

## CDM REGULATIONS 2015

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### Dutyholder: **The Principal Contractor**

What do you have to do?

The principal contractor is a key duty holder who is responsible for managing health and safety on the construction site.

#### 1. Liaise with the other duty holders:

You must work with the client and principal designer throughout the project.

Talk to the client about their needs and expectations for the project (this is sometimes called the client brief) to better understand the project requirements.

You should check that the client is aware of their CDM duties.

This will give you the opportunity to ask questions and offer suggestions. Where the site is part of an occupied building or structure you will need to liaise with the client and any existing contractors, such as those responsible for facilities management.

You will need to liaise and co-operate with the principal designer, who is responsible for managing the pre-construction phase and design work during construction, and share any information which may be relevant to help them consider health and safety in their design.

You may be able to use your experience to discuss construction methods and opportunities to enhance worker health and safety during the design development.

#### 2. Manage the construction phase:

Planning is an essential part of managing a construction site and should start as early as possible to identify health and safety risks, control measures and resources needed to reduce or eliminate them. This approach should take place for all the key phases of the construction work.

You will also need to think about how you will monitor site health and safety standards and control measures so that they remain effective.

Planning can be straightforward as asking:

- What does the project involve?
- What needs to be done and when?
- How can it be done?
- Who do I need to do it?
- What other resources do I need?

You will need to consider client requirements and any other information, such as that provided by the principal designer.

You must consider the health and safety risks to all those affected such as workers and members of the public. This means asking:

- What could go wrong?
- Who might be harmed and how?
- What do I need to do to make it safer or healthier?

Contractors who will be working on site need to be involved in planning how they will carry out their work safely and with regard to health as early as is practicable.

When identifying appropriate control measures, find out if the work could be avoided or done in a different but safer way. If not, see how you can reduce the risks through a variety of means. Use of personal protective equipment (PPE) must be a last resort. This approach is known as taking into account the general principles of prevention.

Involving the workforce and liaising with others is an important part of deciding how you will manage and co-ordinate the project.

#### 3. Prepare the construction phase plan:

You must draw up a plan which describes how health and safety will be managed during the construction phase. Pre-construction information you have received and any client requirements you have established will help in drawing up the construction phase plan. The plan should be:

- proportionate to the size and nature of the work, and the risks involved
- workable and realistic
- sufficiently developed to allow work to start on site
- regularly reviewed and added to as new trades start.

The plan must be developed as soon as practical before setting up the construction site and starting the work. Early issues such as mobilisation, welfare, demolition, groundworks and other high risk activities should be addressed.

The nature of construction work means that some contractors may not have been appointed before the work on site starts, so the construction phase plan must be updated with this information when it is known, and before the contractors start work.

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The plan should not be cluttered with documents (such as generic risk assessments, records of how decisions were reached or detailed safety method statements) that get in the way of a clear understanding of what is needed to manage the construction phase.

### 4. Ensure welfare facilities are provided

You are responsible for ensuring welfare facilities are provided and are suitable and sufficient for the size and nature of the site. They must be available as soon as the work starts and remain until the construction work is completed.

You may be able to use existing facilities. If not, a mixture of both existing and new will need to be provided.

Welfare facilities include:

- lit and ventilated toilets (suitable for men and women)
- lit and ventilated washing facilities next to the toilets, including hot, cold or warm running water, soap or hand cleaner, towels or means of drying hands
- supply of drinking water and cups
- facilities for rest (tables and chairs)
- where required, changing rooms and lockers.

The facilities must be regularly cleaned and cater for the expected number of workers on site.

### 5. Provide site induction:

You must ensure a suitable site induction is provided to every site worker. The induction should be site specific and be relevant to the size and scope of the work, and level of risk involved.

The following induction topics should be considered:

- Senior management's commitment to health and safety.
- An outline of the project.
- Management of the site, for example who the site manager is.
- Site-specific health and safety risks, for example any requirement to work near overhead cables.
- Control measures on site, for example site rules, vehicle and pedestrian segregation, PPE, temporary electrics, and site restrictions such as delivery arrangements.
- First aid arrangements.
- Accident and incident reporting arrangements.
- Training details, for example provision of toolbox talks and task briefings.

- Arrangements for consulting the workforce on health and safety.
- Individual workers' responsibility for health and safety.

A site induction should also be provided to those not regularly working on site, such as the client or architect, and be tailored to suit the nature of their visit and knowledge of the project.

### 6. Secure the site

You must ensure that reasonable steps are taken to prevent unauthorised access to the site. Close co-operation between the client or others when working in occupied or shared premises will help achieve this objective.

The site boundaries should be clearly marked out using suitable means. These will depend upon the size and nature of the project. You must consider the surrounding area and the site's proximity to others, such as local residents, schools, shops, public roads and footpaths. You will need to leave the site in a safe condition at the end of the day and ensure that any existing occupiers are not put at risk while your work is in progress. Any occupiers will need to know of, and co-operate, with your plans.

### 7. Appoint contractors and workers:

You must also ensure all contractors and workers on your site have the necessary skills, knowledge, training and experience for the work they are carrying out.

Additional information, instruction, training and supervision will be needed to support those who are still developing their experience in order to become self-sufficient in safe and healthy construction practices.

#### Employing workers:

When you employ or control people doing work for you, you must make sure that:

- they have the necessary skills, knowledge, training and experience to do the job safely and
- without putting their own or others' health and safety at risk
- they are properly supervised and given clear instructions
- they have the right tools, equipment, plant, materials and protective clothing
- you talk with them (or their representatives) about health and safety issues

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- you make arrangements for employees' health surveillance where required.

### Appointing contractors:

When you appointing contractors or sub-contractors:

- check the health and safety capabilities of the people you plan to use
- give them the health and safety information they need for the work
- talk about the work with them before they start
- make sure that you have provided everything you agreed (for example safe scaffolds, the right plant, access to welfare facilities and so on)
- monitor their performance and remedy any shortcomings. You can make specific enquires about basic health and safety capabilities in a number of ways.
- For smaller jobs, you could look for straightforward evidence that potential contractors are capable of carrying out the work, for example by requiring references from previous construction work, checking qualifications or training records or by asking them how they plan to carry out the work safely without risk to the health and safety of themselves or others.
- For more complicated or higher risk jobs, further enquiries will be needed. For example, the Public Available Specification PAS 91 provides a set of health and safety questions that can be asked by construction clients and those who appoint designers and contractors as part of the pre-qualification process for construction projects. The PAS is freely available through this link (once a simple registration has been completed):

### 8. Provide the right management and supervision:

You must ensure that those managing and supervising the work have the right blend of skills, knowledge, training and experience and that there is an adequate number of supervisors.

Whilst the supervision provided will need to reflect the level of risk associated with the work, the supervisor on the ground will need to be familiar with the type of work planned.

You should assess the degree of supervision you will need, taking account of the skills, knowledge, training, experience and likely behaviour of the workers.

### 9. Engage contractors and workers:

Key information on health and safety risks including relevant parts of the construction phase plan needs to be shared with contractors and communicated with workers through induction and worker engagement.

Consultation with workers is key to the successful management of health and safety on site. It should be a clear two-way process, giving an opportunity for either parties, or their safety representatives, to contribute to decision making.

### Engaging contractors:

You have a responsibility to ensure safe working, co-ordination and co-operation between contractors.

This is essential to ensure that all contractors and workers on the project are aware of:

- what has to be done and what is expected of them
- when it will be done
- how it will be done safely and without risks to health.

At a practical level co-ordination will enable different trades to access shared facilities (for example, the use of scaffold) so that they do not create risks for each other or compromise the safe and healthy working conditions on site.

Co-ordinating the work of the contractors and ensuring co-operation between them can be addressed at site progress meetings, and when any key activity, such as a new phase, commences.

### Engaging workers:

Workplaces where workers are involved in helping to take decisions about health and safety are safer and healthier. Collaboration with your workers helps you to manage health and safety in a practical way by:

- helping you to spot workplace risks
- making sure health and safety controls are practical
- increasing the level of commitment to working in a safe and healthy way.

You must consult workers, in good time, on health and safety matters. In workplaces where a trade union is recognised, this will be through trade union health and safety representatives. In non-unionised workplaces, you can consult either directly or through other elected representatives.

Consultation involves employers not only giving information to workers but also listening to them and taking account of what they say before making decisions that affect health and safety.

### Issues you should consult workers on include:

- risks arising from their work

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- risks from others or the environment they are working
- proposals to manage and/or control these risks
- the best ways of providing information and training

### 10. Monitor the risks on site:

You will need to monitor site health and safety standards and control measures to ensure that they remain effective.

This can be as simple as asking people what they are doing or carrying out visual checks or inspections.

### 11. Contribute to the health and safety file:

The health and safety file contains information relating to the project which is needed to ensure the health and safety of anyone carrying out future construction or maintenance work on the building or structure.

The principal designer is responsible for preparing the health and safety file and you should pass on to them any relevant health and safety information required.

At the end of the project the principal designer provides the client with the health and safety file. On projects where the principal designer appointment finishes before the end of the construction phase, you, as principal contractor, will take on the responsibility for the file and for handing it over to the client.

Requirements for the health and safety file, including its structure, content and format, should be identified before the construction phase and communicated to you by the principal designer.