



Vodafone Policy Detailed Requirements

Construction (Design & Management)

Policy Owner:	Policy Champion:	Version:	Date:
David Fry	Tom Young	Version 3.1	February 2024

Objective/Risk:	Scope
<p>This document sets out how Vodafone UK complies with their legal duties under the Construction (Design and Management) Regulations 2015 (CDM). The Regulations exist to protect construction workers and anyone affected by construction activities from injury and ill health. They are also intended to protect anyone whose health and safety could be affected by the premises involved in a construction project in the future, for instance those who work there, maintain or clean the premises.</p>	<p>This document applies to all construction activities undertaken by or on behalf of Vodafone UK within the United Kingdom where Vodafone UK is acting as the Client, Principal Designer and / or Principal Contractor.</p> <p>For advice and guidance on undertaking these roles please seek advice from the HSE.Helpline@vodafone.com.</p>
<p>Compliance levels are monitored and reviewed by appropriate governance bodies. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary action.</p>	

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1 Policy principles

This document sets out how Vodafone UK complies with our legal duties under the Construction (Design and Management) Regulations 2015 (CDM). The Regulations exist to protect construction workers and anyone affected by construction activities from injury and ill health. They are also intended to protect anyone whose health and safety could be affected by the premises involved in a construction project in the future, for instance those who work there, maintain or clean the premises.

The document does not give all the requirements of the regulations but shows how you can meet the relevant requirements in practice. For full information on what the CDM regulations require, this document should be read in conjunction with:

- [HSE CDM Guidance](#)
- [CITB CDM Guidance](#)

1.1 Definitions

CDM – The Construction (Design & Management) Regulations 2015

Construction work – The carrying out of any building, civil engineering or engineering construction work and includes:

- The construction, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, 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), de-commissioning, demolition or dismantling of a structure;
- The preparation for an intended structure, including site clearance, exploration, investigation (but not site survey) and excavation (but not pre-construction archaeological investigations), and the clearance or preparation of the site or structure for use or occupation at its conclusion;
- The assembly on site of prefabricated elements to form a structure or the disassembly on site of the prefabricated elements which, immediately before such disassembly, formed a structure;
- The removal of a structure, or of any product or waste resulting from demolition or dismantling of a structure, or from disassembly of prefabricated elements which immediately before such disassembly formed such a structure;
- The installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure.

NORA – **New Opportunity Risk Assessment** – A Questionnaire for self-completion to help you understand and define what support a project will require.

Intrusive Works – Any works which involve breaking into the fabric of the building; this may introduce a risk of exposure to live services or substances, e.g. asbestos.

Plug & Play Equipment – Equipment having cables with terminated ends (e.g. three pin plugs) which, through design, pose minimal safety risk to the installer.

1.2 Information

For help or guidance on CDM matters please contact HSE.Helpline@vodafone.com or 03333 04 6666.

VF have also provided an online tool to help identify when additional H&S duties might apply. [NORA](#) can be used to indicate whether CDM will be relevant on any new, or existing opportunities.



VF have created a free to access CDM 2015 Awareness E-Learning training course. This course provides an introduction in to what CDM is and what responsibilities there are. Access the training [here](#).

In line with [Masts and Towers Safety Group Guidance Note GN-003](#) the following will not be classed as construction activities.

- Installing cards and amplifiers
- Installing or upgrading software
- Placing telecommunications equipment (e.g. phones) on desks
- Installing any 'plug and play' equipment
- Moving equipment racks when there are no associated 'intrusive' or electrical works
- Surveying
- Mast and tower inspections

Appropriate Risk Assessments & Safe Systems of Work will still be required for the above activities.

2 Roles and Responsibilities

2.1 Duty Holders

Several duty holders have responsibility under CDM for all construction projects they are involved in.

- Clients – The organisation or people that the project is carried out for.
- Designers – Anyone who prepares designs or arranges for other people to prepare designs.
- Principal Designer (PD) - The main or managing designer.
- Contractors – Someone who is self-employed or employed by an organisation other than Vodafone UK and who provides a service (either under a contract for services or a contract of employment). This includes temporary workers. Vodafone UK may also be a contractor.
- Principal Contractor (PC) – The main or managing contractor.

2.2 Vodafone UK Duties

Vodafone UK may act as one or more of the following duty holders. The links below explain how to fulfil these duties and provide hyperlinks to the documents you may need.

- [Client](#)
- [Principal Designer](#)
- [Principal Contractor](#)
- [Contractor](#)

Where Vodafone UK have not been appointed as Principal Contractor, they will assume the role of Contractor as detailed in [CDM 2015, Reg 15](#). Contractor must not carry out construction work in relation to a project unless satisfied that the client is aware of the duties owed by the client under the CDM 2015 Regulations. In cases where the contractor is the only one involved, they must liaise directly with the client to establish this.

3 Policy controls and deliverables required for compliance

3.1 Notifiable / Non-Notifiable Projects

Notifiable construction work - [F10 notification](#)

The Health and Safety Executive (HSE) must be notified of construction work where construction is expected to:



- Last more than 30 working days and involve, at least, 20 people working simultaneously; or involve more than 500 person days.

Where a project, which is not notifiable, requires a short extension or short-term increase in the number of people, there is no need to notify the HSE. However, if the work or scope of the project changes significantly so that it becomes notifiable, the HSE must be informed.

Non-notifiable construction work

This is construction work which does not meet or exceed the thresholds set out in 3.1.1. There is no requirement to formally notify the HSE of this work. However, the principles of construction safety management set out in this document still apply.

3.2 Pre-construction information

The Client must provide relevant information which may already be available, or that can be obtained by sensible enquiries, for example, Asbestos surveys building or ground surveys, existing H&S File, existing Hand Over Packs (HoP's) or the results of other investigations. This pre-construction information is required on all projects.

This information must be provided as soon as is practicable to every designer and contractor appointed or being considered for appointment.

On projects with more than one contractor, a principal designer must be appointed. The principal designer will assist in putting this information together as they have a duty to do this.

3.3 Appointing competent duty holders

Any person or organisation appointed by Vodafone UK to fulfil a role under CDM must be competent to do so. This must be managed using the Vodafone UK supplier onboarding process. In order for a supplier to be appointed to fulfil a construction project role they must, as a minimum, hold the relevant SafeContractor Accreditation. Appointments must be made in writing by the Client.

3.4 Co-operation and co-ordination between all parties

Everyone with duties under CDM 2015 must cooperate with others involved with the project or any project on an adjoining site. This means working with each other to ensure health and safety for all concerned. This should involve communicating with others and understanding what they are doing and in what sequence, e.g., by holding regular coordination and progress meetings.

For lower-risk projects involving more than one contractor, a low-key approach will be sufficient. In higher risk projects, a more rigorous approach to cooperation, coordination and planning will be needed. There must also be effective communications between different organisations where they work in close proximity on the same site or on adjoining sites, eg daily updates to make sure there is a common understanding of the work being planned. In all cases, action taken should be in proportion to the risks the construction work activity presents.

3.5 Welfare

It is the responsibility of the contractor undertaking the construction work to provide adequate welfare facilities on site, the Client is responsible for ensuring that this has been done.

3.6 Construction Phase Plan

For every construction project regardless of size, duration, fixed or transient, a Construction Phase Plan must be created and kept up to date until the end of the construction phase.



The Client is responsible for ensuring that the Principal Contractor has prepared a Construction Phase Plan that is suitable and specific to the project. It must be prepared before construction work begins.

The Client must ensure that construction work does not start unless a suitable plan has been prepared and must allow sufficient time in the project for the Principal Contractor to prepare the plan before construction work begins.

3.7 Health and safety file

A health and safety file must be created during a construction project to provide information needed for the future use, cleaning, maintenance, alterations, refurbishment and demolition of the premises.

The Client, Principal Designer and Principal Contractor are responsible for agreeing appropriate arrangements for collecting and compiling information and timescales for when the file should be handed over. They must also provide any necessary information for the file promptly and for ensuring that it is accurate.

The Principal Designer is responsible for preparing the health and safety file and providing it to the Client as soon as possible, i.e. at or before completion of the construction phase. The Client is responsible for reviewing the file to ensure that it is adequate and ensure the health and safety file available to all interested parties especially those who will be responsible for managing and maintaining the site post construction phase.

3.8 Monitoring and auditing

The Client is responsible for determining what monitoring and auditing is carried out on each project. This includes:

- Regular meetings
- Regular inspections of the contractor's operations.
- Reactive monitoring must include routine reporting by the service provider to the Client of the following information:
 - Accidents, incidents and ill health reporting
 - The results of accident, incidents and ill health investigations
 - Enforcement actions.
- Monitoring the activities of all parties
- Inspecting the site regularly during the construction phase
- Observing behaviour on site
- Auditing the parties involved in the project to ensure they adequately manage health and safety in relation to their duties under the CDM Regulations
- Asking for regular reports from all parties on health and safety performance during the project.

3.9 Keeping records

The Client is responsible for keeping all records for at least five years, relating to selecting contractors, managing, monitoring and auditing CDM projects.

Construction health and safety files must be kept for as long as they are relevant.

4 Exceptions

Any exception or exemption to the controls set out in this document must be discussed and agreed by the health and safety team by contacting HSE.Helpdesk@vodafone.com.



5 Supporting documents

Use the hyperlinks in the table below for quick access to the guidance and templates relevant to each CDM 2015 role.		
Client	Principal Designer	Principal Contractor
Client Duties Explained	Principal Designer Duties Explained	Principal Contractor Duties Explained
CDM 2015 Appointment Letter Template	Design Stage Risk Register Template	Construction Phase Plan Template
Pre-Construction Information Template	Health and Safety File Template	Small Projects Construction Phase Plan
Client Pre-Construction Checklist Template	Health and Safety File Checklist Template	Welfare Facilities Checklist
Client Project Brief Template	Principals of Prevention	CDM Principal Contractor Toolbox Talk
CDM Client Toolbox Talk	CDM Principal Designer Toolbox Talk	Industry guidance for Principal Contractors
Industry guidance for Clients	Industry guidance for Principal Designers	

[Industry guidance for Designers](#)

[Industry guidance for Contractors](#)

[Industry guidance for Workers](#)

[Masts and Towers Safety Group Guidance Note GN-003](#)

6 Document history

Version	Date	Changes	Other standards affected	Approved by
1.0	April 2019	Original document		Eileen Roddis
2.0	August 2022	Review of policy		Eileen Roddis
3.0	January 2023	Re-write of policy to include new guidance & template documents	None	Eileen Roddis
3.1	February 2024	Review and changes to section 2.2 to add in the role of Contractor.		Tom Young



7 Appendix A - Construction (Design & Management) Process Flow

