

Construction Industry Council CDM Guidance for Designers

Preparing practice policies

General Guidance Note

G 10.001

INTRODUCTION

1 A practice CDM policy should demonstrate that a design practice:

- a) Is committed to implementing the CDM Regulations;
- b) Is committed to an ongoing learning process;
- c) Treats CDM as part of the design process.

2 It should also contain concise practical advice for designers about how they can satisfy their duties under regulation 13.

3 And, like any other design aid, it should assist designers in acquiring an awareness of CDM, by the development of concise and user-friendly practice policies, containing information, which will, over time by continued use, become a natural part of the design thought process.

4 This guidance note gives advice on what a practice policy should contain for it to be effective, ie, one that helps designers to discharge their statutory duties under the CDM regulations.

CONTENT OF PRACTICE POLICIES

Preliminaries

5 It is necessary to demonstrate that the Practice Principals support the implementation of CDM. It could contain a statement to this effect, signed by the Principal with responsibility for CDM.

6 In addition, the policy could clarify:

- a) The level of CDM knowledge that it expects people at various levels in the company to have. For example, it may not expect a draftsman to have the same level of knowledge as a senior engineer; and
- b) Who is responsible for the CDM overview on projects.

Brief overview of CDM

7 There is not a lot to be gained by restating the regulations in the Policy. It is more important to ensure that designers understand the main principles behind the regulations, which are, in order:

- a) to make the dangerous non-dangerous, i.e., remove the hazard wherever it is possible to do so; or
- b) to make the dangerous less dangerous, i.e., reduce the chances of the hazard occurring; and then
- c) to provide sufficient information about residual hazards, to help a contractor to manage the hazard on site;

Technical content

8 The information in the General Guidance Series **G 30.001 What Designers Should Know**, provides a good starting point for the development of the contents in a practice policy.

9 To help designers gain an awareness of the issues dealt with in **G 30.001**, practice policies should contain a list of the hazards on construction sites, which a contractor has to control by law under:

- a) Construction (Health, Safety and Welfare) Regulations 1996;
- b) Control of Substances Hazardous to Health Regulations 1994;
- c) Noise at work Regulations 1998;
- d) Lifting and Lifting Operations Regulations 1998;
- e) Confined Spaces Regulations 1996;
- f) Manual Handling Regulations 1994.

10 A simple statement of what hazards exist is of little use, unless designers understand where they could be encountered or how they could be created, because this is not always obvious [from the text of the Regulations].

11 Within design, choices have to be made. Depending on the choices made, different hazards will arise.

Unavoidable hazards

12 Unavoidable hazards are linked to a necessary process and workers can be exposed to single obvious hazards, eg: side slip in an excavation, or combinations of obvious and not so obvious hazards, depending on their work situation. For example:

- a) In an excavation workers will encounter [are exposed to] the obvious hazard of collapse of the sides of the excavation. But, depending on where the excavation is, they could also be exposed to hazards associated with:
 - i. Flooding, in excavations below the water table;
 - ii. Confined spaces in deep and narrow excavations;
 - iii. Hazardous material in contaminated land;
 - iv. Explosions, on sites containing methane, etc.
- b) Operatives installing pipe-work between beams will encounter [are exposed to] the obvious hazard of working at height. However, if the beams are sufficiently close together and are of sufficient depth, they may also be

exposed to the hazard of working in a confined space.

Practice policies should identify this matrix of hazards and present it in an easily understood form. Tabular layouts, which provide at-a-glance guidance are known to be effective.

Hazards created by design

13 When designers specify a construction process, they could be creating a hazard, because the specified process could expose workers to the harmful side effects that accompany it. For example:

- a) Scabbling concrete is accompanied by noise and vibration, which have a chronic effect;
- b) Pile driving, is usually accompanied by noise and vibration;
- c) Using solvent-based paints is usually accompanied by vapours, which may be harmful;
- d) Positioning pre-cast concrete units could be accompanied by workers working close to an unguarded leading edge;
- e) Hand breaking out of piles is accompanied by noise and vibration; etc.

To prevent, as far as it is possible to do so, the creation of hazards by a design, Practice policies should contain a list of proscribed activities, which should be implemented across the whole practice. Processes that could appear on such a list include:

- a) Continuous-flight augered piling in contaminated land;
- b) Lifting loads over a large radius;
- c) Scabbling concrete, unless it is absolutely necessary for the strength of a joint;
- d) Painting of steelwork on site;
- e) Not allowing adequate working space in an excavation; etc

11 However, it is not sufficient to proscribe processes. Alternative ways of achieving the end result should be provided. Therefore, for each proscribed activity, an alternative safer process should be specified. For example:

- a) Retarding and washing off as an alternative to scabbling;
- b) Using quiet driving techniques;
- c) Water based alternative to solvent based paints;

12 In addition, policies should require items that would assist contractors to manage the hazard on the site, to be specified, eg:

- a) Holes in steelwork to anchor lanyards;
 - b) Lifting points in pre-cast or pre-assembled panels;
 - c) Use of lightweight blocks;
- and develop details to standardise their specification.

13 Finally, policies should contain information about temporary works systems, which can be adapted for pre-fitting to components of the

permanent works, eg: temporary guard-rails, anchor points, etc.

MANAGEMENT OF THE POLICY

14 Practice CDM policies should be kept up to date. They should be subject to continual review which should incorporate:

- a) Feedback from sites; and
- b) Information about CDM-friendly developments in the state-of-the-art for plant, or other items used in construction; and