

Health and Safety Unit

Contractor Health and Safety Management Policy

This policy is a sub-policy of the main University Health and Safety Policy Statement

Introduction

The University of East London has a duty of care under the Health and Safety at Work etc. Act 1974 to its staff, students and others who may be put at risk by its activities or premises, including contractors undertaking work on its premises.

UEL acknowledges and accepts its statutory responsibilities to ensure, so far as is reasonably practicable, the health, safety and welfare of all who are employed or contracted to work within our premises.

As a controller of premises, UEL has a statutory duty to ensure the health, safety and welfare of all its employees, students, visitors and guests. Part of this duty is to take necessary actions to ensure UEL activities do not endanger others, including contractors, who may undertake work on or visit any UEL premises.

This policy aims to ensure the health, safety and welfare of contractors working on UEL premises and those affected by their work.

UEL staff who manage contractors who fall within the scope of this policy will be expected to conform to the provisions contained within it. Any proposal to deviate from this policy must be discussed with the Health and Safety Unit and only agreed where a suitable alternative is available to ensure the health, safety and welfare of contractors and those affected by their work. Observation of this policy does not in any way relieve contractors of their own statutory and contractual obligations.

All Schools, Departments and Services must consult UEL's Facilities Services and seek prior agreement for any work that may affect the fabric of their buildings, any other contractors who may be on site and/or any fixed systems e.g. the electrical or water supply.

UEL's Facilities Services, and any other Service which is initiating works, for example IT, must ensure that Schools/Departments/Services are consulted and provided with information in

advance regarding any refurbishment or maintenance work in their areas that is to be undertaken by contractors' or their own staff. In exceptional circumstances, such as emergency situations, it may not be possible to comply in full with the usual protocols. Wherever possible the Health and Safety Unit (HSU) should be informed when this is going to be the case.

For work that they commission themselves that falls into an appropriate category (see Scope below), Schools, Departments and Services are responsible for ensuring that contractors are provided with the relevant pre-construction information; in particular information they will need for their inductions and to carry out their risk assessments, and any other relevant information they will need to work safely.

Scope

Contractors to whom this policy must be applied are those who fall into the following categories:

1. Any contractor carrying out Construction or Engineering work
 - Construction work includes new build, maintenance, refurbishment and demolition;
 - Engineering work includes installation, commissioning and maintenance of machinery, plant and their associated systems such as pipes and ductwork.
2. Any contractor who for any reason will be involved in:
 - Accessing or working on roofs;
 - Any other work at height;
 - High voltage electrical work;
 - Work in a confined space;
 - Accessing or working in excavations;
 - Working in areas where asbestos might be disturbed;
 - Work on lifts/in lift shafts;
 - Window cleaning.
3. IT installation or removal work

Client duties

Clients such as UEL have an explicit statutory duty to ensure that:

- A Principal Contractor and a Principal Designer are appointed where there is, or will be, more than one contractor involved in the work;
- Contractors and designers are competent;
- UEL's own activities are coordinated with those of the contractor;

- Lead in times are sufficient for contractors to properly plan, resource and organize their work;
- Contractors and designers are supplied with adequate Pre-Construction Information;
- The Main or Principal Contractor produces a suitable Construction Phase Health and Safety Plan;
- The Principal Designer (where appointed) produces a Health and Safety File;
- The arrangements for managing and resourcing projects are at all times adequate to enable the work to be carried out safely.

Sign in and other contractor control arrangements

Where there is a sole trader or single (main) contractor

Where a sole trader or a single contractor¹ is the only company engaged on a particular piece of work, each operative must obtain a relevant pass and ID from the campus reception. Before travelling to the worksite they must check in with whoever engaged them. This person will often be the UEL Contract Supervisor for the job. If appropriate, the contractor must ensure they have a Contractor Access Approval Form in place, which will be issued by UEL's Contract Supervisor, before entering the area where they will be working.

Where there is more than one contractor

The duly appointed Principal Contractor's representative will be responsible for arranging initial access to the site with the Contract Supervisor. It is expected that the PC will fulfill all the roles and duties ascribed to this position by the Construction (Design and Management) Regulations 2015. This will involve operating a daily signing in book on site.

Sites with more than one work area or location

Where a project involves more than one work site, for example on different floors or in multiple buildings, one of these locations must be designated as the signing in point and operatives must sign in and out in that designated location irrespective of where they are actually working.

Any contractor who is found to have attended site and started work, including preparatory work, without complying with the above protocols will risk being ejected from site. The University will also reserve the right not to engage such a contractor again for a period of its choosing, or at all.

Lead in times

¹ Often referred to as "Main Contractor"

Those who are responsible for commissioning projects should ensure that there is sufficient lead in time allowed for the Main or Principal Contractor and other contractors to fulfil their statutory health and safety obligations to properly plan and prepare for the work.

Responsibilities

Heads of School/Department, Directors of Services

To ensure that:

- Contractors are selected from the approved list, or, if not, that there is a mechanism in place for properly vetting contractors and checking that they are suitably skilled and competent to carry out the work (if necessary HSU can assist with this). The UEL [Contractor Vetting Form](#) should be used;
- That each contract is under the control of a competent Contract Supervisor (CS) ;
- That if the CS is absent, a suitable deputy has been appointed;
- The arrangements for managing and resourcing projects are at all times adequate to enable the project to be carried out safely;
- All staff occupying new or refurbished space are properly inducted and made aware of any new arrangements for health and safety, fire and welfare facilities;
- Review the fire marshal, first aid and safety coordinator cover and ensure it is still suitable and sufficient, making additional provisions where required.

Contract Supervisors

This role will normally be undertaken by the Project Manager or other person appointed to the role by the relevant Head of School or Department, or Director of Service.

Contract Supervisors will:

- Ensure that Main and Principal Contractors have filled out and returned the UEL Contractor Vetting Form and that their employees are suitably qualified and skilled to carry out the relevant work. In deciding suitability and competence the CS will consider:
 - i. Qualifications and experience
 - ii. Membership of professional bodies/trade associations
 - iii. Membership of a pre-qualification scheme
 - iv. References/testimonials from previous clients
 - v. Work previously undertaken for UEL (if any)
 - vi. Examples of risk assessments/method statements (RAMS)
 - vii. Training records

- Ensure that each Principal Contractor has mechanisms in place for checking sub-contractor competence;
- Arrange and attend pre-start meetings to confirm safety arrangements and standards;
- Issue Contractor Access Approval forms;
- Ensure that Main and Principal Contractors have suitable insurance cover (Public and Employers' Liability);
- Ensure that site inductions are carried out for all contractor personnel, and that records of this are kept;
- Together with the Main or Principal Contractor, ensure contractors have all relevant safety documentation on site before they commence work. This may include:
 - i. Risk assessments
 - ii. CoSHH assessments
 - iii. Method statements
 - iv. Access Approval forms
 - v. Permits to Work

Particular attention will need to be paid to the suitability and sufficiency of RAMS for work carried out after handover and when snagging work is taking place in areas that have been re-occupied;

- Operate any necessary permit to work (PTW) system in liaison with the UEL maintenance and/or projects team who will normally issue the PTW;
- Ensure that Main and Principal Contractors draw up a set of site rules and that they bring them to the attention of everyone on site and enforce them;
- Ensure contractors receive any information from UEL which they may need in order to work safely. For example:
 - i. Information on the presence of asbestos
 - ii. Details of occupancy where, or adjacent to where, they will be working
- Accompany the Main or Principal Contractor when they carry out formal fortnightly site inspections;
- Ensure that copies of reports of the above are sent to the Health and Safety Unit;
- Ensure that relevant² members of UEL staff are informed in advance of the contractor's pending activities;
- Ensure that arrangements are in place for the proper disposal of waste;
- Carry out final inspections to ensure that the site/workspace is safe to hand back;
- Where appropriate check that effective fire stopping has been provided/reinstated;
- Check that any electrical or mechanical systems taken out of use during the works have been recommissioned properly;
- Monitor entries in the site accident book.

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² This would typically be Deans/Directors/local managers/supervisors

- To advise and assist with all aspects of health and safety relating to contractor engagement and activities;
- Periodically accompany CSs and Contractors on-site inspections;
- When requested assist CSs and others in the scrutiny of contractors' health and safety paperwork, which must be provided to the CS, and approved, prior to work commencing.

Principal Contractors

Principal Contractors must:

- Ensure that, if they require one, they have a Contractor Access Approval form in place before coming onto site;
- Ensure that a Construction Phase Plan is in place before construction work begins;
- Inform the CS/Project Manager of their sub-contracting arrangements;
- Ensure that all sub-contractor employees receive a site induction and sign to that effect;
- Ensure their own competency and that of their sub-contractors;
- Plan, manage and monitor the work to ensure it is conducted safely;
- Where the duration of the work requires it, carry out formal fortnightly site inspections using the UEL site inspection form, record them and send a copy to HSU;
- Inform the CS of any substantial changes they propose to make to their RAMS or Safe System of Work;
- Ensure all RAMS are site specific from the outset and that they have been revisited and adapted to take into consideration the risks to staff, students and others in occupied areas during snagging ;
- Inform the CS of all accidents, near misses and incidences of ill-health that occur during the contract;
- Without exception, have a supervisor on site at all times;
- Arrange for the proper disposal of waste;
- Provide adequate first aid cover and first aid kits for those on site;
- Provide an accident book to site and make entries appropriately;
- Keep inspection records for safety-critical equipment such as harnesses, scaffolding, lifting equipment and towers.

Principal Designers

Principal Designers must:

- Plan, manage and monitor the pre-construction phase and coordinate matters relating to health and safety;
- Assist the client in the provision of the pre-construction information;

- Check the skills, knowledge , experience and organizational capability of any designers they appoint;
- Ensure that foreseeable risks to health and safety are identified;
- Make appropriate checks to ensure designers are dealing with design risks appropriately;
- Assess the adequacy of the pre-construction information to identify any gaps;
- Advise the client on how the gaps can be filled;
- Assist the principal contractor in preparing the construction phase plan by providing relevant information;
- Produce a health and safety file.

Contractors

Contractors must:

- Abide by the terms and protocols contained in this policy;
- At all times work to the requirements of their own risk assessments and method statements, and adapt them appropriately if they return to carry out snagging operations after the initial contract has been completed;
- Sign in and out on arrival and departure;
- Ensure their own competency and that of their sub-contractors;
- Plan, manage and monitor their own work and that of their sub-contractors to ensure it is carried out safely;
- Keep to the campus speed limit;
- Ensure they have received a site induction before they start work;
- Inform the Principal Contractor of their sub-contracting arrangements;
- Inform the Principal Contractor of all accidents, near misses and incidences of ill-health that happen to their employees during the project;
- Not enter any student residence without permission;
- Ensure work areas remain safe at all times;
- Co-operate with site inspections, meetings and reviews;
- Ensure all materials and tools are stored safely;
- Ensure that access to hazardous areas is restricted;
- Ensure that on completion all equipment, materials and waste are removed from UEL premises and that the former work area is left clean and tidy.

Site Inspections

When carrying out fortnightly site inspections the [UEL Site Inspection Form](#) must be used.

Examples of topics which are included:

- Are all relevant RAMS held on site? (all contractors).
- Are dust and noise being controlled?
- Personal Protective Equipment observance
- Is housekeeping adequate inside and outside the site?
- Is site secure and segregated? (Where possible).
- Are safe systems of work being followed
- Are scaffolding and towers being managed safely and inspected, and are the inspections being recorded, in accordance with the requirements of the Work at Height Regulations?
- Is waste being disposed of correctly?

Sanctions for poor health and safety performance

Contractors who commit a serious health and safety breach, or who repeatedly commit breaches of any degree of severity, particularly after this has been pointed out to them, must be made aware that they will suffer a detriment for this. This will normally take the form of being temporarily or permanently excluded from working for UEL. Project management staff in particular will be expected to feedback relevant information concerning health and safety performance to the HSU.

Some examples of what would constitute a serious breach are:

- Any act or omission that could have, or did, result in a fatal or serious injury incident;
- Repetition of any actions that have already been pointed out as unacceptable;
- Breaches of gas or electrical safety;
- Unsafe working at height;
- Action that might have, or did, expose any person or persons to asbestos;
- Serious exposure to dangerous substances;
- Repeated breaches of site safety rules.
- Breaches of waste disposal regulations

Where health and safety transgressions have taken place the decision as to what constitutes an appropriate sanction, including a permanent ban, will be taken by the Head of Health and Safety in conjunction with the Director of Estates and Facilities. If there is any disagreement with a decision reached in this area it will be passed to an appropriate member of the University Executive Board for a final decision. All relevant information and decisions taken in this context will be fed back to the office of the Head of Procurement for appropriate action.

Protection of students, staff and visitors.

Contractors must make sure that the work they undertake on UEL premises does not at any time pose a health and safety risk to students, staff or visitors. Particular attention to this requirement will be necessary when work is taking place in occupied areas. Contractor risk assessments must make explicit reference to this. If they do not they should be returned as unsatisfactory.

Fire and emergency arrangements

Contractors must ensure that at all times they maintain an adequate means of escape for the occupants of areas close to or affected by the work site. Nothing must be allowed to close off or obstruct these established escape routes.

If it is necessary to block or obstruct an existing route or routes, adequate alternative escape routes must be established and appropriately signed before the existing route or routes are suspended from operation. The new routes must be vigorously maintained until the old ones can be reinstated.

There must also be an adequate fire and emergency escape plan for the site itself. This should be incorporated into the construction phase health and safety plan. Alternatively it could be a stand-alone document.

Permits to Work

Permits to Work (PTWs) should be used where appropriate. They should not be used as an access permit. ([Link to Permit to Work Policy](#))

A [Contractor Access Approval Form](#) is available to be used to confer and prove right of access to a particular location.

A PTW system is a formal written system used to control certain types of activities, tasks, processes or other work that involves certain specific hazards. A PTW system should be a documented procedure that authorizes certain competent people to carry out specific work within a specified time frame.

A PTW system will include:

- Details of the work to be done
- The required precautions and emergency arrangements
- The people involved
- Any limits on the task or equipment which are necessary to carry out the work safely
- Should be displayed at the work location

Some of the information mentioned above may be contained in the risk assessment and/or the method statement for the job and these can be attached to the permit instead of duplicating information on it.

Hand back procedure – should confirm whether the works for which the permit was issued have been completed, stopped or temporarily suspended.

PTW systems should not be applied to all work activities just as a matter of routine. Experience shows that their overall effectiveness is diminished thereby.

They are not normally required for controlling general visitors to site or routine maintenance tasks in non-hazardous areas.

PTWs should normally be issued by the principal/main contractor. However where required for work being carried out by a sole contractor they will then be issued by a member of UEL staff. This will normally be the CS responsible for the work. The person who issues the PTW must be competent to do so, must understand the nature of the work covered by the permit and must have reviewed the relevant RAMS.

Additional Requirements for the duration of the Covid-19 pandemic

Only approved contractors should be coming on site

Whoever is engaging them manage them. This will be either Estates & Facilities, the School or the Service

Once it is considered that the risk assessment/method statement is suitable and sufficient, it and the Construction Phase Plan (if applicable) should be cleared with the Health and Safety Unit before work commences.

Estates and Facilities must be informed in advance

Wherever possible Contractors must be supervised for compliance.

Contractors are expected to provide their own First Aider who is trained according to the current HSE guidelines. They must be present onsite whenever work is being carried out. In most cases this will need to be a 3-day trained (FAW) first aider. An EFAW (1-day trained) first aider may be acceptable if the work is low risk.

There must be a Covid-19 section in the RA. In particular this must detail:

- information describing how they will comply with government guidance on social distancing and confirming that they know the criteria (hierarchy) to be applied if they cannot;

- how they intend to ensure that their operatives and sub-contractors follow all the required measures. They must have a supervisor or team leader on site all or most of the time.
- If they are working in teams, maintaining the integrity of those teams and not mixing between them.
- that they will work only in their designated areas
- All PPE and other waste and unused materials, must be taken off campus and disposed of correctly.

- **In addition to the usual incident reporting all contractors must report to UEL if any operatives show Covid like symptoms whilst on site or at any time within 14 days of being on site.**

The School or Service engaging the contractor will need to share with them information about the Covid-19 related safety arrangements on our campuses such as limitations on the use of lifts, wearing of masks etc.

Wherever possible, arrangements should be made for them to use one set of welfare facilities such as toilets in each building. If possible no students or UEL staff should use the welfare facilities that the contractors are using until they have left site and they have been disinfected.

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