

## CONSTRUCTION, DESIGN & MANAGEMENT (CDM) REGULATIONS 2015 POLICY

**Policy Statement:** The prevention of all accidents involving personal injury or property damage is essential to the efficient operation of the McSence Group. It is the policy of McSence Group that its operations are executed always in such a way as to ensure it fulfils its obligations to meet the requirements of the Health & Safety at Work (HSATW) etc. Act 1974 which is the primary piece of legislation covering occupational health and safety in Great Britain. It's sometimes referred to as HSWA, the HSW Act, the 1974 Act or HASAWA. It sets out the general duties which employers have towards employees and members of the public; employees have to themselves and to each other; certain self-employed have towards themselves and others. From 1 October 2013 the revised Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR 2013) come into force. RIDDOR is the law that requires employers, and other people in charge of work premises, to report and keep records of: work-related accidents which cause deaths; work-related accidents which cause certain serious injuries (reportable injuries); diagnosed cases of certain industrial diseases; and certain 'dangerous occurrences' (incidents with the potential to cause harm).

The Chief Executive is responsible for the Group's Safety Policy including the co-ordination and monitoring of the policy and for effective safety communications within the company; all other relevant Health & Safety legislation and protect, so far as reasonably practicable, the health, safety, and welfare of all its employees and all persons likely to be affected by its activities. He will ensure that Health Safety and Environmental considerations are given equal priority to other business objectives. In addition, the Company employs a competent external Safety Adviser on a consulting basis and in this policy, the term 'safety' is defined to mean:

- ✚ The prevention of all injuries
- ✚ The promotion of occupational health and hygiene
- ✚ The control of all situations likely to cause damages to property and equipment

**All Employees:** This policy applies to all persons working for or on our behalf of the McSence Group of Companies which includes the subsidiary companies - *McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd* in any capacity including but not limited to:

- ✚ All employees at all levels, prospective employees, agency workers, seconded workers, temporary workers, contractors/sub-contractors, clients, agents, external consultants, volunteers, members of the public, group's supply chain, third-party representatives and/or business partners who will be referred to in our Group policies as "all employees".

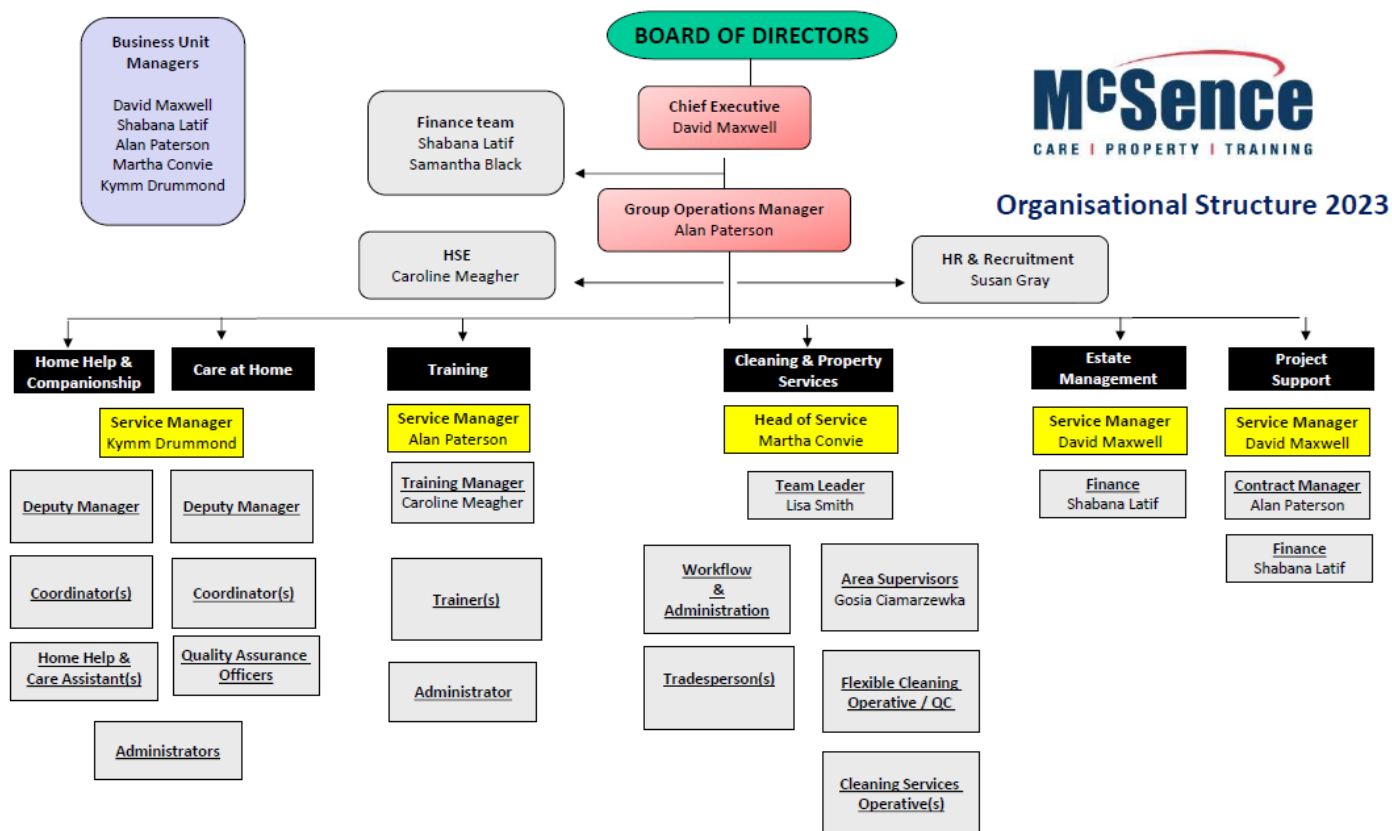
**The Workplace:** This policy applies to all persons working for or on our behalf of the McSence Group of Companies in any capacity at the workplace(s) as defined below which includes but not limited to:

- ✚ McSence Premises, Offices, Units, Business Park, Client's Premises, External Meeting Places, Customers' Homes, Gardens, Sheltered Housing, Whilst On-Call, On-Duty, Emergency Cover, Working from Home including On-Line Meetings, Whilst Driving in Company Time, Working Public Areas (café's, trains, coffee shops, buses etc) and will be referred to throughout this policy as "the workplace".

**Purpose:** The purpose of this document is to supplement the general Health & Safety Policy Statement, by setting down the organisation and arrangements within the group for ensuring the effective implementation of the policy throughout the Company's undertakings. It is also intended to pursue the aims of this policy by making adequate assessments of risk, managing operations effectively, monitoring results and implementing improvements identified.

**Organisational Structure:** The McSence Group operates within a number of different sectors and the organisation shown is designed to allow this policy to apply across all sectors of the McSence Group. The group recognises that all its employees can contribute to reducing accidents and ill health and that this is an integral part of the operational process. As such the group states that the management of health and safety is a function of line management and that supervision at all levels is responsible for the well-being of those under their control and for others to whom the group owes a duty of care.

Specific responsibilities are set down in the following section(s). Although subject to periodic change, line management will always be accurately defined by specified chains of command from the Chief Executive through to Business Unit / Service Managers and then, as defined by the individual unit management structure, to those working on the ground. McSence Group’s organisational chart outlining the Health & Safety structure is shown as follows:



**Responsibilities:** The following section sets out the responsibilities held by staff members and others. Where a particular post or role is vacant, the immediate line manager will assume the responsibilities of the missing duty holder.

**The Chief Executive** has been appointed on behalf of the Board of Directors to have overall responsibility for Health & Safety and for ensuring that this policy is put into practice and will:

- ✚ Report to the Board on all Health & Safety related matters
- ✚ Chair regular Health & Safety meetings, forums, and events
- ✚ Ensure the adoption and maintenance of proper standards of safety, health, and welfare in all areas of activity under his control to meet the requirements of the group’s Health & Safety Policy, the Health and Safety at Work etc. Act 1974 and all relevant Acts, Regulations or Codes or Practice
- ✚ Ensure effective safety communications within the McSence Group
- ✚ Implement the policy for the prevention of injury, damage, or wastage and to ensure the correct disposal of waste, particularly waste which is hazardous in nature and has implications for the environment
- ✚ Supervise the recording and analysis of information on injuries, damage, and loss, assess accident trends and review overall safety performance
- ✚ Arrange for adequate resources to meet the requirements of and ensure effectiveness of the Health and Safety Policy.
- ✚ Ensure that all levels of staff receive adequate and appropriate safety training
- ✚ Prepare and regularly review Emergency Evacuation Procedures and a Fire Assessment Report
- ✚ Ensure that the requirements of the Display Screen Regulations are communicated and complied with
- ✚ Foster within the Company an understanding that injury prevention and damage control are an integral part of the business and operational efficiency
- ✚ Set an example by high personal standards of application and discipline in ‘safety’
- ✚ The Chief Executive may choose to delegate some or all his duties to the Group Operations Manager, Group Business Development Manager, or the Business Unit / Service Managers

**Directors:** The Directors believe that every employee has a responsibility for 'safety' and it is therefore incumbent on all employees to take reasonable care for their own safety and the safety of any others who may be affected by their acts or omissions and also to co-operate with the Company in its arrangements to perform or comply with statutory safety obligations. To this effect this Policy Document and the Provisions contained herein are brought to the attention of all employees where we will:

- ✚ Identify, assess and manage the health and safety risks arising from our work
- ✚ Ensure the adoption and maintenance of proper standards of safety, health & welfare in all areas of activity including where appropriate safe systems of work
- ✚ Arrange for safe use, handling, storage and transport of articles and substances
- ✚ Provide and maintain safe plant and equipment
- ✚ Provide information, supervision and training to ensure competence
- ✚ Consult with our employees on matters affecting their health and safety
- ✚ Prevent accidents and cases of work-related ill health
- ✚ Regularly carry out reviews of this policy and related procedures and modify as necessary

**The Group Operations Manager** will have delegated authority to act on behalf of the Chief Executive and when the Chief Executive is not present or available. The Group Operations Manager will assume his responsibilities with regard to Health & Safety issues where they will:

- ✚ Undertake the duties of the Director responsible for Health & Safety as formally delegated to them
- ✚ Undertake the duties of the Business Unit / Service Managers as formally delegated to him
- ✚ Provide professional advice to the Director responsible for Health & Safety on all related matters
- ✚ Keep up to date with recommended Codes of Practice and new safety literature
- ✚ Circulate information applicable to each level of employee
- ✚ Ensure all records and reports are in order and up to date
- ✚ Set an example by high personal standards of application and discipline in safety

**Business Unit / Service Manager(s) / Head of Service:** Each individual part of the McSense Group is controlled and managed by a Business Unit / Service Manager who has responsibility for the performance of that division or department. Each of these managers will have overall responsibility for all Health & Safety matters relating to their activities and will report on these issues to the Chief Executive. The individual Business Unit / Service Managers will:

- ✚ Organise operations within the business park or on remote sites so that work is carried out to the required standard with minimum risk to colleagues, equipment, and materials
- ✚ Liaise with all other operational parts of the company on Health & Safety issues through the Chief Executive
- ✚ Ensure that appropriate assessments of hazards are conducted to minimise risks to the work force with particular reference to the current Management at Work Regulations, COSHH and The Noise at Work Regulations
- ✚ Determine the most appropriate order and method of working consistent with safe practice and ensure this is reviewed regularly and communicated to the workforce including highlighting potential hazards and indicating precautions to be adopted
- ✚ Know the broad requirements of the Health and Safety at Work etc. Act 1974 and the appropriate regulations, and other relevant legislation and Codes of Practice applicable to the work on which they are engaged
- ✚ Where appropriate see that the current Construction Health, Safety and Welfare Regulations and other legal requirements are observed and that all records and reports are in order
- ✚ Report all injury accident and dangerous occurrences and investigate these accidents and occurrences in an attempt to establish the cause and to prevent a recurrence and notify the HSE where required by RIDDOR
- ✚ Give all staff under their control precise instructions of their responsibilities for correct working methods
- ✚ Ensure that staff under their control do not take unnecessary risks
- ✚ Plan and maintain a tidy workplace
- ✚ Assess on a regular basis the health & safety policy and procedures of contractors and sub-contractors and monitor their performance on contracts. Ensure that sub-contractors are competent and have allocated sufficient resources and are aware of their responsibilities for health and safety
- ✚ Implement arrangements with sub-contractors and other contractors to avoid any confusion about areas of responsibility, and where appropriate to ensure that written safe systems of work are produced and approved prior to work commencing
- ✚ Ensure that the arrangement for first aid required by the Health and Safety (First Aid) Regulations, are available and that their location is known to employees

- ✚ Assess and monitor on a regular basis facility for Health & Safety, hygiene, and welfare within the workplace
- ✚ Accompany the Health and Safety Executive (HSE) Inspector on site visits and act on his recommendations and in the event of the issue of an 'Improvement' or a 'Prohibition' notice by the Inspector telephone details to the Director responsible for Safety
- ✚ Ensure all records and reports are in order and up to date
- ✚ Encourage, where necessary, suitable on and/or off-site safety training
- ✚ Set an example by high personal standards of application and discipline in 'safety'
- ✚ The Business Unit / Service Manager(s) may choose to delegate some or all of their duties to their direct team

**Health & Safety Advisor (internal):** The McSence Group's appointment person is the Training Manager who provides guidance and advice to management and all other employees of their particular safety functions. It is the duty of all employees to co-operate with the appointed person at all times and act on their instructions. The appointed person, when contracted will:

- ✚ Advise management on all safety matters and keep the company apprised of the success or otherwise of safety measures and advise the Director of possible alternative arrangements
- ✚ Carry out site inspections, in association with the Supervisor, to see that only safe methods of working are in operation and that all Regulations are being observed
- ✚ Assist in the determination of the cause of accidents or dangerous occurrences and recommend means of preventing recurrence
- ✚ Assist with training for all levels of employee
- ✚ Take part, where possible in management/operative discussion on preventing injury to personnel and damage to property as well as wastage control
- ✚ Suggest further improvement in existing safe working methods
- ✚ Advise on new plant and equipment from a safety viewpoint
- ✚ Advise on changes in legislation
- ✚ Keep the company up to date with Codes of Practice and Safety Literature; circulate information applicable
- ✚ Foster within the Company an understanding the injury prevention and damage control are an integral part of business and operational efficiency

**Certifications & Accreditations:** The group currently hold Acclaim SIPP DTS, CHAS, Constructionline Gold, Constructionline Silver, Constructionline Bronze, Constructionline Social Value, Safe Contractor, SEPA WCR.

**All Employees:** All employees have the responsibility for all Health & Safety matters relating to them and will report on these issues to their direct Line Manager where all employees have:

- ✚ A statutory duty to take reasonable care to safeguard their own health and safety and that of others who may be affected by their acts and omissions
- ✚ A statutory duty not to intentionally misuse or interfere with anything provided in the interests of health, safety, or welfare
- ✚ A statutory duty to comply with all regulations which affect their work and to report to the appropriate person any defective plant or equipment or any hazardous situations
- ✚ A responsibility to be aware of, and adhere to, any additional safety guidance issued by the Company
- ✚ A responsibility to co-operate with managers, supervisors, other employees, clients, and the Health & Safety Advisor on Health & Safety matters
- ✚ Be familiar with the current Construction Health, Safety and Welfare and COSHH Regulations, and other relevant legislation and Codes of Practice applicable to the work on which they are engaged and ensure that these requirements are observed
- ✚ Plan and maintain a tidy workplace
- ✚ Make sure that protective clothing is available where appropriate and that it is used
- ✚ Not permit the use of plant and equipment which is in an unsafe condition and immediately report the defects
- ✚ Set an example by high personal standards of application and discipline in 'safety'

**Young Persons:** Those responsible for the Employment of Young Persons under 18 years of age will:

- ✚ Supervise or arrange supervision of the young person.
- ✚ Inform the young person that they must NOT operate, any plant or equipment unless being supervised



- ✚ Arrange the training for the above and ensure the young person is under the direct supervision of a competent person.

**Contactors:** We will assess and monitor the health and safety competence of all (sub) contractors appointed by us. We will ensure that suitable and sufficient information is given to Clients, Principal Designers, Principal Contractors and Sub Contractors (as appropriate) on all our contracts.

The prime responsibility for safe operation and a safe place of work rests clearly upon all sectors of management and the Company will ensure that the policy is pursued with diligence. McSense is committed to the implementation of good health and safety practice in the implementation and delivery of all of its projects. The Construction (Design and Management) Regulations 2015 (“CDM”) are intended to protect the health and safety of people working in construction and others who may be affected by their activities.

CDM place specific duties upon clients, principal designers and designers, principal contractors and contractors, and workers to develop their approach to health and safety so that it is taken into account and then coordinated and managed effectively throughout all stages of a construction project.

Contractors and the workers under their control are most at risk of injury and ill health from construction work. McSense understands its important role in planning, managing and monitoring work to ensure any risks are controlled. It has the skills, knowledge, experience and organisational capability to carry out the work safely and without risk to health.

The Company acts as both Principal Contractor and Contractor and its CDM Policy lays out the duties of each role. Where relevant, McSense will ensure compliance with the CDM requirements by:

- ✚ Making sure the client is aware of the client duties under CDM 2015 before any work starts
- ✚ Planning, managing and monitoring all work carried out by the Company and its workers, taking into account the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them
- ✚ Preparing a written construction phase plan before the construction phase begins, implementing, and then regularly reviewing and revising it to ensure it remains fit for purpose
- ✚ Checking that all workers employed or appointed have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them
- ✚ Making sure that all workers under its control have a suitable, site-specific induction
- ✚ Providing appropriate supervision, information and instructions to workers under its control
- ✚ Ensuring work does not commence on site unless reasonable steps have been taken to prevent unauthorised access
- ✚ Ensuring suitable welfare facilities are provided and maintained
- ✚ Coordinating with other contractors where required

**Construction (Design and Management) Regulations 2015 (CDM 2015):** A contractor is anyone who directly employs or engages construction workers or manages construction work. Contractors include sub-contractors, any individual self-employed worker or business that carries out, manages or controls construction work. They must have the skills, knowledge, experience and, where relevant, the organisational capability to carry out the work safely and without risk to health. Contractors and the workers under their control are most at risk of injury and ill health from construction work. Contractors therefore have an important role in planning, managing and monitoring their work to ensure any risks are controlled. Contractors on all projects must:

- ✚ Make sure the client is aware of the client duties under CDM 2015 before any work starts
- ✚ Plan, manage and monitor all work carried out by themselves and their workers, taking into account the risks to anyone who might be affected by it (including members of the public) and the measures needed to protect them
- ✚ Check that all workers they employ or appoint have the skills, knowledge, training and experience to carry out the work, or are in the process of obtaining them
- ✚ Make sure that all workers under their control have a suitable, site-specific induction, unless this has already been provided by the principal contractor

- ✚ Provide appropriate supervision, information and instructions to workers under their control
- ✚ Ensure they do not start work on site unless reasonable steps have been taken to prevent unauthorised access
- ✚ Ensure suitable welfare facilities are provided from the start for workers under their control, and maintain them throughout the work

In addition to the above responsibilities, contractors working on projects involving more than one contractor must:

- ✚ Coordinate their work with the work of others in the project team
- ✚ Comply with directions given by the principal designer or principal contractor
- ✚ Comply with parts of the construction phase plan (PDF) relevant to their work

**Construction Phase Plan:** Where a contractor is the only contractor working on a project, they must ensure a construction phase plan (PDF) is drawn up before setting up the site. When working as the only contractor for a domestic client, the contractor takes on the client duties, as well as their own as contractor. However, this should involve them doing no more than they will normally do to comply with health and safety law. Where a domestic project involves more than one contractor, the principal contractor normally takes on the client duties and the contractor will work to the principal contractor as 'client'. If the domestic client does not appoint a principal contractor, the role of the principal contractor must be carried out by the contractor as principal contractor and the client duties must be carried out by the contractor in control of the construction phase and the client duties must be carried out by the contractor as principal contractor. Alternatively, the domestic client can ask the principal designer to take on the client duties (although this must be confirmed in a written agreement), and the contractor must work to them as 'client' under CDM 2015.

**Construction (Design and Management) Regulations 2015 (CDM 2015) Contractor Responsibilities:** In summary CDM 2015 came into force on 6 April 2015 to address the failure of the previous legislation to prevent the large number of fatal accidents that continue to occur on small sites. As a consequence, CDM 2015 is relevant to McSence Cleaning & Property Services as the Group employs individuals to carry out construction work on our behalf as well as those involved in construction and design. All those involved in construction, whether as clients or service providers, you need to ensure that you are acting in compliance with CDM 2015 and should consult the HSE's guidance which can be found [Construction - Construction Design and Management Regulations 2015 \(hse.gov.uk\)](https://www.hse.gov.uk/construction/)

**Company Intranet – Staff Zone:** All the McSence Groups policies, procedures, handbooks are available on-line to all employees on the McSence Group's Staff Zone Intranet via our website [Login | McSence](#)

**Compliance:** Failure to comply with the provisions of this Policy may result in Disciplinary proceedings.



*McSence Group Signatory:*

**David Maxwell | Chief Executive**

**McSence Group - McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd**

**T: 0131 454 1500 | E: [mail@mcsence.co.uk](mailto:mail@mcsence.co.uk) | W: [www.mcsence.co.uk](http://www.mcsence.co.uk) | FB: [www.facebook.com/McSenceGroup](https://www.facebook.com/McSenceGroup)**

**Policy Amendments & Revisions:** This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review. Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Senior Management Team (SMT) to see that all relevant employees receive notice and training if necessary.