

Health and Safety Considerations for the Retrofit of Croft Street Block 2

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Acronyms, and Abbreviations

- **BSA:** Building Safety Act 2022
- **CDM:** Construction (Design and Management) Regulations 2015
- **HSE:** Health and Safety Executive
- **HRB:** Higher-Risk Building (typically buildings over 18 metres or 7 storeys containing at least two residential units)
- **Principal Contractor (PC):** The contractor with control over the construction phase of a project involving more than one contractor.
- **BSR:** Building Safety Regulator
- **COSHH:** Control of Substances Hazardous to Health Regulations 2002
- **PUWER:** Provision and Use of Work Equipment Regulations 1998
- **UKCA:** UK Conformity Assessed
- **CISRS:** Construction Industry Scaffolders Record Scheme (the recognized qualification for scaffolding operatives)

- **CPP:** Construction Phase Plan
- **EAV:** Exposure Action Value (the daily amount of vibration exposure above which employers are required to take action to control risks)
- **ELV:** Exposure Limit Value (the maximum amount of vibration an employee may be exposed to on any single day)
- **HAVS:** Hand-Arm Vibration Syndrome (a preventable but permanent condition caused by extensive use of vibrating power tools)
- **MSDS:** Material Safety Data Sheet (a document detailing the hazards and handling procedures for chemical substances)
- **PAT:** Portable Appliance Testing (the routine inspection of electrical appliances and equipment to ensure they are safe to use)
- **PPE:** Personal Protective Equipment
- **R&D (Survey):** Refurbishment and Demolition Survey
- **TILE:** Task, Individual, Load, Environment (a risk assessment framework used specifically for manual handling operations)
- **FFP3:** Filtering Facepiece (the highest grade of disposable respiratory mask)

The Impact of the Building Safety Act and Building Safety (Wales) Bill

The retrofit of Croft Street Block 2 represents a significant undertaking on a residential tower block. Because this structure is a high-rise residential building, the Building Safety Act 2022 (BSA) and corresponding Welsh regulations are heavily applicable. The BSA was introduced following the Grenfell Tower tragedy to overhaul the regulatory framework for the built environment, specifically targeting Higher-Risk Buildings (HRBs) (Health and Safety Executive, 2023).

Welsh Building Categorisation

The newly passed Building Safety (Wales) Bill diverges from the English system by introducing a broader, three-tier framework for regulated buildings. Because Croft Street Block 2 is a residential tower block (meeting the threshold of being at least 18 metres in height or having at least 7 storeys), it is legally classified as a Category 1 Regulated Building (Clyde & Co, 2026).

- **Managerial Compliance Example:** Management must formally register Croft Street Block 2 under the new Welsh registration regime before the newly retrofitted flats can be re-occupied. The Principal Accountable Person (PAP) likely the building owner or the local authority client holds this duty. However, as the Principal Contractor, UWTSD Construction management must comply by providing the PAP with the finalized structural and fire safety assessments to facilitate this legal registration. Failure to support this registration process can result in severe delays and criminal offenses.

Local Authority Building Control

A critical difference between the English and Welsh implementation of the Building Safety Act is the regulatory body in charge. In England, the Building Safety Regulator (BSR) oversees high-rise building control. However, under the *building (Higher-Risk Buildings Procedures) (Wales) Regulations 2025*, the building control authority for Higher-Risk Buildings (HRBs) in Wales is the relevant Local Authority (Welsh Government, 2026).

- **Managerial Compliance Example:** For the Croft Street project, UWTSD Construction must direct all Building Control Approval applications (such as Gateway 2 pre-construction approvals) directly to Swansea Council, not the national BSR. Managerial procedures must be updated so that the site management team is coordinating directly with Swansea Council's specialized building control officers for all formal approvals, inspections, and the final handover of the Golden Thread information.

Mandatory Occurrence Reporting System

A major procedural requirement coming into force on 1 July 2026 is the legal obligation to establish a system for recording and reporting safety-related incidents during the construction phase of an HRB.

- **Managerial Compliance Example:** Before any physical work begins such as removing old cladding or installing fire sprinklers UWTSD Construction management must establish a formal Mandatory Occurrence Reporting System (Local Government Lawyer, 2026). From a managerial perspective, this is not just an accident book it is a specialized digital log where site managers must promptly record and report any design flaws, structural concerns, or fire safety issues discovered during the retrofit that could present a risk of significant death or injury. Management must train all site supervisors on how to use this system to proactively flag widespread safety issues.

Applicable Health and Safety Legislation and Managerial Compliance

While multiple regulations apply to a project of this scale, the installation of weatherproof cladding necessitates strict adherence to the Work at Height Regulations 2005. As falls from height remain the leading cause of fatal accidents in the UK construction sector (HSE, 2023), managing this risk is paramount.

Managerial Compliance Scaffolding and Work at Height

From a managerial perspective, compliance extends beyond merely providing scaffolding, it requires implementing robust procedures and ensuring workforce competence.

- **Procedures and Inspections:** Management must ensure that an independent, temporary works design is commissioned for the scaffolding encapsulating Croft Street Block 2. As per statutory requirements, the Site Manager must implement a procedure wherein the scaffold is inspected by a qualified person before it is used, after any severe weather, and at regular intervals not exceeding seven days (Health and Safety Executive, 2014).
- **Training and Competence:** Management cannot assume competence. Procedures must be in place to verify that all scaffold erectors hold valid Construction Industry Scaffolders Record Scheme (CISRS) cards. Furthermore, general operatives tasked with installing the cladding must receive site-specific induction training regarding working on scaffolding, focusing on safe material loading limits and the strict prohibition of altering scaffold ties.
- **Public Protection:** Because Croft Street is a live residential environment, management must implement physical exclusion zones at ground level during scaffolding erection and cladding installation to protect residents from falling materials, utilizing debris netting and secure hoarding.

Post-Brexit PPE Divergence and the UKCA Mark

Under the Personal Protective Equipment at Work (Amendment) Regulations 2022 (which expanded duties to "limb (b)" workers and casual contractors), management must also factor in the post-Brexit divergence regarding product safety standards. The HSE now strictly monitors the safety of workplace products under the UK Conformity Assessed (UKCA) marking system, which replaces the European CE mark.

- **Managerial Compliance Example:** When procuring safety equipment for the Croft Street retrofit, the Site Manager must update the supply chain procedures. For instance, when purchasing fall-arrest harnesses for the scaffolders installing the external cladding, or FFP3 respiratory masks for operatives drilling into potentially hazardous concrete, management must verify that these items carry the valid UKCA mark. Using uncertified or outdated equipment violates the regulations and voids site insurance policies.

HSE Strategy 2024-2025: Mental Health as a Primary Hazard

The HSE Business Plan 2024-2025 explicitly targets the reduction of work-related ill health, elevating mental health, depression, and stress to the same level of regulatory scrutiny as physical hazards like falls from height. Refurbishing a live residential tower block is a highly pressurized environment for workers, who must manage tight spaces, noise constraints, and daily interactions with the public/residents.

- **Managerial Compliance Example:** To comply with the HSE's updated strategic directives, management must go beyond standard physical risk assessments. The Principal Contractor must conduct and document stress and mental health risk assessments for the workforce. Practically, this means training and appointing dedicated Mental Health First Aiders on the Croft Street site, ensuring toolbox talks cover fatigue management, and implementing clear procedures for workers to report hostile interactions with residents without fear of reprisal.

The Control of Noise at Work Regulations 2005

Retrofitting a concrete tower block while residents are still living in or around it will generate significant noise, particularly from drilling into the exterior to attach the weather-proof cladding and ripping out old bathroom tiles.

- **Managerial Compliance Example:** The Site Manager must conduct a noise risk assessment to determine if the workers are around noise that exceed the Upper Exposure Action Value 85 decibels (Health and Safety Executive, 2005). From a managerial perspective, compliance means adhering to the hierarchy of control: first, looking to eliminate or reduce the noise at the source (e.g., hiring lower-noise power tools or acoustic screens). If the noise cannot be reduced, management must strictly enforce the wearing of suitable hearing protection (like ear defenders) and establish mandatory noise exclusion zones (Health and Safety Executive, 2005). Furthermore, to manage the impact on residents, management should implement restricted working hours for high-noise activities (e.g., strictly no percussion drilling before 9:00 AM).

Manual Handling Operations Regulations 1992

Musculoskeletal disorders can be the most common causes of occupational ill-health in construction. The Croft Street project requires moving heavy, awkward loads, such as new bathtubs, kitchen worktops, and large exterior cladding panels up multiple storeys.

- **Managerial Compliance Example:** Management has a legal duty to avoid manual handling tasks "within reason" (Health and Safety Executive, 2016). Where it cannot be avoided, a specific manual handling risk assessment using the TILE framework (Task, Individual, Load, Environment) must be completed. For this project, a managerial compliance procedure would involve planning the logistics so that heavy materials are delivered as close to the work area as possible using mechanical aids, such as a specialized construction hoist attached to the scaffolding (Health and Safety Executive, 2016). Management must also ensure all operatives have documented training in safe lifting techniques.

Provision and Use of Work Equipment Regulations 1998 (PUWER)

Installing fire sprinklers and cladding requires a variety of specialized tools, from pipe threaders to heavy-duty masonry drills. PUWER requires that if any of the equipment provided for work is suitable, safe, and regularly inspected.

- **Managerial Compliance Example:** To comply with PUWER, UWTSD Construction management must implement a strict equipment management procedure (Health and Safety Executive, 2014). This includes ensuring all 110v power tools undergo regular Portable Appliance Testing (PAT) and visual inspections before use. Furthermore, management cannot allow anyone to use specialized equipment just because they are on site; they must maintain a training matrix that verifies which specific operatives are trained and authorized to use high-risk tools like abrasive wheels or circular saws (Health and Safety Executive, 2014).

The Control of Vibration at Work Regulations 2005

The installation of weatherproof cladding requires extensive drilling into the concrete exterior of the tower block, while the stripping of old bathrooms may require the use of breakers. This exposes operatives to Hand-Arm Vibration Syndrome (HAVS), which can cause permanent nerve damage.

- **Managerial Compliance Example:** The Principal Contractor must legally protect workers from the risks of vibration. Management must calculate exposure to vibration using the Exposure Action Value (EAV) and Exposure Limit Value (ELV) (Health and Safety Executive, 2005). As a compliance procedure, the Site Manager should procure low-vibration power tools and implement a strict job-rotation system. For example, if operatives are using heavy masonry drills to fit cladding brackets, management must enforce mandatory breaks or swap them to low-vibration tasks (like site cleanup or material handling) before they hit their daily ELV limit (Health and Safety Executive, 2005).

Compliance with CDM Regulations 2015

The Construction (Design and Management) Regulations 2015 (CDM) apply comprehensively for the Croft Street project. UWTSD Construction will likely act as the Principal Contractor, bearing the

statutory duty to organise, supervise, monitor, and align health and safety when construction is taking place (HSE, 2015).

Practical Application and Risk Reduction

To comply with CDM 2015 and actively reduce risks on this specific project, UWTSD Construction must develop a robust Construction Phase Plan (CPP) before opening the site (Health and Safety Executive 2015).

- Example 1: Segregation of Works. Because residents may remain in the building or require access during the retrofit of kitchens and bathrooms, the CPP must detail how construction traffic and pedestrian routes will be segregated. This could involve designating specific service elevators for contractors and materials, thereby eliminating the risk of residents encountering heavy loads or hazardous tools.
- Example 2: Managing Asbestos Risks. In older tower blocks, the presence of asbestos is a foreseeable risk during kitchen and bathroom strip-outs. Under CDM regulations, the PC must coordinate with the Client to review the existing asbestos register before work begins. If suspect materials are identified, management must halt work and commission a refurbishment/demolition asbestos survey, ensuring specialized contractors are utilized if removal is necessary.

Post-Construction: The Health and Safety File

CDM 2015 doesn't just apply to the active building phase; it is concerned with the long-term safety of the structure. When the project has ended, a Health and Safety File needs to be given to the client this file contains information necessary for future cleaning, maintenance, alteration, or demolition.

- Managerial Compliance Example: As the Principal Contractor, UWTSD Construction management has a duty to gather all the health and safety information throughout the build and pass it to the Principal Designer for the final Health and Safety File (Health and Safety Executive, 2015). Managerially, this requires implementing a robust document control procedure to continuously track "as-built" information. For instance, management must securely log the exact specifications, routing, and isolation valve locations of the newly installed fire sprinklers, as well as the structural load testing results of the new cladding brackets.

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