



Prifysgol Cymru
Y Drindod Dewi Sant
University of Wales
Trinity Saint David

Name:	James Gadd
Student Number:	2510906
Student Email:	2510906@student.uwtsd.ac.uk
Module:	Health, Safety and Welfare
Module Code:	ACBA4023
Submission Date:	07/05/2026
Assignment Title:	Trainee Health and Safety Officer

Contents

1. Introduction	page 3
2. Building Safety Act 2022 & Building Safety (Wales) Legislation...	page 4-5
3. Applicable Health & Safety Legislation	page 7-13
Appendix 1 – Health and Safety at Work Act 1974	
Appendix 2 – Control of Asbestos Regulations 2012	
Appendix 3 – Working at Height Regulations 2005	
Appendix 4 – Provision and Use of Work Equipment Regulations 1998	
Appendix 5 – Lifting Operations and Lifting Equipment Regulations 1998	
Appendix 6 – Control of Substances Hazardous to Health Regulations 2002	
4. Compliance of CDM Regulations 2015.....	page 14-16
5. Glossary of terms.....	page 17
6. Appendices.....	page 18
7. Reference List.....	page 19-21

1. Introduction

This report examines health and safety concerns and considerations associated with the retrofit of Block 2, Croft Street, a high-rise residential tower block in Swansea City Centre. The refurbishment includes rip out and installation of new kitchens and bathrooms within occupied flats.

A new fire sprinkler system will be installed throughout the building, alongside weatherproof external cladding to improve energy efficiency, thermal performance, and aesthetics.

The project presents complex risk management challenges due to the building's height, the intrusive nature of the works, and the need to keep the building live and occupied during construction.

This report evaluates the relevance of the Building Safety Act 2022 and Building Safety (Wales) in relation to the project and their potential impact. It also identifies key applicable legislation and explains how the CDM Regulations 2015 will be implemented to reduce risks and improve the health and safety of people on and around the site.



Proposed



Existing

2. Relevance of the Building Safety Act 2022 and Building Safety (Wales) Legislation

The Building Safety Act 2022 was brought in following the Grenfell tower tragedy in 2017. It relates directly to higher risk residential buildings, defined as over 18 metres high, or 7 stories. Therefore, Croft Street Block 2 fits under this category, making this act highly relevant.

The Building Safety Wales legislation bolsters BSA by strengthening the Welsh specific regulatory powers, particularly around fire safety and resident engagement (GOV.UK 2023).

2.2 Key Impacts on this project

2.2.1 The Accountable Person (AP)

For Croft Street Block 2, Swansea Council (as the building owner) will act as the Accountable Person (AP). They must:

- Review and manage building safety risks (Fire spread and potential structural failure)
- Demonstrate how the risks are controlled.
- Make sure the “Golden Thread” of information is maintained during the retrofit

UWTSD Construction are responsible for supplying accurate, up to date information to support the above.

(GOV.UK 2023)

2.2.2 The Golden Thread of Information

This project involves upgrading of fire critical systems (sprinkler system and external cladding). The Golden Thread requires:

- Detailed design specification for the proposed cladding installation
- Inspection reports, Installation records, product certification
- As-built drawings for the sprinkler system
- Competencies and training certification for the installation company

Failure to maintain accurate records could result in enforcement action or the building may not get signed off (GOV.UK. (n.d.)).

2.2.3 Resident Engagement

Any retrofit works being undertaken in occupied buildings require:

- Clear communication of work scheduled with the residents
- Minimal disruption and creation of noise and dust
- Ensure plan is in place for safe access and egress for residents
- Procedure in place for any complaints or safety concerns

The BSA emphasises the need for resident involvement, so UWTSD Construction need to work closely with Swansea Council to maintain the trust and safety (*Morgan, et al (n.d.)*).

2.2.4 Building Safety Regulator (BSR)

The BSR in Wales regulates the professional building control profession, but the Local Authority oversee the safety during construction, especially for higher risk buildings (*GOV.WALES. 2026*).

2.2.5 Competence Requirements

The BSA act, competence is a mandatory requirement and has strict competence standards for:

- Designers of the cladding system
- Fire Safety engineers
- Installers of the fire critical items (Sprinklers, Fire Doors, insulation etc)

UWTSD Construction will be responsible for verifying training qualifications and certificates for all sub-contractors.

Specifically, section 11F of the BSA secondary legislation introduces the general competence requirements, for everyone in the construction industry (*Boxall, M. 2024*).

2.2.6 Impacts Upon Cladding Works

Given the sensitivity around cladding since the Grenfell Disaster, the act requires:

- Use of fully compliant materials that fall under British Standards
- Full documentation of its fire rating/performance
- Installation by fully trained and competent staff
- Inspection and sign off

If there is deviation from the original design, this needs to be reported and re-approved. If the cladding is installed and is defective, or does not meet the relevant standards, the cost could fall to yourselves to rectify (*flywheel@conscious.co.uk* 2023).

3. Applicable Health and Safety Legislation



Photo taken from <https://ohrh.law.ox.ac.uk/the-bill-of-rights-bill-playing-fast-and-loose-with-the-belfast-good-friday-agreement-again/>

Several pieces of legislation apply to this retrofit project. Below is the most relevant information, with examples of how compliance must be ensured from a managerial perspective.

3.1 Appendix 1 – Health and Safety at Work Act 1974 (HSWA)

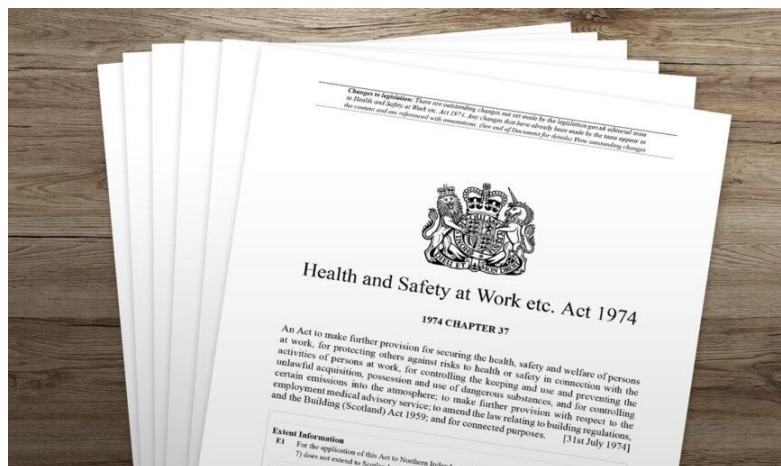


Image taken from <https://www.ier.org.uk/comments/the-health-and-safety-at-work-act-at-50/>

The HSWA 1974 is the basis of UK health and safety law. Employers are required to take all reasonably practicable steps to protect the health, safety, and welfare of employees, subcontractors, and members of the public who could be impacted by the work activities.

Managerial compliance requires structured H&S management systems, often contractors use a cloud-based construction management software. This usually contains a training matrix housing all the staffs relevant training certification. The system will also contain project specific information is stored centrally, such as:

- Project specific RAMS
- HSE notifications
- Sub-contractor information
- Construction Phase Plan (CPP)
- Site Plans
- Operational Procedures
- Traffic Management plan

UWTSD Construction would need to ensure you have introduced safe systems of work and have suitable RAMS in place. You would also need to appoint a competent person to manage the project, such as a senior site supervisor or site manager. Usually, the appointed person would have SSSTS or SMSTS training for the position (*TUC 2022*).

3.2 Appendix 2 – Control of Asbestos Regulations 2012 (CAR 2012)



Photo taken from <https://www.linkedin.com/pulse/revisiting-control-asbestos-regulations-2012-nick-garland>

Given the age of the Croft Street Block 2 building, dating back to the early 60's, you can almost guarantee that there will be ACM's present throughout the building which will pose an extremely high risk for the proposed retrofit works.

The building should have an asbestos register which staff will need to sign to confirm they have read it. I would recommend getting an R&D survey undertaken to identify exactly what ACM's have been identified in the specific areas and surfaces being worked on that may be disturbed. In some cases, the contractor may consider providing their staff with some basic Asbestos awareness training.

Some of the works may require instructing a licenced asbestos removal contractor to undertake any asbestos removal works. Asbestos can be found almost anywhere in a building like this, from floor tiles, to ceilings, internal boxing to door headers and toilet cisterns, so it's extremely important to know what you are dealing with (James-jj 2024).

3.3 Appendix 3 – Working at Height Regulations 2005 (WAH 2005)



Photo taken from <https://www.peri.ltd.uk/products/products-overview/scaffolding-homepage/scaffoldingsystems.html>

Installation of the external cladding and the sprinkler pipework introduces a significant working from height risk. You will need to instruct a CIRCS qualified scaffolding company for the erection of a fixed scaffold to the façade of the tower block. I would probably avoid the use of MEWPs again given the built-up nature of the environment, they would not be practical.

The scaffolding should be inspected daily or weekly (depending on the scaffold) by a competent person to ensure there have been no changes or adaptations. The scaffold should then have a tag affixed dated and signed following the inspection. Given the location of the flats in the middle of the city centre, it would be prudent to ensure debris netting is fitted to prevent any falling materials, tools etc. onto the public walkway beneath.

In terms of staff safety, the scaffold should also be fitted with toe boards and edge protection and fall arrest equipment, usually harness and lanyards should be used as an extra precaution (*Kee Safety 2025*).

3.4 Appendix 4 – Provision and Use of Work Equipment Regulations 1998 (PUWER)



Image taken from <https://trainingexpress.org.uk/power-regulations-the-precise-course/>

PUWER applies to all tools such as drills, saws, MEWPs and Lifting Equipment. All equipment being used needs to be suitable for the tasks being undertaken, and pre use checks should be carried out prior to use. Construction tools should undergo regular maintenance and as a minimum be PAT Tested every 3 months as good practice, however this is not a legal requirement. Records should be kept centrally for the equipment checks carried out (*Health and Safety Executive 2024*).

Staff may also have HAVS training if they are regularly using power tools. Certain equipment has HAVS ratings so once trigger time has been reached for the piece of equipment, the recommended breaks should be introduced to prevent potential exposure to HAVS (*HASpod 2018*).

3.5 Appendix 5 – Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)



<https://humanfocus.co.uk/blog/what-is-loler-lifting-operations-and-lifting-equipment-regulations-1998/>

LOLER is relevant in this project as there will likely be a need for hoists to transport materials to upper floors, such as the cladding for example. Any hoists or forklifts used on the project would be subject to examination every 6 to 12 months by a competent person.

Only trained personnel should be using the equipment, and there should be clear exclusion zones set out during the lifting operations. Under this regulation, duty holders are responsible for ensuring that all lifting equipment is suitable for its intended use and undergoes routine inspections. (Alex 2025).

3.6 Appendix 6 – Control of Substances Hazardous to Health (COSHH) Regulations 2002



Image taken from <https://www.staffsureuk.com/wp-content/uploads/2020/01/cosh.jpg>

COSHH applies to adhesives, sealants, cleaning chemicals, and dust from cutting materials, all of which will be present during this retrofit programme. Any chemical adhesives must be stored within designated COSS cabinets, and staff should have the relevant training on hazard identification and handling of the materials.

Drilling into the concrete walls could generate respirable silica dust, so you may want to consider what control measures are put in place, such as water suppression or RPE equipment to prevent inhalation (*Health and Safety Executive Control of exposure to silica dust: A guide for employees. n.d*).

4. Compliance of CDM Regulations 2015



Image taken from <https://i.ytimg.com/vi/M8UL7upCWr4/maxresdefault.jpg>

The CDM Regulations 2015 are applicable to all construction activities and assign legal duties to clients, designers, and contractors. For a high-rise block of flats such as Croft Street Block 2, CDM compliance is essential to reduce the risks.

4.1 Client Duties

Swansea Council would be responsible for appointing a Principal Designers (PD) and a Principal Contractor (PC). All pre-construction information, such as asbestos surveys, structural drawings, cladding, sprinkler systems and bathroom specifications should be provided by the client.

The client is also responsible for appointing competent duty holders and ensuring adequate time, planning, and resources are provided for the project. A realistic programme needs to be provided to prevent potential delays, especially with critical works such as the sprinkler system being fitted and then commissioned (*HSE 2015*).

The client may need to submit an F10 notification to the HSE if the construction exceeds thirty working days *and* had more than twenty workers, or if over five hundred person days are exceeded (*Sullivan, N. 2024*).

4.2 Principal Designer Duties

The PD has a duty to coordinate health and safety during the pre-construction stage, as controlling risks at this point is vital to reducing hazards throughout the project. For example, the specification of the cladding is key, ensuring that it is on-

combustible and meets British safety standards will reduce the need for other controls to be implemented.

The PD should identify any other risks, for example any fire stopping required around sprinkler pipes. The PD assists the client in gathering and coordinating pre-construction information and must also provide necessary details to the Principal Contractor to support the construction phase plan (*HSE 2015*).

4.3 Principal Contractor Duties

During the construction phase, the Principal Contractor oversees health and safety on site and must prepare a comprehensive Construction Phase Plan, which should outline emergency procedures, site induction processes, traffic management, site logistics and rules and all other project information. This is a legal requirement under CDM 2015.

The CPP is a live document and gets updated by the PC as and when changes arise. The PD is also responsible for provision of site set up and welfare facilities ensuring segregation is put in place to protect residents and the public (*Minett, A. 2023*).

4.4 Contractor Duties

Contractors must follow the CPP, and have to provide RAMS for all of their works. They must ensure all their workers are fully trained and competent. Any near misses and incidents must be reported by the contractor and recorded.

Some sites and clients require staff to hold a CSCS card. These cards demonstrate that workers have the appropriate training and qualifications for their role. While not a legal requirement, they can help facilitate access to sites with stricter client requirements.

CDM Regulations in Practice

Working in an Occupied Building

- Clear segregation between residents and working areas
- Temporary fire alarms and muster points whilst existing system is disabled
- Daily cleaning in public areas to remove dust and debris

Cladding Installation

- Safe lifting plans to be put in place for lifting operations
- Scaffold designs and calculations in place and signed off prior to erection
- Daily/weekly scaffold inspections to be undertaken by competent person
- Fire safe storage of insulation and combustible materials

Sprinkler Installation

- Clear communication and co-ordination with fire system sub-contractor
- Ensure fire stopping installed around the wall penetrations
- Testing and commissioning before handover to the client

Kitchens and Bathrooms

- Ensuring all services are isolated
- Safe removal and disposal of old units
- Dust control measures implemented (Floor protection, vacuum attachments, water suppression)

Resident Communications

- Well sign posted access routes and temporary access arrangements
- Notice boards with contact information and work schedules
- Procedures for reporting and complaints

Glossary of terms

- AP – Accountable Person
- ACM's – Asbestos Containing Materials
- BSA – Building Safety Act 2022
- BSR – Building Safety Regulator
- CAR 2012 – Control of Asbestos Regulations 2012
- CDM 2015 – Construction Design and Management Regulations 2015
- CISRS – Construction Industry Scaffolders Record Scheme
- COSHH – Control of Substances Hazardous to Health Regulations 2002
- CPP – Construction Phase Plan
- CSCS – Construction Skills Certification Scheme
- HAVS – Hand and Arm Vibration Syndrome
- H&S – Health and Safety
- HSWA – Health and Safety at Work Act 1974
- HSE – Health and Safety Executive
- LOLER – Lifting Operations and Lifting Equipment Regulations 1998
- MEWP – Mobile Elevating Work Platform
- PC – Principal Contractor
- PD – Principal Designer
- PUWER – Provision and Use of Work Equipment Regulations 1998
- RAMS – Risk And Method Statements
- R&D Survey – Refurbishment and Demolition Survey
- RPE – Respiratory Protective Equipment
- SMSTS – Site Management Safety Training Scheme
- SSOW – Safe Systems of Work
- SSSTS – Site Supervision Safety Training Scheme
- WAH 2005 – Working at Height Regulations 2005

Appendices

Appendix 1 – HSWA 1974 <https://www.hse.gov.uk/legislation/hswa.htm>

Appendix 2 – CAR 2012 <https://www.hse.gov.uk/pubns/books/l143.htm>

Appendix 3 – WAH 2005 <https://www.hse.gov.uk/work-at-height/the-law.htm>

Appendix 4 – PUWER 1998 <https://www.hse.gov.uk/work-equipment-machinery/puwer.htm>

Appendix 5 – LOLER 1998 <https://www.hse.gov.uk/work-equipment-machinery/loler.htm>

Appendix 6 – COSHH 2002 <https://www.hse.gov.uk/coshh/>

Reference List:

- Alex (2025). *CHAS - Contractors' Health and Safety Assessment Scheme*. [online] CHAS. Available at: <https://www.chas.co.uk/blog/lifting-operations-regulations-explained/> [Accessed 07/05/2026]
- Boxall, M. (2024). *Understanding Building Safety Act competency requirements*. [online] Constructionline. Available at: <https://www.constructionline.co.uk/insights/blog/understanding-building-safety-act-competency-requirements/> [Accessed 05/05/2026]
- Flywheel@conscious.co.uk (2023). *New legislation on building cladding: what owners need to know - Hamlins LLP*. [online] Hamlins LLP. Available at: <https://hamlins.com/insight/new-legislation-on-building-cladding-what-owners-need-to-know/> [Accessed 05/05/2026]
- GOV.UK (2023). *Safety in high-rise residential buildings: Accountable persons*. [online] GOV.UK. Available at: <https://www.gov.uk/guidance/safety-in-high-rise-residential-buildings-accountable-persons> [Accessed 05/05/2026]
- GOV.UK (2023). *Criteria for being a higher-risk building during the occupation phase of the new higher-risk regime*. [online] GOV.UK. Available at: <https://www.gov.uk/guidance/criteria-for-being-a-higher-risk-building-during-the-occupation-phase-of-the-new-higher-risk-regime> [Accessed 07/05/2026]
- GOV.UK. (n.d.). *Keeping information about a higher-risk building: the golden thread*. [online] Available at: <https://www.gov.uk/guidance/keeping-information-about-a-higher-risk-building-the-golden-thread> [Accessed 05/05/2026]
- GOV.WALES. (2026). *Regulation of the building control profession* | GOV.WALES. [online] Available at: <https://www.gov.wales/regulation-building-control-profession> [Accessed 05/05/2026]
- HASpod (2018). *Understanding HAVS Trigger Times*. [online] Haspod.com. Available at: <https://www.haspod.com/blog/vibration/understanding-havs-trigger-times> [Accessed 07/05/2026]
- Health and Safety Executive (2024). *Statistics - about HSE Statistics*. [online] www.hse.gov.uk. Available at: <https://www.hse.gov.uk/statistics/overview.htm> [Accessed 05/05/2026]

- Health and Safety Executive Control of exposure to silica dust: A guide for employees. (n.d.). Available at: <https://www.hse.gov.uk/pubns/indg463.pdf> [Accessed 07/05/2026]
- Health and Safety Executive (2024). *Provision and Use of Work Equipment Regulations 1998 (PUWER) - overview - HSE*. [online] Hse.gov.uk. Available at: <https://www.hse.gov.uk/work-equipment-machinery/puwer-overview.htm> [Accessed 07/05/2026]
- HSE (2015). *Health and safety in the film, theatre and broadcasting industries - CDM roles and duties*. [online] www.hse.gov.uk. Available at: <https://www.hse.gov.uk/entertainment/cdm-2015/roles-and-duties.htm> [Accessed 07/05/2026]
- HSE (2015). *Construction - Principal designers: roles and responsibilities CDM 2015*. [online] Hse.gov.uk. Available at: <https://www.hse.gov.uk/construction/cdm/2015/principal-designers.htm> [Accessed 07/05/2026]
- james-jj and james-jj (2024). *Asbestos in 1960s & 70s houses - everything you need to know*. [online] Goodbye Asbestos. Available at: <https://www.goodbyeasbestos.co.uk/removing-asbestos-from-1960s-1970s-houses/> [Accessed 07/05/2026]
- Kee Safety (2025). *Working at Height Regulations UK 2025: Essential Compliance Checklist for Site Managers*. [online] Keesafety.co.uk. Available at: <https://keesafety.co.uk/working-at-height-regulations-uk-compliance-checklist-2025> [Accessed 07/05/2026].
- Minett, A. (2023). *Principal Contractor Responsibilities*. [online] CHAS. Available at: <https://www.chas.co.uk/blog/principal-contractor-responsibilities> [Accessed 07/05/2026]
- Morgan, D., Maddock, C., Musselwhite, C., Nallétamby, S. and Singleton, A. (n.d.). *OPTIMISED RETROFIT PROGRAMME*. [online] Available at: <https://www.gov.wales/sites/default/files/publications/2024-03/orp-case-study-active-building-centre-resident-engagement.pdf> [Accessed 05/05/2026]
- Sullivan, N. (2024). *What is an F10 Notification?* [online] CHAS. Available at: <https://www.chas.co.uk/blog/what-is-f10-notification/> [Accessed 07/05/2026]

- TUC (2022). *What Are My employer's Duties under the Health and Safety at Work Act?* [online] www.tuc.org.uk. Available at: <https://www.tuc.org.uk/guidance/what-are-my-employers-duties-under-health-and-safety-work-act> [Accessed 07/05/2026]