



**St Mary's
University
Twickenham
London**

Construction Work Policy

HSPG 15

Version 6 – January 2023



1. Statement of Policy

- 1.1. Construction work involves special hazards for those engaged in the work and also for those who may share premises where construction is being carried out. Any construction work carried out on University premises has the potential to cause injury and ill-health to staff and students. Unless carefully planned and considerately carried out such work also has the potential to cause disruption to the work of the University and annoyance to individuals.
- 1.2. The University is committed to ensuring that any construction work carried out at its premises is done without risks to the health and safety of its employees and others. Construction work will be taken to include demolition.
- 1.3. Even small-scale construction work, such as general maintenance, repair and replacement) has risks associated with it and the provisions of Section 2(1) and 3(1) of the Health and Safety at Work Act etc. apply to the University even when the work is contracted out. These sections require the employer to do what is reasonably practicable to ensure the health and safety of employees and others who may be affected by work activities.

In order to meet the above requirements, the University will ensure that its staff are not engaged in construction and demolition work unless they have the competence to carry out the work safely and without risks to health. Where contractors are employed, due regard will be had to their approach to Health and Safety including their requisite policy. Contractors working on site must comply with the rules at Appendix A and the University's other relevant rules including the Lone Working Policy and the Site Contractor's Handbook. They will also be expected to follow any permit to work system which may be in force for the work they intend to do.

2. Application of CDM regulations

- 2.1 Construction work lasting longer than 30 working days and with more than 20 people working simultaneously at any point in the project or involves more than 500 person days of work or that involves any demolition, is subject to the requirements of the Construction (Design and Management) Regulations 2015 (CDM). These Regulations impose duties on designers and contractors, and also on clients. The University is likely to find itself subject to the client duties for any significant construction work that it authorises.
- 2.2 Where a project is notifiable, the client, (contractor or principal contractor where there is a written agreement that they will carry out the client's duties) must give notice in writing to the Health and Safety Executive (HSE) as soon as is practicable before the construction phase begins. This can be achieved by completing an F10 form which can be found on the HSE website. The notice must:
 - contain the particulars specified in Schedule 1 of the CDM Regulations
 - be clearly displayed in the construction site office in a comprehensible form where it can be read by any worker engaged in

the construction work;

- if necessary, be periodically updated.

- 2.3 Whilst unlikely to be relevant to the majority of university construction projects, contractors and/or University employees engaged in their appointment should have due regard to the requirements of The Building Safety Act 2022. This is more likely to apply where new buildings are constructed.
- 2.4 The University will ensure that, where the CDM Regulations apply, no construction commences until an adequate health and safety plan covering the work has been prepared. Any health and safety file, prepared in relation to any project, will be kept readily available for inspection and that when any such file is handed over to a third party the necessary steps will be taken to ensure that the party understands the purpose and nature of the file.
- 2.5 If a construction project is not notifiable at first, but there are subsequent changes to its scope so that it fits the criteria for notification, the client must notify the work to the relevant enforcing authority as soon as possible.
- 2.6 All construction work will be planned in accordance with relevant standards or statutory provisions. Where the work is of a significant nature, and certainly where CDM Regulations apply, the Health & Safety Officer, employee representatives and any employees who may be directly affected will be provided with information relating to the work. Such information will cover the nature and likely duration of the work and any risks and control measures which will be taken.

3. Principal Designer

- 3.1 In order to meet the requirements of the CDM Regulations the University will appoint, at the appropriate time, a Principal Designer and principal contractor for each project. It will ensure that those appointed are competent and have adequate resources available to carry out their duties competently. No such appointments will be made until the University is reasonably satisfied that this is the case.
- 3.2 The University will ensure that the Principal Designer is appointed as soon as is reasonably practicable, but in any case, before the commencement of the work to which CDM relates. The University will provide the Principal Designer with all relevant information about the condition of any premises at or on which construction work is to be or intended to be carried out.
- 3.3 The Principal Designer will work with designers to ensure that any design meets the requirements of the Regulations, ensuring a pre-tender stage health and safety plan is in place, advising the University and contractors and coordinating health and safety issues.
- 3.4 Adequate information will be provided (and continue to be provided as it becomes available) to the Principal Designer in relation to the site, premises and University activities where the construction work is carried out. Where this information is not readily to hand, steps will be taken to obtain it.
- 3.5 No construction work will be allowed to commence until an adequate health and safety plan has been prepared and authorized (by the Principal Designer or other competent person representing the University). A health

and safety file will be kept readily available for inspection.

4. Organisation

4.1 Director of Estates and Campus Services

- Will ensure that all construction work is carried out in accordance with this policy. Because of the variable nature of construction work and the range of projects to which this policy may be applied it is not practicable to assign the individual arrangements to specific post holders. It is recognised that specific tasks covered by the arrangements may be delegated by the Director of Estates and Campus Services or even contracted out.

4.2 Health & Safety Officer

- Will ensure that the overall effectiveness of this policy is monitored.
- Will, on request, provide advice and assistance on health and safety matters to the Director of Estates and Campus Services, and others who have responsibility for construction projects carried out on University property.
- Will, at the earliest opportunity, inform the relevant Project Manager or other responsible member of that Directorate of any matter relating to construction work which, in the opinion of the Health & Safety Officer, constitutes a significant risk to University staff, students, visitors or any contractors.

5. Work not subject to CDM Regulations

- 5.1 Where CDM requirements do not apply, it will be ensured that construction work is carried out to the highest health and safety standards in compliance with other related statutory provisions.
- 5.2 Checks will be made to ensure that any contractors used for small scale construction work are competent and have made adequate provision for health and safety. To achieve this, pre-qualification systems for contractors will be established.

6. Arrangements applicable to all work

- 6.1 No University employee will be permitted to undertake construction work unless they have the competence to carry out the work safely and without risks to health.
- 6.2 Where the work is subject to a Permit to Work system, this will be explained to the contractor before they commence work.
- 6.3 Steps will be taken to provide information to employee representatives and also employees who may be directly affected. This information will include nature and likely duration of the work and any risks and control measures which will be taken.
- 6.4 Where it is practicable to do so, the Health & Safety Officer will be informed of:
- the intention to undertake construction work
 - the nature and likely duration of the work and:

- where it is notifiable to the HSE, the identity of the Principal Designer (if CDM applies), the name of the principal contractors and details of any risks identified and control measures which will be taken.
- 6.5 Steps will be taken to co-operate and co-ordinate action and exchange information with the contractor to ensure that statutory duties are met, that procedures will be followed in the event of serious and imminent danger (e.g., a fire), and that arrangements for health and safety remain appropriate to the risks involved during commissioning and handover.

7. Lone working and out of hours working

- 7.1 Contractors and/or University staff should have due regard to the University's Lone Working Policy.
- 7.2 In general, there are no specific legal prohibitions regarding working alone, but there is a legal requirement to have more than one worker for certain activities which are judged too dangerous for one person e.g.:
- Construction (Health, Safety and Welfare) Regulations 1996, (as amended 2015). Working on a ladder which requires footing and certain work which requires immediate supervision of a competent person, such as dismantling scaffolding
 - Control of Substances Hazardous to Health (COSHH) 2002 (as amended 2013). Certain fumigation work and other work with substances hazardous to health
 - Carriage of Dangerous Goods by Road Regulations 1996 (as amended 2009). Unloading of petroleum spirit at petrol filling stations and certain other premises
 - Electricity at Work Regulations 1989. Work at, or near, a live electrical conductor
 - Confined Spaces Regulations 1997 (as amended 2009) Entry into a confined space, for example, sewers or tanks
 - Road Traffic (Carriage of Explosives) Regulations 1989. Supervision of vehicles conveying certain explosives.

7.3 Hazards Encountered by Lone Workers

The hazards faced by lone workers are not unique to this category of worker but their potential severity is increased by the absence of co-workers or supervisors. Potential hazards include:

- violence and robbery
- abusive customers
- extreme weather
- back injury due to heavy or awkward lifting
- electric shock
- smoke, gases and other inhalation hazards
- falls
- burns

- chemical over exposure
- explosion
- animal bites
- biohazards
- falling asleep at the wheel of a vehicle
- traffic hazards.

Lone working out of hours is discouraged by the University and at all times must be supported by a prior Risk Assessment.

8. Risk assessment

- 8.1 All contractors, before commencing any work at any time, must submit a Risk Assessment and Method Statement (RAMS) to the Director of Estates at least seven days before commencement. Exceptions to this must be agreed in advance with the Director of Estates or his delegated team member.
- 8.2 A Faculty/Service generic risk assessment covering all employees may be appropriate for a low risk environment e.g., lone working in an office. Specific risk assessments will be a requirement for high risk activities such as fieldwork in remote locations. It is expected that the risk assessment process is undertaken as a collaborative exercise by both the lone worker and their line manager/supervisor and that the agreed safe working procedures are recorded and communicated to all persons who may be required to work alone and any other employees who have a role to play in ensuring their safety.
- 8.3 Appendix B sets out considerations specific to lone working and working out of hours.

Appendix A

Rules for Contractors

Contractors working on University premises are required to observe the following rules. This is to help ensure the health and safety of staff, students, members of the public and contractors themselves.

Access and security

- Contractors must report to the security office before starting work in order to check that it is safe and convenient to do so.
- At sites where ID badges are provided for contractors then they must wear the badges in a prominent position (wherever possible).
- Car parking is very limited on some sites. Car parking for contractors will only be by prior arrangement with the security staff.
- Deliveries of materials or plant/equipment must be notified in advance to the security staff.
- Some areas of the University are restricted. Contractors must not enter these areas without prior permission which must be arranged through the security staff. Restricted areas are computer rooms, laboratories and associated stores/technicians' rooms, and classrooms where a class is in progress.
- Contractor's tools, equipment and personal belongings are left on the premises at the contractor's own risk.

Safety of students and staff

- Contractors are responsible for providing adequate barriers, fences and warning signs and these must be used where the work creates a risk to staff, students or members of the public.
- Contractors are responsible for leaving work areas reasonably clean, tidy and free from obstructions.
- Paints, solvents, cleaning agents, LPG cylinders and other hazardous materials must be properly stored when not in use. The security and domestic staff may be able to arrange temporary storage for such materials.
- Power tools, hand tools and hazardous plant and equipment must not be left unattended. The security and domestic staff may be able to arrange temporary storage for tools.
- Where a work operation may give risk to significant noise, dust or vibration (e.g. through walls or floors) the contractor must check with the estates department before starting the operation.
- Contractors are not permitted to bring radios, CD or cassette players onto the site.

Fire Safety

- The University is a partial no-smoking environment. Contractors must not smoke anywhere in the buildings at any time.
- Contractors must read the Fire / Emergency Action notice for the area(s) in

which they intend to work. In the event of fire or the fire alarm sounding contractors should follow the procedure given in the notices.

- Hot work (e.g., welding, gas flame cutting, brazing, soldering or paint stripping with a gas torch or blowlamp, etc.) must not be carried out without a permit signed by the Project Officer or a member of the Estates staff.

General safety

- Contractors must check with the Project Officer / Electrician or Estates staff before connecting electrical equipment to University supplies.
- Use of 110 volts power tools is preferred, but if use of 240 volts equipment is unavoidable then the contractor must provide and use a suitable residual current device (RCD).
- Use of University toilets and washing facilities is permitted, but contractors are asked to take reasonable care to leave them in a clean state.
- Use of University showers by contractors is not permitted (except safety showers).
- The University has trained first-aiders and first-aid facilities and these will be available to contractors. First-aiders may be contacted by telephone via the switchboard or by contacting staff at the reception area.
- All accidents / dangerous occurrences must be reported to the safety and security manager and a University accident report form completed.

Appendix B

Lone and out of hours working risk assessment considerations

1. Overriding principles

- 1.1. If required, the lone worker should receive the correct information and training with regards to the hazards identified.
- 1.2. Arrangements should be in place to establish a form of communication with the lone worker.
- 1.3. Periodical monitoring of lone working practices should be carried out to ensure that all procedures are correctly working.

2. Compiling the assessment

- 2.1 The following outlines the five steps that must be taken for a lone working risk assessment:

a) Identify the hazards to which the person(s) may be exposed

The hazards are likely to be the same for a particular activity whether lone working or not. The assessment of the risks to which a lone worker may be exposed must consider normal and foreseeable scenarios.

The hazards may be such that the risk cannot be controlled sufficiently and therefore lone working is prohibited. Examples of high risk activities where at least one other person may need to be present include:

- working in a high risk confined space where a supervisor may need to be present, along with someone dedicated to the rescue role;
- people working at or near live electricity conductors;
- other electrical work where at least 2 people are sometimes required.
- High risk activities that require specific attention when planning safe lone working arrangements include working with:
 - chemicals, particularly corrosive, toxic, explosive, flammable, asphyxiant, or narcotic substances, products or reactions;
 - cryogenic substances;
 - class 3B/4 lasers where the beam is not fully enclosed;
 - power tools and machinery;
 - working on or near water;
 - working at height.

b) Identify all persons who may be required to work alone

Consideration must be given an individual's ability to carry out their activities safely on their own. Some individuals may be at greater risk than others for example new and expectant mothers and young persons or those who are new to a role. Consideration must also be given to students due to their possible lack of experience in the work they are doing. It may be necessary to make reasonable enquiries to ensure that lone workers are medically fit to undertake the work alone. Both routine work and foreseeable emergencies may impose additional physical and mental burdens on the individual.

c) Assess whether current controls are adequate, and if not, consider what additional/alternative control measure(s) can be put in place

Examples of control measures could include the provision of suitable training, occupational health fitness assessments and/or effective communication strategies. It may be necessary to prohibit certain tasks or activities if the risks cannot be adequately controlled (see hazard section listed above).

d) Record the findings

Record your risk assessment findings for any significant risks identified. Have a procedure in place that ensures that the lone worker is made aware of the findings of the risk assessment.

e) Monitor and review the risk assessment

Arrangements which are implemented to ensure the safety of lone workers need to be subject to a monitoring regime which is commensurate with the risk, by their supervisor/line manager. This may range from simple periodic visits, to the more complex implementation of 'Permits to Work', Review the risk assessment regularly for example if any significant changes take place, following an accident / incident or following any concerns being raised. Any review should make sure existing control measures are adequate and check if any additional controls are needed.

Where contingency plans form part of the arrangements, they should be clear, precise, communicated, practised and subject to periodic monitoring and review.

3. Risk assessment questions

3.1 The following is a list of key questions which can be used as a checklist for the completion of a suitable and sufficient risk assessment. It provides an indication on whether the risks can be adequately controlled by one person:

- Does the workplace present a special risk to a lone worker e.g. due to environment, location, contents, unfamiliarity, etc.?

- Does the work activity present a special risk to a lone worker – equipment, process, substance, location, time, members of the public?
- Is there safe entry and exit from the location for one person – both in the course of the normal work and in the event of an emergency? This may include information on not using lifts in an emergency.
- Can the equipment in use be adequately controlled and handled by one person?
- Can all goods, substances and materials in use be safely handled by one person?
- Is the working environment appropriate – heating, lighting, ventilation, etc.?
- Are the welfare facilities adequate and accessible - toilet, washing facilities, drinking water, etc.?
- Does the lone worker have, or have access to, first aid facilities?
- Does the lone worker have access to a suitable means of communication, or other means of summoning assistance, should this be required – telephone, mobile phone, radio, inactivity alarm, etc.?
- Is there a risk of violence associated with the work activity and/or location?
- Is the lone worker more at risk due to their gender or inexperience?
- Has the employee received sufficient information, instruction and training to enable the work to be undertaken safely whilst alone?
- Has the employee received specific training in how to respond to foreseeable emergencies which may arise in the course of their work alone?
- Is the lone worker medically fit to undertake the work alone? And is there a requirement for on-going health checks, health monitoring?
- Are there contingency plans in place should an alert/alarm be raised by a lone worker and are these plans well known and rehearsed – what to do, who to contact, etc.?

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