

**EVERYBODY  
GOES HOME SAFE  
EVERY DAY.**

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# **Contractor Safety Management Program**

## **RECORD OF REVISIONS**

<b>Summary of Revisions</b>	<b>Authorized By</b>	<b>Date of Authorization</b>
3	Peter Murray	January 7, 2026

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## 1. Purpose

The primary objective of the Contractor Safety Management Program (CSMP) is to provide Nova Scotia Power with the necessary assurances that contracted services are consistently meeting the organization's safety performance expectations.

This program equips Nova Scotia Power employees with the tools to manage Contractor safety through the appropriate selection, oversight, and performance management of the contracted services. This allows Nova Scotia Power to effectively and consistently manage the risks associated with contractors working on behalf of the company.

Ultimately, the goal is to prevent any injuries and illnesses that could result from the activities of contractors or their subcontractors working on behalf of Nova Scotia Power. The minimum requirements documented within this standard are intended to supplement all other applicable laws, rules, and regulations.

## 2. Definitions

PHASE	DEFINITION
Asynchronous work	Completing a scope of work independently and without the constant presence of Nova Scotia Power employees.
Can (also May)	Indicates a possibility or a capability – action is possible if a situation arises or where legal and other requirements are not present.
Contract	Refers to any form of agreement or arrangement related to the provision of services or work, which may be documented through various means, including formal statements or procurement activities.
Contract Manager	The Nova Scotia Power employee with accountability for overall management of a Contract and execution of the CSMP requirements.
Contractor	Hired to perform work or provide services under the terms of a contract, rather than as an employee. Contractors are typically responsible for delivering specific outcomes or completing defined tasks, and generally supply their own equipment, labour, and expertise.
Field Level Risk Assessment (FLRA)	Documented assessment of the job, site and conditions and other factors to be performed for each task. A daily FLRA is conducted on site by all people involved in the task. The risk assessment shall be revisited whenever there is a change (e.g. change in conditions, returning from break, weather, etc.) The FLRA is used to identify risks, associated hazards and the control measures required.

PHASE	DEFINITION
Hazard	Any source of potential illness, injury, or damage under certain conditions. Hazard classes considered are usually biological, chemical, electric, ergonomic, physical, psychosocial and safety.
Incident Reporting System	Electronic database for tracking incidents and safety data, including compliance tracking to support proactive safety management and continuous improvement. Currently Nova Scotia Power uses the Cority system: <a href="https://emera.my.cority.com/">https://emera.my.cority.com/</a>
Interested Party(ies)	Person or organization that can affect or be affected by or perceive itself to be affected by a decision or activity, including customers, communities, suppliers, regulators, non-governmental organizations, investors and employees.
Proactive report	A substandard/unsafe/hazardous act or condition that has been identified before it can lead to a near miss incident or loss. Includes safety suggestions'
Risk	The potential for illness, injury, or property damage when exposed to a hazard. Risk = Consequence x Likelihood, where consequence is the severity resulting from an unwanted effect, exposure to a hazard (i.e., percentage of workforce/public exposed to hazard or frequency of exposure to hazard), and likelihood is the expected frequency of occurrence of a specific hazard.
Safety Plan	An overview of how a Tier 1 contractor will execute the work according to their safety program and Nova Scotia Power's safe work practices and related procedures.
Shall	Indicates a requirement - the function/accountability must be done without exception or deviation. Shall does not allow for a deviation.
Should	Indicates a recommendation.
Subcontractor	Whether engaged directly by the Contractor or indirectly through one or more tiers of subcontractors, any party hired to perform a portion of the services awarded to the Contractor by Nova Scotia Power shall be considered a subcontractor for the purposes of the CSMP.
Synchronous work	Work taking place simultaneously with Nova Scotia Power employees performing a task.

### 3. Roles and Responsibilities

The following outlines responsibilities under the Contractor safety management program for Nova Scotia Power employees.

Roles and Responsibilities under the procurement process are defined in the document, “Nova Scotia Power Internal Procurement”. Those involved in the process are to work within their signing authority defined in “Official Guidelines for the Delegation of Authority Process” (N-GP-1), and “Guideline for Obtaining the Proper Commitment and Approvals When Purchasing Equipment, Materials, and/or Contracted Services and for Real Estate Transactions” (N-GP-2).

#### Contract Manager

A Contract Manager shall be identified for each Contract. There may be more than one Contract Manager for a specific Contractor depending on how the scope and services that are provided by that Contractor are allocated. A Contract Manager shall complete an initial NS Power CSMP awareness session through Energy Source and/or an instructor led Nova Scotia Power CSMP awareness sessions by request through [safetydepartmentNova.Scotia.Power@nspower.ca](mailto:safetydepartmentNova.Scotia.Power@nspower.ca).

The Contract Manager shall complete the document, Appendix I (Contract Manager Site Representative Checklist) during the Pre-Work Phase, that delineates responsibilities outlined in the CSMP amongst the Contract Manager and the Site Representative(s). The Contract Manager and the Site Representative(s) will complete the Appendix I and both sign & date the document. A Contract Manager may also act as the Nova Scotia Power Site Representative – in this case Appendix I is not required.

#### Nova Scotia Power Site Representative

Individual responsible for overseeing the work being performed by the Contractor. This is typically the Nova Scotia Power employee requesting the service.

Where different employees are fulfilling the roles of Contract Manager and Nova Scotia Power Site Representatives, the roles of each are to be defined prior to the commencement of work execution. The Nova Scotia Power Site Representative specifically shall ensure their responsibilities under Appendix I are fulfilled. Examples of site representatives are Field Project Leads, Engineers, Technologists, Supervisors, Coordinators, etc. Unless otherwise prohibited by other policies or procedures (e.g. oversight of diving activities), a Contractor may be contracted to perform such duties on behalf of Nova Scotia Power (ex: Contracted Project Managers, Construction Managers, and other experts associated with the scope of work).

A Site Representative shall complete an initial Nova Scotia Power CSMP awareness session through Energy Source and/or an instructor led Nova Scotia Power CSMP awareness sessions by request through [safetydepartmentNova.Scotia.Power@nspower.ca](mailto:safetydepartmentNova.Scotia.Power@nspower.ca).

#### Contractors and Subcontractors

The responsibilities of contractors and subcontractors are to uphold the specific conditions noted in their contract and within the Nova Scotia Power CSMP which includes:

- Reviewing the Nova Scotia Power Hazard ID & Control Checklist form (Appendix B) and assessing the identified hazards vs. the contracted scope for tier 1 contractors.
- Providing a Safety Plan tailored to the scope of work with all required elements as outlined in the Nova Scotia Power Safety Plan Checklist document (Appendix D). The Safety Plan is an overview of how a Tier 1 Contractor will execute the work according to their safety program and Nova Scotia Power Safe Work Practices and related procedures. Tier 2 Contractor's shall provide required information in Appendix S.
- Participating in start-up meeting(s). This will prompt both the contractor, subcontractor(s), and Nova Scotia Power Contract Manager to validate that all required deliverables have been completed and accepted by Nova Scotia Power prior to the execution phase of the scope of work. Appendix L outlines a list of items to review at this stage.
- Providing statistical reporting as outlined in Appendix F.
- Receiving and considering feedback provided on completed and interim work as outlined in Appendix M.

### **Nova Scotia Power Safety Department**

The Nova Scotia Power Safety Department assists the Contract Manager and Nova Scotia Power Site Representative with orientations, job observations, compliance checks, audits, reviews of contractor safety plans, and interpreting as well as assisting with the enforcement of policies, procedures, and regulations. The safety department is responsible to:

1. Support the use and implementation of the CSMP,
2. Continuous improvement of the CSMP over time including the coordination of an annual review.

### **Procurement Department**

The Nova Scotia Power Procurement Department will administer the Request for Proposals (RFP)/Request for Quotation (RFQ) process if used, will notify contractors of their successful bid, provide support for contractor selection and procurement and support a review past performance and evaluations from returning contractors in collaboration with the Contract Manager during Pre-qualification stage. The Procurement Department, with the Contract Manager, will liaise with Corporate Insurance and Legal as required to develop the Contract.

## 4. Document Storage and Retention

Documents applicable to the CSMP are to be stored on the CSMP Online SharePoint Site. The Appendix F (contractor requirement) should be completed on ISN (for those who are on ISN). For non-ISN contractors, the Nova Scotia Power Contract Manager will upload the contractor's completed Appendix F to the CSMP Online SharePoint Site. ISN is introduced in section 2.1.

The quizzes and orientation records for the Contractor shall be retained by the Contract Manager and submitted to [safetydepartmentNova Scotia Power@nspower.ca](mailto:safetydepartmentNova_Scotia_Power@nspower.ca). The intent is to ensure the capability to produce orientation records.

### Phase 1: Pre-Qualification & Contract Planning

This section outlines activities under the CSMP that must be completed prior to finalizing the selection of a Contractor and awarding the Contract. It is necessary to systematically assess the contractors' safety performance, reputation and their current safety policies and procedures, before the Contract is awarded. This is done utilizing our collective experience with the contractor, our prior evaluations completed on the contractor, and documents requested from the contractor in advance of awarding the work.

During this phase, the scope of work must be determined and applicable contract specifications developed. It is also necessary to convey Nova Scotia Power's requirements that impact any safety-driven responsibilities of the Contractor. Requirements would include applicable qualifications and resourcing (e.g. people and equipment). Any known owner-identified hazards as well as any expectations around suitable controls will also be conveyed to the Contractor.

Nova Scotia Power uses a two-tier approach based on high-energy states and high-risk conditions to classify the relative risk level of the work and specify safety requirements for the Contractor.

During this phase, for Tier 1 contracts, Appendix B "Nova Scotia Power Hazard ID & Control Checklist" shall be initiated by the Nova Scotia Power Contract Manager and provided to the Contractor and subsequently finalized by both parties during Phase 2.

During this phase, for Tier 2 contracts, Appendix S will be initiated and provided to the contractor and completed by both parties during Phase 2.

#### 1.1 Classify Contract According to Associated Hazards

Contractor activities shall be assessed and categorized based upon the hazards associated with the work based on the details outlined in the following sections. If there are any questions as to whether the CSMP would be applicable to a particular service, or the classification (tier) of a contractor, contact the Safety Department. General inquiries can be submitted to [safetydepartmentNova Scotia Power@nspower.ca](mailto:safetydepartmentNova_Scotia_Power@nspower.ca).



### 1.1.1 Tier 1

Tier 1 work contains high-risk activities where one or more high energy states or high-risk conditions exist (except for motion at or above 50 km/h). This type of work encompasses a range of tasks that involve significant hazards and require stringent safety measures. Work is considered high risk when there is the possibility that high energy states or high-risk conditions are present (see EMRA-SMS-STND-2.03, Serious Injury & Fatality (SIF) Prevention Program). This includes (but is not limited to) Contractors (or any Subcontractors who may be involved) who perform activities that could result in a fatality, significant injury, or significant property damage.

Appendix B (Hazard ID & Control Checklist) contains a non-exhaustive list of examples of Tier 1 work, and a list of all high energy states or high-risk conditions.

### 1.1.2 Tier 2

Tier 2 work includes tasks where **no high energy states or high-risk conditions are present**—except for motion at or above 50 km/h—and therefore does not meet the criteria for Tier 1 classification.

Examples of Tier 2 work could include:

- Custodial/janitorial
- Field training services
- Windshield installation
- Furniture assembly or office equipment setup
- Minor painting or touch-ups
- Signage installation
- Surveying
- Soil sampling
- Noise monitoring
- Waste collection (excluding municipal)
- Engineering
- Single source technicians/engineering support
- Snow removal/lawn maintenance

When work is confirmed to be Tier 2, then Appendix S (Tier 2 Contractor Safety Checklist) is the only CSMP appendix that needs to be completed. For Tier 2 contractors commencing a scope of work for services that are expected to continue for an extended period (e.g. fleet service agreements) Appendix S must be reviewed annually at minimum (rolling 12-month period) and as applicable if there are changes to the scope of work Appendix S should be updated accordingly.

### 1.1.3 Exceptions to the CSMP

There are Contractors and other visitors to our sites to whom the CSMP does not apply:

- Auditors and engineers whose functions (including the functions of any subcontractors they may employ) do not have associated hazards beyond a typical site tour and would be accompanied by an NS Power employee.
- Delivery/supply services (vending, bottled water, laundry, food) outside operational areas.
  - Equipment drop-off (no rigging or lifting by the vendor)
- Computer/photocopier services
- Visitors to NS Power sites, including regulatory agencies
- Contractors not performing physical work at NS Power site
- Classroom training and instruction
- 

## 1.2 Develop and Communicate Nova Scotia Power's Hazard ID & Control Checklist of Activities

Appendix B must be completed by the Nova Scotia Power Contractor Manager for Tier 1 contractors based on the intended scope(s) of work to determine the expected hazards and appropriate mitigations. The hazards identified at this stage are those determined by Nova Scotia Power and known to apply to the required scope of work.

Note: The Appendix B is not intended to provide an exhaustive list of hazards and controls and should only be used for guidance. Additional hazard identification and control measures may be required.

## 1.3 Communicate Emera and Nova Scotia Power Policies

Policies shall be referenced in Contract documentation. Policies applicable and available to all contractors can be found at: <https://www.emera.com/policies>.

## 1.4 Confirm and Communicate Insurance & WCB

For contractors in ISN, Workers Compensation Board (WCB) and insurance documentation will be available through ISN.

### Insurance

All Contractors shall provide proof of appropriate levels of insurance (as specified in the Contract) to ensure they have the financial capacity to cover the maximum foreseeable loss for the scope(s) of work. The level and type of insurance shall be determined through consultation with Nova Scotia Power's Procurement, Corporate Insurance and Legal departments.

- Proof of insurance shall be provided to Nova Scotia Power or a current copy available in ISN.

- Corporate Insurance shall be notified of any incidents involving third parties where any loss is experienced.

### **Workers' Compensation Board (WCB) Documentation**

Nova Scotia based Contractors not registered with ISN, shall provide proof that they are registered and in good standing with the Nova Scotia Workers' Compensation Board by providing a clearance letter. In Nova Scotia, these letters are issued quarterly. While most contractors have a single Standard Industrial Classification (SIC) code, large companies with multiple divisions may have separate SIC codes for WCB coverage. Contractor Managers must ensure the SIC code on the Experience Rating Statement matches the scope of work being performed. Contact the Safety Department if unsure.

Contractors originating outside of Nova Scotia must provide either:

#### **Option 1: Proof of Registration with the Nova Scotia Workers' Compensation Board (WCB NS)**

This is mandatory, regardless of the Contractor's WCB status in other provinces, if:

- The scope of work falls under WCB NS's mandatory industry classification, and
- The Contractor has three or more workers in Nova Scotia for five or more days in a calendar year.

#### **Option 2: Exemption Letter from WCB NS**

If the contractor does not require Nova Scotia WCB then the contractor shall provide confirmation that the contractor's WCB from their home province will extend coverage to their workers while working in Nova Scotia. If the contractor cannot provide confirmation of coverage, then NS Power may request the contractor to obtain optional coverage with Nova Scotia WCB.

Nova Scotia Power may request that contractors obtain Nova Scotia WCB voluntary coverage or special protection coverage regardless of exemptions listed above – this applies to both Tier 1 and Tier 2 contractors. This may apply in situations such as when the contractor's work could grow in scope to exceed the allowable duration and industry classification criteria. Contact the Safety Department at [safetydepartmentNova.Scotia.Power@nspower.ca](mailto:safetydepartmentNova.Scotia.Power@nspower.ca) for support if needed.

## **1.5 Confirm and Communicate Environmental Requirements**

The following environmental requirements apply to all Nova Scotia Power sites:

- Nova Scotia Power Contractor Environmental Requirements Handbook
- Nova Scotia Power work specific environmental procedures
- Nova Scotia Environment Act and regulations
- Canadian Environmental Protection Act and regulations
- Applicable municipal by-laws

The Contract Manager is responsible for engaging with Nova Scotia Power Environmental Services to ensure applicable processes pertaining to environmental policies are followed for contractor activities. The Contract Manager will communicate if any scope specific environmental permits are required, the status of those permit requests, and any specific conditions within the permits that must be fulfilled as a part of the contractor's scope of work.

## **1.6 Selecting a Contractor**

If a scope of work goes to an RFP, a scorecard is used that weighs safety, cost and other elements to evaluate received proposals from competing Contractors. If a scope of work is not subject to an RFP process, a formal scorecard may not be required; however, it must still be verified that the chosen Contractor satisfies the relevant criteria outlined in the pre-qualification phase, as detailed in this section and Appendix B.

During bid evaluation, bidders must first meet all safety requirements. Only those who pass the safety review proceed to financial assessment. Safety must be a scored criterion worth at least 10% of the total. Outcomes are:

- fail (insufficient insurance, WCB coverage or written programs),
- pass (verified to have sufficient insurance, WCB coverage, written programs), or
- pass with distinction—all elements of pass and also when the safety component of the proposal exceeds expectations and earns the full 10% (scaled accordingly depending on the specific scorecard defined for the bid).

Scoring criteria for safety-related components is based on a pass/fail scale. Should a Contractor not meet the specified Insurance and WCB requirements they shall be scored an automatic failure. The NSP Contractor Manager shall evaluate a Contractor's bid based on the following criteria and use discretion when evaluating all criteria below. The NSP Contract Manager may request the support of the Safety Department to aid in evaluating submissions.

If a Contractor has an active connection with NS Power on ISN and has a minimum B grade they shall be given a pass on the Nova Scotia Power Procurement Portal (formerly Bonfire) for the safety portion of the bid.

### **Health & Safety Programs**

The bidder shall demonstrate that they have a comprehensive written health and safety program relative to the scope of work. Smaller bidders lacking a comprehensive written health and safety program should be able to demonstrate through their program that they have procedures/plans for hazard identification & control, and emergency response plans and protocols.

Bidders with a valid safety certification from a Nova Scotia WCB safety certified audit provider (example: Certificate of Recognition (COR)) shall be given full points for this section. Out of province contractors may have a safety certification from a recognized safety certified audit provider (such as

COR or ISO 45001) – if validated, the out of province Contractor shall be given full points for this section.

### **Safety Performance**

A bidder's leading and lagging indicators shall be evaluated. Leading indicators to evaluate include a bidder's workplace audit, inspection, and observation program. Lagging indicators to verify include regulatory fines/violations issued in the past 3 years; and WCB variance rate and records of corrective actions taken to address substandard variance rate.

Score (Number)	Criteria / Condition
<b>N/A (fail)</b>	Doesn't meet basic requirements (e.g. WCB, Insurance). Not being considered.
<b>1-10 (pass)</b>	Meets basic requirements, as score increases, bid details relating to safety goes progressively above requirements noted.

## **1.7 Complete Nova Scotia Power CSMP Appendices Applicable to Pre-Qualification Phase**

The following table specifies the required pre-qualification risk mitigation elements that are to be in place by the end of the pre-qualification phase. The required elements will depend on the tier of the activities being completed.

Appendix	Title	Description	Tier	
			1	2
B	Nova Scotia Power Hazard ID & Control Checklist	Used by Nova Scotia Power and Contractors to identify and communicate known hazards within scope. To be communicated to potential Contractors during pre-qualification phase and included with RFPs.	X (Initiated)	
S	Nova Scotia Power CSMP for Tier 2 Contractors	Nova Scotia Power CSMP applicable to Tier 2 contractors.		X (Initiated)

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Note. Please refer online [Nova Scotia Power SMS](#) for the current version

Appendix	Title	Description	Tier	
			1	2
N/A	Environmental Handbook	Guideline supplied to Contractors to communicate Environmental requirements. Applicable at all phases of the Contract.	X	X
N/A	Emera/NSP Policies	Presented to Contractors to communicate numerous Emera and Nova Scotia Power policies. Applicable at all phases of the Contract.	X	X

## Phase 2: Pre-Work

This section outlines all necessary activities between the selection of Contractor up until the time at which work is approved to proceed.

During this phase, for Tier 1 contractors:

- Appendix B is acknowledged by the Contractor,
- Appendix D and L are completed,
- any outstanding deliverables identified in the Phase 1 documentation is provided (e.g. those items referenced in Appendix B),
- Safety Plans are finalized and associated procedures are provided by the Contractor.
- For Tier 2 contractors, Appendix S will be finalized at this time.

### 2.1 Review and Verification of Contractor's Safety Programs

This section outlines the two process streams to complete a Contractor safety program review and verification. Nova Scotia Power has incorporated the online ISN Contractor Management platform to aide in review and verification of potential contractors and as part of our records management for Contractor safety documentation. Prior to work execution commencing the processes outlined in sections 2.1.1 (for ISN registered Contractors) or 2.1.2 (for Contractors not registered in ISN) shall be completed.

In all cases, the Contractor shall follow their own Health, Safety and Environment (HSE) program which shall meet or exceed Nova Scotia Power policies, practices, procedures, standards, and regulatory requirements. If the Contractor's HSE program does not meet Nova Scotia Power expectations and/or regulatory requirements, the Contractor shall follow Nova Scotia Power policies

and procedures. These exceptions shall be reviewed and agreed to as part of the planning and/or assessment and orientation stages prior to work starting by the Contract Manager or Site Representative.

### **2.1.1 Nova Scotia Power Qualified ISN Contractor**

Generally, for Tier 1 work, ISN compliance for a Contractor is required. If a Tier 1 Contractor is not in ISN or does not have good standing with ISN, an exception must be sought and approved as outlined in the process described in section 2.1.2. For Tier 2 contractors, being in good standing on ISN can confirm the elements in Appendix S (Tier 2 Contractor Safety Checklist).

ISN performs the following functions:

#### **Information Submission**

Contractors submit detailed information, including safety programs, insurance policies, training records, and incident reports.

#### **Review and Verification**

ISN's Review and Verification Services team reviews the submitted documentation and conducts interviews with Contractor personnel to ensure the implementation of safety policies and programs.

#### **Grading System**

Contractors are assigned a grade based on their compliance with both ISN's and Nova Scotia Power-specific requirements. This grade is crucial for maintaining eligibility to work with hiring clients.

#### **Ongoing Monitoring**

Contractors must regularly update their information and maintain compliance to keep their grades high. This includes quarterly updates to their safety questionnaires and continuous submission of relevant documents.

### **ISN Qualified Contractor Review and Verification Grading**

ISN's evaluation of a Contractor's submission can lead to the identification of deficiencies, therefore the Contractor must achieve a grade from ISN per the following table. A grade of "B" or higher is required unless a Contractor variance approval form (Appendix R) is approved. Appendix R shall be facilitated and completed by the Nova Scotia Power Contract Manager.

Grading	Outcome
A (100% - 85%)	Exceptional; no restrictions. Recommended using this Contractor.

Grading	Outcome
B (84.9% - 70%)	Satisfactory: no restrictions. It is acceptable to use this Contractor.
C (69.9% - 50%)	Marginal: Variance Approval Form (Appendix R) required.
F (<50%)	Unsatisfactory: Variance Approval Form (Appendix R) required.

For long-term contracts (e.g. master service agreements), the Nova Scotia Power Contract Manager shall verify grades on an ongoing basis in ISN and investigate and work with the Contractor to correct deficiencies when required. To aid in this, ISN offers users the ability to subscribe to daily “Contractor Grade Change Notification” reports.

Initiating work with contractors having a grade below “B” is by exception only and may be permitted only after:

- Thorough review of the Contractor by the Contract Manager and the Safety Department as to why the Contractor has an insufficient grade, and:
- Submission of an Action Plan by Contractors that cannot achieve a B grade due to WCB variance and/or lagging indicators (NSP Statistical Questionnaire):
  - Contractor must develop and submit an injury reduction action plan that outlines a summary of the previous injuries that they have incurred and the corrective actions that were completed following each.
  - The Contractor’s submitted action plan (which is part of the information requested in Appendix R) must be reviewed and approved by the NSP Contract Manager before the Contractor can begin work. The NSP Contract Manager may consult subject matter experts (e.g. Safety Department) within Nova Scotia Power to help evaluate the submitted action plan.
  - The Area Manager, Area Director and a Safety Department representative have signed a Contractor Variance Approval Form. Documentation of approved Contractor Variance Approval Form (Appendix R) must be uploaded to ISN.

In the event that a Contractor’s grade changes to a C or F during the Contract:

There will be grace period of 10 business days to address the deficiency, unless the deficiency is the result of lapsed insurance and/or good standing with WCB. If the grace period lapses without either the grade increasing to an acceptable level or an action plan per below the work shall be stopped.



- The Contractor shall not be permitted to work until lack of insurance and/or WCB Good Standing Letter is addressed. This shall be addressed without delay.
- If the contractors ISN grade decreases below a B (excluding because of the above) an action plan shall be developed containing:
  - an outline of the deficiencies contributing to the unacceptable grade
  - all interim controls that will be put into place to mitigate risks applicable to the deficiency.
  - actions that will be taken to permanently address the deficiency and return the contractor to an acceptable grade.

### **2.1.2 Nova Scotia Power Qualified Tier 1 ISN Exception Contractor**

This process applies when Tier 1 contracted work has been identified and awarded to a Contractor that is not active in ISN. A Tier 1 ISN Exception Contractor shall only be used for short cycle, short timeline, urgent work. The goal should be to get the Contractor registered in ISN if the Contractor is to be awarded work routinely.

The Contract Manager in consultation with the Safety Department, shall use the process outlined in Appendix R to exempt the Contractor from ISN participation.

## **2.2 Nova Scotia Power Approval of Contractor's Safety Plan**

The requirement for a Safety Plan document applies to Tier 1 contractors only. For Tier 2 contractors, the "Key Components of the Workplace Safety and Operational Plan" in Appendix S addresses the required equivalent components of the safety plan.

It outlines how a Contractor will execute work in compliance with their safety program and all applicable Nova Scotia Power requirements. It includes essential elements such as a clearly defined scope of work, supervision and reporting structures, and communication methods and frequencies, including meetings, toolbox talks, and tailboards. The plan ensures that regulatory posting requirements ([https://www.novasafe.ca/en/topics/posting\\_requirements](https://www.novasafe.ca/en/topics/posting_requirements)) are met, hazard identification and controls are completed and reviewed, and a Field Level Risk Assessment (FLRA) template is included and approved by Nova Scotia Power. Additionally, it outlines the schedule for observations and inspections, emergency procedures, and the incident reporting process.

The plan also covers safety education, including general and site-specific training and orientations, and any specialized training required. It includes a subcontractor management plan to ensure all parties involved adhere to the CSMP. Each element in the plan is reviewed for quality and revised as necessary to ensure comprehensive coverage of all safety aspects.

The Contractor's submitted Safety Plan shall sufficiently address the core 10 elements below and be evaluated by the Contract Manager:

1. Scope of Work/Work Activities
  - Including housekeeping plan.

2. Contractor's Reporting Structure/Team
3. Communication & Check-in Plans
4. Regulatory Requirements
  - Including controlled products and waste practices.
5. Hazard Identification and Control Plans
6. Safety Observations
7. Emergency Procedures/Emergency Plans
8. Incident Reporting Process
9. Safety Training
10. Subcontractor Management

The Contract Manager may engage internal or external subject matter experts to aid in evaluation of the Safety Plan. If one of the core 10 elements is not applicable the Contract Manager shall make a note that it is not applicable. Appendix D (Safety Plan Checklist) outlines the specific requirements of each element and shall be completed for Tier 1 contractors at this stage.

In developing a Safety Plan, the Contractor shall review relevant Nova Scotia Power safe work practices (SWPs) in the latest NSP Safety Manual which shall be provided either in print or electronically by the Nova Scotia Power Contract Manager.

The Contractor's representative shall receive a copy of Appendix B from the NSP Contract Manager that is prepopulated. Contractor Management shall review, add any additional job steps, equipment, hazards and controls to the Appendix B and sign.

The Contractor's representative shall receive approval from NSP Contract Manager on their submitted Safety Plan before executing Tier 1 work outlined in the Contract.

## **2.3 Hold a Startup Meeting**

A Startup Meeting shall be conducted between the Contractor and the Contract Manager prior to starting Tier 1 work. The start-up meeting checklist, Appendix L, shall be completed at this time and serves as a minimum standard to meet CSMP requirements. For Tier 2 contractors, Appendix S contains any content that shall be reviewed at the start-up meeting for Tier 2 work. The NSP Contract Manager may introduce items or topics not included in the agenda.

If subcontractors are engaged under the scope of the Contract, they shall be considered part of the Contractor's team for the purposes of this meeting. The Contractor is responsible for ensuring that relevant subcontractor representatives meet all requirements outlined prior to their mobilization and are informed of all applicable safety, operational, and contractual requirements.

At this time Appendix I (if applicable) shall be finalized between the Contract Manager and the Nova Scotia Power Site Representative.

### 2.3.1 Develop a Contractor Oversight Plan

During the Startup meeting, a Contractor oversight plan shall be documented by the Contract Manager. The level of Contractor oversight by Nova Scotia Power personnel required for each Contract will be determined by the Contract Manager in advance of the Contractor beginning work activities. The following factors shall be considered when determining the appropriate level of oversight:

- Scope and duration of the Contract
- Familiarity with the Contractor
- Routine vs non-routine work
- Location of the work activities
- Synchronous or asynchronous work activities
- If the work has an associated high-risk review

Nova Scotia Power oversight can be completed with the assistance of subject matter experts from within or outside of the organization. Any oversight should be documented (safety observations, safety conversations, compliance checks, etc.) in Cority. The Contract Manager may coordinate oversight with other employees/hired contractors (i.e. request a local supervisor or safety specialist to do an observation). A general overview of the Contractor oversight plan shall be documented during the Startup Meeting (Appendix L, Appendix S for Tier 2 contractors).

Critical to the safe completion of the work is determining whether the scope of work is going to be completed synchronously with Nova Scotia Power work execution or asynchronously from Nova Scotia Power work execution.

In cases of synchronous work, the actions of both the Contractor and the Nova Scotia Power crew, may have implications for the other. In these cases, the supervision for the Nova Scotia Power employees may be extended to the Contractor(s) involved. Examples include work in a powerplant or substation, traffic control, live set pole installation, etc.

In cases of asynchronous work, there are no Nova Scotia Power employees working in conjunction with the Contractor and thus an Nova Scotia Power supervisor would not be on the job. In these cases, the oversight will be implemented through an Nova Scotia Power employee or Contractor whose role includes such management and supervision functions as defined in the oversight plan.

For Tier 1 contractors that are new to Nova Scotia Power, safety observations shall be conducted daily at the beginning of the Contract. Over time as competency for the various tasks being performed by the Contractor are assessed, observation intervals may decrease.

For familiar contractors signing or renewing a Contract where the scope of work is Tier 1, the frequency of Nova Scotia Power oversight shall be determined prior to the work starting.

All Contractor work shall, at minimum, be executed and overseen using the observation frequencies noted in SWP 10, Section 4 (Risk Identification), which emphasizes hazard identification through

procedures, knowledge, and visual inspections, and requires consideration of high-risk work in accordance with the business unit's High Risk process:

- Power Production: Observations per the High-Risk Task Committee procedure.
- Transmission & Distribution: Procedure available (Example: applicable Standard Work Method). All supervisors shall complete a minimum of one high risk task check sheet weekly.

For the latest guidance please confirm with SWP 10 of the safety manual for the current year.

Any positive or areas for improvement, findings shall be documented. For any safety-related hazards or incidents observed, corrective or preventative actions are to be initiated and tracked to completion in the Incident Reporting System.

## **2.4 Contractor Orientations**

It is a requirement that all Contractor employees successfully complete orientations prior to commencing work.

1. The required departmental general Nova Scotia Power orientation
  - a. includes either the Thermal General Safety Orientation; the Hydro General Safety Orientation; the Facilities General Orientation; or Energy Delivery / Storm General Safety Orientation.
  - b. These orientations should be completed using the ISN platform but can be completed in person or virtually when required.
2. A site-specific orientation

Both general and site-specific orientations are valid for a twelve-month period. The Contract Manager is responsible to ensure all Contractor employees have completed required orientations prior to commencing work. Contractors may deliver the Nova Scotia Power general and site orientations for their employees when approved to do so (this is to be documented in Appendix D).

## **2.5 Complete Nova Scotia Power CSMP Appendices Applicable to Pre-Work Phase**

At this stage the following appendices apply and shall be completed:

Appendix	Title	Description	Tier	
			1	2
B	Nova Scotia Power Hazard ID & Control Checklist	Used by Nova Scotia Power and Contractors to identify and communicate known hazards within scope. To be communicated to potential Contractors during pre-qualification phase and included with RFPs.	X (Finalized)	
D	Safety Plan Checklist	Used by Nova Scotia Power to verify that safety requirements are covered in Contractor's Safety Plan.	X (Finalized)	
I	Contract Manager Site Representative Checklist	Used by Nova Scotia Power to clearly define key responsibilities within Contractor Safety Management Program (CSMP) when a Site Rep is resourced	X	
L	Start-up Meeting Checklist	Used by Nova Scotia Power to verify program requirements have been met and project can be safely executed.	X	
N/A	Orientations	Presented to Contractors to communicate site specific safety/operational information	X	X
R	Contractor Variance Approval Form	Required when Tier 1 Contractor is not in ISN or has grade requiring action (see conditions noted in CSMP).	X	
S	Nova Scotia Power CSMP for Tier 2 Contractors	Nova Scotia Power CSMP applicable to Tier 2 contractors.		X (Finalized)

## Phase 3: Work Execution

Work Execution outlines procedures for Contractor mobilization, performance monitoring, incident reporting, and Contract changes. The Contract Manager or Site Representative monitors Contractor HSE performance based on risk, task complexity, and Contract duration, using inspections, observations, and documentation.

### 3.1 Mobilization

Prior to the Contractor mobilizing, operational areas shall be notified that contractors are going to be in their area. The responsibility for this is outlined in Appendix I.

### 3.2 Performance Monitoring

The Contract Manager, Site Representative or designate is responsible to monitor the HSE aspects of the Contractor's work activities. The extent of monitoring is influenced by several factors including but not limited to:

- Contractor Oversight Plan
- Tier of work
- Leading and lagging safety performance indicators

Documentation for proof of monitoring may include:

- Documented observations
- Compliance checks
- Copies of Contractor safety education meeting minutes
- Copies of Contract Manager/ Site Representative meeting minutes
- Proactive / Good Catch / Reliability reporting
- Documented lessons learned and corrective actions post execution

Performance monitoring includes conducting and documenting observations of work areas and job observations of tasks being completed. Observations shall be carried out by both the Contractor and Nova Scotia Power's site representative or designate. The Contract Manager / Site Representative may look for documented evidence of the contractor's performance monitoring during a site visit and/or an audit. Nova Scotia Power reserves the right to audit and one aspect of performance monitoring may be an audit.

Any act or condition that is an immediate risk to the health and safety of workers or the public shall result in the immediate halt of work until the risk has been mitigated.

#### 3.2.1 Incident Reporting

Any Nova Scotia Power employee, Contractor or sub-Contractor employee who observes a hazardous act or condition shall report the matter to the Contract Manager/Site Representative. As per the "Duty to report injuries" section of the Workplace Health and Safety Regulations "An employee at a workplace must report all injuries to the employer without undue delay." Employees are also required to stop the work immediately unless stopping the activity creates additional hazards. The Contract Manager must consult the Safety Department for incidents that meet the criteria for notifying Emera and other affiliates, per EMRA-SMS-PROC-9.02 Emergency Communication.

#### 3.1. General

- 3.1.1. All incidents, regardless of severity, shall be reported to the Nova Scotia Power Contract Manager / Site Representative as soon as reasonably practical.
- 3.1.2. Contractors are responsible to initiate and complete investigations. Preliminary findings, in writing, are to be provided to Nova Scotia Power within 24 hours.
- 3.1.3. Completed written reports for all incidents are required to be received by Nova Scotia Power in a time frame set by Nova Scotia Power dependant on any supporting activities required to verify any pertinent information regarding the event.
- 3.1.4. Contractors are responsible to report all recordable injuries to the Worker's Compensation Board within five business (5) days.
- 3.1.5. Where applicable, the Contractor is responsible to forward the final report to LAE and WCB.

### **3.2. Serious Injury or Fatality**

- 3.2.1. In the event of a serious injury or fatality (as defined by Edison Electrical Institute), the priority is to care for casualties and prevent further injuries. Securing the scene is required as per SWP 03 – Incident Response.
- 3.2.2. The Nova Scotia Power Contract Manager / Site Representative will follow the notification process as outlined in SWP 03 – Incident Response.
- 3.2.3. Responsibility for notification of next of kin of the injured Contractor employee or Sub-Contractor lies with the Contractor Supervisor (or designate).

### **3.3. Environmental Incidents**

- 3.3.1. All environmental incidents shall be reported to the Nova Scotia Power Contract Manager / Site Representative immediately for appropriate action.

#### **3.2.1.1 Incident Reporting to Corporate Insurance**

Contract Managers / Site Representatives shall contact the Emera Corporate Insurance Department by phone within 24 Hours of an incident involving third parties. For this process, a third party can refer to a customer, Contractor, supplier, business partner or member of the public. Incidents include but are not limited to (contact Corporate Insurance if in doubt):

- Serious injury or fatality
- Third party liability incidents
- Electrical Contacts



- Automobile claims
- Environmental/pollution claim
- Environmental/pollution claim where there is release of pollutants to any body of water (i.e. lakes, oceans, etc.)

### **3.2.2 HSE Noncompliance**

HSE noncompliance may occur when a contractor fails to follow Nova Scotia Power policies and/or applicable regulatory requirements.

#### **3.2.2.1 Nova Scotia Power Policies**

The Nova Scotia Power Contract Manager / Site Representative has the right to stop the job until further notice if deficiencies are found, especially in the case of repeat violations. Noncompliance will result in corrective actions appropriate to the nature and seriousness of the issue, as determined by Nova Scotia Power. Previous violations by the contractor or subcontractor and any extenuating circumstances will also be considered when deciding the appropriate corrective action. Actions can include, but not be limited to, coaching, warnings (verbal and/or written), suspension and/or termination, subject to the terms of the applicable contract. Noncompliance and corrective actions are handled on a case-by-case basis. Unsatisfactory safety performance shall be communicated to the safety departments and could result in the contractor not working on future Nova Scotia Power projects.

#### **3.2.2.2 Regulations**

Contractors, Contractor Supervisor, Contractor employees/Sub-contractors shall co-operate with LAE Officers and other regulatory agencies during site inspections/investigations. Contractors shall notify Nova Scotia Power Contract Manager / Site Representative immediately of a site inspection by a LAE Officer and provide Nova Scotia Power with a copy of any orders or inspection reports within 24 hours of receiving. Deficiencies noted by the LAE Officer must be rectified per the directives issued and reported to the Nova Scotia Power Contract Manager / Nova Scotia Power Site Representative.

### **3.3 Managing Contract Changes**

Any changes to the scope of a Contract must be reviewed to determine whether the existing approved documentation adequately addresses the Health, Safety, and Environmental (HSE) impacts of the change. This review shall include the Contractor's manager, the Nova Scotia Power Contract Manager, the Nova Scotia Power Site Representative (if applicable) and any other applicable personnel. These changes shall be documented as revisions or additions to:

- Appendix B (Nova Scotia Power Hazard ID & Control Checklist)
- Appendix D (Safety Plan Checklist) and/or Contractor's Safety Plan; or



- Contractor's JSAs (or equivalent)
- Appendix S (if Contractor is Tier 2)

For contractors who's scope of work for services that are expected to continue for an extended period (e.g. fleet service agreements) the above appendices must be reviewed annually at minimum (rolling 12-month period) when there has been no changes in their scope of work and/or contract that would warrant a revision. The Appendix B must be signed and dated by both the Nova Scotia Power Contract Manager and Contractor Rep to acknowledge the hazards and controls have been reviewed. If there is an update or change to Appendix B that warrants a change in the Contractor's Safety Plan, then the Contractor must submit their revised Safety Plan (or JSAs) to the Nova Scotia Power Contract Manager for approval.

### 3.4 Monitoring and Contractor Statistical Reporting

The Contractor is responsible to submit statistical data (Appendix F) to ISN or the Contract Manager pertaining to hours worked and incident rates. For definitions of incident types Contractors are expected to report refer to Appendix F.

### 3.5 Complete Nova Scotia Power CSMP Appendices Applicable to Execution Phase

At this stage the following appendices apply and shall be completed:

Appendix	Title	Description	Tier	
			1	2
B	Nova Scotia Power Hazard ID & Control Checklist	Used by Nova Scotia Power and Contractors to identify and communicate known hazards within scope. To be communicated to potential Contractors during pre-qualification phase and included with RFPs.	(Revised if required)	
D	Safety Plan Checklist	Used by Nova Scotia Power to verify that safety requirements are covered in Contractor's Safety Plan.	X (Revised if required)	
F	Monthly Report Form	Used by Contractor to capture and record safety stats, sent to Nova Scotia Power Contract Manager or completed on ISN	X	X
S	Nova Scotia Power CSMP for Tier 2 Contractors	Nova Scotia Power CSMP applicable to Tier 2 contractors.		X (Revised if required)

WARNING: Printed Copies are uncontrolled and may not be up to date

Note. Please refer online [Nova Scotia Power SMS](#) for the current version

## Phase 4: Completion

This section outlines necessary actions during completion of the work and demobilization from site.

### 4.1 Demobilization

During demobilization of the Contractor, the Contract Manager or Site Representative should ensure the worksite is reviewed to verify Contract conditions have been met, all required work and documentation has been completed, that any materials have been returned if applicable, that any unsafe or environmentally hazardous conditions have been rectified and the site has been properly cleaned up and material properly disposed. If there are any safety-related deficiencies that need to be addressed, those are to be entered into the Incident Reporting System and documented on the Contractor's Performance evaluation (Appendix M).

### 4.2 Evaluation

At this stage the scope-of-work has been fulfilled, and the performance of the Contractor is to be evaluated. Consideration should be given to HSE, quality, execution, Contract management and any other appropriate criteria. At a minimum for ongoing contracts and service agreements, once per twelve-month period Nova Scotia Power shall evaluate the applicable Contractor; either in ISN or utilizing Appendix M (which would then be uploaded to ISN for any ISN registered contractors).

When contractors are working at multiple locations, the evaluation for the Contractor's work may be completed by Contract Manager(s) on the basis of performance metrics including leading and lagging indicators, job observations recorded from all employees within the job observation database, through feedback arising from routine meetings with site representatives, soliciting feedback from employees who have had engagements with the contractor, and also considering the Contractor's adherence to corrective actions following an incident (if applicable).

### 4.3 Complete Nova Scotia Power CSMP Appendices Applicable to Completion Phase

At this stage the following appendices apply and shall be completed:

Appendix	Title	Description	Tier	
			1	2
M	Performance Evaluation Scorecard	Used by Nova Scotia Power to rank and provide feedback based on a Contractor's performance.	X	
S	Nova Scotia Power CSMP for Tier 2 Contractors	Nova Scotia Power CSMP applicable to Tier 2 contractors.		X (Performance Evaluation Portion)

## List of Appendices

Appendix	Title	Description	Tier	
			1	2
B	Nova Scotia Power Hazard ID & Control Checklist	Used by Nova Scotia Power and Contractors to identify and communicate known hazards within scope. To be communicated to potential Contractors during pre-qualification phase and included with RFPs.	X	
D	Safety Plan Checklist	Used by Nova Scotia Power to verify that safety requirements are covered in Contractors Site Safety Plan.	X	
F	Monthly Report Form		X	
I	Contract Manager and Site Representative Checklist	Used by Nova Scotia Power to clearly define key responsibilities within Contractor Safety Management Program (CSMP)	X	
L	Startup Meeting	Used by Nova Scotia Power to verify program requirements have been met and project can be safely executed.	X	
M	Contractor Evaluation Form	Used by Nova Scotia Power to rank and provide feedback based on a Contractor's performance.	X	
R	Contractor Variance Approval Form	Required when Tier 1 Contractor is not in ISN or has grade requiring action (see conditions noted in CSMP).	X	

Appendix	Title	Description	Tier	
			1	2
S	Nova Scotia Power CSMP for Tier 2 Contractors	Nova Scotia Power CSMP applicable to Tier 2 contractors.		X

## List of Obsolete Appendices

Appendix	Title	Description
A	Tier 1, 2, and 3 Checklists	Used by Nova Scotia Power and Contractors to assist stepping through the Contractor Safety Management Program (CSMP)
C	Contractor Service Provider Responsibilities	Guideline supplied to Contractors and service providers to reinforce responsibilities
E	Incident Report Form	Form used by Nova Scotia Power; can be used by Contractors in the absence of their own Incident Report form
G	Health, Safety & Environment Program Checklist (non-COR)	Used by Nova Scotia Power to verify quality of Contractor's HSE program when non-C
H	Health, Safety & Environment Selection Criteria	Filled out by Contractor then reviewed and scored by Nova Scotia Power
K	Observation/ Inspection Form	Form used by Nova Scotia Power; can be used by Contractors in the absence of their own Site Inspection form
N	Environmental Handbook	Guideline supplied to Contractors and service providers to communicate Environmental requirements

Appendix	Title	Description
O	Orientations	Presented to Contractors to communicate site specific safety/operational information
P	EMA/NSP Policies	Presented to Contractors to communicate numerous Emera and Nova Scotia Power policies
Q	Nova Scotia Power Safety Manual	Work methods and other requirements used by Nova Scotia Power and Contractors.

## Revision History

Revision Number	Effective Date (YYYY/MM/DD)	Approved By	Change/ Review Comments
1.0	2018/05/18		Created Document
2.0	2021/11/30		Document Revised
3.0	2025/__/__		