



LLOYD
HEALTH & SAFETY

PRACTICAL CONSTRUCTION GUIDE

CDM 2015: Key Duties to Remember

A clear, project-focused summary for clients, designers, principal designers, principal contractors, contractors and workers.

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CDM is about effective planning, capable appointments, coordinated design and controlled construction - not paperwork for its own sake.

This guide summarises the principal requirements of the Construction (Design and Management) Regulations 2015. It is not legal advice and should be read alongside the Regulations and HSE guidance.

How to use this guide

Use it at project start-up, during design reviews, at construction mobilisation and before handover.

The three questions to ask on every project

1. Who is in control of each phase? 2. Do they have the capability, time, information and resources?
3. Is risk information being acted upon and passed to the right people?

This guide covers

- The core purpose and scope of CDM 2015.
- The key duties of each named dutyholder.
- Written appointments, competence and notification.
- Pre-construction information, the construction phase plan and the health and safety file.
- A practical lifecycle checklist and common failure points.

Important boundaries

- CDM 2015 applies throughout Great Britain and to construction work from concept to completion.
- The duties are proportionate to the scale, complexity and risk of the project.
- A person or organisation may hold more than one role, but must be capable of discharging every duty clearly.
- This guide does not cover every requirement in Part 4 or Schedule 2, nor separate Building Regulations dutyholder regimes.

Contents

02	CDM 2015 at a glance	3
03	Commercial client duties	4
04	Principal designer duties	5
05	Designer duties	6
06	Principal contractor duties	7
07	Contractor duties	8
08	Worker duties	9
09	Key information and documents	10
10	Project lifecycle checklist	11
11	Appointments, notification and domestic clients	12
12	Common mistakes and duty matrix	13
13	Final action checklist and official sources	14

02

CDM 2015 at a glance

The Regulations place responsibility on those who create, commission, design, manage and carry out construction work.

The purpose

CDM 2015 integrates health and safety into normal project management. The intended outcome is that foreseeable risks are eliminated where possible, remaining risks are controlled, and the people doing the work receive usable information at the right time.

CLIENT	sets the brief, appointments, time and resources
PRINCIPAL DESIGNER	coordinates the pre-construction phase
DESIGNERS	eliminate, reduce and communicate design risks
PRINCIPAL CONTRACTOR	coordinates the construction phase
CONTRACTORS	plan and control their own work
WORKERS	work safely, cooperate and report risks

Applies to

- Commercial projects of every size.
- Domestic construction projects (with duties normally transferred).
- New build, refurbishment, alteration, fit-out, repair, maintenance that falls within the definition, and demolition.
- Design work that continues after site work begins.

Core behaviours

- Appoint early and in writing where required.
- Cooperate, communicate and coordinate.
- Provide sufficient time, people, money and information.
- Plan, monitor, review and adapt as the project changes.
- Consult workers and protect anyone affected, including the public.

Two common misunderstandings

Notifiability does not determine whether CDM applies. The duties apply whether or not an F10 is required.

More than one contractor does not mean simultaneously. If the project involves, or is likely to involve, more than one contractor during its life, written principal dutyholder appointments are required.

Main legal anchors: Regulations 4-8 (client, appointments, notification and capability), 9-15 (dutyholders), 16-35 (construction site requirements) and Schedules 2-4.

03

Commercial client duties

Clients have the greatest influence over the project because they control the brief, appointments, programme and resources.

CLIENT

Commercial client

Who: The person or organisation for whom the construction project is carried out as part of a business.

Legal headline: Make and maintain suitable arrangements for managing the project so it can be carried out without risks to health or safety.

Key duties

- Set suitable management arrangements that are proportionate to the project, and review them throughout.
- Allow sufficient time and resources for design, planning, construction and handover.
- Appoint capable designers and contractors. Where more than one contractor is involved or likely, appoint the principal designer and principal contractor in writing.
- Provide relevant pre-construction information to designers and contractors who are bidding or appointed.
- Ensure a construction phase plan exists before construction begins.
- Ensure suitable welfare arrangements are in place for the duration of the work.
- Ensure the principal dutyholders perform their functions; appointment does not remove the client duty to check arrangements.
- Ensure the health and safety file is prepared, kept available and passed on where the project involves more than one contractor.
- Notify HSE and display the F10 where the project meets the notification threshold.

Good evidence

- Clear written appointments and scope.
- Competence/capability checks linked to project risk.
- Realistic programme and mobilisation period.
- PCI schedule and information gap tracker.
- Recorded reviews of PD and PC performance.
- Client decisions and changes communicated promptly.

Watch-outs

- Selecting solely on lowest price.
- Appointing the PD after design is substantially complete.
- Assuming the PC owns every project risk.
- Allowing site work to start while surveys, welfare or the CPP are incomplete.
- Treating a signed appointment as proof that duties are being carried out.

Client test

Could you demonstrate why the team, time, budget, information and arrangements are sufficient for the actual project risks - not merely that appointments and contracts exist?

Relevant regulations: 4, 5, 6, 8 and 12.

04

Principal designer duties

The principal designer leads health and safety coordination during the pre-construction phase and while design work continues.

PD

Principal designer

Who: A designer appointed in writing by the client, with control over the pre-construction phase on a project involving, or likely to involve, more than one contractor.

Legal headline: Plan, manage, monitor and coordinate health and safety in the pre-construction phase.

Key duties

- Plan and manage the pre-construction phase, including how design risk management, reviews and interfaces will be controlled.
- Help the client assemble, assess and distribute pre-construction information, identifying gaps that need to be closed.
- Ensure designers comply with their duties and apply the general principles of prevention.
- Coordinate designers and design packages so interfaces, sequencing and changes do not create unmanaged risk.
- Eliminate foreseeable risks where possible; where not possible, ensure they are reduced, controlled and clearly communicated.
- Liaise with the principal contractor so buildability, methods, temporary works, logistics and residual risks inform design decisions.
- Prepare, develop and hand over the health and safety file, or ensure arrangements continue if the appointment ends before completion.
- Remain effective while design continues during construction, including design changes, specialist design and temporary works design interfaces.

Good evidence

- A project-specific PD plan or coordination strategy.
- Design responsibility matrix and design programme.
- Design risk review minutes with decisions and owners.
- PCI register and information-gap actions.
- Design change and residual-risk communication process.
- Planned H&S; file structure from an early stage.

Watch-outs

- A “CDM adviser” with no control of design is not automatically the PD.
- A design risk register alone does not discharge the duty.
- Generic hazard notes can obscure the significant residual risks.
- Ending the PD role too early while design is still changing.
- Failing to involve the PC and specialist contractors early enough.

Principal designer test

Can the PD show how design risks and interfaces were actively managed, challenged and communicated - including changes made after construction started?

Relevant regulations: 5, 8, 11 and 12.

05

Designer duties

Anyone who prepares, modifies, specifies or instructs design may be a designer under CDM - including clients and contractors.

D

Designer

Who: An organisation or individual whose business involves preparing or modifying construction designs, or arranging for or instructing others to do so.

Legal headline: When preparing or modifying a design, eliminate foreseeable risks so far as reasonably practicable, then reduce or control what remains.

Key duties

- Do not start design work until satisfied the client understands the client duties.
- Use the pre-construction information and seek missing information needed to design safely.
- Consider the full lifecycle: construction, commissioning, use as a workplace, cleaning, maintenance, alteration and demolition.
- Eliminate risk through design where reasonably practicable; then reduce or control remaining risk.
- Apply collective protection before individual protection and consider safer methods, materials, access and sequencing.
- Provide clear information about significant residual risks that competent contractors would not readily identify.
- Cooperate and coordinate with the PD, other designers and contractors, including specialist and temporary works designers.
- Review design changes so late modifications do not introduce unmanaged construction or maintenance risks.

Examples of design risk reduction

- Design permanent edge protection or safe fixing points.
- Reduce heavy lifts through modularisation or component sizing.
- Provide safe access and isolation for future maintenance.
- Avoid hazardous materials or specify safer alternatives.
- Coordinate underground services and excavation interfaces.
- Design for temporary stability and foreseeable construction stages.

Information should be

- Specific to the design and risk.
- Proportionate and concise.
- Shown on drawings/specifications where it is most useful.
- Clear about assumptions, sequencing and constraints.
- Passed early enough to influence planning and pricing.
- Updated when the design changes.

Designer test

What did the design team change to remove or reduce risk, and what unusual or significant residual risks must the builder, user or maintainer understand?

Relevant regulations: 8 and 9.

06

Principal contractor duties

The principal contractor leads the construction phase and coordinates the contractors working within it.

PC

Principal contractor

Who: The contractor appointed in writing by the client to control the construction phase on a project involving, or likely to involve, more than one contractor.

Legal headline: Plan, manage, monitor and coordinate the construction phase so far as reasonably practicable without risks to health or safety.

Key duties

- Prepare the written construction phase plan before construction starts, implement it, and keep it proportionate and current.
- Plan, manage, monitor and coordinate the entire construction phase, including interfaces between contractors and the public.
- Organise cooperation and coordination, and ensure contractors follow applicable legal requirements and relevant parts of the CPP.
- Provide suitable site induction, information, instruction and supervision and confirm those appointed are capable.
- Provide and maintain welfare facilities from the start of the construction phase.
- Prevent unauthorised access and control site security and public interfaces.
- Consult and engage workers on health, safety and welfare matters.
- Liaise with the client and PD, sharing information about construction methods, design changes, temporary works and residual risks.
- Manage general site requirements, including stability, traffic routes, excavations, fire, emergencies, housekeeping and work at height.

Good evidence

- Live CPP with review dates and change control.
- Mobilisation readiness review before site start.
- Contractor onboarding and capability checks.
- RAMS review linked to site interfaces and sequence.
- Inspection, assurance and close-out arrangements.
- Worker consultation records and learning actions.

Watch-outs

- A generic CPP copied from another project.
- Managing paperwork but not physical conditions or behaviours.
- Accepting contractor RAMS without checking coordination and interfaces.
- Welfare provided late or not maintained.
- Uncontrolled design changes or temporary works.
- Induction treated as the end of communication.

Principal contractor test

Do site conditions, supervision, coordination and monitoring match the CPP and the changing risk profile of the works?

Relevant regulations: 8, 12, 13, 14 and Part 4.

07

Contractor duties

Every contractor - including subcontractors and self-employed businesses - must plan and control the work under their control.

CTR

Contractor

Who: Anyone who carries out, manages or controls construction work, including subcontractors and self-employed contractors.

Legal headline: Plan, manage and monitor construction work under their control so it is carried out without risks to health or safety so far as reasonably practicable.

Key duties

- Before starting, ensure the client is aware of the client duties.
- Plan, manage and monitor the work, considering workers, other contractors, occupants, neighbours and the public.
- Use capable workers with the necessary skills, knowledge, training and experience, or provide effective training and supervision.
- Provide suitable information, instruction and supervision for the task and the actual site conditions.
- Coordinate with others and comply with directions from the PD or PC and relevant requirements of the CPP.
- Do not begin unless unauthorised access is controlled and suitable welfare is available.
- For a single-contractor project, ensure a CPP is prepared before site setup.
- Review methods when conditions, design, sequence, people or plant change; stop and escalate where work cannot proceed safely.
- Provide information for the H&S; file and report design, installation or as-built changes.

Before work starts

- Understand the scope, drawings and PCI.
- Survey the work area and interfaces.
- Prepare suitable risk controls and method.
- Confirm plant, competence, permits and rescue needs.
- Brief workers and coordinate with affected parties.

During the work

- Supervise and check controls are effective.
- Maintain exclusion zones, access and housekeeping.
- Report changes and unforeseen conditions.
- Record inspections and corrective actions.
- Provide accurate as-built and handover information.

Contractor test

Can the contractor show that the safe system reflects today's work area, people, sequence, interfaces and conditions - rather than only the tender assumptions?

Relevant regulations: 8 and 15, plus applicable Part 4 requirements.

08

Worker duties

Workers are not passive recipients of rules: they must cooperate, follow controls and report risk.

W

Construction worker

Who: Anyone working for or under the control of a contractor on a construction site, including supervisors and trades.

Legal headline: Only undertake work when capable or properly supervised, follow site controls, cooperate and report risks.

Key duties and expectations

- Only carry out work when you have the necessary skills, knowledge, training and experience - or the training and supervision needed to work safely.
- Understand the hazards and controls for the site and task before starting.
- Follow site rules, permits, RAMS and reasonable instructions.
- Use equipment and protective measures correctly and do not defeat or bypass safeguards.
- Cooperate with the contractor, principal contractor and other dutyholders.
- Report unsafe conditions, changes, defects, near misses and risks to whoever controls the work.
- Take reasonable care of your own health and safety and that of others who may be affected by your acts or omissions.
- Use stop-work authority where controls are missing, conditions have changed or the work is not understood.

STOP	Stop the activity if there is immediate danger, a critical control is absent, or the method no longer matches the conditions.
MAKE SAFE	Prevent exposure where it is safe to do so: isolate, withdraw, secure the area and warn others.
REPORT	Tell the supervisor or person in control, explain what changed and do not restart until the risk is assessed and controls are agreed.

Workers should be consulted on

- Work methods and sequencing.
- Access, welfare and site rules.
- Changes that affect their health or safety.
- Lessons from incidents and near misses.
- Practical improvements to controls.

Supervisors should check

- The team understands the work and controls.
- New or young workers receive suitable support.
- Language, literacy and communication needs.
- Fatigue, weather and environmental factors.
- Concerns are acted upon without blame.

Relevant regulations: 8 and 14, supported by wider employer and employee duties under health and safety law.

09

Key information and documents

Documents should support decisions and control - not become disconnected administrative outputs.

Item	Who leads	When	What good looks like
Written PD and PC appointments	Client	As early as practicable; PC before construction starts	Clear role, authority, scope, duration and interfaces; appointees are capable.
Pre-construction information (PCI)	Client, assisted by PD	Tender/design stage and updated as information emerges	Relevant, proportionate and usable: existing drawings, surveys, asbestos, services, ground, constraints, operations and prior H&S; file.
Construction phase plan (CPP)	PC; contractor on a single-contractor project	Before construction begins; reviewed throughout	Project arrangements, site rules and controls for significant and Schedule 3 risks; reflects actual sequence and interfaces.
Design risk information	Designers coordinated by PD	During design and whenever it changes	Shows decisions, assumptions and significant residual risks in the most useful location - drawing, model, specification or brief note.
RAMS / safe systems	Contractor, coordinated by PC	Before relevant work; reviewed when conditions change	Task- and site-specific, understood by the workforce, coordinated with adjacent work, permits and emergency arrangements.
Health and safety file	PD; PC may complete if PD appointment ends	Developed during project and handed to client at completion	Concise information needed for future construction work: residual hazards, structure, hazardous materials, services and safe access/maintenance.
F10 notification	Client (or someone on their behalf)	As soon as practicable before construction starts	Accurate and updated when material particulars change; copy displayed in the site office.

The information-flow rule

Give people the information they need, in a form they can understand, early enough to influence design, planning, price, method and sequence. Remove irrelevant volume and avoid simply transferring document dumps.

10

Project lifecycle checklist

Use the following hold points to test whether the project is ready to move forward.

A

Concept and brief

- Identify the client and whether the work is a CDM project.
- Define scope, constraints, intended use and key interfaces.
- Allocate realistic time and resources.
- Identify likely contractor count and principal dutyholder needs.
- Begin collecting existing H&S; information and surveys.

B

Procurement and pre-construction

- Make written PD and PC appointments where required.
- Assess skills, knowledge, experience and organisational capability.
- Issue PCI and track missing information.
- Coordinate design risk reviews and buildability input.
- Set information, assurance and H&S; file requirements.

C

Before construction starts

- Confirm the CPP is suitable and project-specific.
- Verify welfare, security, emergency and logistics arrangements.
- Confirm surveys, permits, temporary works and key RAMS.
- Complete mobilisation readiness review.
- Submit/display F10 where notifiable.

D

Construction and change

- Monitor site conditions, supervision and contractor coordination.
- Consult workers and act on observations and near misses.
- Control design changes, temporary works and as-built information.
- Review CPP and methods as work and risk change.
- Maintain welfare, public protection and emergency readiness.

E

Commissioning and handover

- Plan safe energisation, testing, commissioning and access.
- Close defects and temporary arrangements.
- Verify as-built, O&M; and residual risk information.
- Complete and hand over the H&S; file.
- Record lessons learned and arrangements for future work.

Hold-point principle

Do not let contractual pressure, a planned start date or incomplete information normalise an unsafe start. Escalate unresolved critical risks and record who has authority to release each hold point.

11

Appointments, notification and domestic clients

These rules are frequently misunderstood and should be settled at the very start.

Written appointments

- **Required:** Where a project involves, or is likely to involve, more than one contractor, the client must appoint a PD and PC in writing.
- **Timing:** Appoint the PD as early as practicable in design; appoint the PC early enough to contribute and always before construction starts.
- **No appointment:** If the client fails to appoint, the client must fulfil the relevant principal dutyholder duties.
- **Multiple roles:** One organisation may hold more than one role if capable, but authority, resources and role boundaries must be clear.

Capability and appointments

- Anyone appointing a designer or contractor must take reasonable steps to ensure they have the necessary skills, knowledge, experience and, for an organisation, organisational capability.
- The test must be proportionate to the project risk and role - not just possession of a card, certificate or generic accreditation.
- Designers and contractors must not accept an appointment unless capable, and must use capable people under their control.
- Check resource, leadership, systems, relevant experience, workforce capability and ability to coordinate.

F10 NOTIFICATION THRESHOLD

Notify if the construction work is expected to:

- last longer than 30 working days and have more than 20 workers working simultaneously at any point; or
- exceed 500 person-days of construction work.

Remember

The client is responsible for notification, although another person may submit it on the client's behalf. Every day on which construction work is likely to occur counts, including weekends and holidays. The F10 threshold does not decide whether CDM applies.

Domestic clients

Project arrangement	Who normally takes the domestic client duties
Single contractor	The contractor, in addition to their contractor duties.
More than one contractor	The principal contractor, in addition to their PC duties. If not appointed, the contractor in control carries the relevant duties.
Written agreement with PD	The domestic client may agree in writing for the principal designer to carry out the client duties.

12

Common mistakes and duty matrix

A quick challenge tool for project reviews and governance meetings.

Frequent failure points

- Late or unclear PD/PC appointments.
- Capability checks based only on generic accreditation.
- PCI issued as a large, unfiltered document dump.
- PD lacks authority or control over design coordination.
- Significant design changes bypass the PD and PC.
- CPP and RAMS are generic, static or prepared after work begins.
- Temporary works and specialist design interfaces are unclear.
- Worker consultation is replaced by one-way briefings.
- Client does not monitor whether the PD and PC are performing.
- H&S; file assembled at the end without early planning.

Questions that expose weak arrangements

- Who can stop or change the project when critical information is missing?
- Where are design assumptions and residual risks recorded?
- How are subcontractor designs and temporary works coordinated?
- What changed this week, and which documents/control measures were reviewed?
- How is the client assured that the PD and PC are effective?
- What information will a future maintainer genuinely need?
- What are workers telling us that the paperwork does not show?

Duty matrix - who leads what?

Activity	Client	PD	Designer	PC	Contractor	Worker
Allocate sufficient time/resources	Lead	Advise	Input	Input	Input	-
Appoint PD and PC in writing	Lead	-	-	-	-	-
Provide / develop PCI	Lead	Coordinate	Input	Input	Input	-
Eliminate/reduce design risk	Assure	Coordinate	Lead	Input	Input	-
Prepare CPP	Ensure	Input	Input	Lead*	Lead*	-
Coordinate construction phase	Assure	Liaise	Liaise	Lead	Cooperate	Cooperate
Induction, welfare, site access	Ensure	-	-	Lead	Support	Follow
Consult workers	Assure	-	-	Lead	Consult	Participate
Prepare H&S; file	Ensure	Lead	Input	Complete**	Input	-
Notify HSE where required	Lead	Support	-	Support	-	-

* PC leads for multi-contractor projects; the contractor leads on a single-contractor project. ** The PC may complete and hand over the file where the PD appointment ends before project completion.

13

Final action checklist and official sources

A one-page review before design freeze, mobilisation or project governance approval.

Before approving the next stage, confirm:

- ☐ The client, PD, designers, PC and contractors are correctly identified and their scopes are understood.
- ☐ Written PD and PC appointments are in place where the project involves or is likely to involve more than one contractor.
- ☐ Capability checks are proportionate to the project and include adequate people, systems, leadership and resources.
- ☐ The programme allows sufficient time for surveys, design coordination, procurement, mobilisation and high-risk activities.
- ☐ PCI is relevant, usable and issued early; missing information has owners and dates.
- ☐ Design risks have been eliminated or reduced and significant residual risks are communicated clearly.
- ☐ The CPP is completed before construction starts and reflects the actual project, interfaces and emergency arrangements.
- ☐ Welfare, security, access, public protection and worker consultation are effective from the start.
- ☐ Design changes, temporary works, commissioning and energisation have clear controls and approvals.
- ☐ The H&S; file is planned early, developed during the project and contains useful information for future work.
- ☐ The F10 threshold has been checked, and any notification is accurate, displayed and updated.
- ☐ There is a clear assurance process to monitor whether arrangements are working in practice.

Practical standard

Good CDM management is visible in project decisions, design changes, site conditions, worker understanding and usable handover information. A complete document set is not enough if the arrangements are ineffective.

Official sources used

The Construction (Design and Management) Regulations 2015 (SI 2015/51)

<https://www.legislation.gov.uk/ukxi/2015/51/contents>

HSE L153 - Managing health and safety in construction

<https://www.hse.gov.uk/pubns/priced/l153.pdf>

HSE - CDM 2015 overview and dutyholder guidance

<https://www.hse.gov.uk/construction/cdm/2015/index.htm>

HSE - Summary of duties under CDM 2015

<https://www.hse.gov.uk/construction/cdm/2015/summary.htm>

HSE - CDM 2015 frequently asked questions

<https://www.hse.gov.uk/construction/cdm/faq/>

HSE - How to notify a project (F10)

<https://www.hse.gov.uk/construction/cdm/2015/f10form.htm>

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