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1. Introduction

The construction sector is one of the highest risk industries in Britain due to the range of hazards associated with construction activities, including working at height, manual handling, exposure to hazardous substances and interaction with heavy machinery. The aim of this report is to develop awareness of the health and safety challenges associated with the planned retrofit of Croft Street Block 2, a residential tower block in Swansea, and to demonstrate how these risks can be effectively managed through compliance with relevant legislation and industry best practice.

Swansea Council is planning significant improvements to the Croft Street tower blocks to improve living standards and energy efficiency, the proposed work includes the installation of new kitchens and bathrooms, the fitting of fire sprinkler systems and the addition of weather-proof cladding to the building exterior. Information provided by Swansea Council also confirms that the blocks form part of Swansea's high-rise housing stock and are undergoing long term improvement works to modernise accommodation and improve safety standards (Swansea Council, 2024). (Site images may be seen at the bottom of the report)

Due to the scale of the refurbishment and the fact that the work is being carried out on a high-rise residential building that may remain occupied during construction, the project presents significant health and safety challenges. This report examines the relevance of the building Safety Act and Building Safety Bill, discussing the key health and safety legislation applicable to the project from a managerial perspective and explains how the Construction (Design and Management) Regulations 2015 (CDM) can be applied to reduce risks and improve safety throughout the construction process.

2. Building Safety Act and Building Safety (Wales) Bill

The Building Safety Act 2022 is highly relevant to the Croft Street Block 2 retrofit project because it applies to higher-risk residential buildings, particularly those over 18 metres in height or seven storeys (UK Government, 2022). Since Croft Street Block 2 is a residential tower block, it is likely to fall under this category, meaning that stricter building safety requirements and site management will apply throughout the project.

The Building Safety Act was introduced following the Grenfell Tower disaster to improve accountability, fire safety and risk management in high-rise buildings. One of the most important aspects of the Act is the introduction of clear dutyholder responsibilities for the client, principal designer and principal contractor. These parties must demonstrate competence and ensure that safety is considered throughout the design, construction and occupation stages of the building (HSE, 2023).

For this project, the Act will significantly affect planning and project management procedures. The installation of external cladding and fire sprinkler systems means that fire safety considerations will be central to the design process, the principal designer must ensure that only compliant and fire-resistant materials are specified, while the principal contractor must ensure safe installation and proper supervision on site.

The Building Safety Act also introduces the Gateway approval process, which consists of three stages:

- Gateway 1 – Planning and fire safety considerations
- Gateway 2 – Approval before construction begins
- Gateway 3 – Final certification before occupation

These gateways are designed to ensure that safety risks are identified and controlled before work progresses. For example, before external cladding work begins the site team must demonstrate that the chosen materials meet fire safety standards and comply with current regulations, these areas of the building safety act would heavily apply and need to be considered for the proposed works.

Another important feature is the requirement for a **“Golden Thread”** of information, this refers to maintaining accurate and accessible digital records relating to building safety throughout the lifecycle of the building. For Croft Street Block 2, this would include records relating to sprinkler installations, fire safety systems and all other proposed works to be completed in the project. Maintaining these records improves accountability and ensures that future maintenance work can be carried out safely. UK Government (2024) Keeping information about a higher-risk building: the golden thread

The Building Safety (Wales) Bill supports similar objectives but applies specifically to Welsh housing and building regulations, the legislation increases the involvement of local authorities and strengthens safety standards across residential buildings in Wales (Welsh Government, 2023). As the project is located in Swansea, compliance with Welsh specific requirements and close communication with Swansea Council is essential.

The legislation also places greater importance on resident safety and communication, since residents may remain within the building during parts of the refurbishment process, contractors must ensure that occupants are informed about construction activities, emergency arrangements, and temporary changes to access routes or fire procedures.

Overall, the Building Safety Act and Building Safety (Wales) Bill will have a major impact on the planning, design, and management of the Croft Street project, the legislation promotes a proactive approach to safety management and places greater responsibility on organisations to ensure that safety risks are identified and controlled effectively.

3. Health and Safety Legislation and Managerial Compliance

A range of health and safety legislation applies to this project, however, successful compliance depends not only on understanding legal requirements but also on implementing effective management systems, training programmes and safe working procedures within the croft street retrofit project itself.

3.1 Health and Safety at Work Act 1974

The Health and Safety at Work Act 1974 forms the foundation of health and safety law within Britain, it places a legal duty on employers to ensure responsibility for the health, safety and welfare of employees and anyone affected by the work activities carried out on site (HSE, 2023).

For this project, this duty extends not only to construction workers but also to residents living within the tower block, managers must therefore ensure that hazards are identified and controlled through effective planning and supervision. Risk assessments need to be carried out for all major activities.

Managers must also ensure that workers receive appropriate training and supervision. Site inductions should be carried out before work begins and should explain emergency procedures, welfare arrangements, site hazards, and reporting procedures.

3.2 Management of Health and Safety at Work Regulations 1999

These regulations require employers to systematically manage health and safety through risk assessment, planning, organisation, and monitoring.

From a site management perspective, compliance would involve producing comprehensive Risk Assessments and Method Statements (RAMS) for all construction activities, e.g., work involving external cladding installation would require assessment of risks associated with falling objects, working at height, adverse weather conditions, traffic management for possible road closures etc.

Site managers must also establish emergency procedures, due to the nature of the project and the presence of residents, fire evacuation arrangements will be particularly important during the installation of sprinkler systems and any hot works activities, all hot works will require hot work permits given to subcontractors by site agents/any qualified individuals.

Regular monitoring should also take place through site inspections, audits and toolbox talks to ensure workers continue to follow safe systems of work, these are carried out by the relevant on site personnel.

3.3 Work at Height Regulations 2005

Working at height represents one of the most significant hazards associated with this project due to the installation of external weather-proof cladding.

The Work at Height Regulations 2005 require all work at height to be properly planned, supervised, and carried out by competent persons ” You must make sure work is properly planned, supervised and carried out by competent people with the skills, knowledge and experience to do the job.” (HSE, 2023). To comply with these regulations, UWTSD Construction would need to ensure that scaffolding systems are designed and erected by qualified professionals.

Compliance measures would include:

- Weekly scaffold inspections by CISRS-qualified inspectors
- Installation of guardrails and toe boards
- Use of fall arrest systems and safety harnesses
- Safe access and egress routes

Managers must also ensure workers are trained in working at height procedures and understand how to correctly use fall protection equipment.

3.4 COSHH Regulations 2002

The Control of Substances Hazardous to Health (COSHH) Regulations apply because workers may be exposed to hazardous substances such as dust, adhesives, sealants and paints during refurbishment activities.

Exposure to construction dust can lead to serious respiratory illnesses, site managers and health and safety officers must therefore ensure that COSHH assessments are carried out and suitable control measures implemented.

Examples of compliance include:

- Using dust suppression systems, filtration systems, respiratory masks etc
- Providing respiratory protective equipment (RPE)
- Storing hazardous substances safely in labelled containers (or in on site chemical stores) usually manned by the site gateman
- Providing COSHH awareness training

Good housekeeping procedures must also be maintained to reduce dust accumulation throughout the site.

3.5 Manual Handling Operations Regulations 1992

The installation of kitchens and bathrooms will involve lifting and moving heavy materials and equipment, manual handling injuries are common within the construction industry and can result in muscular issues. HSE (Sept 2016)

Managers can reduce risks by:

- Providing mechanical lifting aids such as trolleys and hoists
- Delivering manual handling training
- Planning deliveries to minimise unnecessary movement of materials

Workers should also be encouraged to report any unsafe lifting practices or concerns.

3.6 PUWER and LOLER Regulations

The Provision and Use of Work Equipment Regulations (PUWER) and Lifting Operations and Lifting Equipment Regulations (LOLER) are particularly relevant where machinery and lifting equipment are used.

Managers must ensure that all equipment is:

- Suitable for the intended task (Has the required lifting capacity for the work at hand)
- Maintained and inspected regularly (By the contractor plant yard or reliable mechanic)
- Operated only by trained personnel

For example, cranes used to lift cladding panels must operate under a formal lifting plan supervised by a competent lifting supervisor. (Lifts in this area are often provided and supervised by 'Davies Cranes').

3.7 Workplace Welfare and Traffic Management

The Workplace (Health, Safety and Welfare) Regulations 1992 require adequate welfare facilities to be provided. Employers must ensure that workers have access to:

- Toilets and washing facilities, canteen etc
- Drinking water
- Rest areas and welfare cabins

Traffic management is also essential due to the residential location of the site, Vehicle movements should be controlled through segregated pedestrian routes, barriers, signage and through the use of trained banksmen.

4. CDM Regulations 2015 and Their Application to the Project

The Construction (Design and Management) Regulations 2015 provide the framework for managing health and safety throughout the lifecycle of a construction project (HSE, 2015).

The regulations place duties on several parties, including the client, principal designer and principal contractor, the client must ensure that sufficient time and resources are allocated to the project and that competent professionals are appointed. The principal designer is responsible for eliminating risks during the design phase, while the principal contractor manages health and safety during construction.

For the Croft Street Block 2 project, the principal designer must consider how design decisions affect construction safety, e.g., selecting prefabricated cladding components could reduce the amount of work carried out at height and therefore reduce risks to workers.

The principal contractor must develop a detailed Construction Phase Plan before work begins, this document should outline how health and safety will be managed throughout the project and include risk assessments, emergency procedures and site rules.

Since residents may remain within the building during refurbishment works, additional controls will be necessary. These may include:

- Segregating residents from work areas
- Restricting access to hazardous zones
- Installing temporary fire alarms and signage
- Maintaining clear emergency escape routes

Regular communication between contractors will also be essential to prevent overlapping high-risk activities, coordination meetings and toolbox talks should be held regularly to ensure all workers understand site hazards and procedures.

CDM also requires the preparation of a Health and Safety File at project completion, this file will contain information relating to the fire systems, cladding materials, other intended works, maintenance procedures and future safety considerations. This information is essential for ensuring the long-term safe management of the building.

By following the CDM Regulations effectively, the project team can reduce risks, improve communication and create a safer working environment for both workers and residents.

5. Conclusion

The retrofit of Croft Street Block 2 presents significant health and safety challenges due to the scale of the refurbishment works and the high-rise residential nature of the building, activities such as cladding installation and internal refurbishment introduce risks associated with working at height, hazardous substances, manual handling and overall on and off site safety.

The Building Safety Act and Building Safety (Wales) Bill are highly relevant to this project and will significantly influence how it is planned and managed, these regulations promote accountability, fire safety and improved risk management within higher-risk residential buildings.

Compliance with health and safety legislation requires more than understanding legal duties, effective management procedures, worker training, supervision and communication are essential to ensuring a safe working environment. Site safety issues vary from site to site and safety plans should be tailored to the specific site, the legislations and training options I have discussed above are specific to the tasks that will be carried out during this retrofit. The CDM regulations provide a structured framework for managing safety throughout the project lifecycle and reducing risks through careful planning and coordination.

Through the implementation of robust health and safety procedures and compliance with relevant legislation and training requirements, UWTSD Construction can ensure that the Croft Street Block 2 retrofit project is completed safely, efficiently and in accordance with legal requirements.

6. Glossary of Terms

- **BSR** – Building Safety Regulator
- **CDM** – Construction (Design and Management) Regulations
- **COSHH** – Control of Substances Hazardous to Health
- **CSCS** – Construction Skills Certification Scheme
- **HSWA** – Health and Safety at Work etc. Act 1974
- **LOLER** – Lifting Operations and Lifting Equipment Regulations
- **PUWER** – Provision and Use of Work Equipment Regulations
- **RAMS** – Risk Assessment and Method Statement
- **PPE** – Personal Protective Equipment
- **RPE** – Respiratory Protective Equipment
- **MHSWR** - Management of Health and Safety at Work Regulations

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Site Images



Proposed



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