

BRADFORD WATTS

EXPECTATIONS OF A NON-DIRECT SUB-CONTRACTOR POLICY

PURPOSE:

This document defines the standards, controls, behaviours, and compliance obligations required of all non-direct sub-contractors working under Bradford Watts Ltd. It establishes robust expectations aligned with UK legislation, industry best practice, and the Construction (Design and Management) Regulations 2015 (CDM 2015). The objective is to ensure that all subcontracted activities are carried out safely, competently, and to the highest quality.

SCOPE:

This policy applies to all:

- Non-direct sub-contractors
- Labour-only subcontractors
- Agency-supplied labour
- Specialist subcontractors and consultants
- Any third-party operatives engaged to carry out works on behalf of Bradford Watts Ltd or our clients
- This document forms part of the mandatory compliance framework for all project participants.

LEGISLATIVE FRAMEWORK AND CORE RESPONSIBILITIES:

Bradford Watts Ltd Responsibilities:

- In line with CDM 2015 (as a Contractor), Bradford Watts Ltd will:
- Ensure suitable management arrangements are in place for all work.
- Provide relevant site information including CPP, drawings, sequencing, welfare arrangements, and emergency procedures.
- Review and approve subcontractor RAMS and competency evidence.
- Monitor subcontractor performance and enforce compliance.
- Coordinate with the Principal Contractor, Designer, and Client as required.

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Sub-Contractor Responsibilities:

In accordance with CDM 2015 (as a Contractor or Worker, depending on engagement), subcontractors must:

- Plan, manage, and monitor their own work safely.
- Cooperate with Bradford Watts Ltd and the Principal Contractor.
- Provide competent operatives with evidence of training.
- Produce and implement suitable and sufficient RAMS.
- Prevent risks to their workforce and others on site.

Comply with all current legislation, including but not limited to:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- CDM Regulations 2015
- Work at Height Regulations 2005
- Manual Handling Operations Regulations 1992
- PUWER 1998 & LOLER 1998
- RIDDOR 2013
- Fire Safety Order 2005
- COSHH Regulations 2002
- Environmental Protection Act 1990
- Equality Act 2010

PRE-START REQUIREMENTS:

Before commencing work, subcontractors MUST provide the following:

- Competency and Worker Evidence
- CSCS cards (correct role and endorsement)
- NVQs, trade qualifications, and manufacturer-approved training
- Copies of relevant plant operator tickets (CPCS/NPORS)
- Evidence of medical fitness if undertaking safety-critical work
- Face-fit certification for RPE (where required)

Documentation:

- Task-specific RAMS compliant with CDM, current guidance, and BW site requirements
- COSHH assessments and Safety Data Sheets
- Public Liability Insurance (minimum £5m) and Employer's Liability Insurance (minimum £10m)
- Plant inspection records and LOLER certificates
- Method-specific permits or licences (e.g., hot works, IPAF/MEWP, confined space qualifications)
- Evidence of worker right-to-work compliance
- No subcontractor shall begin work until formal BW written approval has been issued.

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INDUCTION, BRIEFINGS AND SUPERVISION:

Site Induction:

All subcontractors must attend:

- Principal Contractor site induction
- Bradford Watts Ltd project induction (where applicable)
- Area-specific or high-risk task briefings

Supervision:

Sub-contractors must provide:

- A competent working supervisor (SSSTS or SMSTS recommended depending on scale)
- Competent persons for high-risk activities (e.g., hot works, roof access, scaffold modifications)
- A supervisor responsible for ensuring RAMS compliance and coordination with Bradford Watts Ltd management

Behaviour, Conduct and Site Standards:

Sub-contractors must:

- Comply fully with Bradford Watts Ltd Behavioural Management & Conduct Policy
- Treat all personnel with respect; abusive or discriminatory behaviour will not be tolerated
- Maintain professional standards of communication and cooperation
- Wear mandated PPE at all times (minimum: safety boots, hard hat, high-vis, gloves, and task-specific PPE)
- Keep work areas clean, tidy, and hazard-free
- Avoid smoking or vaping except in designated areas
- Never work under the influence of drugs or alcohol (zero-tolerance policy)
- Any breach of conduct may result in immediate removal from site.

Health and Safety Requirements:

Safe Systems of Work

Sub-contractors must:

- Work strictly in accordance with approved RAMS
- Cease work if conditions become unsafe and inform Bradford Watts Ltd management
- Follow correct access arrangements—no unauthorised ladder use or unsafe shortcuts
- Use plant and tools that are inspected, tested, and appropriate for the task

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WORK AT HEIGHT:

Where work at height takes place, subcontractors must:

- Use fall arrest or fall prevention systems as defined in RAMS
- Ensure scaffolds, towers, MEWPs, and edge protection are compliant and inspected
- Never climb on non-designated structures or materials

HOT WORKS:

Where hot works are carried out:

- Hot Works Permits must be in place
- A trained fire marshal must be available
- Fire watch procedures must be followed for a minimum of 60 minutes post-work

INCIDENT AND NEAR-MISS REPORTING:

Sub-contractors must:

- Report all incidents immediately
- Cooperate fully with investigations
- Provide statements or documentation as required under RIDDOR

QUALITY ASSURANCE AND WORKMANSHIP:

Sub-contractors must:

- Follow drawings, specifications, and manufacturer instructions
- Ensure materials are stored, handled, and installed correctly
- Comply with relevant British Standards and industry codes of practice
- Notify Bradford Watts Ltd of design discrepancies or buildability issues early
- Rectify defects promptly at their own cost

ENVIRONMENTAL CONTROLS:

Sub-contractors must:

- Follow site-specific environmental management plans
- Segregate waste in accordance with site arrangements
- Prevent pollution, avoid spillages, and use drip trays where needed
- Use dust suppression, noise reduction, and nuisance mitigation measures
- Handle hazardous materials in line with COSHH and environmental legislation

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MATERIALS, DELIVERIES AND PLANT:

- Deliveries must be pre-booked and coordinated with BW site management
- Vehicle movements must follow traffic management plans
- All plant must be fit for purpose, inspected, and compliant
- Operators must hold valid certification
- Unsafe plant will be removed from site at the subcontractor's cost

COMMUNICATION AND REPORTING:

Sub-contractors must:

- Attend daily briefings, toolbox talks, and coordination meetings
- Inform Bradford Watts Ltd of issues, delays, or risks immediately
- Provide daily labour returns or progress updates when required

MONITORING, AUDITS AND PERFORMANCE MANAGEMENT:

Bradford Watts Ltd will carry out:

- Routine safety inspections
- Formal audits
- RAMS compliance checks
- Quality inspections
- Poor performance may result in:
 - Non-conformance notices
 - Re-training requirements
 - Removal from site
 - Removal from approved contractor lists
 - Withholding of payments until issues are resolved

NON-COMPLIANCE AND CORRECTIVE ACTION:

- Where subcontractors fail to meet expectations:
 - Verbal warnings may be issued for minor breaches
 - Written warnings or NCRs will be issued for significant breaches
 - Sub-contractors may be ordered to stop work
 - Persistent non-compliance may result in contract termination
 - All corrective actions must be undertaken promptly and at the subcontractor's expense.

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REVIEW AND AMENDMENT:

- This document will be reviewed annually or following:
- Legislative changes
- Significant incidents
- Major procedural updates

Bradford Watts Ltd will communicate all revisions to subcontractors.

SUB-CONTRACTOR ACCEPTANCE:

All subcontractors must provide written confirmation that they have read, understood, and will comply with this policy and procedure before commencing work.

F. Pimley,
SHEQ Manager



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