IMPERIAL

Construction – Health, Safety and Environment Code of Practice

Imperial Property Division
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Contents

Introduction

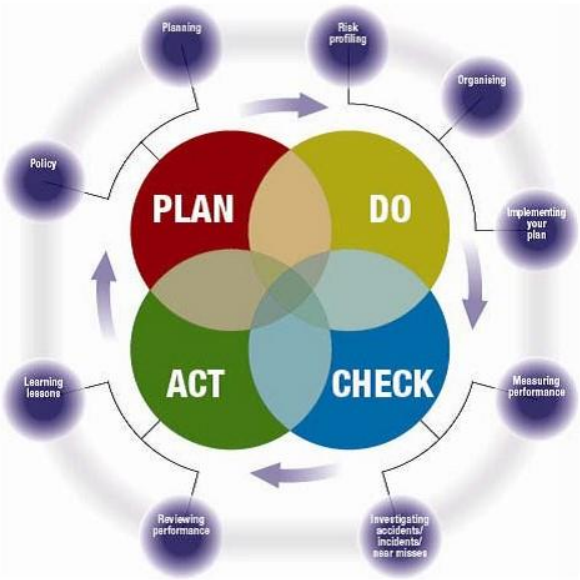
1. This Construction Health, Safety and Environmental Code of Practice (CoP) has been developed to ensure that all construction activities align with the Imperial College London Health and Safety Policy. Imperial College is committed to achieving excellence in all aspects of its operations, including the management of health and safety on construction sites. This CoP also addresses key elements of the Building Safety Act 2022.
2. Imperial aims to provide safe and healthy working conditions for all staff and to take reasonable steps to ensure conditions are maintained. Additionally, Imperial aims to ensure work activities do not negatively impact the health and safety of anyone affected by our work – such as staff, students, visitors, members of the public, contractors – and that our work has no detrimental effects on the environment.
3. The purpose of this CoP is to outline the management arrangements for construction activities at Imperial, enabling compliance with Imperial policies, procedures and health, safety and environmental regulations.
4. This document must be read and understood by all individuals involved in construction projects, including staff members, Principal Contractors, Principal Designers, Designers, Contractors, Sub-Contractors, and any parties performing work.
5. The CoP is structured to follow the chronological sequence of a typical project, making it easier to understand and align with the UK RIBA Project Process Map. The **Imperial RIBA Process Map** can be downloaded, accessed online or requested from the relevant Project Manager.

    - Policy
    - Design
    - Survey
    - Pre-construction
    - Construction Works
    - Post-Construction

Policy

6. Imperial College London, as a large organisation operating across multiple campuses and offering a wide range of services, faces unique challenges in managing health, safety, and environmental concerns on its construction sites.
7. Imperial implemented a safety management system in alignment with the Health and Safety Executive's publication ‘Managing for Health and Safety’ (HSG65). The illustration below outlines the components of the management system that organisations can use as a benchmark for their health, safety, and environmental management.

Figure 1: The Plan, Do, Check, Act Cycle



8. The following describes the elements that make up the health, safety, and environmental model:

Phase	Actions
Plan	• Think about where your organisation is now and where you need to be. • Determine what you want to achieve, who will be responsible for what, how you will achieve your aims, and how you will measure your success. • Decide how you will measure performance and look for leading indicators as well as lagging indicators. • Co-operate with anyone who shares your workplace and co-ordinate plans with them. • Plan for changes and identify any specific legal requirements that apply to you.
Do	• Identify your risk profile. • Assess the risks, identify what could cause harm in the workplace, who it could harm and how, and what you will do to manage the risk. • Decide what the priorities are and identify the biggest risks. • Organise your activities to deliver your plan. • Involve workers and communicate, ensuring clarity on what is needed and fostering positive attitudes and behaviours. • Provide adequate resources, including competent advice where needed. • Decide on the preventive and protective measures needed and put them in place. • Supervise to ensure that arrangements are followed.

Check	• Measure your performance and ensure your plan has been implemented – 'paperwork' on its own is not a reliable performance measure. • Assess how well risks are being controlled and if your aims are being achieved. • Investigate the causes of accidents, incidents, or near misses.
Act	• Review your performance. • Learn from accidents, incidents, ill-health data, errors, and relevant experiences, including those from other organisations. • Revisit plans, policy documents, and risk assessments to determine if updates are needed. • Act on lessons learned, including from audits and inspection reports.

9. Imperial recognises the statutory duties and obligations imposed by UK legislation, particularly under the following laws related to construction activities:
    - ***Health & Safety at Work etc. Act 1974***
    - ***Management of Health & Safety at Work Regulations 1999***
    - ***Construction (Design and Management) Regulations 2015***
    - ***Building Safety Acts 2022***
10. The policy and legislation referred to above apply to all individuals and companies who carry out 'construction work' for, or on behalf of Imperial College London. Construction work includes the undertaking of non-intrusive and intrusive survey work.
11. It is the contractors' responsibility to notify the University's representative of any potential hazards associated with their activities during the works.
12. Contractors must take all reasonable precautions to ensure the health and safety of all those persons under their control and to adequately safeguard members of staff, students, and the public.

Construction (Design and Management) Regulations 2015

13. Imperial is committed to the HSE's objectives for implementing the Construction (Design and Management) Regulations 2015. These objectives are designed to integrate health and safety into the management of construction projects and encourage collaboration among all parties involved to:
    - Improve project planning and management from the outset.
    - Identify and address hazards early in the design or planning phase and implement control measures for any residual risks.
    - Focus effort where health and safety improvements will have the most impact.
    - Minimise unnecessary bureaucracy.
14. As a client, Imperial will comply with the CDM Regulations as outlined in the HSE Guidance document L153, ***Managing Health and Safety in Construction.***
15. Safety planning and management in construction also adhere to the provisions of the ***Management of Health and Safety at Work Regulations 1999.***
16. A copy of the CDM 2015 Regulations, including all associated guidance, can be downloaded free from the HSE website.

17. ***The Management of Health and Safety at Work Regulations 1999*** (MHSWR1999) can be downloaded from legislation.gov.uk.
18. All construction activities carried out for Imperial College London are subject to the relevant legislation and Imperial's policies. The adopted standards will be based on best practices.
19. As the Client, Imperial will provide surveyors, designers, contractors and other relevant duty holders with pre-construction information in line with Regulation 4(4) of CDM 2015. This information will align with the guidelines outlined in Appendix 2 of HSE guidance L153.

Principal Designer and Principal Contractor: Regulation 5 – CDM 2015

20. If more than one contractor is involved, or if it is reasonably anticipated that multiple contractors will be working on the project at any point, Imperial will make the following written appointments:
    - A Principal Designer (PD) will control over the pre-construction phase.
    - A Principal Contractor (PC)
21. The appointed PD must have the required skills, knowledge, experience, behaviours and organisational capability to undertake the work they have tendered for. Additionally, personnel employed to manage the construction work must meet similar standards in terms of expertise and training. Please refer to section 5.1 for more details on industry training standards.
22. Depending on whether the appointment is made before or after the tender stage, every PD must review and sign Imperial's Schedule of Service for Principal Design (SoS) document to fully understand Imperial's expectations for the role.
23. Ideally, the PD must be a designer by profession, a member of the design team and have control over the design during the pre-construction phase. The PD should ideally be appointed at Stage 1 – Feasibility.
24. The CDM Regulation define a Designer as: "An individual or organisation that prepares or modifies a design for a construction project, including the design of temporary works, or arranges for or instructs someone to do so."
25. This definition allows for roles beyond professional designers to be appointed as PD, such as members of the Client's organisation. For smaller projects, Imperial College London may choose to take on the PD role, provided the project manager consults with the Property Division health and safety team for guidance.
26. External Project Managers and Quantity Surveyors may also be appointed as PDs, provided they possess the necessary skills, knowledge, and experience to perform all the required functions of the role. They should seek advice from the Property Division health and safety team.
27. In the case of design-and-build contracts, Imperial may appoint the PC to also take on the responsibility of the PD.
28. The PD is expected to establish and maintain regular communication with the Property Division Health and Safety Team, keeping them informed about the identification and management of significant risks during the design phase.
29. The PD must submit a monthly progress report to the Client's Project Manager, who will then share the report with the Property Division Health and Safety Team for review.

Notifiable Projects

30. A project is considered 'Notifiable' to the HSE under CDM 2015 if it meets either of the following criteria:
    - Construction work is expected to last more than 30 days and involve more than 20 workers on site at one time, or
    - The project is likely to exceed 500 person-days.
31. If a project meets the above criteria (30), Imperial will notify the Health and Safety Executive (HSE) as soon as practicable, and in any case, before commencement of construction work on site. Notification also includes Client, PD and PC. The PC can be added later if it is not known.
32. As the Client, Imperial holds the sole responsibility for notifying the HSE of all notifiable projects, unless this responsibility is explicitly delegated to the Principal Designer (PD) by the health and safety team, in writing.
33. The **CDM notification** form to determine whether a project is notifiable can be downloaded from the Imperial website.
34. Once it is confirmed that the project is notifiable using the form above, **F10 Notification** must be completed by either the Project Manager (PM) or the Principal Designer (PD) and submitted to the health and safety team. They will then use this information to notify the HSE and issue the F10 to all relevant parties.

Asbestos Surveys

35. Asbestos-containing materials (ACM) are present throughout many of the University's properties, especially those built in the 1960s. Imperial has employed a specialist asbestos management company to help manage and maintain the asbestos register for all Imperial buildings.
36. The asbestos management company is also responsible for conducting a survey that helps Imperial comply with its legal obligations under the Control of Asbestos Regulations.
37. Contractors, consultants, and anyone performing survey work on behalf of Imperial will be provided with relevant information and guidance regarding the location of ACMs and any necessary control measures before commencing any construction-related work on site.
38. Designers and contractors involved in pre-construction surveys or enabling works will receive project-specific information about ACMs as part of their Imperial induction.
39. No survey work or construction activities will be permitted unless the individuals involved have been properly inducted and are fully aware of the locations and condition of any ACMs in the areas they need to access or survey.
40. The Project Manager must request an Initial Asbestos Survey Report through the Property Division Customer Service Centre eo.csc@imperial.ac.uk. The request must include a building floor plan that indicates the areas requiring survey information.
41. All personnel working on site, including site-based managers and supervisors, must attend a suitable asbestos awareness training course. The principal, or main contractor, must maintain a record of this training on site for the Client's inspection.
42. Contractors may undertake this training using the appropriate Imperial training material and information and issue certificates as proof of attendance.
43. Imperial organises asbestos awareness training both online and face-to-face throughout the year, and site managers and supervisors currently working on projects are expected to attend.

The training is free of charge. The dates and joining instructions for asbestos awareness courses can be requested from the Client.

44. Any concerns regarding asbestos awareness should be initially reported to the site manager and/or supervisor.
45. If suspected asbestos is found, the areas should be sealed off and monitored to prevent entry until an inspection by the asbestos management company has been completed, and approval for reoccupation has been granted.

Decontamination Certificates

46. Due to the nature of the teaching and research activities at the University, decontamination certificates for areas and equipment will be provided to the contractor before work begins on site.
47. Individuals (including consultants and engineers) conducting survey work must be informed of these issues and inducted by a designated staff member before entering any area where hazardous materials were or are used or stored. In some cases, the department may need to issue a decontamination certificate.
48. The Project Manager (PM) is responsible for discussing and agreeing on these matters with the departmental safety advisor and/or the relevant staff member from the safety department.
49. All decontamination certificates should be issued by the Building Manager (BM), who holds ultimate responsibility for the space.

External Works

South Kensington Specific Information

50. External works must be agreed in advance with the Director of Project Delivery, who will authorise road closures and the location of construction-related plant, equipment, and accommodation.
51. Any proposed works on the South Kensington Campus must be presented to the Campus Coordination Meeting chaired by the Director of Project Delivery.
52. Contractors should be aware that the South Kensington Campus contains a network of underground service tunnels that supply the building and may impact the loading capacity of road surfaces. This could, for example, influence the location of crane lift sites. For more details, refer to Sections 118–120, ***Crane Lifting Operations.***

White City Specific Information

53. External works must be agreed in advance with the Director of White City and the Construction Director, who will authorise road closures and the location of construction-related plant, equipment, and accommodation.

General Information

54. Any underground work, including excavations, boreholes, trenching, or the installation of new cables, requires a permit to work before the work can commence. These can be obtained from the **Property Division webpages** on the Imperial website.
55. The contractor is responsible for obtaining all available information about the type and location of existing underground services, obstacles and tunnels. Imperial will provide a PCI to the PC, usually completed by the PD.

Contractor's Competence

56. Imperial requires all contractors to be registered with accredited professional or trade bodies such as Constructionline, CHAS etc., and comply with the Safety Schemes Procurement (SSIP) process, which ensures contractors' organisations are provided with a single set of criteria for the evaluation of the appropriate levels of skill, knowledge, and experience for the work for which they are tendering.
57. Additionally, the following qualifications are required for individuals:
    - Site Managers must have a valid 5 Day CITB ***Site Managers Safety Training Scheme (SMSTS) Certificate*** or equivalent
    - Site Supervisors must have a valid 2 Day CITB ***Site Supervisors Safety Training Scheme (SSSTS) Certificate*** or equivalent
    - All site personnel, including Imperial PMs or other members of staff whose responsibilities include frequent site visits, must have a valid Construction Skills Certification Scheme (CSCS) card and have it available for inspection prior to entering a construction site.
    - Fire Protection Association (FPA) Hot Works Passport Scheme. Individuals responsible for managing hot work permits on site must be suitably trained and possess a valid and current FPA Hot Works Passport.
    - All site managers and supervisors must attend and complete an industry recognised environmental awareness training scheme from e.g. IEMA, NEBOSH, etc. N.B. Copies of relevant certification should be available on site for the Client's inspection.
58. During and after the tender process, the Imperial Procurement Team is responsible for vetting and ensuring that the appointed PD and contractor have the necessary qualifications, behaviour, organisational capacity, and competence to manage the construction project safely. This includes verifying that all required insurance policies have been submitted.
59. The Site Manager/Supervisor must provide the Property Division Health and Safety team with a copy of their relevant qualifications, particularly the SMSTS or SSSTS certificate. It is the contractor's responsibility to ensure that this record is kept up to date with Imperial.
60. During safety site inspections, Imperial representatives will review the contractor's induction and qualification records to ensure that all operatives on site have a valid induction and hold the appropriate CSCS cards.

Client's Safety Inductions

61. During the design and surveying stages of a project, consultants and contractors must complete the Imperial 'Day 1' safety induction. This requires watching a 20-minute **Day One Health and Safety Video** available on Imperial's Webpages, and completing the multiple-choice questionnaire.
62. During the construction phase, contractors must integrate the Day 1 induction into their site induction process, ensuring that all personnel on site have undergone the required induction.
63. Prior to works commencing on site, Imperial's Health and Safety team will chair a safety induction meeting, which must be attended by the site manager, building manager, project manager, maintenance manager, users group coordinator and other relevant parties as determined by the PM.

64. Ongoing induction training for operatives and visitors is the responsibility of the Principal or Main Contractor. They must maintain a register of all inductions conducted on site, which will be available for inspection by the Imperial representative.

Building Services Surveys and Isolations

65. Services on Imperial premises must not be interrupted without the approval of the Imperial representative. The Project Manager (PM) will arrange a 'Site Handover' meeting before work begins to establish communication with the building maintenance team. This meeting aims to identify existing live services within the work area, locate essential controls such as valves and distribution boards, and agree on isolation procedures.
66. Contractors should use this meeting to discuss and agree on their requirements for on-site services, including any anticipated three-phase power supplies.
67. A schedule for service shutdowns must be agreed with the Imperial maintenance team to allow sufficient time for the rerouting of services and/or provision of temporary supplies.
68. The Project Manager must apply for all services isolations and reconnections through the Property Division Customer Services Centre eo.csc@imperial.ac.uk. Adequate time must be allocated for the maintenance team to complete these tasks and meet the project programme.
69. Contractors must test and verify that all electrical cables on site are dead prior to cutting or removal. They must also visually check that all other services have been properly isolated as part of their health and safety responsibilities.

Method Statement and Risk Assessment

70. Construction work at Imperial is complex, and as such, Imperial has implemented specific conditions suited to the nature of the environment, such as working in laboratories and in occupied buildings.
71. Before starting work on site, contractors must agree with the Imperial representative on the best approach to carry out the works to:
    - Minimise disruption to the Department(s)
    - Effectively manage Health, safety and environmental risks.
    - Safeguard students, staff, visitors and project personnel.
72. It is the contractor's responsibility to notify the Imperial Representative of any hazards associated with their activities that could potentially disrupt Imperial's core operations.
73. A comprehensive Construction Phase Health and Safety Plan outlining the contractor's management approach must be produced by the contractor and agreed with the Imperial representatives prior to the works commencing on site. This information must include details of the welfare facilities which must be in place and maintained throughout the works.
74. A Fire Plan, which sets out the contractor's proposals for managing and controlling the prevention of fire during the construction period and the actions to be taken in the event of a fire on site, or an evacuation of the building for any reason, must be produced and approved by the Fire Safety team. The approved Fire Plan should be included within the Construction Phase Plan for easy referencing.

Construction Works: General Information

75. The minimum requirement for Personnel Protective Equipment (PPE) working on construction sites is:

1. Safety Helmet
2. High-Visibility Vest
3. Safety Boots (Steel-toe capped)
4. Gloves
5. Safety Goggles
6. Trousers (no shorts or skirts)

76. These requirements apply to all site operatives, supervisors, managerial staff and visitors. These rules generally do not apply within the site administration or welfare areas.
77. High visibility vests or jackets worn on site should, in most cases, display the PC's name and must always be worn during working hours when moving around the campus.
78. Working hour restrictions are specified in tender documents for each project, and these must be strictly adhered to.
79. The use of radios or personal stereos is prohibited within the work area or inside any of the imperial buildings.
80. Working at Imperial imposes several restrictions on contractors due to the nature of the environment, such as working in laboratories and occupied buildings. For instance, nitrogen gas may be transported in pressurised vessels using the building's lifts. When this occurs, the use of the lift is prohibited for other persons. Contractor safety induction materials must include protocols for managing such hazardous activities.
81. Contractors must agree in advance with the University's representative on the best approach to carry out the work, with the goal of:
    - Minimising disruption to the Departments, and
    - Effectively managing health, safety, and environmental risks by, for example, installing barriers and signage, using noise-reducing barriers and systems, and implementing appropriate dust mitigation measures to protect those working on the project, Imperial employees, visitors, and the environment.

First Aid and Emergency Procedures

82. At all times, consultants and contractors must be aware of building-specific fire and emergency evacuation procedures. This includes how the system works, the emergency evacuation procedures and the location of the "Assembly Point". This information can be found within the building's **Generic Emergency Evacuation Plan** (GEEP).
83. Prior to work commencing on site, the Principal Contractor must agree on a Fire Management Plan with the Fire Safety Department, firesafety@imperial.ac.uk, which must be implemented throughout the duration of the works. The Fire Management Plan should ensure the following:
    - Sufficient fire-fighting appliances are available throughout the work area, and all personnel are trained in their proper use.
    - Fire-fighting appliances are tested annually.
    - An attendance register for all operatives, staff, and visitors is maintained on site, confirming that all operatives and visitors have evacuated the site/building.
    - Fire escape routes are kept clear of materials, trailing leads, and other obstructions, have adequate lighting, and are clearly signposted throughout the site.
    - Temporary fire escape routes or diversions are suitable for the needs of disabled individuals.
    - Sufficient temporary fire alarm call points or Klaxons are provided, where appropriate.

- Flammable and combustible waste is minimised on site, with packaging removed at the end of each shift.
- Penetrations through fire compartment walls, floors, and ceilings are filled with an appropriate fire-stopping material overnight.
- Gas bottles are removed from buildings and stored overnight in a suitable, locked cage, located externally.

84. In the event of an incident requiring emergency assistance, dial (0)20 7589 1000 from an external phone. This number will connect you directly to Imperial Community Safety and Security**,** who will coordinate with the Emergency Services and direct them to the appropriate location. Please provide the operator with your name, company name, exact location, and a detailed description of the assistance needed.
85. Emergency procedures should be clearly displayed throughout the site and welfare areas for easy reference.

First Aid Information and Arrangements

86. Contractors must provide the Client with the names of at least one operative who holds a valid First Aid Certificate. A first aid kit must also be provided by the contractor and kept fully stocked.
87. All Imperial Community Safety Officers, along with some departmental personnel, are trained to administer first aid. In case of an emergency, assistance can be requested by contacting the Community Safety Office using the number provided above or by locating the nearest First Aider within the building, if necessary.
88. All Community Safety Officers will respond to calls for assistance and are also trained in the use of defibrillation equipment, which can be accessed from their office.

Use of Imperial College London Facilities

89. To prevent potential cross-contamination from dirty PPE, contractors are not permitted to consume food or drink in any Imperial catering facilities designated for staff and students. Contractors may, however, purchase food and drinks as takeaway from these outlets, provided they are in clean clothes.
90. The Imperial College Union outlets located on the Level 2 walkway of Sherfield Building are available for purchasing goods. However, all food and drink must be consumed in the welfare facilities specifically designated for the project.
91. On the South Kensington Campus**,** contractors are not permitted to use specific public areas during break times, including the Queens Lawn, Dangoor Plaza, the open area of the walkway, or any part of Dalby Court decked area surrounded by the Faculty of Mechanical Engineering, Bessemer, and Electrical Engineering buildings.
92. The use of facilities on other campuses should be agreed in advance with the Building Manager and noted in the pre-construction information schedule, which will be provided as part of the tender documents.

Welfare Facilities

93. On the South Kensington Campus, Imperial provides shared contractor welfare facilities located in modular buildings on Ayrton Road and in the RSM Courtyard.

The facilities at Ayrton Road include:

- Canteen serving hot food – Ground Floor
- Drinking water font – Situated externally, adjacent to the canteen
- Male and Female toilets – Located in separate cabins, adjacent to the canteen
- Changing room (Male) – First Floor
- Changing room (Female) – First Floor
- Office facilities – First Floor

The facilities available in the RSM Courtyard include:

- Canteen facility – Contractors can heat their own food and make tea/coffee
- Changing room facilities – Ground Floor
- Lockers – Contractors must provide their own lockers in the changing rooms and remove them at the end of the project.
- Drinking water – A readily available source of drinking water must be provided, conspicuously marked with an appropriate sign, and with drinking vessels available.

General Welfare Requirements:

- Contractors must advise their staff to use these facilities, keep them clean and tidy, and report any defects. This information should be included in the contractor's site rules and induction process.
- All welfare facilities must comply with CDM 2015 Schedule 2 requirements.

Waste Management around Imperial Welfare Facilities:

- Contractors are not permitted to store waste, deliveries, redundant materials, or offcuts around Imperial welfare facilities. All waste must be removed and disposed of off-site. Any contractor found leaving waste around the facilities will be liable for the cost of its removal by Imperial.
- Wastewater must be emptied into containers and taken off-site. Liquid waste must not be disposed of on the grass, in local drains, or anywhere on the Imperial estate. Reinstatement fees will apply for any remedial work required, and these will be charged to the contractor.

94. For White City Campus, no High-Visibility to be outside the PC area. Adequate changing will be provided by either Imperial or the PC.

Smoking Policy

95. The **Imperial College London Smoke-Free Policy** can be accessed on the Human Resources web pages.
96. All Imperial campuses and properties are designated smoke-free zones. Smoking, including the use of e-cigarettes and vaping, is not permitted on or within 20 meters of Imperial land.
97. For larger projects, it may be possible to designate a smoking area, provided it is agreed in advance with the Imperial Fire Safety Department. This must be included in the Construction Phase Plan and site rules.

Hot Works Permit

98. Contractors must comply with the **Imperial Fire Services Code of Practice** for all project works.
99. Permission is required from the Imperial Fire Safety Department for any operations involving flame or spark sources, or heat application (e.g., welding or burning)

100. Permission is required from the Imperial Fire Safety Department for any alteration to existing fire alarm systems or fire emergency plans.
101. Contractors must obtain permission for hot works from the Imperial Fire Safety Department by applying online through the **Permit to Work (PTW)** system.
102. Dust from construction activities may trigger the fire alarm system. Suitable control measures must be implemented. A work permit for hot works is required if capping of sensors is necessary.
103. The above procedures grant approval for Hot Works Permits, allowing the contractor to issue their own company's Hot Works Permits.
104. The Principal Contractor is responsible for issuing Hot Works Permits and managing all hot works on site. Contractors must demonstrate their competence to manage hot works performed by their staff or sub-contractors. Please refer to paragraphs 56 - 59 above for training standards.
105. Welding Works: The HSE and the British Occupational Health Society (BOHS) have issued new guidance on precautions to be taken when welding different types of metal. This update follows medical advice linking welding fumes to cancers. Contractors must follow these guidelines, which can be accessed via the following links:
    - **HSE Welding Guidance**
    - **Breathe Freely Welding Safety**
106. Other Permits to Work: The PTW system must be completed and submitted for any works that:
    - Could potentially disrupt University operations
    - Require roof access
    - Pose a risk to the individual
107. Examples where an PTW is required include electrical and mechanical work, chemical or radiation stores, certain laboratories, and access to plant rooms, service risers, under-floor services, and roofs. Contractors must request a **Permit to Work.**

Roof Construction Works Permit

108. Contractors must request and complete a permit for any roof works that have the potential to damage the roof surface, involve opening existing service penetrations, require new penetrations, or create any other circumstances that may put the building at risk of water ingress.
109. The **Roof Permit Request Form** must be requested from the Client's Project Manager and submitted with sufficient lead time to allow for review and comments by the Client's Building Management team.

Working in Tunnels

110. Any project work requiring access to any service tunnels must comply with the **Service Tunnel Code of Practice**
111. Work that requires access to service tunnels located under Exhibition Road and the Sir Alexander Fleming Building must be agreed prior with the Head of Maintenance and Maintenance Manager. Pre-approval is necessary as individual may require harness training and/or require the presence of Imperial's specialist Service Tunnel Recuse Contractor during work activity.

Security Issues

112. All personnel working at the University must obtain a security identity card and always wear it while on Imperial property. The ID card also serves as a proximity card, granting access to specific areas of the University.
113. Contractors and consultants/contractors conducting survey work must watch the Imperial Day 1 Induction video and attend an induction with the Building and Maintenance Managers. Managers and Supervisors requiring ID cards must also complete an additional induction with the Property Division Health and Safety team.
114. Individuals requiring ID cards should inform the PM and provide the following details: names of individuals, the Client's project name and number, the areas requiring access, and the start and end dates for their time on site.
115. ID cards will only be issued once this information is logged in the Community and Security Office System. Additionally, individuals must present the ID office with a signed authorisation certificate from the induction meeting, signed by a member of the Property Division Safety Team.

External Scaffolding Security

116. External scaffolding must be equipped with a suitable alarm system connected to the Security Control desk. The base of all external scaffolding should be enclosed and securely fastened to prevent unauthorised access.
117. Where there is a risk of vehicles coming into contact with or reversing into scaffolding, solid barriers must be installed to prevent such incidents. All external scaffolding must be fully enclosed with a fire-retardant material, such as Mono-flex or equivalent.
118. External timber-framed hoardings should be constructed to a minimum height of 2440mm and painted in Imperial College London colour as follows:
    - Main plywood panels: Dulux Trade Sapphire Salute
    - 125mm timber rail skirting: Dulux Trade Sapphire Salute

Crane lifting Operations

119. The use of cranes on any Imperial College London campus requires written approval of the lifting plan from the PM and the Property Division Health and Safety team. For White City development approval would be with the Construction Director.
120. Depending on the nature or complexity of the lift, Imperial may require the appointment of an individual Engineer/Consultant to attend the site on the day of the crane lift to ensure the lifting plan and method statement are properly implemented.
121. Campus-specific **'Crane Lifting Guidance'** have been developed for all campuses and are available for reference. Contractors should request the relevant Crane lifting guidance from the Client's PM for the campus where work will be conducted.

Car Parking and Deliveries

122. South Kensington Specific Information
    - All personnel are encouraged to use public transport to commute to the South Kensington Campus, as there is generally no free parking available for suppliers. However, in certain cases, car parking spaces may be provided to support the project process.

- Contractors are strictly prohibited from parking on the pedestrian route adjacent to Imperial buildings on Exhibition Road.
- At the South Kensington campus, all car parking requests must be made by the PM and approved by the Vehicle Access & Fleet Coordinator.

123. General or Other Campus Information
    - Specialist tasks requiring vehicles with specific tools or equipment to be close to the work site may be permitted to occupy parking spaces for the duration of the task.
    - At other campuses, car parking arrangements must be agreed upon in advance with the PM.
    - Drivers must comply with Imperial's traffic signage and speed restrictions.
    - Contractors should provide delivery companies with a full, accurate delivery address and a name and contact telephone number. Leaving contact details with gatehouse personnel will help expedite delivers and reduce traffic congestion.
    - Vehicles may be subject to random searches by Imperial's security officers when entering or leaving any campus.

Accident and Incident Reporting

124. Contractors must record and report all near miss incidents, first aid treatments, minor accidents and dangerous occurrences on Imperial premises, as well as those dealt with under the ***Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013***.
125. This information is to be shared with the Client's PM and Property Division Health and Safety Team. This information will be used to collect statistics, to better inform decisions on safety management.
126. All reported injury incidents and significant near misses will be reported through CoreStream, Imperial's safety reporting system by the Property Division's Health and Safety Team.
127. Contractors are required to provide a monthly summary report to the Health and Safety Team using the Imperial in-house Pro-Forma. The information required includes near misses, incidents, minor accidents, reportable accidents, the number of persons working on site and total person hours worked on the project in the reporting month.
128. In the event of an incident requiring the attendance of the emergency services, Contractor's must immediately advise the Property Division Health and Safety team, who will facilitate the Imperial investigation.
129. The PC must provide an interim written report to the Client's PM (including a copy sent to Health and Safety Team) within 24 hours and a full detailed report within one week.

Working at Height

130. As recognised throughout the industry, there is a hierarchy of control to follow when selecting equipment for tasks, such an:
    - Fixed scaffolding with guardrails
    - MEWPs (including cherry pickers and scissors lifts)
    - Peco lifts
    - Mobile scaffold towers
    - Inherently stable podiums
    - Step ladders

131. This hierarchy should be followed when selecting equipment for work at height, and the chosen equipment must be documented in a risk assessment.
132. If a step ladder is the only viable option as a last resort, a permit to work must be issued for short-duration tasks, provided that three points of contact with the ladder is always maintained.
133. Any equipment used for work at height must be erected or operated by a competent, trained individual. Training records must be verified before work begins.
134. Information and guidance on working at height on any Imperial premises can be found in the **Property Division Working at Height Code of Practice**

Considerate Constructors Scheme

135. Construction projects will be considered for registration with the Consider Constructors' Scheme (CCS). The Client will make the decision to register, and this should be outlined in the tender documents.
136. Alternatively, Imperial may instruct the PC to register the project after the appointment. For more details, please refer to the **CCS Registration.**

Environmental Policy

137. Imperial is committed to minimising the environmental impact of its construction activities and ensuring compliance with all relevant environmental legislation, regulations, and Imperial policies.
138. All construction and refurbishment projects must adopt best practices to protect the environment and reduce their carbon footprint.
139. Contractors are expected to implement effective site practices to minimise waste, emissions, and resource consumption. This includes:
140. Implementing site-specific environmental management plans in accordance with the latest Imperial policies and guidance.
141. Maintaining a waste management plan that prioritises waste reduction, segregation, and recycling.
142. Preventing pollution by managing dust, noise, vibration, and water runoff through appropriate control measures.
143. Ensuring hazardous substances, including chemicals and fuels, are stored and handled in compliance with environmental regulations to prevent spills and contamination.
144. Reducing the impact of transport and deliveries by planning logistics efficiently and using low-emission vehicles where possible.
145. Training site personnel on environmental best practices and ensuring they comply with all site-specific requirements.
146. Contractors must familiarise themselves with and adhere to the latest Imperial environmental standards, ensuring that all works align with Imperial's broader sustainability objectives.

Sustainable Construction

147. Imperial is committed to integrating sustainability principles into all construction and refurbishment projects. The University seeks to minimise resource consumption, reduce carbon emissions, and ensure efficient use of materials, in line with industry best practices and institutional sustainability targets.

148. To support sustainable construction, Design teams and contractors should:
149. Maximise the reuse of existing building materials, fittings, and equipment to minimise waste and resource depletion.
150. Specify materials from responsible and accredited sources, including those with high recycled content or low embodied carbon.
151. Consider utilising modular construction and off-site prefabrication methods to enhance efficiency and minimise on-site waste.
152. Use energy-efficient plant, equipment, and temporary site facilities to minimise fuel consumption and emissions.
153. Implement effective water conservation measures, including rainwater harvesting and water-efficient fixtures where feasible.
154. Reduce construction site energy consumption by implementing smart site management practices, including the use of LED lighting and motion sensors.
155. Work with suppliers to establish "take-back" schemes for unused or surplus materials to minimise waste.
156. Sustainability requirements will be determined on a project-specific basis in line with Imperial policy. While some projects above £5 million may be assessed under schemes such as BREEAM, this is not a universal requirement.
157. Contractors are responsible for providing regular waste management reports and demonstrating compliance with sustainability objectives throughout the project.

Record Documentation

158. Imperial's requirements for record information are clearly outlined in the following documents:
    - **Production Guidelines for the Building Fabric Manual (incorporating Health & Safety File)**
    - **Production Guidelines for the Operating & Maintenance Manuals (Mechanical & Electrical Services)**
    - **Record Document Process Guidelines; Guidance for the Project Team.**
    - **Building Information**

159. It is the contractor's responsibility to ensure that adequate resources are included in the tender return for the planning, management, and timely production of this vital information.
160. Record documentation should be considered a project "deliverable," with equal importance to factors such as programme, quality, and cost.
161. The contractor will produce a production programme and ensure that opportunities are scheduled for regular reviews, comments, and document sign-offs throughout the construction period.
162. It is expected that all documentation, except for testing and commissioning certificates, will be signed off and ready for delivery to the Client on the agreed-upon project handover date.
163. Providing accurate record information at the conclusion of construction work is crucial for enabling the Client to effectively maintain plant and equipment essential to the University's core business and to manage Imperial's assets efficiently.
164. Project-specific Exchange Information Requirements (EIR) are required for any project or change within Imperial buildings. The purpose of this document is to set out the key project information deliverables.

Building Safety Act 2022

165. The Building Safety Act 2022 (BSA) applies to all construction projects, regardless of whether they involve Higher-Risk Buildings (HRBs). However, projects involving HRBs are subject to additional regulatory requirements and oversight by the Building Safety Regulator (BSR).
166. Imperial ensures compliance with the BSA by embedding its requirements into all stages of project planning, design, and construction.
167. The Act introduces key duties for all stakeholders, including clients, designers, and contractors, to ensure buildings are safe throughout their lifecycle.

BSA Principal Designer and Principal Contractor Roles

168. The BSA mandates clear responsibilities for clients, designers, and contractors, ensuring compliance with building regulations and safety management throughout the project lifecycle
169. A Principal Designer (PDBR) and Principal Contractor (PC) must be appointed for all projects, regardless of whether multiple organisations are involved. These roles are essential for managing design and construction risks in line with Building Regulations.
170. The PDBR is responsible for planning, managing, and monitoring the design work to ensure it meets the functional requirements of building regulations. The specific duties and expectations for this role are outlined in the Imperial PDBR Scope of Services document, which will be issued before appointment.
171. The PC is responsible for ensuring that construction work complies with building regulations, managing safety risks, and coordinating site activities effectively.
172. These duty holders must ensure that safety considerations are adequately planned, communicated, and recorded throughout the project.

Higher-Risk Buildings (HRBs) and the Building Safety Regulator (BSR)

173. For HRB projects, additional oversight and regulatory controls apply. The Building Safety Regulator (BSR) plays a central role in ensuring compliance at key project milestones through the Gateway Review Process.
174. **Gateway One** (Planning Stage): Ensures safety considerations are integrated at the earliest stage of design.
175. **Gateway Two** (Pre-Construction Stage): Requires regulatory approval from the BSR before construction can commence. This replaces traditional Building control applications for HRBs.
176. **Gateway Three** (Completion & Occupation): Before occupation, the completed building must undergo a final review to confirm compliance with all safety requirements, after which the BSR issues a completion certificate.
177. For non-HRB projects, standard building control processes apply. However, compliance with BSA principles, including the appointment of a PDBR, risk management, and duty holder accountability, remains a fundamental requirement.

Key Compliance Measures

178. To meet BSA obligations, Imperial and its appointed duty holders must ensure:
179. **The Golden Thread of Information:** Maintain accurate and up-to-date safety records, ensuring that design, construction, and operational safety data are preserved.
180. **Mandatory Occurrence Reporting (MOR):** Establish a reporting system to capture safety-critical incidents and ensure timely corrective actions.

181. **Change Control Process:** Document and assess changes to design or construction. Major changes for HRBs require BSR approval, while notifiable changes must be reported before implementation.
182. Imperial College London is committed to ensuring that all projects, whether HRB or non-HRB, meet the highest safety standards in compliance with the Building Safety Act 2022.
183. While Imperial has no direct responsibility for establishing, maintaining, or operating the MOR system during construction, it will provide a statement to the BSR detailing the MOR systems the Principal Designer and Principal Contractor have in place before construction begins.

Document Revisions

Version	Date	Section	Summary of changes	Revised by
1	July 2019	2, 3, 5.1, 6.2, 6.6, 6.8, 6.10,6.11	Estates Operations Policy, Principal Designer, Contractors Competence, SHELT re-established, Welfare Facilities, Hot works and welding guidance, service tunnels, security and scaffolding, considerate constructors scheme.	Oluseyi Oduntan
2	June 2022	113	External Scaffolding Security, smoke policy, and general clerical corrections	Oluseyi Oduntan
3	March 2025	Whole policy	All sections due to recent restructuring and introduction of Building Safety Act 2022. Document content has been edited, the Imperial branding has been updated, and hyperlink functionality has been added throughout.	Oluseyi Oduntan Melissa Mayhook
4	September 2025	Whole policy	Document edits to reflect organisational changes.	H&S Team and White City Development Team