

The Association for Project Safety view on CDM2015, just over one year since implementation, and eight months after the end of the transition period.

The Association for Project Safety view is that, we, as an organisation:

- **Strongly recommend the early appointment of the Principal Designer at the concept design stage**
- **Support Health and Safety Executive implementation of The Construction (Design and Management) Regulations 2015:**
 - CDM2015 is a good workable piece of legislation that implemented properly and enforced will make construction site workers safer and healthier.
- **Do not consider an Approved Code of Practice is required:**
 - Managing Health and Safety in Construction (L153), provides good guidance
 - L153 is supported by the CITB/HSE Guidance for Clients, Designers, Principal Designer, Principal Contractors, Contractors and Workers
 - The construction industry has produced and is producing targeted guidance such as The Association for Project Safety Principal Designer's Handbook and Guide to the CDM2015 Regulations
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- **Have defined the role of Principal Designer:**
 - The Principal Designer must be a Designer, appointed in writing by the Client as Principal Designer with control over the Health and Safety elements of the Pre Construction Phase. One of the Design Team, may be best placed to undertake the role, but the Principal Designer does not have to be designing on the project. Note the sensible flexibility built into the Regulations to cater for the many faceted and amorphous shaped construction industry where virtually every project is unique. In common with Designers and Contractors, a Principal Designer must not accept an appointment to a project unless they (and/or) their organisation have sufficient Skills, Knowledge and Experience and organisational capability to undertake the role.
- **Realise that there is a requirement for the construction industry to provide many more Principal Designers (Design Phase Co-ordinators) and Principal Contractors (than required under CDM2007) due to the requirement for the Client to identify and appoint these roles if more than one contractor on the site at any one time and the same is true for the Principal Contractor:**
 - The construction industry is still working with insufficient suitable Principal Designers and Principal Contractors as the smaller end of the industry is still catching up with the changes in Regulations
- **Support the need for a Construction Phase Plan on every project:**
 - This must have a positive effect on planning for the Construction Phase but;
 - The Plan must be in existence and provide suitable "arrangements" for Health and Safety
 - Must be proportionate to the scale and risk profile of the planned project
- **Consider that on many projects the Pre Construction Phase will last until the end of the Construction Phase (Principal Designer appointment will last through until the end of the Construction Phase and will require the delivery of the completed Health and Safety File to the Client by the Principal Designer)**

- **Are shouting that HEALTH is important:**
 - For every fatal injury on a construction site, there are 100 deaths due to occupational disease caused by the work a construction worker has undertaken during their working life (that is the same as the largest Jumbo Jet filled with passengers crashing with no survivors at a rate of one per month every month).
- **Believe that Clients may need advice about Health and Safety management of construction projects and may need to find CDM advice and appropriate Advisors if the Principal Designers are not capable of providing additional Client advice over the Principal Designer role**
- **Consider the start on site is important and the Client will often require advice which may not be available from the Principal Designer in terms of:**
 - Sufficiency of the Construction Phase Plan for works to commence on site
 - Assessing whether the Principal Designer and Principal Contractor are complying with their duties
- **Believe in the importance of good well distributed Pre Construction Information complete with the assessment and filling of information gaps.**
- **Believe in the importance of good and well managed (by the Principal Designer) Design Risk Management**
- **Consider there is further work required by the construction industry to bottom out what is required relating to competency of duty holders (or as it is now called Skills, Knowledge, Experience and Organisational Capability)**
 - Heartening to see that Association for Project Safety Membership in the form of IMaPS/CMaPS are becoming a recognised standard in Pre Construction Design Risk Management.
- **Support the view that proportionality of the application of CDM2015 is paramount in that there must be:**
 - Appropriate Pre Construction Information and Design Risk Management
 - An appropriate Construction Phase Plan
 - An Appropriate Health and Safety File (if there are more than one contractor on site at any one time)
 - That for some low risk projects the above documents could well be collectively one page (or less)
- **The Association for Project Safety remit is to provide support for all of those involved with Construction Health and Safety, although predominately aimed at the Pre Construction Phase:**
 - We aim to ensure that our Members improve the chance of construction workers going home after their shift as healthy and safe as when they went to work
 - We provide support for Clients, Designers, Principal Designers, Principal Contractor and Contractors (and those who provide advice to these duty holders). Our Members lead in the area of Construction & Design Risk Management and where they have the relevant Skills, Knowledge and Experience, may take on any of the duty holder roles (as appropriate) as listed above as well as supplying advice to these [duty holders](#).