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Assignment Title:

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

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Glossary of Terms, Acronyms and Abbreviations

Term/ Acronym	Meaning
ACM	Aluminium Composite Material used in cladding systems.
CDM	Construction (Design and Management) Regulations 2015.
COSHH	Control of Substances Hazardous to Health Regulations 2002.
HASWA	Health and Safety at Work etc. Act 1974.
HSE	Health and Safety Executive.
HSQE	Health, Safety, Quality and Environment.
LOLER	Lifting Operations and Lifting Equipment Regulations 1998.
PPE	Personal Protective Equipment.
PUWER	Provision and Use of Work Equipment Regulations 1998.
RAMS	Risk Assessments and Method Statements.
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.
Retrofit	Refurbishment or upgrading of an existing building.
Scaffolding	Temporary structure used to provide safe access for work at height.
Toolbox Talk	Short safety briefing delivered to workers before tasks are carried out.
WAHR	Work at Height Regulations 2005.

2. Introduction

The construction industry is recognised as one of the most hazardous sectors, exposing workers and the public to risks such as working at height, electrical hazards and heavy equipment operations. Effective health and safety management is therefore essential to reduce risks and ensure compliance with legal responsibilities.

This report examines the health and safety considerations associated with the proposed retrofit of Croft Street Block 2, a residential tower block located in Swansea. The refurbishment works include recladding, fire safety upgrades, installation of new kitchens and bathrooms, and improvements to communal areas and external infrastructure.

Unlike new construction projects, retrofit works present additional challenges because they are carried out on existing occupied buildings. This increases the importance of fire safety, access control and resident protection during construction activities.

The report evaluates the relevance of key legislation, including the Building Safety Act 2022 and CDM 2015, and explains how these regulations influence safe working practices throughout the project.



Figure 1. Croft Street Block 2 during refurbishment works in Swansea (Author's own photograph, 2026).

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

The Building Safety Act 2022 and the proposed Building Safety (Wales) Bill are highly relevant to the Croft Street Block 2 retrofit project due to the nature of the building, and the scope of the refurbishment works. The project involves the refurbishment of an occupied high-rise residential tower block, including recladding works, fire safety upgrades and improvements to communal areas (Swansea Council, 2024). Following the Grenfell Tower tragedy, legislation related to high-rise residential buildings has become significantly stricter, with greater emphasis placed on fire prevention, accountability and resident safety (UK Government, 2022).

One of the main impacts of the legislation is the requirement to ensure that fire risks are properly managed throughout both the design and construction phases. External cladding systems must comply with current fire safety standards, and non-combustible materials should be used to reduce the risk of rapid fire spread (Hughes and Ferrett, 2020). In addition, upgraded fire safety systems such as sprinklers, smoke detection and improved compartmentation will help improve resident safety. The legislation also increases the responsibilities of designers, contractors and building managers, requiring clear documentation, risk assessments and effective communication with residents throughout the refurbishment process.

Table 1: Impact of Building Safety Legislation on the Croft Street Retrofit Project (Author's own table based on UK Government (2022) and Swansea Council (2024).

<i>Building Safety Requirement</i>	<i>Impact on the Croft Street Project</i>
<i>Fire safety management</i>	Fire safety systems, smoke detection and sprinkler upgrades are required to improve resident safety and protection.
<i>Cladding compliance</i>	Recladding works must use non-combustible materials to reduce the risk of external fire spread.
<i>Resident safety</i>	Additional planning and communication are required because the building will remain occupied during construction.
<i>Duty holder responsibilities</i>	Designers, contractors and building managers must maintain clear documentation and ensure compliance throughout the project.
<i>Building inspections and risk assessments</i>	Ongoing inspections and fire risk assessments are required during both the construction and occupation phases.
<i>Means of escape and evacuation</i>	Escape routes and access points must remain safe and unobstructed throughout the refurbishment works.

Table 1 demonstrates how the Building Safety Act affects both the technical and management aspects of the project. Emphasis is placed on fire prevention, resident safety and accountability throughout the refurbishment process.

4. Health and Safety Legislation Applicable to the Project

A wide range of health and safety legislation applies to the Croft Street Block 2 retrofit project due to the nature of the works being carried out and the fact that the building will remain occupied during construction. The project includes working at height, recladding works, refurbishment of kitchens and bathrooms, installation of fire safety systems and the use of lifting equipment and power tools. Effective management, supervision and training are therefore essential to ensure compliance with legislation and to reduce risks to workers, residents and visitors.

4.1. Health and Safety at Work Act 1974 (HASWA)

The Health and Safety at Work Act 1974 (HASWA) is the main piece of legislation governing workplace health and safety in the United Kingdom. Under this Act, employers have a duty to ensure, so far as is reasonably practicable, the health, safety and welfare of employees and members of the public (Hughes and Ferrett, 2020). In this project, contractors must provide safe systems of work, appropriate welfare facilities, site inductions and adequate supervision. As residents will remain in the building during refurbishment works, maintaining safe access routes and minimising disruption will be particularly important.

4.2. Construction (Design and Management) Regulations 2015 (CDM)

The Construction (Design and Management) Regulations 2015 are highly relevant to the Croft Street retrofit project, as they establish the responsibilities of the different duty holders involved in construction activities. Due to the complexity of the refurbishment works and the presence of residents within the building, effective planning, coordination and communication will be essential to ensure that risks are properly managed throughout the project lifecycle.

4.3. Work at Height Regulations 2005 (WAHR)

The Work at Height Regulations 2005 (WAHR) are highly relevant due to the recladding and external refurbishment works on the tower block. Scaffolding

systems must be properly designed, erected and inspected by competent persons before use and at regular intervals. Workers responsible for scaffolding inspections should hold appropriate qualifications, such as CISRS certification. Edge protection, guard rails and fall prevention systems must also be provided to minimise the risk of falls, which remain one of the leading causes of fatalities in the construction industry (HSE, 2023).



Figure 2. Site scaffolding and access controls at Croft Street Block 2 refurbishment project (Author's own photograph, 2026).

4.4. Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) apply where cranes and lifting equipment are used to transport cladding materials and construction components. Lifting operations must be properly planned and supervised by competent personnel, while lifting equipment must be regularly inspected and certified to ensure safe operation.

4.5. Provision and Use of Work Equipment Regulations 1998 (PUWER)

In addition, the Provision and Use of Work Equipment Regulations 1998 (PUWER) require all machinery and equipment used on site to be suitable, properly maintained and operated only by trained workers. This includes power tools, access equipment and electrical systems used during the refurbishment works.

4.6. Control of Substances Hazardous to Health Regulations 2002 (COSHH)

The Control of Substances Hazardous to Health Regulations 2002 (COSHH) are also relevant because refurbishment activities may expose workers to dust, mould, paints and other hazardous materials. Risk assessments, ventilation measures and appropriate personal protective equipment (PPE) must therefore be implemented to reduce exposure.

4.7. Manual Handling Operations Regulations 1992

Manual handling activities associated with moving materials, kitchen units and construction equipment must also be controlled in accordance with the Manual Handling Operations Regulations 1992. Workers should receive manual handling training, and mechanical lifting aids should be used where possible to reduce the risk of musculoskeletal injuries.

4.8. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Finally, the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) require employers to report serious accidents, injuries and dangerous occurrences to the relevant authorities. Proper incident reporting procedures and effective communication systems are therefore essential to ensure compliance and promote continuous improvement in health and safety performance.

The principal health and safety legislation applicable to the Croft Street retrofit project, together with their practical implications and compliance measures, are summarised in Table 2.

Table 2: Application of Health and Safety Legislation to the Croft Street Retrofit Project

Legislation	Main Requirement	Application to the Project	Compliance Measures
HASWA 1974	Protect health, safety and welfare	Occupied residential building	Safe systems of work, welfare facilities, inductions
CDM 2015	Manage construction risks and duty holder responsibilities	Coordination of retrofit works in occupied high-rise building	Construction Phase Plan, RAMS, communication and supervision
WAHR 2005	Prevent falls from height	Recladding and external works	Scaffolding inspections, edge protection, trained workers
LOLER 1998	Safe lifting operations	Lifting cladding materials	Planned lifting operations, certified equipment
PUWER 1998	Safe use of equipment	Power tools and machinery	Maintenance, training, competent operators
COSHH 2002	Control hazardous substances	Dust, mould, paints	PPE, ventilation, risk assessments
Manual Handling Regulations	Reduce lifting injuries	Moving materials and kitchen units	Manual handling training, lifting aids
RIDDOR 2013	Report serious incidents	Construction accidents	Incident reporting procedures

5. Application of CDM Regulations 2015 to the Project

The Construction (Design and Management) Regulations 2015 (CDM 2015) are highly relevant to the Croft Street Block 2 retrofit project due to the complexity of the refurbishment works, the presence of residents and the involvement of multiple contractors. The regulations place legal responsibilities on the client, designers and contractors to ensure that health and safety risks are properly managed throughout the project lifecycle. In this development, activities such as

recladding works, fire safety upgrades and lifting operations require effective planning, coordination, risk assessments and clear communication to minimise disruption and maintain the safety and welfare of residents, workers and visitors.

5.1. Client Responsibilities

Under the Construction (Design and Management) Regulations 2015 (CDM 2015), the client has a significant responsibility to ensure that health and safety is properly managed throughout the project. In the Croft Street Block 2 retrofit project, Swansea Council, acting as the client, must ensure that sufficient time, financial resources and competent personnel are available for the work to be carried out safely (HSE, 2015). The client is also responsible for appointing competent duty holders, providing adequate pre-construction information and ensuring effective communication with residents throughout the refurbishment process to maintain safety and minimise disruption.

5.2. Principal Designer Responsibilities

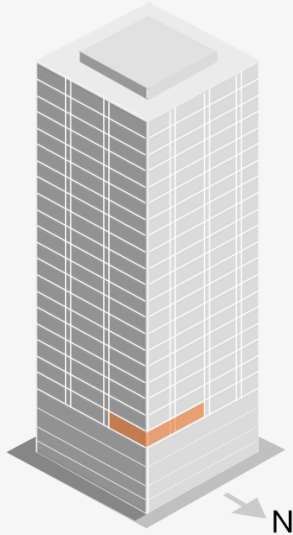
Under CDM 2015, the Principal Designer is responsible for coordinating health and safety during the pre-construction phase and reducing foreseeable risks through design decisions before construction begins (HSE, 2015). In the Croft Street Block 2 retrofit project, this includes decisions related to recladding works, fire safety upgrades and refurbishment within occupied residential areas. Following lessons learned from the Grenfell Tower fire, the use of non-combustible cladding materials and fire-resistant systems is essential to reduce fire risks and improve resident safety. The Principal Designer must also coordinate information between designers, contractors and other duty holders throughout the project.

Figure 3 highlights how combustible external cladding systems contributed to rapid fire spread during the Grenfell Tower fire, reinforcing the importance of safe material selection and fire-resistant design in modern retrofit projects.

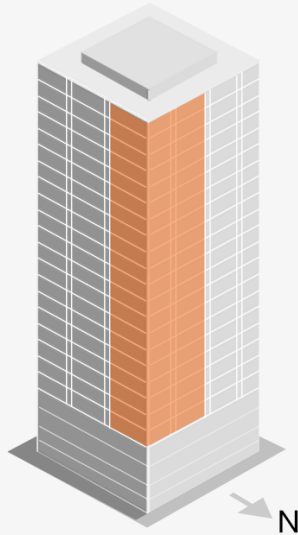
How quickly the fire spread

North and east faces engulfed in 99 minutes

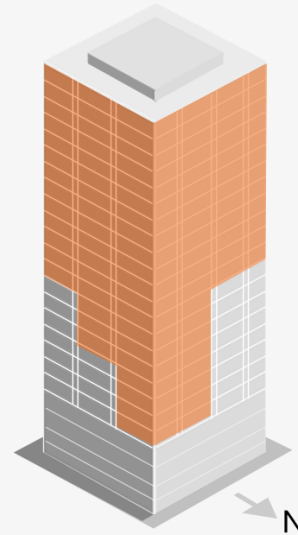
01:14 - 1 flat on fire



01:26 - 20 flats

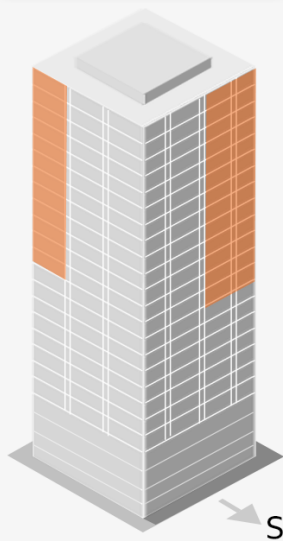


02:53 - 61 flats

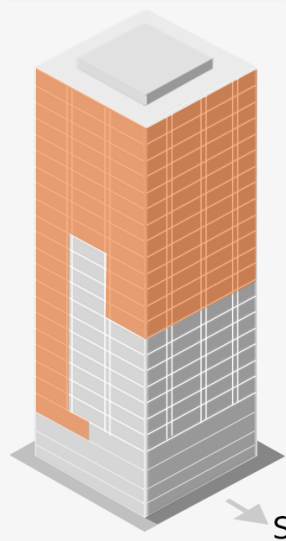


Flames then spread rapidly across south and west faces

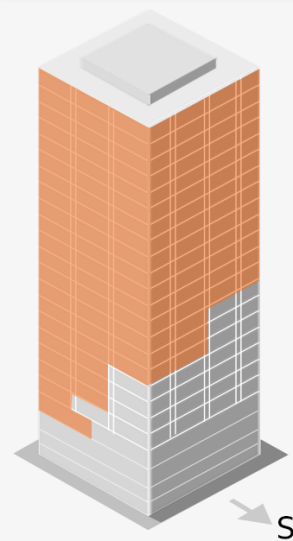
02:53 - 61 flats



03:43 - 92 flats



04:44 - 106 flats



Source: Grenfell Tower Inquiry/Dr Barbara Lane report

BBC

Figure 3: Rapid external fire spread during the Grenfell Tower fire, demonstrating the dangers associated with combustible cladding systems (BBC/Grenfell Tower Inquiry, 2017)

5.3. Principal Contractor Responsibilities

The Principal Contractor is responsible for managing health and safety during the construction phase of the Croft Street Block 2 retrofit project and ensuring compliance with CDM 2015. Key responsibilities include coordinating contractors, supervising site activities and implementing the Construction Phase Plan to manage health and safety risks (HSE, 2015). This includes preparing RAMS for recladding works, lifting operations and refurbishment activities within occupied areas.

Figure 4 demonstrates how RAMS procedures are coordinated between project managers, site supervisors and contractors to ensure effective planning, communication and control of health and safety risks during construction activities.

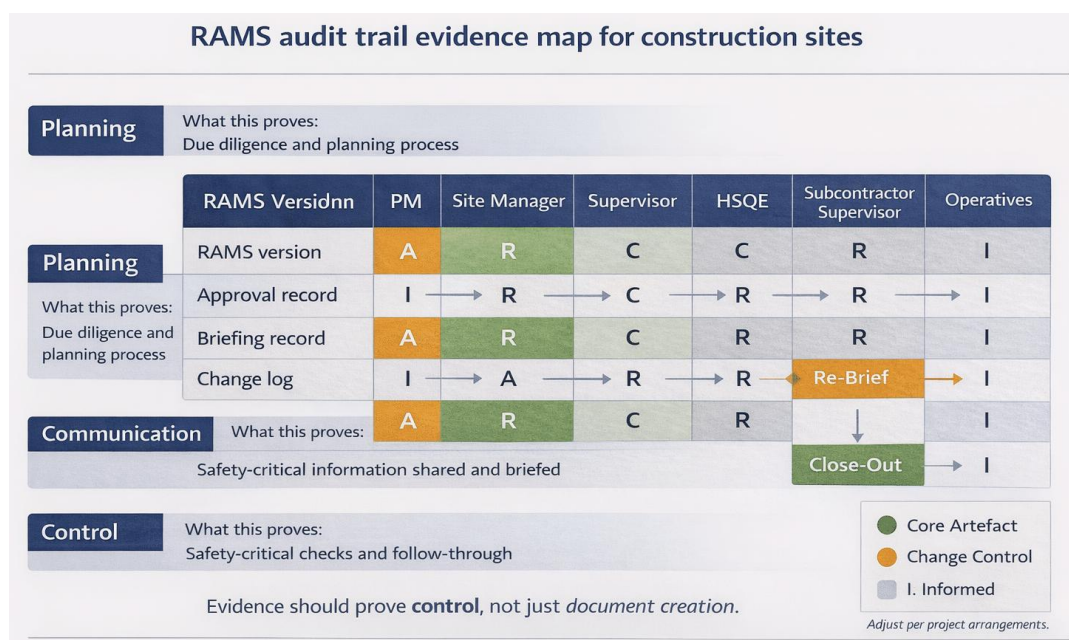


Figure 4: Example of a RAMS management and communication process used to coordinate health and safety responsibilities on construction projects.

Figure 4 demonstrates how RAMS procedures are coordinated between project stakeholders to ensure effective planning, communication and control of health and safety risks (Paperless Construction, 2024).

Where:

A = Accountable

R = Responsible

C = Consulted

I = Informed

The Principal Contractor must also provide suitable welfare facilities, site inductions, toolbox talks and regular supervision to ensure safe working practices and compliance throughout the project.

5.4. Communication and Coordination

Effective communication and coordination are essential in the Croft Street retrofit project due to the presence of residents and multiple contractors working simultaneously. Regular coordination meetings, toolbox talks and clear communication with tenants will help minimise risks, reduce disruption and ensure that all parties understand site hazards, emergency procedures and access restrictions throughout the refurbishment works.

5.5. Risk Reduction Measures

Several practical measures will be required to reduce risks during the Croft Street retrofit project. These include regular scaffolding inspections, edge protection, exclusion zones around lifting operations and effective traffic management. Fire safety measures, emergency escape routes and clear site access must also be maintained throughout construction to protect workers, residents and visitors.



Figure 5. Construction site fencing and safety signage at Croft Street retrofit project (Author's own photograph, 2026).

6. Conclusion

The Croft Street Block 2 retrofit project highlights the importance of effective health and safety management during high-rise residential refurbishment works. Due to the complexity of the project, the presence of residents during construction and activities such as recladding works, fire safety upgrades and lifting operations, compliance with health and safety legislation is essential to protect workers, tenants and the public.

The Building Safety Act 2022 and the proposed Building Safety (Wales) Bill place greater emphasis on fire safety, accountability and risk management following the Grenfell Tower fire. In addition, legislation such as HASWA, WAHR, LOLER, PUWER, COSHH and RIDDOR will influence how construction activities are managed throughout the project.

Overall, successful delivery of the project will depend on effective planning, communication, supervision and coordination between all duty holders to ensure that refurbishment works are completed safely and in compliance with current UK legislation.

Word count (excluding references, tables, figures, glossary and appendices): 1931.

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