



Construction Health and Safety Policy, Arrangements and Procedures

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## 1. Introduction

This policy document sets out the commitment, the requirements and expectations of The British Land Company PLC (British Land) with regards to the health and safety management of their construction projects and associated activities.

The Construction (Design and Management) Regulations 2015 (CDM) place specific obligations on British Land when acting as the Client on construction projects. This construction health and safety policy document sets out the role, obligations and actions required during the feasibility, design and construction of our development projects.

To ensure the core requirements of the CDM Regulations and other relevant legislation are met, appropriate support will be provided to all the parties to ensure the highest standards of health and safety are achieved. The same commitment is expected from all parties, consultants and contractors involved in every British Land project from executive and senior level to the workforce.

British Land believes that Clients, Principal Designers, Designers, Contractors and Health and Safety Professionals all have a vital role to play in ensuring health and safety risks are managed effectively during construction. By insisting that all project participants adhere to common health and safety standards British Land seeks to ensure that every project is delivered without injury or ill health affecting anyone involved.

## 2. Policy

### Construction Health and Safety Policy Statement

British Land's overall objective is to generate sustainable long-term total returns for our shareholders and we do this by creating *places people prefer*.

As well as being a moral obligation, careful management of health and safety is a key component in providing properties where people want to live, work and shop for the benefit of our customers. In addition, it improves our operational resilience and enhances our attractiveness as an employer and partner of choice for investors, occupiers, suppliers and the local communities in which we operate. Together these factors make a significant contribution towards our overall objective and this policy sets out our approach.

### Our Health and Safety Mission

- We are committed to providing safe and healthy environments for all users of the buildings and places we manage, and to the wellbeing of our staff.
- We aim to be a leader in our industry and set ourselves ambitious targets which we monitor our performance against.
- We are committed to continual improvement in health and safety management and performance, including throughout our supply chain.

### Our Responsibilities

Our base line responsibilities under the Health and Safety at Work etc. Act 1974 are, so far as is reasonably practicable:

- to provide and maintain plant and equipment as well as systems of work that are safe and without risks to health;
- to make arrangements for the safe use, handling, storage and transport of articles and substances;
- to provide such information, instruction, training and supervision as is necessary to ensure the health and safety of the users of our buildings and those involved in our head office activities;
- to maintain a safe means of access to and egress from our properties, including our head office;
- to provide and maintain environments at our properties, including our head office, which are safe and without risks to health;
- to conduct undertakings to protect the Health and Safety risks of 3<sup>rd</sup> parties.

Construction (Design and Management) Regulations 2015:

- to ensure that where we act as a Client we discharge our duties.

We are committed to the prevention of injury and ill health to our employees and all users of our properties.

We are committed to complying with all applicable legal health and safety requirements and other relevant regulation.

## Our Approach

British Land has implemented a Health and Safety management system which is aligned to the requirements of BS OHSAS 18001 and consider adapting to ISO 45001, which is subject to ongoing review against the requirements of that standard. This management system governs:

- the form and structure of management oversight and co-ordination of the company's response to health and safety risks;
- the establishment and independent yearly review of our health and safety objectives and how progress against these is measured and monitored;
- the use of risk assessments in each area of the business enabling us to respond to identified health and safety risks and achieve continuous improvement;
- establishment and implementation of relevant policies and procedures; and
- the approach to ensuring that all staff are aware of their responsibilities in respect of health and safety and properly trained to be able to fulfil these responsibilities.

## Governance of this Policy

This policy statement applies to all of our activities as both an employer and as an owner, developer and manager of property. It is owned by the Executive Director with health and safety responsibility.

This policy will be reviewed periodically and not less than once a year, to ensure that it remains appropriate and aligned with the activities, objectives and strategy of the company. This policy is made available to all staff within the staff handbook, available on the company's intranet system. It will be covered in induction training for all new staff, and ongoing periodic health and safety training for existing staff where appropriate.

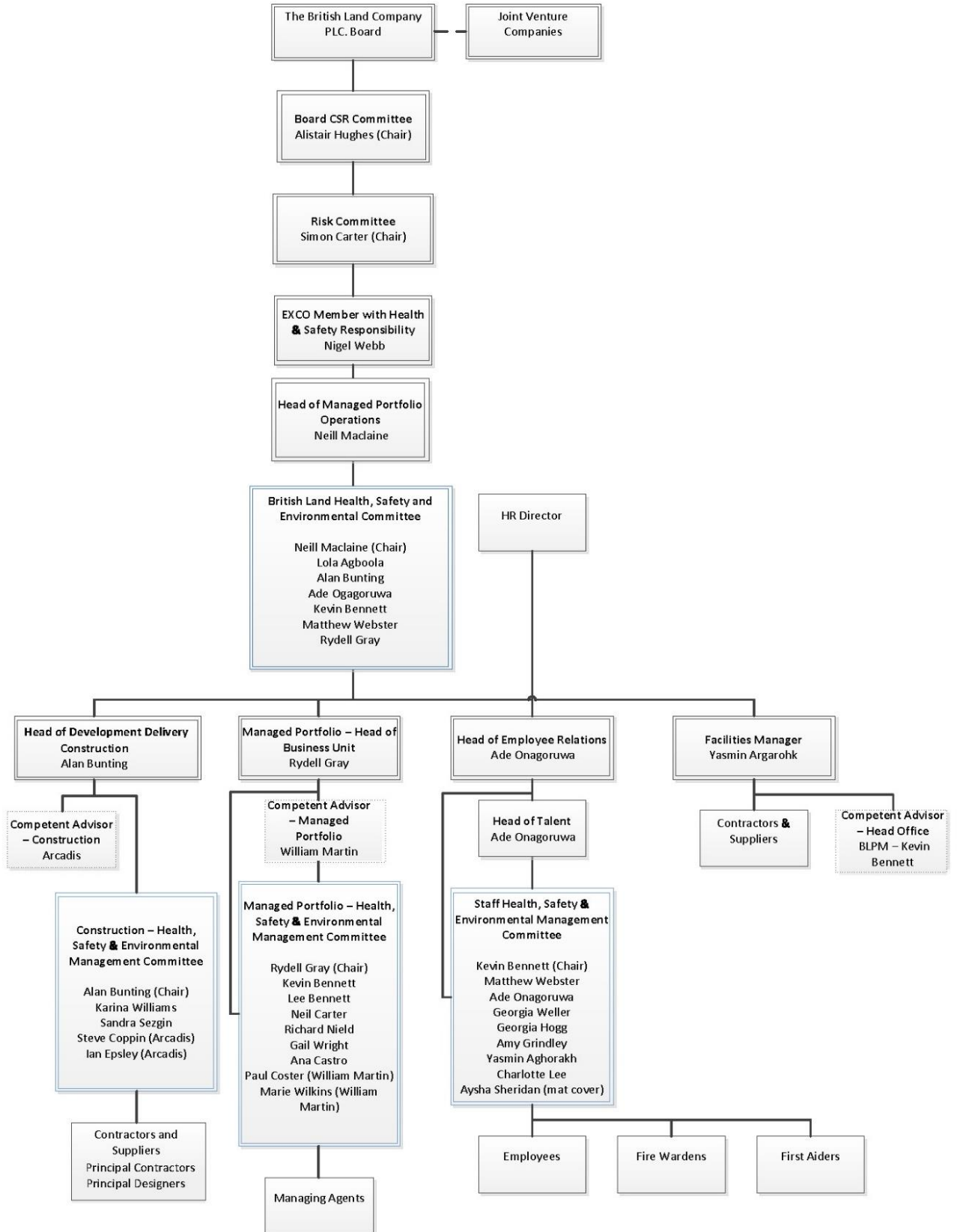
This policy is published on the company's website so that it can be accessed by all of our stakeholders and other interested parties.



Nigel Webb  
ExCo Member with Health & Safety Responsibility

### 3. Health & Safety Management Organisation Structure Chart

**BRITISH LAND HEALTH, SAFETY AND ENVIRONMENTAL COMMITTEES  
REPORTING STRUCTURE**



## 4. Roles and Responsibilities

### 4.1. British Land as Client of Construction Projects

British Land regularly procures construction projects and the teams of consultants and contractors that support it in the design, planning, preparation and execution of them. This role is often referred to as the construction Client.

In this role, British Land attracts duties and responsibilities under a variety of health and safety legislation, the core ones being:

- The Health & Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Construction (Design and Management) Regulations (CDM) 2015
- Workplace (Health, Safety and Welfare) Regulations 1992
- Control of Asbestos Regulations 2012

The tables on the following pages highlight the key responsibilities under this legislation that relate to British Land's role, as Client on construction projects.

We are committed to ensure that safe and healthy environments are provided for all our partners (i.e. Principal Designers, Designers, Principal Contractors, trade Contractors sub-Contractors and Specialist Survey Consultants) involved in our development projects.

More detail surrounding these duty holders' and professionals' roles and responsibilities can be found in the respective Regulations and associated Approved Codes of Practice and Guidance (available from the HSE's website [www.hse.gov.uk](http://www.hse.gov.uk)).

RAACI Matrix		Definitions of the RAACI Categories
<b>R</b>	<b>Responsible</b>	Person who performs the activity or does the work.
<b>A</b>	<b>Accountable</b>	Person who is ultimately accountable and has Yes/No/Veto (makes the final decision (the buck stops here)).
<b>A</b>	<b>Advice</b>	Providing Competent Advice
<b>C</b>	<b>Consulted</b>	Person who must be consulted (that needs to feedback) and contribute to the activity before action taken.
<b>I</b>	<b>Informed</b>	Person that needs to know of the decision or action has been taken



### 4.1.1. CDM Regulations – Key Client Responsibilities

The following summarises the key Client responsibilities under the CDM Regulations for Notifiable<sup>1</sup> and Non-Notifiable<sup>2</sup> projects.

Refer to Section 4 to see these responsibilities against the RIBA Plan design and construction work stages. The CDM Guidance Document L153 also provides further details on the Client's roles and responsibilities. This can be found on the HSE website ([www.hse.gov.uk/construction](http://www.hse.gov.uk/construction)).

Key Client Responsibilities	Applicability	Who is Accountable
Where there is more than one Client involved in the project (i.e. a Joint Venture arrangement), the CDM Client is to be elected in writing (this could be both parties where responsibility is shared).	All projects	Project Executive/Project Director
Ensure that there are suitable project specific management arrangements for the project. Refer to Appendix 2. For details on the requirements for Management Arrangements see CDM 15 L153 Guidance 4, 5, paragraph 33, 35, 41 and Guidance 6 paragraph 58 to 65.	All projects	Project Executive/Project Director
Allow sufficient time and resources for all stages of the project – including the identification of the minimum time that will be given to directly appointed Contractors (including Principal Contractors) from appointment to start on site.	All projects	Project Executive/Project Director
If more than one Contractor will be working on the project appoint a Principal Designer and a Principal Contractor in writing.	All projects	Project Executive/Project Director
Carry out specific enquires to ensure that the people and organisations they appoint have the skills, knowledge, experience and (if an organisation) the organisational capability to manage health and safety risks relevant to the task or project.	All Projects	Project Executive/Project Director
Promptly provide Pre-Construction Information (PCI) to Designers and Contractors (all projects).	All projects	Project Executive/Project Director
Ensure that a single Health & Safety File is produced per structure/building.	If more than one Contractor will be working on the project.	Project Executive/Project Director
Ensure that the construction phase does not start unless the Principal Contractor/Contractor has prepared an adequate Construction Phase Plan and that suitable welfare facilities will be provided at the commencement of work on site.	All projects	Project Executive/Project Director
Ensure that the construction phase does not start unless the Principal Contractor/Contractor has prepared an adequate Construction Phase Plan and that suitable welfare facilities will be provided at the	All projects	Project Executive/Project Director

<sup>1</sup> Notifiable projects are projects where the construction work will last more than 30 working days and have more than 20 Workers simultaneously at any time or exceed 500 person days.

<sup>2</sup> Non-Notifiable projects are projects where the construction work will last 30 working days or less, or 500 person days or less

Key Client Responsibilities	Applicability	Who is Accountable
commencement of work on site.		
Co-operate with and seek the co-operation of every person concerned with the project.	All projects	Project Executive/Project Director
The following becomes the responsibility of British Land's Property Management team on handover of the Health & Safety File  Retain and provide access to the Health & Safety File;  Ensure the Health & Safety File is kept available for inspection by those that need it;  Ensure that the Health & Safety File is revised as often as may be appropriate to incorporate new information.	All projects	Project Executive/Project Director

#### 4.1.2. Workplace (Health, Safety & Welfare) Regulations – Key Client Responsibilities

Refer to Section 4 to see these responsibilities against the RIBA Plan design and construction work stages. Further information on the Workplace (Health, Safety and Welfare) Regulations can be found on the HSE website ([www.hse.gov.uk](http://www.hse.gov.uk)).

Key Client Responsibilities	Applicability	Who is Accountable
British Land must ensure that any structure designed for use, as a workplace complies with the Workplace (Health, Safety and Welfare) Regulations.	All projects	Project Executive/Project Director

### 4.1.3. The Management of Health & Safety at Work Regulations – Key Client Responsibilities

Refer to Section 4 to see these responsibilities against the RIBA Plan design and construction work stages. Further information on the requirements under the Management of Health and Safety at Work Regulations can be found on the HSE's website ([www.hse.gov.uk](http://www.hse.gov.uk)).

Key Client (Employer's) Responsibilities	Applicability	Who is Accountable
British Land must ensure the health, safety and wellbeing of all those working in or visiting its premises – through risk assessment and implementing appropriate controls and procedures.	All projects	Project Executive/Project Director
British Land must provide Contractors information on: <ul style="list-style-type: none"> <li>the health and safety risks they may face;</li> <li>the measures in place to deal with existing hazards and risks;</li> <li>applying the principles of prevention</li> <li>existing arrangements for coordination and cooperation with other employers and parties</li> <li>how to follow any emergency procedures.</li> </ul>	All projects	Project Executive/Project Director

Note:

*The above relates to when British Land requires the project team, surveyors or others to undertake work in the premises that is being considered for the project – e.g. walk arounds, visual inspections/surveys, intrusive surveys.*

*In cases where the property is managed by British Land, the risk assessment and appropriate controls and procedures will have been undertaken and implemented by British Land's Property Management Team or appointed managing agent. Those visiting the property should comply with the procedures provided to them. If the procedures are not provided, then the visitors have the right to request this information prior to entry.*

*For cases where visual or intrusive surveys are to be undertaken, British Land's Property Management Team should review their risk assessments to ensure that the control measures and procedures that are in place are appropriate to the tasks to be undertaken.*

#### 4.1.4. Control of Asbestos Regulations – Key Client Responsibilities

Refer to Section 4 to see these responsibilities against the RIBA Plan design and construction work stages.

The responsibilities below have been taken from both the Control of Asbestos Regulations 2012, Approved Code of Practice and guidance L143 (Second edition) and HSG264 (Second edition): The Survey Guide. Both of these documents are available on the HSE's website ([www.hse.gov.uk/asbestos](http://www.hse.gov.uk/asbestos)) and provide further detail on the roles and responsibilities of those procuring surveys and Clients of construction projects.

Client Responsibilities	Applicability	Who is Accountable	Who is Responsible
For properties that were built prior to 2000, Refurbishment/Demolition (R/D) surveys should be procured by the Client, prior to any intrusive work or construction work commencing on the property. These Surveys will need to be coordinated with the property's Duty Holder for asbestos (the Property Management Team or tenant).	All projects	Project Executive/Director	Client Representative / Project Manager
Clients must only appoint competent surveyors to undertake asbestos surveys.	All projects	Project Executive/Director	Client Representative / Project Manager
The Client must ensure that adequate time and resources are made available to the surveyor to allow a thorough survey to be carried out.	All projects	Project Executive/Director	Client Representative / Project Manager
The Client will take on the responsibility of the CDM Client for all procured R/D surveys, as the survey is fully intrusive and as such is classed as construction work under the CDM Regulations.	All projects	Project Executive/Director	Client Representative / Project Manager
The Client should provide the Surveyor with the following information: Details of buildings or parts of the building to be surveyed; Details of the buildings use, processes, hazards, priority areas; Plans, documents, reports and surveys on design, structure and construction; Safety and security information (e.g. fire alarm testing, emergency procedures); Access arrangements and permits; Contacts for operational or health and safety issues.	All projects	Project Executive/Director	Client Representative / Project Manager
The Client is to ensure that all asbestos containing materials are removed, as far as is reasonably practicable before any refurbishment or demolition work takes place.	All projects	Project Executive/Director	Client Representative / Project Manager
The Client must provide the R/D Survey report to the Design Team, and Contractors who may be bidding for the work.	All projects	Project Executive/Director	Client Representative / Project Manager

Client Responsibilities	Applicability	Who is Accountable	Who is Responsible
The Client should provide a copy of the R&D Survey report to the Duty Holder such that their risk assessments and associated control procedures can be reviewed and updated based on the information provided.	All projects	Project Executive/Director	Client Representative / Project Manager
As an Employer, British Land must ensure adequate information, instruction and training is given to those employees that could come into contact with or be exposed to asbestos during the course of their work. This includes annual refresher training. <i>Refer to Section 6 with regards training.</i>	Annual training	Project Executive/Director	Line Managers

Note:

*The Client should procure the Surveys in accordance with the Control of Asbestos Regulations 2012 and associated guidance HSG 264 (Second edition), and ACoP L143 (Second edition) in advance of any construction work taking place.*

*Construction work includes any intrusive works to the structure (i.e. other intrusive surveys).*

*The Client should ensure that the specification for the R/D Survey accurately reflects the area and scope of the planned refurbishment or demolition works – there should be no restrictions on access unless the site is unsafe or access is physically impractical. Liaison with the Duty Holder is required.*

## 5. Management Team Responsibilities

The following highlights the health and safety responsibilities of British Land's development team. Details on the responsibilities of the Principal Designer, Designer and Principal Contractor can be found in the Appendices.

### British Land's Director responsible for Health & Safety:

- Provide clear leadership regarding the expectations of the business and its goals and objectives for health and safety performance;
- Ensure an appropriate construction health and safety policy and associated procedures are developed and that these reflect the wider health and safety requirements of the business;
- Establish an appropriate management structure to implement the construction health and safety policy throughout the company;
- Be aware of the appropriate statutory requirements affecting the construction operations of the company in respect of the key legislation such as the Management of Health and Safety at Work Regulations 1999, CDM Regulations 2015, Workplace (Health Safety & Welfare) Regulations 1992, and the Control of Asbestos Regulations 2012;
- Ensure that the health and safety roles and responsibilities across British Land are clearly defined and understood;
- Ensure that appropriate staff training is provided as necessary;
- Allocate sufficient resources to enable the construction health and safety policy to function effectively.

### British Land's Chair of the Development H&S Committee

- Provide clear leadership with regards the expectations of the business and its goals and objectives for construction health and safety performance;
- Implement and manage the construction health and safety policy throughout the company;
- Ensure the construction team is aware of its roles and responsibilities under the construction health and safety policy and their interfaces with other parts of the business;
- Arrange specialist corporate health and safety support for the development activities and ensure project specific Principal Designers and Principal Contractors appointments are put in place;
- Arrange and agree with the corporate construction health and safety advisor a health and safety assurance programme comprising of planned and random health and safety inspections during the design and construction phases of projects;
- Arrange and agree with the corporate construction health and safety advisor, annual reviews of the construction health and safety policy, or after significant legislative or company process change;
- Ensure lessons learnt are shared with the British Land development team and other parts of the business where relevant;
- Liaise with the Health and Safety Executive (HSE) at a strategic level.

### British Land's Project Directors/Executives

- Provide clear leadership to Project Teams with regards the expectations of the business and its goals and objectives for construction health and safety performance;
- Ensure that the Client duties and responsibilities are met for the planning and management of construction work;
- Ensure that relevant health and safety information is promptly provided to all directly appointed designers, contractors (including surveyors), Principal Designers and consultants (including project managers and cost managers) during tender stage and as projects progress;
- Ensure that health and safety is a continuous agenda item that is proactively discussed and reported against at relevant meetings and project reviews;
- Take part in any relevant forums and communicate with all relevant parties on health and safety matters;
- Ensure that any lessons learnt with regards health and safety matters are shared with the British Land

development team and fed back to British Land's Chair of the Development H&S Committee;

- Provide feedback to the Chair of the Development H&S Committee on any suggested updates or changes to British Land's construction health and safety policy and associated procedures.

### **Client's Representatives/Project Managers (usually external appointments)**

- Support the Client and Project Executive/Director in the fulfilment of their responsibilities in accordance with this Policy and associated health and safety legislation;
- Provide clear leadership to the Project Team, reflecting the expectations of the Client for health and safety performance;
- Ensure the Client and Project Team follow the various health and safety requirements laid down in British Land's Construction Health & Safety Policy;
- Ensure that capability<sup>3</sup> assessments are completed in relation to the appointment of the Principal Designer, Designers, Principal Contractor and the Contractors;
- Ensure the aspects within the Project Health & Safety Checklist is completed by the Principal Designer at each RIBA Plan Design & Construction Stage and checked by the Client Project Health & Safety Advisor;
- Ensure the Client is kept apprised of any key health and safety issues identified by the Principal Designer /Principal Contractor;
- Ensure that those under their control considered health and safety in their planning processes;
- Issue, on behalf of British Land, written approval of Principal Contractor's construction phase plan and provision of welfare facilities, to allow construction works to commence;
- Ensure that regular evidence is provided in relation to the project's health & safety compliance to the CDM Regulations and other health & safety legislation using the Project's Health & Safety Checklist as included at Appendix 3.

### **Corporate Construction Health and Safety Advisor**

- Work to achieve a positive and vigorous health and safety culture within British Land;
- Carry out specialist tasks, including system audits, performance monitoring, site inspections, competency assessments and research;
- Regularly review the Construction Health and Safety Policy and Procedures;
- Regularly update and inform British Land representatives on construction health and safety topics and HSE campaigns and forward any relevant health and safety communications that can assist in raising health and safety awareness within British Land;
- Assist British Land in engaging with the HSE as and when required;
- Carry out selected visits to British Land project sites to assess the performance of the Principal Contractor and report the findings to the Chair of the Development H&S Committee and Project Executives.
- Ensure that an occupational health programme is in place with all Principal Contractors for the benefit of all site staff and visitors.

### **Project Health and Safety Advisor**

- Work to achieve a positive and vigorous health and safety culture within British Land;
- Assist British Land to discharge their Client responsibilities under CDM;
- Provide support and advice on the management and delivery the British Land's health and safety arrangement for specific projects or programmes of works;
- Assist in establishing the required Client provided pre-construction information with the support of the Principal Designer and manage the retrieval of this information;
- If notification is required and the Principal Contractor is appointed, gather the information for the F10 and submit to the HSE on behalf of British Land. Amend and submit updates as required;
- At project level monitor the Principal Designer to reasonably ensure they are carrying out their duties and

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<sup>3</sup> Capability for the purposes of this policy is defined as the skills, knowledge, experience and (if an organisation) the organisational capability necessary to carry out those roles in a way that secures health and safety.

- report findings to British Land;
- For specific projects review and assess the Construction Phase Plan submitted and the proposed welfare facilities for adequacy and suitability for a start on site;
  - At project level monitor the Principal Contractor to reasonably ensure they are carrying out their duties and report findings to British Land;
  - For specific projects review the Health and Safety File to ensure it is complete.



## 5.1. The role of the Health and Safety Executive

British Land is committed to the maintenance of the highest standards of health and safety performance and compliance, working proactively with the HSE to help lead priority initiatives.

British Land will help to develop strategies and procedures that encourage the engagement of all its appointed duty holders (e.g. Designers and Contractors etc), consultants, and service providers to fully participate in HSE led campaigns. British Land will require assurance that all parties have integrated HSE key priorities into the management of their projects and will regularly monitor progress and achievements on such initiatives.

## 5.2. Summary of Duties

### Clients

Must make suitable arrangements for managing a project.

This includes making sure that:

- other duty holders are appointed with necessary skills, knowledge, experience etc.
- sufficient time and resources are allocated
- Notify the project to the enforcing authority where in writing, if the work is scheduled to last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project or exceed 500-person days.
- relevant pre-construction information is prepared and provided to other Duty Holders
- the Principal Designer and Principal Contractor carry out their duties
- suitable Welfare facilities are provided.
- agree the structure and content of the Health & Safety File with the Principal Designer and ensure it is handed over at the end of the project.

### Principal Designers

Plan, manage, monitor and co-ordinate health and safety in the preconstruction phase of a project. This includes:

- identifying, eliminating or reducing foreseeable risks
- ensuring Designers carry out their duties.
- Prepare and provide relevant information to other duty holders Liaise with the Principal Contractor to help in the planning, management, monitoring and co-ordination of the construction phase.
- Prepare and develop the Health & Safety File.

### Designers

When preparing or modifying designs, eliminate or reduce foreseeable risks that may arise during:

- construction
- the maintenance and use of a building once the project is completed.
- Provide information to other members of the project team to help them fulfil their duties.

### Principal Contractors

Plan, manage, monitor and co-ordinate the construction phase of a project. This includes:

- liaising with the Client and Principal Designer
- preparing the Construction Phase Plan and ensuring it is relevant during the project
- organising co-operation between Contractors and co-ordinating their work.

Ensure that:

- suitable site inductions are provided
- reasonable steps are taken to prevent unauthorised access
- workers are consulted and engaged in securing their health and safety

## Contractors

Plan, manage and monitor construction work under their control so that it is carried out without risks to health and safety.

For projects involving more than one Contractor, co-ordinate their activities with others in the project team – in particular, comply with directions given to them by the Principal Designer or Principal Contractor.

For single-contractor projects, prepare a Construction Phase Plan.

## Workers

They must:

- be consulted about matters which affect their health, safety and welfare
- take care of their own health and safety and that of others who may be affected by their actions
- report anything, they see which is likely to endanger either their own or others' health and safety
- co-operate with their employer, fellow workers, contractors and other duty holders. The company recognises and will undertake to comply with their duties as 'Principal Contractor' or 'Contractor' as applicable.



Further information on the roles and responsibilities of British Land under the relevant legislation for construction projects can be found on the HSE's website where there is access to legislation, approved codes of practice and associated guidance ([www.hse.gov.uk/construction](http://www.hse.gov.uk/construction)). In specific, the HSE document L153 Managing health and safety in Construction - Construction (Design and Management) Regulations 2015 - Guidance on Regulations.



## 6. Construction Health and Safety Arrangements and Procedures



The following pages set out British Land's health and safety and CDM arrangements and procedures in relation to the management and delivery of its construction projects.

Majority-of British Land's construction projects will follow the RIBA Stages through the planning, design and procurement process. The following arrangements and procedures have therefore been written to reflect the RIBA Plan of Design and Construction Work Stages 2013 (Stages 0 to 7) for ease of application.

Role and responsibilities of each of the CDM Duty holders are covered next under CDM Regulations 2015 Role and responsibilities:

Specific requirements of the Client, Principal Designers, Designers Principal Contractors and the Contractors is covered further in the Procedures

Further information on the RIBA Plan of Design and Construction Work Stages can be found on the RIBA website ([www.architecture.com](http://www.architecture.com)).

The following arrangements and procedures have been written to ensure British Land's Project Executives/Directors fulfils their responsibilities under British Land's Construction Health and Safety Policy and associated legislation.

It is expected that the Client's Representative/Project Manager supports the Project Executive/Director with the execution of their responsibilities and that the Client Project Health & Safety Advisor provides additional advice and support in relation to compliance with the CDM Regulations.



## 6.1. RIBA Stage 0 – Strategic Definition

### Health & Safety Requirements for British Land

RIBA Stage 0 is the stage at which a project is strategically appraised and defined before a detailed brief is developed. There are some high-level health & safety activities that should take place during Stage 0 in order to set the scene when the project moves forwards.

At this stage of a project, British Land expects its Project Executives and Directors to review the RIBA Stage 0 proposals and undertake the following:

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.1.1	Ensure that there is clarity in relation to who the CDM Client is for the project.	This is generally only required for projects where there is a Joint Venture Client.  One of the Clients can be nominated as CDM Client, but this nomination needs to be made in writing and clarified later on the F10 Notification (Only, when the PC is appointed).	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	Legal, Funders and Project Team	Project Health & Safety Advisor
6.1.2	Ensure that suitable resources will be allocated to all stages of the project to allow all parties to comply with their duties under relevant Health & Safety Legislation.	Resources include time, budget and information.  If appointed, the Principal Designer, Client Representative or Project Manager and the overall the Client Project Health & Safety Advisor should be able to Advise in relation to this requirement.	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.1.3	Establish whether the project is Notifiable under the CDM Regulations	<p>Construction projects are notifiable if the construction works are expected to last &gt; 30 working days and have more than 20 worker simultaneously at any time or &gt; 500 person days.</p> <p>If more than one Contractor will be working on the project a Principal Designer and a Principal Contractor must be notified in writing.</p> <p>If a project is borderline notifiable, then this can be discussed further with British Land's Corporate Construction Health &amp; Safety Advisor.</p>	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.1.4	Review the health and safety lessons learnt from previous projects and implement where possible on this project.	<p>It is suggested that the topic of Health &amp; Safety lessons learnt is included in a general lessons learnt session, so that other topics can be explored at the same time.</p> <p>This can be reviewed against previous British Land projects or in conjunction with the Project Team and their experiences of similar past projects.</p>	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.1.5	Consider what appointments will be required under the CDM Regulations	<p>This includes directly appointed Designers, Principal Designers, Contractors and Principal Contractor and a Project Health &amp; Safety Advisor, to Advise and carry out British Land's Client duties on their behalf.</p> <p>The Project Health &amp; Safety Advisor will require to be appointed as early as possible to assist on selection (procurement) of duty holders and existing pre- construction information. The Principal Designer will need to be appointed at Stage 1. The Principal Contractor must be appointed as soon as practicable after the Client knows enough about the project to be able to select a suitable party of this appointment – i.e. the Regulations encourage early Contractor involvement.</p>	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.1.6	Consider the timescales for the various appointments on the project	This particularly relates to the key roles such as the Design Team, Principal Designer and Principal Contractor.	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.1.7	Consider any Health & Safety KPIs that will need to be included as part of the procurement process.	<p>KPIs can be useful incentives to ensuring the Project Team follows the health and safety goals and objectives of British Land.</p> <p>Some examples of KPIs as recommended by Constructing Excellence – CCG KPIs for Industry. These should include:</p> <ul style="list-style-type: none"> <li>- Training and competency</li> <li>- Minimise impact on neighbours and local communities</li> <li>- Proactive and sensible risk management of all health and safety risks</li> <li>- No incidents</li> <li>- Respect for people</li> <li>- Maintain statutory compliance</li> </ul>	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.1.8	Identify any key or high-risk health and safety issues that could impact the project programme and/or cost.	<p>These could be identified through a due diligence process. Examples could include:</p> <ul style="list-style-type: none"> <li>● the presence of high quantities of asbestos within the building which would require careful planning with regards surveys and eventual removal/ remediation,</li> <li>● the potential for unexploded ordnance which could require on-site monitoring during ground works, contaminated ground, or</li> <li>● the need to employ specific Health &amp; Safety related expertise</li> </ul>	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.1.9	Consider the lead in times for key Health & Safety related activities.	<p>Lead in times for key Health &amp; Safety activities could include:</p> <ul style="list-style-type: none"> <li>intrusive surveys (refurbishment/<del>and</del> demolition asbestos surveys, structural surveys);</li> <li>the time to be provided to the Principal Contractor (and other directly appointed Contractors) between appointment and commencement of construction work on site;</li> <li>asbestos removal works (there is a 2 week notification period to the HSE prior to works commencing).</li> </ul>	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.1.10	Gather pre-construction information in readiness for handover to the Principal Designer and Project Team in Stage 1	Pre-construction information that might be available at this Stage includes historic drawings, old plans, fire risk assessments, asbestos management plans, Health & Safety Files, O&M manuals etc.	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor	Principal Designer & Project Team	Project Health & Safety Advisor





## 6.2. RIBA Stage 1 – Preparation & Brief

### Health & Safety Requirements for British Land

RIBA Stage 1 is the stage at which a detailed brief is prepared for the project with the Client. At this point it is important to define what the British Land’s key health and safety objectives and goals are going to be for the project, start making the key health & safety/CDM appointments, and start providing and reviewing pre- construction information.

At this stage of a Project, British Land expects its Project Executives and Project Directors with support from the appointed Project Safety Advisor and Client Representative/ Project Manager, to undertake the following:

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.2.1	Set out British Land’s health and safety goals and objectives for the project and any additional health and safety requirements, for inclusion in the Project Execution Plan (PEP).	There is a legal requirement under the CDM Regulations for Clients to produce project specific health and safety management arrangements for its construction projects. See Appendix 2 for the content of these arrangements. By including this information in the PEP, there is no duplication and information is held in the main document for the project. The Project Health & Safety Advisor will be able to support the Client in the preparation of these arrangements.	BL Executive/ Director	Client Representative/ Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.2.2	Ensure that clear roles and responsibilities are understood across the Project (such as CDM Duty Holders and Asbestos Duty Holders) and that details are included in the Client Management Arrangements (included in the Project Execution Plan).	The Project Health & Safety Advisor can assist the Client in the development of their Health & Safety Management Arrangements for the Project.	BL Executive /Director	Client Representative/ Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.2.3	Appoint the Principal Designer as soon as is practicable within Stage 1.	A Principal Designer must be appointed (in writing) for all projects with more than one Contractor. If a Principal Designer is not appointed, the Client will automatically take on the duties and responsibilities of the Principal Designer and must be able to demonstrate capability to act in this role. Under the CDM Regulations, the Principal Designer must be appointed, as soon as practicable after start of the design, but before detailed design work has commenced (i.e. before the start of RIBA Stage 2).	BL Executive/ Director	Client Representative/ Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.2.4	Ensure all directly appointed Designers, Contractors (for any surveys) and the Principal Designer are capable and adequately resourced as per British Land Requirements and required general duties of the CDM Regulations.	The Project Health & Safety Advisor, if requested, will be able to assess capability on behalf of the Client. The Principal Designer should be able to demonstrate capability if requested by the Client. British Land will accept Building Confidence or SSIP accreditation (the HSE's Safety Scheme in Procurement) which confirms the capability of a company under the CDM Regulations. Under the CDM Regulations, Designer, Principal Designers and Contractors should not accept appointments unless they are capable to undertake the work. <b>British Land may appoint international designers that are not aware of their duties under CDM, but in doing so British Land are responsible to ensure that the designer is compliant with the regulations.</b>	BL Executive /Director	Client Representative/ Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.2.6	Establish methods to ensure any structure that is designed as a workplace complies with the requirements of the Workplace (Health, Safety & Welfare) Regulations.	Most of the requirements of the Workplace Regulations tend to be covered by Building Regulations and British Standards. However, there can be a few anomalies which need to be addressed. It is a Client duty and a designer duty (under the CDM Regulations) to ensure the design complies with the Workplace Regs. An appropriate method to ensure this compliance should be established for the project.	BL Executive /Director	Client Representative/ Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.2.7	In conjunction with the Property Management Team, establish what pre-construction information is available and promptly hand this to the Principal Designer and Project Team	Pre-construction information can include: existing drawings structural surveys condition surveys live utility services fire risk assessments UXO Surveys property risk assessments asbestos management plans previous Health & Safety File(s) O&M manuals for existing equipment This information will be obtainable from British Land's Property Management Team, in most instances.	BL Executive /Director	Client Representative/ Project Manager	Project Health & Safety Advisor BL Property Management Team Where applicable Tenants	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.2.8	Commence the procurement of surveys that may be required to establish the missing pre-construction information, in accordance with the advice from the Principal Designer and the Project Team.	The Principal Designer and Project Team will advise on the additional information required and the surveys that will need to be procured to establish this information. Please see Appendix 1 with regards to the procurement of Refurbishment and Demolition (R/D) Asbestos Surveys.	BL Executive /Director	Client Representative/ Project Manager	Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.2.9	Identify the requirement for a Refurbishment and Demolition (R&D) Asbestos Survey and liaise accordingly with the Asbestos Duty Holder for the property (usually British Land's Property Management Team or tenant) prior to commencing procurement.	Please see Appendix 1 with regards to the procurement of Refurbishment and Demolition (R/D) Asbestos Surveys. Instruct the Duty Holder to procure an R/D survey (if vacant possession or partial vacant possession is available). Ensure that there is adequate liaison between the Designers and the Duty Holder such that an appropriate specification for the R/D survey is developed. The greater the clarity on what parts of the structure/ property are to be affected by the future works can be provided to the asbestos surveyor, the greater the certainty with regards to the resultant survey report.	BL Executive /Director	Client Representative/ Project Manager	Project Health & Safety Advisor Property Management Team	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.2.10	Ensure that all Surveyors are procured and managed in accordance with the requirement of the Management of Health and Safety at Work Regulations (visual and intrusive surveys) and CDM Regulations (for intrusive surveys).	<p>British Land must ensure the health, safety and wellbeing of all those working in or visiting its premises – through risk assessment and implementing appropriate controls and procedures. British Land must provide contractors (those employed to work for the Client) information on: the health and safety risks they may face</p> <p>the measures in place to deal with those hazards and risks</p> <p>how to follow any emergency procedures</p> <p>This relates to when British Land requires the Project Team, surveyors or others to undertake work in the premises that is being considered for the project – e.g. walk arounds, visual inspections/surveys, intrusive surveys.</p> <p>Where the property is managed by British Land, the risk assessment and appropriate controls and procedures will have been undertaken and implemented by British Land’s property management team.</p> <p>Those visiting the property should comply with the procedures provided to them. If the procedures are not provided, then the visitors have the right to request this information.</p> <p>For cases where visual or intrusive surveys are to be undertaken, British Land’s property management team should review their risk assessments to ensure that the control measures and procedures in place are appropriate to the tasks to be undertaken.</p> <p>A checklist of matters to consider when visiting a property is included at Appendix 8.</p>	BL Executive/ Director	Client Representative /Project Manager	Project Health & Safety Advisor Property Management Team	BL Executive/Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.2.11	Following advice from the Project Health & Safety Advisor, Principal Designer and Project Team, schedule the necessary surveys into the project programme.	<p>This should include visual and intrusive surveys and any lead-in times or procurement requirements.</p> <p>R/D Asbestos surveys will require detailed specifications to be drawn up prior to tender process. These specifications will require an appropriate amount of time to be drafted by the Project Team.</p> <p>Please see Appendix 1 with regards to the procurement of Refurbishment and Demolition (R/D) Asbestos Surveys.</p>	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor, Principal Designer and Project Team	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.2.12	Request from the Principal Designer any anticipated Health & Safety issues that may have a bearing on the Planning Application and/or Planning Restrictions	<p>Examples include:</p> <ul style="list-style-type: none"> <li>the need for roof parapets to allow for regular roof access;</li> <li>façade cleaning and maintenance requirements;</li> <li>disabled access for listed buildings;</li> <li>location of future site set-up/ lay down areas;</li> <li>construction vehicle access</li> </ul>	BL Executive /Director Client Representative /Project Manager	Principal Designer	Project Health & Safety Advisor and Project Team	BL Executive/Director & Project Team	Project Health & Safety Advisor
6.2.13	Address the above issues with the Project Team where required to minimise any future issues.	Lack of early consideration to items such as those listed above, can have a financial or programme impact on the project during the construction phase and end use.	BL Executive /Director	Client Representative /Project Manager	Project Health & Safety Advisor, Principal Designer and Project Team	BL Executive/Director & Project Team	Project Health & Safety Advisor



### 6.3. RIBA Stage 2 – Concept Design

#### Health & Safety Requirements for British Land

RIBA Stage 2 is the stage at which Concept Design commences in line with the requirements of the initial project brief.

At this point it is important to set the scene and British Land’s expectations with regards to the management and communication of health and safety on the project and embed the key roles and responsibilities.

At this stage of a Project, British Land expects its Project Executives and Directors, with support from the appointed Client Representative/Project Manager, to undertake the following:

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.3.1	Be aware of taking on Designer responsibilities during the development of the project brief.	Construction Clients can inadvertently take on the responsibilities of Designers under the CDM Regulations by stipulating certain design requirements in the project brief. The Project Health & Safety Advisor can Advise the Client with regards to taking on these responsibilities. The Principal Designer is responsible to ensure the principles of prevention are applied as reasonably practicable.	Project Executive /Project Director	Principal Designer and Designers	Client Project H&S Advisor	All the Designers, Client Representative/ Project Manager Client Project H&S Advisor	Client Project H&S Advisor
6.3.2	Assess if required based on the complexity of the project and likely risks, if a Health & Safety Workshop is required. If so to be held and run by the Principal Designer to implement with assistance and technical input by the Project Health & Safety Advisor during the Concept Design Stage to establish the knowledge across the team and commence the development of the project’s Health & Safety Design Log or Register	See Section 5 for further information on the management of health and safety design-risks during the planning and design stage.	Project Executive /Project Director and Client Representative/ Project Manager	Principal Designer	Client Project H&S Advisor	All the Designers and Project Team	Client Project H&S Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.3.3	Following the Stage 2 Health & Safety Workshop, request from the Principal Designer the Health & Safety design-risks that could have a bearing on the Planning Application and/or Planning Restrictions. Address the significant risks with the Project Team where required with support of the Client Project Health & Safety Advisor.	Items that could have a potential impact on planning include: the need for roof parapets to allow for regular roof access (principles of prevention and hierarchy of risk control); façade cleaning and maintenance requirements; disabled access for listed buildings; location of future site set-up/ lay down areas; construction vehicle access	Project Executive /Project Director	Client Representative/ Project Manager, Principal Designer Principal Designer and Designers	Client Representative/ Project Manager, Designers and Client Project H&S Advisor	All the Designers and Project Team	Client Project H&S Advisor
6.3.4	The Principal Designer is to ensure the Project Team is providing regular information on the key Health & Safety risks associated with the Project – particularly in the Stage 2 report.	The Project Team is required to co-ordinate and co-operate with regards to the provision of information. See Section 5 regarding the use of the Project Health & Safety design-risks Register.	Project Executive /Project Director and Client Representative/ Project Manager	Principal Designer	Client Representative/ Project Manager, Designers and Client Project H&S Advisor	All the Designers and Project Team	Client Project H&S Advisor
6.3.5	Seek confirmation from the Design Team that the structure (when designed as a workplace) complies with the Workplace (Health, Safety and Welfare) Regulations.	There is a duty under the CDM Regs to ensure that the design is compliant with the Workplace (Health, Safety and Welfare) Regulations.	Project Executive /Project Director and Client Representative/ Project Manager	Principal Designer and Designers	Client Representative/ Project Manager, Designers and Client Project H&S Advisor	All the Designers and Project Team	Client Project H&S Advisor





Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.3.6	<p>Promptly provide the Principal Designer with information relating to the Health &amp; Safety File.</p> <p>From appointed surveyors, Designers, Principal Contractor and their Sub-Contractors.</p>	<p>This includes details on the format required, timescales for completion, roles and responsibilities with regards to its collation, compilation and review, and information to be provided.</p> <p>Only one Health &amp; Safety File should be produced per building/structure.</p> <p>This is required so that it can be included in the Pre-Construction information such that the Project Team and the Principal Contractor are aware of the requirements on them for the provision of information for the File.</p> <p>Following details from existing information and surveys found, including details from the designers. It is usual for the Principal Contractor to collate and compile details and information from the subcontractors for the Health &amp; Safety File prior to handover to the Principal Designer for final review and issue to the Client.</p>	Project Executive /Project Director and Client Representative/ Project Manager	Principal Designer	Client Representative/ Project Manager, Designers and Client Project H&S Advisor	All the Designers and Project Team	Client Project H&S Advisor
6.3.7	<p>Continue the procurement of Surveys to establish missing information in accordance with the advice from the Project Team and Client Project Health &amp; Safety Advisor and the Principal Designer and request from the Principal Designer details of any Health &amp; Safety issues risks that have been identified during the surveys.</p>	<p>Refer to Section 3 with regards to British Land's responsibilities during the procurement and management of surveys (visual and intrusive).</p> <p>The Client Project Health &amp; Safety Advisor will be able to Advise the Client on how to manage the procurement of visual and intrusive surveys to ensure compliance with the Management of Health and Safety at Work Regulations and the CDM Regulations.</p> <p>The Principal Designer should include details of any Health &amp; Safety risks identified in the surveys in the Pre-construction information and the Health &amp; Safety design-risks Register where further actions are required.</p>	Project Executive /Project Director	Client Representative/ Project Manager	Principal Designer, Designers and Client Project H&S Advisor	Client Project H&S Advisor, Principal Designer, all the Designers and Project Team	Client Project H&S Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.3.8	Commence the procurement of the Principal Contractor, as soon as practicable after the Client has enough knowledge about the project to be able to select a suitable and capable party for this role.	The Client should provide a set of pre-construction information as part of the tender documents and can support with the review of the tenders by reviewing capability assessment returns and attending tender interviews. Involving Advice and support from the Project Health & Safety Advisor.	Project Executive /Project Director	Client Representative/ Project Manager	Client Project H&S Advisor,	Client Project H&S Advisor, Principal Designer, all the Designers and Project Team	Client Project H&S Advisor
6.3.9	Ensure the Principal Contractor is capable in this role, as required by British Land with support of the Client Project H&S Advisor.	British Land will accept Building Confidence or another SSIP <sup>4</sup> accreditation with addition of their last 3 to 5 years accidents, prosecutions, FFIs and those pending. as confirmation of capability under the CDM Regulations.	Project Executive /Project Director	Client Representative/ Project Manager	Client Project H&S Advisor, Project Executive/Project Director	Client Project H&S Advisor, Principal Designer, all the Designers and Project Team	Client Project H&S Advisor
6.3.10	Ensure an outline Cleaning & Maintenance strategy is prepared in advance of Planning Application to ensure any key health and safety issues are addressed prior to application submission.	It is important to have an idea of the cleaning and maintenance requirements of a building prior to planning application. Items that should be considered Include window access and replacement, roof plant access and replacement, routes in and out of the building/property for any specialist equipment (i.e. scissor lifts, MEWPs etc.) Planning application can put constraints on a building's design which can have implications for the detailed design and end use with regards the cleaning and maintenance strategy.	Project Executive /Project Director and Client Representative/ Project Manager	Principal Designer and Designers	Client Project H&S Advisor and BL Property Management Team	Client Project H&S Advisor, Principal Designer, all the Designers and Project Team	Client Project H&S Advisor

<sup>4</sup> SSIP relates to the HSE's Safety Schemes in Procurement accreditation process, where various capability organisations have agreed to assess capability to the agreed standards.



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Control	Information	Advice
6.3.11	Request a copy of the Initial F10 Notification from the Project Health & Safety Advisor for British Land's records (Only if Principal Contractor has been appointed and project details are approximate).	The Project Health & Safety Advisor will be able to provide a PDF copy of the online F10 Notification for upload to Credit360 BL's Office 365 SharePoint.	BL Executive/ Director and Client Representative /Project Manager	Project Health & Safety Advisor,	Principal Contractor, Principal Designer and Project Team	BL Executive/ Director & Project Team	Project Health & Safety Advisor



## 6.4. RIBA Stage 3 – Developed Design

### Health & Safety Requirements for British Land

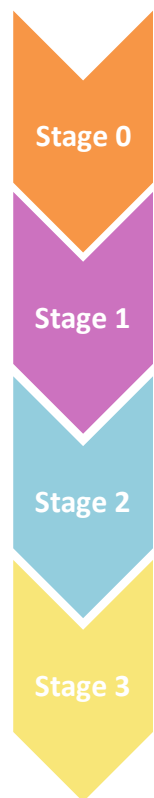
During this RIBA Stage, the concept design is further developed and progressed until the spatial co-ordination exercises have been completed.

The project strategies are also further developed and signed off by the Client. The Design Change control process is also usually implemented during this phase so further changes can be controlled and monitored.

On some projects, Stage 3 also represents the commencement of Principal Contractor procurement.

At this stage of a Project, British Land expects its Project Executives and Directors, with support from the appointed Client Representative/Project Manager, to undertake the following:

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.4.1	The Principal Designer is to ensure the Project Team is providing regular information on the key health and safety risks associated with the project and included in the Stage 3 Client Report.	As the design develops it becomes more important to ascertain and understand the health and safety risks that will need to be 'passed-on' and managed by the Principal Contractor and end user. The more developed the design, the greater the fixity and less opportunity to change the design to reduce risk. This information will need to be included in the Pre-Construction Information that forms part of the tender documents, such that any key issues can be appropriately priced for and plans implemented for their management and control.	BL Executive/ Director and Client Representative/ Project Manager	Principal Designer	Designers, Project team, Principal Contractor (if appointed) and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.2	Ensure Health & Safety is given due consideration during any Value Engineering exercises.	Value Engineering exercises are often undertaken to challenge the cost or programme implications of certain design decisions. As part of this process, other aspects should also be considered including health, safety and environmental/ sustainability effects. Where requested, the Principal Designer should be present at these Value Engineering workshops such that any	BL Executive/ Director	BL Executive/ Director and Client Representative/ Project Manager	Principal Designer, Principal Contractor (if appointed), Designers and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
		health and safety implications of design changes can be recorded on the Project Health & Safety Designer Risk Register					
6.4.3	Seek confirmation from the Design Team that the structure (when designed as a workplace) remains compliant with the requirements of the Workplace (Health, Safety and Welfare) Regulations.	The Principal Designer should provide clear confirmation that they are checking the Designers are complying with their duties. This confirmation should be in writing, or included in the Stage 3 Client Report.	BL Executive/ Director and Client Representative/ Project Manager	Principal Designer	Principal Contractor (if appointed), Designers and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.4	If required, ensure that a Health & Safety Workshop is held and run by the Principal Designer during Developed Design stage to establish the main Health & Safety issues on the project	Updating the Design Risk Register and flagging any additional significant residual risks for buildability, cleaning and maintenance and safe use of the building/facility/structure.	BL Executive/ Director and Client Representative/ Project Manager	Principal Designer	Designers, Principal Contractor (if appointed), and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.5	Ensure the Access & Maintenance Strategy is completed by the Design Team (with particular regard to Health and Safety Designer Risk Register and assumptions).	A detailed Access & Maintenance Strategy at this stage will help ensure some certainty with regards any associated health and safety issues and costs associated with the purchasing or hiring of specialist equipment.	BL Executive /Director and Client Representative/ Project Manager	Principal Designer	Principal Contractor (if appointed), Project Health & Safety Advisor and BL Property Management	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.6	Ensure the Plant Replacement and Removal Strategy is completed by the Design Team (with particular regard to Health and Safety Designer Risk Register and assumptions).	A detailed Plant Replacement and Removal Strategy at this stage will help ensure some certainty with regards any associated health and safety issues and costs associated with the purchasing or hiring of specialist equipment.	BL Executive /Director and Client Representative/ Project Manager	Principal Designer	Principal Contractor (if appointed), Project Health & Safety Advisor and BL Property Management	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.7	Consider the time to be provided to the Principal Contractor for and incl. any separate minor works or enabling/demolition works from his appointment to start of work on site.	The Client must allow sufficient time to allow the planning for the construction works on site. This timescale which includes all planning and preparation, as well as any minor the construction phase has to be notified to the HSE via the F10 Notification process (If PC is appointed).	BL Executive/ Director	BL Executive/ Director	Principal Contractor (if appointed) and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.4.8	Ensure that any construction works does not commence unless the Principal Contractor has prepared and adequate construction phase plan and that adequate welfare facilities will be provided at the commencement of work on site.	The Project Executive/ Director & Project Manager should seek assurance from the Project Health & Safety Advisor that an adequate Construction Phase Plan is in place and that the Welfare facilities will be suitable.	BL Executive/ Director and Principal Contractor	Client Representative/ Project Manager and Principal Contractor (if appointed)	Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.9	Provide comment and feedback on the significant risks highlighted in the project's Health & Safety Design Risk Register	British Land's Project Executives/Project Manager need to continually demonstrate their commitment to Health & Safety Management on the project. Providing regular feedback on the Health & Safety Designer Risk Register will support British Land with this objective and will encourage the Project Team to follow suit.	Principal Designer	Principal Designer	Designers, Principal Contractor (if appointed) and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.10	Ensure the Stage 3 Client report contains information relating to the health and safety management of the project	This should come from the Client Project Health & Safety Advisor and include a commentary on the key Health & Safety-Design Risks that have been identified with input from the Principal Designer and what the Project Team is doing to close these issues out.	BL Executive/ Director	Client Representative/ Project Manager and Principal Designer	Project Team and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.11	Ensure the Stage 3 PD report contains information relating to the health and safety management of the project	This should come from the Principal Designer and include a commentary on the key Health & Safety-Design Risks that have been identified and what the Project Team is doing to close these issues out.	BL Executive/ Director	Principal Designer	Designers, Principal Contractor (if appointed) and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.4.12	Instruct the corporate Health & Safety Advisor to undertake a Design Audit Review, if required.	Instruction to be based on the complexity or risks involved on the project. Where new organisations are engaged. If spot Audit Reviews are required.	BL Executive/ Director	Client Representative/ Project Manager and Project Health & Safety Advisor	Principal Designer and Designers and Principal Contractor (if appointed)	BL Executive/ Director, Designers & Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.4.13	If applicable, request a copy of the Initial F10 Notification from the Project Health & Safety Advisor for British Land's records (Only if Principal Contractor has been appointed and project details are approximate).	The Project Health & Safety Advisor will be able to provide a PDF copy of the online F10 Notification for upload to BL's Office 365 SharePoint.	BL Executive/ Director	Client Representative/ Project Manager and Project Health & Safety Advisor	Principal Designer and Designers and Principal Contractor (if appointed)	BL Executive/ Director & Project Team, Principal Designer and Designers and Principal Contractor (if appointed)	Project Health & Safety Advisor



## 6.5. RIBA Stage 4 – Technical Design Health & Safety Requirements

RIBA Stage 4 is the stage at which the architectural, structural and building services designs are further refined to provide technical definition of the project and the design work of specialist contractors is developed and concluded.

By the end of this stage, all aspects of the design will be completed, apart from minor queries arising from the site during the construction stage. In many projects, Stages 4 and 5 work concurrently – particularly the sub-contractor design aspects.

At this stage of a Project, British Land expects its Project Executives and Directors, with support from the appointed Client Representative/Project Manager, to undertake the following:

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.5.1	Ensure Health & Safety significant risks are given due consideration during the Design Change Control Process.	Not all the Change Control forms that the Principal Contractors use have a section querying the Health & Safety implications of any changes. In order to make sure Health & Safety is given due consideration during the design change process, British Land should request that the forms contain a Health & Safety box.	BL Executive/ Director and Client Representative/ Project Manager	Principal Designer	Designers and Principal Contractor (if appointed) and Project Health & Safety Advisor	BL Executive/ Director, Designers Contractor (if appointed) and Project Health & Safety Advisor	Project Health & Safety Advisor
6.5.2	Ensure the Principal Designer is provided with copies of the Design Change Forms where there are potential health and safety implications.	Further to the above, any design changes that have identified as potential Health & Safety significant risks should be forwarded to the Principal Designer for comment or information. The Design Change Control Process should include the Principal Designer in the distribution list.	BL Executive/ Director and Client Representative/ Project Manager	Client Representative/ Project Manager	Principal Designer and Designers and Principal Contractor (if appointed)	BL Executive/ Director & Project Team, Principal Designer and Designers and Principal Contractor (if appointed)	Project Health & Safety Advisor
6.5.3	Continue to provide comment and feedback on the key issues highlighted in the project's Health & Safety Design Risk Register.	British Land's Project Executives/Directors need to continually demonstrate their commitment to Health & Safety management on the project. Providing regular feedback on the Health & Safety Design Risk Register will support British Land with this objective and will encourage the Project Team to follow suit.	BL Executive/ Director and Client Representative/ Project Manager	Principal Designer	Designers and Principal Contractor (if appointed) and Project Health & Safety Advisor	BL Executive/ Director, Designers & Project Team	Project Health & Safety Advisor





Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.5.4	The F10 Notification is completed online via the HSE website.	The F10 Notification is completed online via the HSE Website  The Project Health & Safety Advisor should be requested to complete this form on the Client's behalf, if the PC is appointed for the Main works.	BL Executive /Director and Client Representative/ Project Manager	Project Health & Safety Advisor	Principal Contractor (if appointed), Principal Designer and Designers	BL Executive /Director, Client Representative/ Project Manager Principal Contractor (if appointed) & Project Team	Project Health & Safety Advisor
6.5.5	Ensure the Stage 4 Client report contains information relating to the health and safety management of the project	This should come from the Client Project Health & Safety Adviser and include a commentary on the key Health & Safety-Design Risks that have been identified with input from the Principal Designer and what the Project Team is doing to close these issues out.	BL Executive /Director Client, Representative/ Project Manager	Principal Designer and Designers	Designers and Principal Contractor (if appointed) and Project Health & Safety Advisor	BL Executive/Director & Project Team	Project Health & Safety Advisor



## 6.6. RIBA Stage 5 – Construction Health & Safety Requirements

RIBA Stage 5 is the stage at which the building/ structure is constructed on site in accordance with the construction programme. Construction includes the erection of components that have been fabricated off site.

The information output from this stage is ‘As Constructed’ information.

At this stage of a Project, British Land expects its Project Executives and Directors, with support from the appointed Client Representative/Project Manager, to undertake the following:

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.6.1	Ensure Duty Holder responsibilities are clear and notified in writing prior to the start of the Construction Phase.	With regards to the CDM Regulations, there should be written appointment of the Principal Contractor and Principal Designer on projects with more the one contractor. With regards to the Control of Asbestos Regulations, there should be written confirmation that the Principal Contractor will take on the role of asbestos Duty Holder upon acquisition of the site (for the parts of the site/building with which he has control).	BL Executive /Director	Client Representative/ Project Manager	Principal Contractor, Principal Designer and Project Health & Safety Advisor	BL Executive/ Director & Project Team	Project Health & Safety Advisor
6.6.2	Confirm in writing to the Principal Contractor that they can commence work on site following the successful review of their initial Construction Phase Plan and Welfare Arrangements	The Project Health & Safety Advisor will Advise British Land as to the adequacy of the Principal Contractor’s Construction Phase Plan and arrangements for Welfare facilities.	BL Executive /Director	Client Representative/ Project Manager and Project Health & Safety Advisor	Principal Contractor	BL Executive /Director & Project Team	Project Health & Safety Advisor
6.6.3	Where required, instruct the Corporate Construction Health & Safety Advisor or Project Health & Safety Advisor to undertake an audit of the construction works on the site.	The frequency of these audits may vary from project to project depending on the performance of the Principal Contractor	BL Executive /Director	Client Representative/ Project Manager	Corporate Construction Health & Safety Advisor or Project Health & Safety Advisor	BL Executive/ Director, Principal Contractor, Principal Designer & Project Team	Corporate Construction Health & Safety Advisor or Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.6.4	Review the accident and incident statistics that are provided by the Principal Contractor each month.	<p>It is a British Land requirement that the Principal Contractor provides a monthly update of the incident and accidents on its site.</p> <p>The information should be reviewed with the Principal Contractor (PC) on a monthly basis and statistics will be compared against other British Land projects.</p> <p>The PC should report any RIDDOR accident or incident within a timescale stated in the latest Accident and Incident Reporting arrangements and Procedure.</p> <p>Informing the Project Health &amp; Safety Advisor ASAP.</p>	BL Executive /Director	Client Representative/ Project Manager and Principal Contractor	Project Health & Safety Advisor	Project Health & Safety Advisor and Project Team ASAP.	Project Health & Safety Advisor



## 6.7. RIBA Stage 6 – Handover & Close Out Health & Safety Requirements

The Project Team’s priorities during this Stage will be facilitating the successful handover of the building/ structure in line with the project programme, concluding all aspects of the building contract, including the inspection of defects as they are rectified and the production of certificates/ sign-offs.

At this stage of a Project, British Land expects its Project Executives and Directors, with support from the appointed Client Representative/Project Manager, to undertake the following:

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.7.1	Ensure that the transfer of Duty Holder responsibilities is clear.	British Land needs to ensure there is a clear transfer of the Duty Holder responsibilities. This will include the hand back of the asbestos Duty Holder role from the Principal Contractor back to British Land’s property management team, and the clear cessation of the role of Principal Contractor such that work areas become the responsibility of British Land’s property management team to manage.	BL Executive /Director	BL Executive /Director and Client Representative/ Project Manager	Principal Designer, Designers and Principal Contractor where applicable and Project Health & Safety Advisor	Project Health & Safety Advisor and Project Team ASAP.	Project Health & Safety Advisor
6.7.2	Receive the completed Health & Safety File upon practical completion	This should be provided to the Client by the Principal Designer or the Principal Contractor if the design had finished prior to the completion of Stage 5.	BL Executive/ Director	Principal Designer	Principal Designer in liaison with the Principal Contractor and BL Property Management	Project Health & Safety Advisor and Project Team ASAP.	Project Health & Safety Advisor
6.7.3	Check the residual Health & Safety issues are captured in the Health & Safety file prior to handover to British Land’s property management team.	The Principal Designer will undertake the main review of the Health & Safety File. If the Principal Designer’s appointment has come to end before the project completion, the Principal Contractor will complete the Health & Safety file. The Project Executive should also review the file to ensure that it fulfils British Land’s requirements.	BL Executive /Director	Principal Designer	Principal Designer in liaison with the Principal Contractor and BL Property Management	Project Health & Safety Advisor and Project Team	Project Health & Safety Advisor



Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.7.4	Pass the Health & Safety File onto British Land's property management team.	Either the Client Representative/Project Manager or the Principal Designer provides this onto the BL property Management Team following a review.	Client Representative/Project Manager with the Principal Designer	Principal Designer	Principal Designer in liaison with the Principal Contractor and BL Property Management	Project Health & Safety Advisor and Project Team	Project Health & Safety Advisor
6.7.5	Capture any lessons learnt from the project.	This should be done in conjunction with the Project Team and the lessons learnt fed back to British Land's Head of Construction.	BL Executive/Director	Client Representative/Project Manager with Principal Designer, Designers and Principal Contractor	Principal Designer in liaison with the Designers and the Principal Contractor, incl. Project Health & Safety Advisor	Project Health & Safety Advisor and Project Team	Project Health & Safety Advisor



## 6.8. RIBA Stage 7 – In Use

### Health & Safety Requirements for British Land

Whilst it is likely that many of the handover duties will be completed by the end of RIBA Stage 6, certain activities may be required afterwards.

Item	Health & Safety Requirements	Guidance	Accountability	Responsibility	Consult	Information	Advice
6.8.1	Retain and provide access to the Health & Safety File by those that need it.	The Health & Safety File will be passed to British Land’s Property Management Team post completion, but they have a duty to provide access to the information should any future works to the building/property be required.	BL Property Management	BL Property Management	Tenants, Project Health & Safety Advisor and BL Property Management H&S Advisor	Tenants, Project Health & Safety Advisor and BL Property Management H&S Advisor	Property Management H&S Advisor
6.8.2	Ensure the Health & Safety File is revised with information from new projects.	The Project Executive/Director for any new projects on the building will need to make sure that the existing Health & Safety File is updated to reflect these works.	BL Executive /Director	Client Representative/ Project Manager with Principal Designer, Designers (if applicable) and Principal Contractor or Contractor	Principal Designer (if applicable) in liaison with the Designers and the Principal Contractor or Contractor and Project Health & Safety Advisor	Project Health & Safety Advisor and Project Team	Project Health & Safety Advisor

## 7. Managing Health & Safety issues during the 'Design & Planning' stages

A successful project will have clear Client leadership and a proactive team that regularly co-ordinates and communicates project information (not just health & safety information) for the benefit of the wider Project Team, the Principal Designer, Designers, Principal Contractor and project's stakeholders.

When it comes to health and safety, everyone involved in a construction project has a duty to communicate, co-operate and co-ordinate with regards to the provision of health and safety information.

Most organisations will usually have their own internal procedures and management arrangements to comply with this requirement and these will have been checked as part of their general duties under the CDM Regulations.

Designers also have a duty to assess and review their designs to ensure that they are avoiding and mitigating health and safety risks wherever they can.

British Land recognises that a team approach to health and safety is therefore required and as such, expects the Project Team to engage in the following key activities.

### 7.1. 'Design & Planning' Health & Safety Workshops

The Principal Designer with support from the Project Health & Safety Advisor and British Land's Project Executives, will be expected to set up and chair a Health & Safety Workshop during Stage 2 (and Stage 3 if required).

The Workshop should aim to achieve the following:

- A review of the existing constraints and issues with regards to the property that could have a bearing on Health & Safety during design, construction and end use (this exercise will support the Principal Designer gathering of pre-construction information);
- A review of pre-construction information currently available for the property and the identification of what additional information is required;
- The identification of key health and safety issues during the construction phase (including any demolition or enabling works) and the end use (including operation, maintenance, cleaning and any future demolitions or alterations) that need further resolution, design development or eventual management by the Principal Contractor/end user;
- The identification of responsibilities and priorities against the significant risks raised;
- Provide an introduction to the project's Health & Safety Design Risk Register and the next steps for its review and update.

## 7.2. Health & Safety Design Risk Register

From the above Workshop(s) the Principal Designer will be able to pull together and populate the project's Health & Safety Design Risk Register.

The reason this is called a Design Risk Register, rather than an Issues Register, is that not all of the items within the Design Risk Register can be easily expressed as a significant residual design risk. For example, one of the design risks which may be recorded is that further investigation is required to ascertain the presence of underground voids around the curtilage of the building.

The Principal Designer will be responsible for the maintenance and update of the Design Risk Register through regular reviews and feedback from all the Designers and the Project Team.

See Appendix 4 for an example Design Risk Register, but the Principal Designer may wish to use their own version that is equal or better.

The Project Team will be expected to regularly feedback any changes on the Design Risk Register to the Principal Designer who will maintain and track the master copy. The Principal Designer will regularly issue the latest version of the register to the team.

In addition, the Designer will be required to populate and provide the Health & Safety Design Risk Register with the key health and safety significant risks identified within their design via their design risk log/register/schedule or tracker (see below). This enables the rest of the team to have visibility and the potential to provide input or suggestions for reducing the risk further.

## 7.3. Designer Risk Management

One of the fundamental requirements under the CDM Regulations is that Designers must consider health and safety to ensure safe and healthy buildability, operability and maintainability of the end structures/buildings, including future deconstruction in their design.

In doing so, Designers should:

- Identify hazards associated with particular elements of their design which can generate risks during construction, maintenance and use of premises and/or facilities (unusual or significant risks only);
- Assess the risk - i.e. the combination of the likelihood of an event occurring and the severity should it happen;
- Understand who could be affected by the event (i.e. construction workers, general public, children);
- Reduce the risk where reasonably practicable by applying the Principles of Prevention (as required in the CDM Regulations). See Procedure 5 for further information on the Principles of Prevention;
- Detail the design actions taken and list any further actions needed for prevention and mitigation and identify the owners for this future action.
- The above is usually documented within a design risk log/register/schedule/tracker process and most UK design practices will have procedures in place to ensure this happens

British Land expects the Principal Designer to liaise with the designers to identify the key health and safety risks identified within their Designer's risk logs/registers/schedules/trackers and include these within the Project Health & Safety Design Register for communication and co-ordination with the rest of the Project Team.

The Principal Designer may request copies of their Design Risk logs/registers/schedules/trackers, as proof that the mitigation process is being undertaken by the Designers.



## 7.4. 'Design & Planning' Health & Safety Reviews

At regular stages during the design, the Principal Designer with the Designers and Project Team should review the Health & Safety Design Register.

This can be done at specific workshops, or as part of the regular project management/design co-ordination meetings.

The Health & Safety Review should focus on the following:

- project critical activities first (i.e. high risk, programme critical);
- new elements of design, or changes to the design, and any associated risks;
- significant or unusual residual risks to be communicated to the Principal Contractor/Contractors.

## 7.5. Value Engineering Workshops

Where value engineering workshops are organised on a project, it is expected that the Principal Designer is invited to these workshops and that the Health & Safety risk implications of any design or specification changes are considered regarding buildability, future maintenance and building use, as a workplace alongside programme and cost implications.

## 7.6. Provision of Information

The key to successful hazard/risk identification and the development of effective mitigation measures is providing the right information, in a timely manner, with appropriate contents to those parties who can process it and have authority to influence design and construction decisions.

In addition to the project Health & Safety Design Risk Registers described above, effective health and safety information includes:

- notes on drawings like SHE (safety, health and environment) boxes;
- clear, concise and illustrated construction methodologies preferably using 3D and 4D visualisation tools (including projects developed using BIM models); e.g. 'Guidance Note for Clients writing an EIR incorporating Health & Safety Risk Information' endorsed by BIM Alliance Working Group with support of HSE BIM4 Working Group and various Clients.
- other health and safety reports which may be required by the complexity of the project.

The nature of the design will determine the applicability of the different forms of communication. However, the Principal Designer should encourage, promote and requests these formats.

## 8. Provision of Information and Training

British Land recognises the importance of supporting its employees with appropriate information and training in order to ensure that they are aware of their health and safety duties and responsibilities and avoid putting themselves and others at risk.

The following is in addition to the information provided under British Land's corporate arrangements.

### ***Provision of information***

This Construction Health and Safety Policy will be available to all of British Land's development team and will also be provided to the supply chain. To ensure the team maintains its awareness of its roles and responsibilities under this Policy, the development team will be taken through the core elements of the policy, where to find additional information and guidance, and advised of key changes.

This will generally take place in the form of six monthly or annual briefing sessions with the Chair of the Development H&S Committee and the appointed Corporate Construction Health & Safety Advisor, or through regular internal briefing sessions with the Chair of the Development H&S Committee. The Advisor is also retained to be able to provide ad hoc health and safety advice and support to the development team as and when required.

In addition to the above, the Advisor will support the team with the provision of relevant industry information which could have implications for the operations of British Land. This could include information on legislative change, HSE initiatives, results of relevant court cases, industry best practice etc.

### ***Provision of training***

The requirement for health and safety training for British Land's development team is assessed at a team and individual basis through risk assessment and individual appraisals.

As part of our review of training the following is considered:

- The management of risks to our employees (as a result of British Land's activities)
- The management of risks to others (as a result of British Land's activities)
- Existing knowledge and information provided
- Legislative requirements (i.e. asbestos awareness under the Control of Asbestos Regulations)
- Legislative change
- The availability of external health and safety advice and support
- Industry best practice
- Board expectations

The review of training needs will consider the existing knowledge of the team and the requirement for new and/or refresher training.

## 9. Reviewing Performance against British Land's Policy, Arrangements and Procedures

British Land will review the performance of its development team and the performance of Project Teams and Principal Contractors against this Policy, arrangements and its procedures in a variety of ways.

### 9.1. RIBA Stage Client Reports

The RIBA Stage Client Reports will provide the Project Executive/Director with information as to how proactive the Project Team is being in relation to the identification, management and co-ordination of health and safety information on the project.

Usually the Project Health & Safety Advisor in liaison with and support of the Principal Designer will be expected to both pull together a section on health and safety performance/CDM compliance and within this, highlight any key health and safety issues.

### 9.2. Design Audits Reviews

British Land's Corporate Construction Health & Safety Advisor will be instructed to undertake unplanned and planned health and safety audits on projects during the design and planning phase. The aim of these audits is to ensure that Project Teams are complying with the requirements of the CDM Regulations and British Land's Construction Health & Safety Policy and associated procedures. The format and report for this audit is at the discretion of the Corporate Construction Health & Safety Advisor.

Any non-conformances will be brought to the attention of the Project Team and Project Executive/Director such that appropriate measures can be taken to ensure appropriate compliance on the project.

### 9.3. Project Health & Safety Checklists

Each project will be required to complete a Project Health & Safety Checklist at the end of the various RIBA Work Stages. These Checklists will check compliance against British Land's Construction Health & Safety Policy and associated procedures. The Principal Designer is usually requested to complete the checklists on behalf of the Project Executive/Director, via the SharePoint?

At the end of each stage, a copy of the completed checklist is issued to the Project Executive/Director and British Land's Chair of the Development H&S Committee for review.

### 9.4. Construction Site Health & Audits

British Land's Construction Corporate Health & Safety Advisor will be instructed to undertake unplanned and planned health and safety audits on the Principal Contractor's construction operations. The aim of these audits is to ensure that the Principal Contractor is complying with the requirements of the CDM Regulations, British Land's Construction Health & Safety Policy and associated Procedures, and the Principal Contractor's own Construction Phase Plan. The format and report for this audit is at the discretion of the Project Health & Safety Advisor.

Any significant issues will be brought to the attention of the Principal Contractor immediately at the time of the audit.

The audit report, however, will identify both areas of good and bad practice in order to provide British Land with a view of the Principal Contractor's commitment to health and safety management on the project.

## 10. Principal Contractor Accident & Incident Reporting

Each Principal Contractor is required to inform the BL Project Manager and Client Project Health & Safety Advisor following a worst-case scenario (e.g. Fatal and/or Dangerous Occurrence), with an initial Incident Alert within 1 Hour; a Major Injury, within 4 hours; and an injury resulting in a person off more than 3 days prior to a potential over 7 days period. These are followed up with accident – Incident investigation report of the root causes and factors leading to the cause with recommendations and action plan.

Also to complete British Land's online accident and incident reporting on a monthly basis via the Credit 360 system.?

The Principal Contractor is required to provide details in addition to accidents and incidents, including encouraging the reporting of all near misses/near hits/close calls, ('turning a concern turned into a positive action'), as well as the number of hours worked on the project. Therefore, the Accident Incident Rates (AIRs) and if necessary, Accident Frequency Rates (AFRs) can be calculated and compared across projects and benchmarked against HSE industry AIRs.

The information provided is only as good as the Principal Contractor's reporting culture and procedures, but it will help provide an indication of trends across all British Land projects.

### 10.1. Lessons Learnt Reviews

Each project will undergo a lessons learnt review at the end of the project or at suitable stages during the project if of long duration. This will be led by either British Land's Project Executives/Director or delegated to the appointed Client Representative/Project Manager with support when requested of the Project Health & Safety adviser.

Lessons learnt with regards to health and safety management will be considered as part of this process. Information gained will be shared between British Land's Project Executives/Directors and issued to the Chair of the Development H&S Committee for review.

Copies of the reports will be held on British Land's central server, for future reference.

### 10.2. Annual Review of Policy and Procedures

This Policy and its associated Procedures will be reviewed on an annual basis by the Construction Health & Safety Advisor, or after any significant changes to Health & Safety Legislation or project process.

## 11. Improving Health & Safety Performance on our Projects

Undertaking the various reviews and audits in Section 7, is only of use if we learn from our findings and improve the health and safety performance of our projects.

British Land's Chair of the Development H&S Committee and the Project Executives meet regularly at internal meetings where they discuss the health and safety performance of the construction part of the business.

The outcomes of these discussions are fed back into the project process and any health and safety issues are also discussed with the corporate construction Health & Safety advisor.

From these discussions, updates can be made to British Land's Construction Health and Safety Policy and associate procedures and fed back into the live projects and projects which are coming on line.

It is also recognised that appropriate health and safety training should be provided to our Project Executives to ensure that they understand any updates to the policy or procedures, and that they are equipped to implement these changes on their projects (see Section 6).

The Construction Corporate Health and Safety Advisor will also provide regular information bulletins to British Land's development team. These bulletins will contain information on legislative change, HSE campaigns, key issues across British Land's projects, and any areas of focus over the coming months.