

# Contingent Staff EHS Management N-ID-OSA 034

<b>Responsible for Document</b>	SVP Environment, Health, and Safety
<b>Scope</b>	North America
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<b>Superior Document</b>	<a href="#">N-R-OSA 002</a>

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## 1 Reference to Superior Document

N-R-OSA 002: *Contractor Safety*

## 2 Purpose

The purpose of this document is to establish minimum environmental, health, and safety (EHS) requirements for BASF contingent staff employees as part of the BASF global EHS Responsible Care® Management System (RCMS®).

## 3 Definitions

### **contingent staff employees**

Contingent staff are individual, non-BASF employee workers for whom BASF provides direct supervision in their day-to-day activities and direction to how an activity is to be performed. Contingent staff are often referred to as “contract” or “leased” employees.

### **Contracted Services portal**

The Contracted Services portal is a public access site where BASF, contractors, MSPs, temporary staffing agencies, and contingent staff can reference relevant EHS plans, documents, standards, policies, and best practices via the Internet. The site address is: [contracted-services.basf.us](http://contracted-services.basf.us).

### **contractor**

a company that will be either placing or bringing contractor(s), subcontractors, contingent staff, or contractor employee(s) onto a BASF site

### **contractor employee**

A contractor employee is an individual engaged by or through a third party to perform services principally for the third party and whose day-to-day activities are directed by the contractor, not BASF.

### **hiring manager**

the BASF employee responsible for the contingent staff employee

### **learning management system (LMS)**

the computer-based training (CBT) system for the North American region that contains e-learning courses on a variety of EHS topics, security topics, and IT courses for BASF employees and contingent staff

### **managed service provider (MSP)**

An MSP is a third-party company that facilitates selection, on-boarding, oversight, and off-boarding processes for BASF contingent staff.

### **non-safety-sensitive position**

positions that do not introduce an elevated risk of injury in the workplace from the worker’s tasks; examples include:

- office workers (i.e., administrative professionals, accounting support, IT, designers, engineers, project managers, etc.)
- other positions in which work is not completed in production areas or other high-hazard areas
- low-hazard lab operations (site EHS review required)
- positions that do not require medical clearances such as respirator fit testing, audiometric testing, etc.

### **physical demands assessment**

Process used to identify the physical demands in the workplace and determine and document the physical requirements of tasks associated with each job to:

- Provide a management system to recognize risk factors for musculoskeletal disorders (MSD).
- Identify ergonomic intervention solutions to reduce employee exposure to those risk factors.
- Communicate physical requirements to Human Resources for incorporation into job descriptions for each PMU job classification.
- Be able to communicate physical job demands information as part of the essential functions of the job to an employee's personal physician in the short-term disability process or the site physician in the job placement or return to work processes.

### **safety-sensitive person**

for this definition, any position that does not fit the "non-safety-sensitive position" definition

### **site tour**

For this procedure, a "site tour" would be a general review of the site where the contingent staff would be working, including a specific emphasis on and discussion of the actual work area for the position candidate.

### **temporary staffing agency**

a company which, directly or indirectly (through the managed service provider (MSP)), supplies contingent staff employees to BASF

## **4 Procedure**

### **4.1 General Requirements**

#### **4.1.1 Program Management**

- A. All contingent staff employees working at BASF locations must meet the minimum EHS qualification criteria outlined in this procedure for work at BASF.
- B. It is recommended that all BASF sites use the managed service provider (MSP) when using contingent staff employees. The MSP provides value by:
  - properly vetting all temporary staffing agencies for compliance to BASF EHS requirements
  - assembling candidate pools through resume and application screening
  - ensuring that contingent staff employee candidates are technically qualified for the job
  - facilitating pre-hire requirements such as drug screens, background checks, and relevant pre-job safety training
  - properly orienting the worker to BASF expectations prior to placement
  - overseeing medical case management in the event of an injury incident
- C. The EHS approval process for a contractor that provides only contractor employees (not contingent staff employees) per the definitions Section 2 is outlined in [N-ID-OSA 002: Contractor EHS Management](#). If the contractor provides both contingent staff employees and contractor employees, the contractor is required to be in compliance with both N-ID-OSA 002 and this

document. These documents, as well as other relevant BASF procedures, are available via the [Intranet](#).

- D. A structured dialog shall be established between the BASF site and the MSP or between the BASF site and all temporary staffing agencies (if the BASF MSP is not being used) with the goal of exchanging relevant safety information, discussing initiatives to reinforce the safety awareness, and preventing injuries/illnesses, as well as a general agreement around communication, safety procedures, etc.

#### 4.1.2 Written Program

As part of *Contingent Staff EHS Management*, each BASF site shall have a written program. The program will include but not be limited to:

- defined job requirements
- any identified medical clearances needed
- a pre-screening process of all temporary staffing agencies (if the MSP is not used)
- interviewing process for all contingent staff employees
- means to provide the required personal protective equipment (PPE) per [N-ID-OSA 007: Personal Protective Equipment](#)
- orientation process for all contingent staff employees
- EHS and job-specific training and qualifications

Use this corporate procedure outline to organize all requirements of this written program section.

If the site uses the BASF MSP for all contingent staff employees, a BASF contingent staff EHS management written program is not required.

## 4.2 Pre-Access

### 4.2.1 Defined Job Requirements

Each contingent staff employee position shall have a documented job description with the following identified:

- all skillsets needed to complete the work safely
- a physical demands assessment
- all required medical clearances, if any
- defined job risk (safety-sensitive or non-safety-sensitive, per Section 2 of this document)
- LMS course track identified (See [EHS Curriculum Assignment Process](#) for more information.)

\*See Section 5.3: Attachments, [Attachment 1](#) for example.

### 4.2.2 Candidate Selection and Training

1. Each position a contingent staff employee is to fill shall be properly screened against the documented job description to ensure that only qualified candidates make it to the interview process.
2. The hiring manager is responsible for making sure that the MSP or the temporary staffing agency has a good job description for the position to be recruited.
3. The MSP or the temporary staffing agency should be provided with a list of questions used to screen for:

- motivational fit
- safety awareness
- analytical aptitude
- entrepreneurial drive
- ability to work on a team

These answers should be given to the hiring manager prior to interviews.

4. Candidates meeting the job descriptions outlined in [BC004.018: Pre-Employment Testing](#) shall also complete the BASF Pre-Employment Testing in accordance with BC004.018. This testing is part of the selection and screening process, and it is recommended that any potential candidate who does not achieve a DDI testing grade of a “B” or higher should not be considered for an interview.

#### **4.2.3 Hiring Manager and Interview Process**

For safety-sensitive positions, the hiring manager or designee shall complete a face-to-face interview beginning with a site tour giving the candidate an idea of the work environment and the physical demands required. The candidate can choose to not participate in the interview if he/she is uncomfortable with the work environment. This removes him/her from the process.

For non-safety-sensitive positions, the hiring manager or designee may or may not complete a site tour as part of the interview process.

#### **4.2.4 Post-Offer / Pre-Access Requirements**

##### **A. Background Checks**

All contingent staff employees shall complete background checks prior to working on a BASF site in accordance with [BC004.043: Background Checks – Contract and Temporary Workers](#).

Include the following items, as a minimum in a background check for each contingent staff employee who is anticipated to work on a BASF site:

- employment history (last two (2) years)
- Social Security number verification
- state criminal record (states of residence and employment last seven (7) years)
- federal criminal record for last seven (7) years as shown by previous residence and employment
- current and prior address check as verified by Social Security number
- credit check (at BASF’s option)

Perform the following checks only for those situations in which it is necessary for the work to which the contingent staff employee is assigned:

- FDA debarment
- motor vehicle driving record
- DEA (Drug Enforcement Administration)

##### **B. Drug Screens**

Complete drug screens for all US contingent staff employees and in accordance with [N-R-OCH 002: Alcohol and Substance Abuse Requirement for U.S. Sites](#).

### C. Pre-Employment / Pre-Access Training

For positions that are classified as safety-sensitive positions per the definition in this document, basic industry curriculum EHS training is required prior to the BASF contingent staff employee beginning work at the site. This basic EHS training curriculum can be taken at an established safety council, via web-based platform, or by leverage of the below training equivalents:

- Association of Reciprocal Safety Councils (ARSC) – Basic Plus Orientation
- ISTC Web General Safety Orientation (GSO)
- National Center for Construction Education and Research (NCCER) - Safety Orientation
- OSHA 10-hour Outreach Training
- Canada – Orientation on Health and Safety for New Workers

#### 4.2.5 BASF Orientation

This high-level orientation is designed to give the new contingent staff employee:

- an overview of BASF
- his/her working relationship with the company
- who his/her actual employer is
- to whom and how he/she reports injuries

Cover this orientation with the contingent staff employee on the first day of his/her assignment.

If the site uses the BASF MSP for all contingent staff employees, the MSP will be responsible for delivering this orientation.

#### 4.2.6 BASF Site and Unit Level EHS Orientation

Site- and unit-level EHS orientation of contingent staff employees shall be equivalent to the minimum requirements for newly-hired BASF employees who perform similar work activities. The contingent staff employee's supervisor must ensure that the orientation is conducted in a timely manner and includes at a minimum:

- site and unit emergency and evacuation procedures including
  - reporting emergencies
  - exit and fire extinguisher locations
  - required response actions, including for spills/releases
  - evacuation assembly points
- site and unit safety rules
- accident/incident reporting procedures
- access to first aid and medical facilities
- site security, access control, and escort policies
- access to site/building and after-hours work/working alone
- location of, access to, and use of personal protective equipment (PPE)
- location of, access to, and use of site and unit EHS procedures including PPE requirements, JSAs, and Safety SOPs

- location of and access to safety data sheets (SDSs)
- participation in site/unit safety meetings, training and safety programs (i.e., ERP)
- explanation of building layout and site or unit tour
- cafeteria and/or eating areas
- smoking areas (if applicable) and site smoking policy
- overview of required computer-based training assignments and job-specific training – and verifying he/she has LMS access

#### **4.2.7 Learning Management System (LMS) Course Training**

Personnel with administrator rights will assign the designated course training per the defined job requirements.

#### **4.2.8 Job-Specific Training**

The contingent staff employee supervisor is responsible for ensuring that all relevant, job-specific training is covered. Examples of this training may include:

- applicable standard operating procedures or SOPs
- job safety analysis
- fork truck safe operation
- overhead crane safe operation
- permit issuance and acceptance

*\*Refer to [Attachment 3](#) in Section 5.3: Attachments, for the contingent staff EHS process flowchart for quick reference.*

### **4.3 Work Execution**

#### **4.3.1 Incident Reporting and Investigations**

All incidents involving contingent staff employees must be reported in compliance with [N-ID-OSA 010: Incident Notification and Reporting](#).

Where contingent staff employees are involved in an incident, the contingent Staff employee's employer or the MSP (if applicable) must be notified as soon as reasonable, so adequate incident or case management practices can be followed.

### **4.4 Monitoring, Evaluation, and Feedback**

#### **4.4.1 Incident Recordkeeping**

Each BASF site must maintain a log of recordable injuries and illnesses for BASF and contingent staff employees. The log may be subdivided to show separate listings for contingent staff employees, but the log must be considered as one log for compliance purposes, i.e., annual posting of the log.

In addition to adhering to the BASF incident recordkeeping and reporting requirements defined in N-ID-OSA 010, each US location shall ensure that [N-ID-OCH 031: Medical Case Management – US Sites](#), includes procedures for handling contingent staff employees affected by a workplace injury or illness to ensure that they receive prompt, effective medical treatment.

Each site shall also ensure that all temporary staffing agencies or the MSP (if applicable) address medical clearance, medical surveillance, return to work,



and other fitness-for-duty assessments performed by the site’s medical function or outside medical provider in accordance with BASF corporate medical procedures.

**4.4.2 BASF Contingent Staff EHS Management System Review / Safety Performance Evaluation**

Each site shall review the effectiveness of practices at least every three (3) years to ensure that the contingent staff EHS management system is properly implemented and that the elements adequately support contingent staff EHS performance improvement. At a minimum, include the following elements of the contingent staff EHS management system in the review:

- the site procedure to ensure that written requirements agree with this document
- the participation of affected stakeholders (Procurement, Engineering, Maintenance, Operations, EHS, etc.) in the development and/or revision of site procedure
- an adequate understanding of contingent staff management roles and responsibilities among affected stakeholders (Procurement, Engineering, Maintenance, Operations, EHS, etc.)
- documented unit/site EHS orientation completed before work begins
- completion of assigned EHS training per EHS curriculum assignment process and job-specific training per unit requirements
- contingent staff employees’ hours accounting and reconciliation process

**4.4.3 Contingent Staff Hours Accounting**

All BASF sites shall submit cumulative monthly hours at the North America level each month.

The MSP and all temporary staffing agencies shall submit hours to the BASF sites where they completed work each month. Each site shall have a means to reasonably reconcile these hours on a periodic basis. Some of these means to reconcile can be:

1. invoicing data
2. sign-in and -out logs with site security
3. scan-in and -out systems (electronic badging programs)

**5 Supplement**

**5.1 Revision History**

Revision	Section	Short Description of Changes
0	all	new release

**5.2 References**

Document Number	Document Title
<a href="#">BC004.018</a>	<i>Pre-Employment Testing</i>
<a href="#">BC004.043</a>	<i>Background Checks – Contract and Temporary Workers</i>
<a href="#">N-R-OCH 002</a>	<i>Alcohol and Substance Abuse Requirement for U.S. Sites</i>

N-ID-OCH 031	<i>Medical Case Management – US Sites</i>
N-ID-OSA 002	<i>Contractor EHS Management</i>
N-ID-OSA 007	<i>Personal Protective Equipment</i>
N-ID-OSA 010	<i>Incident Notification and Reporting</i>
N-R-OSA 002	<i>Contractor Safety</i>

### 5.3 Attachments

<a href="#">Attachment 1</a>	Job Description Tracker
<a href="#">Attachment 2</a>	Basic Plus and GSO Training Curriculum Outline
<a href="#">Attachment 3</a>	Process Flowchart

### 5.4 Abbreviations

<b>ARSC</b>	<b>A</b> ssociation of <b>R</b> eciprocal <b>S</b> afety <b>C</b> ouncils
<b>BC</b>	<b>B</b> ASF <b>C</b> orporation
<b>CBT</b>	<b>c</b> omputer- <b>b</b> ased <b>t</b> raining
<b>DDI</b>	<b>D</b> evelopment <b>D</b> imensions <b>I</b> nternational
<b>DEA</b>	<b>D</b> rug <b>E</b> nforcement <b>A</b> gency
<b>EHS</b>	<b>E</b> nvironment, <b>H</b> ealth, <b>S</b> afety
<b>ERP</b>	<b>e</b> xposure <b>r</b> eduction <b>p</b> rocess
<b>FDA</b>	<b>F</b> ood and <b>D</b> rug <b>A</b> dministration
<b>GSO</b>	<b>g</b> eneral <b>s</b> afety <b>o</b> rientation
<b>ISTC</b>	<b>I</b> nternational <b>S</b> afety <b>T</b> raining <b>C</b> ouncil
<b>JSA</b>	<b>j</b> ob <b>s</b> afety <b>a</b> nalysis
<b>LMS</b>	<b>l</b> earning <b>m</b> anagement <b>s</b> ystem
<b>MSD</b>	<b>m</b> usculoskeletal <b>d</b> isorders
<b>MSP</b>	<b>m</b> anaged <b>s</b> ervice <b>p</b> rovider
<b>NCCER</b>	<b>N</b> ational <b>C</b> enter for <b>C</b> onstruction <b>E</b> ducation and <b>R</b> esearch
<b>OSHA</b>	<b>O</b> ccupational <b>S</b> afety and <b>H</b> ealth <b>A</b> dministration
<b>PMU</b>	<b>p</b> roject <b>m</b> anagement <b>u</b> nit
<b>PPE</b>	<b>p</b> ersonal <b>p</b> rotective <b>e</b> quipment
<b>RCMS®</b>	<b>R</b> esponsible <b>C</b> are® <b>M</b> anagement <b>S</b> ystem
<b>SDS</b>	<b>s</b> afety <b>d</b> ata <b>s</b> heet
<b>SOP</b>	<b>s</b> tandard <b>o</b> perating <b>p</b> rocedure