

Construction (Design and Management) Regulations 2025 Consultation Report

PUBLIC CONSULTATION RESULTS

Health and Safety Inspectorate

Version Control

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Construction (Design and Management) Regulations 2025 Consultation Report

<https://consult.gov.im/environment-food-and-agriculture/construction-design-and-management-regs-2025>

This report was created on Friday 22 May 2026 at 14:34

The activity ran from 17/11/2025 to 31/03/2026

Responses to this survey: 7

EXECUTIVE SUMMARY OF RESPONDENT COMMENTS:

There was strong and consistent support for modernising the Isle of Man's (IOM's) construction health and safety framework through alignment with UK standards. This approach was seen as logical and beneficial, providing a clear, well-established structure that would improve consistency, compliance and overall safety outcomes. However, respondents emphasised that while the direction of travel was widely supported, the success of the new regime would depend on effective, practical implementation. In particular, there was a clear expectation that the framework must remain proportionate and outcome-based, taking account of the Island's context, including smaller projects, constrained sites and public-sector governance and funding pressures.

A key theme was the need for greater clarity on how duties would operate in practice, especially in relation to client responsibilities and the Principal Designer role. Respondents were looking for clear explanations of what compliance would look like in real-world scenarios, including where risk cannot be fully eliminated and more proportionate or alternative controls are required. There was also a strong and consistent call for supporting guidance and structured transition support, including IOM specific guidance aligned to UK HSE materials, alongside training, practical tools and worked examples. Without this, respondents highlighted a risk of uncertainty despite alignment with UK legislation.

The proposed implementation timetable was generally supported but respondents recognised that this would be a significant transition that would require careful planning, clear transitional arrangements and sufficient time for all duty-holders, particularly smaller organisations, to adapt.

Finally, respondents stressed the importance of maintaining close alignment with the UK model in practice, minimising unnecessary divergence in structure and terminology. Where differences would be unavoidable, respondents expected clear explanation and cross-referencing to avoid confusion and additional burden.

Overall, stakeholders were supportive of the reforms, with the primary focus being on ensuring the framework was clear, proportionate and well-supported in delivery.

We asked:

The Department of Environment, Food and Agriculture (DEFA) has been reviewing specific UK Health and Safety legislation to form a judgment on whether the Island would benefit from greater alignment with UK Health and Safety Executive (HSE) standards. As part of that process, consideration has also been given to whether this UK HSE legislation would enhance public and worker safety for offshore energy developments. This process has culminated in public consultation of specific draft legislation, with the starting point for most of the legislation being existing UK legislation.

DEFA has welcomed stakeholder and public feedback on the proposed health and safety legislation, and where appropriate any associated guidance documentation, through this public consultation process

You Said:

There is strong and consistent support for modernising the Isle of Man's construction health and safety framework through alignment with UK standards. This approach is seen as logical and beneficial, providing a clear, well-established structure that will improve consistency, compliance and overall safety outcomes. However, respondents emphasised that while the direction of travel is widely supported, the success of the new regime will depend on effective, practical implementation. In particular, there is a clear expectation that the framework must remain proportionate and outcome-based, taking account of the Island's context, including smaller projects, constrained sites and public-sector governance and funding pressures.

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We did:

The DEFA Health and Safety at Work Inspectorate (HSWI) is grateful to all those who took the time to consider and respond to this consultation.

Due to the December 2025 holiday period and the limited number of initial responses received, it was decided to extend the closing date of the outstanding health and safety legislation consultations to 31 March 2026.

The consultation process and responses received informed the Department's assessment of the benefits of the proposed legislation. All consultation responses were considered in detail, alongside direct engagement with relevant Manx businesses. The consultation process has therefore informed the Department's decision making. Having considered all available information, the Department has decided to pause the introduction of this tranche of legislation until further notice.

Further engagement between DEFA HSWI and the UK Health and Safety Executive (HSE) will take place in June 2026. Should the Department subsequently decide to proceed with the introduction of any of the draft legislation, this will first be reviewed against the latest position of the relevant UK legislation and updated where necessary. If any substantive changes are made as a result, a further public consultation exercise may be undertaken.

Construction (Design and Management) Regulations 2025 Health and Safety Legislation Consultation

CONSULTATION QUESTIONS

Question Number	Title	Total Responses
1	Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?	7 (100.00%)
2	Are there any parts of the legislation being consulted upon that require more clarity to aid understanding and assist with compliance?	7 (100.00%)
3	Is the proposed implementation strategy and timescale for the introduction of the Construction (Design and Management) Regulations 2025 appropriate for industry readiness?	7 (100.00%)
4	Are there any specific support mechanisms (e.g. guidance, training, transitional arrangements) that would help you or your organisation prepare for the new legislation?	7 (100.00%)
5	Do you have any other comments on the draft Construction (Design and Management) Regulations 2025 legislation attached to this stage of the overall consultation process?	6 (85.71%)
6	Is there anything else you'd like to tell us about the proposed changes or the consultation process?	7 (100.00%)

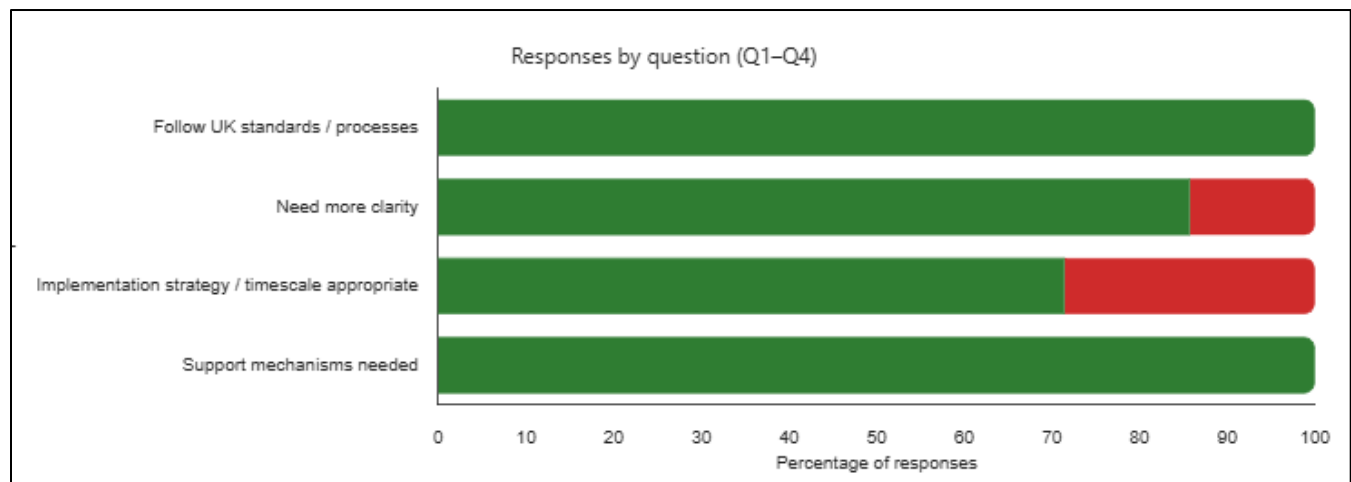


Fig 1:
Question (Q1–Q4) - Percentage of Responses (Yes/Agree, No/Disagree, Not Answered)

CONSULTATION QUESTIONS – INDIVIDUAL SUMMARY OF RESPONSES BY QUESTION

Question 1

Do you agree that the Isle of Man should follow UK standards and processes for health and safety laws and its regulation?

There was unanimous support for alignment with UK standards. Respondents consistently said this would improve clarity, consistency and confidence across the sector, especially for organisations, designers, contractors and clients already working to UK-based frameworks. A common view was that alignment would allow continued reliance on established UK guidance, training materials, Approved Codes of Practice (ACOP) and existing good practice, while also helping to raise standards in construction health and safety on the Island. Some respondents also saw wider benefits for design quality, maintenance planning and futureproofing of buildings and infrastructure.

Question 2

Are there any parts of the legislation that require more clarity to aid understanding and assist with compliance?

Most respondents said “Yes”, but that further clarity would be helpful. The strongest themes were the need for clearer guidance on client duties, especially for public bodies, smaller projects and governance-led organisations; the role and expectations of the Principal Designer; and how the regulations should apply in low-risk, short-duration, maintenance-led, historic or constrained sites. Respondents also wanted more clarity on what “so far as is reasonably practicable” meant in practice, how compliance and enforcement would be judged, and how the proposed regime differs from the current CDM 2003 arrangements. One particularly strong point from industry was concern that if the IOM regulations are re-numbered or restructured differently from the UK, it could create avoidable confusion, increase administrative burden and make training and compliance harder.

Question 3

Is the proposed implementation strategy and timescale for introduction of the Construction (Design and Management) Regulations 2025 appropriate for industry readiness?

The majority view was that the proposed 1 August 2028 commencement date is broadly appropriate and gives industry enough time to prepare. Those who supported the date said it should allow for updates to internal systems, procurement arrangements, governance processes, budget cycles and staff training. However, there were also some concerns. A minority did not think the current proposal was yet sufficient, mainly because the changes are seen as a major shift from the existing regime and would require widespread awareness-raising, guidance and training before implementation. Respondents also highlighted the need to avoid projects starting under one regime and finishing under another without clear transitional arrangements.

Question 4

Are there any specific support mechanisms that would help you or your organisation prepare for the new legislation?

This question produced a very consistent message: respondents want practical support alongside the legislation. The main requests were for IOM-specific guidance aligned as closely as possible to UK HSE guidance (especially ACOP L153), together with training, briefing sessions, workshops and webinars for different duty-holder groups. Respondents also wanted worked examples, online materials, standard client information, clarity about appropriate training courses, and guidance on projects that may straddle the old and new regimes. Public-sector and statutory respondents additionally raised the need for support that recognises governance and funding constraints, while one respondent highlighted the Island's limited occupational health capacity as something that may need attention if wider compliance duties increase.

Question 5

Do you have any other comments on the draft Construction (Design and Management) Regulations 2025 legislation attached to this stage of the consultation?

Overall, respondents were supportive of the direction of travel and saw the draft as a positive modernisation of the Island's framework. At the same time, they stressed that successful implementation would depend on the regulations being practical, proportionate and closely aligned to the UK approach. Several respondents asked for guidance and enforcement to recognise the realities of working in older buildings, constrained sites and public-sector funding or governance systems, where risk cannot always be designed out entirely and mitigation may need to be used instead. Industry responses also emphasised the importance of retaining UK wording, structure and numbering where possible, or otherwise providing a clear cross-reference to the UK regime to avoid confusion. Some respondents explicitly welcomed alignment not only with CDM but also with related construction regulations such as Work at Height, Lifting Operations and Lifting Equipment Regulations and Provision and Use of Work Equipment Regulations.

Question 6

Is there anything else you'd like to tell us about the proposed changes or the consultation process?

In the final comments, respondents largely reinforced earlier themes rather than introducing new issues. The strongest messages were that implementation must be supported by clear guidance, realistic expectations, proportionate enforcement and continued engagement with industry and public-sector stakeholders. Respondents again called for minimal divergence from the UK model, early publication of local guidance, supporting materials to aid transition, and sufficient lead-in time to prepare duty-holders properly. The overall tone was constructive and supportive, with respondents keen to see the regulations succeed provided the transition is well managed.