Contractors, Temps, and the Gig Safety Gap

Contractors, temporary workers, staffing-agency employees, subcontractors, delivery partners, and platform workers may sit outside your payroll. Once they enter your workplace, however, they can be exposed to your hazards, create hazards for your employees, and become part of your operational risk.

> The question isn't simply "Who employs this person?" The more useful safety question is "Who knows the hazards, who controls the work, and who has verified that this person is prepared for what happens next?"

The worker is temporary. The consequences may not be.

A contractor arrives for a two-day maintenance job. A staffing agency sends six workers to cover a production surge. A courier enters a busy yard. A subcontractor brings in a crew that was not on yesterday's list. A platform worker is asked to pick up material from a loading area they have never seen before.

Each person may have a different legal relationship with the organization. Some may be employees of another company. Some may be jointly supervised. Some may be independent businesses. Some may operate through a digital platform. Those distinctions matter legally, and employers should not treat them as interchangeable.

Operationally, however, they can share one dangerous characteristic: they are doing work in or around an environment they don't know as well as the people who work there every day.

That unfamiliarity is where the borrowed workforce problem begins.

OSHA has repeatedly warned that temporary workers can be especially vulnerable when responsibility is split between a staffing agency and a host employer. Its current guidance says both parties have roles, and that host employers are often best positioned to provide training tailored to the actual workplace, equipment, and hazards. In British Columbia, WorkSafeBC takes a similarly coordinated approach at multiple-employer worksites. A prime contractor coordinates site-wide safety, while individual employers still retain responsibility for their own workers.

The practical lesson for safety managers is straightforward. Employment status does not organize the hazard for you. Someone still has to make sure the worker receives the right information, instruction, training, supervision, and verification before exposure begins.

Relevant guidance: OSHA Protecting Temporary Workers and WorkSafeBC Roles, Rights & Responsibilities

The biggest risk is often the ownership gap

Contractor and temporary-worker failures rarely start with a complete absence of safety activity. More often, several people each do part of the job and assume someone else completed the rest.

The staffing agency believes the host will handle the site-specific hazards. The host believes the staffing agency confirmed the worker's basic qualifications. Procurement believes the contractor was prequalified. The project manager believes the supervisor completed orientation. The supervisor sees a signed form and assumes the worker understands the rules.

Everyone has evidence that something happened. Nobody has a clean view of the whole training picture.

That's the ownership gap.

- Who confirms the worker has the basic competence required for the task?
- Who explains the hazards unique to this site?
- Who covers emergency procedures, traffic routes, restricted areas, reporting channels, and stop-work expectations?
- Who verifies equipment-specific or task-specific capability?
- Who tells the worker what changed since the last shift or site visit?
- Who coordinates overlapping work between contractors and employees?
- Who decides when a change in scope requires new training or a new briefing?

If the answer to any of those questions is "we assumed the other party did it," the organization has found a real control weakness.

Why borrowed workers deserve deliberate attention

Temporary work creates a structural challenge that permanent employees don't face as often. A temporary worker can become a "new worker" repeatedly as they move between clients, departments, equipment, crews, and operating systems. OSHA's Temporary Worker Initiative specifically notes that temporary workers may be new to a job multiple times in a year and has investigated serious and fatal incidents occurring in workers' first days on an assignment.

Canadian research has described the same problem from another angle. The Institute for Work & Health found that the three-way relationship among temporary agencies, client employers, and workers can create uncertainty about responsibility for on-site hazard assessment and training. The study also identified unfamiliarity with equipment and processes and mismatches between a worker's ability and the assigned job as recurring concerns.

The evidence on every category of non-standard employment isn't identical, and the term "gig worker" covers very different arrangements. Safety managers should therefore avoid making sweeping claims that every contractor, temp, or platform worker has the same injury risk. The useful conclusion is narrower and stronger: unfamiliarity, fragmented responsibility, changing assignments, and weak coordination are recognizable risk factors that can be managed.

Research reference: Institute for Work & Health report on temporary work agencies

Three layers of training must connect

One reason contractor programs become bloated is that organizations treat every safety requirement as the same kind of training. A cleaner model separates what is portable from what belongs to the site and what exists only at the interface between work groups.

Layer	Primary question	Typical content	Likely owner
1 Portable competence	Can this person perform this type of work?	Trade qualifications, general hazard education, equipment credentials, general PPE, industry knowledge.	Worker’s employer, staffing agency, contractor
2 Site knowledge	Can this person work safely here?	Emergency response, traffic, restricted areas, site hazards, reporting, local procedures, site contacts.	Host, owner, prime contractor, site operator
3 Task interface	Can this work be performed safely alongside everyone else?	Simultaneous operations, energy states, permits, handoffs, sequencing, affected employees, change coordination.	Shared, with a clearly named coordinator

The third layer is where otherwise competent contractors can still get into trouble. A roofer may know fall protection. That does not mean the people working below are protected from falling objects. An electrician may be highly qualified. That does not mean maintenance knows an isolation state has changed. A delivery driver may have years of commercial-driving experience. That does not mean they understand the blind corner, pedestrian path, or backing rule at your facility.

A worker can be competent at the job and the interface can still be unsafe.

Use HOST to close the training interface

Safety managers need a simple way to test whether the borrowed workforce system is complete. HOST focuses attention on the four places where responsibility most often breaks down.

H: Hazards they will actually encounter

Start with exposure, not employment category. What can hurt this person during this assignment? What can their work expose other people to? The answer should reflect the actual shift, location, equipment, materials, energy sources, traffic, weather, customers, patients, and overlapping work.

O: Ownership of every training obligation

Write down who owns general training, site orientation, task instruction, PPE,

equipment qualification, emergency procedures, reporting, supervision, refresher training, and change briefings. A contract can clarify responsibilities, but a written allocation does not make a missing control safe. OSHA explicitly recommends that hosts and staffing agencies define responsibilities and communicate so necessary protections are not lost between them.

S: Site and task verification

Credentials answer one question. Verification answers another. A certificate may show prior training, but it does not establish that the worker understands your process, your equipment, your local hazards, or today's conditions. For higher-risk work, confirm capability through questions, demonstrations, permits, observations, or other methods proportionate to the hazard.

T: Transitions and changes

Borrowed-workforce risk often spikes when something changes. New crew. New shift. New equipment. Expanded scope. Different weather. New subcontractor. Shutdown. Startup. Emergency work. A contractor who was properly oriented last month may still need new information today.

Five assumptions that create expensive gaps

"They're experienced." Experienced where, on which equipment, under which procedures, and with which hazards? Experience is useful evidence, but it isn't a substitute for matching competence to the actual assignment.

"Their company trained them." Perhaps. The safety manager still needs to know what the training covered and where the host-specific responsibilities begin. OSHA's training guidance for temporary workers specifically distinguishes generic safety training from workplace-specific training.

"They're only here for one day." Short duration does not mean low exposure. It often means less familiarity. A worker can be seriously injured in the first hour of an assignment.

"They signed the orientation." A signature proves the organization captured an acknowledgement. It does not prove the worker recognized the critical hazards, understood the stop-work threshold, or can apply the instructions.

"Their supervisor is responsible." Maybe for some aspects. But if your organization controls the site, creates the hazard, schedules interacting work, or changes the operating conditions, you may still control information that the contractor's supervisor can't provide.

Make the training proportional to the interface risk

Not every outside worker needs a 45-minute LMS course. Overtraining low-exposure visitors wastes time and encourages people to tune out. Undertraining high-exposure contractors creates the opposite problem. A risk-tiered model keeps the system proportionate.

Exposure level	Example	Minimum response	Typical verification
Minimal	Courier or visitor enters reception.	Access rules and emergency instructions.	Brief acknowledgement or escort.
Controlled	Vendor enters production while escorted.	Short site briefing plus escort controls.	Escort confirms boundaries and restrictions.
Operational	Contractor performs routine work.	Site, task, and interface training.	Knowledge check, permit, supervisor verification.
High risk	Shutdown, energized work, confined space, heavy construction.	Formal coordination, qualifications, permits, task controls, change briefings.	Demonstration, field verification, documented authorization.

You don’t need to employ the injured person for the incident to become your loss

Legal liability, workers’ compensation responsibility, and insurance coverage can vary by jurisdiction and relationship. Operational loss is less selective.

A contractor incident can stop production, trigger an investigation, damage equipment, delay a project, force replacement labour, interrupt customer commitments, consume supervisor time, create rework, draw regulator attention, and affect the employees working around the event. Those costs can reach the host even when another organization ultimately carries the workers’ compensation claim.

OSHA’s current business-case guidance says employers in the United States pay more than $1 billion per week in direct workers’ compensation costs for disabling non-fatal injuries. It also emphasizes indirect costs such as accident investigation, replacement-worker training, lost productivity, equipment repair, lower morale, and absenteeism.

For a safety manager, that means contractor training isn’t an administrative courtesy. It’s part of operational risk control.

An illustrative interruption cost

Consider a maintenance shutdown with 35 people affected by a contractor incident. If the event stops work for six hours and the average loaded labour cost is $62 per hour, idle labour alone is about $13,020. Add investigation time, equipment inspection, rework, replacement contractor costs, schedule recovery, management attention, and potential customer penalties, and the operational cost can quickly exceed the value of the work that was originally being performed.

That example is illustrative, not an industry benchmark. Its purpose is to make the risk visible. Training and coordination consume time before work. Poor training and coordination can consume far more time after something goes wrong.

Cost reference: OSHA Business Case for Safety and Health

The orientation isn’t the finish line

A common contractor-management failure is treating orientation as a one-time gate. The worker watches the presentation, passes the quiz, receives a badge, and remains “cleared” even as the assignment changes.

The more useful model is trigger-based. Training or briefing is refreshed when the risk changes.

- The worker moves to a different work area.
- The scope expands beyond the original contract or work order.
- A different piece of equipment or chemical is introduced.
- A new subcontractor joins the job.
- The work shifts from normal operation into shutdown, startup, or emergency conditions.
- Simultaneous operations create a new interface.
- An incident, near miss, or inspection finding exposes a misunderstanding.
- A long gap means the worker may no longer remember site-specific rules.

OSHA’s communication and coordination guidance for hosts, contractors, and staffing agencies emphasizes planning, scheduling, harmonizing safety information, and resolving conflicts before work starts. Those same principles should be revisited when the conditions change.

Coordination guidance: OSHA Communication and Coordination for Host Employers, Contractors, and Staffing Agencies

Gig workers need an exposure test, not a label test

The gig economy complicates this conversation because platform workers can range from a delivery driver who spends two minutes at reception to a skilled independent contractor performing significant work inside an operating facility. Legal classification and employer obligations vary across jurisdictions and work arrangements.

A safety article should not pretend one rule covers them all. Safety managers can still apply a useful operational test.

- Does this person enter an area with hazards they are unlikely to know?
- Can their activity expose employees, customers, or other contractors to risk?
- Do they interact with vehicles, machinery, chemicals, energy systems, patients, or controlled areas?
- Does your organization control information they need in order to perform safely?
- Would an incident interrupt your operations even if the worker isn’t your employee?

If the answers point to meaningful exposure, the organization needs an appropriate control. That control may be a simple access instruction, an escort, a short briefing, a full orientation, or formal task verification. The intensity should follow the risk, not the label attached to the worker.

Build a training passport instead of

repeating everything

Contractor programs often frustrate experienced workers because every site makes them repeat generic content they already know. That wastes paid time and can bury the site-specific information that really matters.

A better long-term model separates portable credentials from local requirements.

Portable record	Site-specific layer
Trade qualifications, general safety modules, recognized certifications, equipment credentials, prior course completions	Emergency procedures, local traffic, restricted zones, equipment differences, reporting channels, permits, simultaneous operations, current changes
Reusable across assignments when still valid	Revalidated whenever site, scope, task, or conditions change

The goal isn’t to let workers skip training. It’s to stop spending time proving the same thing over and over while failing to prove what is different today.

A practical contractor training system

1. Classify the outside worker by exposure and work interface, not only by contract type.
2. Identify portable qualifications and confirm they are current and relevant.
3. Assign site-specific orientation before arrival when practical.
4. Provide task and interface training close to the work, especially when conditions are changing.
5. Name the person responsible for coordinating overlapping work.
6. Use knowledge checks, demonstrations, permits, or field verification in proportion to the hazard.
7. Give outside workers a clear way to report hazards, near misses, injuries, and changing conditions.
8. Trigger retraining or rebriefing when scope, location, equipment, personnel, or operating conditions change.
9. Keep records that show who received what training, when, for which site or task, and with what result.
10. Review contractor incidents and near misses for failures in the training interface, not just failures in individual behaviour.

Where SafetyNow can remove friction

The hard part of contractor training is often not creating one more orientation. It’s assigning the right combination of training to a workforce that changes quickly, documenting completion before exposure, and keeping the records usable when projects, locations, crews, and supervisors change.

SafetyNow can support that operating model with mobile-accessible training, multilingual courses, knowledge checks, printable certificates, role-based programs, manager reporting, custom content, and centralized training records. Organizations can also add their own procedures, site information, and policies rather than forcing outside workers through a completely generic experience.

For construction and other multi-employer environments, that creates a practical path toward a training passport model. Portable content can be reused where appropriate, while site-specific and task-specific requirements can be assigned by role, crew, hazard, or location.

Explore: SafetyNow Online Training | SafetyNow LMS | SafetyNow Construction Resources

> The goal isn’t to give every contractor more training. It’s to make sure the right person receives the right combination of portable, site-specific, and task-interface training before exposure begins.

A 30-day borrowed workforce audit

Safety managers can test the system without launching a major technology project. Pick one contractor-heavy department, shutdown, project, or staffing-agency relationship and follow the training interface for 30 days.

Week	Action	What to learn
1	Map every outside-worker category and every party involved in training.	Where responsibility is unclear or duplicated.
2	Compare actual exposure with the orientation and credentials being required.	Where generic content is replacing site or task knowledge.
3	Observe several arrivals, handoffs, permits, and scope changes.	Where the documented process differs from real work.
4	Fix the top three gaps and define change triggers.	Whether the organization can make responsibility visible and repeatable.

The standard should follow the hazard

Contractors, temporary workers, staffing-agency employees, and gig workers don’t form one legal category. Safety managers should resist treating them as though they do.

They do, however, create a recurring management challenge. Work moves across organizational boundaries faster than safety responsibility sometimes does.

The most reliable response isn’t a longer orientation. It’s a clearer system. Separate portable competence from site knowledge. Identify the task interfaces. Assign ownership. Verify what matters. Revisit the training when the work changes.

And when someone says, “They’re not our employee,” ask the operational question that matters more:

> Are they exposed to our hazards, creating hazards in our workplace, or interacting with our people? If the answer is yes, someone must own the training interface.

Key takeaways

- Employment status should not be used as a shortcut for deciding what safety information a worker needs.
- Generic contractor orientation is only one layer. Site knowledge and task-interface coordination are often where serious gaps remain.
- Use HOST to test the system: Hazards, Ownership, Site and task verification, Transitions.
- Training should be proportionate to exposure. Low-risk visitors need less. High-risk contractors need much more.
- A signature or certificate is evidence of an activity, not proof of safe

performance in your environment.

- Contractor incidents can create substantial operational costs even when the injured person is employed elsewhere.
- Portable training records can reduce repetition, but site-specific information must remain current.
- Retraining should be triggered by changes in scope, location, equipment, crews, or operating conditions.