

7. Subcontractor HSE management

Purpose: to have systems and processes for subcontractor HSE management. Generally, contractor HSE requirements apply to the on-site subcontractors with exception for material-only suppliers and offsite subcontractors.

Objective:

- to ensure contractor HSE management system is place for safe selection, mobilization and follow up of the subcontractors
- to identify criteria for the HSE qualification of subcontractor
- to provide active and continuous oversight, including routine monitoring of subcontractor HSE performance
- to establish contractor’s HSE responsibility for the subcontractor scope of work
- to ensure the subcontractor HSE performance is in compliance with the contractor and project HSE plan
- to integrate subcontractor’s scope into the contract

Expectations

7.1 Contractor HSE Plan

- The Contractor HSE Plan:
 - identifies and explains in detail the subcontractor HSE management and principle enterprise responsibility
 - includes management of security, health and ethical interfaces with subcontractors
- For project proposals, contractors submit a subcontracting plan, including:
 - Lists of products and services that will be subcontracted
 - Selection criteria to be used to select subcontractors
 - Plans to ensure HSE performance from subcontractors
 - Evidence that the contractor has verified that the subcontractor meets relevant HSE requirements; this step is completed prior to authorizing work to commence
- Relationship and interfaces are constantly managed with subcontractors in order to facilitate continuous HSE improvement. Responsibilities of contractors and subcontractors are clearly identified and delineated.
- Accountability for HSE management is clearly defined between the contractor and their subcontractors for the duration of the contract

This is an extract from IOGP report 597 – Fabrication site construction safety Practices, version 1, published March 2018. IOGP reports are subject to regular review and re-publication. In all cases, only the current version of report 597 is authentic.

- Contracts require subcontractors to comply with the same HSE requirements as the main contractor, relevant to the work performed. Any differences or deviations in the requirements should be identified in the bridging document
- Effective means to communicate HSE issues between contractor and subcontractors are addressed in the Contractor HSE Plan and Communication Plan.

7.2 Prequalification

- Contractor has a process for identification, evaluation, and selection of subcontractors
- Criteria for subcontractor HSE qualification and selection process are part of the Contractor HSE management system
- Contractor assesses the ability of potential subcontractors to meet contract requirements, and only awards the subcontract if satisfied that the subcontractor will meet these requirements
- Contractor shares with the client the subcontractor HSE qualification results and, if requested by the client, any agreed action plan
- Bidder companies are pre-qualified and selected based on their ability to manage the risks associated with the activity to be contracted
- Pre-mobilisation, mobilisation, and demobilisation reviews for subcontractors are organised by Contractor

7.3 Risk management

- Contractor provides to subcontractor in a format and level that is readily understood by subcontractor the following, as a minimum:
 - Site-specific HSE hazards as relevant to subcontractor's scope of work
 - HSE standards as relevant to subcontractor's scope of work
 - Contractor HSE plan
- Contractor partners with subcontractor to provide a safe work environment for the site/project. Contractor revises the risks and the mitigation measures together with the subcontractors during a hazard identification session.
- Contractor maintains an overview of subcontractors, showing activities to be performed and risk level relevant to the work. Contractor provides this overview to the client upon request.

7.4 HSE Training and Competence

- Contractor maintains ultimate responsibility for subcontractor competency assessment, subcontractor HSE training, and equipment/tools provided by subcontractor; level of HSE training is reviewed and agreed
- Contractor verifies that all subcontractor personnel engaged in the work have been informed about the Life Saving Rules and the consequences of not following these
- Contractor ensures subcontractor’s personnel are trained and encouraged to intervene on unsafe behaviours and situations and report on deviations from procedures, plans, and expectations

7.5 HSE supervision and monitoring

- Products and equipment supplied by the subcontractor undergo an acceptance and control procedure by a competent person.
- Contractor has a system to verify that tools / equipment that the subcontractor will use are suitable for the job and safe to use
- The level of on-site HSE supervision by subcontractors is contractually stipulated and corresponds to the risk levels identified and the site HSE requirements
- Subcontractor is integrated to the contractor’s HSE inspection and HSE audit process for the contracted scope
- Subcontractor’s HSE performance standards and reward and recognition scheme are agreed upon and clearly stated in contract documentation
- Contractor evaluates subcontractor’s HSE performance from mobilization to demobilization
- Appropriate corrective actions are taken immediately when non-compliance is detected
- At the end of contract, the subcontractor’s overall HSE performance is assessed and their suitability for consideration for future contracts is determined

Further reading

- IOGP 423 *HSE management guidelines for working together in a contract environment*
 - IOGP 423-01 *Contractor HSE capability assessment and scoring system – Supplement to Report 423*
 - IOGP 423-02 *Contractor HSE capability assessment and scoring system – Supplement to Report 423*
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