

HSP 7

CDM Process (Construction Design and Management)



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1 Purpose

This procedure defines how Thames Water (TW) discharges its duties under the Construction (Design and Management) Regulations 2015 (CDM).

All construction works undertaken by, or on behalf of, TW are subject to CDM in some form. The process ensures:

- clear client leadership,
- competent appointment of duty holders,
- proportionate planning and risk management, and
- consistent governance from project inception to handover.

Where activities do not meet the definition of construction work, TW will apply Health and Safety at Work Act and applicable enabling regulations.

2 Scope

This procedure applies to all Thames Water construction activities where CDM Regulations apply, including situations where TW acts as:

- Client or Joint/Associated Client,
- Principal Designer,
- Designer, and
- Principal Contractor or Contractor.

It applies to both internally delivered works and works delivered through external suppliers.

3 Process

3.1 Capability Statement

TW maintains organisational capability to meet CDM requirements through:

- competent people with appropriate skills, knowledge, experience and behaviour;
- robust governance arrangements; and
- access to specialist internal and external expertise.

Competence of all duty holders is assessed before appointment and reviewed throughout the project lifecycle. Assessment considers:

- role-specific training and qualifications,
- experience in comparable risk environments,
- organisational capability and resources, and
- performance history.

Where gaps are identified, these are addressed through training, mentoring or supply-chain support. For further information, refer to [Appendix A](#).

4 Delivery

4.1 Internal Project appointment

Where TW undertakes client, design or construction activities directly, individuals must be formally assessed as competent for their role prior to appointment. Project leadership and technical roles are assessed through approved TW competency frameworks, including:

- Client and project leadership assessments,
- Principal Designer and Designer competence, and
- Principal Contractor / Contractor competence (where applicable).

Formal appointment letters confirm roles, responsibilities and authority. Identified competence gaps are supported through development or specialist advice, including engagement with the TW HSW team.

4.2 External Project appointment

External CDM duty holders are formally appointed through contractual arrangements. The appointment process follows three stages:

1. **Procurement Selection (PSQ)** – organisational competence aligned to PAS 91 and TW requirements.
2. **Framework / ITN Stage** – evidence of delivery experience and key personnel competence.
3. **Project-Specific Assessment** – review of named individuals, supported by CVs and organisational capability.

Formal appointment letters are issued for:

- Principal Designer ([HSI 16 – Principal Designer Appointment Letter Template](#)); and
- Principal Contractor ([HSI 17 – Principal Contractor Appointment Letter Template](#)).

Failure to formally appoint duty holders will result in TW assuming the relevant CDM duties.

TW allocates sufficient time and adequate resources to evaluate HS&W effectively through Subject Matter Experts (SMEs), as part of the procurement process, evaluation time and weighted criteria are given as part of that process.

The Principal Contractors shall be required to follow [HSI 22 - Engaging With Contractors and Suppliers](#), which sets out the contractual requirements for health, safety and wellbeing, including Occupational Health and CDM.

4.3 Client activities

TW manages CDM in line with the Plan–Do–Check–Act model (HSG65) and CDM Regulation 4.

Plan	• define the project brief and objectives, • assess risk and complexity, • plan competence and resources, • prepare initial Pre-Construction Information (PCI) • establish procurement and appointment strategy
Do	• appoint competent duty holders in writing, • issue and maintain PCI, • ensure welfare and Construction Phase Plan (CPP), • notify HSE where required • manage temporary works and interfaces
Check	• monitor duty holder performance and resourcing, • track H&S activities within the programme, • review PCI, CPP and H&S File development • ensure operational and maintenance risks are addressed
Act	• conduct gateway and governance reviews, • manage change through formal controls • capture lessons learned • drive continuous improvement

4.4 Project Lifecycle – CDM Stepped Approach

The following CDM requirements are embedded within TW's project processes.

Step	Requirements
0 – Project Definition	Completion of HSI30 - Initial Project Requirements Information Project name • Site address • Project description • Project requirement, objectives and asset context.
1 – Pre-Construction Information	Completion of HSI14 - Pre-Construction and Existing Site Hazard Information • Client to provide information related to the site, hazards and any existing H&S file, • identify significant residual risks, constraints and information gaps, and • designers to provide information related to the design and integrate safety and health into early stages. Completion of HSI 12 - Design Stage Risk Register Template • Create initial design risk register for Technical Governance third review (TG3) for the preferred option. Design risk must be eliminated or reduced so far as reasonably practicable, with residual risks clearly communicated.
2 – HSE Notification	Completion of HSI14 - Pre-Construction and Existing Site Hazard Information The Project Manager confirms whether works are notifiable under CDM. Where required, the F10 is prepared and submitted on behalf of the Client, with accountability held by the Programme Director for their portfolio of projects.
3 – Construction Readiness	Completion of F10 Notification Request Form (identified in HSI 34) Before works commence: • all duty holders must be formally appointed (HSI 16 - Principal Designer Appointment Letter Template and HSI17 - Principal Contractor Appointment Letter Template), • the CPP and welfare arrangements must be approved (HSI19 - Construction Phase Health and Safety Plan Checklist and HSI 20 - Welfare Facilities Checklist), • pre-start CDM and H&S meetings must be completed, and • authority to commence works must be issued (HSI 45a Authority to Commence Construction Work Letter Template). Ongoing coordination between the Principal Designer and Principal Contractor is mandatory throughout construction.
4 – Completion and Handover	Completion of HSI - 21 Health and Safety File Template All • operational information, training and handover are completed, • temporary works and site controls are removed, • assets are transferred to Operations and Maintenance, • residual risks and constraints are recorded and communicated, and • defects liability arrangements are confirmed.
5 – Transition to Operations	Information is retained for future works and management

4.5 Stepped Approach - Duties

The following departments / individuals have the following Responsibilities, Accountabilities, are Informed or Consulted at each of the Steps.

	Step 0 – Project Definition	Step 1 – Pre-Construction Information	Step 2 – HSE Notification	Step 3 – Construction Readiness	Step 4 – Completion and Handover	Step 5 – Transition to Operations
Asset Management	C	R C I	I	I	C	C
Operations	R A	R A	I	C	C	R A
Project Manager	I	R A	R	R A	A	R A
Lead Engineer	I	R	I	R	R	R
Engineering	C	R	I	C I	C I	C I
Eng Design Partners		R	I	C I	C I	C I
HS&W	I	C	R C	C	C	
Programme Director	I	I	A	I	I	I
Principal Contractor			C I	R	R	R
Principal Director			C I	R	R	R

Typical duty holders as per project scopes is as follows, for greater guidance refer to [Appendix B](#):

Construction Projects Scenarios on Operational Sites			TW Operational Responsibilities			CDM Duty Holders		
Project Type	Contracting Type	Permit Type	Controller of Premises (COP) For the Project Working Area	Controller of Premises (COP) For the Overall Operational TW Site	Coordination Lead Determined by TW COP (COP/COP Delegate or OIS) Formalised in TWOSA / TOCOP	Client	Principal Contractor Appointment Required	Principal Designer Appointment Required
Single Project Single or Multiple Segregated Areas	Single Contractor	TWOSA	TW COP	TW COP	TW Ops Role COP / COP Delegate or OIS	TW Deliverer (Ops / CMP / CD)	N/A (Single Contractor)	N/A (Single Designer)
		TOCOP	Contractor					
	Multiple Contractors	TWOSA	TW COP				Main Contractor in control of the defined site/working area	Main Designer best placed to coordinate all design activities
		TOCOP	Principal Contractor					
Multiple Projects Where Works Cannot be Segregated	Single Contractor	TWOSA	TW COP	TW COP	TW Ops Role COP / COP Delegate or OIS	TW Deliverer (Ops / CMP / CD)	N/A (Single Contractor)	N/A (Single Designer)
		TOCOP	Contractor					
	Multiple Contractors	TWOSA	TW COP				Main Contractor in control of the defined site/working area	Main Designer best placed to coordinate all design activities
		TOCOP	Principal Contractor					
Multiple Projects Multiple Segregated Areas	Single Contractors in each Area	TWOSA	TW COP	TW COP	TW Ops Role COP / COP Delegate or OIS	TW Deliverer (Ops / CMP / CD)	N/A (Single Contractor)	N/A (Single Designer)
		TOCOP	Contractor					

• Wherever there is more than 1 contractor (including sub-contractors) operating within a defined site/working area regardless of project type or permit type, a Principal Contractor and Principal Designer must be appointed to lead on coordination of activities and ensure work is carried out safely and without risk to health and all designers comply with their CDM duties.
 • All contractors and designers have a duty and responsibility to collaborate with other contractors and designers and follow directions from the Principal Designer and Principal Contractor
 • The Client must take reasonable steps to ensure appointed duty holders fulfil their responsibilities.
 • Where none of the above scenarios are not deemed appropriate for safety reasons/CDM compliance then the CoP must escalate to the Director of H&S

4.6 Assurance and Monitoring

The TW Health, Safety and Wellbeing team provides independent assurance across projects, including:

- CPP and CDM compliance reviews;
- site inspections focusing on welfare and controls; and
- verification of duty holder compliance.
- findings are recorded, reported and tracked to closure.

5 References

CDM Toolkit Documents

HSI 12 - Design Stage Risk Register Template

HSI 13 - Client Duties Confirmation Letter Template

HSI 14 - Pre-Construction and Existing Site Hazard Information

HSI 16 - Principal Designer Appointment Letter Template

HSI 17 - Principal Contractor Appointment Letter Template

HSI 19 - Construction Phase Health and Safety Plan Checklist

HSI 20 - Welfare Facilities Checklist

HSI 21 - Health and Safety File Template

HSI 30 - Initial Project Requirements Information

HSI 31- Principal Designer and Designer competencies

HSI 31a - Project Leadership (Client) Competency

HSI 31b - Principal Contractor and Contractor Competency

HSI 34 - F10 Notification and Revision Requests

HSI 45 - CDM Client Checklist

HSI 45a - Authority to Commence Construction Work Letter Template

SHE 17 - New/Refurbished Asset Inspections Form

SHE 19a - Contractor Risk Assessment and Method Statement Review

SHE 19b - Contractor Risk Assessment and Method Statement Review Guidance

Appendix A – Thames Water Capability Statement

Purpose

Thames Water (TW) is committed to complying with the Construction (Design and Management) Regulations 2015 (CDM) to ensure health, safety, and welfare in all construction-related activities.

This statement sets out our organisational capability and arrangements for fulfilling CDM duties.

Organisational Capability

- **Competent People:** We ensure that all individuals appointed as duty holders (Client, Principal Designer, Principal Contractor, Designers, Contractors) have the necessary skills, knowledge, experience, and behaviours to discharge their responsibilities under CDM2015.
- **Competent Organisational Appointments:** Where applicable, TW will employ competent organisations to address any gaps in TW capability that demonstrate CDM skills, knowledge, experience, capability and behaviour.
- **Resources:** Adequate time and financial resources are allocated to plan, manage, and monitor H&S throughout the project lifecycle.

Roles and Responsibilities

Client Role	As the client, Thames Water will, so far as is reasonably practicable, fulfil the duties under Part 2 of L153 CDM2015: • Provide a clear Client/Project Brief outlining H&S technical expectations. ○ Evaluate the risk, complexity and knowledge gaps within TW ○ Appoint Technical Resources applicable. • Prepare and share Pre-Construction Information with all duty holders. • Support the mitigation of any information gaps identified. • Appoint a competent Principal Designer and Principal Contractor in writing where more than one contractor is involved. • Communicate the H&S File format and digital requirements for asset management. • Ensure welfare facilities are provided and maintained. • Notify the HSE via the F10 online process.
Principal Designer	Principal Designer are designer appointed by the Client: • Plan, manage, monitor and coordinate H&S in the pre-construction phase of a project. • This includes: ○ identifying, eliminating or controlling foreseeable risks; ensuring designers carry out their duties. ○ Prepare and provide relevant information to other duty holders. ○ Provide relevant information to the principal contractor to help them plan, manage, monitor and coordinate H&S in the construction phase.

Designer	Designer role prepares and modifies designs: • When preparing or modifying designs, to eliminate, reduce or control foreseeable risks that may arise during construction and the maintenance and use of a building/ asset once it is built. • Provide information to other members of the project team to help them fulfil their duties.
Principal Contractor and Contractor role	• Principal Contractor: overall construction phase control; CPP; welfare; site security; coordination; worker engagement; performance monitoring. • Contractors: deliver scope per CPP and RAMS; competence; supervision; cooperate; report hazards; maintain controls.

External Appointment

In addition to the above requirements will be contractual alignment confirming the CDM duties.

Governance and Assurance

Policies and Procedures: Our CDM compliance is embedded in Thames Water's H&S Management System and supported by:

- CDM High-Level Process Flow
- Client Checklist
- Duty Holder Role Descriptions
- Contract verification where applicable

Monitoring and Review: Regular audits and reviews ensure compliance with CDM 2015 and facilitate continuous improvement.

Communication and Collaboration

We maintain effective communication between all parties, ensuring that H&S information is shared promptly and accurately.

TW have a common data environment that coordinates all information.

We engage with workers, stakeholders and industry to consult on risk management strategies.

Commitment

Thames Water is committed to delivering projects safely, sustainably, and in compliance with the Construction (Design and Management) 2015 Regulations (CDM2015), protecting our workforce, customers, and the public.

Appendix B – Application of CDM Regulations for notifiable projects.

Description	CDM Applies	Ops procedures apply	Client	Principal Designer	Principal Contractor	PCI	CPP	RAMS MHSWR99 etc	HSF
Routine maintenance of plant and equipment in line with manufacturer's instructions (replacement parts and components). With no construction work or temporary works required.	No	Yes	N/A	N/A	In-house competence	Yes	N/A	Yes + Permits	Yes
Repairing or replacing defective equipment and components, which may involve the use of scaffolding, mobile elevated work platforms or cranes to facilitate access/egress to the work. No design input is required – i.e. like-for-like replacement of components. Tasks which are simple and are repetitive in nature. Require a minimal degree of planning, lesser degree of thought, input and involvement of different parties, minimal organisation, allocation of time and resources. With no construction work.	Yes	Yes	N/A	N/A	In-house competence	Yes	N/A	Yes + Permits	Yes
Repairing or replace defective equipment and components, which may involve the use of scaffolding, mobile elevated work platforms or cranes to facilitate access/egress to the work. In some cases, bespoke engineered access solutions may be required. Design work is required	Yes	Maybe if reviewed as suitable	Yes	In-house competence Or external	In-house competence Or external	Yes	Yes	Yes + Permits	Yes
Cleaning tanks or pipelines with high-pressure water (jet washing) but which require <u>no</u> enabling construction works such as excavations. Using standard drain/sewer/suction vehicles that operate between 0 – 275 bar (4000psi). May involve 'vactor' and /or tanker services to remove existing materials.	No	Yes	N/A	N/A	In-house competence	Yes	N/A	Yes + Permits	Yes
Cleaning tanks or pipelines with high-pressure water (jet washing) but which require enabling construction works such as excavations	Yes	Maybe if reviewed as suitable	Yes	In-house competence Or external	In-house competence Or external	Yes	Yes	Yes + Permits	Yes

Description	CDM Applies	Ops procedures apply	Client	Principal Designer	Principal Contractor	PCI	CPP	RAMS MHSWR99 etc	HSF
Cleaning tanks or pipelines with high-pressure water, hydro-demolition (ultra-high pressure)	Yes	Maybe if reviewed as suitable	Yes	In-house competence Or external	In-house competence Or external	Yes	Yes	Yes + Permits	Yes
Management of external contractors to undertake repair or modification works requiring design input, i.e. not like-for-like replacements, i.e. low to medium complexity construction projects. Clarification needed: Has Operations set up the following team - In-house team represents the Client organisation and is not classed as a 'contractor', unless the in-house team is specifically established to undertake construction 'projects', not just routine maintenance activities. This is true for CMP and MP&P, if Operations are completing this as a 'contractor' and not assessed we are in breach of the CDM Reg	Yes	N/A	In-house	External	External	Yes	Yes	Yes + Permits	Yes
Coordination of construction/non-routine maintenance projects with in-house project management teams and external contractors, i.e. • High risk / high complexity projects – H&S, environmental or operational risk • Specialist design required (e.g. temporary works, dam walls) • High level of information gathering or investigation required to ensure safe design and integrity of design	Yes	N/A	In-house SPV	External	External	Yes	Yes	Yes + Permits	Yes
Emergency works – emergency and reactive works phase (Completed when the situation is made safe and brought under control – assets may still be out of commission)	Yes		Yes	Client	Client	Yes	No	Yes	Yes
Emergency works – planned and improvement phase	Yes		In-house	External	External	Yes	Yes	Yes + Permits	Yes

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