



Control of Contractors Policy and Procedure

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POLICY

1. Introduction

The University of Wolverhampton (the University) has a duty of care to ensure the health, safety and welfare of all staff, visitors and volunteers and any other person who may be affected by the activities of Contractors operating on the University's estate, so far as is reasonably practical.

Contractors and subcontractors must also ensure that their work is carried out safely and in accordance with the health and safety at work act. All contractors must ensure that they have the necessary skills, knowledge and experience to carry out work safely.

2. Purpose

There is a critical need to protect both people and the integrity of our Estate, its infrastructure, fabric and services under the general duty of care imposed by the Health & Safety at Work Act 1974 when contractors are operating on the university estate.

- To protect people, contractors need to be effectively managed by having a clearly documented understanding of when and where their work is taking place and that the risks from those activities, including safeguarding, have been adequately reviewed and addressed. Also, that the contractors are aware of any risks that the University estate and population may pose to them.
- To protect the estate, we must ensure that all work procured and/or managed by the University that impacts on its infrastructure, specifically work that could:
 - Penetrate any passive fire materials or fire compartments
 - Disturb asbestos containing materials
 - Affect the structural integrity of a building
 - Disturb buried services

Is prohibited without the express approval of the Estates and Facilities Directorate. This enables the review of compliance with the Health and Safety at Work Act, 1974 (as amended) but also more specifically subordinate legislation such as the Construction, (Design and Management) Regulations 2015 (CDM), Control of Asbestos Regulations 2012 and the Building Safety Act 2022.

The quality of Contractors' work needs to be managed to prevent additional residual risks remaining as a result of their workmanship.

3. Principles

The implementation of this policy is in accordance with the University's core values which are to be:

- **Accountable**; we take pride in what we do and how we do it, take responsibility for our actions and operate with transparency and integrity.
- **Resilient**; we have a positive outlook; we are adaptable and recover from setbacks.

- **Inclusive**; we are welcoming, respectful, collegiate and supportive.
- **Ambitious**; we are imaginative, confident, innovative and deliver excellence.

4. Scope

This policy and procedure will apply to all members of staff who procure and/or manage any Contractors that visit or operate on the University's estate. This includes deliveries and non-Estates & Facilities managed work.

Contractors whose work involves the penetration of or alteration, addition to or removal from the building infrastructure, fabric or services will require a more detailed and documented management approach.

University staff who fail to adhere to the terms of this policy may be subject to disciplinary action, up to and including dismissal.

5. Definitions

Contractor. A contractor is any person or company who provides services to a client under specific terms, or a specific contract.

Sub-contractor. is a party which agrees to perform part or all of the work requirements of another party (contractor) under a separate contract. The subcontractor will usually be engaged by a main contractor to perform a specific task or set of tasks within a broader project; subcontractors are usually appointed where specialist services/skills are required.

All Contractors. for the purposes of this policy are both contractors and sub-contractors.

Competent Person. individuals who have the relevant skills, knowledge (qualifications) and experience to carry out specified tasks, such as recognising hazards, and assisting with placing sensible controls in place to protect individuals from harm, for complex or large projects, the competency requirement may be met by a team rather than by an individual. However, clear accountabilities should be established within the team to ensure that duties are assigned to the appropriately competent team member.

The Construction (Design and Management) Regulations 2015 applies to all **Construction Work** and prescribes the roles responsibilities and action required by each party involved in Construction Work.

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

- 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;

- 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;
- 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;
- 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;
- 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.

CDM Notifiable projects: under the Construction (Design and Management) Regulations 2015 (CDM) a construction project that is a notifiable project is a project that meets certain criteria regarding its duration, workforce and workload; and can indicate high risk and therefore require specific safety measures to be put into place. These include projects that are scheduled to last more than 30 days, have more than 20 workers working, and/or exceed more than 500 person days.

All notifiable projects that fall within this remit must be notified to the Health and Safety Executive (HSE). The HSE must be notified using the F10 form ([HSE - F10 - Notification of Construction Project](#)).

6. Roles and Responsibilities

The Vice-Chancellor (VC) has the overall day to day responsibility for health and safety matters at the University. The VC delegates responsibility for undertaking aspects of these duties through line management and identified roles. This policy is specifically aimed at ensuring the integrity of the Universities infrastructure, physical assets and services.

Director of Estates and Facilities has delegated responsibility for approving and overseeing all works on University building fabric and services. The Director of Estates and Facilities delegate the day-to-day management of these duties through the Estates and Facilities line management chain.

The Director of Estates and Facilities will ensure that:

- The Control of Contractors Policy is communicated to relevant teams/management and that this policy is read and understood by all relevant parties before any work is undertaken.
- All applications to carry out work on University-owned or managed building fabric or services or infrastructure are considered in a timely manner by a suitably competent person.
- All duty holder appointments required by the CDM Regulations are made for E&F managed projects.
- Where there is sufficient reason to believe that any duties associated with CDM notifiable projects cannot be met then the project work should be halted and the Vice Chancellor advised.
- All projects subject to Estates and Facilities' approval are managed by a suitably competent person.

- Adequate resources, including reasonable access to competent project managers, are available to enable the University to manage construction works in accordance with legislative and policy requirements.
- Faculties and Directorates are provided with adequate information about routine works that Estates and Facilities' contractors will be carrying out in their areas. This will include giving sufficient advanced notice of when, where and how such works will be carried out and ensuring adequate communications with local management about matters which could affect the health, safety or welfare of members of the campus community whilst the works are delivered.

In the event of an emergency situation, where there is a significant risk of imminent injury or of significant damage to property, the requirement to provide notice to local management may need to be waived in order to ensure that the University does not breach its duty to manage such significant risks.

Deans, Heads of Departments & Directors are responsible for ensuring that:

- All proposed works to building fabric or services or infrastructure are communicated, at the earliest opportunity, to the Director of Estates and Facilities (or the appointed deputy) for approval and in any case before any such works are commenced.
- People who may be commissioning and/or managing contractors for works controlled by the Faculty or Directorate are competent to do so. Where the required competency to manage specific contractors or projects is not available within the Faculty or Directorate then the commissioner/manager shall engage a suitably competent person to manage these works on their behalf.
- Sufficient competent people have been appointed, where relevant, to implement and manage Faculty or Directorate permit to work systems.
- Suitable and sufficient information about local hazards (in addition to those related to building fabric and services) are communicated to contractors working in their areas.
- Their staff cooperate with other duty holders under this policy to ensure that the Management of Contractors policy is implemented effectively.
- Procurement or design for works on University-owned or managed building fabric or services or infrastructure is not started unless and until approval for these works has been provided in writing to them by the Director of Estates and Facilities (or appointed deputy). If Estates and Facilities are subsequently appointed to manage the project on behalf of the Faculty or Directorate then all subsequent contractor management responsibilities under this policy will transfer to Estates and Facilities.

If the Director of Estates and Facilities agrees that the works can be managed locally then all duties, except those explicitly placed on the Director of Estates and Facilities, will fall to the Faculty or Directorate engaging and managing the contractor(s).

Project & Contract Managers are responsible for ensuring that

The person managing a project or contract where a contractor is engaged to deliver services shall:

- Ensure they are competent to manage the contractor through qualification and experience. If they have any doubts, these should be escalated to their line manager to seek additional support or expertise.
- Comply with all relevant legislation for the type of work taking place.
- Comply with all University policies, procedures and management plans that are applicable to the work being undertaken, taking particular note of those listed in section 12.
- Where possible, use contractors in the University's existing supply chain that have already been assessed for competence, suitability and for compliance with public procurement regulations.
- Share all hazard information with the contractor, review the contractor's RAMS and maintain records of these activities.
- Confirm that where Sub-Contractors are to be used, they meet the same selection criteria as the Principal Contractor and are held to the same standards of work. Sub-contractors should be sufficiently supervised by the Contractor, or Principal Contractor in the case of CDM work.
- Manage the Contractor's activities on site.
- Notify the occupants of the area/building in advance of the work taking place prior to it commencing, to agree how when and where the work will take place. Also to confirm that all risks have been considered prior to work commencing and managed throughout e.g. reporting any hazards/accidents/incidents: identified from ongoing projects.
- Ensure that Contractors are informed of the University's Contractor conduct expectations as specified in section 7 below.
- Notify All Contractors that parking is not generally available on City South campus and any exception to this, including unloading materials or making deliveries, needs to be pre-arranged with Security.

7. Policy

This policy and supporting procedures/documents set out the agreed approach to protecting the welfare of the university population during contractor visits and maintaining the integrity of the University's infrastructure, physical assets and services. This will be achieved by adhering to the following:

- Performing appropriate checks of each of its contractors prior to the letting of any contract (or establishment of any framework agreement) to ensure, so far as is reasonably practicable, that it only engages suitably competent contractors to carry out works on its behalf.
- Providing contractors with the necessary instruction, information, site induction and supervision to undertake their work in accordance with this policy and all other relevant health and safety policies and any specific legislative requirements that might apply (<https://www.wlv.ac.uk/about-us/corporate-information/wlv-policies/>).

- All contractor work that involves, to any extent, work on building fabric, services or infrastructure are approved, in writing, by the Director of Estates and Facilities (or their appointed officer). No such works will be allowed to commence until this approval has been provided. This will include the installation of any services not managed by Estates and Facilities, such as the installation of data cabling or new faculty equipment, where this requires work on building fabric or services and/or places significant demand upon the utilities' supply.
- Providing contractors with suitable and sufficient asbestos information from the asbestos register(s), at tender stage, to enable them to plan and deliver their works without risk of exposure to, or the uncontrolled release of asbestos fibres. This should then be reviewed at the time of work to ensure there has been no change.
- Only allowing contractors to commence work once they have provided and implemented, suitable and sufficient risk assessments to manage any significant risks associated with their works.
- For construction work, comply with the Construction (Design and Management) Regulations 2015 (see **5. definitions** and the link to the regulations below) ensuring that construction works and projects are planned so that there is adequate time to deliver these safely and also:
 - In the case of CDM projects, work will only be allowed to commence when the Principal Contractor has provided a suitable and sufficient Construction Phase Plan and has put in place adequate welfare arrangements, approved by the Principal Designer.
 - Notify the Health and Safety Executive (HSE) of all University CDM Notifiable construction projects as soon as is reasonably practicable. The University may instruct the Principal Contractor or another agent to notify the HSE on their behalf.
- Overseeing and monitoring all contractor works under the direct control of the University. Oversight will be carried out by a person (or persons) appointed by the University based on their qualifications and experience to competently oversee the work.
- Implementing "Permit to Work" arrangements for the management of specified high-risk works. Permits to Work will only be issued by suitably competent and appropriately authorised persons (Further information on permits to work is in section 12).
- Monitoring contractor performance at appropriate intervals, dependent upon the nature and scale of the work, and taking appropriate corrective action where performance or health and safety issues are identified. This includes reviewing overall contractor performance at the end of each contract/project and implementing, where practicable, any significant findings.
- Ensuring that contractors provide all necessary information, documentation and certificates upon completion of the work to ensure that the University can meet its general and specific health and safety responsibilities.

Contractor/Third Party Conduct

The University is committed to providing a safe, respectful and inclusive environment for all staff, students, apprentice learners, contractors, third parties and visitors. We expect everyone working on our premises or on behalf of the University to uphold these values and comply with the following standards of conduct:

The University of Wolverhampton is committed to providing a positive work and study experience for all those part of the University Community everyone should feel safe, with us providing an environment that is free from discrimination, harassment and/or bullying and affirms the rights of all our members to be treated with dignity and respect.

Collective responsibility and a whole University response within the University community, including visitors and any third parties in attendance is needed to achieve this. Therefore, our expectation is that all contractors and third parties attending site abide by these principles and engage in any work in a manner that is in accordance with our policies and procedures (<https://www.wlv.ac.uk/about-us/corporate-information/wlv-policies/>).

All Contractors are encouraged to report any instances they observe whilst on the University's estate, through the appropriate channels indicated below. Any concerns raised by any member of the University community regarding any improper contractor/third party activity will be managed through the appropriate channels, according to the circumstances.

Sexual Misconduct and Harassment

The University has a **zero-tolerance approach** to sexual misconduct and harassment. All individuals must refrain from any unwanted behaviour of a sexual nature – verbal, non-verbal or physical – which violates another person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

In line with the **Worker Protection (Amendment of Equality Act 2010) Act 2023**, and Office for Students E6 Condition of Registration the University will take **all reasonable steps to prevent sexual harassment** of its staff, students and others by contractors and/or third parties.

Please see our [Single Comprehensive Source of Information](#).

Discrimination

Contractors/third parties must not unlawfully discriminate against, harass or victimise any person on the grounds of a protected characteristic as defined by the **Equality Act 2010** (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation).

The University promotes equality, diversity and inclusion in all activities and expects the same from all others involved in any activity for or on behalf of the University of Wolverhampton.

Harassment and Bullying

All forms of harassment and bullying are unacceptable. Contractors and third parties must treat everyone with dignity and respect and must not engage in conduct – whether verbal, physical or online – that could reasonably be perceived as bullying, harassment or victimisation.

Reporting and Accountability

All contractors/third parties are required to:

- **Abide by these principles** as a condition of working on/attending the University estate.
- **Report any incidents** of sexual misconduct, harassment, bullying or discrimination they experience or observe while on University premises.
- **Report incidents immediately** to the University Security Team, the member of staff they are in communication with.

Breaches of this standard may result in **removal from site, termination of contract**, and, where appropriate, **referral to statutory authorities**.

University Responsibilities

The University will:

- Provide clear reporting routes and support to anyone affected.
- Take all reasonable steps to prevent and respond to harassment and sexual misconduct, consistent with the **OfS Condition E6** and the **Worker Protection Act 2023**.
- Ensure contractors and their staff are made aware of these expectations during the induction process.

8. Data Protection Requirements

When personal data is expected to be used under this policy, staff must adhere to applicable data protection laws. These are outlined in the University's Data Protection Policy and related policies (<https://www.wlv.ac.uk/about-us/corporate-information/wlv-policies/>). Any use of personal data should be detailed in the relevant privacy notice and processed in accordance with all data protection principles.

For processing activities that may carry high risk; completion of a Data Protection Impact Assessment (DPIA) may be required. This is determined by answering a series of screening questions included in the DPIA template. The Data Protection Team is available to provide assistance and guidance with any part of this process, please contact them via email: dataprotection@wlv.ac.uk.

Please note that whilst the Data Protection Act does not cover aggregate data, it must be ensured that small numbers held within aggregate data sets do not inadvertently identify individuals.

9. Training

Training for university staff will be made available in a range of formats according to the needs of the trainee and different groups of staff and others as necessary. However, where the complexity of a project and the time required to become qualified and competent is apparent and would cause a

significant delay to delivery, it is preferred to engage the services of another member of staff who already has the capability.

All contractors' staff should be confirmed as being sufficiently qualified and experienced to undertake the allocated role on university premises.

10. Exceptions

There are no exceptions to this policy.

11. Amendments

This Policy was approved by the University's Executive Board on 14 April 2026. The University may change this Policy at any time, and where appropriate. Where a policy is not due for review, but is found to require updating, it will remain published, unless the reasons for review render it obsolete.

12. Information and Resources

[Maintaining Building Integrity Policy](#)

Project Initiation Document- available from E.F.Capitalprojects@wlv.ac.uk

E&F Permit to Work procedure- available from E.F.Compliance@wlv.ac.uk

E&F Safe Working Practices for Contractors- available from E.F.Compliance@wlv.ac.uk

E&F Contractor Induction Information- available from E.F.Compliance@wlv.ac.uk

[CDM Regulations- HSE Guidance](#)

Please see below link for all University Policies including:

- Sexual Harassment Framework
- Safeguarding Policy
- Personal Relationships Policy

<https://www.wlv.ac.uk/about-us/corporate-information/wlv-policies/>

13. Contact

For guidance, support and queries regarding this policy please contact:

Estate Health, Safety, Compliance and Risk Manager – Andy Watterson
University of Wolverhampton, Wulfruna Street, Wolverhampton WV1 1LY
A.Watterson@wlv.ac.uk

Estate Deputy Health, Safety Compliance and Risk Manager – David Purchase

University of Wolverhampton, Wulfruna Street, Wolverhampton WV1 1LY
D.Purchase@wlv.ac.uk

For general queries, please contact the Corporate Compliance Team via email: compliance@wlv.ac.uk.

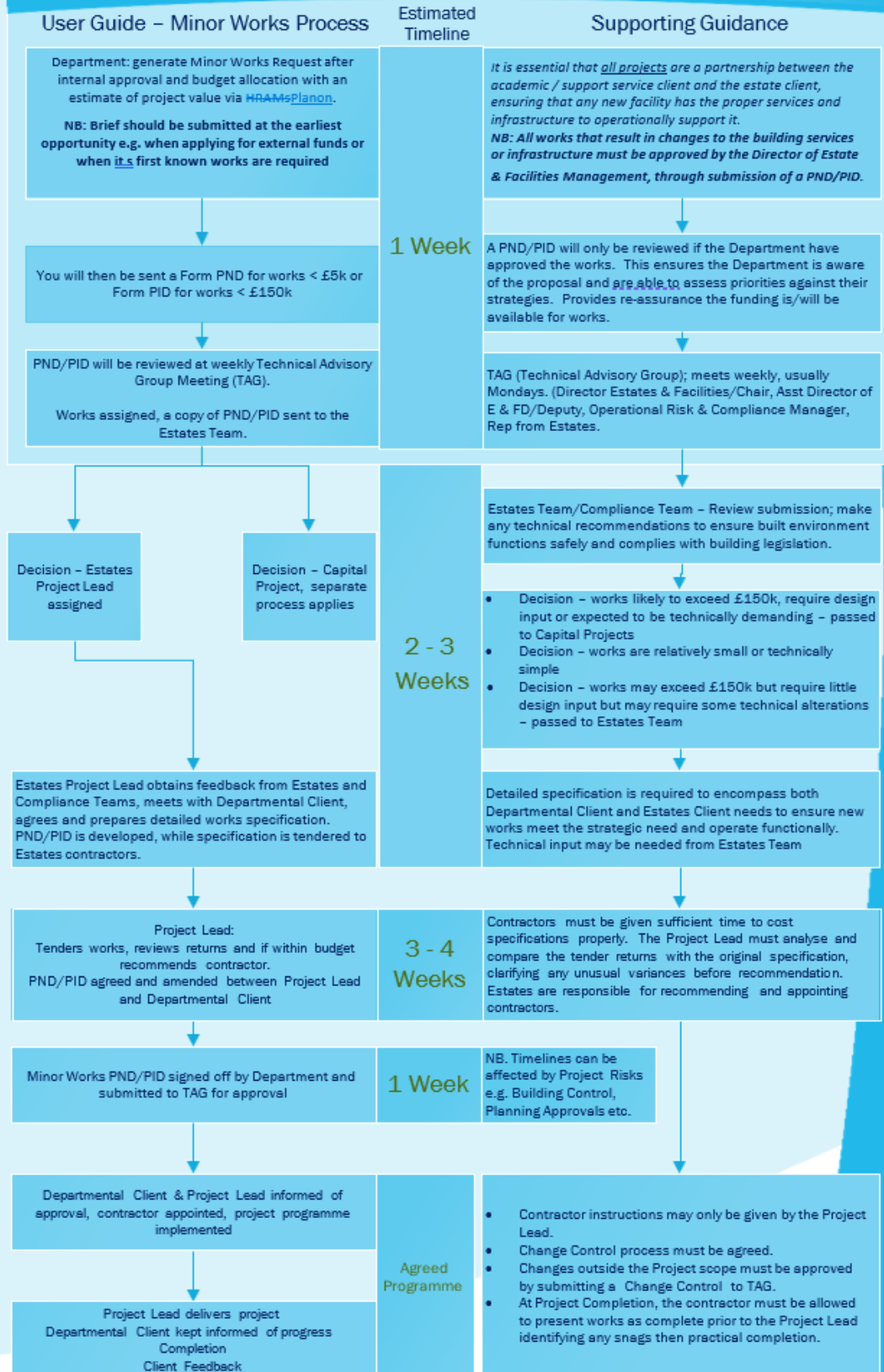
VERSION	2.0	AUTHOR/OWNER	Andrew Watterson Estates Health, Safety, Compliance & Risk Manager
Approved Date	14 April 2026	Approved By	University Executive Board
Review Date	14 April 2029		

Contractor Management Process

Before any construction work is procured or construction Contractor commissioned, the Faculty/Directorate/Department must, after going through the University approval process, seek permission from Estates and Facilities via a submission through Planon.

This enables the process to be documented, monitored and reported upon. Dependent upon the size of the project, it will be categorised as Minor Works or a Capital Project and further, more detailed documents/investigations will be instigated.

The Minor Works Process Map is shown below:



Commissioning and/or Managing Contractors for the University

University employees (or consultants or other persons appointed by the University to undertake this role) commissioning or managing contractors for, or on behalf of, the University will be responsible for ensuring that the contractors under their control:

- Provide the University with all required information before they are permitted to commence work. Where the work will be carried out in University controlled areas; and poses significant risks to any person; or to University property or to the Campus environment then this will include the provision of written Risk Assessments and Method Statements (provided by the contractor) to clearly describe how the work will be carried out and managed to minimise any residual risks as much as reasonably practicable. Such works will not be allowed to commence until these have been agreed by Estates and Facilities.
- Have the necessary competence to undertake the work they are employed to carry out and to deliver that work to the required quality/safety standards.
- Are provided with suitable and sufficient information, including information on any hazards or significant risks that may be present in the areas that they will be working, and instruction to safely carry out the works expected of them.
- Receive a suitable and sufficient induction appropriate to the work that they will be doing and that a record of this induction is kept. Where activities involve works on building fabric and services then Estates and Facilities will provide this induction. For all other works, for example servicing of Directorate-owned equipment, this responsibility will fall to whoever commissions the contractor to undertake this work.
- Make their presence known to the E&F Compliance Team at the start of each shift on site and notify them when they are due to depart.
- Wear a University issued Contractor lanyard and ID badge.
- Adhere to the University's permit to work process.
- Are monitored at appropriate intervals depending on the risks associated with their works.
- Are aware of and as far as is reasonably practicable, comply with the University's Control of Contractors policy and any associated procedures.

Where a project involves the contractor working in areas that are controlled by others (e.g. other faculties, directorates and tenanted buildings), then the University representative responsible for managing the contractor will be responsible for ensuring that:

- Local management are given timely notice about what contractor works will be carried out, and where and when these will be undertaken.
- Works are coordinated and organised with local management to ensure that the risks to contractors and to other members of the campus community are reduced to the minimum level that is reasonably practicable.

Construction Works, Works on Building Fabric, Services or Infrastructure in University Controlled Areas

If the proposed works will involve construction works or other works on building fabric, services or infrastructure, including passive fire materials, the commissioner will, in addition to the responsibilities in **Section 6** be responsible for ensuring that:

- The works are communicated as soon as is practicable to the Director of Estates and Facilities (or their appointed deputy) via Planon but in any case, prior to any works being carried out.
- Works on building fabric or services or infrastructure are not started unless and until these have been approved in writing by, or on behalf of, the Director of Estates and Facilities, or their appointed officer.
- The Construction (Design and Management) Regulations 2015 are complied with in full.

Appointed contractors:

- Are allocated sufficient time to deliver their works safely.
- Are provided with suitable and sufficient asbestos information to reduce the risk of exposure to, or uncontrolled release of, asbestos fibres.
- That the relevant Permits to Work are in place and displayed.
- That job specific Method Statements and Risk Assessments are approved.
- Are easily identifiable by other members of the campus community.
- Works are communicated and coordinated to ensure that significant risks associated with those works are reduced to a tolerable level.

Maintaining Building Integrity Policy (see section 12 for a link to the policy)

A detailed policy outlining the considerations and controls to be taken prior to any work that breaches the building fabric across the University Estate is included in Section 12. This policy does not only impact on what are regarded as significant changes to the environment, it also includes small changes, those that are potentially perceived as insignificant actions, examples:

- Coat hooks discreetly screwed into walls/doors
- Wall hangings

CDM Projects

All construction work is covered by the Construction (Design and Management) Regulations 2015 (CDM Regulations) and appropriate measures must be taken. See Section 12 for detail.

CDM Notifiable Projects

A notifiable construction project, under the CDM Regulations, is a project that requires notification to the Health and Safety Executive (HSE) using the F10 form. A project is notifiable if it is scheduled to last longer than 30 working days and have more than 20 workers on site simultaneously, or if it will exceed 500 person-days.

Where the construction works are “notifiable” projects under the CDM Regulations then the project will be managed in its entirety by the Estates and Facilities Directorate.

Permit to Work

A 'permit to work' is a formal system stating exactly what work is to be done and when, and which parts are safe. A competent person should assess the work and check safety at each stage. The people doing the job sign the permit to show that they understand the risks and precautions

necessary.

When work is deemed high risk, it will be subject to a Permit to Work issued by Estates and Facilities. Such activities are, but not limited to:

- Hot Work e.g. welding, hot roofing works
- Work involving Passive Fire Materials
- Confined Spaces e.g. work in a boiler, roof space
- Natural Gas – breaking into gas lines in boiler room
- Working at Height e.g. roof access maintenance without edge protection
- Biohazard maintenance activities
- Excavations creating a confined space
- Local exhaust ventilation
- Pressure systems

The Permit to Work Issue Procedure and Permit are included in Section 12.

Safe Working Practices for Contractors

Estates and Facilities have produced “Safe Working Practices for Contractors” guidelines for issue to Contractors prior to working on site. A copy of which is included in Section 12.

Induction

All Contractors will be subject to Site Induction. A copy of the E&F induction is available from e.f.compliance@wlv.ac.uk