SUBCONTRACTOR RAMS REVIEW REPORT

Asphalt surfacing – independent advisory review to support the client's competent person

Client (main contractor)	[Client Name] (e.g. tier 1/2 civils main contractor)	**Report ref / issue**	[ETM-RR-XXXX] / [01]
Project / site	[Project Name], [Site Address], [Postcode]	**Date received**	[DD/MM/YYYY]
Subcontractor	[Subcontractor Name]	**Date of report**	[DD/MM/YYYY]
Client contact	[Name], [Role – e.g. Site / Project Manager]	**Planned start on site**	[DD/MM/YYYY]
ETM reviewer	[Reviewer Name], [Qualifications – e.g. NEBOSH / CMIOSH]	**Review type**	Initial review (recheck: [Not yet requested])

Document reviewed: [Subcontractor Name] – Asphalt Surfacing RAMS, Rev [B], dated [March 2024], [14] pages. Supplied with: copies of [5] operative/operator cards, plant list, a generic COSHH sheet for “bitumen emulsion”. Reviewed against client documents supplied: scope of works extract, site rules, Construction Phase Plan (extract) and traffic management drawing [TM-XXX Rev X].

Summary of the submission (fictional, for demonstration). The RAMS covers planing, bond coat, paver-laid base and surface course, rolling and ironwork adjustment. It reads as a company-standard document: it does not name the site, refers to “the works area” throughout, has no traffic management or Chapter 8 content, and carries the same risk ratings before and after controls. The laying sequence and hot-material PPE are described well; most gaps are in planning, permits, plant competence and site-specific arrangements.

At a glance

RECOMMENDATION TO THE CLIENT'S COMPETENT PERSON: RETURN FOR REVISION
4 critical, 6 major, 3 minor findings. In our view the RAMS is not yet suitable to support a start on site.

4 CRITICAL	6 MAJOR	3 MINOR
Resolve before acceptance	Resolve before work starts	Correct at this or next revision

Priority issues for the subcontractor to close:

- **No traffic management content (C1):** no TM plan reference, Chapter 8 layout, plant/pedestrian segregation or vehicle routes.
- **No safe digging controls (C2):** ironwork excavation with no permit to dig, service drawings or CAT and Genny scan.
- **Reversing plant (C3):** no exclusion zone or trained vehicle marshaller for paver, rollers and tipper wagons.
- **Plant competence (C4):** operator card categories not stated; one roller operator card expired.

1. Findings

Each finding refers to the section of the submitted RAMS. Severity reflects our view of the potential consequence and the gap against the client's documents and legal duties; it is advisory.

Critical – Could foreseeably lead to serious injury, a service strike or a clear legal gap. Recommend not accepting until closed.	**Major –** Significant gap or weak control. Should be closed before the activity starts.	**Minor –** Document quality / good practice. Correct at this or the next revision.

Ref	RAMS section	Finding	Why it matters (legal / guidance)	Severity	Recommended action
C1	Sect. 4 Method; Sect. 6 Risk assessment	No traffic management plan referenced. No Chapter 8 layout, segregation of plant from pedestrians/operatives, vehicle routes, tipping points or TM operative competence. Client scope states works are adjacent to a live site haul road and a public footway.	CDM 2015 reg 27 (traffic routes) and reg 15(2) (contractor to plan, manage and monitor); HSG144 (safe use of vehicles on construction sites); Traffic Signs Manual Chapter 8 / Safety at Street Works and Road Works code of practice where the highway is affected.	**Critical**	Reference client TM drawing [TM-XXX] or provide own TM plan; describe set-up, phasing, pedestrian diversion and who installs/maintains TM, with card scheme stated.
C2	Sect. 4 step 5 – Ironwork	Breaking out around ironwork is described with no permit to dig, no review of service drawings, no CAT and Genny scan or safe digging practice. Conflicts with client site rule requiring a permit to dig for any ground-breaking.	HSG47 Avoiding danger from underground services (planning, locating, safe digging); CDM 2015 reg 25(4) (no work liable to create risk from an underground service without suitable and sufficient steps); client site rules.	**Critical**	Add pre-dig sequence: obtain client permit to dig, check service drawings, CAT and Genny scan by trained operative, mark-up, hand-dig near services. Name who does it.
C3	Sect. 4 steps 6–8; Sect. 6 risk 3	No exclusion zone around paver, rollers or tipper wagons and no vehicle marshaller (banksman) for reversing. Control stated only as "operatives to be aware of plant".	HSG144 (paras 39–40) – reversing is a major cause of fatal construction transport accidents; avoid reversing, otherwise use a safe system with signallers and aids. CDM 2015 reg 27 and reg 28(2) (warning / person directing driver); client site rule: all reversing to be marshalled.	**Critical**	Define exclusion zones, marshaller appointment and signals, tipper approach/reversing routes, reversing aids on plant, and rule for hand-rakers working near rollers.
C4	Sect. 5 Personnel; card copies	Operator card categories are not stated against the plant used. Card copy for one roller operator shows an expired card; no evidence supplied for the planer operator.	CDM 2015 reg 8(1) and (3) and reg 15(7) (skills, knowledge, training and experience); PUWER 1998 reg 9 (training for those using work equipment); client site rules require valid card for each machine operated.	**Critical**	Provide a named operator matrix: machine, card scheme (CPCS/NPORS etc.), category, card number, expiry. Replace or renew the expired card before start.
M1	Sect. 6 risk 7; Sect. 8 Permits	Gas burner / LPG torch used for joint heating and ironwork, but no hot works permit, fire extinguisher, LPG cylinder storage/transport, hose checks or fire watch.	CDM 2015 reg 29 (prevention of risk from fire) and reg 32 (fire detection and fire-fighting); HSG168 Fire safety in construction; DSEAR 2002 for LPG; client hot works permit system.	**Major**	Add hot works permit, extinguisher type at point of work, cylinder storage and transport, pre-use hose/regulator checks, and post-work fire check.
M2	Sect. 4 step 4 – Planing	No dust controls for planing or breaking out. RAMS states "dust masks if required". No water suppression, RPE type, face-fit testing or health surveillance.	COSHH 2002 regs 6, 7 and 11; respirable crystalline silica has a workplace exposure limit in EH40/2005; HSE CIS36 Construction dust expects dust controlled at source (water or on-tool extraction) plus suitable RPE.	**Major**	Specify water suppression on planer and breakers, RPE with an APF of at least 20 (e.g. FFP3, per CIS36) with face-fit testing, clean-down method and health surveillance arrangements.
M3	Sect. 9 COSHH	Bond coat COSHH is a generic sheet for "bitumen emulsion": no product name, supplier SDS, exposure route, PPE specific to spraying, spill or wash-down controls.	COSHH 2002 reg 6 (suitable and sufficient assessment) and reg 7 (prevention or control); assessment must reflect the actual product and task.	**Major**	Provide product-specific COSHH assessment and SDS for the bond coat used; include spray method, PPE, first aid, storage and spill response.

Ref	RAMS section	Finding	Why it matters (legal / guidance)	Severity	Recommended action
M4	Throughout; Sect. 1–3	RAMS is generic: no site name, location of works, access route, working hours, neighbours, interfaces with other trades or reference to the client's Construction Phase Plan and site rules.	CDM 2015 reg 15(2) (plan, manage and monitor own work) and reg 15(3)(b) (comply with relevant parts of the construction phase plan); Management of H&S at Work Regs 1999 reg 3 (suitable and sufficient risk assessment).	**Major**	Make site-specific: location plan, access/egress, hours, interfaces, phasing, and align with client site rules and CPP sections listed in the supplied extract.
M5	Sect. 10 Emergency	Emergency arrangements are generic ("dial 999, go to nearest hospital"). No named first aider, nearest A&E, assembly point, burns treatment for hot bitumen or link to client's site emergency plan.	CDM 2015 reg 30 (emergency procedures); Health and Safety (First-Aid) Regulations 1981; burns from hot asphalt require specific first aid arrangements.	**Major**	Add site-specific emergency details, burns first aid (cooling, do not remove bitumen), first aid kit/burns kit, and reference to the client's emergency plan.
M6	Sect. 6 Risk assessment	Residual risk ratings are identical to initial ratings for every hazard, so the assessment does not show that controls reduce risk. Several residual ratings remain High.	Management of H&S at Work Regs 1999 reg 3; general principles of prevention (Sch. 1, via reg 4). A High residual risk normally means the activity should not proceed as planned.	**Major**	Re-assess each hazard after controls are improved; show realistic residual ratings and explain any that remain High.
m1	Sect. 12 Briefing	No operative briefing / sign-off sheet included.	CDM 2015 reg 15(8)–(9) (supervision, instructions and information to workers); provides evidence the RAMS was briefed.	**Minor**	Add a sign-off sheet (name, company, card no., signature, date) and state who delivers the briefing.
m2	Cover; Document control	Revision B dated March 2024; stated 12-month review date has passed. No record of what changed between revisions.	Document control demonstrates the RAMS reflects current methods, people and plant; supports the principal contractor's duty to plan, manage and monitor (CDM 2015 reg 13(1)).	**Minor**	Re-issue as new revision with current date, revision history and named author and approver.
m3	Sect. 11 Health	Noise and hand-arm vibration covered only as "wear ear defenders". No tool selection, trigger-time management or reference to exposure assessment.	Control of Noise at Work Regs 2005; Control of Vibration at Work Regs 2005 – reduce exposure at source before relying on PPE.	**Minor**	Add low-vibration tool selection, exposure monitoring arrangements and hearing protection zones around planer/breakers.

2. Competencies and Documents Checklist

Based on the evidence supplied with the submission. "No" means not supplied or not valid at the date of review.

Area	Item	Evidence	Comment
Competence	CSCS (or equivalent) cards for all named operatives	✓ **Yes**	[5] cards supplied, in date.
Competence	Plant operator cards matched to machine and category (paver, rollers, planer)	✗ **No**	Categories not stated; one roller card expired; planer operator card not supplied (C4).
Competence	Supervisor training (e.g. SSSTS / SMSTS)	! **Partial**	Supervisor named; certificate not supplied.
Competence	Vehicle marshaller (banksman) trained	✗ **No**	No marshaller named or trained (C3).
Competence	CAT and Genny operator trained	✗ **No**	Not mentioned (C2).
Competence	Traffic management operatives (card scheme as required by TM plan)	✗ **No**	No TM content (C1).
Competence	First aider on site	! **Partial**	"First aider available" – not named.
Documents	Site-specific traffic management plan / Chapter 8 layout	✗ **No**	Not referenced (C1).
Documents	Permit to dig and service drawings referenced	✗ **No**	Not referenced (C2).
Documents	Hot works permit referenced	✗ **No**	Not referenced (M1).
Documents	Product-specific COSHH assessments and SDS (bond coat, others)	! **Partial**	Generic sheet only; no SDS (M3).
Documents	Plant pre-use inspection / maintenance records	! **Partial**	Pre-use checks mentioned; records not supplied.
Documents	Lifting plan / LOLER thorough examination	**N/A**	No lifting operations in scope as described.
Documents	Emergency arrangements linked to client's site plan	✗ **No**	Generic only (M5).
Documents	Operative briefing / sign-off sheet	✗ **No**	Not included (m1).
Documents	Current revision, date and approver	✗ **No**	Rev B, March 2024; review date passed (m2).

3. What's Done Well

- **Laying sequence:** clear, logical steps for paving, hand-raking at edges and rolling patterns.
- **Hot materials PPE:** heat-resistant gloves, safety boots suitable for hot asphalt and long sleeves specified.
- **Weather limits:** stop criteria for heavy rain and low temperatures are stated.
- **Manual handling of ironwork:** use of lifting keys and two-person lifts for covers and frames is described.
- **Plant list:** plant and attachments are listed, which makes the competence gaps easy to close.

4. Requested Resubmission Actions

We suggest the client returns the RAMS with the following requests. A resubmission should address every critical and major finding and show changes clearly (e.g. revision history or tracked changes).

No.	Action for [Subcontractor Name]	Closes	Priority
1	Add TM section referencing client drawing [TM-XXX] (or own Chapter 8 plan), with segregation, vehicle routes and TM competence.	C1	Before acceptance
2	Add safe digging sequence for ironwork: permit to dig, service drawings, CAT and Genny, hand-dig zone.	C2	Before acceptance
3	Define plant exclusion zones, marshaller arrangements and reversing controls for paver, rollers and tippers.	C3	Before acceptance
4	Provide named operator matrix with valid cards and categories; renew/replace expired card.	C4	Before acceptance
5	Add hot works, silica dust and product-specific bond coat COSHH controls.	M1–M3	Before start
6	Make RAMS site-specific; add site emergency arrangements; re-score residual risks.	M4–M6	Before start
7	Add briefing sign-off sheet, update revision/date, add noise and vibration controls.	m1–m3	This revision

5. Turnaround and Recheck

- **Initial review:** returned within [X] working days of receiving a complete pack (RAMS plus the client's scope, site rules and any TM or permit requirements).
- **Recheck:** a resubmitted revision is checked against the findings in this report within [X] working days. Each finding is marked Closed, Partly closed or Open; new content is checked for new gaps.
- **Queries:** the reviewer is available to discuss findings with the client's competent person by phone or email: [Phone] / [Email].

6. Limitations and Disclaimer

IMPORTANT:

• This is an advisory desktop review only. It is not an approval, acceptance or certification of the RAMS. ETM Safety Docs does not approve RAMS.

• The decision to accept, reject or request changes to the RAMS rests solely with the client's competent person.

• This review does not transfer, share or discharge any duty of the client, principal contractor, contractor or subcontractor under CDM 2015, the Health and Safety at Work etc. Act 1974 or other legislation.

• The review is based only on the documents supplied and listed on page 1, at the date of the report. We have not visited the site, verified card or certificate authenticity, inspected plant or observed the work.

• Findings and references are given in good faith to assist the client's review; they are not an exhaustive list of hazards or legal requirements. Site conditions, scope or method changes may require further review.

Reviewed by (ETM)	[Reviewer Name], [Qualifications]	**Date**	[DD/MM/YYYY]
Issued to	[Client contact], [Client Name]	**Distribution**	Client only – onward sharing at client's discretion

SAMPLE DOCUMENT: All company, site, people and document details are fictional placeholders shown in [square brackets]. Findings relate to a fictional RAMS created for demonstration.