

34 4Cs System - Management of Visiting Workers / Contractors

This chapter is split into two parts:

Part 1: Directive. This part provides direction that you **must** follow to help you comply with (keep to) health and safety law, Government policy and Defence policy.

Part 2: Guidance. This part provides the guidance and good practice that **should** be followed and will help you to keep to this policy.

Contents

Title	Page
Amendment record	2
Terms and definitions	2
Scope	4
Assurance	4
Alternative acceptable means of compliance	5
Part 1: Directive	
Introduction	6
Key health and safety legislation	6
Policy Statements	7
Part 2: Guidance	
Management arrangements	14
Key personnel guidance	16
Retention of records	19
Related documents	19

[Annex A – Recommended Competence Requirements](#)

[Annex B – 4Cs Example System Area Hazard Register & Hazard Class List](#)

[Annex C – The 4Cs System – A Guide to Visiting Contractors](#)

[Annex D – Chapter 34 – Assurance Checklist](#)

Amendment record

This chapter has been reviewed by the Directorate of Defence Safety (DDS) together with relevant subject matter experts and key safety stakeholders. Any suggestions for amendments **should** in the first instance be directed to the Defence organisation's [Safety Centre/Team Group Mailbox](#) and with their approval, sent to People-DDS-GroupMailbox@mod.gov.uk.

Version No	Date of publishing	Text Affected	Authority
1.2	Oct 20	Interim update post-handover of Policy from DSA to D HS&EP.	D HS&EP
1.3	29 Aug 25	Release of two-part chapter structure. Revised terminology.	DDS

Terms and definitions

The following table sets out definitions of some of the key terms used in this chapter. The most current general safety terms and definitions are provided in the [Master Glossary of Safety Terms and Definitions](#) which can also be accessed on [GOV.UK](#).

4Cs	Co-ordination, co-operation, communication, and control.
4Cs Appointed Person (4CsAP)	A person with the appropriate management attributes, competence and authority, who has been formally appointed by the accountable person for their unit, to oversee the process for the management of visiting workers and contractors.
Accountable Person	The person whose terms of reference state that they are responsible for making sure there are suitable and sufficient systems in place to control health and safety risks in their unit, establishment, site or platform. This term is used in place of CO, HoE, OC, Station Commander and so on, or as decreed by the Defence Organisations.
Area Custodian	A person of suitable rank or grade, with appropriate knowledge and experience, appointed by their line manager (in consultation with the 4Cs Appointed Person) to compile a hazard register(s) for their 4Cs Area(s) of responsibility and to communicate and co-ordinate on health and safety matters with any visiting workers / contractors, prior to work commencing. On some sites, this could be subsumed as part of another role.

Commander	This is generally a military person responsible for planning activities, supervising activities, and making sure that personnel under their area of responsibility are safe. This term refers to a role rather than the rank of Commander, and it can be a permanent or temporary role (for example, lasting for the duration of a training exercise). In parts of Defence this person could be referred to as a 'responsible person.'
Competent person	"The combination of training, skills, experience, and knowledge that a person has and their ability to apply them to perform a task safely. Other factors, such as attitude and physical ability, can also affect someone's competence". (See www.hse.gov.uk/competence/what-is-competence.htm for information on competence.)
Contractor	A person not directly employed by Defence or a company that is contracted to provide a service or perform a task / activity for Defence. Contractors could be 'permanent' (Maintenance Management Organisation (MMO) managers, Mess employees and so on); 'regular' (MMO workers, couriers, and so on); or 'irregular' (telecoms engineers, contractors locally employed for a specific task and so on).
Host	The Host is the sponsor of a specific event or work activity, with specified responsibilities, and is also responsible for providing the visitors, visiting workers / contractors with suitable and sufficient information and instruction to safely carry out their activities.
Manager	A person responsible for planning activities, supervising activities and making sure that personnel under their area of responsibility are safe. This could be a permanent or temporary role, and in parts of Defence this person could be referred to as a 'line manager,' a 'responsible person' or a 'delivery manager.'
Maintenance Management Organisation (MMO)	An organisation which manages the upkeep and optimal functioning of the physical assets, facilities, and infrastructure of a Defence unit, establishment or site.
Visiting Worker	Those employed by Defence (military or civilian) who are visiting a Defence establishment different to their 'home base / permanent duty station' or a different and unfamiliar part of their 'home base' for work. For example, visiting another location for a meeting or training or a site-based electrician working at a remote building and so on.
Visitor	Non-workers who may visit the Defence establishment which may include members of the public for open days, mess events, graduations and so on; volunteers for example assisting in a site museum, or taking part in conservation activities and so on; emergency services; or regulatory bodies for example Health and Safety Executive or Environment Agency and so on.

Must and should

Where this chapter says **must**, this means that the action is a compulsory requirement.

Where this chapter says **should**, this means that the action is not a compulsory requirement but is considered good practice.

Scope

The policy contained within this chapter:

- a. applies to all those employed by Defence (military and civilian) including reservists and those under the age of 18 (for example recruits and apprentices).
- b. applies to those working on behalf of, or under the supervision of Defence (for example, contractors or visitors).
- c. applies to all Defence activities carried out in any location (UK or overseas).
- d. is not written for young persons in the cadet forces¹, Defence-run schools, nurseries and so on; those organisations **must** maintain their own safety policies and governance and **must** provide statutory compliant infrastructure and appropriate safe systems of work. They may use material from this chapter as a reference point, but where appropriate their respective policies **should** be adapted to meet the needs of young persons and to follow any applicable Department for Education guidelines or legislation.

Assurance

The application of the policy contained within this Chapter **must** be assured (that is, its use **must** be guaranteed). As part of their overall assurance activity, the commander, manager, or accountable person **must** make sure that this policy is followed and put into practice effectively. Assurance **must** be carried out in accordance with [JSP 815 \(Defence Safety Management System\) Element 12 – Assurance](#).

A chapter assurance checklist can be found at Annex D. Please note its use is not mandatory, but it can provide helpful evidence to assist in the assurance and conformance against the policy direction within this chapter.

¹ Guidance for cadet forces is set out in JSP 814 (Policy and Regulations for Ministry of Defence Sponsored Cadet Forces).

Alternative acceptable means of compliance

This policy is mandatory across Defence and the only acceptable means of compliance (AMC) is attained by following the directive set out in this chapter. However, there may be circumstances where a small number of military units may be permanently unable to comply with (keep to) parts of the policy. In such circumstances an alternative AMC process is set out in the [JSP 375 Directive and Guidance](#).

Part 1: Directive

Introduction

1. This chapter sets out the directive and guidance for managing visiting workers and contractors on the Defence estate in a structured methodology that will enable Defence to ensure that hazards in any shared work area or any other hazards that may be introduced as a result of work activities are effectively managed. The policy contained within this chapter applies to all activities where Defence employing organisations share the same workplace with visiting workers / contractors undertaking any work on behalf of Defence.
2. The four main elements required in any visiting worker and contractor management system are: co-ordination, co-operation, communication, and control. Effective application of the four elements of this system, often referred to in Defence as the 4Cs System, **should** help reduce the likelihood of harm or damage arising from the actions of Defence, visiting workers and contractors working on the Defence estate.
3. The policy contained within this chapter **must** be used to complement the requirements of [Chapter 33](#) (Maintenance, Construction and Excavation) of JSP 375 Volume 1; [JSP 375 Volume 3](#) and Statute within the [Construction \(Design and Management\) \(CDM\) Regulations 2015](#) for activities governed by those regulations such as:
 - a. any ground penetration or excavation (tent pegs, road pins, earthworks, trenches, tunnels or shafts and so on.);
 - b. the construction or maintenance of buildings or structures; or
 - c. installation, commissioning, maintenance or repair of mechanical electrical, gas, compressed air, hydraulic, telecommunications, computer or similar services normally fixed within a building or structure.
4. Guidance on the selection of contractors can be found in [JSP 376: Defence Acquisition Safety Policy](#), and the Commercial Managers' Toolkit and on the HSE website at www.hse.gov.uk.
5. [JSP 850: Infrastructure and Estate Policy, Standards and Guidance](#) also details the responsibilities of Accountable Persons and contractors on the Defence estate, and the requirements for an Establishment or Site (residual) Hazard Register as part of the handover document set for site management, holding, transfer or disposal, under JSP 850 in accordance with the MOD's Site Closure Standard and Guidance.

Key health and safety legislation

6. Employers have a general duty under the [Health and Safety at Work etc. Act \(HSWA\) 1974, Section 2](#), to ensure, so far as is reasonably practicable, the health, safety and welfare at work of all of their employees and, under [Section 3](#), anyone else who may be affected by a work activity.

7. There is also a duty on employers under the [Management of Health and Safety at Work Regulations \(MHSWR\) 1999](#) to carry out a suitable and sufficient assessment of the risks to the health and safety of their employees. As such, Defence requires commanders, managers and accountable persons to make sure that suitable and sufficient risk assessments are carried out in order to mitigate health and safety risks to the personnel under their area of responsibility. Defence safety risk assessments **must** be carried out in accordance with [Chapter 8](#) (Safety risk assessment and safe systems of work) of JSP 375 Volume 1.

8. The [Secretary of State \(SofS\) for Defence Policy Statement on health and safety](#), sets out SofS's commitment for Defence to comply with all the applicable health and safety legislation when in the United Kingdom (UK). When overseas, 'we will comply with the laws of Host States, where they apply to us, and in circumstances where such requirements fall short of UK requirements, we will apply UK standards so far as is reasonably practicable to do so.'

Policy Statements

9. Defence has established the following policy statements, which **must** be followed.

- a. **Policy Statement 1.** A Defence organisation's most senior leader **must** make sure that their Safety Management System includes arrangements to enable effective co-ordination, co-operation, communication and control (4Cs) when dealing with visiting workers and contractors and is implemented for all units, establishments or platforms under their area of responsibility.
- b. **Policy Statement 2.** The accountable person **must** make sure that co-ordination, co-operation, communication and control (4Cs) arrangements are in place, including written delegation and formal appointment of a 4Cs Appointed Person and, their deputies where appropriate.
- c. **Policy Statement 3.** The 4Cs Appointed Person **must** make sure the process for the management of visiting workers and contractors is effectively managed on the unit, establishment or platform to which they have been appointed.
- d. **Policy Statement 4.** The Area Custodian **must** manage their co-ordination, co-operation, communication and control (4Cs) area(s) of responsibility, including making sure that a hazard register(s) is maintained and to communicate and co-ordinate on health and safety matters with any visiting workers / contractors, prior to work commencing.
- e. **Policy Statement 5.** All visiting workers and contractors **must** have an identifiable (named) Host, on whose behalf they are acting. The Host **must** provide visiting workers / contractors with suitable and sufficient information and instruction to safely carry out their activities.

Policy Statement 1

A Defence organisation's most senior leader **must** make sure that their Safety Management System includes arrangements to enable effective co-ordination, co-operation, communication and control (4Cs) when dealing with visiting workers and contractors and is implemented for all units, establishments or platforms under their area of responsibility.

10. The Defence organisation's most senior leader **must** make sure that the co-ordination, co-operation, communication and control (4Cs) arrangements are included as part of their Defence organisation's Safety Management System.
11. The Defence organisation's most senior leader **must** make sure that the units, establishments, sites or platforms under their area of responsibility have appropriate arrangements and resources in place to implement the key elements and components identified in this chapter under subsequent policy statements. This responsibility is generally delegated to the accountable persons of the relevant units, establishments, sites or platforms as a part of their terms of reference.
12. The Defence organisation's most senior leader **must** make sure that the management of visiting workers and contractors is monitored on each unit, establishment, site or platform under their area of responsibility, as part of their existing health and safety assurance programme.
13. The Defence organisation's most senior leader **must** make sure that any contracts written for contractors to undertake work under their area of responsibility include the requirement for contractors to comply with local and organisational 4Cs procedures, including adherence to security measures, providing suitable and sufficient risk assessments, method statements and the reporting of near misses, accidents, incidents and so on.

Policy Statement 2

The accountable person **must** make sure that co-ordination, co-operation, communication and control (4Cs) arrangements are in place, including written delegation and formal appointment of a 4Cs Appointed Person and, their deputies where appropriate.

14. The title of '4Cs Appointed Person' (4CsAP) **must** be used across Defence as this is the recognised nomenclature throughout Defence and its contractors.
15. A 4CsAP **must** be formally appointed by the accountable person for the unit, establishment, site or platform under their area of responsibility. The 4CsAP **must** have the appropriate management attributes, competence and authority to oversee the process for the management of visiting workers and contractors.
16. The 4CsAP **must** make sure that a 4Cs System is in place for the unit, establishment, site or platform to which they have been appointed. The 4Cs System **must** make sure that Defence personnel:
- a. co-ordinate Defence, visiting workers and contractors' activities;

- b. communicate to the visiting workers / contractors the known hazards and control measures that Defence has implemented (**must** consider combined hazards);
- c. have a management organisation in place to enable visiting workers and contractors to comply with the points above, regarding their own activities;
- d. co-operate with all interested parties when implementing control measures;
- e. have appropriate arrangements in place to monitor and control work activities and procedures;
- f. select contractors who are competent and able to comply with the health and safety aspects associated with their undertakings;
- g. clearly identify the responsibilities of Defence and visiting workers / contractors for controlling health and safety risks in any locally produced contract, and that the duties are transferred to any sub-contractor when and where appropriate;
- h. clearly articulate the requirement for visiting workers / contractors to report health and safety near misses, accidents or incidents² to their Host while on the unit, establishment, site or platform; and

Note: This is also in accordance with the [DIO FDIS Contract, Call-Off Schedule 30](#), Section 13.

- i. provide trained and competent Defence personnel to undertake the 4Cs system duties appropriate to their role (see Annex A).

17. Where there is a central client according to Defence Acquisition protocols or regional Maintenance Management Organisations (MMOs) arrangements, the 4Cs System **must** be developed in line with them.

18. Where appointed, the role of 4CsAP **must** be included on the accountable person's Organisation and Arrangements Statement.

19. The accountable person **must** make sure that provision is made for the 4CsAP to receive any additional training and resources necessary for them to be competent and effective in the role.

20. The accountable person **must** make sure 4Cs arrangements are in place, including written delegation and formal appointment of a 4CsAP and, where appropriate, deputies. Where no delegations are in place, the role defaults to the accountable person.

21. 4Cs arrangements **must** be made in accordance with any specific location and wider Defence security arrangements, making sure that, where applicable, those entering the unit, establishment, site or platform requiring escorts are managed properly. Additionally, the 4Cs arrangements **must** make sure that a suitable person, the Host, is assigned as the person responsible for the conduct of the workers on the Defence estate.

22. The accountable person **must** make sure that the post of 4CsAP is covered during normal working hours and take into consideration any need for out-of-hours coverage.

² In accordance with [Chapter 16](#) (Safety occurrence reporting and investigation) of JSP 375, Volume 1.

23. A 4Cs System for a unit, establishment, site or platform **must** be divided into geographical areas or physical locations, which will be known as 4Cs Areas. Where the organisation is accountable for smaller platforms, these **must** be identified individually, and also be known as 4Cs Areas. An area can be for example:

- a. a structure or asset, such as a mast, chimney, tower, bridge or tunnel, external areas, including road networks, ranges, airfields, jetties, storage yards and so on, including over-ground and underground services;
- b. a building, or part thereof (for example a plant room);
- c. a group of buildings; and
- d. a platform / vehicle / establishment.

Policy Statement 3

The 4Cs Appointed Person **must** make sure the process for the management of visiting workers and contractors is effectively managed on the unit, establishment or platform to which they have been appointed.

24. The 4CsAP **must** be a person with the appropriate competence and authority, as determined by the accountable person and included within their terms of reference, to manage the process for the management of visiting workers and contractors.

25. The 4CsAP does not need to be a subject matter expert in all aspects, as this is a co-ordination role. However, they **must** have access to competent health and safety support and advice.

26. The 4CsAP **must** compile all 4Cs Area Hazard Registers which will constitute the Unit / Establishment / Site / Platform Hazard Register. Where the 4CsAP is not the same person as the site health and safety specialist, they **should** make sure to liaise with them to avoid a duplication of effort and to encourage collaborative work.

27. Where they are to be appointed, (as stated in relevant establishment Health and Safety Management Systems) the 4CsAP, in consultation with relevant managers, **must** appoint Area Custodians.

Note: Permanent contractors may not be able to be compelled to act as Area Custodians. Liaison with local management and a volunteer system and details of arrangements within local safety management systems **must** be considered.

28. The 4CsAP **must** consider whether the scope of work requires the use of a specific 'Safe Systems of Work', for example a Permit to Work (PTW), Permit to Dig, or provision of specific site information such as Asbestos Registers or use of [MOD Form 5050](#) – Excavation – Statement of Known Hazards.

29. Processes and procedures **must** be put in place locally by the 4CsAP, which puts duties on appointed Area Custodians and Hosts to make sure that:

- a. Any contractor appointed to work on their site **must** be competent to undertake the task(s) required;
- b. Any risks associated with the work have been thoroughly considered;

- c. Risk assessments and method statements for the proposed work are provided by the contractor and approved before the work starts;
- d. Any Permits to Work that are required are communicated and coordinated with the appropriate personnel before the work starts;
- e. Monitoring of contractors takes place appropriately, with Hosts undertaking formal spot checks and Area Custodians undertaking informal checks when contractors are working in their area;
- f. All visiting workers / contractors understand they **must** report any health and safety near misses, accidents or incidents³ to their Host while on the unit, establishment, site or platform; and
- g. They understand what the requirements are for notifying the 4CsAP of visiting workers / contractors. The 4CsAP may not need to be aware of all visiting workers / contractors.

30. 4CsAP's **must** make sure to provide suitable information, instruction and (where applicable) training to nominated Hosts and Area Custodians prior to their appointment, to enable them to understand and discharge their 4Cs duties.

31. Where there are MMO arrangements, the 4CsAP **must** collaborate with them to make sure the local 4Cs System is fit for purpose, as the MMO will likely act as the Host for the majority of contractors and visiting workers. Where this is the case, it is at the discretion of local 4Cs System on how / when the 4CsAP is notified of visiting workers / contractors.

Policy Statement 4

The Area Custodian **must** manage their co-ordination, co-operation, communication and control (4Cs) area(s) of responsibility, including making sure that a hazard register(s) is maintained and to communicate and co-ordinate on health and safety matters with any visiting workers / contractors, prior to work commencing.

32. An Area Custodian **must** be appointed by the 4CsAP (in consultation with their Manager) to compile a hazard register(s) for their 4Cs area(s) of responsibility.

33. Where appointed, an Area Custodian **must** have 'ownership' of one, or several, 4Cs Areas and will depend on several factors:

- a. existence of localised boundary fences, for example compounds;
- b. existing management demarcations and arrangements;
- c. the ability of the Area Custodian to control the Areas;
- d. the physical proximity of the Areas; and
- e. the nature of the hazards relative to the Area Custodian's own knowledge and experience. When the Areas have been defined and agreed, a plan which identifies them and clearly defines their boundaries **must** be produced and made available as and when required. A schedule of the Areas (and Area Custodians) **should** also be developed. These documents **should** be produced and maintained by the 4CsAP.

³ In accordance with [Chapter 16 \(Safety occurrence reporting and investigation\) of JSP 375, Volume 1.](#)

34. The Area Hazard Register (example format at Annex B) is critical to the establishment 4Cs System as it enables Defence to inform visiting workers and contractors of the hazards they will meet. Each defined 4Cs Area **must** have its own Area Hazard Register, which **should** be collated, maintained, reviewed and held by the Area Custodian. The Area Hazard Register **should** include the following:

- a. fixed hazards - including details of the hazards associated with the structure / infrastructure, these will be inserted into the Register by the organisation or individuals responsible for holding the relevant records or information;
- b. working / operational hazards - added by the Area Custodian following discussion with those who have the best knowledge of the hazards and their control measures;
- c. reference to risk assessments and the control measures that have been put in place, precautions, remarks and any other supplementary information (for example requirements for the operation of permits to work); and
- d. a list of transient and occasional visiting workers to the Area and indicate the nature of the induction or briefing required for them.

35. An Area Custodian **must** have relevant knowledge and experience of their 4Cs Area(s) of responsibility and be able to communicate and co-ordinate on health and safety matters with any visiting workers / contractors, prior to work commencing.

36. Visiting workers, contractors and hosts **must** be made aware of who the Area Custodian (or deputy) in control of their work area is for 4Cs purposes.

Policy Statement 5

All visiting workers and contractors **must** have an identifiable (named) Host, on whose behalf they are acting. The Host **must** provide visiting workers / contractors with suitable and sufficient information and instruction to safely carry out their activities.

37. A Host **must** be named as the sponsor of a specific work activity, with specified responsibilities, and is responsible for providing the visiting workers / contractors with suitable and sufficient information and instruction to safely carry out their activities and they **must** provide them with an initial safety briefing.

38. Hosts **must** decide what level of safety briefing is appropriate for their visiting workers / contractors and arrange any briefings in conjunction with the Area Custodian(s) / 4CsAP, Security or Guardroom personnel. Security and Guardroom Personnel **should** provide a general site brief for all visiting workers / contractors and **should** not allow escorted visiting workers / contractors to proceed until collected by an appropriate representative.

39. The Host **must** make sure that any contractors they are responsible for who have been appointed to conduct work on their site is competent to do so, and to notify the 4CsAP that they have confirmed the contractor's competence.

40. The Host **must** make sure that any risks associated with the work have been considered thoroughly and to check the risk assessments and method statements of visiting workers / contractors and / or their proposed control measures.

41. Where the Host is unable to effectively check the competence, risk assessments and method statements of visiting workers / contractors, they **must** seek support from someone who is suitably qualified and experienced (for example the site health and safety officer).

42. Visiting workers / contractors **must** co-operate and co-ordinate with their Host and provide them with risk assessments and method statements relative to the task, which **must** be approved prior to work commencing.

43. The Host **must** consider how they will monitor the work that is being carried out by their visiting workers / contractors to make sure that it is conducted to the agreed standards and procedures, for example the use of Personal Protective Equipment (PPE) or Permits to Work (PTW).

44. The Host **must** make sure that any visiting worker / contractor that they are responsible for, reports any health and safety near misses, accidents or incidents to their Host while on the unit, establishment, site or platform, in accordance with [Chapter 16](#) (Safety occurrence reporting and investigation) of JSP 375, Volume 1.

45. The Host **must** notify the Guardroom, and the 4CsAP as necessary, of the arrival details of any contractor(s) / visiting workers and **should** provide the briefing requirement for them.

46. Before a visiting worker / contractor commences work, the Host **must** consider whether a risk assessment is required, and if so, make sure that one is completed for the area / work taking place. The Host **should** liaise with the relevant Area Custodian or 4CsAP and consult any relevant Hazard Registers to make that decision.

47. Individuals **must** also assume Host responsibilities for those they invite onto the site in a private capacity (for example a visiting contractor engaged to repair a car windscreen). Whilst it is unreasonable to expect the same rigorous procedural measures to be applied in this case, all personnel need to be made aware of their responsibility to ensure that appropriate arrangements are made to escort the visitor, provide a brief on site hazards, and to ensure that the visitor does not endanger others.

48. Where there are MMO arrangements, work that falls within the scope of those arrangements (managing subcontractors or supply chains) **must** (contractually) be managed by the MMO, who will act as the Host and deliver the relevant local 4Cs brief.

49. Where there are MMO arrangements and contractors or visiting workers come to the site to complete work that falls outside the scope of the MMO arrangements, the local 4Cs System applies and someone from the site **must** act as the Host. For example, if a telecoms company visits the site to install Wi-Fi, this would not come under the MMO, and someone from the site would act as the Host.

Note: Where contract provisions allow, the MMO may be tasked (at cost) to undertake the Host role on behalf of Defence for those contractors & visiting workers not directly under its contracted control.

Part 2: Guidance

This part provides the guidance and good practice that **should** be followed to help you comply with this policy.

Management arrangements

Policy Statement 1

A Defence organisation's most senior leader **must** make sure that their Safety Management System includes arrangements to enable effective co-ordination, co-operation, communication and control (4Cs) when dealing with visiting workers and contractors and is implemented for all units, establishments or platforms under their area of responsibility.

1. For activities governed by the requirements of the CDM Regulations, the 'Client'⁴ **should** make sure that the 4Cs System elements are brought to the attention of the Principal Designer and the Principal Contractor for inclusion in the health and safety file (and allied procedures). This **should** be detailed within the Defence organisation's Safety Management System.
2. The Defence organisation's most senior leader **should** delegate the 2LOD assurance of 4Cs to their organisation safety centre or equivalent.
3. The Defence organisation's health and safety assurance programme **should** include checks that local 4Cs systems are compliant with their safety management system and this chapter.

Policy Statement 2

The accountable person **must** make sure that co-ordination, co-operation, communication and control (4Cs) arrangements are in place, including written delegation and formal appointment of a 4Cs Appointed Person and, their deputies where appropriate.

4. Access to competent support and advice (for example the local health and safety officer) **should** be made available to aid Defence personnel carrying out the health and safety aspects of tasks or procedures for the management of visiting workers and contractors.
5. Where appropriate, deputy 4CsAP's **should** be appointed to fully cover the role of 4CsAP when they are unavailable either during periods of absences (leave, training, sickness and so on).
6. The name of the 4Cs Appointed Person (4CsAP) **should** be clearly displayed where visiting workers and contractors book into the site and the name and contact details of the 4CsAP provided at the health and safety briefing.

⁴ CDM Regulations define the 'Client' as "any person for whom a project is carried out" this can be an individual, group of individuals or an organisation.

7. The 4CsAP **should** make sure that a copy of the 4Cs Hazard Register is readily available to all stakeholders and used to determine the significant risks; and **should** be referred to in Induction Briefs and made available to visiting workers / contractors when their activities span several 4Cs Areas.
8. The 4CsAP, in conjunction with local health and safety officer and managers, may designate certain Areas, part of an Area, or a high-risk activity as requiring special controls. The 4CsAP **should** maintain a list of any such ‘special activities or locations’ and bring it to the attention of all relevant stakeholders.
9. Physical assets and workplaces **should** be regularly reviewed by the 4CsAP in conjunction with relevant managers. These could take place in conjunction with regular accountable person inspections (often referred to as CO’s Inspections). This review is required in order to establish:
- a. the extent of the various Areas (including “satellite⁵” Areas);
 - b. who is responsible for the physical asset(s) / workplace(s);
 - c. the significance and number of risks identified within the specified Areas;
 - d. what existing control measures are already in place and the personnel nominated for controlling access to the area (e.g. Building Custodians, Asset Managers); and
 - e. any planned changes.
10. The various assets **should** be listed (for example buildings and surrounding areas etc) and where appropriate grouped with each asset or group of assets representing a potential 4Cs Area. Assets can be grouped together into a single 4Cs Area with a single Area Hazard Register if they can be controlled by the same Area Custodian having the same or similar hazards
11. The 4CsAP **should** conduct regular assurance checks of Hosts and Area Custodians to make sure they are following all relevant 4Cs policy.
12. Where there are MMO arrangements in place, the 4Cs System **should** be developed to include the provision of MMO support for works / events that are not within their supply chain or remit. For example, if a unit is holding an open day which will bring vendors onto the site, they may be required to pitch tents or gazebos. As the MMO would hold the most up to date Statement of Known Hazards (SoKH) information, the unit would need to ask the MMO to mark out the safe areas for the tents to be pitched.

⁵ ‘Satellite’ areas are areas controlled by the unit or establishment that are not physically part of the main unit or establishment.

Key personnel guidance

Policy Statement 3

The 4Cs Appointed Person **must** make sure the process for the management of visiting workers and contractors is effectively managed on the unit, establishment or platform to which they have been appointed.

13. The duties of the 4CsAP can be summarised into five key areas:

- a. Emergency preparedness. For low-hazard sites, the 4CsAP **should** make sure that arrangements are in place to deal with emergencies and that all relevant parties are aware of such arrangements through unit, establishment, site or platform safety and emergency instructions and briefings;
- b. Identification of hazards. The 4CsAP **should** combine all current reviewed Area Hazard Registers into a Unit / Establishment / Site / Platform Hazard Register, which **should** be made available to all personnel, hosts, visiting workers / contractors and so on, for them to fully understand the hazards that they need to consider and mitigate;
- c. Communication of hazards. The 4CsAP **should** make sure that systems are in place for visiting workers / contractors to receive a relevant safety briefing and to understand the nature of the hazards in their proposed area of work. Such briefings **should**:
 - (1) take place prior to the commencement of work;
 - (2) ensure that all hazards in the specific area are identified and explained; and
 - (3) include Emergency and Disaster Plans, and evacuation procedures.
- d. Interfacing duties with MMOs and other contractors. The 4CsAP **should** provide hazard information within their competence. They are not responsible for any technical hazards or aspects of the work, unless they are responsible for a technical facility. The 4CsAP **should** co-ordinate the provision of hazard information, including making sure the co-ordination of information on matters outside of their area of competence; and
- e. Feedback and co-ordination. The 4CsAP **should** make sure that regular feedback from Defence personnel on the safety performance of contractors and hosts is gathered and assessed, and failings reported to the appropriate Defence management authority and where applicable, any continuous improvement registers held by the local health and safety officer.

14. Information access and sharing **should** be considered locally and the 4CsAP **should** liaise with the relevant MODNET Local Security Officer (LSO) as the MMO and other contractors may not have access to MOD SharePoint.

15. An overview of the 4Cs System **should** be provided to all Defence personnel and visiting workers / contractors, and specific briefings given covering the arrangements in place for the 4Cs area in which visiting workers / contractors will work. A Tri-fold leaflet – The MOD 4Cs System – A Guide for Visiting Workers and Contractors is provided at Annex C. This **should** be actioned by the relevant 4CsAP or delegated to the relevant Area Custodian.

16. The 4CsAP **should** conduct ‘spot-check’ inspections on contractors conducting work on their site as a part of their assurance to the Accountable Person. Where there are MMO arrangements, it **should** be done in collaboration with the MMO.

Policy Statement 4

The Area Custodian **must** manage their co-ordination, co-operation, communication and control (4Cs) area(s) of responsibility, including making sure that a hazard register(s) is maintained and to communicate and co-ordinate on health and safety matters with any visiting workers / contractors, prior to work commencing.

17. The Area Custodian **should** represent ‘ownership’ of a physical space or asset (the 4Cs Area).

18. The Area Custodian **should** be a ‘focal point’ for H&S issues within their 4Cs area, which they **should** then relay to the 4CsAP and / or the local Health and Safety Officer.

19. The Area Custodian **should** be aware of who is working in their Area, by making sure commanders and managers in their 4Cs area are aware of their role.

20. Each working location within a 4Cs Area **should** hold a Visitors Log that **should** be signed by all visiting workers / contractors, including transient or occasional visiting workers to a 4Cs Area to enable the Area Custodian to have records of visiting workers / contractors in the 4Cs Area. The 4Cs Visits Log **should** record:

- a. who the visiting workers / contractors are;
- b. the purpose of their visit;
- c. where they are working in the 4Cs Area;
- d. whether an induction briefing has been received; and
- e. when they are visiting (date, time in and time out).

21. The responsibilities of an Area Custodian **should** include these key areas:

- a. Identification of hazards. The Area Custodian **should** compile and maintain an Area Hazard Register; and maintain the associated risk assessments and hazard surveys that underpin the register’s information. This **should** be done with personnel who are competent to assess the risks of the site hazards such as the site health and safety officer or technical staff from the MMO and their main contractors. The 4CsAP **should** combine all Area Registers into a single Unit / Establishment / Site / Platform Hazard Register;
- b. Communication of hazards. The Area Custodian **should** know of the systems in place for contractors and visitors to receive a relevant safety briefing to understand the nature of the hazards in their work or visit area and contribute to such briefings as required. The briefings **should**:

- (1) take place prior to any commencement of work;
- (2) make sure that all hazards in the specific area are identified and explained; and
- (3) include Emergency and Disaster Plans, and evacuation procedures.

c. Interfacing duties with Defence stakeholders and other contractors. The Area Custodian **should** provide hazard information within their competence. They are not responsible for any technical hazards or aspects of the work, unless they are responsible for a technical facility; and

d. Feedback and co-ordination. The Area Custodian **should** contribute to the feedback on the safety performance of contractors and hosts which the 4CsAP **should** gather and report to the accountable person.

22. The register **should** be reviewed at least annually by the Area Custodian in conjunction with all interested parties and may be subject to formal audit by the 4CsAP.

23. The role of Area Custodian does not require a detailed knowledge or technical competence in the various work activities. These are the responsibility of the various specialists involved. The role is to act as the 'focal point' for the exchange of health and safety information. It is not intended that this will require the Area Custodian to be the local health and safety representative, but regular liaison with the site health and safety officer (or equivalent) would be advantageous.

Policy Statement 5

All visiting workers and contractors **must** have an identifiable (named) Host, on whose behalf they are acting. The Host **must** provide visiting workers / contractors with suitable and sufficient information and instruction to safely carry out their activities.

24. The Host **should** always consider the safety performance of contractors and visiting workers and report any failings to their 4CsAP / health and safety officer.

25. Visiting workers / contractors **should** co-operate and co-ordinate with their Host and, where appropriate, provide them with approved risk assessments and method statements relative to the task.

26. A regular visiting worker is someone who regularly frequents a Host's area of responsibility where the following factors may apply:

- a. their activities usually present a 'trivial' risk to health and safety;
- b. they may have permission to arrive unannounced, or out of normal working hours; and
- c. it is considered unnecessary for them to receive an individual local induction / briefing from the Area Custodian each time they arrive to work.

27. While regular visiting workers will not normally need to receive a health and safety briefing from their Host each time they visit, they **should** be kept up-to-date with changes in work activities or processes since their last visit, this may require them to report to the Host to ascertain if there have been any recent changes.

28. The Host **should** make sure that any visiting workers / contractors sign in and out of relevant visitors logs for the area in which they work, and that arrangements are made locally to regularly send visitors logs to the Area Custodian.

29. Personnel residing in an area **should** be made aware of visiting workers / contractors, and that they may arrive without notice to carry out their work.

Retention of records

30. All records **must** be kept in accordance with [Chapter 39](#) (Retention of Records) of JSP 375, Volume 1.

Related documents

31. The following documents **should** be consulted in conjunction with this chapter:

a. [JSP 375, Volume 1](#);

- (1) Chapter 03 - Traffic Management;
- (2) Chapter 08 - Risk Assessment;
- (3) Chapter 16 - Safety occurrence reporting and investigation;
- (4) Chapter 23 - Electrical safety;
- (5) Chapter 25 - Noise;
- (6) Chapter 28 - Confined Spaces;
- (7) Chapter 30 - Permit to Work;
- (8) Chapter 31 - Hot Working;
- (9) Chapter 33 - Maintenance, Construction and Excavation;
- (10) Chapter 36 - Asbestos;
- (11) Chapter 37 - Public Events; and
- (12) Chapter 39 - Retention of Records.

b. Other MOD Publications;

- (1) [JSP 375, Volume 3](#);
- (2) [JSP 815 - Defence Safety Management System Framework](#); and
- (3) [JSP 850 - Infrastructure and Estate Policy, Standards and Guidance](#).

c. Legislation and Guidance;

- (1) [Management of Health and Safety at Work Regulations](#);
- (2) [HSE L24 – Workplace health, safety and welfare](#); and
- (3) [The Construction \(Design & Management\) Regulations 2015](#)