



Management of Contractors Policy

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1. Purpose

Thornbury Town Council has a legal duty of care under the Health and Safety at Work etc. Act 1974 to protect its employees, contractors, and others who may be at risk whilst working within Council properties or as a result of its activities.

This policy outlines the principles and procedures for managing contractors to ensure their work is carried out safely and does not pose risks to themselves, Council employees, building occupants, or the wider community.

It applies to all works undertaken by contractors and subcontractors, with compliance with other legislative or Council-specific requirements addressed in relevant policies and guidelines.

Legal Framework

This policy is underpinned by the following legislation:

- [The Health and Safety at Work Act etc. 1974](#)
- [The Management of Health and Safety at Work Regulations 1999](#) and [amendments 2006](#)
- [The Construction \(Design and Management\) Regulations 2015 \(CDM\)](#)
- [The Control of Asbestos at Work Regulations 2012](#)

2. Policy Statement

Thornbury Town Council is committed to managing, as far as is reasonably practicable, works undertaken on its behalf by contractors or their subcontractors are carried out safely and without risk to themselves, Council staff, the community, or the environment. And are compliant with all relevant health and safety legislation, standards, and Council policies.

The Council aims to achieve this commitment through the following measures:

Safety and Compliance Measures

Conducting thorough checks of all contractors prior to awarding contracts (or establishing framework agreements) to ensure, as far as is reasonably practicable, that only suitably competent people are engaged to undertake works on behalf of the Council.

Ensuring contractors do not commence work until they have submitted, and where required implemented, suitable and sufficient risk assessments to effectively manage any significant risks associated with their activities. Establishing robust procedures to ensure contractors provide all required information, documentation, and certifications, enabling the Council to meet both its general and specific health and safety obligations. For notifiable projects, construction works will only proceed once the Principal Contractor has prepared an appropriate Construction Phase Plan and put in place adequate welfare arrangements in accordance with legal requirements.

Supplying contractors with the necessary information, instruction, and supervision to carry out their work in compliance with this policy, all relevant health and safety requirements, and any applicable legislation. This includes sharing asbestos datasheet information about known asbestos locations to enable contractors to plan and execute their works without risk of exposure to, or the uncontrolled release of, asbestos fibres.

Legal and Operational Readiness

Requiring prior written approval from the Chief Executive (or their appointed representative) for any contractor works involving the building fabric, services, or infrastructure. No such works will commence without this approval. This includes installations, such as data cabling, that necessitate work on the building fabric or services.

As required by law, promptly notifying the Health and Safety Executive (HSE) of all relevant construction projects undertaken by the Council.

Establishing and enforcing “Permit to Work” systems for the management of specified high-risk activities. Sufficient resources will be allocated to ensure that Permits to Work are issued only by suitably competent and authorised individuals.

Monitoring and Continuous Improvement

Monitoring all contractor works under the direct control of the Council. This monitoring will be undertaken by a suitably competent person (or persons) appointed by the Council.

Developing and implementing suitable and sufficient risk-based procedures to ensure effective control, coordination, cooperation, and communication for all contractor works.

Ensuring that all construction works and projects are planned with adequate time and resources to allow for safe delivery.

Performance Evaluation and Improvement

Monitoring contractor performance at appropriate intervals and taking corrective action where health and safety concerns are identified.

Reviewing overall contractor performance upon contract completion and implementing, where practicable, significant findings to improve future practices.

Environmental

Thornbury Town Council are committed to minimising the environmental impact of its operations and ensuring that all contractors working on its behalf adhere to sustainable practices. The Council expect contractors to comply with all relevant environmental legislation, regulations, and standards, and to actively seek opportunities to reduce waste, conserve energy, and minimise carbon emissions. Contractors are encouraged to use environmentally friendly materials, adopt

efficient resource management practices, and promote recycling and reuse wherever possible. Together with contractors the Council aim to contribute to a greener, more sustainable future.

By adhering to these measures, Thornbury Town Council seeks to ensure that contractor works are carried out safely, responsibly, and in full compliance with legislative, policy and environmental requirements.

3. Definitions

Contractor:

An individual, company, or organisation engaged by the Council to provide services for gain or reward.

Competent Person:

Someone with the appropriate skills, qualifications, and experience to perform tasks safely and effectively. Competence for large projects may be ensured by a team with clear accountability.

Construction Work:

Construction work is legally defined within the Construction Design and Management (CDM) Regulations as “the carrying out of any building, civil engineering or engineering construction work” and includes:

- (a) the construction, alteration, conversion, fitting out, commissioning, renovation, repair, upkeep, redecoration or other maintenance (including cleaning which involves the use of water or an abrasive at high pressure, or the use of corrosive or toxic substances), de-commissioning, demolition or dismantling of a structure
- (b) the preparation for an intended structure, including site clearance, exploration, investigation (but not site survey) and excavation (but not pre-construction archaeological investigations), and the clearance or preparation of the site or structure for use or occupation at its conclusion
- (c) the assembly on site of prefabricated elements to form a structure or the disassembly on site of the prefabricated elements which, immediately before such disassembly, formed a structure
- (d) the removal of a structure, or of any product or waste resulting from demolition or dismantling of a structure, or from disassembly of prefabricated elements which immediately before such disassembly formed such a structure
- (e) the installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services which are normally fixed within or to a structure

Notifiable Projects:

CDM requires that certain projects be notified to the Health and Safety Executive. These include projects that will last more than 30 days where there will be 20 or more workers

on site at any time during the project and any projects involving more than 500 person working days.

Principal Contractor:

A principal contractor is a specific duty holder required, under CDM, to be appointed on all notifiable projects. They plan, manage and monitor the construction phase so that it can be performed safely. The Council will never act as the Principal Contractor on such projects. Whilst the Council has some duties with regards to how notifiable projects are planned and delivered, these do not extend to approving method statements and risk assessments or directly supervising works unless these are carried out outside of areas specifically handed over to the Principal Contractor. In these instances, the Council must check and approve RAMS before any work are carried out. The Council will also be responsible for monitoring how the work is undertaken to satisfy themselves that appropriate safety procedures are being followed.

Sub-Contractor:

An individual or organisation employed by a contractor to undertake specific tasks.

Voluntary workers:

Voluntary workers are considered employees for health and safety purposes.

4. Responsibilities

The Chief Executive

The Chief Executive has the overall day to day responsibility for health and safety matters at Thornbury Town Council. The Chief Executive delegates responsibility for undertaking aspects of these duties through line management and identified roles. The following people are identified as having responsibility for management of contractor safety issues in those areas, and for those relevant persons, that fall under their control:

4.1 Deputy Clerk and Facilities Officer – Contractor Management Responsibility

The Deputy Clerk and Facilities Officer share responsibility for ensuring contractors comply with Council policies and standards. Their responsibilities are defined as follows:

4.1.1 General Responsibilities for All Contractors

The Deputy Clerk oversees contractors working in parks and open spaces, while the Facilities Officer manages contractors working on Council buildings and services. Both must ensure that contractors:

- Provide all required information before work begins, including written risk assessments and/or method statements for activities posing significant risks to people, Council property, or the environment. Work will not commence until these documents are reviewed and approved.
- Demonstrate the necessary competence to perform tasks safely and deliver work to the required quality and safety standards.

- Are provided with suitable and sufficient information, including details of hazards or significant risks present in their work areas.
- Receive appropriate inductions for their work, with a record of induction maintained. Inductions related to building fabric or services will be handled by the Facilities Officer; all other inductions will be handled by the Deputy Clerk or relevant commissioning officer.
- Are monitored at suitable intervals based on the risks associated with their work.
- Comply with the Council's contractor management policies and procedures.

If contractors are to work in areas controlled by others, the responsible officer must ensure:

- Local staff and stakeholders are informed in advance of what work will be carried out, where, and when.
- Work is coordinated with local staff to minimise risks to contractors, council staff, and the public.

4.1.2 Construction and Infrastructure Works

For works involving construction or changes to infrastructure, building fabric, or services:

- The responsible officer must ensure proposed works are communicated to the Chief Executive or their representative (Deputy Clerk for the Facilities Officer and vice versa) as early as possible, and no work begins without written approval.
- Contractors must:
 - Be allocated sufficient time to safely complete the work.
 - Be provided with relevant site information, including details on hazards (e.g., asbestos, contaminated waste etc).
 - Be identifiable to staff and the public while on site.
- All works must be properly planned and coordinated to ensure risks are reduced to acceptable levels.

4.1.3 Notifiable Projects (CDM Regulations)

For notifiable projects under the CDM Regulations, the responsible officer must ensure the Principal Contractor:

- Develops and implements a comprehensive risk management plan to minimise risks to all parties.
- Provides or arranges access to appropriate welfare facilities for all workers throughout the project.

4.2 Other Council Staff commissioning and/or managing contractors on behalf of the Council

Council staff may occasionally commission contractors to perform low-risk activities such as onsite training, audits, routine maintenance, or inspections for certification. In some cases, they may request contractors to carry out emergency works. These activities are unlikely to involve construction or infrastructure works, or notifiable projects under CDM Regulations. Staff responsibilities in these instances are as follows:

4.2.1 General Responsibilities for All Contractors

Council staff commissioning contractors attending to lower risk activities must ensure that the contractors provide:

- Relevant information before work begins, including written risk assessments and/or method statements for activities posing significant risks to people, Council property, or the environment, as applicable.
- Demonstrate competence to perform their tasks safely and to the required quality standards.
- Are given relevant information about the work environment, including details of any significant hazards or risks.
- Receive appropriate guidance or briefings regarding safety and conduct, with records maintained where necessary. For work involving building fabric or services, guidance will be coordinated with the Facilities Officer; for other works, the relevant commissioning officer will oversee this.
- Comply with the Council's contractor management policies and procedures.
- If contractors will work in areas controlled by others, the commissioning staff must ensure:
 - Local staff and stakeholders are informed in advance of the work to be carried out, including where and when it will take place.
 - Work is coordinated with local staff to minimise risks to contractors, Council staff, and the public.

This ensures that even low-risk works are managed effectively and safely, while minimising administrative burdens.

4.3 People commissioning and/or managing contractors on behalf of the Council

4.3.1 All Contractors

Thornbury Town Council employees (or consultants or other persons appointed by the Council to undertake this role) who commission or manage contractors for, or on behalf of, the Council are responsible for ensuring that contractors under their control:

- Provide the Council with all required information before commencing work. Where work is to be carried out in Council-controlled areas and poses significant risks to any person, Council property, or the environment, this must include written risk assessments and/or method statements detailing how the work will be safely conducted. No work shall commence until these documents are reviewed and agreed upon by the relevant Council representative.
- Demonstrate the necessary competence to safely carry out the work they are employed to undertake, meeting the required safety and quality standards.
- Are supplied with adequate information, including details of any hazards or significant risks present in the work area, along with instructions to ensure they can safely perform their tasks.
- Receive a suitable and sufficient induction tailored to the nature of the work being carried out, with a record of the induction kept. For work involving building fabric or services, this induction will be provided by the relevant department. For all

other works (e.g., servicing of equipment), the responsibility will lie with the person commissioning the contractor.

- Are monitored at intervals appropriate to the level of risk associated with their work.
- Are aware of, and as far as reasonably practicable comply with, Thornbury Town Council's contractor management policies and procedures.

Where contractors are working in areas managed by other parties, the Council representative responsible for managing the contractor must:

- Provide timely notice to local management regarding the nature, location, and timing of the contractor's works.
- Coordinate and organise the works with local management to minimise risks to contractors, Council staff, and the public.

4.3.2 Construction Works on Building Fabric, Services, or Infrastructure

For works involving construction or maintenance of building fabric, services, or infrastructure, the Council representative must ensure that:

- The works are communicated to the relevant senior officer (Deputy Clerk or Facilities Officer) or their appointed representative as early as practicable and in all cases before work begins.
- Work on building fabric, services, or infrastructure does not commence until written approval has been provided by, or on behalf of, the relevant senior officer.
- Contractors:
 - Are provided with sufficient time to complete their works safely.
 - Receive suitable and sufficient asbestos information to mitigate the risk of exposure to, or uncontrolled release of, asbestos fibres.
 - Are easily identifiable to staff, residents, and members of the public.
- Work activities are coordinated and communicated to ensure significant risks are reduced to a tolerable level.

4.3.3 Notifiable Projects

For construction works classified as "notifiable" under CDM, the Council representative must ensure that the Principal Contractor:

Develops and implements an appropriate risk management plan to ensure works are carried out without significant risks to themselves or others.

Has made adequate arrangements to provide or gain access to appropriate welfare facilities for the duration of the project.

4.4 All Council Employees

All council employees are responsible for:

- Providing relevant Council representatives (those commissioning and/or managing contractors) with information about any hazards that may be present in areas where contractors will be working.

- Taking reasonable steps to ensure contractors, or anyone else, are not exposed to significant risks as a result of their work.
- Reporting any significant concerns regarding contractor activities to their line manager.

4.5 Monitoring

Thornbury Town Council's Finance and General Purpose Committee is responsible for monitoring and reviewing this policy. A full review will take place every three years to ensure the policy remains current and effective.

4.6 Document Control

- **Date of Last Review:** 11th February 2025
- **Date of Next Review:** Scheduled for February 2028