



United Learning – Health and Safety Topic Policy

Construction Projects

Glebe Primary School



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United Learning

Health and Safety Topic Policy – Construction Projects

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1. Scope

- 1.1 This Policy forms part of the health and safety arrangements detailed in the '*United Learning Group Health and Safety Management Policy*'. It outlines the arrangements in place to achieve compliance with the duties contained within the Health and Safety at Work etc Act 1974, and specifically with the Construction (Design and Management) Regulations 2015.
- 1.2 It is applicable to all schools and central office locations (herein referred to as 'Sites') carrying out or planning any form of construction work.

2. Implementation

- 2.1 The requirements of this Policy must be implemented within 12 weeks of the date of publication

3. Interpretation

- 3.1 The following definitions apply to this Policy:
- Construction project – means any building work and includes construction, alteration, repair, upkeep, demolition, and installation of plant (for a complete definition, refer to Regulation 2(1) of the Construction (Design and Management) Regulations 2015).
 - CDM - Construction (Design and Management) Regulations 2015.
 - Hot Work – Any process that could be a source of ignition, which is carried out in an area not specifically designed for that task.
 - CPL - Construction Projects Lead

4. Responsibilities

- 4.1 Regardless of the size of the construction project being undertaken, all Sites must ensure that they:
- sensibly plan the work so the risks involved are managed from start to finish
 - have the right people for the right job at the right time
 - cooperate and coordinate their work with others, e.g. other site users or neighbouring businesses
 - have the right information about the risks and how they are being managed
 - communicate this information effectively to those who need to know
 - consult and engage with workers about the risks and how they are being managed
 - appoint in writing a principal designer and principle contractor where a project is likely to require the work of more than one contractor. Where these roles are not formally appointed, the respective duties revert to the client.
 - Schools should only act as the client where they can be confident that they understand and are competent to perform all of the client's duties – contact the Estates team if you are unsure.
- 4.2 To assist United Learning sites in evaluating compliance, a '*Client Aide Memoir*' is available in the [A-Z section](#) of United Hub's H&S pages.

5. Notifiable Projects

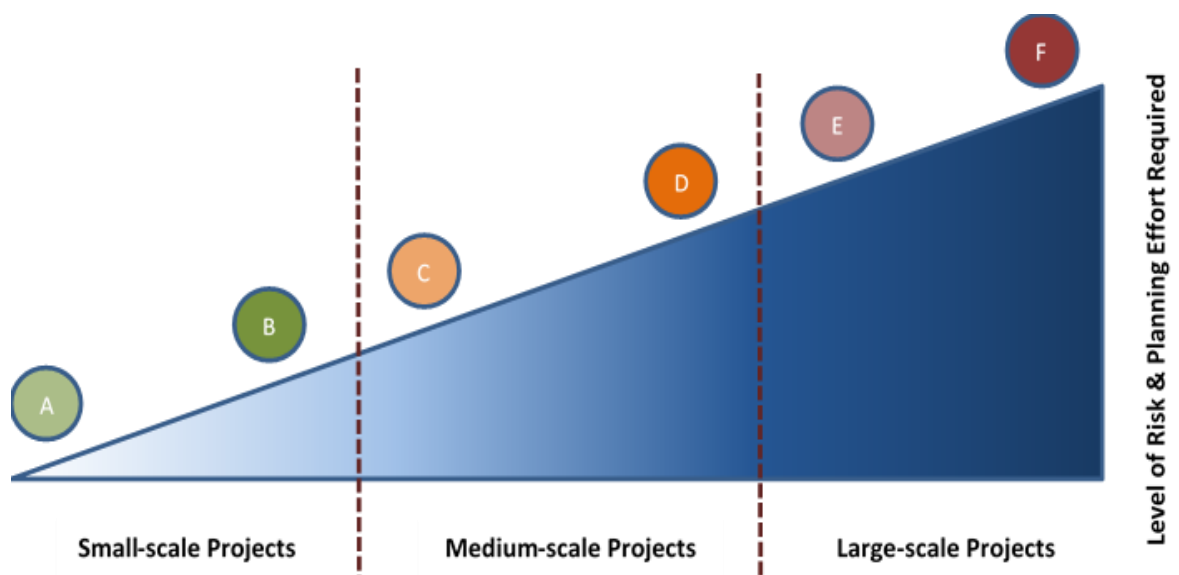
- 5.1 Construction projects must be reported to HSE where the project is anticipated to:

- a) Last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project; or
- b) Exceed 500 person days

- 5.2 Notification must be made by the school lead for construction projects to their Group Estates Manager, at least two weeks before the project is due to begin. Schools must not notify HSE directly of any construction projects.
- 5.3 Where a construction project starts out non-notifiable but the scope of works changes such that it becomes notifiable, schools must notify their Group Estates Manager immediately that this becomes apparent.
- 5.4 Whilst not all construction projects require notification, all construction activities must follow the requirements of the CDM Regulations. The full Approved Code of Practice (ACOP) to the Regulations can be found in the [A-Z section](#) of the Health and Safety pages on United Hub.
- 5.5 Further support and advice on CDM and Notification Requirements is available from the Estates Team and schools are strongly advised to work with their Group Estates Manager where the project is likely to be notifiable, or when multiple contractors are to be appointed.
- 5.6 To assist, A 'Construction Projects Management Process Flow' diagram is available in the [A-Z section](#) of the Health and Safety pages on United Hub.

6. Construction Project Planning

- 6.1 The level of planning and assessment required for each project will vary and it is for the nominated CPL to determine the level of effort required. The 'wedge principle' may be used as a guide when reaching this decision and this is shown below.



6.2 Small-scale Projects

- 6.2.1 Examples of small-scale projects include painting a wall or installing a whiteboard (A), or stage lighting-rig maintenance (B). Such tasks are relatively low-risk and of short duration and as a result the paperwork required to manage these risks should be minimal. The [pre-construction information](#) should be consulted, but a formal [construction phase plan](#) may not be necessary.

- 6.2.2 As for all CDM tasks, the person carrying out the task needs to be competent. A key element of the ‘client’ role is to ensure that any contractors appointed, whether this is an in-house team or external contractor, has the necessary skills, knowledge, and experience to be able to work safely.
- 6.2.3 Small-scale projects that are performed in-house will commonly only require general risk assessment and method statements, many of which may be generic i.e. they refer to tasks commonly carried out on site and which are already adequately assessed and suitably controlled. Where this is the case, additional paperwork is not required.
- 6.2.4 If external contractors are used, they may need formal briefing/project documentation as they may not be familiar with the site and they must be provided with information on welfare arrangements, emergency procedures etc. It is expected in turn that they would have appropriate risk assessments and method statements to carry out the work safely and CPLs should satisfy themselves that this is the case. Refer to the [‘Group Contractor Management Policy’](#) for more information on this area.
- 6.2.5 Tasks such as maintenance of stage lighting will potentially carry more risk as it will most likely involve, working at height, working with electricity etc. That’s why it is located further along the scale of risk on the junction between small and medium-scale projects. This is the sort of project that would require reference to existing wiring diagrams, asbestos survey, and a lighting design specification. This information will need to be shared with the principal contractor/contractor (if employed) who should then produce a [Construction Phase Plan](#), which is shared with all parties to ensure work is undertaken safely.
- 6.2.6 As a general rule, the more complex the task, the greater the planning required. The majority of small-scale projects only need basic documentation. The focus should be on managing the risks associated with the project, rather than generating paperwork.
- 6.2.7 The ‘Construction Phase Plan Template’ in the [A-Z section](#) of the Health and Safety pages on United Hub may be useful in helping CPLs manage small-scale projects appropriately.
- 6.3 **Medium-scale Projects**
- 6.3.1 Examples of medium-scale projects would include bitumen sealing flat roof leaks (C), or the erection of temporary structures/marqueses for events such as a carnival or student ball (D).
- 6.3.2 Although one of the principles of CDM is to avoid generating excessive paperwork, a medium sized project is likely to carry a significant element of construction risk and therefore will require an appropriate level of planning.
- 6.3.3 In such cases, the key to ensuring a safe build is to get all parties to contribute to the design process. This may mean effectively having a design team rather than a single person being responsible for the design. Once all the design requirements have been agreed, the contractors or in house team should produce a [construction phase plan](#).
- 6.3.4 In basic terms if United Learning are the client only, then the main duty will be to ensure that there are suitable arrangements in place for any construction required to take place safely. If United Learning is the principal contractor/contractor then the main duty will be to actually plan, manage, and monitor the project.
- 6.3.5 Situations will arise where the risk level sits somewhere between the upper and lower boundaries of medium-scale projects.. Ultimately, the decision on the level of work required for each project rests with

the CPL, who if unsure, should adopt a precautionary approach and apply the higher degree of control for the project under consideration.

6.3.6 Where the CPL feels that the project is likely to be located closer to 'project D' than 'project C', they are advised to contact their Group Estates Manager to discuss the level of planning required.

6.3.7 The 'Construction Phase Plan Template' in the [A-Z section](#) of the Health and Safety pages on United Hub may be useful in helping CPLs manage medium-scale projects appropriately.

6.4 Large-scale Projects

6.4.1 Examples of large-scale projects would include building/wing refurbishment (E), or the construction of a new building/school (F).

6.4.2 The nature of these projects is such that the health and safety risks increase considerably and therefore a substantial amount of effort will be required to ensure that the project can be undertaken safely.

6.4.3 It is likely that projects of this scale will involve more than one contractor and therefore the client is required to make formal written appointments of both Principal Designer (PD) and Principal Contractor (PC). The Principal Designer is involved in leading the planning, managing and monitoring the project from conception up to the start of construction. Depending on the project, this role may well extend in to the construction phase, if the Principal Contractor requires further information.

6.4.4 If the Client does not appoint a Principal Designer, these duties default to the Client.

6.4.5 Likewise with the Principal Designer the Client is required to formally appoint a Principal Contractor, and the same rules apply in terms of if no appointment is made the duty defaults to the Client. As the Principal Contractor role is essentially about safely managing the construction phase of the project it is almost certain that this role will need to be given to an external contractor.

6.4.6 School's must consult their Group Estates Manager at the conceptual stage for all projects that will potentially fall into the category of 'large-scale projects'.

7. Pre-Construction Information

7.1 Pre-construction information refers to the health and safety information needed by:

- Designers and contractors who are bidding for work on the project, or who have already been appointed (including internal staff), to enable them to carry out their duties
- Principal designers and principal contractors in planning, managing, monitoring, and coordinating the work of the project (where it is necessary to appoint these roles)

7.2 This information forms the basis for the [construction phase plan](#) which may also inform or contribute to the [health and safety file](#).

7.3 Pre-construction information can be generally defined as information about a project that is already in a client's possession or is readily obtainable, e.g. asbestos register, O&M manuals, wiring schematics. It should be consulted before any construction work is carried out, regardless of whether or not a principal designer or principal contractor is required.

7.4 Further information on Pre-construction information is available in Appendix 2 of the CDM ACOP, available in the [A-Z section](#) of the Health and Safety pages on United Hub.

8. Construction Phase Plan

- 8.1 A construction phase plan is a document that must detail:
- a) The health arrangements for the construction phase
 - b) Site rules
 - c) Details of the specific measures employed where work falls within one or more of the categories defined in Schedule 3 to the CDM Regulations (unlikely in most schools)
- 8.2 The construction phase plan is the basis for communicating health and safety arrangements to all those involved in the construction phase.
- 8.3 The client must ensure that a construction phase plan is drawn up before the construction phase begins and it must be proportionate to the size and nature of the work to be carried out.
- 8.4 For small-scale works, such as painting a wall, or hanging a door (which still qualify as construction works) it would clearly not be practicable to spend more time drawing up documentation than it would take to complete the task. In such circumstances, the activities risk assessment and associated safe systems of work will suffice.
- 8.5 It is for each school's nominated CPL to determine where each project sits on the scale of risk and what level of documentation is required as a result of this. This decision should be documented.
- 8.6 The 'Construction Phase Plan Template' in the [A-Z section](#) of the Health and Safety pages on United Hub may be useful to CPLs when planning projects.
- 8.7 Further information on the contents of a construction phase plan is available in Appendix 3 of the CDM ACOP, available in the [A-Z section](#) of the Health and Safety pages on United Hub.

9. Health and Safety File

- 9.1 Where a construction project utilises more than one contractor, a health and safety file must be produced. It is the responsibility of the client to ensure that the principal designer produces this file. The purpose of this information is to provide the client with information that anyone carrying out subsequent construction work would need to know in order to plan and carry out their work safely.
- 9.2 The majority of construction projects will need to make reference to an existing health and safety file to enable an accurate construction phase plan to be drawn up.
- 9.3 Should a school dispose of an asset or part of asset to which there is a health and safety file in existence, this information must be passed on to the new owner.
- 9.4 Further information on the health and safety file is available in Appendix 4 of the CDM ACOP, available in the [A-Z section](#) of the Health and Safety pages on United Hub.

10. Permit to Work Systems

- 10.1 A permit to work system is a formal safety control document that is designed to prevent injury or damage to persons or premises when high hazard work is undertaken. The decision to employ a permit to work system must form part of the risk assessment for the work being considered.
- 10.2 The Group's insurers require that a permit to work system be employed whenever hot works are carried out and a template form can be found in the [A-Z section](#) of United Hub's H&S pages.

- 10.3 Any capital works with a value greater than £250k must be notified to Zurich at the planning stage. This will normally be carried out by the relevant Group Estates Manager.
- 10.4 Any planned works that will involve hot works must be notified by the Site's construction projects lead to Zurich at least two weeks before the works are due to take place and must use the Zurich Hot Works Permit.
- 10.5 Where a contractor has their own hot works permit process in place, there is no requirement to also use the Zurich permit provided that the contractor's system provides an equivalent degree of control. The selection of the contractor, however, must be subject to the requirements of the [Group Contractor Management Policy](#).
- 10.6 Any incidental hot works, e.g. emergency plumbing repairs, can be carried out without prior notification to Zurich provided that the Zurich Hot Works Permit is used. The Group Estates Manager must be notified of these planned works by email and provided with a copy of the permit to work, completed as much as it can be, prior to works commencing. Provided this information is supplied there is no need to wait for approval from the Group Estates Manager before the work is carried out.
- 10.7 Should a loss-event occur (such as a fire) where Paragraphs 10.3-10.6 of this Policy have not been followed, the ability for the Group to claim for the full value of remedial works required is likely to be impaired and it will be for the school to make up any shortfall from their local budget.
- 10.8 All Hot works permits must be retained for a period of 12 months.
- 10.9 Other circumstances when a permit to work system are likely to be required include,
- Work on electrical circuits or equipment that cannot be isolated locally
 - Work in confined spaces
 - Roof work
- 10.10 It may be necessary to implement a permit to work system when the work is being carried out by a contractor and this should be discussed during any works planning meetings.
- 10.11 A permit to work is unlikely to be required where the work is on simple systems with dedicated local isolation, and presents minimal risk, or has no secondary impact on other users. However, a risk assessment and method statements should still be provided and any necessary control measures put in place before works commence.

11. Document Retention

- 11.1 Records pertaining to the planning and organisation of maintenance and refurbishment tasks must be kept for three years, except where they are linked to an accident or incident in which case they must be kept for the life of the accident record. Appending documents of this nature to the [ARMS](#) record will remove the need to keep large volumes of documentation on Site.
- 11.2 Records relating to the planning and organisation of capital works must be retained for the life of the asset.

12. Training

- 12.1 There is no requirement for specific training to be provided to CPLs, however, at Sites where there is likely to be a significant number of projects undertaken, a project management qualification may be helpful.

- 12.2 There are courses on the market covering Client and Principal Designer/Contractor roles specifically and it may be beneficial for the CPL to attend one of these courses.
- 12.3 Where works are to be undertaken 'in-house' the CPL is responsible for ensuring the competencies of those involved are relevant to the tasks to be performed.

13. Summary of Requirements

- All 'construction' work to be carried out in line with the principles detailed in this Policy
- Projects which are potentially notifiable to be discussed with school's Group Estates Manager
- A Construction Phase Plan to be drawn up for all 'Construction' activities
- Permit to work systems must be used for any construction projects involving hot work and potentially for other hazardous situations
- Zurich must be notified of any capital projects over £250k, or for planned hot works. Group Estates Managers must be notified in advance of incidental hot works and supplied with a copy of the permit to work for this activity
- Maintenance and refurbishment planning and organisation records are to be retained for at least three years
- Records relating to the planning and organisation of capital works are to be retained for the life of the asset.

14. Further Information

- 14.1 For additional information on asbestos management, refer to the [HSE website](#) and [A-Z section](#) of the Health and Safety pages on United Hub.

15. Local Arrangements

At **Glebe Primary School**, **Steven Williams** is the nominated construction projects lead.


Records of historical construction projects can be found **under the school Managed Projects file**.

The permit to work system is managed by Steven Williams and permit to work records can be found **under the School Managed Projects file/ Contractor file**

16. Declaration of Adoption

This Policy has been reviewed by the senior leadership team and has been formally adopted.

Head
Teacher



Mrs. Karen Crutchfield

12/11/24

Governor for
Health and Safety

Mr. James Eaton



06/11/24



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