

Retail Safety Forum
CDM 2015 – Retailer
Compliance Guide Book

The retailers guide to completing property works



Rev 1 - 14 October 2015
Antony Flynn and Stephen Coppin

Institute of Occupational Safety & Health

Institute of Occupational Safety & Health (IOSH) are pleased to acknowledge as a professional body this sector guidance for Retailers on CDM5, as a whole. As this industry guide provides flowcharts illustrating the steps to go through for the large construction projects to the emergency maintenance and repair works, including acquisition and disposal that are typical in the retail sector. Which helps support the HSE's L153 guidance and the CITB Industry Guidance.

International Institute of Risk and Safety Management

Increasingly centralised guidance becomes more generic as it targets all audiences in the vast and diverse construction sector. This Guide helpfully picks up on this challenge and provides specific retail sector support following typical procurement or projects we experience in the retail sector. This adds to the HSE's L153 guidance and the industry (duty holders) guidance by providing, for example, relevant project-type information if you are engaged in design, refurbishment or disposal. IIRSM is pleased to acknowledge the contribution and assistance it offers to improving risk management.

Association of Project Safety

The APS is delighted to support this guidance for retailers and we look forward to working with the Retail Safety Forum on a safer, healthier future for construction in this sector.



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The following document is an agreed list of expectations for health and safety standards between all retailers to encourage a standard way of working to ensure consistency of approach and commitment from the client, supply chain partners and trades alike.

This document does not supersede any guidance or requirement laid out by any statute or client based information. It is an agreed way of demonstrating compliance to the CDM Regulations 2015. Retailers and their property and maintenance departments/teams will be referred to as the 'client' in all instances in this document. The attached list of signatures is included to encourage all retailers, shopkeepers and high street businesses to follow the industry guide as a simplistic way to meet the legal requirements as noted.

This guidance is intended to provide all retailers with advice relating to their duties as a client under the Construction (Design and Management) Regulations (CDM) 2015 and other construction related Health & Safety Legislation.

This guidance document has been developed by the Retail Safety Forum (RSF) a number of retail organisations and is supported by the British Retail Consortium (BRC) and the Health & Safety Executive.

It's purpose is to provide guidance and sign posting to assist retailer's with their project team plan, design, manage, coordinate and monitor construction projects without risk to health and / or safety of those who can be affected. These regulations apply during development, refurbishment, operation, maintenance, asset replacement/repair and demolition/disposal of their properties. It has no legal status.

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The group would also like to acknowledge the support of APS, the IOSH, IIRSM, British Retail Consortium (BRC) and the HSE who kindly reviewed this guidance.

The Health and Safety Executive was consulted in the production of this guide. It endorses the sensible, proportionate, reasonable and balanced advice to retail clients for managing construction health & safety set out in this guidance.

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The Retail Safety Forum (RSF) have agreed the content of this document in the interests of raising occupational health and safety standards, offering a consistent approach for their supply chain. It must be stated that all previous responsibilities remain the same and every project must be considered on a risk profile case by case basis, before applying all or any of the requirements laid down in this document.



The **co-operative**

John Lewis



Sainsbury's



Why is this guidance useful?

All building, maintenance and repair works on all properties must be managed without risk to health and / or safety of those who may be affected by that work.

These changes will impact on how a retail organisation is required to plan, manage, coordinate, monitor and review construction and maintenance activities across their estate.

The key changes incorporated within CDM 2015 are:

The new requirement for the client to appoint a Principal Contractor and a Principal Designer in suitable time for maintenance and building works (regardless of size or duration) that are likely to include more than one contractor on site at any time during the construction works.

- Replacement of the previous ACOP with Managing Health and Safety Construction. Construction (Design and Management) Regulations 2015. Guidance on Regulations L153
- Removal of the CDM Coordinator role and the legal appointment of the new role of Principal Designer, who is a designer with control during the pre-construction phase who can demonstrate the necessary capabilities e.g. skills, knowledge, experience related to health and safety coordination within the planning and design
- Removal of the term “competence” within the regulations. Using skills, knowledge and experience including necessary training (e.g. information, instruction, supervision and training) relevant to their role and type of project
- The notification requirement to the HSE Requirement (F10). The threshold of over 500 persons days and/or over 30 days duration of works as notification the trigger is now joined by where there is more than 20 workers at any time during the project on site at any given time will now be notifiable to the HSE

Who should use this guidance?

The guide is for all retail clients and their supply chain employees whose remit includes any or all involvement in instructing works involving building works, maintenance or repair to a property or building controlled by the retailer (client) or any subsidiary.

People who should use this guidance/who is the retail client?

Any retail employer, who:

- ultimately decides what is to be constructed, where, when and by whom;
- commissions the design and construction work (the employer in contract terminology);
- initiates the work;
- is at the head of the procurement chain; and appoints contractors (including the principal contractor) and designers (including the principal designer);
- and/or representative (e.g. project manager, employers agent etc) who instructs construction works on behalf of a retail client organisation, as defined under the CDM Regulations

Who is a client?

Under these regulations, a client is any individual or organisation for whom a construction project is carried out.

Tests to help determine who is client:

- who ultimately decides what is to be constructed and where, when and by whom
- who commissions the design and construction work (the employer under the contract)
- who initiates the work
- who is at the head of the procurement chain
- who engages the contractors

What is an appointment?

Regulation 8 of CDM 2015 requires that designers (including the principal designer), or contractors (including the principal contractor) appointed to work on a project must have the skills, knowledge and experience — and if they are an organisation, the organisational capability — necessary to fulfill the role that they are appointed to undertake, in a manner that secures the health and safety of any person affected by the project. The requirement under CDM 2015

A person who is responsible for making the necessary appointments under CDM 2015 such as clients must take "reasonable steps" to ensure those appointed have the necessary skills, knowledge and experience to fulfill their duties. This will depend on the complexity of the project and the range and nature of the risks involved. The steps taken should be proportionate with the risks to be encountered and should not be burdensome or over- bureaucratic. Pre-qualification checks should be made which should include where necessary checks on organisational capability using accredited members of the Safety Schemes in Procurement Forum (SSIP) (www.ssip.org.uk) and may find the questions that are incorporated in Publicly Available Specification 91, 2013 Construction related procurement — Prequalification Questionnaires (PAS 91) useful.

When considering the requirements for designers, architects and other construction professionals, consideration should be given to membership of an established professional institution or body. For example, bodies that have arrangements in place which may provide some reassurance that health and safety has formed part of their route to membership of their profession. This may include for example, organisations such as the Royal Institution of Architects (RIBA), Institute of Civil Engineers (ICE), Construction Institute of Building (CIOB), Association of Project Safety (APS) etc and the individual providing in-house or client's health & safety advice a chartered member of the Institute of Occupational Health & Safety (IOSH) and / or Fellow member of the Institute of Risk Safety Management (IIRSM) on the Occupational Safety & Health Register (OSHCR). It is important for skills and knowledge to be kept up to date and therefore enquiries should check that procedures for continuing professional development are in place.

Definitions and meaning for reference:

Project: A project which includes or is intended to include construction work and includes all planning, design, management or other work involved until the end of the construction phase.

Construction work: (*for full definition see reg. 2) Means the carrying out of

- Construction
- Alteration
- Conversion
- Fitting out
- Commissioning
- Renovation
- Repair
- Upkeep
- Redecoration or other maintenance
- Demolition
- Installation, commissioning, maintenance, repair or removal of mechanical, electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services normally fixed within or to a structure
- Preparation for an intended structure including site clearance, investigation (not site survey) and excavation (but not pre-construction archaeological investigations)
- Dismantling of a structure
- Assembly on site of prefabricated elements to form a structure or disassembly on site of the prefabricated elements

What will these regulatory changes mean to a retail client overseeing building or maintenance works?

These changes will affect all construction works carried out on retail property. To assist in the understanding of duties now imposed, a series of flow charts along with clients guidance have been produced for the scenarios below:

Scenarios retail: What are you (the retail client) planning to do? How should you now proceed?

The following flowchart gives an overview of how CDM should be applied by retail clients. The flowchart should then be used in context to reflect specific retail construction scenarios (as indicated below).

A. (Main usage chart) Refurbishment on an existing property or building of a new property or work space

B. Acquisitions of land and buildings

C. Small works, asset replacement or planned maintenance works (non emergency work excluded)

D. Selling, vacating or disposing of a property, building or work space.

E. Designing for works on a property, building or work space

F. Emergency maintenance and repairs

Remember!

The list below constitutes work that is also classed as construction, and as such, CDM is applicable.

- All static/fixed asset replacement works
- All fixed plant related to the property (including roof mounted or plant located in service yards)
- Any works to a Petrol Filling Station
- Any works to the fabric of the building or that supports the function of the building e.g. Roofs, cladding panels and basements
- Any works to fixtures, fixed equipment, IT, comms, infrastructure or any concession within the property
- Any planned maintenance or static equipment works including reactive and repair works
- Any roll out or property improvement initiatives
- Any asbestos removal related works

What to do next:

1. Select the flow chart path that relates to the works you are about to consider. SELECT from A-F
2. For building, maintenance and asset works - If the works involve more than one contractor ALWAYS use the CDM flowchart A
3. Consult your Client Specific CDM chart to ensure the duty holder identified is involved in the works.
4. Use the reference material with the appendices as required.
5. Sense check what you are doing by contacting the in house property safety team/H&S advisor and /or the Principal Designer as identified on the Client Specific CDM chart.

The accompanying notes with each flow chart will give further background to the requirements placed on specific roles. In particular as a client there have been significant changes which require additional input and checking throughout the life of a project. To assist in the understanding of the clients' role, a further overview of responsibilities has been produced along with a Clients checklist both to follow CDM regulations and appointing work to "designers" and "contractors".

Sufficient information, instruction, training and supervision is provided in line with necessary skills, knowledge, experience and training through the project work.

Retail client - now choose a path...

A. Refurbishment of an existing property or a building a new property / new space.

Appendix 2

B. Acquisition of land and buildings

C. Small works, asset replacement or planned maintenance works (non emergency work excluded)

D. Selling, vacating or disposing of a property, building or work space.

E. Designing for works on a property

F. Emergency maintenance and repairs

(Please note if at any point the number of contractors involved is likely to become more than one... then the chosen path should be the pink path.)

Definition of terms

Key:

Retail Client - RC

Principal designer - PD

Principal contractor - PC

Contractor - C

Pre Construction Information - PCI

Construction Phase Plan - CPP

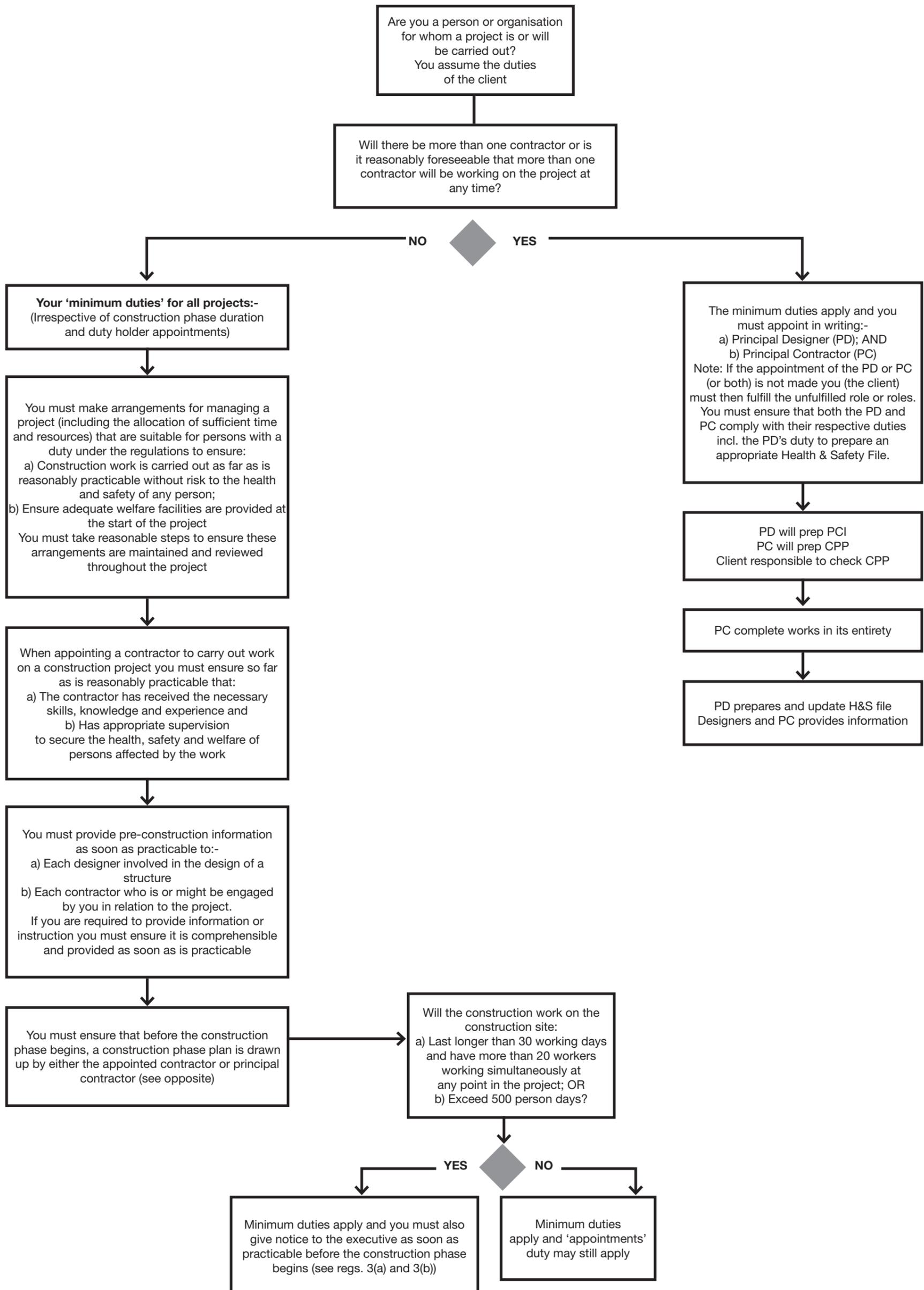
Refurbishment or Demolition survey - R or D (Asbestos)

Asbestos Management Plan - AMP

Skill, Knowledge, Experience & Training - SKET

A. Refurbishment of an existing property or a building a new property / new space / emergency repair

The default path



Retail Client Due Diligence Checklist

The Client under CDM will be referred to as the Retail Client from hereon-in within this document.

Your 'minimum duties' for all projects:-

	Yes	No	N/A
Will there be more than one contractor or is it reasonably foreseeable that more than one contractor will be working on the project at any time? If more than one contractor follow 2 and 3 below.			
Retail Client must appoint in writing:- a) a Principal Designer (PD) b) and a Principal Contractor (PC).			
If the appointment of the PD or PC (or both) is not made in writing Retail Client must then fulfil this role or both.			
Retail Client must ensure that both the PD and PC comply with their respective duties, incl. the PD's duty to prepare an appropriate Health & Safety File.			
The Retail Client must assess the capability and resources of all appointments in consultation with their in house or to assist in their duties with a appointed CDM-H&S Advisor(s).			
The PD will prepare relevant pre construction information (PCI) to brief the PC on the project.			
Is Building pre-2000 – therefore requiring existing register within asbestos management plan and based upon the finalised scope of works a refurbishment or demolition asbestos survey by a competent asbestos surveyor who is P402 qualified or equivalent using independent lab.			
If applicable - Are there change to floor loading requiring structural surveys where applicable and any temporary works requiring a Temp Works Coordinator.			
The PD will update and provide the Pre-Construction Information identifying remaining hazards and any related significant risks related to the design and project to the PC.			
If applicable - Are there changes to loadings or upgrading of services or ground works requiring utility surveys where applicable.			
The Contractor or PC will prepare a Construction Phase Plan (CPP) to demonstrate risk control of safety risk identified in the PCI.			
The Retail Client must ensure they are satisfied that the CPP is adequately developed before the construction phase begins, a Construction Phase Plan is in place by either the appointed Contractor or Principal Contractor.			
The Retail Client must satisfy themselves that the PC kept the construction phase plan up to date and relevant to the works ensuring that appropriate arrangements are in place to manage the changes and risks to health and safety.			
The Retail Client must ensure the PD prepares and update H&S file by completion of the works.			
Retail Client has a duty apply to ensure that notice is given to the HSE, as soon as practicable before the construction phase begins if the project duration construction work on the construction site: a) Last longer than 30 working days and have more than 20 workers working simultaneously at any point in the project; OR b) Exceed 500 person days?			
Retail Client must ensure arrangements for managing a the project (including the allocation of sufficient time and resources) that are suitable.			
The requirements for suitable welfare facilities are in place at the start and throughout the construction phase and they are maintained and reviewed throughout the project.			
When the Retail Client is appointing a Designer or PD and contractor or PC to carry out work on a construction project you must ensure so far as is reasonably practicable that a) They have the necessary skills, knowledge, experience and the necessary training to fulfil their duties information, instruction and training and b) Has appropriate supervision to secure the health, safety and welfare of persons affected by the work.			
Retail Client must ensure that format, contents and number of copies of the Health & Safety File are agreed within the contract to be provided at practical completion.			

Appendix 1 Capability and Resources (Skills, Knowledge, Experience and Training)

What your Principal Designer practice should include:

At a principal designer organisational level:

1. Identified H&S Advisor for strategic Project Assistance as per MHSWR Regulation 7
2. Safety Schemes in Procurement SSIP and/or PAS 91 Accredited
3. Suitable cover with Professional Indemnity/Public Liability – Evidenced
4. Evidence of a suitable training scheme identified by RIBA
5. Demonstrable and evidenced – Technical knowledge, resource and experience relevant to the given project(s)
6. Demonstrable skills, knowledge and resource to influence health and safety through the feasibility, design process, construction phase and post completion
7. Evidence of a skills gaps analysis for the required skill sets to safely fulfill their defined duties
8. Able to demonstrate the use and appointment of specialist for any identified skills gaps
9. Demonstration of compliance to HSG65 / OHSAS 18001 / Proposed ISO 4500 and can evidence established processes
10. Evidence procedures to manage, prepare, review and coordinate information at the pre-construction stage
11. Evidence of a CPD, chartered organization or working towards a professional or safety related association

At an individual Principal designer level:

1. As the principal designer, you must be have design experience and knowledge for the project and be in a position to have control and influence over the design, particularly risks to health & safety. As an important member of the project team they should have the authority to influence the management of health and safety on the project
2. The principal designer can be an individual or ideally an organisation with:
3. A technical knowledge relevant to the project
4. Someone who recognises how health and safety should be managed and coordinated through the design process
5. The skills to be able to influence the management and coordination of health and safety during the pre-construction phase of the project and any on-going design and particularly prior to any significant changes during construction phase
6. As the principal designer, they should consider whether they have any gaps in their own skills, knowledge, experience in line with their CPD and if so, liaise with other specialists to assist
7. Although an organisation could be appointed to undertake the role, an individual with the right skills, knowledge, experience and relevant training should be identified and named, as the point of contact. Good relationships with the client and designers working on the project are essential, also with principal contractor
8. A RIBA / APS / IOSH / IIRSM etc recognised CDM15 Design Risk Management Course with confirmation test or examination. A bespoke course with adequate syllabus and assessment to understand and fulfill the duties
9. A One Day Training in CDM15 Regulations Awareness Course - As validated by the Retailer or APS or IOSH or IIRSM etc or recognised professional body and delivered by experienced trainer/tutor
10. Over 3 years experience in undertaking Design H&S Coordination e.g. CDMC, Design H&S Adviser, Design H&S Coordinator etc on similar projects
11. Evidence of CPD covering CDM15 and construction related H&S legislation, including Temp Works etc

At principal contractor organisational level:

1. Membership to a SSIP recognised scheme
2. Evidence of an established training scheme of operational site based supervisors and managers – SMSTS/SSSTS or IOSH Managing Safety
3. Evidence of an acceptable enforcement and accident history
4. Provide and evidence a CV for the site team demonstrating relevant capability, resource and experience
5. Identified a competent and independent health and safety advisor/resource and time allocation to the project
6. Evidence of accreditation to HSG 65 awarding body
7. A demonstrable process for investigating accident and incidents
8. Evidenced process for monitoring, audit and review
9. Evidence of a CPD scheme and records of suitable training provided
10. Have a demonstrable process for vetting and assessment contractor for capability and resource such as SSIP/PAS 91 and its future replacement
11. Has a demonstrable process to show CDM 2015 compliance and procedures for prevention and control
12. Demonstration of compliance to HSG65 / OHSAS 18001 / Proposed ISO 4500 and can evidence established processes

At individual principal contractor level:

Experienced, capable and qualified site supervisor provided to the scheme with as a minimum:

- SMSTS/SSSTS or IOSH Managing Safety Qualification
- First Aid Qualified – Course meeting national curriculum
- Fire marshal trained/FPA as required by Retail Client

All management and supervisory staff employed on site by either the principal contractor or as a supervisor for trades deemed to require a dedicated supervisor under risk assessment will have that demonstrable level of competence on site at all times.

For those supervisors the required standard is Site Safety Supervisor Training Scheme (SSSTS/SMSTS) or equivalent. Such trades as: scaffolding, steelwork, ground works, demolition, asbestos removal, roofing and cladding, piling, timber frames and concrete trades must always provide a full time SMSTS/SSSTS trained supervisor on site.

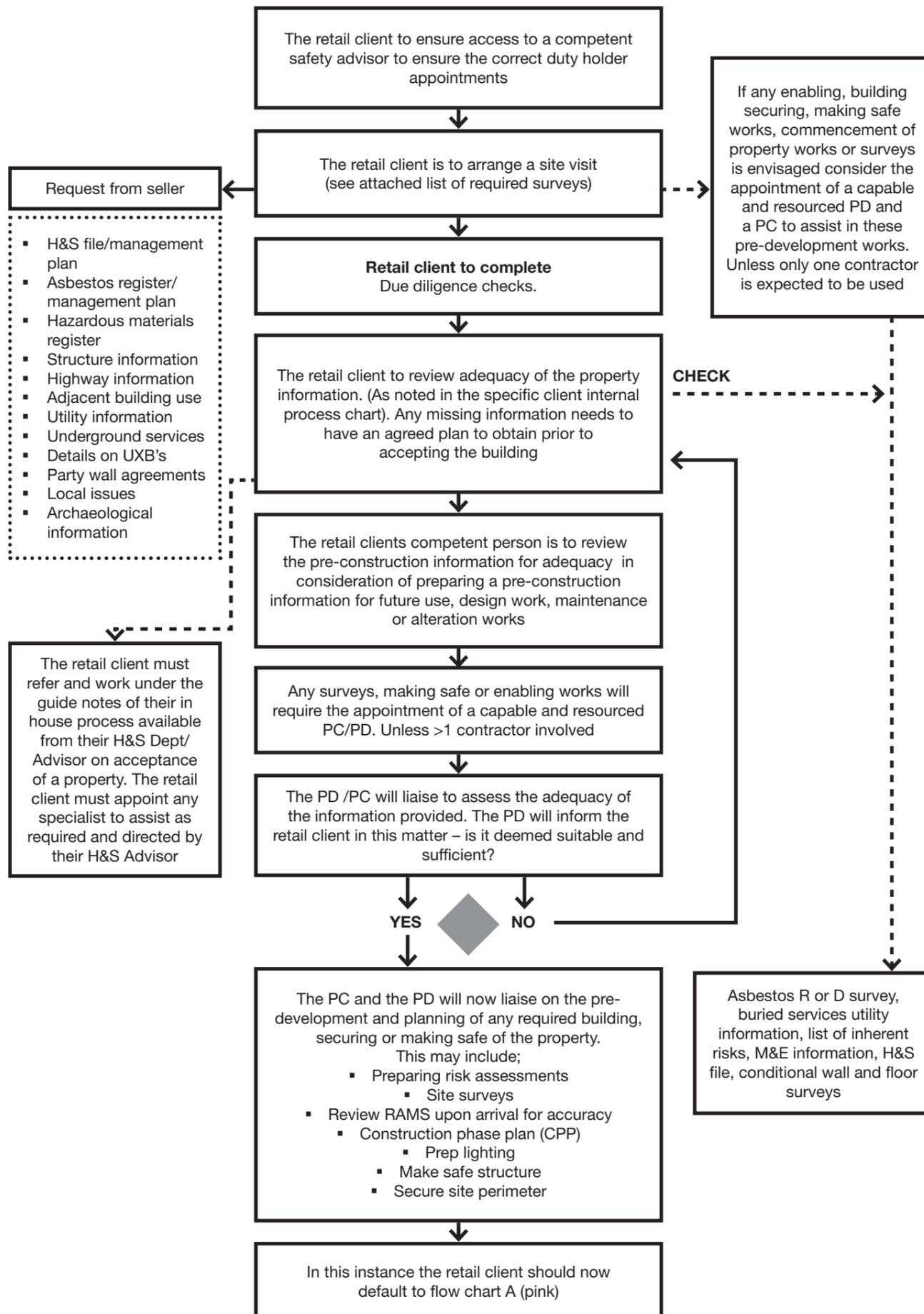
All tradesmen and operatives employed on site will have a demonstrable level of skill, incorporating health & safety training e.g. a CSCS card at the appropriate level for the activities to be undertaken.

This is in addition to any specialist or specific trade, task or safety training which has been undertaken. These requirements will be confirmed by capability and resource checks. Where English is not the first language of a site operative the employing Contractor will be required to employ a clearly identifiable supervisor/translator to ensure that key safety information is understood by all non English speaking personnel on site.

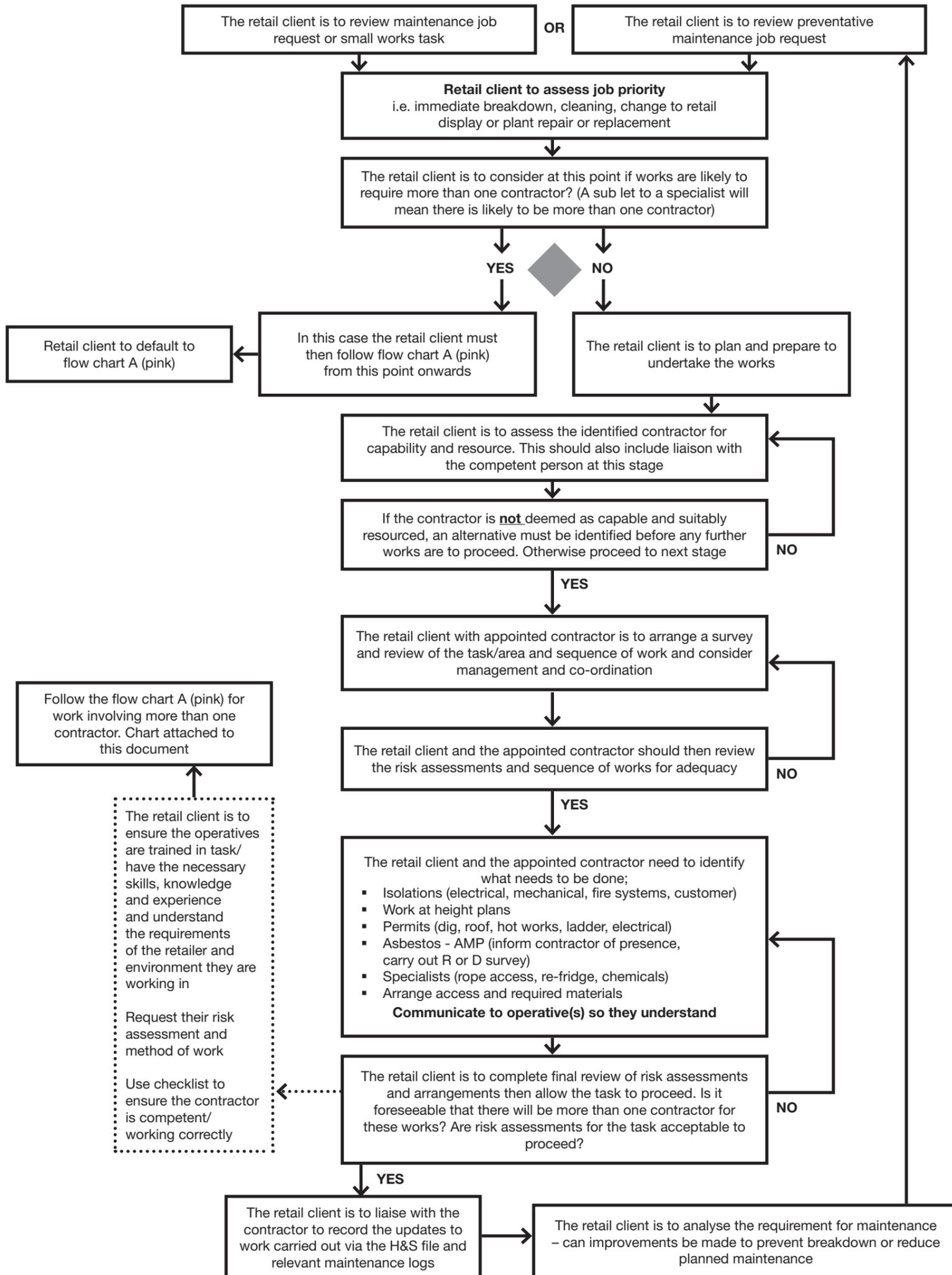
Additional skills, knowledge, experience and training by qualifications and relevant training for the Designer, Principal Designer, Principal Contractor and Contractor will dependant on the type of project and associated risks, as should be assessed by the Client at the procurement and tender stage.

Appendix 2

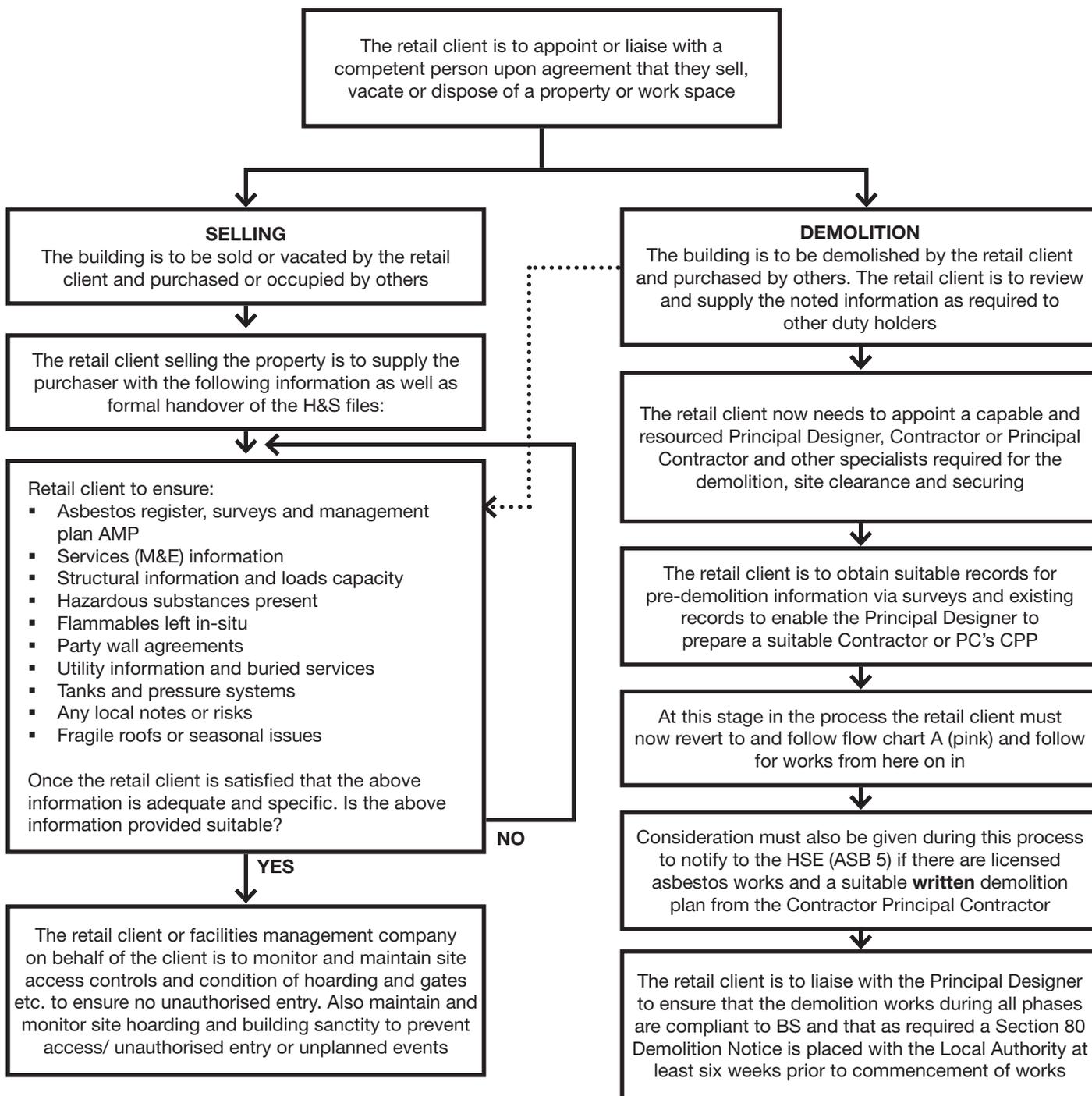
B. Aquisition of land and buildings



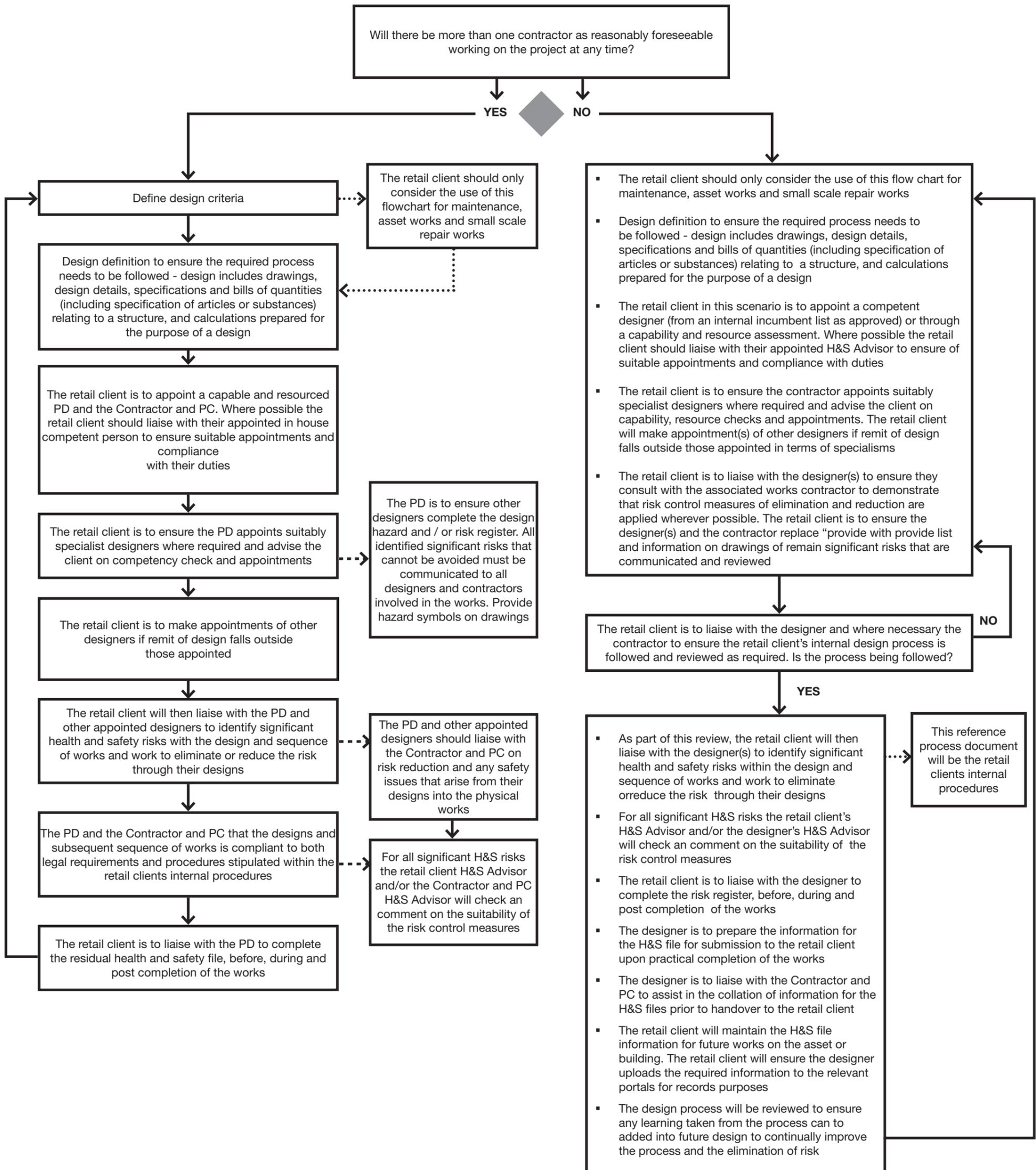
C. Small works, asset replacement, planned maintenance or repair works (non emergency work excluded)



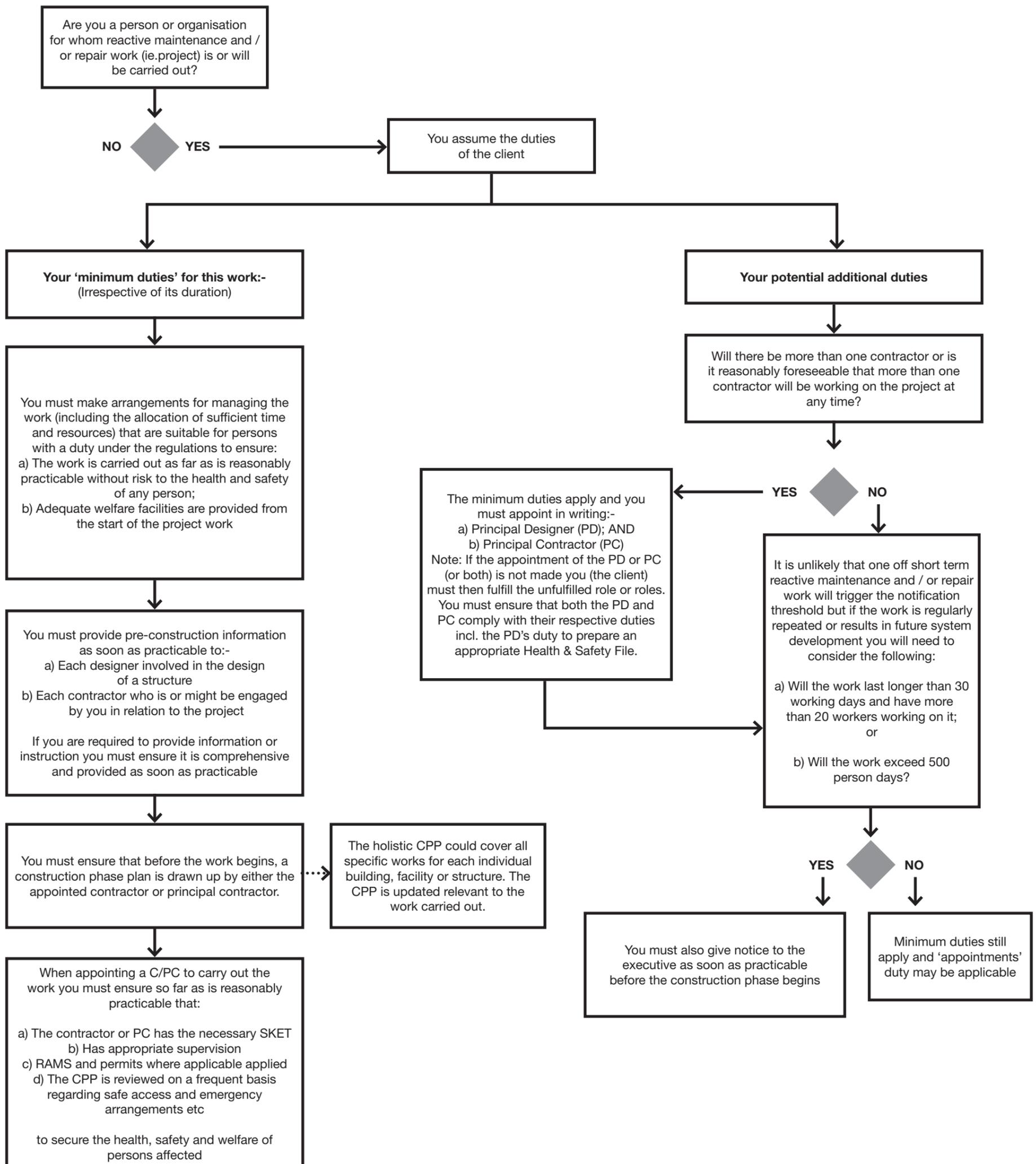
D. Selling, vacating or disposing of a property, building or work space



E. Designing for works on a property



F. Emergency maintenance and/or repair works



Explanatory notes

Capability and Resources (skills, knowledge, experience and training):	You must ensure that contractor(s) you appoint (and their subcontractors) have received appropriate information, instruction and training and have appropriate supervision to undertake the work. Other contractor competency assessment questions to consider:-		
	Have they previous similar work experience? Can you take up references from other clients?	Do individuals have appropriate categories of CSCS / CPCS cards or other relevant specialist training?	Have supervisors attended SMSTS training courses and/ or have appropriate trade Supervisors' cards?
	Are they currently accredited to a 3rd party H&S management scheme in 'SSIP' or similar?	Do they pro-actively consult with their employees and provided adequate instruction?	Do they have appropriate EL, PL and PI insurance cover?
	Have they access to suitably experienced H&S advisors?	How do they assess the competency of their subcontractors?	Do they monitor their own H&S performance?
	Have you reviewed sample risk assessments & method statements? Are they detailed enough?	Do they have previous RIDDOR notifications and /or prosecutions? Have they improved their H&S performance accordingly?	<i>Note: when appointing designers you will also need to consider if they also have previous similar experience & appropriate professional qualifications.</i>
Pre Construction Information (PCI):	<p>This is information in your possession or which would be reasonable to obtain (by commissioning surveys) that is relevant to the work and is sufficiently detailed/proportionate to the risks involved, including information about:-</p> <ul style="list-style-type: none"> ▪ The project; ▪ Planning and management of the project; ▪ Health and safety hazards including design and construction hazards and how they will be addressed (e.g. relating to existing live services, work taking place in occupied buildings, asbestos containing materials, structural survey findings, ground contamination issues); and ▪ Information in any existing Health and Safety File. <p><i>Note: If appointed, the Principal Designer can assist you to prepare this information; the PD must also ensure the pre-construction information is promptly provided to designers and contractors.</i></p>		

Principal Designer duties:	The Principal Designer role not only replaces the former CDM Coordinator role, but has greater duties to ensure designers fulfil their duties:	
	Planning, managing and monitoring the pre-construction phase	Ensuring cooperation and coordination
	Passing information on to the Principal Contractor	Preparing the health and safety file.
	Ensuring designers comply with their duties	Ensuring that where reasonably practicable, risks are eliminated or controlled through design work
	Assisting the client in preparing the pre-construction information	

<p>Designer Duties:</p>	<ul style="list-style-type: none"> ▪ A designer must not commence work in relation to a project unless satisfied that the client is aware of the duties owed by the client under these Regulations. ▪ When preparing or modifying a design the designer must take into account the general principles of prevention and any pre-construction information to eliminate, so far as is reasonably practicable, foreseeable risks to the health or safety of any person— ▪ Carrying out or liable to be affected by construction work; ▪ Maintaining or cleaning a structure; or ▪ Using a structure designed as a workplace. ▪ If it is not possible to eliminate these risks, the designer must, so far as is reasonably practicable— ▪ Take steps to reduce or, if that is not possible, control the risks through the subsequent design process; ▪ Provide information about those risks to the principal designer; and ▪ Ensure appropriate information is included in the health and safety file. ▪ A designer must take all reasonable steps to provide, with the design, sufficient information about the design, construction or maintenance of the structure, to adequately assist the client, other designers and contractors to comply with their duties under these Regulations.
<p>Notification:</p>	<p>You are responsible for ensuring this notification is made as soon as practicable before the construction phase.</p> <ul style="list-style-type: none"> ▪ The notification notice must contain the specific details listed in Schedule 1 of the Regulations; and ▪ Be clearly displayed on site where it can be read (and understood) by any worker engaged in the construction work. The notification may need to be updated if the work changes.
<p>Construction Phase Plan:</p>	<p>This Plan should be written by either your appointed Contractor or Principal Contractor. It includes their health and safety arrangements and specific site rules for the construction phase of the project. This Construction Phase Plan must be available for all projects irrespective of the project duration. Certain high risk activities require that very detailed measures for controlling these risks are specified in the plan – see reg.2.</p>
<p>Principal Contractor duties:</p>	<p>There are no significant additions or changes to the Principal Contractor’s duties from those detailed in CDM 2007, other than the need to liaise with the Principal Designer now instead of the previous CDM Coordinator (CDM 2007).</p>
<p>Part 4 - General requirements:</p>	<p>These are the technical minimum standards expected during the construction phase of the works and include requirements relating to site security, excavation work, traffic routes, emergency arrangements and lighting amongst others. For the full requirements see regs. 15-34. These arrangements have not changed significantly from those in CDM 2007.</p>
<p>One or more clients?</p>	<p>If there is more than one client, one or more of the clients may elect in writing to be treated as the only client or clients with duties under these Regulations.</p>

Health & Safety File:	<p>You must ensure that when you have appointed a Principal Designer, they prepare a Health & Safety file for the project. This must contain information relating to the project which may be needed for any future construction work e.g. changes to electrical services locations/ structural changes.</p> <p>The file should:</p> <ul style="list-style-type: none">▪ Include all information in your possession about asbestos containing materials: their location, condition and your associated management plan (your full duties are detailed in the Control of Asbestos Regulations 2012);▪ Be revised from time to time to include relevant new information; and▪ Be kept available for inspection by any person who may need it to comply with their H&S responsibilities now or in the future.
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