

Steering Group on Competence
for Building a Safer Future

RAISING THE BAR
EXECUTIVE SUMMARY

Improving Competence
Building a Safer Future

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IMPROVING COMPETENCE BUILDING A SAFER FUTURE

Executive Summary

Interim Report of the

Industry Response Group Steering Group on Competence for Building a Safer Future

August 2019

Foreword

October will mark the 40th anniversary of my career in the construction industry. At any time during the first 38 of those years, I would have argued passionately that the UK had the best-qualified construction industry of any country in the world, and that the industry has done much to improve its efficiency, particularly in prioritising the health and safety of its workforce.

That awful night on 14 June 2017 changed my opinion. What we have learned since that dreadful tragedy is that a whole host of circumstances may have contributed to the rapid fire spread and that failings in the relevant competences across all those working on higher risk residential buildings (HRRBs) is likely to have been a key part of that mix.

It is also salutary to accept that it is not just residents' safety from fire spread in high-rise towers that should concern us. Had the collapse of nine tonnes of masonry at Oxfords Primary School, in Edinburgh (January 2016) happened on a different day, we might have been considering the deaths of schoolchildren arising from industry failures. Significant concerns have also been raised by the collapse of the Nottingham City Car Park (August 2017) and the failure of large-scale concrete panels in several tower blocks.

Whilst writing this foreword, I received a letter from a coroner, sent to me under Regulation 28 of the Coroners (Investigations) Regulations 2013, concerning the death of a man from legionella pneumonia. The coroner had concluded that 'expert evidence suggested that architects, construction engineers and others designing water systems for care homes and healthcare premises, rarely take into account the need for water safety'.

These – and other - issues mean that it is essential for the focus of our work to be on competence for all issues of the life safety of those who occupy and use the facilities that we construct.

It was my privilege to chair the Competence working group during phase 2 of Dame Judith Hackitt's post-Grenfell Review and I was disturbed by some of the complacency that I encountered during that work. Chapter 5 of her report, *Building a Safer Future*¹ threw out a challenge to the industry: get your act together and come up with an improved set of systemic competences within a year, or government will mandate some imposed solution. Working under the auspices of the Industry Response Group, set up jointly by the MHCLG² and the three leading industry umbrella bodies (Build UK, the Construction Industry Council and the Construction Products Association) with the support of the Local Government Association and the National Fire Chiefs' Council, the Competence Steering Group (CSG) was established a year ago to take up that challenge.

I have chaired 29 meetings of the CSG over the past year, ably and industriously supported by Peter Caplehorn (CPA) and Peter Yates (LGA) as deputy chairs and by a steering group and working group process that has engaged 300 people. It has been an enormous undertaking, bringing together the largest alliance of built environment organisations ever to work together for a common purpose, drawn from more than 150 institutions, associations and businesses across the full spectrum of construction, built environment, fire safety and building owner/manager sectors. Dame Judith Hackitt recommended that ten areas of competence should be addressed. The CSG extended this to twelve and set up working groups of experts to develop enhanced competence frameworks plus other groups to look at

¹ *Building a Safer Future*, published 17 May 2018

² Ministry of Housing, Communities and Local Government

the principles of competence and how the process should be managed by an overarching competence system.

The CIC has generously sponsored my involvement over the past year and also that of the CSG Secretary, Denise Chevin (ably deputised on occasion by Steven Thompson of the RICS). The combined total input from all those engaged is conservatively estimated at around £6m-£7m in the donated time and expenses of experts and in direct costs. CIC, the NHBC, the RICS and the Engineering Council have generously donated meeting rooms and ancillary costs to the CSG. Countless other organisations have done so for the many working group meetings.

I am also particularly indebted to Scott Steedman of the BSI³ who accepted my late request to come up with a solution to the Hackitt recommendation for an Overarching Competence Body when the CSG appeared to be blocked on the issue. His working group (WG0) has managed an elegant solution that has met with universal approval from all involved. Izzy Connell, Dee O'Connell, Kara Kashemsanta and Bethany Dunning of MHCLG have been towers of strength in terms of keeping us in line with the spirit of Dame Judith's recommendations and their implementation in other areas.

Although many individuals have contributed to the CSG, I am particularly indebted to the unwavering support and wise counsel of my two deputy chairs, plus Hanna Clarke (CPA), Malcolm Hynd (UKAS⁴), Sarah Garry (Build UK), Gary Strong (RICS⁵) and Katy Turff (Engineering Council) in addition to the Chairs and Secretariat of each working group who are separately identified in the interim report.

Our report comes hot on the heels of the government's own consultation on post-Hackitt legislation, which was published on 6 June 2019 and included our proposals for the overarching system for overseeing competence requirements for buildings in scope of the new regime. *Raising the Bar* is also therefore issued, as an Interim Report, for consultation (with consultative conferences planned for 30 September and 18 October 2019) and we will look forward to the views of every stakeholder in that process.

Our Report is entitled *Raising the Bar* because everyone involved wants to see a paradigm shift in competence levels throughout all sectors. We are particularly concerned to understand whether we have the balance of competence enhancements at a level that will truly raise the bar and lead to behavioural changes, and whether there are unintended consequences that we should understand.

The combination of enhanced competence standards for those working on higher risk buildings and an independent process for overseeing this new regime will – irrespective of anything else that arises from the Hackitt reforms – mean that the industry is at last taking the life safety of those who will occupy the buildings we create just as seriously as the safety of those who build them.

The full report comes in three hefty volumes and this separate Executive Summary has been issued for ease of reference for our main proposals and recommendations.

Graham Watts OBE
Chair, Competence Steering Group
16 August 2019

³ British Standards Institution

⁴ United Kingdom Accreditation Service

⁵ Royal Institution of Chartered Surveyors

EXECUTIVE SUMMARY

What our report sets out to do

This report provides a blueprint for improving the competence of those involved in designing, constructing, inspecting, assessing, managing and maintaining Higher Risk Residential Buildings (HRRBs), and other buildings in scope, to ensure they are safe for all who occupy them.

It sets out a package of measures for tackling the competence shortcomings identified in Chapter 5 of the Hackitt Review, *Building a Safer Future*, published in May 2018, in the wake of the Grenfell Tower tragedy. Our report, *Raising the Bar*, responds to the four key recommendations set out by Dame Judith.

The report is urging all disciplines working on HRRBs (and other buildings in scope) to adopt and take forward the competence frameworks developed by twelve working groups. These set out the skills and knowledge needed, how these should be assessed, and for the assessing organisations themselves to be accredited or licenced by a third-party independent body, such as UKAS or the Engineering Council. The report then recommends the formation of an overarching body to drive continued improvement and oversee the work of those drawing up and assessing competences and to draw up a national register of key dutyholders. This was developed by an additional working group.

The industry at large has been keen to address failings in fire safety and life safety more widely, and has come together to form the largest-ever alliance of built environment organisations working for a common purpose. More than 300 people have been directly involved from some 150 institutions and associations across the full spectrum of construction, built environment, fire safety and building owner/manager sectors.

We believe our recommendations achieve two objectives: they lay firm foundations for a more coherent and consistent approach to assessing and ensuring competence across the critical disciplines; and accompanied with the right legislation, they pave the way for a culture change across the whole building industry, so that everyone recognises their responsibility as part of a wider system for delivering safe buildings.

Our ambition is that in time the competence frameworks should be adopted for all building types.

Background to our work

Dame Judith Hackitt's review, *Building a Safer Future*, identified a lack of consistency in the processes and standards for assuring the skills, knowledge and behaviours of those working on HRRBs as constituting a major flaw in the current regulatory system.

Dame Judith pointed to a fragmented approach, with different competence frameworks even within one discipline; a lack of professional qualifications; and in instances where qualifications did exist, no coherent way for how they should be evidenced so as to be clearly understood by those operating in the system.

In response to Dame Judith's report and to address these failings, the Steering Group on Competence for Building a Safer Future, known as the Competence Steering Group (CSG),

was set up and brought together representative organisations from across the spectrum of the built environment and fire disciplines. It was given a year to come up with proposals to meet the recommendations for addressing competence set out by Dame Judith.

The CSG was itself set up under the auspices of the Industry Response Group, established in the immediate aftermath of the Grenfell Fire, in June 2017; jointly by the Ministry of Housing, Communities and Local Government and Build UK, Construction Industry Council and Construction Products Association and the National Fire Chiefs' Council.

The CSG was tasked with:

- Developing the role and remit for an overarching competence body
- Ensuring a coherent and consistent approach to raising and overseeing competence standards within each discipline in scope; and
- Supporting the delivery of competent people working on HRRBs.

How the work was undertaken

The CSG tackled the challenge of raising competence standards for specific sectors by focusing on the ten disciplines set out in Dame Judith Hackitt's final report *Building a Safer Future*, plus two further sectors (Procurement professionals and Products), which the CSG considered equally important to bring about the necessary improvement.

Twelve working groups were therefore formed for individual sectors to develop competence frameworks, which would report to the CSG. Subsequently, a separate group (known as WG0) was tasked to come up with recommendations for the role and remit of the overarching body (or system for overseeing competence) with an aim of driving up standards and providing oversight of competence in a way that gives assurance to residents, dutyholders and regulators that those involved in the design, construction, inspection, maintenance and management of HRRBs are fully competent to perform these roles.

The working groups are:

- Overarching Competence Body (WG0)
- Engineers (WG1)
- Installers (WG2)
- Fire engineers (WG3)
- Fire risk assessors (WG4)
- Fire safety enforcing officers (WG5)
- Building standards professionals (WG6)
- Building designers, including architects (WG7)
- Building safety managers (WG8)
- Site supervisors (WG9)
- Project managers (WG10)
- Procurement professionals (WG11)
- Products (WG12)

What the working groups have covered

For many of the working groups the work has involved:

- Appraising the competence frameworks and qualifications that already exist;
- Developing additional competence frameworks for general construction and operation;

- Developing additional frameworks specific to those working on HRRBs, where required; and
- Setting out the frequency that they need to be reassessed and by whom.

Each working group has set out how they will implement change which will have a positive impact on culture within their sector. The CSG believes that, when combined, these proposals will support a paradigm shift in culture change.

The approaches of the working groups differ in that some professions expect their new competence frameworks to apply to all types of buildings; others are specifically focusing these new requirements on the buildings that will be in scope to the proposed legislation (HRRB+).

The CSG's goal was to ensure that ALL individuals involved in HRRBs, including those who do not identify with being a 'professional', cannot accidentally (or deliberately) slip through the net – and moreover, that their obligation to carry out their duties competently is spelt out to them.

The CSG's focus has not solely been on fire safety: it has also considered how to develop skills and competences pertaining to all aspects of building life-safety related to completed buildings, and potentially across all buildings to raise the bar and drive the much-needed and far-reaching culture change.

CSG also developed Principles of Competence to ensure there was a basic understanding and common foundation for all disciplines.

The measures and approaches CSG suggests are designed to sit alongside an enhanced regulatory framework which will be necessary to ensure all businesses and individuals undertake their professional obligations. Without such regulatory rigour, it remains likely that bids will still be won on lowest price and the culture of cutting corners and putting building users at risk will remain.

It is vital that Government takes the lead and commits to requiring that any company or individual working on a central Government or local authority and public sector construction project meets the competence frameworks set out within this report.

Without these drivers for companies to make the necessary investment to achieve all the recommendations in this report for assuring competence, the process of improvement will be slower and companies may choose to shun HRRB work.

An overarching system for overseeing competence

In *Building a Safer Future* it is clear that Dame Judith was convinced that industry should set up an overarching body to oversee and continue to improve competence across the range of disciplines involved in working on and in HRRBs. This body, she believed, needed to bring a degree of independence to the process so that no organisation could be seen to be 'marking their own homework'.

The CSG gave considerable thought and discussion to the role of an overarching body and in January set up working group (WG0) under the chairmanship of Dr Scott Steedman, director of standards at the BSI and a member of the Industry Safety Steering Group.

It has drawn up an industry-led proposal for a robust, coherent and comprehensive system of overseeing competence that gives assurance to residents, dutyholders and regulators that

those involved in the design, construction, inspection, maintenance and management of HRRBs are competent and understand the risks and responsibilities of their work and act accordingly.

The main proposal is for the role of the overarching competence body to be taken by a new Building Safety Competence Committee.

These recommendations dovetail with the proposals for the oversight of competence in the MHCLG's open consultation: *Building a Safer Future: Proposals for reform of the building safety regulatory system*.

The proposed overarching system takes a dual approach. This comprises a bottom up, 'raising the bar' process for the general workforce; and a top down 'sharp focus' on the three key roles of Principal Designer, Principal Contractor and Building Safety Manager⁶.

The Building Safety Competence Committee will drive competence by developing new national competence standards, robust assessment frameworks and guidance. This Committee will work with and challenge relevant sectors to promote the equivalence of accreditation systems and provide advice to the regulator on selecting competent people. The regulator will hold and maintain a register of those competent to perform the key roles (Principal Designer, Principal Contractor and Building Safety Manager), with advice from the Building Safety Competence Committee.

Principles of competence to underpin behaviours

In responding to *Building a Safer Future*, the CSG determined that it was important for all the organisations represented on the working groups to have a shared appreciation of the key concepts and principles relating to competence. A text to capture the dialogue, based on the Engineering Council's *Statement of Ethical Principles*, has been further developed.

The aim is to communicate a clear, simple and consistent message to ensure all those involved in the procurement, design, delivery, assessment, commissioning, management and maintenance of HRRBs were encompassed, and to ensure those responsible for carrying out work that impacts safety have the proven competence to do so.

Culture change

The CSG recognised that changing culture and behaviour to achieve safer buildings is essential thus reflecting the view reported in *Building a Safer Future*.

The aim is to drive positive cultural impact on two of the symptoms identified: the 'lack of collaboration and improvement culture' and 'poor predictability'. However, other symptoms including 'low margins, adversarial pricing models and financial fragility' and 'workforce size and demographics' have not been within the CSG's scope. As other reports have identified, these two issues are extremely important to developing an efficiently functioning construction supply chain. Low margins and poor payment practices can lead to a culture where high quality outcomes are rejected in favour of those which drive the design and construction of a building towards lowest cost of delivery.

A common approach to continuing professional development (CPD)

CPD is vital for all the sectors covered by *Raising the Bar*, to ensure they maintain their existing skill set and are able to integrate new products, technologies and techniques into

⁶ See R48 on p.15 – WG8 prefers the title Building Safety Co-ordinator

their work. This needs to be supported by robust methods of independent assessment and re-assessment to ensure that all those involved with HRRBs have the necessary competence for the roles they undertake.

Many professional bodies have pre-existing CPD recording frameworks which are mandatory for membership renewal and are clearly understood by the sectors using them. Other sectors, notably installers, have few opportunities to undertake formal CPD and where they do; there is no formal recording process. It is recommended that the competence of all those involved with HRRBs should be regularly re-assessed.

Although the CPD and assessment requirements for each sector will vary significantly, it is proposed that common principles are established to guide each sector, and it is these principles which the Building Safety Competence Committee would use to hold sectors to account.

Summary of recommendations

Recommendations in our report have been split into generic recommendations, as well as a number of specific recommendations for the various disciplines which are provided in more detail in the full interim report.

Generic recommendations by the CSG

Principles of Competence

R1: The Principles of Competence should be adopted for universal use to be embraced as the datum for common competence by all those working on HRRBs and buildings in scope.

Competence frameworks

R2: That the competence frameworks proposed by each working group (WG 1 – WG 12) are adopted.

R3: The Building Safety Competence Committee will need to consider and approve each proposal for competence levels.

R4: Any changes to competence frameworks should be made with full consultation of the relevant stakeholder groups, which may be varied from time to time by the Building Safety Competence Committee.

Cultural improvement

R5: More work is required to review cultural improvement, by considering ethics and behaviours as practical drivers of cultural transformation.

Support for residents

R6: Part of the function of the Overarching Competence System (Building Safety Competence Committee) should be support for residents and signposting to organisations holding competence registers.

Procurement of projects.

R7: Government should take the lead and require that any company or individual working on Government construction projects must meet the competence frameworks set out within this report. Local authorities and the wider public and private sector clients should be encouraged to follow suit.

Accreditation

R8: For those involved with HRRBs, there should be a robust system of reassessment so as to ensure that they have maintained their competence in relation to the work they are registered/certified to undertake, and have a plan to develop new competences where necessary.

R9: The competence of those involved with HRRBs should be demonstrated by independent, third party assessment and periodic reassessment.

R10: Wherever appropriate, Government should mandate persons to be registered/certified by a recognised professional body/ certification body.

R11: Existing arrangements, for assessing and reassessing competence, in the main delivered through certification and professional registration, should be improved to include – as a minimum – the competences needed for working on HRRBs.

R12: All organisations carrying out the assessments and reassessments should themselves be subject to a rigorous system of oversight (in *Building a Safer Future* referred to as ‘accrediting the accreditors’) by a body such as UKAS or Engineering Council. The suitability and consistency of the assessment and oversight processes should be overseen by the Building Safety Competence Committee.

R13: The period of reassessment may vary from discipline to discipline but it should not be less frequent than every five years.

Continuing Professional Development (CPD)

R14: Levels of competence should be maintained and subject to continuing professional development.

R15: There must be suitable management systems within the workplace to monitor competence and record CPD annually.

R16: Common principles of CPD should be established for each sector, which the Building Safety Competence Committee should use to hold sectors to account.

R17: Fire safety CPD materials explaining basic fire science would be beneficial across the industry and for those managing occupied HRRBs.

Areas of competence not yet addressed

R18: A similar approach to the current methodology should be employed for all areas of competence not yet addressed. Specifically working groups should be formed from specialists within the community in question to undertake a process of analysis and enhancement to make competences clear, robust and fit for purpose.

Clear definition of roles and technical terms

R19: The Building Safety Competence Committee should coordinate a set of definitions that can be used in law.

Specific recommendations from the working groups

These recommendations have been agreed by individual working groups, as identified, and have been approved and endorsed by the CSG. Recommendations are only included in this section where they are unique to a working group, rather than apply to all groups. More detailed recommendations can be found in the report of each working group, each of which forms a chapter in *Raising the Bar*.

WG0: An overarching system for overseeing competence

HRRB competence framework as part of suite of national standards

R20: Industry should lead the creation of an HRRB benchmark competence framework covering the core knowledge, skills and behaviours required to work on HRRBs. This should form part of a suite of national standards under the governance of the national standards body against which professional and trade bodies are expected to develop their individual sector-specific or discipline competence frameworks.

Registration and accreditation

R21: Professional and trade bodies that certify or qualify members against the HRRB competence framework national standards are expected to maintain a register of those individuals certified under their scheme and to be accredited/licensed by a suitable publicly recognised body such as UKAS, the Engineering Council or other body, subject to equivalent standards of accreditation or licensing being agreed by the Building Safety Competence Committee.

Building Safety Competence Committee

R22: A strategic, industry-led Building Safety Competence Committee should be created comprising representatives of relevant industry bodies, independent experts, building owners and Government. The committee should be appointed or designated by the building safety regulator to raise competence by working with and challenging professional and trade bodies to drive gap-filling, promote the equivalence of accreditation or licensing systems, issue guidance to dutyholders and the Regulator on selecting competent people, provide a space for industry to continue to work collaboratively to drive competence more widely and provide

or signpost guidance to industry and the public on relevant legislation, registers and standards relevant to buildings in scope.

Additional competence requirements

R23: The three key roles that have primary responsibility for building and life safety at each stage of a building's life-cycle (Principal Designer, Principal Contractor and Building Safety Manager⁷) require competences in addition to any discipline related competences. These additional competences relate to their overarching role to ensure that the design intent of the building is maintained and that workers employed and used in design, construction, refurbishment, maintenance and operation are suitably competent. The competences of these key roles should be developed and maintained as part of the suite of national standards that comprise the competence framework. Market providers that offer to assess individuals against the enhanced competence requirements should be accredited or licensed by UKAS or other suitable body.

Maintaining a register

R24: The building safety regulator should hold and maintain a register of those qualified to perform the key roles, with the advice of the Building Safety Competence Committee and provide sign posting to the registers held by the professional and trade bodies.

WG1: Engineers

Appointment of Lead Engineer

R25: Dutyholders should be required to appoint a Lead Engineer with responsibility for overall safety risk management throughout the building lifecycle.

Systematic safety management process

R26: To improve interfaces between systems and professions, dutyholders should use a systematic safety management process, comprising a safety management system, safety case and a hazard identification and risk assessment methodology, coupled with engineering leadership responsible for ensuring these are integrated and functioning effectively. The proposed process needs to be user-friendly and enable collaborative contribution of stakeholders including residents.

Piloting safety management process

R27: The safety management process and competence framework should be piloted with industry professionals

Enhanced UK Standard for Professional Engineering Competence (UK-SPEC) for HRRBs

R28: The Engineering Council should establish a section of its Register requiring assessment and revalidation against an enhanced 'contextualised' version of the UK Standard for Professional Engineering Competence (UK-SPEC) mapped to an HRRB benchmark competence framework and process. This should include identified levels of

⁷ See R48 on p.15 – WG8 prefer the term Building Safety Coordinator

competence from 'awareness to comprehensive' that can be used to build competence profiles underpinned by a code of ethics and professional engineering conduct.

WG2: Installers

Installer competence framework

R29: An 'industry adopted' framework is proposed for the building safety regulator to monitor all the installer sectors working on HRRBs in particular, but could also be applied to other project types. This consists of an ultimate aim to have a combination of:

- Accredited third party certification of companies;
- Level 2 or 3 qualifications for individuals;
- Card scheme (CSCS logo);
- CPD in the form of refresher training and the maintenance of individual skills; and
- All installers must have a core knowledge of fire safety in buildings – training to be standardised and made mandatory.

Where sectors do not currently have the combination proposed above, these will need to be defined and developed.

Standardised terminology

R30: Standardised terminology in educational terms should be adopted across all installer sectors.

Reviews

R31: There will need to be:

- A review of card accreditation schemes which are not currently partners of CSCS;
- A robust review of contractors' CSCS card-checking processes via the Early Adopters Group;
- A robust, regular audit of CSCS and its processes for awarding cards; and
- Support from industry and government to raise awareness of CSCS in the domestic market.

CPD

R32: An industry-wide CPD/ refresher training programme should be introduced with each sector to define the training to be included, process and accessible storage of records. Contractors and Building Safety Managers should ensure industry-agreed fire safety resources are presented to all installers at induction.

Systems designers

R33: There should be further work by WG2 to explore the competences of systems designers and task supervisors.

WG3: Fire Engineers

Professionally qualified fire engineers must be mandatory

R34: Dutyholders must appoint only professionally registered Fire Engineers to carry out safety critical work on 'in-scope' buildings.

The need for a fire strategy as part of the design

R35: A number of key fire engineering-related deliverables are produced as part of the design process – notably a fire safety strategy for the works, which will describe the basis of the fire safety design and which will detail how the design meets the relevant legislation and standards. This should be updated as the project progresses and on completion an 'as built' version should be handed to the building user. This will assist the dutyholder and their other fire safety advisors and risk assessors undertake their duties once the premises are in occupation.

Fire Engineer role in RIBA Plan of Works

R36: WG3 should continue to co-operate with RIBA to incorporate the Fire Engineer role in the RIBA Plan of Works.

Confidential reporting of fire safety

R37: The Institution of Fire Engineers should continue to work with CROSS (Confidential Reporting on Structural Safety) to incorporate fire safety into the reporting system.

WG4: Fire Risk Assessors

The need for comprehensive assessments

R38: Fire safety in buildings has to be founded upon a qualitative and quantitative methodological process that comprehensively assesses the risk of fire.

R39: The fire risk assessment process is required to support the fire safety strategy and safety case from the design stage, through construction and on into occupation and must include regular reviews.

The need for qualified fire risk assessors in HRRBs

R40: To assure the process is undertaken by competent qualified HRRB assessors it must be a statutory requirement for those responsible for HRRBs to use only persons registered as qualified by their professional bodies.

R41: In HRRBs the fire risk assessment process must only be conducted by assessors capable of demonstrating accredited or validated third party certification and who additionally have demonstrated the highest levels of competence to the standards agreed by their professional bodies.

WG5: Fire Safety Enforcement Officers

Legislative overlap in fire safety

R42: The legislative overlap in fire safety should be resolved or the competence of Housing Act regulators in relation to fire should be demonstrated through a competency framework.

Financial burdens for fire and rescue services

R43: The increased financial burdens to fire and rescue services as a result of the enhanced competence standards proposed in the revised Competence Framework should be addressed by Government to ensure effective regulation of fire safety by professional, competent fire and rescue service fire safety officers.

Recruitment and retention

R44: Government should consider the broader issues associated with recruitment and retention of fire safety officers and support fire and rescue services in addressing these.

Devolved administrations

R45: Consideration needs to be given to how the competency of fire safety officers in the devolved administrations, Crown Premises Fire Safety Inspectorate and Defence Fire Safety Regulators are quality assured.

WG6: Building Standards Professionals

Impartial assessors

R46: Building Standards Professionals should have their competence validation carried out by assessors or assessing bodies that are impartial and are themselves disconnected from the influence of businesses within the construction industry.

WG7: Building Designers

Requirements for designers

R47: Individuals wishing to be recognised via the competence framework for building designers must be a current full member of a relevant construction professional organisation⁸; be subject to and adhere to a code of conduct and disciplinary procedures; and have the specified or relevant experience in HRRBs.

WG8: Building Safety Managers

Title

R48: The Building Safety Manager title should be amended to Building Safety Coordinator (BSC). Due to the extensive scope of their duties and responsibilities, the BSC role sits within a wider organisational structure so that sufficient support and resources are available to enable the BSC to fully exercise their responsibility and duty of care.

⁸ To be agreed by the Building Safety Competence Committee

Competences

R49: To be (come) a competent Building Safety Coordinator, a person must:

- Have minimum relevant experience in managing building risk (duration dependent on building classification) and demonstrate a relevant recognised professional qualification;
- Demonstrate that the requirements of the competency framework are met through assessment of:
 - Accreditation of Prior Experiential Learning;
 - Recognised fire/life/building safety qualification related to the competency standard;
- Comply with the Code of Conduct; and
- Maintain competency through completion of meaningful CPD

Statutory Licensing Structure

R50: A statutory licensing structure for buildings in scope should be introduced covering:

- A building licence: to operate and occupy buildings (in scope) with any residential accommodation, with classification based on building types, occupancy and the level of risks and complexity, amongst others;
- A licence for the Accountable Person (AP) who would be held responsible and accountable for building safety and resident engagement. They must also either be a resident in or have formal representation in the UK. The Accountable Person must ensure a Building Safety Coordinator is appointed for each of the buildings in scope. Whether or not a Residential Accommodation Operator (RAO) is appointed, there should be a direct line of communication between the AP and the BSC;
- A permissioning licence for the Building Safety Coordinator which will be relevant to the building classifications for which the BSC is responsible;
- A licence for a Residential Accommodation Operator to operate residential accommodation. They must employ BSCs appropriate for the building types within their portfolio; and ensure the relevant resources are made available to manage all the classifications of buildings they operate;
- The building safety regulator should hold a national register for these roles; and
- The building safety regulator should maintain a national register of Accountable Persons' Buildings and their classifications. The Building Safety Competence Committee will be responsible for setting, maintaining, assessing and delivering competence standards and maintain a national register for of BSCs.

Strengthened right of 'reasonable and proportionate' access

R51: A strengthened right of 'reasonable and proportionate' access should be enabled for individual residential units. This should be enshrined in new and 'standard' clauses in leases and provided for in existing tenure contracts.

Safety Case and Fire and Emergency File

R52: Key data and information should be available so that the BSC can make evidence-based decisions when managing the building.

R53: The content and structure of the Safety Case and the Fire and Emergency File should be mandated.

R54: Information should only be uploaded and managed by competent persons. It should be held on a single (digital) national database (akin to the Energy Performance Certificate).

R55: The Fire and Emergency File should become mandatory for all residential buildings, (except detached and semi-detached, owner occupied and subject to the building category falling into scope of the new regime) to include for existing 'built' stock (the assumption being that the new regime will be rolled out across different building categories over a period of time).

Improved engagement with residents

R56: The BSC should be responsible for ensuring that all occupiers are better informed about building safety and their role in supporting it. This should be supported by a long-term public sector broadcast campaign.

WG9: Site Supervisors

Independent Construction Assessor

R57: A new role of Independent Construction Assessor should be introduced.

R58: The ICA (normally appointed by the client duty holder), will manage and coordinate the independent assurance of the construction to ensure that it is commensurate with the design intent.

R59: The dutyholder will use reports from the ICA to see that the safety of the building and of people in and around the building is being promoted.

R60: Without sign-off by the dutyholder, based on assurances provided by the ICA, the regulator may not be persuaded that the General Duty of the client has been satisfied and therefore will not permit a project to pass *Building a Safer Future Gateway 3*. This could provide a powerful potential sanction that will help to ensure that the building is constructed correctly.

WG10: Project Managers

Professional body membership

R61: All project managers (PMs) who are to work on HRRBs projects must be members of a recognised professional body (or equivalent).

Knowledge levels

R62: The level of competency that is required of project managers should be 'Comprehensive' given that it would seem right to conclude that the 'level or depth' of knowledge or application for PMs working on HRRB projects should be greater than 'understanding'.

WG11: Procurement Professionals

The need for a Procurement Lead

R63: There must be a Procurement Lead for HRRBs with a comprehensive HRRB procurement competence level involved at every stage of the RIBA Plan of Work.

R64: Implementing this Procurement Lead role will need a culture change in the construction sector and work is needed to raise awareness of the new competence requirements for procurement activities to ensure appreciation and compliance.

WG12: Products

Understanding of use

R65: The Competent SAKE⁹ matrix and methodology should be further developed and implemented across the sector as a benchmark for ensuring correct product interactions.

R66: The new regulatory framework and sanctions must recognise the WG12 competence framework as the way industry should behave when addressing products and their interactions.

R67: As the WG12 framework is developed and applied, due consideration is made to ensure it coordinates and fits with other competence work and with product information standards (being developed by the CPA Marketing Information Group).

How you can participate

The Interim Report, *Raising the Bar*, is being issued to all interested stakeholders as a consultation exercise. You are strongly encouraged to read the full report.

Responses are requested from any interested party and should be received by **18 October 2019**.

Responses should be sent to enquiries@cic.org.uk

⁹ SAKE = Skills, Attitude, Knowledge, Experience

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