

Building Regulations Competent Person Self-certification Schemes Consultation
Sustainable Buildings Division ,
Communities and Local Government
Zone 5/G10 Eland House Bressenden Place
London SW1E 5DU

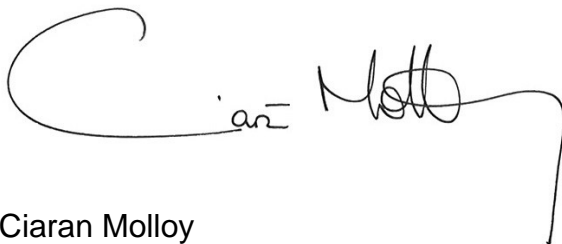
19 March 2010

Dear Sir/Madam,

Please find attached the Construction Industry Council (CIC) response to:
"Building Regulations Competent Person Self-certification Schemes:
Consultation paper".

This response has been done in conjunction with Building Control Alliance, for
whom CIC provide the secretariat.

Yours sincerely

A handwritten signature in black ink. The name 'Ciaran Molloy' is written in a cursive style. The 'C' is large and loops around the 'i'. The 'an' is written in a smaller, simpler font. The 'Molloy' is written in a more complex cursive script. A long vertical line extends downwards from the end of the signature.

Ciaran Molloy

Annex E

Consultation questionnaire

Question 1:			
Do you consider that the criteria in Section 1 of this consultation document are appropriate for the authorisation of competent person schemes?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			

Question 2:			
Is the meaning of each of the criteria clear?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			

Question 3:			
Are there any other criteria which you consider should be applied to competent person schemes?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			
<p>The Construction Industry Council (CIC) and Building Control Alliance (BCA) support the concerns of their local authority members in respect of the notifications received from scheme operators. Both organisations acknowledge that notifications can sometimes be somewhat haphazard and incomplete. Local authorities frequently receive notifications of 'plot numbers' rather than correct postal addresses which can cause local authorities additional administration time (and cost) to resolve. We would suggest that there should be a specific requirement for the scheme operator to include the UPRN in its</p>			

notification to the local authority. This would assist greatly with the smooth operation of the process. We would not expect individual competent persons to have access to the UPRN but it would not be unreasonable for the scheme operators to access that facility.

We would also bring to the departments attention that local authorities often receive multiple notifications of the same work, which can frequently cause additional work.

Question 4:			
Are you content with the steps and timescale the Department is proposing for the consideration of applications to operate a competent person scheme?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			

Question 5:			
Do you support the Department's preference for Option 2 for schemes' complaints systems?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			

Question 6:			
Do you agree that there should be a minimum level of consumer financial protection where the scheme member cannot bring work up to the required standard? If yes, please give your preference for Options 1, 2 or 3 with reasons for your choice?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Preference:			
Option 1	<input type="checkbox"/>	Option 2	<input type="checkbox"/>
		Option 3	<input checked="" type="checkbox"/>
Reasons:			
Consumers are more likely not to take up the protection unless it comes with the product automatically.			

Question 7:			
Do you have any suggestions on other types of protection that might be appropriate if Options 1, 2 or 3 were adopted?			
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
If yes, what is your suggestion:			

Question 8:			
Do you agree that the current system of monitoring the performance of members of schemes should be continued and extended to all authorised schemes?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			

Question 9:			
Do you agree that the Department should allow schemes to move to a risk-based system of monitoring the performance of their members in appropriate cases where they have demonstrated their ability to operate such a system?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			
Subject to full and thorough investigation of any complaints recieved			

Question 10:			
Do you agree with the Department's view that UKAS accreditation should be the requirement for the monitoring of schemes' performance?			
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Comment:			

Question 11:			
Do you consider that the draft Impact Assessment presents a fair representation of the costs and benefits?			
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Comment:			
Insufficient knowledge to comment			

Question 12:			
Can you supply any further information to help develop the Impact Assessment further? In particular we would welcome comment on the assumptions we have made on average per scheme or per member costs of some of the proposed changes, for example on the cost of UKAS accreditation or the cost of additional training.			
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Comment:			