

Trainee Health and safety officer

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

Introduction

This report examines the health and safety considerations associated with the proposed refurbishment and retrofit works at Croft Street Block 2 in Swansea. The project forms part of Swansea Council's wider programme to modernise ageing residential tower blocks constructed during the 1960s (Swansea Council, 2025). The refurbishment work includes installing new kitchens and bathrooms, fitting fire sprinkler systems and applying external weather-proof cladding to improve energy efficiency and fire performance (Wales Online, 2024).

The project presents significant health and safety challenges because the building is a high-rise occupied residential structure. Construction activities will take place while residents remain in occupation, increasing risks associated with fire safety, asbestos exposure, work at height, access control and resident welfare. This report evaluates the relevance of the Building Safety Act 2022 and the Building Safety (Wales) Bill, discusses the most applicable health and safety legislation for the project and explains how the Construction (Design and Management) Regulations 2015 can be implemented to improve safety and reduce risk.

Relevance of the Building Safety Act and Building Safety (Wales) Bill

The Building Safety Act 2022 was introduced following the Grenfell Tower tragedy to improve accountability, fire safety and regulatory control within higher-risk residential buildings (UK Government, 2022). Although Wales has devolved powers regarding building regulation, the legislation remains highly influential for Welsh residential high-rise projects and has shaped

the development of the Building Safety (Wales) Bill (Welsh Government, 2025).

Croft Street Block 2 is considered a higher-risk building because it exceeds 18 metres in height and contains multiple residential dwellings (Swansea Council, 2025). The retrofit project therefore falls directly within the type of development targeted by the new building safety regime. The work involving external cladding systems and fire sprinkler installation is particularly significant because these areas were identified as major failures during investigations into the Grenfell disaster (UK Government, 2022).

One of the most important impacts of the Building Safety Act on this project is the increased focus on accountability and competence. Duty holders including the client, principal designer and principal contractor must demonstrate that they possess the relevant skills, knowledge and experience to manage building safety risks effectively (Health and Safety Executive, 2024a). For Swansea Council and appointed contractors, this means ensuring only competent contractors and designers are employed for specialist activities such as cladding installation, fire stopping and sprinkler systems.

The legislation also strengthens requirements relating to fire safety compliance. Any cladding installed on the building must meet strict fire resistance standards and should be supported by appropriate testing and certification. Swansea Council has already confirmed that non-combustible cladding systems are being used within its tower block improvement programmes (Swansea Council, 2025). Contractors must therefore ensure all materials are correctly specified, installed and inspected to prevent future fire spread risks.

Another major requirement introduced through the Building Safety Act is the “golden thread” of information. This refers to maintaining accurate digital records throughout the building lifecycle (UK Government, 2022). During this project, information relating to sprinkler installation, fire doors, compartmentation, structural modifications and cladding systems would

need to be carefully recorded and retained. These records support future maintenance and allow emergency services to understand the building's fire protection systems.

Resident engagement is also central to the legislation. Since residents will remain in occupation during the refurbishment works, contractors and managers must ensure effective communication regarding temporary fire procedures, access arrangements and disruption to services. Failure to communicate effectively could increase resident anxiety and create confusion during emergencies. Managers should therefore organise consultation meetings, issue written updates and provide contact procedures for resident concerns.

The Building Safety (Wales) Bill further reinforces the requirement for ongoing building safety management after construction work is completed (Welsh Government, 2025). This means the project must not only deliver safe construction practices but also ensure the completed building remains safe for long-term occupation. The installation of fire sprinklers, improved compartmentation and upgraded fire protection systems will support compliance with these long-term obligations.

Overall, the Building Safety Act and Building Safety (Wales) Bill are highly relevant to this project because they directly influence how higher-risk residential refurbishment projects are designed, managed and monitored throughout their lifecycle.

Health and Safety Legislation Applicable to the Project

The Health and Safety at Work etc. Act 1974 is the primary legislation governing construction health and safety within the United Kingdom. The Act places a duty on employers to protect employees and anyone affected by construction activities, including residents, visitors and members of the public (Health and Safety Executive, 2024b). Due to the occupied nature of Croft Street Block 2, compliance with the Act is essential.

From a managerial perspective, compliance requires effective planning, supervision and communication. Site managers would need to undertake comprehensive risk assessments before work begins and continuously review them as conditions change. Because residents remain within the building during refurbishment works, managers must assess risks associated with dust, noise, vibration, fire and restricted access.

Managers are also responsible for ensuring workers are competent and adequately trained. Operatives carrying out construction work should possess valid Construction Skills Certification Scheme cards appropriate to their trade. Site managers should hold Site Management Safety Training Scheme qualifications, while first aiders must receive accredited training. Regular toolbox talks should reinforce site-specific hazards such as asbestos exposure, manual handling and fire prevention procedures.

The Management of Health and Safety at Work Regulations 1999 support the Health and Safety at Work etc. Act 1974 by requiring employers to establish formal arrangements for planning, monitoring and reviewing safety procedures (Health and Safety Executive, 2024c). For this project, managers should implement regular safety inspections, accident reporting systems and emergency evacuation procedures.

The Work at Height Regulations 2005 are especially relevant because external cladding installation will involve extensive work at height using scaffolding and mobile elevated work platforms (Health and Safety Executive, 2024d). Falls from height remain one of the leading causes of fatalities within the construction industry, making compliance critical.

Managers must ensure scaffolding is erected by competent Construction Industry Scaffolders Record Scheme-qualified scaffolders and inspected by a competent person before first use, every seven days and after adverse weather conditions (Health and Safety Executive, 2024d). Safe access routes, edge protection, guard rails and toe boards should be maintained throughout the project. Debris netting and exclusion zones would also be necessary to protect residents and pedestrians from falling materials.

The Control of Asbestos Regulations 2012 are highly relevant because the building was constructed during the 1960s when asbestos-containing materials were commonly used in residential construction (Health and Safety Executive, 2024e). Refurbishment work involving kitchens, bathrooms and service risers could disturb asbestos insulation boards, textured coatings or pipe lagging.

Managers must arrange a refurbishment and demolition asbestos survey before intrusive works begin. If asbestos is identified, licensed asbestos contractors should carry out removal works using controlled procedures including enclosure systems, negative pressure units and air monitoring. Residents may need temporary relocation during high-risk asbestos removal operations.

Failure to properly manage asbestos exposure could result in serious illnesses such as mesothelioma and asbestosis. Managers should therefore implement permit-to-work systems and ensure workers receive asbestos awareness training before commencing work.

The Regulatory Reform (Fire Safety) Order 2005 is another key legal requirement because fire protection systems within the occupied building may be temporarily disrupted during refurbishment works (UK Government, 2005). Managers must therefore continuously review fire risk assessments and ensure emergency escape routes remain accessible throughout construction.

Hot works such as welding or cutting should only take place under permit systems with suitable fire extinguishers and fire watches in place. Combustible materials should be stored safely away from ignition sources, particularly during cladding installation activities.

Manual handling risks are also significant due to the movement of kitchen units, bathroom fittings and cladding materials. Under the Manual Handling Operations Regulations 1992, managers must reduce lifting

risks through mechanical handling equipment, team lifting procedures and manual handling training (Health and Safety Executive, 2024f).

The Provision and Use of Work Equipment Regulations 1998 require all construction equipment and tools to be suitable, maintained and operated by trained personnel (Health and Safety Executive, 2024g). This includes cutting tools, lifting equipment, power tools and hoists used during refurbishment works.

The Control of Substances Hazardous to Health Regulations 2002 are relevant because workers may be exposed to silica dust, paints, adhesives and cleaning chemicals (Health and Safety Executive, 2024h). Dust suppression measures such as wet cutting and extraction systems should therefore be implemented. Workers must also receive training regarding safe handling procedures and the correct use of personal protective equipment.

Overall, compliance with health and safety legislation requires a proactive management approach involving training, supervision, inspection, communication and continuous monitoring throughout the project.

Compliance with Construction (Design and Management) Regulations 2015

The Construction (Design and Management) Regulations 2015 provide the legal framework for managing health and safety throughout construction projects (Health and Safety Executive, 2024a). The Construction (Design and Management) Regulations 2015 are particularly important for the Croft Street Block 2 refurbishment because of the scale of the works, the occupied nature of the building and the complexity of the fire safety improvements.

Under the Construction (Design and Management) Regulations 2015, Swansea Council acts as the client and must ensure suitable

arrangements are in place for managing the project safely. This includes appointing competent duty holders, allocating sufficient time and resources and ensuring effective coordination between all parties involved (Health and Safety Executive, 2024a).

The principal designer is responsible for managing health and safety during the design phase. Designers should identify foreseeable risks and eliminate or reduce them wherever possible. For example, selecting prefabricated cladding panels could reduce the amount of time workers spend operating at height. Designers should also ensure materials meet fire safety standards and consider long-term maintenance requirements.

The principal contractor is responsible for coordinating site safety during construction activities. Before work begins, a detailed construction phase plan must be prepared identifying project hazards, control measures and emergency arrangements. Because the building remains occupied, the construction phase plan should include procedures for protecting residents from dust, noise, falling materials and fire hazards.

Traffic management is another important requirement under the Construction (Design and Management) Regulations 2015. Construction vehicles delivering scaffolding, cladding materials and waste skips create risks for residents and pedestrians within the surrounding area. Managers should establish segregated pedestrian routes, designated loading areas and controlled delivery schedules. Banksman should supervise reversing vehicles to reduce collision risks.

The Construction (Design and Management) Regulations 2015 also require suitable welfare facilities for workers. Site managers must provide clean toilets, handwashing facilities, drinking water, rest areas and changing facilities (Health and Safety Executive, 2024a). Although welfare arrangements are sometimes difficult to provide on refurbishment projects, they remain a legal requirement and contribute significantly to worker wellbeing and morale.

Communication is essential under the Construction (Design and Management) Regulations 2015. Daily briefings and toolbox talks should be used to discuss changing site conditions and highlight specific hazards. Contractors working inside occupied flats should use permit systems and ensure residents receive advance notice before intrusive work begins.

Monitoring and inspection procedures are equally important. Managers should conduct regular scaffold inspections, fire safety checks and site audits to identify unsafe conditions. Near misses and accidents must be investigated thoroughly to prevent recurrence.

A further requirement under the Construction (Design and Management) Regulations 2015 is the preparation of a health and safety file at project completion. This file should contain information relating to sprinkler systems, cladding specifications, fire stopping details and maintenance procedures. The health and safety file supports future building management and forms part of the building's long-term safety strategy.

Through effective implementation of the Construction (Design and Management) Regulations 2015, the project can significantly reduce risks to workers, residents and the public while improving overall safety performance and construction quality.

Conclusion

The refurbishment of Croft Street Block 2 presents complex health and safety challenges because it involves extensive high-rise construction work within an occupied residential building. The Building Safety Act 2022 and Building Safety (Wales) Bill are highly relevant due to the building's classification as a higher-risk residential structure and the nature of the proposed fire safety and cladding improvements.

A range of health and safety legislation applies to the project, including the Health and Safety at Work etc. Act 1974, Work at Height Regulations 2005, Control of Asbestos Regulations 2012 and Regulatory Reform (Fire Safety) Order 2005. Effective compliance depends upon strong management systems, competent contractors, worker training and ongoing communication with residents.

The Construction (Design and Management) Regulations 2015 provide the overall framework for safely managing the project. Through careful planning, competent duty holders, risk reduction during design and effective monitoring during construction, the refurbishment project can be completed safely while protecting workers, residents and members of the public.

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