



**STANFORD  
UNIVERSITY**

**ENVIRONMENTAL HEALTH AND SAFETY DEPARTMENT**  
ENVIRONMENTAL SAFETY FACILITY  
480 Oak Road  
Stanford, CA 94305-8007  
(650) 723-0448 FAX: (650) 725-3468

---

January 24, 1993

TO: Project Managers, University Safety Partners

FROM: Larry Gibbs, Associate Vice President - EH&S  
Larry Wolfson, Manager of Contracts - Procurement

RE: Stanford's Safety Information Responsibility to Contractors

Stanford's responsibilities to contractors in terms of compliance with the Injury and Illness Prevention Program (IIPP) requirements are set forth in Labor Code 6401.7 and Title 8 California Code of Regulations Section 3203. Briefly, the IIPP requires all employers to identify, evaluate, inspect, correct, maintain records, and train employees regarding hazards encountered in their work environment.

Environmental Health and Safety and Procurement personnel, in consultation with General Counsel Office representatives, have recently reviewed this issue and determined the following:

If a worker or contractor is functioning like an employee (i.e., taking specific day to day direction from Stanford staff or faculty, such as a temporary clerical worker), she/he is required to receive training and information (and records of that training maintained) as would any other employee. This determination is concurrent with Labor Code Section 6401.7(h) which reads:

*The employer's injury prevention program, as required by this section, shall cover all of the employer's employees and all other workers who the employer controls or directs and directly supervises on the job to the extent these workers are exposed to worksite and job assignment specific hazards. Nothing in this subdivision shall affect the obligations of a contractor or other employer which controls or directs and directly supervises its own employees on the job.*

If a contractor directs his/her own workers to complete a particular project (e.g., erecting scaffolding for a construction site, painting a building, etc.), Stanford **does not have** IIPP responsibilities to that contractor. **Stanford is, however, responsible for disclosing site specific hazards to the contractor.** Site-specific hazards may include the presence of chemical, radiological or biological materials; specialized equipment such as radiation producing devices; etc. Disclosure of any site-specific hazards should occur prior to the solicitation process so any precautions to address the identified hazards can be taken into account by the contract company.

Consult pages 3-2, 3-3, and 4-34 through 4-37 in the Stanford Safety Manual for appropriate employee training guidelines. Larry Wolfson, at 723-9406, may be contacted regarding questions about disclosing potential hazards in the bidding process. Other questions about IIPP responsibilities may be directed to Peter Burnes at 723-0593 at EH&S.

cc: Kemel Dawkins