



**ITC Construction Group**

## **Trade Contractor Management Program**

**Created: March 2022**

**Revised: March 2024**



**TABLE OF CONTENTS**

**1 Introduction ..... 3**

**2 Definitions..... 3**

**3 ITC Responsibilities..... 4**

**4 Pre-qualification Requirements ..... 5**

**5 Trade Contractor Responsibilities ..... 7**

**6 Enforcement and Discipline ..... 10**

**7 Acknowledgement of Understanding..... 11**

**8 Program Review ..... 12**



## **Trade Contractor Management Program**

*Trade contractors must comply with ITC Construction Group's health, safety, and environmental policies at all times.*

### **1 Introduction**

All Trade Contractors who perform work for ITC Construction Group are required to comply with all Municipal, Provincial and Federal laws, Regulations and Codes. Specifically, this includes the requirements of the Worker's Compensation Act, Occupational Health and Safety Regulations, Codes, Standards, or other legislated requirements which may be in place to govern the health and safety of workers.

The purpose of this program is to ensure that the trade contractors (including their sub-contractors, suppliers, delivery companies and service providers) selected to work on our sites are working in a safe manner and are following our Trade Contractor Management Program requirements.

Trade Contractors are further required to follow the guidelines of the ITC Construction Group's Safety Management System and Programs. Where the Trade Contractor states that they have their own Occupational Health and Safety program and/or safe job procedures in place, copies of those documents must be submitted to ITC Construction Group for review and record retention on SharePoint.

ITC shall ensure all workers on our projects are made aware of our occupational health, safety, and environmental expectations and that they have a safety management system they can follow. Setting expectations is done during the project orientation process. It is maintained by active participation and ongoing monitoring.

Where the Trade Contractor's occupational health and safety program provides a level of protection that is lower than ITC Construction Group's, the most stringent requirements of either program will apply.

### **2 Definitions**

**Owner** is the Owner or the Owner's authorized agent or representative as designated to the Contractor but does not include the Consultant.

**Consultant** is the Architect, the Engineer, or entity licensed to practice in province or territory of the place of the work. The term Consultant means the Consultant or the Consultant's authorized representative.

**Pre-qualification** is a method by which a Contractor is evaluated by ITC. Evaluation criteria includes considerations such as specialized expertise, resources, relevant work experience and references.



**Project Safety Coordinator (PSC)** are ITC representatives that ensure that the construction processes are conducted as per all Municipal, Provincial, Federal laws, Regulations and Codes. They also liaise between the employers and local and national regulatory bodies on the issues related to health and safety in construction.

### **3 ITC Responsibilities**

#### **Corporate Safety Manager**

It is the responsibility of the Corporate Safety Manager (CSM) to ensure:

- The Program is reviewed and conforms to current legislative and regulatory requirements.

#### **Safety Department**

It is the responsibility of the CSM to ensure that the following responsibilities are adequately assigned:

- Issue and collect the completed *Trade Contractor Safety Compliance Agreement*, and the *Trade Contractor Safety Compliance Review Checklist* to trade contractors.
- Provide the completed *Trade Contractor Safety Compliance Agreement and Safety Compliance Review Checklist*, to the CSM or designate for follow up, as needed.
- Provide the CSM or designates approved *Trade Contractor Safety Compliance Agreement and Safety Compliance Review Checklist*, to the assigned Project Manager, the Director of Contract Services, the Safety Manager, and the assigned Project Safety Coordinator (PSC).

#### **Safety Manager**

It is the responsibility of the Safety Manager to ensure:

- The effective administration of the Trade Contractor Management Program at all ITC workplaces.
- The assigned PSCs complete the *Trade Contractor's Safety Compliance Review Checklist* with the Trade Contractors assigned representative.
- That qualified persons evaluate the Trade Contractors safety program effectiveness.

#### **Project Superintendent**

It is the responsibility of the Project Superintendent to ensure:

- That ITC's Trade Contractor Management Program is implemented on all projects under their supervision and that they meet the ITC policy criteria.
- To perform a review of the *Trade Contractor's Safety Compliance Review Checklist* through active participation in their onboarding meetings with the Project Safety Coordinator.



### **Project Safety Coordinator**

It is the responsibility of the Project Safety Coordinator (PSC) to ensure:

- To communicate this program and applicable procedures and information to Trade Contractors.
- To conduct assessments to evaluate the Trade Contractors safety program effectiveness.
- To complete the *Trade Contractor's Safety Compliance Review Checklist* with the Trade Contractors assigned representative.
- To conduct site orientations for Trade Contractors and collect applicable training records.
- The training records are kept on file (i.e., SharePoint) for all Trade Contractor workers.
- Report to the Superintendent any noncompliance or contraventions relating to this program.

## **4 Pre-qualification Requirements**

Pre-qualifications are to be completed on a project-by-project basis; however, they may include several identified projects over an extended period, ideally not to exceed one year. However, where projects are over one year the pre-qualification shall identify the time period on the ITC *Trade Contractor's Safety Compliance Agreement*.

The purpose of this pre-qualification process is to perform a safety compliance review of the Trade Contractor's safety management system and its performance in a way that is collaborative and constructive so that their due diligence duties are met, and a high level of site safety can be achieved.

The safety review is oriented to the work site, the contractor's safety management system and consists of two (2) forms, one more comprehensive than the other. The verification forms are based on applicable requirements from the Worker's Compensation Act, Health and Safety Regulations and Codes.

The required verification forms include:

1. ***Trade Contractor's Safety Compliance Agreement***, to be completed by the Trade Contractor (Owner/most senior designate) in their application for pre-qualification.
2. ***Trade Contractor's Safety Compliance Review Checklist***, sections 1-8 to be completed by the Trade Contractor in their application for pre-qualification.

*Note: The Safety Department will issue and collect the completed, ITC Trade Contractor Safety Compliance Agreement, and the ITC Trade Contractor Safety Compliance Review Checklist.*



Trade Contractor pre-qualification includes the collection of the following documentation:

1. **Trade Contractor's Safety Compliance Agreement**, to be completed by the Trade Contractor (Owner/most senior designate) in their application for qualification. The completed Safety Compliance Agreement is to be submitted along with the following documentation:
  - a. A copy of the Trade Contractors Certificate of Commercial and General Liability Insurance.
  - b. Proof of registration and an up to date (in good standing) "letter of clearance" from the Workers' Compensation Board.
  - c. A copy of their *full* Occupational Health and Safety Program Manual, including safe work practices, safe job procedures, risk assessments, and other relevant documentation.
2. **Trade Contractor's Safety Compliance Review Checklist**, Sections 1-8 are to be completed by the Trade Contractor in their application for pre-qualification. The remaining sections will be completed with ITC's site safety management team prior to site mobilization.
3. **Prior to site mobilization** the Trade Contractor shall also provide the following (as applicable) as identified on their completed *Trade Contractor's Safety Compliance Review Checklist*:
  - i. Their safe job procedures for high-risk tasks as outlined by provincial regulations.
  - ii. Project Specific Risk Assessments.
  - iii. Valid training records for assigned workers to perform their related work tasks.
  - iv. Safety Data Sheets -specific to the products brought on site.
  - v. Exposure Control Plans, and
  - vi. Site Specific Fall Protection Plans.
4. Trade Contractor Owner or most senior designate is to identify on the *Trade Contractor's Safety Compliance Review Checklist* the name of a designated qualified supervisor to be accountable and responsible for their site activities. Additionally, the name of a qualified trade safety representative who will be available in the event the primary contact is unavailable. Both 'qualified persons' must have appropriate supervisor training as defined in the ITC Construction group HSE Program Manual.
5. Lists of equipment, owned by the Trade Contractor that will be brought onto the project i.e., forklift. Equipment is to be maintained in safe operating condition, all contractor equipment brought on site must comply with Provincial Electrical Safety Branch regulations, all electrical equipment must be certified to CSA standards. ITC Construction Group reserves the right to remove or ban faulty and/or unsafe equipment, or equipment not complying with the necessary approval requirements.



## **5 Trade Contractor Responsibilities**

All trade contractors, while working on an ITC Construction Group project must adhere to the following occupational health, safety, and environmental requirements:

1. Plan and execute all work in a manner that complies with applicable legislation, regulations, and the ITC Construction Group's Safety Management System.
2. Have a copy of your current occupational health and safety program on site, (in your lock-up, trailer or truck) and readily available for your employees.
3. Prior to starting any work activities on site, ensure all workers who will be working on, or entering, the worksite have completed a Trade Contractors' Company orientation AND subsequently complete the ITC Construction Group site orientation.
4. Identify all young workers to the PSC, the Trade Contractor is responsible to provide all their new and young workers training as per provincial regulations.
5. Provide interpreter at time of orientation for any worker(s) requiring interpretation and/or translation of the rules and responsibilities addressed in the orientation.
6. Prior to commencing work on our projects, contact the site Project Safety Coordinator (PSC) for special instructions regarding site-specific hazards and applicable instructions for the worksite.
7. Ensure all workers are made aware of site hazards and foreseeable hazards with a site orientation and a review of safe work practices and safe job procedures to perform their work safely. Have a copy of your safe work procedures, specific to the job, readily available on site
8. Ensure all their workers understand and follow safe work practices and safe job procedures.
9. Ensure workers are properly trained in safe job procedures, safe work practices, operation of tools and equipment, etc.
10. Ensure workers are properly supervised to ensure safe work procedures are followed.
11. Explain rules and regulations to their assigned workers and enforce compliance.
12. Provide and enforce the use of adequate, required personal protective equipment (PPE).
13. Only authorized persons shall operate cranes and hoisting equipment brought onto an ITC project. Operators shall inspect the hoisting equipment at the beginning of each shift and shall test limit-switches, brakes, circuit breakers, and other control devices. Any defects that are identified that affect the safe operation of the equipment will require the equipment to be removed from service until the defects are repaired. Documentation required to demonstrate functioning process.
14. Work on or near overhead high voltage lines - All trade contractors involved on work on or near overhead high voltage lines within the distances specified by provincial regulations, shall complete the required forms, and submit copies to ITC PSC, prior to commencing work.
15. Permits - Prior to the commencement of any work, the contractor must obtain and provide all permits required by federal, provincial, or municipal legislation. Examples of such permits include, but are not limited to: electrical inspection, pressure vessel, boiler inspection, etc.
16. Formal Hazard Assessments - Where work requires entry into a confined space the trade contractor shall ensure that all persons engaged in that work activity have received proper



training in procedures and the necessary equipment to perform that work or rescue activity i.e., confined space entry, abatement etc.

17. Provide Trade Contractor Site Specific Hazard Assessments before site arrival and update at a minimum quarterly. To be submitted to the site PSC for review and record keeping.
18. Conduct documented Daily Hazard Assessments with all crew members before working. Provide copies to ITC site assigned PSCs as requested.
19. Conduct documented Daily Workplace Inspections to prevent the development of hazards. Ensure all completed reports have the assigned responsible supervisor's signature and date/time of the review. Copies of all inspection reports and improvement orders written by a regulatory agency in relation to the work being performed shall be forwarded to ITC within three (3) working days (72 hours) of the date of the inspection report.
20. If a contractor encounters any potentially hazardous or toxic substance that may endanger any person... they must immediately inform ITC's assigned PSC and the trade contractor must cease operations until it can be assured that practices for hazardous materials are being complied with.
21. Ensure that workers medical certificates, if required to perform their job, are maintained.
22. Safety Data Sheets for all WHMIS controlled materials that will be on site are provided to the PSC prior to storage or use of the materials on site.
23. Trade contractors are expected to comply with the requirements of the WHMIS legislation. When requested by ITC, any contractor shall provide proof of training of all their workers regarding WHMIS legislation. ITC reserves the right to approach any contract worker and verify, through the asking of standard questions, that the worker understands the WHMIS requirements.
24. Conduct Weekly Safety/Toolbox Talks to ensure unsafe working conditions and practices are adequately addressed. Provide copies to ITC site assigned PSCs as requested.
25. The Trade Contractor is required to attend *Monthly* Trade Site Safety Meetings. The contractor representative(s) shall be qualified and authorized to act on behalf of the Trade Contractor.
26. Immediately correct any unsafe behaviours, practices or conditions reported or observed within their scope of work.
27. All unsafe practices and conditions must be immediately reported to BOTH the ITC Project Superintendent and the assigned Project Safety Coordinator (PSC).
28. All accidents, incidents, and other occurrences i.e., property damage must be immediately reported to BOTH the ITC Project Superintendent and the assigned Project Safety Coordinator (PSC). Trade Contractor to conduct their Investigation(s) without delay. Promptly providing copies of Witness Statements and related Investigation reports to ITC in a timely manner i.e., end of shift.
29. Provide emergency transportation for their workers or make necessary arrangements with the PSC and the ITC Superintendent.
30. Co-operate with other Trade Contractors and workers in promoting safe work practices and maintaining safe conditions throughout the site.
31. Ensure the public is protected from inadvertent harm arising from Trade Contractor activities during their work.
32. The Trade Contractor is responsible for the protection of workers of other Trade Contractors or when working around or above them.





33. Fall Protection / Working at Heights
  - a. Proof of adequate end user training is required
  - b. Fall Protection Plans designed specifically for the project and work to be undertaken by the Trade Contractor.
  - c. Reviewed and acknowledged by all those who will perform the work.
  - d. Adequate dropped object prevention systems available i.e., rated tool tethers.
34. Provide engineering and engineered plans, if applicable for i.e., cranes, scaffolding, swing stages erection, suspended platforms etc.
35. Equipment (work platforms, boom lifts, scissor lifts, forklifts, cranes, etc.)
  - a. Regular daily inspection checklists verifying operational safety requirements are intact and fully functional. Samples should be provided and a binder with all current equipment checklists should be available for review by ITC Construction Group at any time.
  - b. Operator certifications, if applicable, must be readily available always.
36. The Trade Contractor is responsible for securing its tools, equipment, and materials ready for installation against damage, windstorms, loss, theft, and vandalism or similar. Costs or damage due to the Trade Contractor non-securing such will be solely responsible by the Trade Contractor.
37. The trade contractor is responsible to obtain and provide to the ITC project team and Superintendent, all engineered drawings for their structures (as-builts), equipment (includes formwork), as it must be designed, constructed, and used as per manufacturer's instructions (drawings) or the written instructions of a professional engineer (*including updated drawings and/or site drawings, engineer's stamped memos or stamped prior to pour inspections*). Further as required by the Act, Legislation, Regulations and Codes the contractor must ensure that a professional engineer certifies any changes in the work-site specific plans before commencing with tasks. This requirement includes the assurance of all partially assembled structures or components as they must be supported to safely withstand any loads likely to be imposed.

#### **Trade Contractors – Supervisory Staff**

It is the responsibility of the designated, qualified supervisor, foreman, and/or lead hands to ensure:

1. Ensure the health and safety of all workers under their supervision.
2. Be knowledgeable about the regulations pertaining the work being performed by all workers under their supervision.
3. Ensure all workers are made aware of all known or reasonably foreseeable health and safety hazards in the area where they work.
4. That training documentation is kept on site and made available to ITC upon request.
5. That workers have appropriate personal protective equipment (PPE) readily available and used.
6. That the required PPE is regularly inspected and maintained as per manufacturer.
7. That all workers under their authority understand and adhere to the ITC Safety Management System, Health, Safety and Environmental Program, Procedures and Practices.
8. Enforce all safety rules and regulations through active coaching and discipline.
9. Develop and maintain an effective program of good housekeeping and material storage.



10. Conduct documented *Daily* Hazard Assessments.
11. Conduct documented *Daily* Workplace Inspections. Take prompt, corrective action when required to correct any safety or health hazards.
12. Conduct documented *Weekly* meaningful Safety/ Toolbox Talks to workers.
13. Inform the site superintendent of the hours intend to be on site to ensure trade coordination.
14. Complete all required site permits i.e., ITC's Leading-Edge Permit.
15. Promptly investigate and report all accidents and near miss incidents to ITC's site PSC.
16. Ensure that alcohol and drugs are not present or used on the job.
17. Lead by setting a good example.

## **6 Enforcement and Discipline**

ITC Construction Group will not permit workers to act in any way contrary to ITC's best interest or to behave in a manner that causes risk to property, co-workers, or the public.

The Disciplinary Policy provides for progressive action to correct unacceptable behavior. The disciplinary process is designed to support the worker in changing their behavior so that they can continue to be a valued part of our organization.

Unsafe behavior can cause permanent, critical, or fatal injuries to the person behaving in an unsafe manner or to those around them. Unsafe behavior can put the company at risk of heavy financial penalties and legal actions. While committed to fair actions, the seriousness of unsafe behavior can justify strong discipline including termination in many cases. Unsafe performance will not be tolerated, and the full force will be applied when serious disregard for safety is demonstrated.

All site supervisors, workers, inspectors, suppliers, and visitors shall strictly comply with the rules, regulations, procedures, and practices required by all applicable construction safety legislation and programs in place by: Workers' Compensation Board, Building Codes, Municipal Bylaws, and our companies Safety Management System and Health, Safety and Environmental Programs.

*All infractions are required to be documented on the ITC Non-Compliance Record.* Trade Contractor infractions will promptly be provided to the designated/assigned Trade Contractor designated supervisor for review and immediate correction.

A safety violation of a serious nature may result in termination without notice/warning. For example:

- Failure to follow high risk procedures
- Not following safe job procedures after being trained and educated (i.e., working with chemicals and no PPE)
- Repeated non-compliance or a deliberate act of not complying.



- Tampering with safety or fire equipment
- Theft or Vandalism
- Fighting
- Obnoxious or abusive behavior towards others
- Sexual harassment

If there is an infraction the following disciplinary action will be taken:

**ITC Progressive Discipline Process**

**Minor Infraction** Any infraction of government or corporate rules that *does not* have the potential to cause immediate serious damage or injury.

- **1st offense** – ‘Verbal’ written warning (unwanted behaviour correction)
- **2nd offense** – ‘Written’ warning with suspension (24 hrs)
- **3rd offense** – ‘Suspension’ (48 hrs) or ‘Termination’ depending on management review.

**Major Infraction** Any infraction of government, corporate, or client rules or legislation that *has* potential to cause serious damage or injury.

- **1st offense** – ‘Written’ warning *with* ‘Suspension’ (min. 24 hrs) or ‘Termination’.
- **2nd offense** - Termination and immediate supervisor disciplined

**7 Acknowledgement of Understanding**

The ITC Construction Group’s Safety Management System and this Trade Contractor Management Program represents the baseline of safety rules that must be observed by all Contractors and their workers to ensure a safe and healthy work environment.

To make our approach to safety more effective and uniform throughout our organization, we are providing you with access to our ITC Health, Safety and Environmental (HSE) Program and a copy of this

**If you hire a subcontractor to perform your company’s contract work**, the primary Trade Contractor must review the ITC Trade Contractor Management Program with their subcontractor prior to performing work on or for our projects.

*Note: Trade Contractor’s Safety Compliance Agreement and Safety Compliance Review Checklist Forms are required to be completed by solely the primary Trade Contractor.*



Trade Contractor Management Program. *We expect you to read and understand the information herein and to fully comply with the requirements.*

It is expected that all your workers will work in accordance with the Worker's Compensation Act, Occupational Health and Safety Regulations, and Codes, as well as developed site safety rules and the ITC Safety Management System.

The Trade Contractor's Owner or most senior designated representative must review and acknowledge the ITC ***Trade Contractor Safety Compliance Agreement***.

The completed Safety Compliance Agreement along with the required preliminary supporting documentation and the ***Trade Contractor's Safety Compliance Review Checklist*** are to be returned to the ITC Director of Contract Services or designate.

Upon receipt the completed pre-qualification documentation by our Contract Services division the Trade Contractor will be entered into our Safety Management System on our SharePoint server by the ITC Corporate Safety Manager. Once entered into the Safety Management System the Trade Contractor will be assigned to a project. Following this a safety compliance review meeting will be scheduled by the ITC Safety Manager and/or the assigned Project Safety Coordinator(s) prior to the trade contractors site mobilization.

The safety compliance review meeting will be conducted by the Safety Manager or designate, the Project Superintendent or designate, and the assigned Project Safety Coordinator prior to site mobilization. The Trade Contractors designated qualified supervisor and their trade safety representative must be in attendance. In this meeting the ***Trade Contractor's Safety Compliance Review Checklist*** will be completed. Any further items required will be identified at this time.

Trade Contractor site mobilization will be determined upon completion and subsequent submission of required safety documentation.

## **8 Program Review**

ITC Construction Group must monitor the effectiveness of the Trade Contractor Management Program requirements and ensure they are reviewed at least annually.

This review will be led by the ITC Corporate Safety Manager in conjunction with the Joint Health and Safety Committee (JHSC). Active Project Safety Coordinator's will be included for their feedback and summary of trade contractor safety performance and adherence to ITC policies and safety management system. Recommendations for improvement will be noted in the JHSC meeting minutes under recommendations



and action items. Follow up items and completion dates are to be identified in the JHSC minutes. Outstanding items will be forwarded to the Corporate Safety Manger as required for follow up.

## **Forms**

---

- ITC HSE Trade Contractor Safety Compliance Agreement
- ITC HSE Trade Contractor Safety Compliance Review Checklist
  
- ITC HSE TC Project Hazard Assessment Template
- ITC HSE TC Daily Hazard Assessment Template
- ITC HSE TC Daily Workplace Inspection Template

## **Appendices**

---

Appendix – ITC HSE Review Index