

Section 7

Managing Contractors



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Section Introduction

This section provides instruction and guidance on how to manage contractor activities.

Contractors include all providers of services; for example, office services, cleaning, repairs and maintenance. The term also refers to construction contractors. Thames Water engages a wide range of contractors, from small local companies, to major multi-national construction contractors. For the purposes of this section, the term 'contractor' includes designers and external parties who deliver work on our behalf.

All sites and office locations, at one time or another, will have contractors working on them, so we need to ensure they work safely. There must always be a member of the team who is accountable and responsible for managing the contractor's activities. Site managers or members of the team who engage/manage contractors, must attend the Thames Water 'Permit to Work Engaging with Contractors' training course.



Why we must manage contractors:

- To ensure contractor activities do not have a detrimental effect on the **safety of our staff or anyone else**; for example, members of the public;
- To ensure we **keep control of our premises** and maintain a safe working environment; and
- To protect our business and reputation.

To manage contractors:

- Ensure they are **capable** and **competent** to do the work.
- **Inform** them about existing site hazards and risks.
- **Monitor** their work. These inspections require a skilled and competent person to carry out basic checks from time to time.

The five steps to manage contractors effectively for health and safety are:



Step 1 - Explains how to select contractors, depending on the risks related to the work and the type of work.

Step 2 – Details the planning and design of the work and outlines your responsibility to provide site-specific information to contractors.

Step 3 – Provides guidance on pre-start communications, instructions and liaison with contractors.

Step 4 – Outlines our legal duty to monitor contractor activities and provides practical advice on the procedure.

Step 5 – Details factors to consider once works are complete, to ensure lessons learned can be recalled if necessary.

Heads of departments must ensure their internal procedures meet these requirements and support health, safety and wellbeing procedures.



Note: This section is supported by other documents which provide additional information on site hazards and contractor requirements. See, for example '[Engaging with contractors and suppliers](#)' and '[Essential Standards](#)', available from the [Health, Safety and Wellbeing](#) section of the SharePoint Portal.



Step 1 – Scope of Work and Selecting a Contractor

Staff who engage with contractors must be able to:

- Identify complex activities;
- Confirm the scope and nature of the work: construction or non-construction, level of risk, and skills required; and
- Select a competent contractor.

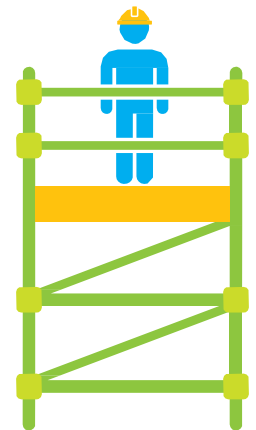


Select the right type of contractor for the type of work. All contractors that conduct work on our sites in a physical capacity, working on our behalf or providing consultancy that requires elements of design to our assets require an Achilles assessment. The results are recorded on SAP, and the status of the assessment must be confirmed with Vendor Status via: vendor.status@thameswater.co.uk. A list of health & safety assessed suppliers can also be found at [Contractor Assessment Achilles](#).

Identifying complex activities

If you engage a contractor to carry out complex activities, ensure the work is managed correctly. Examples of works can include:

- Construction work
- Minor Civils
- Tunnelling and headings (over 5 metres in length)
- Work at Height
- Activities that involve the use of technology or equipment that is new to Thames Water
- Confined space activities where the following is involved:
 - Requirement for a Class C permit
 - Working in chemical suits, full breathing apparatus, or using airlines
 - Working in strong flows that increase the possibility of drowning
 - Working in a live sewer within a 3-mile radius of a strategic pumping station
- Installation/maintenance of high-voltage electrical equipment/services
- Demolition/dismantling of significant structures
- Diving operations
- Activities that deviate from standard agreed procedures
- Projects where an incident could result in negative publicity and damage to the Company's reputation



Where a project exceeds 30 construction days, with 20 or more workers on site at any one time, or if the project exceeds 500 person days, the HSE must be notified as required by the Health and Safety (Construction Design and Management) Regulations 2015. Further information on construction work can be found in the [CDM Toolkit](#) and '[Construction Design and Management Regulations 2015](#)' (HSP 7), available from the Health, Safety and Wellbeing section of the SharePoint Portal.

Confirm the scope of work

Before you select a contractor, determine the scope of the works to be carried out, as well as the following:

- Whether the work is defined as construction work; and
- The specialist knowledge and skills required to do the work.
- As part of the [CDM Toolkit](#) a template [HSI30 Client-Project brief](#) is available to set out general requirements of the project



Selecting a competent contractor

Having confirmed the project scope and related risk, appoint a competent contractor to carry out the work. Ensure the contractor you select has completed a current Achilles assessment, and meets our pass mark (80% or higher for both site and systems).



If your preferred contractor has not completed an Achilles assessment, because the activity is of a specialist nature and cannot be completed by an existing contractor, please let us know via: safetyhealthandwellbeing@thameswater.co.uk. A member of the Health, Safety and Wellbeing Team will provide advice and support in getting your preferred contractor assessed by our Achilles-appointed third party.

Also ensure the contractor has the available resources, including sufficient time, experience, personnel, materials and finance, as this will affect whether the contractor is able to do and complete the work safely.

Further information on the health and safety assessment can be found in [HSP37. Supplier Health and Safety Assessment Achilles UVDB Verify](#) available from the Health Safety and Wellbeing section of the SharePoint Portal.



Step 2 – Initial Planning

This step provides instruction and guidance to people engaging contractors and site managers on how to:

- Determine if works include design;
- Gather and provide necessary information to contractors;
- Review contractor documentation and issue permits and authorisations; and
- Manage the construction work through regular reviews of progress and monitoring.



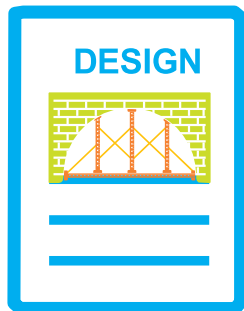
Investing time and effort in planning the work can benefit the health, safety, and wellbeing of the business. Engaging a contractor early-on in this process will encourage information sharing which, in turn, can improve design, avoid costly changes, improve on-going maintenance and reduce delays.

As a manager, you have a duty towards contractors who are either working on your site or have been engaged by you or members of the team. Effective communication, cooperation and coordination are all key to ensuring work is carried out effectively and without risks to the health and safety of all those involved or affected by the work.



Determine if you are designing

The 'Construction Design and Management Regulations 2015' (CDM 2015) applies to all building and construction work. It includes new build, demolition, refurbishment, extensions, conversions, repairs and maintenance. It defines a client as 'organisations or individuals for whom a construction project is carried out' and is applicable to both domestic and commercial clients.



You are carrying out a 'design' if you:

- Prepare or alter designs;
- Specify or prohibit the use of particular material, articles or methods of work;
- Purchase a material (where there are still some choices to be made); or
- Insist on a certain building layout.

If the above applies to you, then you can have a fundamental effect on both the health and safety of the work being carried out and of future operation and maintenance activities.

Take one of the following actions:

- If you, or a member of your team, makes simple design decisions e.g. decide you need a ladder in a shaft, or instruct a contractor to use a certain type of coupling, you must review the change to ensure all related health, safety and wellbeing risks have been considered as part of the design. Once agreed, communicate this to everyone involved in the work.
- Use **the principles of prevention** to control hazards and risks identified during the design process. To record the actions you have taken, and to identify any remaining hazards/risks, you must complete the '[Design stage risk register template](#)' (HSI 12), available from the [CDM Toolkit](#). Once completed, hand over the register to the relevant people; for example, contractors.
- If you are carrying out design activities for an external client (this mainly applies to Developer Services), and you have a reason to suspect the client is unaware of their duties, then you must write to the client informing them of these duties using [Client duties confirmation letter template](#) (HSI 13).

Gather and provide information on existing site hazards

All contractors must be provided with the relevant site and Hazard information. HSI 14 is to be used to identify the existing hazards on site and shall be prepared by the Controller of Premises in conjunction with the Principal Designer /Designer at the very early stages of design.

This will assist in the development of a risk register relevant to the Works, which shall be reviewed pre-construction. All parties concerned must ask the question "Can this be done more safely?"

Also consider the following:

- Structural information: for example, fragile roofs, previous modifications that may affect stability, fall-arrest anchor points, or damaged areas of the structure (e.g. by fire);
- Access arrangements: for example, narrow streets, access times, height limits (from overhead services) or security;
- Restricted areas and their access requirements: for example, due to hazardous material storage, services, weak bridges, underground structures or height restrictions;
- Location of existing services: for example, overhead, underground, electric, gas, data or process;
- Hazardous materials: for example, asbestos or contaminated land;
- Health risks from our activities;
- Emergency arrangements: for example, fire or chemical release;
- Welfare arrangements: if there are any facilities available for the contractor to use; and
- Relevant information from the site's health and safety file.



Provide the contractor with the above pre-construction information in a timely manner, so they can plan and manage the work effectively.



Reviewing risk assessments and safe systems of work

Before the contractor starts work, you must review their **risk assessments** and any **safe systems of work (only required for high-risk or complex work)** relating to the task. This allows you to plan for any additional control measures. The review must consider how the work will affect safety on site, including the impact on:

- Thames Water personnel;
- Other contractors, visitors and member of public; and
- Operational processes.

Form [SHE19a](#) can be used for the review. Form [SHE19b](#) contains guidance on completing the review.

For **planned work**, the contractor must submit risk assessments and safe systems of work to you at least 10 working days before the work starts. They may not start work within that period, unless you have no objections. If you reduce the required timeframe, you must ensure there is still sufficient time and resources available to carry out a thorough and proper review. You must also ensure you have given the contractor sufficient time to plan and mobilise the necessary equipment to allow the work to be carried out safely; for example, planning for welfare facilities and staff.

Written risk assessments are always required for the work **if there is a significant hazard** that has the potential to cause real harm. Properly prepared risk assessments are normally sufficient to manage risks. However, sometimes they must be supplemented by a safe system of work if the task is particularly complex, or if the sequence of events is important in maintaining safety throughout the work.

Risk assessments

The following information must be contained in a risk assessment:

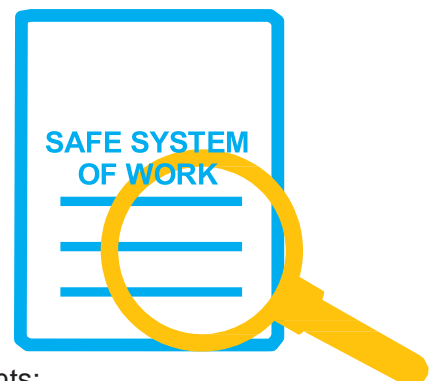
- Significant hazards associated with equipment, plant, processes and the physical environment;
- The persons likely to be at risk from the activity;
- Existing control measures and additional controls required to avoid or further reduce the risk; and
- Provision for reviewing the assessment.



Safe systems of work (if required by complex operations)

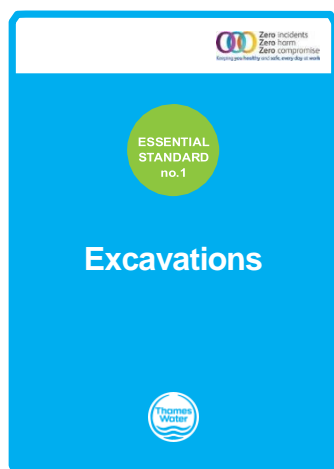
The following information must be contained in a safe system of work:

- Brief description of the work;
- Logical sequence of the main job's tasks (identifying the method and associated safety controls);
- Key activity and task-specific risk assessments;
- Permits to work and required authorisations;
- Specific health and safety equipment required;
- Environmental and physical factors affecting safety;
- Personal protective equipment required;
- Emergency contact details, site management and contingency arrangements;
- Details of those involved and training received;
- Confirmation that relevant information and instruction have been recorded and communicated to the team;
- Names of those responsible for implementing and monitoring the safe system of work; and
- Provision to review the safe system of work if circumstances change.



These documents are unlikely to be in the same format as the Thames Water documents, but the contents should be similar. If risk assessments and any safe systems of work do not meet these minimum requirements, advise the contractor to provide further information. Inform them that, until you are satisfied the work can be done safely, the work cannot start.

Essential Standards



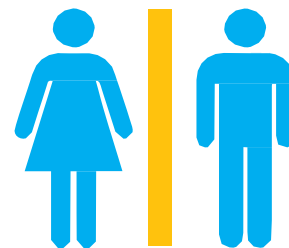
You are not expected to have sufficient and detailed knowledge of highly specialised contractor activities; for example, knowledge on the adequacy of methods for carrying out tunnelling or diving activities. However, many contractor activities are common; for example, roof-work, excavations and use of mobile plant. To this effect, we have developed a suite of Essential Standards (see Step 4) which will assist you in determining what is acceptable health and safety practice. These can be used when reviewing risk assessments and carrying out inspections.

The Essential Standards cover common health and safety matters, and have been developed by using simple, yet effective illustrations to raise health and safety awareness. They can assist you in ensuring your contractors are following acceptable health and safety practices in a specific topic/activity.

[Essential Standards](#) are available from the Health, Safety and Wellbeing SharePoint Portal, and the Health and Safety Hub via: www.healthandsafetyhub.co.uk

Welfare

Ensure the contractors' arrangements for providing welfare facilities are suitable for the size and nature of the work being carried out. Thames Water does not need to provide welfare facilities to contractors, but we do need to cooperate and assist if there are issues; for example, space constraints. Find more information on welfare requirements in ['Welfare facilities checklist' \(HSI 20\)](#), available from the Health, Safety and Wellbeing section of the SharePoint Portal.



Review existing documentation ('Work safety survey checklist' – SHE 1)

Assess the impact of the contractor's presence on the existing site's health and safety. Also consider other processes which may be affected by the work the contractor is doing; for example, traffic management. You will already have a completed [SHE 1](#), which must be updated with any changes that may affect Thames Water or others on your site. It is good practice to review this with the contractor at a pre-start meeting.



Review training

Ensure all Thames Water and contractor staff visiting or working on operational sites hold a valid Thames Water safety passport, which reflects their role. Further information is available via: TWpassport@thameswater.co.uk.

Managing CDM compliance (all projects)

Ensure you understand the role Thames Water plays as the client in the delivery of a construction project, as your responsibilities and required activities will depend on this.

The health and safety procedure ['Construction Design and Management Regulations 2015' \(HSP 7\)](#) outlines this process from the perspective of Thames Water as the client. This document is available from the Health, Safety and Wellbeing section of the SharePoint Portal.



Step 3 – Before and on Arrival on Site

This step provides instruction and guidance on how to:

- Establish clear communication with the contractor;
- Issue TOCOP, TWOSA and Permit to Work (see below); and
- Provide the contractor with essential safety information regarding your site.



Communication (before the contractor begins work)

Establish direct communication with the people managing the contractor activities on site. This may be in the form of a phone call or a series of meetings, depending on the complexity and scope of the work. This helps to ensure roles and responsibilities are clear which, in turn, supports effective management. Agree on the monitoring and supervision the contractor must provide during the work.



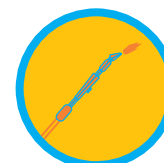
Reviewing risk assessments and safe systems of work

If you haven't already done so, review the contractors' risk assessments and safe systems of work, before issuing any TOCOP, TWOSA and Permit to Work. For guidance, please refer to Step 2.

Issuing TOCOP, TWOSA & Permit To Work

Contractors can only begin work once you have issued a TOCOP or TWOSA. You must be an authorised person identified in the Team Skills Register to issue TOCOP or TWOSA.

- **Thames Water Operational Safety Authorisation (TWOSA):** an electronic record of the formal exchange of essential health and safety information between you and the contractor. It gives contractors permission to carry out work on your asset. It is not a substitute for a Permit to Work (see below), which may need to be issued for high-risk or complex activities. A TWOSA is issued to a contractor in circumstances where Thames Water retains control of the workplace, and where contractors work alongside our own employees.
- **Transfer of Control of Premises (TOCOP):** a form issued to confirm that a site or discrete area has been passed over to a contractor. This form is not a permit to work, nor does it in any way prescribe safety controls. It confirms that the site/area is now the responsibility of the main or principal contractor. A site manager and the contractor must sign the form to confirm both the transfer and completion of work to return control of the premises. Requests for a TOCOP must be accompanied by a site plan, indicating the area to be transferred. During work, display a copy of a completed TOCOP at the site, along with signs indicating that the area is subject to a TOCOP.
- **Permit to Work:** issued in situations where the contractor must carry out work on the network, or on items of plant or equipment that are high-risk or require isolation from sources of danger to ensure the safety of those involved. Examples of Permit to Work include:
 - C-permit for a confined space
 - Electrical Permits for high and low voltage
 - Hot work permit
 - G-permit for general mechanical plant



For further information on TOCOP, TWOSA and Permit to Work, refer to the health and safety procedure '[Permits and authorisations](#)' (HSP 6), available from the Health, Safety and Wellbeing section of the SharePoint Portal.

Essential health and safety information

Provide contractors, visitors and delivery drivers with relevant and essential health and safety information on their arrival.

This can take two forms:

- Contractors can use the information previously supplied during Step 2 to brief their own staff and any other relevant staff. The person engaging the contractor (if different from the site manager) is responsible for ensuring the contractor has received this information; or
- Undertake the briefings yourself.



The minimum topics that must be covered during the briefing include:

- Site rules and restrictions;
- Health information and bio-hazards;
- Traffic management arrangements;
- Emergency arrangements;
- Temporary works and other ongoing activities;
- Site-specific hazards and existing risk controls; and
- Ongoing communication arrangements.

Contractor staff changes

Contractors' staff can change regularly, and every now and then you must check whether the contractors are briefing all new starters on site. If you are providing the briefing yourself, ensure all new contractor's staff receive the necessary information upon arrival, and keep a record of the briefing.



Step 4 – Working on Site and Monitoring

This step provides instruction and guidance on:

- Active monitoring, using SHE 6 checklists;
- Active monitoring, using 'common standards'; and
- Reactive monitoring.



Monitoring the performance of contractors working on your site(s) is important for ensuring ongoing competence and adherence to safe systems of work, risk assessments and safety standards.

Monitoring performance is split into two categories:

- **Active monitoring:** inspections and checks, done with the aim of preventing incidents; and
- **Reactive monitoring:** the process of reporting incidents and investigating them



Active monitoring (SHE 6)

It is critical to actively monitor the behaviour and standards of contractors on your site, so plan this as a regular activity. The breadth of subjects covered, and the frequency of monitoring, depend on the complexity and risk of the work being done. Site managers, and any members of the team who engage contractors, are required to complete at least one SHE 6 per month on contractor activities.

Discuss comments on both positive and negative aspects of site activities with the contractors' on-site representative and agree on actions to follow. In situations where there is potential danger, take appropriate action to prevent harm.



Monitoring construction activities



Site managers, or members of the team responsible for managing the contractor, must regularly monitor construction activities using:

- **SHE 6 (H)**: a construction management inspection that must be completed within the first month on site to check the management system; afterwards, check every quarter; and
- **SHE 6 (I)**: a construction site's standards inspection that must be completed monthly to check the contractor's activities.

Determine if a project must be notifiable to the HSE. For example, the HSE must be notified if you notice during active monitoring of a small construction project that it is increasing in scope and might result in more than 30 on-site construction days.

Essential Standards

The Essential Standards provide topic-specific instruction and guidance and can help you complete effective inspections of contractor activities. Refer to Step 2 for more details.

Reactive monitoring

Contractors use SpheraCloud to report and investigate incidents. Remind them to report the following on SpheraCloud:

- All lost-time injuries;
- All non lost-time injuries;
- Safety observations;
- Near misses
- Service strikes; and
- Dangerous occurrences (as defined in RIDDOR).





Step 5 – Completion and Feedback

This step provides instruction and guidance on how to:

- Undertake inspections of new or refurbished assets;
- Close TOCOP, TWOSA and Permit to Work;
- Ensure you have received the necessary technical information; and
- Review a contractor's performance.



This part of the project can introduce new risks, as the handover of assets is often staggered, resulting in contractors and Thames Water staff working alongside each other. All affected parties must discuss and agree on how health and safety risks will be managed during this stage.

New/refurbished asset inspections (SHE 17)

Thames Water Operations Managers / Controllers of Premises and the contractor must carry out joint inspections following the installation of new plant/equipment, or significant changes to existing plant/equipment. The inspection must determine whether the installation can be operated and maintained safely, and without risk to health. Ensure this is carried out before the contractor leaves the site and authorisations are cancelled, so problems can be solved more easily.

The people involved in the inspection depend on the complexity of the work: it can vary from a local inspection of the work site, to involving a technical expert. If required, a member from the local Health, Safety and Wellbeing Team can provide support when completing a larger and more formal inspection.

Complete a [‘New/refurbished asset inspection form’ \(SHE 17\)](#) before accepting the asset for service.



Closing TWOSA, TOCOP and Permit to Work

Before closing TOCOP, TWOSA and Permit to Work and accepting plant/equipment, ensure the contractor has:

- Left the site in a safe condition;
- Removed all equipment and rubbish;
- Supplied all relevant documentation;
- Provided or arranged for training for new/replacement plant and equipment; and
- Completed any actions arising from the SHE 17 inspection form.



The contractor must first return and close all Permits to Work, before returning and closing TWOSA or TOCOP.

In the case of a TOCOP, sign the transfer with the contractor to indicate you have taken back control of the premises. Also remove signs and fences and communicate the change to your personnel. Ensure the contractor submits the TWOSA for review and closure and, where applicable, uploads before and after photographs where applicable.

Transfer of technical information

The person managing the contractor must obtain all relevant technical documentation from the contractor and pass this on to you, along with any keys required to operate or maintain the plant.

If contractors are carrying out work on your site/asset that results in significant alterations to existing assets or the provision of new assets, obtain a new Health and Safety File, or update the existing one.

Keep the Health and Safety File up-to-date, and hand it over to those who must do future work on the asset.



Review of the 'Work safety survey checklist' (SHE 1)

Review the *SHE 1* checklist if there are any changes to a site's conditions. Also arrange specific training for Thames Water staff who operate any new equipment/plant.

Review of performance

Once a project is complete, it is good practice to review and provide feedback via SAP to Supply Chain on the health and safety performance of the contractor. This feedback forms a vital part of assessing the ongoing health and safety competence of our contractors, and we value your thoughts and opinions in this respect.

The Health, Safety and Wellbeing Team also encourages feedback to improve our standards. We want to learn from your experiences, so forward your comments to: safetyhealthandwellbeing@thameswater.co.uk

