

Construction (Design and Management) Regulations Policy

Category	Asset Management
Lead	Director of Asset Management
Committee / Approver	Service Delivery Sub Committee
Action	Review & Approve
Review Date	August 2026
Review Due	August 2029
Purpose	Set out our responsibilities as a client under CMD 2015
Internal/External	External

Introduction

This policy describes how Angus Housing Association will meet its duties under the Construction (Design and Management) Regulations 2015 when commissioning, procuring and managing construction-related work.

The main changes are:

- All construction projects, including those for domestic clients (Factoring), fall under the regulations.
- CDM Co-ordinator is removed.
- Principal Designer is a new role with specific duties.
- All works involving more than one contractor will require the appointment of a Principal Designer and Principal Contractor. For the purposes of this policy when Angus Housing Association appoint one contractor to carry out construction works, the Associations will require confirmation that that one contractor is the only contractor in full control of all workers on that project unless otherwise advised.
- Notification to the Health & Safety Executive is changed to when the duration of the construction work lasts longer than 30 working days AND there will be more than 20 workers at any time OR more than 500 person-days.
- All persons with a role under the regulations cannot delegate the responsibility of that role to another person or agency, duties can be assisted but not transferred.

Policy Aims and Objectives

Angus Housing Association is committed to ensuring that all construction, refurbishment, planned maintenance, cyclical maintenance and building-related projects are undertaken in accordance with the Construction (Design and Management) Regulations 2015 (CDM 2015).

This policy sets out the Association's responsibilities as a Client under CDM 2015 and establishes the framework for managing health, safety and welfare throughout the lifecycle of construction projects. The Association recognises that effective planning, communication, co-ordination and risk management are essential to protecting employees, tenants, contractors, visitors and members of the public from construction-related risks.

Principles

This policy applies to all construction work commissioned by the Association, including but not limited to:

- New build developments.
- Planned and cyclical maintenance projects.
- Component replacement programmes.
- Major repairs and refurbishment work.
- Energy efficiency and decarbonisation projects.
- Demolition works.
- Structural alterations.
- Adaptations and improvement work.
- Responsive repairs where CDM duties apply.

For the purposes of CDM 2015, construction work includes building, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration, maintenance, decommissioning and demolition activities.

CDM 2015 applies to all construction projects regardless of size or duration.

Policy Statement

The Association will fulfil its duties as Client under CDM 2015 and will ensure that all appointed duty holders possess the necessary skills, knowledge, experience and organisational capability to carry out their responsibilities effectively.

The Association will work collaboratively with designers, contractors and other stakeholders to eliminate, reduce and control foreseeable risks throughout the design, construction, occupation, maintenance and demolition of its assets.

Client Duties

The Association acknowledges its responsibilities as a Client under CDM 2015 and will:

Project Arrangements

- Make suitable arrangements for managing projects.
- Ensure sufficient time and resources are allocated to enable the project to be carried out safely.
- Maintain effective oversight of health and safety arrangements throughout the project.

Duty Holder Appointments

Where required by CDM 2015, the Association will appoint in writing:

- A Principal Designer; and
- A Principal Contractor.

Appointments shall be made as soon as practicable and before the relevant phase of work commences.

Skills, Knowledge and Experience

The Association will take reasonable steps to ensure that all appointed duty holders possess the appropriate:

- Skills;
- Knowledge;
- Experience; and
- Organisational capability to fulfil their statutory responsibilities.

Construction Phase Plan

The Association will ensure that an adequate Construction Phase Plan is prepared before construction work begins.

Work will not commence until suitable arrangements have been established and are documented to manage health and safety risks.

Health and Safety File

The Association will ensure that a Health and Safety File is prepared, reviewed and retained where required.

The file shall be maintained and made available to those responsible for future maintenance, alteration or demolition works.

Welfare Facilities

The Association will ensure suitable welfare facilities are provided throughout the construction phase.

HSE Notification

The Association will ensure projects are notified to the Health and Safety Executive (HSE) where notification thresholds specified within CDM 2015 are met.

Principle Designer Duties

The Principal Designer shall be responsible for planning, managing, monitoring and co-ordinating health and safety during the pre-construction phase.

Responsibilities include:

- Co-ordinating health and safety matters during the design process.
- Identifying and eliminating foreseeable risks where possible.
- Reducing and controlling remaining risks.
- Ensuring designers comply with their duties.
- Assisting the Client with the preparation and provision of pre-construction information.
- Liaising with the Principal Contractor throughout the project.
- Preparing, reviewing and updating the Health and Safety File.

Designer Duties

Designers engaged by the Association must:

- Eliminate foreseeable risks so far as reasonably practicable.
- Reduce or control risks that cannot be eliminated.
- Consider the health and safety of those constructing, maintaining, cleaning, occupying, refurbishing or demolishing the structure.
- Provide information regarding residual risks.

Principal Contractor Duties

Where appointed, the Principal Contractor shall:

- Plan, manage and monitor the construction phase.
- Co-ordinate contractors working on site.
- Prepare and implement the Construction Phase Plan.
- Ensure suitable site induction arrangements are undertaken.
- Manage site-specific risks effectively.
- Ensure suitable welfare facilities are provided and maintained.
- Engage and consult with the workforce on health and safety matters.
- Secure the site where necessary to prevent unauthorised access.

Contractor Duties

All contractors working on behalf of the Association shall:

- Comply with CDM 2015.
- Co-operate with duty holders.
- Follow site rules and project-specific requirements.
- Report hazards, incidents and near misses promptly.
- Ensure employees are adequately trained and supervised.
- Maintain safe systems of work.

Tenant and Resident Safety

The Association recognises that many construction activities may take place within occupied homes and communal areas.

Appropriate arrangements shall be implemented to:

- Inform residents of planned works.
- Identify vulnerable occupants.
- Minimise disruption.
- Manage access arrangements safely.
- Control risks to residents, visitors and employees.
- Ensure emergency arrangements are maintained throughout the works.

Monitoring and Compliance

The Association will monitor compliance with CDM 2015 through:

- Project reviews.
- Contractor performance monitoring.
- Health and safety inspections.
- Audit processes.
- Contract management activities.
- Incident investigation and learning reviews.

Any significant breaches of statutory duties shall be addressed promptly and escalated in accordance with the Association's governance arrangements.

Related Policies

This policy should be read in conjunction with:

- Health and Safety Policy Manual
- Asbestos Management Policy
- Fire Safety Policy
- Planned Maintenance Policy
- Procurement Policy
- Risk Management Policy
- Development Procedures
- Asset Management Strategy

Responsibility for Implementation

Overall responsibility for implementation of this policy rests with the Director of Asset Management.

Operational responsibility for compliance with CDM 2015 shall rest with managers, project leads and employees responsible for procuring, managing and delivering construction projects on behalf of the Association.

Review

This policy shall be reviewed every three years, or sooner where legislative, regulatory or operational changes require amendment.



Scottish Charity Number SC020981
Scottish Housing Regulator HAL65
Financial Conduct Authority 1665RS
Property Factor Registration Number PF000129