

ACEI Covid-19 Advice Note on Site Inspections

1. Introduction

This Advice Note has been prepared by the Association of Consulting Engineers of Ireland (ACEI). Its purpose is to highlight some key issues that member firms should consider in relation to construction site health and safety (H&S) risks during the current Covid-19 crisis. The note is mainly relevant to site inspections and monitoring activities for building and infrastructure projects, however due consideration should also be given to returning to the office as a workplace.

This Advice Note is relevant at the point in time at which it is published. Members must bear in mind that the issues around Covid-19 are evolving very rapidly, and they must keep abreast of the latest advice from the Health Service Executive (HSE), the Health and Safety Authority (HSA), the Construction Industry Federation (CIF) and other relevant bodies.

Covid-19 is a staff welfare and health and safety issue, and all actions arising must be guided by the principle that no employee's health or safety should be at risk for any reason. This is critically important in the context of site monitoring and inspection duties for essential construction projects, particularly in anticipation of some government restrictions being relaxed across the sector in the short to medium term.

Members will appreciate that it is not possible to give specific advice in relation to individual situations or circumstances. This Advice Note will focus on key items to be considered so that members can exercise reasonable skill, care and diligence in the performance of their services, as required by their client contracts, the 2014 Building Control (Amendment) Regulations (BC(A)R) and the Code of Practice for Inspecting and Certifying Buildings and Works (CoP).

At all times, member firms should consult with, and abide by, all HSE and Government advice in relation to Covid-19 restrictions, and seek where appropriate, professional advice in relation to H&S matters. Some useful links and references are provided throughout this note that can be accessed by clicking on the relevant images below or on the [ACEI Website](#).

2. Health and Safety Authority Advice

In accordance with the Safety Health and Welfare at Work Act 2005, and the Safety Health and Welfare at Work (General Application) Regulations 2007, the HSA has advised that employers are required to ensure, so far as is reasonably practicable, that an appropriate assessment of the risk for Covid-19 in the workplace is carried out, and that suitable control measures are identified and implemented to mitigate the risk of infection. This applies to both office environments, and construction sites which member firms are required to visit for purposes of inspection and monitoring of works.

3. Health & Safety on Construction Sites

While all parties involved in a construction project have H&S responsibilities, the responsibility for safety on construction sites, including Covid-19 management of the site, lies with the Project Supervisor for Construction Stage (PSCS) and the Contractor. Procedures for site management should be communicated by these parties in writing to consultants before any site visits are undertaken, and the consultant should request and review these in advance of site visits.

The role of the PSCS is to manage and co-ordinate health and safety matters during the construction stage and to develop a suitable construction stage safety and health plan for the project. It is the duty of the PSCS to update the plan and ensure that relevant information is available to anybody associated with the project that may need it. This is now critically important in the context of Covid -19 management of construction sites.

The Contractor has significant H&S duties relating to a wide range of issues. The contractor must co-operate with the PSCS and take direction from the project supervisors in response to Covid-19 site management. In this context, the contractor must ensure that site rules and safety and health requirements are complied with on site.

To assist contractors, and the industry in general, the CIF has developed Construction Sector C-19 Pandemic Standard Operating Procedures. This document intends to introduce standardisation on sites of all sizes in line with the Government's and the HSE recommendations on the management of Covid-19. It is likely that this will become a standard requirement for all professionals attending sites for the purposes of site inspections and site monitoring. The CIF has advised that every project should devise a plan, by considering its guidance, for implementation on site in consultation with all affected parties.

ACEI members are advised to refer to this document and co-operate with the Covid-19 compliance officer for the site. As part of site procedures, all persons attending the site, including visitors, are required to undertake an online C19 induction and complete a Questionnaire/Self Declaration before attending sites.



4. Health & Safety Site Risk Assessments

It is important that Site Risk Assessments in relation to site inspection by their staff are undertaken by consultants and documented. In addition to the normal risks associated with construction sites, records should be kept of decisions and any specific actions taken to mitigate Covid-19 risks for employees where site inspection and monitoring is essential.

Senior management with responsibility for H&S should evaluate all risk assessments and site inspection procedures, to ensure that as far as is reasonably practicable, appropriate controls and mitigations are in place to safely allow engineering staff attend site for inspections and monitoring.

These are likely to include some or all of the following (non-exhaustive) considerations:

- Follow all HSE and government advice concerning physical distancing during travel to and from the site and while in attendance.
- Request a Covid-19 site-specific management procedure from the PSCS and contractor.
- Adhere to site rules and undertake site inductions as required. These may include site access, protocols for physical distancing, hygiene, hand washing and other sanitation procedures.
- Undertake personnel risk assessments when selecting suitable staff to conduct site monitoring activities.
- Adhere to requests to use any additional Personal Protective Equipment (PPE) as required by employers or sites.
- Travel to and attend site alone to conduct inspections.
- Avoid any face to face meetings on site. Minimise the number of people interacted with, minimise the duration of interactions and maximise physical distancing.
- Attend site at contractor break times or outside working hours.



It is the ACEI's advice that if an employee of a member firm has any concerns over physical distancing or implementation of any Covid-19 site procedures in advance of a site visit or while attending site to undertake a site inspection, **the employee should be advised not to visit or carry out the inspection or alternatively to leave the site.** The matter should be raised with the project PSCS and the employee's Director/Manager with responsibility for H&S.

5. Designer / Assigned/ Ancillary Certifier – Site Monitoring for BC(A)R Certification

5.1 ACEI members act in both the role of Designers and Assigned Certifiers (AC) on many building and infrastructure projects where BC(A)R applies. There are no relaxations currently in place in the terms of the statutory duties of either Designers, Ancillary or Assigned Certifiers to carry out inspections. ACEI members should therefore liaise with the AC to agree, taking into account the duties of the parties as defined in the CoP, the requirements for site inspections to comply with the Inspection Plan. The following extracts from the CoP are relevant.

Designers / Ancillary Certifiers Role

- *as agreed with the Assigned Certifier, carry out work inspections which are pertinent to their elements of the Design, and liaise with the Assigned Certifier in terms of this and the required ancillary certification;*
- *notify the Assigned Certifier of their proposed inspection regime for inclusion in the overall Inspection Plan;*

Assigned Certifiers Role

- *in consultation with the members of the design team, plan and oversee the implementation of the Inspection Plan during Construction;*
- *prepare the Preliminary Inspection Plan and oversee adherence to this plan, and on completion provide the Inspection Plan as implemented;*

5.2 The ACEI is aware of a recent development advocating the use of photographic and video evidence from third parties to replace site inspections. The ACEI advises caution in relation to this practice which is unlikely to be suitable in all circumstances. Members should be mindful of section 7.6 of the CoP which notes that:

Records of each inspection should be maintained by the person and firm responsible and should be sufficient to identify the work inspected and any non-compliance.

In considering the above, consultants are advised to refresh themselves with the specific wording of the Ancillary Certificate of Completion which requires the Designer to confirm that:

- *....we prepared a Preliminary Inspection Plan which we gave to the Assigned Certifier for inclusion in the overall Preliminary Inspection Plan.*
- *....our Inspection Plan has been undertaken by us.*

The ACEI has consulted with the Department of Housing, Planning and Local Government (DHPLG) concerning site inspections during the current Covid-19 crisis. The DHPLG has advised that Ancillary Designers and Assigned Certifiers may continue to undertake normal, regular on-site inspections where this can be done safely and in line with Public Health guidance. The use of alternative methods of checking compliance to supplement physical inspections, (for example, using digital photographs and video or other remote means of checking compliance), is not prohibited. However, Ancillary Designers and Assigned Certifiers should satisfy themselves, within the limits of their professional skill and care, that these remote inspections are used appropriately. Remote inspections should not normally be used as the sole method of assessing compliance.

The ACEI advises that BC(A)R Certification cannot be given unless the Designer/AC carries out the inspections in accordance with the agreed Preliminary Inspection Plan. Therefore, the conducting of Site Risk Assessments in relation to site inspections by member firms to ensure, so far as is reasonably practicable, that employees can conduct site inspections and monitoring safely during Covid-19 restrictions, will be critical for BC(A)R certification of works.