP-000003 - Sub-contractor Pre-Mobilization Checklist

Attachment 1 - Subcontractor Qualification, Selection and Monitoring Process



Attachment 2 - Explanation of Risk Severity

This exhibit is designed to be an aid in the use of Table 1 and in defining the various levels of consequences. This is not designed as a definitive definition of severities.

SEVERITY RATING	DEFINITION OF CONSEQUENCES							
	People		Environment		HSSE Objectives		Liability & Exposure Potential *	
	Potential Impact	Definition	Potential Impact	Definition	Potential Impact	Definition	Potential Impact	Definition
0	No injury	No injury or damage to health	No Effect	No financial consequences or environmental risk	No Concern	No public awareness	No loss	No damage to equipment and/or materials
1	Slight injury	Not detrimental to individual employability or to performance of work	Slight effect	Negligible financial consequences; local environmental impact within the systems or fence	Slight Impact	Public awareness but no concern	Slight Loss	No disruption to the project minimal cost of repair
2	Minor injury	Detrimental to performance of present work may result in some absence from work	Minor effect	Contamination; damage large enough to harm environment; single exceedance of statutory requirements	Limited Impact	Some local public concern; minor local media coverage	Limited Loss	Brief disruption to the project; isolation of equipment for repairs
3	Major injury	Leading to partial disability or unfitness for work may entail long-term absence from work	Localized effect	Limited loss of discharges of known toxicity; repeated exceedances of statutory requirements	Considerable Impact	Regional public concern. Extensive negative attention in local media or political attention	Considerable Loss	Project partially shut down; can possibly be restarted
4	Single fatality or permanent total disability	Fatality of one individual or permanent disability either short term or long-term (loss of limb, cancer, etc)	Major effect	Severe environmental damage company required to take extensive restorative measures	Major National	National public concern. Extensive negative attention by media and political with potentially restrictive measures	Major Loss	Project shut down for more than a week
5	Multiple fatalities	May include multiple fatalities in close succession due to the incident or exposure to agents in the workplace	Massive effect	Persistent sever environmental damage over a large area-constant high exceedances	Major International	International attention by media with potentially severe impacts on access to new clients.	Catastrophic Loss	Partial loss of project assets with extended down time for the project potential for cancellation

* **LIABILITY AND EXPOSURE POTENTIAL** here refers to equipment, facilities, project timeline, contract penalties, money, capital, other company and contractor and third party property, law suits, fines, compensation for losses, etc.

Attachment 3 - EPM-KS0-TP-000002 - Performing a Subcontractor Work Risk Assessment Checklist

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	

Attachment 4 - Subcontractor HSSE 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 HSSE 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).
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.

CATEGORY	SCORE			
	0	3	7	10
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 HSSE criteria in Annual Review and compensation decisions.

Attachment 5 - EPM-KS0-TP-000003 - Sub-Contractor Pre-Mobilization Checklist

This checklist is to be used by Responsible Contractor employees as a guide to topics to be discussed/resolved prior to a subcontractor mobilization to a Responsible Contractor managed site. The listing is not meant to be exhaustive but as an example format.

Subcontractor/Employer	Date	Responsible Contractor Host

Subcontractor Attendees	Responsible Contractor Attendees

Other Attendees	

Subject	Initial Items Discussed
1. Project ES&H Plan * Purpose * Scope * Issuance of Revisions * Process Safety	
2. Administration and Organization * Administration * Subcontractor Responsibilities	
3. Standards and Regulations * Project Requirements * Federal, State, Other	
4. Training and Education * Employee Orientation * Supervisory Orientation * Subcontractor Employee Orientation * Visitor and Vendor Orientation * Supervisor Meetings * Subcontractor Safety Coordinator Meetings	
5. Subcontractors * Employee Orientation * Notice of Non-compliance * Weekly Injury and Illness Summary * Weekly Safety Performance Summary * Safety Rep: Name: * Hazard Communication Plan * ES&H Plan * First-Aid and Medical * Workers' Compensation * Records and Reporting * Monthly Safety Summary * Monthly Summary - W/Comp. Cases * Accident Reporting and Notification	