

Policy Document

Organising and Managing Subcontractors

Setting out the standards and requirements
Somerset Gas will apply when acting as
Principal Contractor.

2026

Policy for organising and managing subcontractors (Principal Contractor Arrangements).

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2.0	03/05/26	Joe Lewis	Second Issue	Mark Lewis

1. Purpose

Somerset Gas is committed to ensuring that subcontractors are selected, inducted, coordinated, supervised, and controlled in a manner that supports the safe delivery of work and protects the health and safety of workers, clients, occupants, and members of the public.

This policy sets out the standards and requirements Somerset Gas will apply when acting as Principal Contractor, in accordance with the Construction (Design and Management) Regulations 2015 ("CDM 2015").

2. Scope

This policy applies to all Somerset Gas employees, managers, supervisors, and subcontractors involved in projects where Somerset Gas is appointed as Principal Contractor.

It applies to all subcontracted activities undertaken under Somerset Gas control, including but not limited to:

- heating installation and replacement;
- gas works;
- plumbing and mechanical services;
- plant room installation;
- enabling and preparatory works;

- associated construction and refurbishment activities.

This policy applies from subcontractor pre-appointment through to completion and handover.

3. Definitions

For the purposes of this policy:

Principal Contractor means the contractor appointed by the client to plan, manage, monitor, and coordinate the construction phase where more than one contractor is involved.

Subcontractor means any external contractor, specialist trade, labour-only worker, or supplier carrying out work under Somerset Gas control.

Construction Phase Plan means the plan setting out the health and safety arrangements and site rules for the construction phase.

RAMS means risk assessments and method statements.

Permit to Work means formal written authorisation required before certain higher-risk activities begin.

Competence means the appropriate skills, knowledge, training, experience, and organisational capability to carry out work safely.

Site Rules means the project-specific safety requirements that apply to the site.

4. Policy Statement

Somerset Gas will only engage subcontractors who are demonstrably competent, appropriately resourced, and able to comply with project-specific requirements, legal duties, and Somerset Gas standards.

Somerset Gas will ensure that subcontractor works are planned, sequenced, monitored, and supervised so that risks are reduced so far as is reasonably practicable.

Where Somerset Gas acts as Principal Contractor, it will discharge its duties under CDM 2015 by ensuring effective coordination, communication, supervision, and control of the construction phase.

5. Policy Principles

Somerset Gas will:

- carry out proportionate pre-appointment checks on subcontractors;

- ensure subcontractors are inducted before work starts;
- communicate relevant project information, risks, and site rules;
- coordinate subcontractor activities to avoid conflict and unmanaged risk;
- implement permit controls where required;
- monitor work through site inspections and supervision;
- address non-compliance promptly and effectively;
- maintain accurate records and document control.

6. Roles and Responsibilities

6.1 Managing Director

The Managing Director has overall responsibility for approving this policy and ensuring that adequate resources are provided for its implementation.

6.2 Contracts Manager / Project Manager

The Contracts Manager or Project Manager is responsible for ensuring that subcontractors are selected appropriately, that project planning is coordinated, and that subcontractor arrangements align with the construction phase plan.

6.3 Site Manager / Supervisor

The Site Manager or Supervisor is responsible for the day-to-day implementation of this policy, including inductions, supervision, site controls, permits, sequencing, and escalation of issues.

6.4 Health and Safety Lead / Advisor

The Health and Safety Lead provides advice on legal compliance, reviews health and safety documentation, supports inspections, and assists with investigations and corrective actions.

6.5 Subcontractors

Subcontractors are responsible for ensuring that their personnel are competent, that their work is properly planned and supervised, and that they comply with Somerset Gas requirements, site rules, and all applicable legislation.

7. Pre-Appointment Checks

Before appointing a subcontractor, Somerset Gas will complete suitable checks to confirm that the subcontractor is competent and suitable for the work.

These checks may include:

- company details and trading status;
- insurance cover, including public liability and employers' liability where applicable;
- relevant qualifications, accreditations, and trade memberships;
- evidence of experience and capability for the specific work;
- review of RAMS;
- confirmation of staffing levels and supervision arrangements;
- plant, equipment, and inspection records where relevant;

- references or previous performance information where appropriate.

No subcontractor may commence work until pre-appointment checks have been completed and approval has been granted.

8. Subcontractor Induction

All subcontractors must receive a site induction before starting work.

The induction will be proportionate to the project and will cover, as relevant:

- project overview;
- site hazards and control measures;
- welfare arrangements;
- emergency procedures;
- fire safety;
- first aid arrangements;
- access, traffic, and delivery arrangements;
- PPE requirements;
- site rules;
- permit-to-work requirements;
- interfaces with other trades and activities;
- reporting procedures for incidents, defects, and unsafe conditions.

Attendance at induction will be recorded and retained.

9. Coordination and Sequencing

Somerset Gas will plan and coordinate subcontractor work to ensure that activities are sequenced safely and that interfaces are properly managed.

The Site Manager or Project Manager will ensure that:

- subcontractor activities are built into the project programme;
- overlapping or conflicting work is avoided wherever possible;
- access and work areas are allocated safely;
- temporary services, isolations, and reinstatements are coordinated;
- changes to programme or sequence are assessed for safety impact;
- coordination meetings are held where necessary.

10. Control of Site Rules and Permits

Somerset Gas will establish and enforce site rules that are suitable for the nature and scale of the project.

Site rules may cover:

- site access and sign-in procedures;
- PPE requirements;
- housekeeping standards;
- working at height;
- hot works;
- electrical safety;
- lifting operations;
- asbestos awareness and control;
- traffic management;
- smoking and vaping restrictions;
- welfare and hygiene arrangements;
- protection of occupants, clients, and the public.

Where higher-risk or controlled activities are undertaken, Somerset Gas will operate a permit-to-work system. No such activity may begin until the relevant permit has been issued and all conditions are met.

11. Monitoring and Supervision

Somerset Gas will actively monitor subcontractor performance to confirm ongoing compliance with project requirements and legal duties.

Monitoring may include:

- Routine site inspections;
- review of RAMS compliance;
- observation of work practices;
- permit checks;
- toolbox talks and safety briefings;
- quality and housekeeping checks;
- review of incidents, near misses, and unsafe acts.

The level of supervision will reflect the complexity and risk profile of the work.

12. Interface with the Construction Phase Plan

Where Somerset Gas is acting as Principal Contractor, the construction phase plan will form the primary document for managing health and safety during the construction phase. Somerset Gas will ensure that subcontractors are informed of the relevant contents of the plan and comply with its requirements.

The plan will be reviewed and updated where:

- site conditions change;
- the sequence of work is altered;

- new risks are identified;
- additional subcontractors are introduced;
- incidents or non-compliance indicate that controls need improvement.

13. Non-Compliance and Escalation

If a subcontractor fails to comply with Somerset Gas requirements, site rules, RAMS, permit conditions, or lawful instructions, Somerset Gas will take appropriate action.

This may include:

- immediate verbal instruction to correct the issue;
- written warning or notice;
- suspension of the affected work;
- removal of personnel from site;
- requirement for revised RAMS or controls;
- escalation to senior management;
- termination of the subcontract;
- notification to the client or relevant authority where appropriate.

Serious, repeated, or wilful non-compliance will not be tolerated.

14. Records and Document Control

Somerset Gas will maintain records relating to subcontractor management, which may include:

- pre-appointment checks;
- competency and insurance evidence;
- approved RAMS;
- induction records;
- permits to work;
- inspection and audit findings;
- non-compliance notices and corrective actions;
- incident reports and investigation records;
- construction phase plan revisions.

All records will be managed in accordance with Somerset Gas document control procedures and retained for the required period.

15. Relevant CDM 2015 Duties

This policy supports Somerset Gas's duties under CDM 2015, including the Principal Contractor's duty to:

- plan, manage, monitor, and coordinate the construction phase;

- organise cooperation between contractors;
- ensure site inductions are provided;
- ensure site rules are prepared and followed;
- ensure welfare facilities are provided and maintained;
- take reasonable steps to prevent unauthorised access;
- liaise with the client and other dutyholders as required.

Somerset Gas will also ensure that subcontractors are given appropriate information, instruction, and supervision so that work is carried out safely and in compliance with the law. *Relevant duties arise under Construction (Design and Management) Regulations 2015, SI 2015/51.*

16. Compliance

Compliance with this policy is mandatory.

Any breach of this policy may result in disciplinary action, contract enforcement action, removal from site, or other corrective measures appropriate to the circumstances.

17. Review

This policy will be reviewed periodically and updated where necessary to reflect changes in legislation, company structure, project requirements, or operational learning.

Joe Lewis
Business Manager
May 03rd 2026



About this policy.

This policy is reviewed annually, in line with our responsibilities and commitments as a professional and safe company, contractor and employer.

If you have any questions or would like to provide feedback on this policy, please contact joe.lewis@somersetgas.co.uk