

Site Safety Enhancement

Purpose

In recommendation No. 88(e) of its report, the Construction Industry Review Committee recommended that the requirements for the Site Supervision Plan System (SSPS) under the Buildings Ordinance (BO) and the Safety Management System (SMS) under the Factories and Industrial Undertakings (Safety Management) Regulation (SMR) be co-ordinated to facilitate the compliance efforts of the construction industry. This practice note promulgates measures to enhance co-ordination of the two systems.

Site Supervision Plan System

2. The BO is concerned primarily with the safety and stability of buildings, building works and streets works, to ensure that the safety of the occupants and the public, all persons within and around the construction sites and any adjoining buildings, structures and land would not be adversely affected. The SSPS established under section 39A of the BO has been implemented since 1997. Under the SSPS, the site supervision requirements for any building works or street works are based on the type of works and the scale of the works involved. The Authorized Person (AP), Registered Structural Engineer (RSE), Registered Geotechnical Engineer (RGE) and Registered Contractor (RC) appointed for the works are each required to engage a team of Technically Competent Persons (TCPs) to supervise the carrying out of the building works or street works to ensure that building operations are carried out in a safe manner so as to mitigate the risk to all persons within and around the construction site, and to adjoining buildings, structures and land.

Safety Management System

3. On the other hand, the Factories and Industrial Undertakings Ordinance and its subsidiary legislation deal mainly with the safety and health of workers at work. Under the SMR, a contractor is required to develop, implement and maintain a SMS, which aims at safeguarding workers' safety and controlling risk of injury arising from work activities. The SMR comes into operation in stages. During the initial stage starting from 1 April 2002, a contractor with a contract value of \$100 million or more, or having an aggregate of 100 or more workers in a day working on one or more construction sites, is required to implement in his SMS the 8 elements in Part 1 and the 2 elements in Part 2 of Schedule 4 of the SMR and to ensure the carrying out of a safety audit in every 6 months. At the same time, a contractor having an aggregate of 50 or more but less than 100 workers in a day working on a single construction site, or working in 2 or more construction sites, is required to implement in his SMS the 8 elements in Part 1 of Schedule 4 of the SMR and to ensure the carrying out of a safety review in every 6 months. For all contractors, the 4 elements in Part 3 of the same Schedule have not come into operation yet.

/Relationship

Relationship between the Two Systems

4. The duty holders under the two systems are mostly different. The AP, RSE, RGE, RC and their TCPs are duty holders under the SSPS, whereas, the principal contractor, sub-contractors and sub-sub-contractors are duty holders under the SMS. There is, however, a common duty holder, the main contractor, who is the RC under the SSPS and the principal contractor under the SMS. It is considered that the Authorized Signatory (AS) of the RC may play a more proactive co-ordinating role in the implementation of the two systems.

Enhancement Measures for Co-ordination of SSPS and SMS

5. RCs are advised to co-ordinate the requirements of the SSPS and the SMS by taking the following measures:

- (a) The RC should include his AS, the AS's Representative (RAS) and some of his TCPs under the SSPS in the safety committees of the SMS to improve inter-system communication. The AS and RAS may chair the safety committees at corporate level and site level respectively.
- (b) In the development and implementation of the element of "programme of inspection" under the SMS, the RC should consider giving priority to the high-risk construction processes and critical stages of works under the SSPS.
- (c) While preparing method statements, the AS should also take into account the requirements of the element of "evaluation of job related hazards and development of safety procedures" under the SMS when this element comes into effect, in addition to the requirements and construction sequence specified in the approved plans under the SSPS. He may seek advice from his TCPs, registered safety auditors and registered safety officers in this regard.
- (d) The RC should include the "critical stages of works" under the SSPS in the programme for the element of "evaluation of job related hazards and development of safety procedures" under the SMS when this element comes into effect, to facilitate compliance with both systems.
- (e) The AS, RAS and TCP T1 to T3 of the RC under the SSPS should attend safety training courses to improve their safety competency and ability in managing site safety.
- (f) Safety officers and safety supervisors under the SMS should attend technical training on building construction so as to facilitate inter-stream and inter-system communication, co-ordination and harmonization. In this respect, the Construction Industry Training Authority, the Institutes of Vocational Education and the various professional bodies have been providing relevant training courses and seminars from time to time.

- (g) Registered safety auditors and safety review officers should make reference to the approved plans and the associated supervision plan under the SSPS in their safety audits or safety reviews for assessing the effectiveness of the SMS.

Implementation of Enhancement Measures

6. The above enhancement measures are intended to improve the safety standard of the construction industry. The Buildings Department and Labour Department strongly recommend all contractors to implement these measures with immediate effect.

(H W CHEUNG)
Building Authority

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