

MANAGEMENT OF CONTRACTORS POLICY

1. OVERVIEW AND PURPOSE

- 1.1 The University is a complex and diverse environment with contractors undertaking work on University premises for a variety of purposes at any given time.
- 1.2 The University is committed to ensuring that all work undertaken by contractors on its behalf is managed in a manner that protects the health, safety and wellbeing of staff, students, contractors, visitors, and the wider community.
- 1.3 This policy sets out the University's principles and requirements for the effective management of contractors and contractor activities. The policy supports compliance with relevant health and safety legislation, including the Health and Safety at Work Act 1974 and aligns with the University's commitment to risk management, legal compliance and responsible stewardship of its estate and operations.
- 1.4 This policy also sets out the University's arrangements for meeting its duties as a Client under the Construction (Design and Management) Regulations 2015, ensuring that construction projects are planned, managed, and delivered in a manner that protects health and safety throughout the project lifecycle.

2. SCOPE

- 2.1 This policy applies to all activities undertaken by contractors carrying out construction or project management activities that involve physical alterations or adjustments to campus buildings or assets:
 - On University premises; or
 - At locations under the control of the University; or
 - On behalf of the University where contractor activity may affect University operations, people, property, or the environment.
- 2.2 The policy applies to all University staff and Sussex Estates Facilities LLP ('SEF'), who commission, manage, supervise, or otherwise control contractor activities including works delivered through external Facilities Management providers.
- 2.3 For the purposes of this policy, 'contractors' includes, but is not limited to, organisations or individuals engaged to carry out construction, maintenance, repair, installation, servicing, or similar works, whether paid or unpaid.
- 2.4 For the purposes of this policy, 'construction work' has the meaning set out in the Construction (Design and Management) Regulations 2015 and includes all building, civil engineering, refurbishment, maintenance, repair, installation, alteration, and demolition works, regardless of size, duration, or value.

3. RESPONSIBILITIES

3.1 Vice-Chancellor

- 3.1.1 The Vice-Chancellor will provide leadership and executive oversight of Health and Safety. They are also accountable for ensuring that appropriate arrangements are in place for the effective management of contractor health and safety across the University.

3.2 Executive Deans of Faculty and Directors of Professional Services

- 3.2.1 Executive Deans of Faculty and Directors of Professional Services are responsible for health and safety matters relating to the activities of their Faculty or Division, whether these are undertaken on the institution's premises or elsewhere, and must ensure that:
- All applications undertaken by members of their Faculty or PS Division to appoint contractors for works are considered by suitably competent persons;
 - All applications undertaken by members of their Faculty or PS Division for contracted works are arranged and managed in collaboration with a relevant Estates function (Capital Projects or FM Services), including at design phase and during the appointment of suitable contractors;
 - Ensure that construction projects under their remit are managed in accordance with the Construction (Design and Management) Regulations 2015, including the appointment of duty holders where required;
 - Suitable contractors are identified and appointed in collaboration with the Procurement Office, where appropriate;
 - Mechanisms are established to ensure that all applications undertaken by members of their Faculty or PS Division to undertake projects or appoint contractors for works are considered in a timely manner via the relevant governance route;
 - Approved contractor activities appointed by members of their Faculty or PS Division are managed by suitably competent persons in accordance with relevant policies and procedures; and
 - The University's Health, Safety and Wellbeing Team is notified and given details of any contractor works which could have health and safety, or fire safety implications for staff, students, or visitors to the campus. University Health, Safety and Wellbeing staff must be involved at the design and planning phase and kept informed of the progress and development of such works.

3.3 Director of Estates, Facilities and Commercial Services

- 3.3.1 In addition to responsibilities outlined in 3.1 of this Policy, the Director of Estates, Facilities and Commercial Services is responsible for ensuring that:
- Suitable arrangements are in place for discharging the University's duties as a Client under the Construction (Design and Management) Regulations 2015, including systems for duty holder appointment, provision of pre-construction information, review of construction phase plans, and retention of health and safety files;

- Where construction work is undertaken, The Director of Estates, Facilities and Commercial Services (or a delegated authority) will ensure that all duty holders required under the Construction (Design and Management) Regulations 2015 are identified and appointed as necessary, including the Client, Principal Designer, Principal Contractor, designers, and contractors. Appointments must be made in writing where required and duty holders must have the appropriate skills, knowledge, experience, and organisational capability to fulfil their roles;
- Systems, procedures, and resources are in place to manage contractors safely and effectively;
- Contractors are suitable selected and managed through approved procurement and governance arrangements; and
- Suitable arrangements exist for contractor induction, supervision, monitoring, and incident reporting.

3.4 University staff commissioning or managing contractors

3.4.1 Staff commissioning or managing contractor works are responsible for ensuring that contractors under their control:

- Are competent to undertake the work;
- Receive appropriate information about local risks and site arrangements;
- Are adequately supervised and monitored, proportionate to risk; and
- Comply with applicable University policies and procedures and agreed risk controls.

3.4.2 Where staff do not have the sufficient competence to manage contractor activity, they must ensure that suitably competent support is engaged.

3.5 Project Managers

3.5.1 Project Managers responsible for contractor works must ensure that:

- Work is properly planned, risk assessed, and authorised before commencement;
- Facilities Management teams are engaged at the design and planning phase and kept informed of any progress and development of such works;
- Relevant risk assessments and method statements for works are reviewed and accepted by the appropriate Authorised Person as required;
- Suitable Construction Phase Plans are in place, proportionate to the scope and risk of the work;
- A senior contractor representative appointed for works (such as a site manager or supervisor) receives induction and necessary safety information at appropriate intervals ahead of, and during works and that suitable arrangements for induction of their operatives are in place;
- Works are appropriately monitored to ensure compliance with agreed arrangements; and
- Any non-compliance or significant safety concerns are escalated appropriately.

3.6 Authorised Persons (Permits to Work)

3.6.1 Authorised Persons are responsible for issuing, monitoring, and closing permits to work in specified areas or certain categories of high-risk work on University infrastructure, ensuring that:

- Permits are only issued to competent individuals;
- Work is controlled in accordance with University permit procedures;
- Additional safeguards are applied for higher-risk activities; and
- Appropriate supervision is in place for works requiring a permit.

3.7 Health, Safety and Wellbeing Team

3.7.1 The University's Health, Safety and Wellbeing Team is responsible for:

- Providing competent Health, Safety and Wellbeing advice, including Fire Safety;
- Supporting the development, monitoring, and review of contractor management arrangements;
- Advising on incident reporting and statutory notifications; and
- Advising on post-project and commissioning safety verification where required.

3.8 Contractors

3.8.1 Contractors engaged by the University are responsible for ensuring that all works under their control are carried out safely and in compliance with statutory requirements and University arrangements. In particular, contractors must ensure that they:

Legal Compliance and Duty of Care

- Comply with all relevant health and safety legislation, including the Health and Safety at Work etc. Act 1974, the Management of Health and Safety at Work Regulations 1999, and where applicable, the Construction (Design and Management) Regulations 2015.
- Discharge their duties as a contractor under CDM 2015, including cooperating with the Client, Principal Designer and Principal Contractor, and ensuring coordination of activities with other contractors.

Competence and Supervision

- Ensure that all personnel (including subcontractors) are competent, suitably trained, and experienced for the works they are undertaking.
- Provide adequate supervision proportionate to the risks of the work and ensure that subcontractors are effectively managed.

Risk Management and Safe Systems of Work

- Plan, manage and carry out work in a manner that ensures, as far as is reasonably practicable, that it is undertaken without risks to health and safety.
- Prepare, implement and maintain suitable and sufficient risk assessments and method statements (RAMS), and ensure these are communicated to all relevant operatives.
- Comply with all agreed control measures, permits to work and site-specific rules.

Cooperation and Communication

- Cooperate fully with the University and other duty holders, including sharing relevant information on risks and controls.
- Comply with instructions given by authorised University representatives relating to health, safety, wellbeing and site management.
- Ensure that all operatives and subcontractors receive appropriate induction and information relevant to the work on site.

Monitoring and Reporting

- Actively monitor their own work activities to ensure compliance with agreed arrangements and intervene to prevent unsafe acts or conditions.
- Report all accidents, incidents, near misses and unsafe conditions in accordance with University procedures and statutory requirements.

Insurance and Financial Responsibility

- Maintain appropriate and adequate insurance cover for the duration of the works, including as a minimum Employers' Liability Insurance and Public Liability Insurance, with levels of indemnity appropriate to the nature and scale of works.
- Provide evidence of insurance upon request and notify the University immediately of any changes or lapses in cover.

Welfare, Environment and Site Management

- Ensure that suitable welfare facilities are provided where required and that works are undertaken in a manner that minimises risk to the environment and disruption to University activities.
- Maintain a safe and tidy working environment at all times.

Non-Compliance

- Take prompt corrective action where non-compliance is identified.
- Acknowledge that failure to comply with legal requirements, CDM duties, or University procedures may result in suspension of work, removal from site, or termination of contract.

4. POLICY

4.1 Contractor Selection and Planning

- 4.1.1 Staff will only engage contractors who can demonstrate suitable competence, experience, and arrangements for managing health and safety.
- 4.1.2 Contractor activities must be planned in advance, with risks identified and appropriate controls established before work begins.

4.2 Risk Management and Authorisation

4.2.1 Contractor work must not commence until:

- Appropriate risk assessments and method statements have been reviewed and accepted; and
- Contractors have been provided with relevant information on local hazards and emergency arrangements.

4.2.2 Higher-risk activities including hot works, confined space works, work at height, isolation of services, excavations, asbestos-related works and works in laboratories must be subject to enhanced controls including permit to work or authority to access processes where applicable.

4.3 Information, Instruction, and Induction

4.3.1 Contractors must receive suitable induction and safety information proportionate to the nature and complexity of the work, including:

- Site-specific hazards and arrangements;
- Emergency procedures;
- Residential access procedures (where applicable); and
- Behavioural and conduct expectations while on University premises.

4.4 Monitoring, Supervision and Non-Compliance

4.4.1 Contractor activities must be supervised and monitored in proportion to risk. Unsafe acts or conditions must be addressed promptly, and work stopped where there is a risk to health and safety, only re-commencing when risks have been adequately addressed.

4.4.2 Failure by contractors or University staff to comply with this policy or supporting procedures may result in work being suspended, removal from site, or exclusion from future work, as appropriate.

4.5 Incident Reporting and Response

4.5.1 All contractor-related accidents, incidents and near-misses must be reported in accordance with University reporting arrangements. Statutory reporting requirements, including RIDDOR¹ must be met within prescribed timescales.

4.6 Application of the Construction (Design and Management) Regulations 2015 ('CDM')

4.6.1 The CDM Regulations apply to all construction work undertaken on behalf of the University. Where CDM 2015 applies, the requirements of this section must be followed in addition to the general contractor management arrangements set out elsewhere in this Policy.

4.6.2 **Client duties:** Individuals or teams acting on behalf of the University, as Client, must make and maintain suitable arrangements for managing construction projects to

¹ Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013

ensure that work is carried out, so far as is reasonably practicable, without risks to the health and safety of any person affected by the work. These arrangements will include ensuring that:

- Construction projects are properly planned, managed, and resourced;
- Sufficient time and resources are allocated at each stage of the project;
- Appropriate duty holders are appointed where required;
- Relevant health and safety information is prepared and provided to duty holders; and
- Suitable welfare facilities are provided throughout the construction phase.

These arrangements will be proportionate to the scale, nature and risks of the work and will be maintained and reviewed throughout the project lifecycle.

4.6.3 CDM duty holders and appointments: Where a construction project involves, or is likely to involve, more than one contractor, staff acting on behalf of the University must appoint in writing a Principal Designer, and a Principal Contractor. Appointments will be made as soon as practicable and before the relevant phase of work begins. Where required appointments are not made, the University will retain the associated CDM duties by default.

4.6.4 Pre-Construction Information: For all construction projects, Project Teams or those instructing works on behalf of the University will ensure that Pre-Construction Information ('PCI') is prepared and made available to designers and contractors at an appropriate stage before works commence. The level of detail provided will be proportionate to the risks and complexity of the project and may include, as appropriate:

- Existing health and safety files;
- Relevant surveys (e.g. asbestos, services, ground conditions);
- Information on existing structures, hazards or constraints;
- Details of site access arrangements, welfare provision and emergency procedures; and/or
- University site rules and local arrangements that may affect the works.

On projects involving more than one contractor, the Principal Designer will assist the University in collating, managing, and issuing the PCI.

4.6.5 Construction Phase Plan: Construction work must not commence until a Construction Phase Plan ('CPP') has been prepared by the contractor or Principal Contractor, as applicable, and has been reviewed by the University or its authorised representative. The CPP must set out the arrangements for managing health and safety during the construction phase and be proportionate to the nature, scale, and risks of the work. The plan must be kept up to date for the duration of the works.

4.6.6 Management and monitoring of construction work: Staff instructing works on behalf of the University will take reasonable steps to ensure that the Principal Designer and Principal Contractor fulfil their respective duties under CDM. This will include appropriate arrangements for cooperation, communication, supervision, and monitoring, proportionate to the level of risk associated with the work. Where unsafe practices, significant non-compliance, or material deviations from agreed

CDM arrangements are identified, work may be required to be stopped until appropriate corrective actions have been taken.

4.6.7 Health and Safety File: For construction projects involving more than one contractor, a Health and Safety File will be prepared by the Principal Designer. Project Teams or those instructing works on behalf of the University must ensure that the file is:

- Received at project completion;
- Reviewed for adequacy and completeness; and
- Retained and made available for future works, maintenance, refurbishment, or demolition activities.

4.6.8 Notification to the Health and Safety Executive: Project Teams or those instructing works on behalf of the University must ensure that construction projects meeting the notification thresholds under CDM are notified to the Health and Safety Executive (F10 notification) before the construction phase begins. Responsibility for submitting and maintaining the notification will be clearly allocated as part of the project arrangements.

5. LEGISLATION AND GOOD PRACTICE

5.1 Legislation

5.1.1 Please see below for related key legislation relevant to this policy area:

- [The Health and Safety at Work etc. Act 1974](#)
- [Management of Health and Safety at Work Regulations 1999](#)
- [Construction \(Design and Management\) Regulations 2015](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 \(RIDDOR\)](#)

5.1.2 Further guidance and best practice is provided by the [Health and Safety Executive \(HSE\)](#).

Review / Contacts / References

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	University Health, Safety and Wellbeing Policy Confined Spaces Guidance Safe Management of Hazardous Locations and Hazardous Procedures Policy Contractor Health and Safety Induction Checklist and Record Noise at work University webpage Electrical Safety University webpage Personal Safety and Lone Working University webpage Manual Handling University webpage Work at Height University webpage
Division:	Estates, Facilities and Commercial Services
Policy Owner:	Director of Estates, Facilities and Commercial Services
Point of Contact:	Head of Estates Operations