

Saint Regis Mohawk Tribe



Safety Policy

Dated: September 2015

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Saint Regis Mohawk Tribe

Safety Policy

The Saint Regis Mohawk Tribal Council believes that our employees are our greatest resource. Their health and safety are paramount to all members of Tribal Council.

The Saint Regis Mohawk Tribe is committed to providing resources, direction and action to ensure that employees work safely. Our aim is to prevent, reduce and eliminate sickness or injury in the workplace. We believe an investment in health and safety will pay dividends in overall employee health and well-being many times over. In support of these goals, we have adopted the following SRMT Safety Policy.

We are committed to:

- Providing a safe and healthy workplace;
- Encouraging a positive safety attitude and environment;
- Identifying hazards, assessing risks and implementing appropriate controls;
- Developing safety standards and regulations;
- Providing employees, contractors and visitors with information, instruction, training and supervision appropriate to the hazards they are likely to encounter;
- Setting safety objectives and targets
- Performing a regular review of the safety policy to ensure it is meeting the needs of the SRMT.

Each employee is personally responsible and accountable for their own safety and health performance. We expect our employees to be role models in safety for our community. By adopting the Safety Policy and associated procedures, we strive to improve key safety indicators and help build a safer tomorrow.

SAINT REGIS MOHAWK TRIBAL COUNCIL

A blue ink signature of Beverly Cook.

Beverly Cook,
Tribal Chief

A blue ink signature of Ron LaFrance Jr.

Ron LaFrance Jr.,
Tribal Chief

A blue ink signature of Eric Thompson.

Eric Thompson,
Tribal Chief

CHAPTER 13: CONSTRUCTION CONTRACTS

13.01 Purpose: Saint Regis Mohawk Tribe has a strong commitment to the health and safety of its employees, visitors and contractors. This section explains the procedures to be followed when evaluating, preparing, and executing construction contracts with outside contractors.

A contractor's work practices and on-site work activities must be done in a safe manner and SRMT will take every opportunity to align itself with contractors that are equally committed to the health and safety of their employees and the work site environment.

13.02 Scope: This Chapter is applicable to Construction Contracts, Contractors, Safety Officer and the identify SRMT Construction Manager of each project.

13.03 Responsibility: Tribal officials who participate in the contracting process for construction are responsible for following these procedures:

1. The SRMT Construction Manager designated for the project will:
 - a. Provide information to contractor on emergency procedures and area hazards in preplanning meetings to discuss safety.
 - b. Conduct onsite inspections of contractor compliance.
 - c. Request assistance when needed from the Tribal Safety Officer to complete investigations of safety violations and subsequent fines or suspension of contract work.
 - d. Notify Safety Officer of safety violations.
2. Contractor's Safety Responsibility:
 - a. Develop a safety plan outlining all safety procedures as it pertains to this project.
 - b. Identify who to contact if the event of a safety concern or violation.
 - c. Ensure that all employees are properly trained and supervised.
 - d. Conduct weekly safety meetings. Maintain records of safety meetings.
 - e. Provide copies of all accident reports to the SRMT Construction Manager.
3. SRMT Safety Officer's responsibility:
 - a. Review safety plans of contractors.
 - b. Conduct inspections.
 - c. Conduct safety orientation sessions with contractor employees.
 - d. Attend safety meetings onsite and review safety meeting minutes.

13.04 Construction Contract Procedures:

1. Contractors are required to have a written Safety Plan and/or procedures. The Contractor shall sign a safety certification (attached) and provide with their bid,

attesting that they have a safety plan in place and that they will abide by that plan and the SRMT Safety policies for the duration of the project.

2. Contractors may submit a Company Profile ahead of time to the Compliance Department. The profile will explain their detailed procedures in safety. This includes details about the Company, Safety procedures, chemicals used, job hazards analysis and trained workers. They should also include safety injury statistics for the previous three years. This Company Profile will be used for frequent contractors and, as needed, will be updated by the contractor and Safety Officer periodically or as the job changes.
3. Contractors will be responsible for ensuring that any subcontractors will meet and follow their safety plan and the SRMT Safety Policies.
4. In the case of major capital projects, the SRMT Safety Officer will provide a safety orientation to all onsite personnel at the start of the project. He/she will review Tribal safety policies relevant to the project. All employees must be identifiable as having attended the orientation, by helmet sticker or other identifier, or will not be allowed on the job site.
5. All safety meetings between the Tribal representatives and the Contractor will review safety issues and procedures to ensure everyone understands the safety expectations and how they will be carried out. This includes reviewing safety incidents, near miss or injury reports. In cases where there is a difference of opinion on a safety standard the SRMT Safety Policy shall take precedence.
6. The Tribal Safety Officer will review the safety performance of all contractors.
7. During these reviews or as called upon by workers at the site, the SRMT Safety Officer will contact the Contractor's Supervisor on site if there are any infractions of the safety plans, such as not wearing fall protection. Any infraction needs to be corrected immediately or the Officer will:
 - a. Instruct the Supervisor to halt all work at the site and the Owner will be contacted immediately. Work will be halted until the situation is resolved to the satisfaction of the Officer or following a meeting of the Contractor and Tribal safety representatives to find an immediate solution.
 - b. Following a work stoppage or other serious safety infraction an incident report will be completed and forwarded to the Tribal Safety Committee and they will determine an appropriate fine to charge the contractor starting at \$500 for the first incident and increasing up to \$5,000.
 - c. Severe or repeated violations of contractor's or SRMT Safety Policy may result in termination of contract.
8. Contractors may submit written complaints or record of disagreement with any determinations made in number 7, above.

9. At the final review meeting of the project the SRMT representatives and the Contractor will evaluate their collective performance in safety and make recommendations for improvement in the future.

13.05 Sample Company Profile

In order to facilitate SRMT's assessment of contractor's commitment to sound health and safety management, a company profile may be provided, which contains the following information:

Element	Relevant Information & Documentation
General Information	<ul style="list-style-type: none"> • Current company name • Number of years that the company has operated under this name • Current street and mailing address • Current Phone Number • Current Fax Number • Current Emails • If applicable , previous company name • If applicable # of years that your company operated under this name • If applicable, previous street and mailing address
Safety Policy	<ul style="list-style-type: none"> • Provide a copy of your company's Safety Policy
Worker Compensation and Commercial General Liability Insurance	<ul style="list-style-type: none"> • Provide Workers Compensation information • If applicable, provide documentation of professional liability insurance (including dollar value)
Health and Safety Programs, Procedures, Guidelines etc.	<p>For those subject areas that are listed below and that are applicable to this particular project, please submit copies of any relevant programs, procedures, guidelines, etc. that your company has developed and/or uses</p> <ul style="list-style-type: none"> • Accountability mechanism (e.g. incentive programs, progressive discipline, etc.) • Compressed air • Confined space entry • Cranes and other lifting devices • Designated substances specific programs • Emergency Procedures and Response Plan • Excavating and Trenching • Fall/arrest/ restraint system, including use of ladders and scaffolding • Fire Safety

	<ul style="list-style-type: none"> • First Aid Plan • Hearing Protection • Heavy Equipment maintenance • Lock out Tag Out • Methods of evaluating subcontractors • Personal Protective equipment • Preventative maintenance • Public way protection and traffic control • Respiratory protection • Spill control and prevention • Waste disposal and storage • Weekly Safety Meetings and inspections • Workplace Hazardous Materials Information • Any other relevant documentation
Joint Safety committees/ Health and Safety Representatives	<ul style="list-style-type: none"> • List the name of your Health and Safety Representative or names of your Joint Safety committee members and if possible provide minutes from your previous meeting from another project.
Hazardous Materials	<ul style="list-style-type: none"> • Provide a list of all hazardous materials that are either proposed for use or that will be used on site during the project and • For the materials identified, please provide a copy of its MSDS (electronic copies are acceptable) • Provide a plan for disposal if applicable.
Job Hazard Analysis as it pertains to safety	<ul style="list-style-type: none"> • Describe each phase of the project; • Describe the specific task that must be performed to complete each task; • Describe the specific activities that must be performed to complete each task; • For each activity identified, list the physical, chemical and/or biological hazards that may adversely affect the health and safety of the contractor/public and or SRMT employees; • For each hazard identified, list the corresponding engineering control, administrative controls, work practices and/or personal protective equipment that will be used to mitigate/control these hazards and satisfy the SRMT requirement(s).
Safety Training As it pertains to job task and Hazards of project.	<ul style="list-style-type: none"> • Training requirements that your employees will have in order for them to minimize any risks on the environment and their own health and safety during this project. • For each training requirement identified , name the training course that you will use or have used to

	<p>satisfy that requirement and describe the content of the course;</p> <ul style="list-style-type: none"> • Provide photocopies of training records showing participants names and training dates; and • Provide lists of employees fully trained and authorized to operate each piece of equipment you will be using on the site
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1. Construction Manager designated for the project will:

- a. Provide information to contractor on emergency procedures and area hazards in preplanning meetings to discuss safety.
- b. Conduct onsite inspections of contractor Safety Officer or Construction Manager.
- c. Conduct brief safety orientation sessions with employees Contractors may submit a Company Profile ahead of time to the Compliance Office. The Profile will explain their detailed procedures in Safety.

Element	Relevant Information & Documentation
At the final inspection of Health and Safety Policy	<ul style="list-style-type: none"> • Provide a copy of your company's health and safety policy
Worker Compensation and Liability Insurance	<ul style="list-style-type: none"> • Provide Workers Compensation information • If applicable, provide documentation of professional liability insurance (including dollar value)
Joint Safety committees/ Health and Safety Representatives	<ul style="list-style-type: none"> • List the name of your onsite Health and Safety Representative
Hazardous Materials	<ul style="list-style-type: none"> • If different from the Environmental Assessment
Safety Training As it pertains to job task and Hazards of project.	<ul style="list-style-type: none"> • Contractor certifying all this info by signing Safety Certification with bid.

Contractor Safety Certification Form

As owner of the company, _____,

I certify that we have a Safety Policy or Plan which explains our safety procedures and practices. Our employees and any subcontractors will follow these procedures to the completion of the project or face disciplinary actions by the SRMT. This plan meets the minimum standards established by SRMT Safety Plan and Procedures to ensure their employees are properly trained to operate equipment and handle hazardous materials to be used on site.

Project: _____

Owner: _____

Date: _____