



Document Title:	Construction (Design & Management) Policy
Audience:	All staff
Document Date:	February 2021
Document Revision Date:	October 2025
Document Location:	N Drive: HR/All Users/Policies and Procedures PeopleHR / Company Documents

1. Introduction

The Construction (Design & Management) Regulations 2015 (CDM) applies to all construction work being carried out. i.e. construction, alteration, conversion, fitting out, commissioning, renovation, repair, up-keep, redecoration or other maintenance (including cleaning which involves the use of water or an abrasive at high pressure, or the use of corrosive or toxic substances), decommissioning, demolition or dismantling of structures.

The Regulations are aimed at improving the overall management and coordination of health, safety and welfare throughout all stages of a construction project to reduce the large number of serious and fatal accidents, and cases of ill health which happen every year in the construction sector.

As a responsible employer Royal Holloway Students' Union (RHSU) is committed to the provision of an environment in which we reduce the risk of injury as far as reasonably practicable from any of the activities contained within the Regulations.

The purpose of this Policy is to ensure that the delegated individuals are cognisant of their duties under CDM, and together with the training provided, enable comprehensive management action to be taken to manage key relationships and control potential hazards and risks at departmental levels.

Who are the CDM Duty Holders?

The legislative requirements of CDM incorporates the roles and responsibilities of each duty holder, who are accountable for safety on the construction site / project, namely:

- Clients – organisation or individuals for whom a project is undertaken for commercial benefit
- Domestic Clients – persons for whom a project is undertaken on their home, non-commercial
- Principal Designer – organisation or individual appointed by the client on projects involving more than one contractor
- Designers – organisation or individual who as part of a business, prepare or modify designs for a building, product or system relating to construction work
- Principal contractor – organisation appointed by the client to coordinate the construction phase of the project where multiple contractors are engaged
- Contractors – those who carry out the actual construction work, can be individuals or organisations
- Workers – those working for or under the control of contractors

The key responsibilities for each duty holder are laid down in a series of Industry Guidance documents, published by HSE, which are available to download from

<https://www.hse.gov.uk/construction/cdm/2015/summary.htm>

An organisation or individual can carry out the role of more than one duty holder, provided they have the skills, knowledge, experience and the organisational capability to conduct these roles in a way that secures health and safety.

RHSU acknowledges that under CDM it holds the duties of Client in relation to works instructed, and Contractor in relation to works undertaken for itself or 3rd parties.

Where does CDM apply?

CDM must be applied to every construction project regardless of size or timescale. Where a project is expected to last longer than 30 days and have more than 20 workers engaged simultaneously at any point or exceed 500 person days of construction work the Client must notify the Health & Safety Executive (HSE) and appoint a Principal Designer and a Principal Contractor. The requirements of

CDM apply whether or not a project is notifiable or has health and safety implications for any organisation.

All outdoor events which require temporary structures (of any kind) are covered by CDM, and will require the appointment of a Principal Designer and Principal Contractor.

2. Employer Responsibilities

RHSU has responsibilities as the Client and the Contractor under CDM and these are identified as;

Client Duties:

- i. Make suitable arrangements for managing a project (allocation of sufficient time and resources), including making sure other duty holders are appointed as appropriate and providing pre-construction information to every designer and contractor appointed.
- ii. Where there is more than one contractor, or it is foreseeable that more than one contractor will be working on a project at any time a Principal Designer and Principal Contractor must be appointed in writing.
- iii. Where a project is to last longer than 30 days and have more than 20 workers engaged simultaneously at any point in the project or exceeds 500 person days of construction written notice must be provided to HSE as soon as practicable before the construction phase begins.
- iv. Provision of information and instruction must be comprehensive and provided to other duty holders as soon as is practicable, and mechanisms for reporting any health and safety risks are in place to mitigate endangerment for all persons. Where the project is notifiable all pre-construction information and health and safety information relating to the project will be shared promptly to the appointed principals.

Contractor Duties:

- i. Construction work will not be undertaken in relation to a project unless the Contractor is satisfied that the Client is aware of the duties owed to the Client by the Contractor under the Regulations. Where the Client is itself separation of duties must be identified with named individuals holding each role.
- ii. Where RHSU is one of a number of contractors engaged on a project, RHSU will comply with any direction given by the Principal Contractor or Principal Designer.
- iii. RHSU will plan, manage and monitor all construction work undertaken by RHSU as the contractor or under the control of RHSU as the contractor without risk to health and safety.
- iv. RHSU will ensure that any sub-contractor appointed or engaged is informed of the minimum amount of time which will be allowed to them for planning and preparation prior to commencing construction work.
- v. RHSU will provide every worker carrying out construction work under RHSU control with any information and training which is needed for the particular work to be undertaken safely and without risk to health, including, suitable site induction, where not provided by the principal contractor.
- vi. RHSU will provide information on the risks to health and safety identified via risk assessment, or arising out of the conduct of another contractor, site rules, procedures to be followed in the event of imminent or serious danger, and the identity of the persons nominated to implement these procedures to their workers.

3. Line Manager Responsibilities

Managers will take appropriate measures as are necessary to ensure that all construction work is planned, organised and undertaken by competent persons. These measures include, but are not exclusive:

- i. Liaise with RHUL Estates to identify whether the project or works required are contained within the Memorandum of Cooperation, or appropriate appendix, and instruct accordingly.
- ii. Planned projects are evaluated, should any form of construction work be required a full risk assessment of the project is undertaken, which identifies whether RHSU is the Client, Contractor or both.
- iii. Where RHSU has been identified as the Client a full project plan must be developed and the organisation's Governance processes complied with, and once approved a pre-construction plans developed.
- iv. Where RHSU has been identified as the Contractor the line manager is expected to liaise with the Client or their appointed Principal Contractor, and comply with the information / instruction shared in accordance with the duties of the contractor in the regulations
- v. Where RHSU has been identified as both Client and Contractor the line manager must identify the two named individuals who will take the project forward and ensure compliance of the duty holders in accordance with the regulations.
- vi. Where sub-contractors or workers are engaged they must be competent for the tasks requested, with all Gas or Electrical work completed by a certified engineer, and all appropriate risk assessments and method statements checked prior to commencing work.

4. Employee Responsibilities

All employees have a duty to take reasonable steps to ensure that they do not place themselves or others at risk of harm. Where construction work is requested employees are expected to cooperate fully in complying with any procedures that may be introduced as a measure to protect the safety and well-being of our staff and visitors (including sub-contractors).

It is the responsibility of all employees to be aware of the potential risks in the area where they are working, comply with instruction and follow safe working practices at all times, and to ensure that PPE provided is used.

5. Training

CDM Regulations are complex and require significant knowledge and situational experience to navigate effectively. RHSU employs individuals who have the appropriate qualifications, knowledge and expertise to support colleagues and line managers as and when required.

Individuals who are required to manage construction projects on a regular basis will be requested to complete appropriate training and achieve certification on CDM. There will also be opportunity for situational experience to be gained via shadowing, secondment or supported project management.

RHSU will provide information and instruction on the responsibilities of duty holders to all individuals engaged in construction work, along with guidance and training on risk assessments and method statements.

Employed workers will be provided with information and training, as appropriate to the task, and in accordance with other policy and procedures documents.

6. Monitoring

The implementation of this Policy will be monitored at departmental level with any accidents, incidents or near misses being recorded and reported centrally to the Health & Safety Committee.

All notifiable projects will be recorded, documentation archived for future reference, and retained for 5 years.