

HPL Subcontractor Process

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PURPOSE

The purpose of this document is to provide clarity on Hundseth Power Line Construction's process for hiring and managing subcontractors.

SCOPE

This Administrative Procedure applies to all divisions within Hundseth Power Line Construction herein to referred to as "Hundseth," "HPL" or the "Company."

DEFINITIONS

eCompliance: an online software used by HPL.

Hazard Aspect and Risk Assessment (HARA): The overall formal process to identify hazards/ aspect and evaluate the risk of injury or illness arising from exposure to a hazard/aspect, with an objective to eliminate the risk or to utilize control measures to reduce the risk.

Prime Contractor: A prime contractor is responsible for coordinating the health and safety activities at multi-employer worksites. Every worksite must have a prime contractor if the worksite has multiple employers or self-employed persons; and meets the prescribed circumstances. The prime contractor for a work site is to be determined in the prescribed manner. The prime contractor for a worksite shall carry out the prescribed activities. The project owner is the prime contractor unless they designate the prime contractor. The prime contractor for a worksite shall carry out the prescribed activities. A prime contractor is required if:

- There are 10 or more workers or self-employed persons under the direction of two or more employers;
- Are operating in the following industries:
 - Construction (excluding construction of, or renovation to, residential dwellings consisting of less than four units;
 - Forestry
 - Oil and gas.

Site Orientation: The supervisor at the jobsite must review all job steps, hazards, controls, emergency response plan (location of first aid kits/fire extinguishers/burn kits/muster point) and any related emergency procedures and any other relevant information from the Hazard Aspect and Risk Assessment (HARA). The subcontractor must print and sign their names to verify they understand the HARA.

Subcontractor: An individual, or company or other legal entity that carries out work or performs services for HPL pursuant to a contract for service or purchase order.

Supervisor: A person who is authorized by an employer to oversee or direct the work of the employer's worker or subcontractor.

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ROLES & RESPONSIBILITIES

Prime Contractor:

- Coordinating the health and safety activities:
 - Ensuring policies, procedures and safe work practices are used on the worksite; and
 - Preparing a written plan that coordinates activities and identifies the prime contractor's backup and the supervisors on the worksite.
- Identifying and informing employers and self-employed persons about hazards for which the prime contractor is responsible;
- Ensuring, insofar as reasonably practicable, that the employers or self-employed persons at a worksite eliminate hazards identified by the prime contractor before activities or operations begin on the worksite and after they have commenced;
- Ensuring that the employers of self-employed persons at a worksite reduce or control hazards that cannot be reasonably eliminated;
- Ensuring that the contact information of the prime contractor is posted in a conspicuous location at the worksite;
- Ensuring that all activities at the worksite that may affect health and safety are coordinated;
- Ensuring, as far as reasonably practicable, that all employers or self-employed persons have adequate and appropriate occupational health and safety policies and procedures, safe work practices and equipment, and competent and informed workers;
- Identifying a competent person to oversee and direct, on behalf of the prime contractor, the activities of employers and self-employed persons at the worksite;
- Preparing a written plan that explains how the requirements are to be met and delivering a copy of the written plan to all employers and self-employed persons before any work commences.

Subcontractor:

- Cooperate with the prime contractor to ensure information regarding health and safety programs and coordination of worksite activities are properly communicated between all parties.
- Provide HPL a copy of their valid Workers Compensation Rate Statement, Certificate of Insurance, Certificate or Recognition (COR™) or Small Employer Certificate of Recognition (SECOR™), Training Records, HPL Contractor Health, Safety & Environmental Questionnaire, Health and Safety Policy & Manual, and any other requested documentation required to conduct the work safely.
- Follow HPL's safety management system and the Drug and Alcohol policy.
- Participate in all orientation, site meets, startup meetings, hazard aspect and risk assessments and training required to complete the work.

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- Report all incidents to HPL and participate in all incident investigations.
- Participate in post-job performance reviews with HPL.

Manager:

- Select subcontractors to be used during the planning stages or the job/project from HPL’s Approved Subcontractor List.
- Communicate with the subcontractor that only the employees HPL has received training records for will be approved to work on an HPL site.
- Review contract terms with the subcontractor prior to hire.
- Obtain all required documentation prior to commencing work (ex. purchase order, locates, etc.)
- Ensure all employees and subcontractors are aware of their health, safety and environment responsibilities prior to commencing work and followed for the duration of the work.
- Ensure documented site inspections are completed and submitted on FOR-HPL-HSET-502 Subcontractor – Work Methods and Site Inspection on eCompliance as per HPL-POL-HSET-104 Work Methods, Site and Facility Inspection Policy.
- Ensure documented subcontractor evaluations are completed on FOR-HPL-HSET-534 Subcontractor Performance Evaluation and submitted through eCompliance as required.
- Communicate to all impacted divisional managers of any changes to an approved subcontractor.
- Provide HSET relevant time to approve or not approve a new subcontractor.

Supervisor/Foreman:

- Select subcontractors and their employees from HPL’s Approved Subcontractor List.
- Conduct a site orientation by reviewing the HARA with the subcontractor employees on site prior to allowing them to commence work.
- Ensure all good catch, near miss and incident reports are reported on form HPL-FOR-HSET-504 through eCompliance.
- Participate in the Subcontractors incident investigations.
- Ensure subcontractors perform work following the HPL Safety Management System, customer requirements and all Provincial Occupational Health and Safety Acts and Regulations.
- Ensure all hazards/aspects are controlled.
- Ensure all members on site are wearing the proper personal protective equipment.
- Conduct a FOR-HPL-HSET-502 Subcontractor – Work Methods and Site Inspection on eCompliance as per HPL-POL-HSET-104 Work Methods, Site and Facility Inspection Policy.
- Provide feedback to the managers for the biannual reviews.

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Health, Safety, Environment & Training (HSET):

- Send the subcontractor prequalification document and a copy of HPL’s Drug and Alcohol Policy to the requested subcontractor.
- Review and approve/not approve all required safety documentation from subcontractors prior to work commencing:
 - Workers Compensation Rate Statement/status of account (WCB)
 - Incident/injury statistics
 - Training Records
 - Health & Safety Manual
 - Certificate of Insurance
 - Certificate of Recognition (COR™) or Small Employer Certificate or Recognition (SECOR™) status
- Coordinate biannual subcontractor review meetings
- Report all incidents involving subcontractors to the hiring client.
- Conduct subcontractor site inspections when on site.
- Manage the approved subcontractor list.
- Communicate to the relevant managers any change to the subcontractor list.

Finance:

- Provide guidance and support with all Certificate of Insurance documents.
- Provide feedback to the managers for the biannual reviews.

PROCEDURE

1. Determine project requirements

- a. Review the approved subcontractor list to determine which company can conduct the work.
- b. If there is no available company on the approved subcontractor list, communicate with HSET and the subcontractor to gather the information required to obtain an approved status prior to commencing work.

2. Process to obtain an approved status with a subcontractor

- a. Provide HSET with the primary contact for the requested subcontractors.
- b. HSET will provide the requested subcontractor the documents required to become an approved subcontractor.
- c. HSET will inform the employee requesting the subcontractor once they are approved and will update the approved subcontractor list.

3. Review process:

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- a. All approved subcontractors must have:
 - i. Valid Certificate of Insurance meeting the requirements of the project
 - ii. WCB account in good standing
 - iii. WCB Rate Statement
 - iv. Valid COR/SECOR certificate
 - v. Completed HPL Subcontractor Health, Safety & Environmental Questionnaire
 - vi. Health and Safety Policy & Manual (in the event the subcontractor does not have a Health and Safety Manual they will work under Hundseth Power Lines)
 - vii. Valid employee training records required to the complete the job safely.
- b. Under emergency circumstances, a “Temporary Approved” status will be granted for a short duration that must be documented on the Approved Subcontractor List. This will be determined and agreed upon by HSET, the Manager and the Vice President. If all three parties can not agree, other measures must be put in place. If the parties still can not all agree, the subcontractor will not be used on an HPL site.
- c. HSET will send out the approved subcontractor list biannual for review and it will be posted in the HPL Operations – HSET dropbox folder and on the HPL website.

4. Monitoring Subcontractors

- a. All approved subcontractors will be monitored through inspections and evaluations. Managers, Supervisors and HSET will conduct worksite inspections on FOR-HPL-HSET-502 Subcontractor – Work Methods and Site Inspection on eCompliance as per HPL-POL-HSET-104 Work Methods, Site and Facility Inspection Policy and Subcontractor evaluations on FOR-HPL-HSET-534 HPL Subcontractor Performance Evaluation and submitted through eCompliance. Subcontractor evaluations will be completed at whichever of the following three events occur first:
 - i. Completion of the subcontractors scope of work;
 - ii. The end of the project, or
 - iii. Annually
- b. Approved Evaluation Grades:
 - i. All approved Subcontractors should achieve “Very Good” or higher for each graded question and obtain an overall percentage of 80% to remain on the list.
- c. All approved subcontractors will be monitored during the biannual subcontractor list review.

5. Record Maintenance

- a. All prequalification documents are located on eCompliance and the S:Drive.
- b. The Approved Subcontractor list is located on the HPL Operations – HSET drive in Dropbox and on the HPL website.

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REFERENCES

- HPL-POL-HSET-104 Work Methods, Site and Facility Inspection Policy
- HPL-POL-HSET-106 Good Catch, Near Miss & Incident Reporting and Investigation Policy
- HPL-APR-HSET-400 Good Catch, Near Miss and Incident Management & Investigation Procedure
- HPL-APR-HSET-403 HPL Incident Reference Chart
- HPL-APR-HSET-405 Hazard Aspect and Risk Assessment
- HPL-POL-EX-100 Health & Safety Policy
- HPL-POL-EX-103 Responsibility & Accountability Policy
- HPL-FOR-HSET-534 HPL Subcontractor Performance Evaluation Form
- HPL-FOR-HSET-535 HPL Subcontractor Health, Safety & Environmental Questionnaire
- HPL-FOR-HSET-502 HPL Subcontractor Work Methods and Site Inspection
- HPL-FOR-HSET-521 HPL Weekly COVID-19 Subcontractor Certification Acknowledgement
- HPL-FOR-HSET-522 HPL COVID-19 Vaccination Policy Subcontractor Certification
- HPL FOR-HSET-536 HPL Approved Subcontractor List
- www.hundseth.ca