INDUSTRY RESPONSE GROUP

Steering Group on Competences for Building a Safer Future

Second Quarterly Report on progress towards meeting the recommendations on competences in Dame Judith Hackitt's Independent Review of Building Regulations and Fire Safety

July - October 2018

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Introduction/ background

1. This report provides an update on the work since July 2018, when the first report of the Industry Response Group Steering Group on Competences for Building a Safer Future [CSG] was submitted.

2. As detailed in the first quarterly report, the CSG was set up at the request of the Industry Response Group [IRG] and MHCLG to take forward recommendations set out in Dame Judith Hackitt's report *Building a Safer Future*. Specifically to come up with an implementation plan that *should cover the role and remit of an overarching body to provide oversight of competence requirements and support the delivery of competent people working on HRRBs.*

3. As noted in the first report, a preliminary meeting of engaged parties met to form the steering group on 16 May 2018 (the day prior to the publication of *Building a Safer Future*), and since the first full meeting in June the Steering Group has been meeting regularly. The 12th meeting was held on 15 November 2018 at which this Quarterly Report was agreed.

4. The ninth meeting of the CSG, held on 3 October 2018, was opened up to include the chairs and secretariat of each of the twelve working groups, in addition to the CSG members. This was successful in terms of integration and communication and will be repeated for the proposed CSG meeting on 29 November 2018.

5. At all times we have endeavoured to meet the spirit of *Building a Safer Future* by ensuring that membership is balanced between the construction industry/professions/ fire safety sector/ and building owners and managers. A full list of members was provided in the first quarterly report.

Future reporting structure

6. Since the establishment of the CSG under the aegis of the IRG, the Industry Safety Steering Group has been formed under the chairmanship of Dame Judith Hackitt. The CSG Chairman has been asked to report on progress to the ISSG on 3 December.

7. Given that the IRG interest in competence issues was originally tied to the question of capacity relating to the remedial work required post-Grenfell, it is an issue for consideration as to whether the CSG should formally report to the ISSG in future. However, members of the CSG have expressed a wish to continue to report directly to the Industry Response Group.

Response from the Secretary of State to the First Quarterly Report from the CSG

8. The Rt Hon James Brokenshire MP responded, on 12 October 2018, to the first quarterly report on progress from the CSG.

9. The key issues raised in that response, were that the Secretary of State was:

- Looking forward to seeing a **clear plan** developed and agreed across all sectors within the timescale envisaged, to ensure that proposals to ensure those working on higher risk residential buildings have the right level of competence to ensure residents' safety; and
- Expecting to see **initial thinking** on the **Overarching Competence Body**, including its structure, role and remit, and the cross-cutting framework.

10. The anticipation was that these issues will be covered in this quarterly report and for this reason they are the first matters to be addressed.

Action Plan [May 2018 – April 2019

11. The CSG plan for the period from its formation (May 2018) to its intended completion date (30 April 2019), is as follows:

Q1 [May – July 2018]

- **Establish ten working groups to cover the specific areas in which competences in HRRBs is to be addressed;**
  [*Outcome – ten WGs established plus two additional groups on procurement and product manufacture*].

- **Agree the professional bodies, professions and disciplines in scope;**
  [*Outcome – this has been achieved*].

- **Ensure maximum coverage and integration of the construction industry, built environment professions, fire sector and building owners/managers in this work;**

[*Outcome - 104 organisations* are directly engaged in this work, via the CSG and WGs as detailed in Annex G].

- **Integrate all competence work relating to HRRBs within the CSG envelope;**
  [*Outcome – this has been achieved*].

- **Identify and consider any other work relevant to the CSG;**
  [*Outcome – the only project identified is the In Plain Sight initiative of the Institution of Civil Engineers and the CSG has kept in touch with the author of that report, Peter Hansford, and the ICE*].

- **Consider the scope of buildings that fall within the auspices of the CSG competence framework;**
  [*Outcome – the CSG has left issues of scope to each WG to consider in relation to the need for reform. Some WGs have decided to develop bolt-on competence requirements for HRRBs only; others are taking a holistic view of competence reform in their sector; and one - WG8 – is starting from scratch with a new competence regime. An abiding principle agreed early on by the CSG is that once the Overarching Competence Body has been established and a framework of enhanced competences agreed for all those working on HRRBs, this can be required or designated for work on any other buildings, in any sector*].

- **Establish terms of reference for all the WGs;**
  [*Outcome – this has been achieved for all original working groups 1-11 and the terms of reference for WG 12 – Products – will be given with the next quarterly report*].

- **Agree and institute a Memorandum of Understanding for the organisations taking part in the work of the CSG;**
  [*Outcome – this has been agreed but so far only a few organisations have signed up to the MoU. Some are unable to do so because of their own governance restrictions but the CSG has agreed that all bodies should be engaged whether they are able to sign the MoU, or not*].

- **Agree overarching Principles of Competence;**
  [*Outcome – this work was started in June but will not be completed until Q2*].

- **Set up a Community of Interest intranet site;**
  [*Outcome – this has been achieved with the in-kind support of the RICS*].

- **Hold broader stakeholder event**
  [*Outcome – this event was held in coordination with the IRG industry partners on 19 July 2018*].

- **Report regularly to the IRG;**
  [*Outcome – reports were made to the IRG on a fortnightly basis*].

- **First Quarterly Report to the Secretary of State;**
  [*Outcome – this was submitted on behalf of the CSG on 13 July 2018*]

Q2 [July – October 2018]

- **Finalise overarching Principles of Competence;**
  [*Outcome – this work was completed and has been discussed with UKAS - the final draft forms Annex A to this report*].

- **Begin initial thinking on the Overarching Competence Body, including its membership and governance, structure, role and remit, and the cross-cutting framework;**
  [*Outcome – a significant amount of attention to these matters has been given at successive meetings of the CSG, as reported in paras 12-30 in this report and in Annex B*].

- **All Working Groups to have started their analysis of the current competence frameworks and identify what needs to be done to provide the necessary assurance for enhanced competence levels on HRRBs;**
  [*Outcome – all WGs have begun to meet and are reporting regularly to the CSG*].

- **Identify and begin work on other cross-cutting themes;**
  [Outcome – several cross-cutting themes have been identified such as ethical behaviours; CPD; the need to devise a learning model covering the basics of fire science, as a key foundation stone for all those involved in HRRBs; and to establish precise definitions for roles and technical terms that could be used in law to ensure universal standards. There may be other areas yet to be specifically identified where a cross-cutting approach would prove to be the best way forward].

- **Begin work on trialling the safety case;**
  [*Outcome – this work is being led by WG1, under the leadership of George Adams, in association with other WGs, and a process of analysing trial safety cases in projects has begun*]

- **Begin discussions about accreditation arrangements by engaging with UKAS as the national body for accreditation;**
  [*Outcome – this has begun and Malcolm Hynd of UKAS has attended the open meeting of the CSG on 3 October and begun to interact with a number of the WGs directly*]

- **Hold broader stakeholder event;**

[*Outcome – an open meeting of the SCG involving the chairs and secretariat of the WGs was held on 3 October 2018; a further stakeholder event will be held in conjunction with an open meeting of chairs on 29 November 2018*].

- **Report regularly to the IRG;**
  [*Outcome – reports have been made to the IRG on a fortnightly basis*].

- **Second Quarterly Report to the Secretary of State;**
  [*Outcome – this was submitted on behalf of the CSG on 15 November 2018*].

Q3 [October 2018 – January 2019]

- **Agree the title, initial structure, role and remit (to include initial Articles of Association) of the Overarching Competence Body.**

- **Establish the Overarching Competence Body as a Company Limited by Guarantee with initial members drawn from all organisations that have signed the Memorandum of Understanding by the date of its Incorporation.**

- **Agree the appropriate balance between construction sector skills, fire safety skills and those who manage occupied buildings within the governance of the Overarching Competence Body.**

- **Consider the Overarching Competence Body's role in receiving, agreeing and monitoring the individual competence frameworks for those bodies, professions and disciplines in scope for individuals within their membership or on their register.**

- **Consider whether a single competence framework for professional bodies in scope should be established.**

- **Consider whether the competence requirements for those working on HRRBs should also be extended to cover other multi-occupancy residential buildings and to institutional residential buildings.**

- **Consider what lessons may be learned from other sectors and how this may be translated for implementation in construction.**

- **Consider the 'bowtie' hazard and mitigation process, used in the petrochemical industry as a model that could be adapted for developing safety cases for HRRBs.**

- **All Working Groups to provide draft proposals for an enhanced current competence framework that provides the necessary assurance for enhanced competence levels on HRRBs.**

- **CSG to carry out an initial peer review of these proposals.**

- **Via WG6, develop a new common approach and competence framework which meets the requirements of the new regulatory framework and the new skills required of Building Standards Inspectors when working on HRRBs, and those offering consultancy and verification services to dutyholders – to apply to all Building Standards Inspectors whether they are LABS Inspectors and part of the JCA or AIs offering their services to Building Standards or to dutyholders.**

- **Consider whether these competence requirements for Building Standards Inspectors working on HRRBs, and AIs, should also be extended to cover those working on other multi-occupancy residential buildings and institutional residential buildings.**

- **Via WG8, develop and define a robust, comprehensive and coherent system for the competence requirements for the role of building safety coordinator of HRRBs; and the remit of this role by which residents in HRRBs would be able to access fire safety awareness training.**

- **Set up a workshop to review the various recommendations of WG8 [see paras 82-88 in this report]**

- **Review the proposals in Appendix E of Building a Safer Future to ensure that all have been appropriately considered by the CSG.**

- **Identify any proposals that have not been considered by the CSG and report accordingly.**

- **Hold workshop to pool learning from the safety case trials.**

- **Consider draft report on the safety case.**

- **Consider the Overarching Competence Body's role in agreeing and monitoring accreditation and reaccreditation arrangements, to include the period within which the competence of individuals should be reassessed and reaccredited.**

- **Consider the Overarching Competence Body's role is establishing a method for demonstrating and/or proving competence.**

- **Develop an agreed approach to Continuing Professional Development [CPD].**

- **Hold broader stakeholder event in January 2019.**

- **Report regularly to the IRG/ISSG as appropriate.**

- **Third Quarterly Report to the Secretary of State to be submitted.**

Q4 [January - April 2019]

- **Liaise with the Overarching Competence Body.**

- **Agree the Overarching Competence Body's role in receiving, agreeing and monitoring the individual competence frameworks for those bodies, professions and disciplines in scope for individuals within their membership or on their register.**

- **Agree whether a single competence framework for professional bodies in scope should be established; or, if not, proposals for how competence frameworks for professional bodies in scope should be established.**

- **Recommend – sector-by-sector - whether the competence requirements for those working on HRRBs should also be extended to cover other multi-occupancy residential buildings and to institutional residential buildings.**

- **All Working Groups to provide draft proposals for an enhanced current competence framework that provides the necessary assurance for enhanced competence levels on HRRBs.**

- **These draft proposals should be subject to wide scale consultation within the industry and it is suggested that this exercise is the first responsibility of the OCB.**

- **CSG to carry out final peer review of these proposals.**

- **Recommend to the Overarching Competence Body, a common approach and competence framework which meets the requirements of the new regulatory framework and the skills required of Building Standards Inspectors when working on HRRBs, together with those offering consultancy and verification services to dutyholders.**

- **Recommend a common approach and competence framework which meets the requirements of the new regulatory framework and skills required of Building Standards Inspectors when working on HRRB's, together with those offering consultancy and verification services to dutyholders.**

- **Recommend to the OCB, whether these competence requirements for Building Standards Inspectors working on HRRBs, and AIs, should also be**

extended to cover those working on other multi-occupancy residential buildings and institutional residential buildings.

- **Agree a robust, comprehensive and coherent system for the competence requirements for the role of building safety coordinator of HRRBs; and the remit of this role by which residents in HRRBs would be able to access fire safety awareness training.**
- **Recommend a process for assessing and accrediting building safety coordinators of HRRBs.**
- **Complete work on the fire and emergency file.**
- **Complete work on the safety case.**
- **Make recommendations for implementation based on translating good practice developed in relation to competences in other sectors.**
- **Agree the Overarching Competence Body's role in agreeing and monitoring accreditation and reaccreditation arrangements, to include the period within which the competence of individuals should be reassessed and reaccredited.**
- **Agree the Overarching Competence Body's role in establishing a method for demonstrating and/or proving competence.**
- **Agree the approach to Continuing Professional Development [CPD].**
- **Hold final broader stakeholder event in April 2019**
- **Report regularly to the IRG/ISSG as appropriate**
- **Final Report to the Secretary of State to be submitted before 30 April 2019**
- **Hand over responsibilities to the Overarching Competence Body**

Overarching Body

12. The Steering Group has given considerable initial thought and discussion to the various models for the type of legal entity that the Overarching Competence Body (OCB) might take. The range of these potential models is attached as Annex B.

13. This review is continuing and a wide-ranging discussion relating to the principles of the OCB was held at the meeting on 1 November.

14. Members of the steering committee agreed on certain general principles of the OCB. These were that the OCB would:

- take the lead in improving the competence of those working in design, construction and operation of HRRBs;
- provide a coherent approach to setting competence standards across professional bodies and trades organisations, as recommended by Dame Judith Hackitt; and
- Identify and promote training and best practice across the industry and in doing so provide a bridge between trades and professions.

15. The OCB would do this by:
- being industry led;
- operating on a collegiate approach, in that it would not set the standards itself but the standards and competence frameworks would be drawn up by the industry bodies (recognised as primary authorities for this purpose by the OCB) who would submit them to the OCB for peer- review, by appropriate panels of experts from across the built environment professions, construction industry, fire sector and representatives of building owners and managers; and
- keeping up-to-date a register of those individuals who have been certified as competent to work on HRRBs. This would – in effect – be a "Register of Registers".

16. There may be some areas where the OCB might be (or might become) the prime authority if either no such authority exists (perhaps, for example, for Building Safety Co-ordinators) or where there is no agreement within the breadth of a sector as to what the primary authority should be.

17. In order to carry out this role, the OCB would need:

- the power to enforce that those bodies who do not meet the competence standards demanded by the OCB are required to do so, or that the OCB intervenes to ensure the appropriate level of competence is achieved (as part of new regulations to be brought in by Government); and

- to be given the teeth to work with the professional body/ standards organisation to impose sanctions on those individuals who falsely claim to be competent to work on HRRBs.

18. During the course of the discussion a number of matters arose that will need further discussion and development by the Group, or guidance/input from Government to clarify. These were:

- How the OCB and the Register would be funded;
- How the register would work most effectively with companies. The register would be for individuals who are competent to work on HRRBs. We are mindful that in some cases individuals will rely on their company to put in place adequate training. We need to work out how this might this be overseen and accredited from the OCB perspective;
- Also, companies are appointed to take on work, rather than individuals. So there would need to be some mechanism to make it straightforward for clients and sponsoring bodies to be assured that the company they were appointing (usually through the tender process) was employing appropriately competent people;
- Companies would not necessarily have individuals that possess competency accreditation from the same body, particularly on the operational side. Again, this may be something that might pose a problem for a client in terms of readily being able to understand the competence of individuals working for a company.

19. The type of legal entity that would be the most suitable for the OCB to take will be developed at further meetings as an extension of the considerations given in Annex B.

20. At the meeting it was also agreed that there was not a body already in place that could fulfil the role of the OCB covering all aspects of fire, construction the built environment professions and the building owners/managers. It was agreed that the OCB governance should be broadly representative of all these sectors.

21. The possibility was raised that UKAS might be able to play a useful role as a critical friend from an accreditation perspective.

22. It is acknowledged that lay people must play a part in OCB governance, perhaps as non-executives, to ensure an outsiders' and wider perspective is brought to bear on the working of the OCB.

23. There was also a wide-ranging discussion about the relationship between the JCA and OCB. We accept that ultimately it is the role of the OCB to provide assurance to the JCA that duty holders are hiring competent people.

24. One proposal discussed by the group was that checks would be carried out by the JCA at gateway points that firms had appointed those with the right competences to work on HRRBs. There would also need to be checks on the

competences of duty holders and managing agents, which would not necessarily go through these gateways.

25. It is clear that establishing the OCB is not a straightforward exercise given that we have brought together a wide range of different bodies all with different structures and diverse legal and statutory obligations, such as the Architects' Registration Board, the Engineering Council, the Fire and Rescue Services and LABC (both of which are intended to become part of the Joint Competent Authority), the CITB and several organisations governed by Royal Charter. The CSG is endeavouring to evolve a body that all parties feel they can engage directly with.

26. As an aside to this discussion, it is acknowledged that there could be confusion in terminology between the proposed **Joint Competent Authority**, which is to be responsible for the new Regulatory regime for HRRBs, and a new **Overarching Competence Body**.

27. It is also difficult to create an OCB, which may be expected to carry out a number of legislative requirements without knowing what those might be; although it is acknowledged that a new company could grow into owning any subsequent statutory responsibilities over time. Some bodies already have regulatory responsibilities and it needs to be mapped out what they are, and how these duties will sit with those of the new body.

28. The CSG is considering setting up a company as a forerunner to the OCB, owned by member companies, which would provide a vehicle to administer funds and resources and which could evolve into the full OCB, over time. It was agreed that it would not be the role of the Steering Group to draw up details of the administration for the OCB.

29. It is proposed that a **Company Limited by Guarantee** with an appropriate title is established during the third quarter of the CSG's work.

30. It would be preferable for the avoidance of losing momentum in this pace of change, if the new OCB was established before the CSG makes its final report and the baton of responsibility handed over.

Working Groups

31. The Steering Group has established an additional working group since the last report. This working group is to establish competences of those involved in specifying, procuring, constructing and making products. It is chaired by Peter Caplehorn, deputy chief executive of the Construction Products Association and co-deputy chair of the Steering Group.

32. The other ten working groups represent each occupational sector/profession identified as part of the enhanced competence framework in *Building a Safer Future*, plus a working group to look at competences in Procurement.

33. Each of the working groups has produced a progress report detailing their approach and progress to date. For ease of reference, details of the group, the lead body, the chair, the secretary and a brief summary of progress is given below.

WG1 – Engineers
Lead – Engineering Council
Chair – George Adams
Secretary – Katy Turff
1st Meeting – 22 June 2018
Meetings to date - 10
Organisations directly engaged: 16

Progress to date

34. WG1 has decided that in order to develop appropriate competences for HRRBs there needs to be an appropriate safety case to map competences against. Safety case documentation is used in the oil and gas industries but not widely in construction. These two activities of developing a safety case and a contextualised competence standard are being carried out in parallel and will be iterative.

35. The deliverables from the safety case exercise are expected to be:

- An overview and appreciation of what is involved in writing a safety case;
- Identification of engineering competencies mapped to activities in the safety case production and to conduct and complete the safety case trial on an actual HRRB;
- Identification of challenges and barriers in conducting and completing a safety case, including the relation to and content of safety-related documentation; and
- An outline for a Safety Case template highlighting any problems of format, composition and content that have been identified.

36. Negotiations are in progress with building owners for access to two potential sites: one residential and occupied; the other commercial and currently undergoing refurbishment. It is anticipated that a representative of WG8 (building safety coordinators) will participate in at least one of the site visits. WG6 (building standards) and WG10 (project managers) have also expressed an interest and are supportive of the safety case approach. The likely timescale for the site visits is the second half of November.

37. Following the visits, a workshop will be held to pool learning and draw conclusions.

38. The first trial of the safety case process has been completed and will be reported upon in the next quarterly report.

39. WG1 is still working on the development of the role of principal engineer for submission to the CSG.

40. Work has commenced on the competence framework and a sub-group is progressing this.

41. WG1 has identified the 'bowtie' hazard and mitigation process used in the petrochemical industry as a model that could be adapted for developing safety cases for HRRBs. This model will be further explored in preparation for and during the safety case exercise.

42. The CSG will be briefed on the 'bowtie' hazard and mitigation process, during Q3.

WG2 – Installers

Leads – Build UK/ Fire Sector Federation
Chair – Nick Jarman
Secretary – Martin Duggan
1st Meeting – Scheduled for 9 November
Organisations directly engaged: 16

Progress to date

43. With the potential to constitute a very large working group, the executive team has focused on desk research prior to arranging a meeting of potentially more than 40 interested parties. 16 organisations have been identified and contacted to complete a survey identifying the existing qualifications/training structures in place for 36 different fire safety systems that have been identified and a gap analysis will be conducted to identify what training and qualifications are in place and where the gaps arise.

44. The first full open meeting was held at BRE on 9 November: to present the findings of this desk research, identify the gaps and identify who will volunteer to work on these gaps.

45. The 36 fire safety systems that have been looked at so far are passive or active fire protection systems. Expanding the breadth of scope of "installers" to include other types of installations - e.g. heating and hot water systems, electricians etc. - has not been included at this stage.

46. The CSG acknowledges that this needs to be widened to encompass the installation of all construction aspects on HRRBs. It is acknowledged that this scope is beyond the resource possibility of WG2 within the time allowed and that the work needs to be identified as an omission to be taken up by the OCB.

WG3 – Fire Engineers
Lead – Institution of Fire Engineers
Chair – Mostyn Bullock
Secretary – Neil Gibbins
1st Meeting – 8 August 8 (The Group had originally combined forces with WG1 to avoid duplication)
Meetings to date - 3
Organisations directly engaged: 15

Progress to date

47. Following progress made by WG1 (engineers), the first meeting of WG3 brought together 15 fire engineering professionals, with written contributions from a further ten people.

48. The group has agreed:

- The definition of fire engineering;
- The definition of a fire engineer within that context;
- A route to identifying when a fire engineer should, and must, be engaged in building work; and
- Key criteria to achieve appropriate professional standards, including CPD, codes of conduct and whistle-blowing policies.

49. The group is meeting to develop a response to the RIBA regarding the draft Plan of Works (fire safety). This is seen as critical as the process improvements identified in the "Hackitt" report infer that fire engineers must be engaged in relevant projects. The plan of work is the standard approach to identify other key safety injects and it is essential that fire knowledge is sought and deployed at the correct stage.

50. Fire engineers are also engaged with WG 1 (engineers), as the approach to competence is encompassed by the Engineering Council rules and principles.

WG4 – Fire Risk Assessors
Lead – Fire Sector Federation
Chair – Dennis Davis
Secretary – Stephen Adams
1st Meeting – 16 July 2018
Meetings to date - 2
Organisations directly engaged: 39

Progress to date

51. Two meetings have been held – on 16 July and 10 September – attended by 17 and 18 people respectively. 39 individuals and groups are on the WG4 circulation list. UKAS and MHCLG are directly engaged.

52. The group has reviewed competencies required by Fire Risk Assessors for HRRBs. Initially this has been based on Fire Sector Federation Competency Council specifications, from 2012. It is now seeking to develop a single overarching competence requirement to unify tasks, processes and manage risk.

53. Lengthy discussions have been ongoing about the definition of HRRBs. It has been agreed that initially the work should focus on the "Hackitt" Review definition, but that the group should encourage CSG to promote a wider definition for the future.

54. Categorisation of risk and required level of competence are seen as major issues.

55. WG4 has agreed its terms of reference as:

"To develop and prepare to introduce a method for demonstrating or proving competence for fire risk assessors including those undertaking work on higher-risk residential buildings."

56. The group has identified a need for third party certification of fire risk assessors; although definitions would be difficult as there so many variables of use, occupants, ownership etc.

57. The group has also identified a need to reach agreement on a single, verifiable register for end-users.

58. There is a need to promote and advocate mandatory requirements for fire risk assessors in high-risk premises.

WG5 – Fire Safety Enforcement Officers
Lead – National Fire Chiefs Council [NFCC]
Chair – Adreena Parkin-Coates/ Jenni Seex
Secretary – Penny Pender
1st Meeting – 11 September
Meetings to date - 3
Organisations directly engaged: 20

Progress to date

59. The second meeting of WG5 was held on 8 October 2018.

60. The group has agreed a number of key actions including carrying out a review of whether current fire safety national occupational standards are fit for purpose. Where change is required this will be recommended to the NFCC.

61. It was agreed that all fire safety officers involved in HRRBs would require third party accreditation, which would be seen as best practice for all other Inspecting Officers who regulate complex buildings. The group will discuss the general principles at the next meeting.

62. WG5 agreed the inclusion of ethical standards in the competency framework although recognised that this will require to be discussed with the Fire Standards Board in due course.

63. Definitions, roles and requirements for fire safety enforcement officers were discussed and agreed.

64. The group has also raised the key issue of clarification on whether competency of fire safety enforcing officers should be governed by Dame Judith Hackitt's proposed Overarching Competence Body, and how this might sit with the work of the newly-formed Fire Standards Board. The group suggested that the most appropriate structure for an overarching body needs to provide context to the governance of competence for public sector stakeholders where mechanisms already exist.

65. This is particularly necessary given that the revised Competency Framework for Business Fire Safety Regulators will be submitted to the Fire Standards Board to be issued as a standard in due course. The Competency Framework will become the standard for all fire and rescue services.

66. Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services will review compliance of fire and rescue services with standards set by the Fire Standards Board.

67. A further level of scrutiny for competency of fire safety enforcing officers would need to be justified.

68. Members of the Steering Group agreed that this is an area where discussions between the MHCLG and the Home Office, and an appropriate steer, would be useful.

WG6 – Building Control/Building Standards Inspectors
Lead – LABC
Chairs –Wayne Timperley (replacing Lorna Stimpson)
Deputy Chair – Martin Conlan
Secretary – Dan Falchikov
1st Meeting – 28 June 2018
Meetings to date – 6
Organisations directly engaged: 12

Progress to date

69. The sixth meeting, which took the form of a workshop, was held on 24 September.

70. The group has agreed to an outline competence standard, having considered the variety of models available. The Group has agreed to adopt the following broad themes in order to follow the Engineering Council competency framework:

- Knowledge and understanding;
- Assessment of design and development of processes, systems, services and products;
- Responsibility, management and leadership;
- Communications and interpersonal skills; and
- Professional commitment

71. Additional work is required to compare and contrast the various competency descriptors used by the professional bodies that typically include building control inspectors/surveyors as members, as well as those by associated professions.

72. The group has reviewed the general principles of what should be included in the competency framework text. It will be considering those activities that should be included as requiring measurement/assessment at the next meeting.

73. WG6 remains committed to developing a competency framework that will address the various levels/roles that tend to exist within the building control profession, namely:

- Assistant Building Control Inspector/Surveyor
- Building Control Inspector/Surveyor
- Senior Building Control Inspector/Surveyor

74. This will assist with embedding sufficient flexibility to enable adaptation to cover the measure of competency to include work outside of HRRBs, which is a direction of travel advocated in *Building a Safer Future*.

75. UKAS has attended a meeting to advise how they can assist with a competency system. MHCLG representatives will also attend a future meeting.

WG7 – Building Designers/Architects
Lead – Architects Registration Board
Joint Chairs – Richard Parnaby/ Nabila Zulfiqar
Secretary – ARB Secretariat
CSG member – Simon Howard
1st Meeting – 7 September 2018
Meetings to date - 2

Organisations directly engaged - 10

Progress to date

76. The working group has met twice since its inception and has set its terms of reference to create a competence framework for architects/designers working on HRRBs and has begun developing an outline of the framework. WG7 will endeavour to ensure that its framework can be matched against the frameworks being used by other working groups, particularly WG1 (engineers) and WG6 (building control/building standards). This will hopefully assist with alignment and comparison at a later stage of the process.

77. The group has reached the preliminary view that any framework required should be sufficiently robust to assure the competence of an architect/designer acting as principal designer, no matter what the eventual definition of an HRRB is.

78. It is likely that the framework will assume a base level of life-safety design competence of those already affiliated to an appropriate regulatory or professional body. The framework will therefore focus on those additional competences required for an architect/designer to assume the role of 'principal designer' on an HRRB.

79. WG7 has identified a number of concerns about the wider review being undertaken.

80. In particular, WG7 considers that it is not ideal to try to set competencies for designing HRRBs when the definition of an HRRB is unclear. Furthermore, the development of competency-based reserved activities espoused in the "Hackitt" Review does not sit well with the established regulatory framework in existence in the UK, which is based on the quality of work rather than the competency of the individual. The imposition of regulation in relation to such a narrow section of the construction sector creates the risk of the industry response being seen as piecemeal and partial.

81. Nonetheless, WG7 is confident in being able to deliver the objective. It is scheduling meetings every 4/5 weeks.

WG8 – Building Safety Coordinators [previously Building Safety Managers]
Lead – Independent
Chair – Anthony Taylor
Joint Secretariat – Sofie Hooper and Jon O'Neill
1st Meeting –13 July 2018
Meetings to date - 4
Organisations directly engaged - 22

Progress to date

82. This group began with a clean sheet of paper and has set about defining roles and competences. MHCLG representatives have also attended three of the group's workshops and have supported its debates and decision-making process.

83. The group has identified and defined different roles and responsibilities for those involved in the ownership and operation of buildings.

84. The CSG has accepted these new titles and definitions and has agreed to refer to the Building Safety Manager as **Building Safety Coordinator**.

85. WG8 has come up with a number of recommendations:

- Establishing a Fire and Emergency File (FEF) – the draft consultation paper is attached as Annex C. It is proposed that the FEF should form part of the Safety Case and should be a requirement that is set out in primary legislation;
- The FEF has listed a number of documents that WG8 recommends are defined in primary legislation:
    - Fire Policy
    - Base-Build/Design Stage Fire Strategy
    - Fire Safety Strategy
    - Fire Risk Management Strategy
    - Fire Safety Manual
    - Fire Log Book
    - Fire Risk Assessment [FRA]
- Design Phase(s) Fire Risk Assessment(s)
- Construction Phase FRA
- Pre-Occupation Fire Safety Assessment
- Alteration FRA
- Fire Risk Assessment Review;
- A new task-and-finish group should be established to agree the definitions of the above documents;
- The FEF should have as taxonomy prescribed in secondary legislation;
- A National Electronic Database should be established to hold all FEFs (similar to the EPC database);
- Recommendations for the structure and format of how the owner (dutyholder), Building Safety Coordinator, (formally Building Safety Manager) and occupiers interact, and how their roles can be managed in law and in practical terms – a consultative paper has been issued and is attached as Annex D;
- That each individual property with any residential accommodation should be provided with a licence defining the 'class' of property;
- An individual role should be created for the 'Building Safety Coordinator' (BSC) and that these individuals will need to hold a 'permissioning licence', similar to a driving licence, which sets out 'classes' of building types/occupancy within which the individual is deemed competent to undertake their overall safety co-ordination role;
- Those who operate residential accommodation should be licensed;

- That the owner/landlord of residential property should be required to make an application for 'Dutyholder' licence to the JCA; and the JCA would then grant the licence having deliberated that the applicant is 'fit and proper' to hold the licence;
- That there should be a form of 'Residents' Charter', to have obligations on the three key parties (individuals living at an address [rather than their name being on any lease], the 'Dutyholder' and the 'manager of the property', the BSC); and
- The knowledge of occupiers to be upgraded by the issue, and regular reissue, of Public Service Broadcast 'basic fire and safety in residential buildings' films/videos /brochures etc.

86. WG8 has acknowledged that some of its concepts are complicated and need further work on simplifying their messages.

87. The Steering Group is intending to hold an open meeting bringing in all the chairs and secretaries of all the working groups to focus on these recommendations.

WG9 – Site Supervisors
Lead – Chartered Institute of Building
Chair – Peter Dawber
Secretariat – Lyndsey Montgomery
1st Meeting – 9 September 2018
Meetings to date - 2
Organisations directly engaged - 10

Progress to date

88. The group proposed the following idea for wording regarding the overall competence for a Site Supervisor: *"In proportion to the risk arising from the complexity of the works, the Site Supervisor should identify and lead the competent individuals to ensure compliance with client's requirements and statutory regulations and to manage conflicts of interest".*

89. Discussion followed regarding whether the site supervisor should be 'designed' as a 'manager' of the process of building or rather as a 'judge' of what has been/is being built.

90. Calling Site Supervisors a 'Principal Supervisor' may make it clearer that it is not just a 'site manager' but has a role in signing off on the quality of the build.

91. In order to prevent the Principal Supervisor being seen as somehow subordinate to the contractor, the Principal Supervisor would be appointed by the client and would, therefore, not be subordinate to the contractor. It would function rather like a Clerk of Works. This will be similar to what happens under CDM17, with the Principal Designer, so the precedent is already in place.

92. The Principal Supervisor's remit, from the client and independent of the main contractor, would be to manage the reports from the various work packages and forward them to the client as satisfactory (or not).

93. They would need to be appointed before the works begin on-site, at the design stage. The role could be undertaken by anyone involved in the construction process if they take on the additional competences and accreditation of the 'Principal Supervisor'.

94. The competence of the 'Principal Supervisor' will need to be accredited beyond their Professional, Statutory and Regulatory Body (PSRB) membership. This may not be something that all bodies are currently set up to do either logistically or with regards to risk management. It could also restrict the role to members of particular PSRBs, which is not appropriate given that the role will have its own competences that could be met by any professional with appropriate training and subsequent accreditation.

95. The Principal Supervisor will need to know what information to request from other professionals involved in the project in order to do their job appropriately. This would be the case throughout the build, to ensure subsequent work packages do not invalidate the 'sign-off' of previously completed sections. This is key, given the accountability of the Supervisor.

96. This kind of role is already in place with non-traditional buildings such as pre-cast concrete where lenders will only give a mortgage if the entire work has been overseen and signed off, with accountability, by the specific 'inspector'.

97. The group noted that the Golden Thread is not mentioned in the CSG remit and felt that this needs to be added in to avoid 'siloes' and create a more holistic approach to building HRRBs. The idea of coordination across the piece in creating a building is key to making sure all safety features are in place and functioning throughout the lifecycle of a building; the essence of the Golden Thread. It makes sense to have the Building Safety Manager maintain this Golden Thread, meaning that this is created as an enhanced role. The Principal Designer will sign off on the works overall and the building continue to be managed thereafter by the Building Safety Manager. This issue probably ought to be raised with the overall Steering Group as it has implications for future actions.

98. Discussion then moved on to how group members felt the recommendations from the Industry Response Group (via the Working Groups) might be applied to members across the world, via their membership of UK-based PSRBs.

99. The group noted that the outcome will not apply in exactly the same way across the Four Nations and their various Governments and jurisdictions. Scotland, for example, has their own recent reports on building safety and is also separately developing a more holistic approach to managing construction quality.

100. It would be difficult to make the role of Site Supervisor or 'Principal Supervisor' based entirely on a person's membership of a professional body when many different professions may be represented within a professional body and members may live and/or work in many countries/jurisdictions. Making it more like a 'licence/registration' or certification which is assessed regularly, allows individuals to undergo registration only if that makes sense to their working environment and opportunities, and will not if it does not. It would be additional to their overall PSRB membership, not part of it.

101. The Group suggested that bullet point 4 on 'Competence for Building a Safer Future' be altered to better reflect the fact that this can only apply within the UK (also subject to the legal framework of the devolved nations), at the moment.

102. The Group's principal recommendation is therefore:

To create a new role of Principal Supervisor to take control of the production phase of a construction project and to give overall sign-off of the construction works at handover.

103. The group considered how the Site Supervisor is responsible for making the design into a construction and doing so according to the specifications. They must mediate the relationship between the designer of the building and the constructors of that building. They must make sure that the quality of the build is as designed and specified.

104. Principal Supervisors will need to have the authority to ensure this can happen and also there should be accountability and reassurance built into the system.

105. This would require a change to rules in the same way as CDM Regulations required creation of CDM Coordinator, now replaced by Principal Designer.

106. Implementation would add to costs of production due to time required and legal framework of the accountability of the Principal Designer (suggested sign-off wording is given in Annex E)

107. Further work would be required to ensure all other trades/professions had competences in provision of the information required by the Principal Designer to facilitate sign-off.

WG10 – Project Managers
Lead – Royal Institution of Chartered Surveyors
Chair – Prof. Charles Egbu
Secretary – Steven Thompson
1st Meeting – 27 July 2018
Meetings to date – 3
Organisations directly engaged: 11

Progress to date

108. WG10 has met on three occasions to date: 27 July, 6 September and 4 October 2018.

109. The group has considered the definition of Project Manager and the related definition issues around the use of the word Project Management.

110. The group has given consideration to the definition of HRRBs in this context but has agreed that this needs to be centrally agreed.

111. The group has reviewed existing competency frameworks for Project Managers, using various existing sources (both in the UK and internationally). It has distilled these frameworks to provide a baseline for competence. Members have begun looking at how working on an HRRB differed for a project manager compared to other projects and has used the RIBA plan of work to map that.

112. The group has also looked at how the role of a project manager might be different for refurbishment work on HRRBs. It is now looking at how PMs are accredited and is mapping out what already exists.

WG11 – Procurement
Lead – Chartered Institute of Procurement and Supply
Chair – Duncan Brock
Secretary – Lauren Williams
1st Meeting – 26 September
Meeting to date: 2
Organisations directly engaged: 24

Progress to date

113. The group is using the CIPS Global Standard as a baseline for developing a competence framework and reviewing other competency frameworks, including those from RIBA and CIOB. Members of the CIPS construction procurement leadership team have joined the group and going forward there will also be representation from RICS, CIOB and RIBA. Around 20 organisations have expressed interest in joining with this work.

114. The Group has agreed Terms of reference, as follows:

"*To agree specific procurement competence levels, and measures of competence, for people involved in all aspects of sourcing, tendering,*

contracting and contract management of suppliers and resources involved in:

- *The construction of new HRRBs;*
- *Delivering the ongoing services, refurbishment, retrofit, maintenance and repairs for all HRRBs*

115. Duncan Brock, who is chairing the group, has said that one of the key challenges is to ensure that there are also high standards applied to procurement through the supply chain; procurement does not just refer to clients and tier one firms.

116. WG11 is also endeavouring to make appropriate links with other work looking at procurement within government and industry; in particular, work being undertaken by the Construction Leadership Council, led by Ann Bentley (Peter Yates – joint deputy chair of the CSG is also involved with this and will act as a link between the two workstreams); and work being developed on procurement within MHCLG.

WG12 – Products

Lead - Construction Products Association
Chair – Peter Caplehorn CPA
Secretary - Hanna Clarke
First meeting – 16 October
Meetings to date – 3
Organisations directly engaged - 21

Progress to date

117. This group has been assembled after the other groups, but will convene fortnightly following on from the first meeting on 16 October. The draft objective of the group is to provide a competence standard for all those involved with design, specification, procurement, installation and maintenance of products.

118. The group acknowledges that the scope is necessarily wide but a logical approach is using the expertise of manufacturers to determine the core understanding needed by industry in future.

119. The draft scope is not be limited to fire-related products, nor just focused on HRRBs. It is intended that a plan of work and objectives will be drawn up by the next meeting.

120. WG12 considers it vital to coordinate its work with that of the other 11 groups and is intending to invite periodically the chairs of other working groups to its meetings. The first such meeting is on 28 November.

Cross-cutting activity and coordinating work across the groups

121. The Steering Group has been fostering communication and collaboration between the different working groups. Amongst other developments, this has opened dialogue between WG1 and WG10 and WG8 to do with trial projects for its safety case.

122. Greater sharing of ideas and approaches has also been encouraged by holding an open meeting, which brought all the chairs and secretaries together, on 3 October; at which three of the working groups presented their ideas (WG1, WG4, WG8) and Peter Yates presented a paper on the Principles of Competency, which was followed by a free-flowing discussion.

123. Malcolm Hynd, external affairs manager at the national accreditation body, UKAS, attended as an observer. A number of the working groups will be meeting with UKAS to discuss accreditation systems (as detailed in the WG progress report).

124. The Steering Group will continue to organise meetings of the chairs of working groups to further enable sharing of ideas and communication of activity and plans. The Steering Group is planning another open event on 29 November, where a focus will be on the recommendations put forward by WG8 for wider consideration.

125. One of the recurring themes of meetings has been the need to draw up guidance across areas that are common to all the groups. This approach was seen as having two main benefits: reducing duplication, and also binding the groups together in taking a common approach.

126. Specific areas that have been identified by the Steering Group are around ethical behaviours, CPD, and the need to devise a learning model covering the basics of fire science, which was proposed by fire sector members as a key foundation stone for all those involved in HRRBs.

127. At the open meeting held on 3 October, it emerged that there is also the need for cross-cutting themes to establish precise definitions for roles and technical terms that could be used in law to ensure universal standards. There may be other areas yet to be specifically identified where a cross-cutting approach would prove to be the best way forward.

128. The Steering Group intends to pursue these cross-cutting themes, but acknowledges that some research activity is required, which will require additional resourcing. Working groups are concentrating on establishing technical competences and are strongly of the view that progress could be made faster if the research needed to draw up some of this cross-cutting activity could be carried out by a full time secondee, or other type of researcher.

129. This is an area in which further discussion with MHCLG is required.

The Principles of Competence

130. As reported in the first quarterly report, establishing common principles of competency began with a workshop on 20 June, arranged by LABC and facilitated by Professor Angus Law of Edinburgh University.

131. The outcomes of this workshop were taken forward by a small task-and-finish group, chaired by Peter Yates of the Local Government Association, the joint-deputy chair of the CSG, established at the meeting of the steering group, on 28 June.

132. The subsequent drafts produced by Peter Yates' small group have been discussed at several consecutive Steering Group meetings. They have now been agreed with the proviso that they may be revisited as the legislative landscape becomes clearer. At this stage all agreed they should be made available to provide a foundation to the working groups. The final draft wording of the Principles of Competency is attached in Annex A.

133. Some further updating to the Principles of Competency is required to reflect discussions with UKAS.

Memorandum of Understanding

134. The CSG has drawn up a Memorandum of Understanding, which is available for signing by all organisations involved in this work. The MoU is attached as Annex F.

135. It has also been agreed that any organisation that is unable, for operational or Governance reasons, to sign the MoU, will not be excluded from their current role in the CSG or WGs in taking activities forward.

136. At the date of submitting this report, the following organisations have agreed to signed this MOU:

- British Institute of Facilities Management
- Chartered Institute of Building
- Chartered Institute of Purchasing and Supply
- Construction Industry Council
- Construction Products Association
- Fire Sector Federation
- GVA
- Institution of Fire Engineers
- Managing Agents Property Health and Safety Forum
- Royal Institution of Chartered Surveyors

137. It is envisaged that the signatories to the MoU will become the first Members of the Company Limited by Guarantee.

Other activity

138. The CSG is considering the report *In Plain Site*, published in October by the Institution of Civil Engineers, which seeks to identify the lessons which civil engineers and other UK infrastructure professionals can learn from the Grenfell Fire. It has been written by Professor Peter Hansford, chair of construction and infrastructure policy at the Bartlett School of Construction and Project Management of University College London.

139. Working groups have been holding discussions with the RIBA regarding its fire safety overlay for the RIBA plan of work (a universal document in construction contracts for establishing work stages). This important document has recently been issued for consultation.

140. Members of the Steering Group have agreed to make contact details available to each other and to the Local Government Association, which has specifically requested this information. We are also contacting all the working group chairs and secretaries to get their agreement for this information to be shared.

141. At each meeting, the steering group is regularly reviewing other relevant activity and is currently unaware of any competence enhancement activity in relation to HRRBs which is not taking place within the envelope of this work.

Community of Interest

142. The RICS has enabled the Steering Group to set up a secure digital online community in order to be able to share documents confidentially (to include the Chairs and Secretariats of the various working groups) and as a central repository of all relevant documentation. This is now operational and all papers are uploaded to this site.

Summary of progress against recommendations and proposals

143. As we set out in the first quarterly report, working groups have been established to develop and deliver the key recommendations in *Building a Safer Future* with regard to competence, specifically to:

(a) *Continue to work together to develop a new common approach and competence framework which meets the requirements of the new regulatory framework and the new skills required of Building Standards Inspectors;*
(b) *develop a robust, comprehensive and coherent system for the competence requirements for the role of those operating and owning buildings. [Note:*

that we are now referring to the role of building safety manager of HRRBs as Building Safety Coordinators;

(c) *deliver a programme of fire and system safety-related CPD;*

(d) *develop a contextualised standard for chartered and incorporated engineers working on HRRBs;*

(e) *agree a comprehensive and coherent framework for assuring competence levels for those installing and maintaining fire safety and other safety critical systems for HRRBs, and any enhanced levels of competence that may be necessary;*

(f) *develop and introduce an enhanced level of competence for fire risk assessors undertaking work on HRRBs;*

(g) *ensure that fire and rescue services comply with the Competency Framework for Business Safety Regulators; and*

(h) *consider current and future competence levels of those architects on the Register of Architects, and those joining the Register, in relation to the fire safety design issues specifically relating to those architects involved in designing HRRBs.*

144. The working groups bring together organisations from across the spectrum of design, engineering construction, fire safety and building owners/managers. The ten original working groups have now expanded to twelve, with an additional working group for procurement and one for products.

145. All working groups have been established and have now begun a programme of work to identify and establish the appropriate competency frameworks, with some being further advanced than others. The installers group (WG2), for example, which has a large constituency, has been reviewing qualifications and standards in place for passive and active fire systems. It will meet on 9 November to start to identify where gaps may exist.

146. Overarching principles of competency have been drawn up and agreed by the Steering Group.

147. The CSG has agreed to set about establishing the Overarching Competence Body over the next quarter as a Company Limited by Guarantee so that it is in a position to inherit the baton of this ongoing work in May 2019. The Governance of this CLG can be amended to take account of other aspects of the implementation of the "Hackitt" recommendations – including those by legislation – in due course.

148. The CSG's programme is to deliver a coherent proposal to government in **April 2019**, inside the required target of one year; with the third quarterly report on progress to be submitted by the end of January 2019.

Specific Issues to be drawn to the attention of the MHCLG

A. Clarify MHCLG view on the future reporting structure of the CSG – to the ISSG or to the IRG, or both?

B. Consideration of the possible external confusion between the Joint Competent Authority and an Overarching Competence Body.

C. Consideration of the proposal to establish the Overarching Competence Body as a Company limited by Guarantee during Q3.

D. Note the change of nomenclature from Building Safety Manager to Building Safety Coordinator

E. Consider the case for a change of nomenclature from Site Supervisor to Principal Supervisor

F. Give a steer on the various recommendations for legislative intervention to the building owner processes from WG8

G. Provide a view on what is meant by a 'whole building'.

H. Include in the Implementation Plan the overarching aims for improving competences so that the CSG can ensure that its aims and work to date are effectively aligned with these intentions.

I. Consider the funding of a full-time research officer to assist with areas of work that cannot be resourced by the CSG members.

Submitted on behalf of the Competence Steering Group

Graham Watts OBE,
Chair IRG Steering Group on Competences for Building a Safer Future

15 November 2018

INDUSTRY RESPONSE GROUP

Steering Group on Competences for Building a Safer Future

Annexes

Second Quarterly Report
on progress towards meeting the recommendations
on competences in Dame Judith Hackitt's Independent Review of Building Regulations and Fire Safety

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Annex A – Draft Principles of Competence
Annex B – Potential types of entity for the Overarching Competence Body
Annex C – Consultative Paper regarding the Fire and Emergency File
Annex D – Consultative Paper on the interaction of Building Owner, Building Safety Coordinator and occupiers
Annex E – Suggested sign-off wording from WG9
Annex F – Memorandum of Understanding
Annex G – Organisations directly engaged with the CSG and WGs

July - October 2018

Principles of Competency

This note summarises the common principles of competency that were agreed by the IRG Steering Group and Competency Working Group representatives during a seminar on the 20th June 2018.

The text has been further developed by representatives of the groups to encompass all those involved in the procurement, design, delivery, assessment, commissioning, management and maintenance of higher-risk residential buildings (HRRBs).

Goal:

To ensure that all those individuals engaged at every stage of the life cycle of HRRBs and responsible for carrying out work that impacts safety*, have the proven competence to do so.

**(Note: including fire safety; access and ability for fire-fighting; structural safety; and building, operational and user safety throughout the design, delivery and occupation (management and maintenance) of an HRRB).*

Definitions:

In the context of this document and pertaining to all functions associated with the procurement, design, delivery, assessment, commissioning, management and maintenance of HRRBs throughout their full lifecycle, to include new build, refurbishment, retrofitting and maintenance work:-

> ‘Competence’ is the combination of skills and knowledge that enables a person to make informed decisions and carry out a defined task.

> ‘Competencies’ are the particular skills and knowledge of an individual, that may be applied personally or collectively as part of a team.

Principle 1 – Core set

The assessment of competence requires a defined core set of competencies that are capable of being demonstrated and evaluated in a consistent, objective manner. The adequacy, or otherwise, of the competencies should be judged by other recognised members of the same group with the input of other relevant stakeholders as necessary.

Route forward:

Each professional, trade or skills body will define the activities that make their body unique, and over which they have primacy.

Each body will define the competencies that are unique to that activity – and over which only other members of that body can assess adequacy.

Principle 2 - Expectation

In order to perform their role effectively, each member of the team is entitled to expect specific competencies from other members.

Route forward:

Each professional, trade or skills body or, where appropriate, collection of bodies, is to identify the other bodies with which they interact.

Each body will identify the competencies that they require of those other bodies (in order that they can competently fulfil their own role).

Principle 3 – Assessment

Recognition of competence follows assessment by a professional or regulatory body/ trade registration body/ qualification scheme/ certification scheme/ recognised testing regime.

The process by which an individual or organisation is assessed and recognised should be relevant to the role they are undertaking and provide consistent, objective evaluation.*

**(Note: in due course the Working Groups will establish a comprehensive list of recognised bodies).*

Route forward:

Each professional, trade or skills body will determine how the assessment and recognition of competence is carried out in the sector for which it is responsible.

In order to ensure equivalence of outcomes, the process developed by each body for assessment and recognition will be agreed by the *Overarching Competence Body* (OCB).

Principle 4 – Ethics

Irrespective of the specific competencies associated with a professional, trade or skills body, all those involved with the procurement, design, delivery, assessment, commissioning, management and maintenance of HRRBs have agreed a set of overarching ethical principles as follows:

Respect for life, law, the environment and public good

All those involved in the procurement, design, delivery, assessment, commissioning, management and maintenance of Higher-Risk Residential Buildings have a duty to obey all applicable laws and regulations and give due weight to facts, published standards and guidance and the wider public interest.

They should:

- hold paramount the health and safety of others and draw attention to hazards
- ensure their work is lawful, ethical and justified
- recognise the importance of physical and cyber security and data protection
- respect and protect personal information and intellectual property
- protect, and aim to improve, the quality of built and natural environments
- maximise the public good and minimise both actual and potential adverse effects for their own and succeeding generations
- take due account of the limited availability of natural resources

Honesty and Integrity

All those involved in the procurement, design, delivery, assessment, commissioning, management and maintenance of Higher-Risk Residential Buildings have a duty to uphold the highest standards of personal and professional conduct including openness, honesty and integrity.

They should:

- act in a reliable and trustworthy manner and treat others with equality and fairness
- be alert to the ways in which their work and behaviour might affect others and respect the privacy, rights and reputations of other parties and individuals
- respect confidentiality
- declare and manage conflicts of interest
- avoid deception and take steps to prevent or report corrupt practices or professional misconduct
- reject bribery and improper influence

Accuracy and Rigour

All those involved in the procurement, design, delivery, assessment, commissioning, management and maintenance of Higher-Risk Residential Buildings have a duty to acquire and use wisely the understanding, knowledge and skills needed to perform their role or task.

They should:

- always act with care
- perform services only in areas in which they are currently competent or under competent supervision
- keep their knowledge and skills up to date
- assist the development of knowledge and skills in others
- present and review theory, evidence and interpretation honestly, accurately, objectively and without bias, while respecting reasoned alternative views
- identify, evaluate, quantify, mitigate and manage risks
- not knowingly mislead or allow others to be misled

Responsibility for Direction, Conduct and Communication*

All those involved in the procurement, design, delivery, assessment, commissioning, management and maintenance of Higher-Risk Residential Buildings have a duty to abide by and promote high standards of personal conduct, communicate clearly and provide direction as appropriate, setting the example for others to follow.

They should:

- be aware of and seek to effectively communicate the issues that the built environment raises for society
- communicate unambiguously and openly to avoid misinterpretation
- promote equality, diversity and inclusion, and respect the views of others
- promote public awareness and understanding of the impact and benefits of new areas of learning, achievements and innovation in industry.
- be objective and truthful in any statement made in their personal or professional capacity
- challenge statements or policies that cause them personal or professional concern

**(Note: 'Responsibility for Direction, Conduct and Communication' is a working title replacing the original title of 'Leadership and Communication' taken from the Engineering Council's 'Statement of Ethical Principles', on which this document is based. The change was made to reflect the diversity of skills/ backgrounds and inputs of the wider HRRB team, in recognition that not all members will be in management or leadership positions. Similarly the addition of the word 'personal' in the main body of the text has been added for those whom would not otherwise associate with the title of 'professional'.*

8th MEETING OF THE
INDUSTRY RESPONSE GROUP STEERING GROUP ON
COMPETENCE FOR BUILDING A SAFER FUTURE

OPTIONS FOR THE LEGAL ENTITY & STRUCTURE OF THE OVERARCHING BODY

1. The Steering Group is tasked with determining the:

   '…role and remit of an overarching body to provide oversight of competence requirements and support the delivery of competent people working on HRRBs, including:

   - *The professional bodies, professions and disciplines in scope;*
   - *Its membership and governance…….. (etc)'*

2. The purpose of this paper is to analyse some options for the legal entity and structure of the overarching competence body (OCB).

3. At the second meeting of the Steering Group, a paper was received – prepared by Fladgate LLP – identifying the various company types. This is attached as Annex A, for ease of reference.

4. The Steering Group agreed that an options analysis paper should be prepared for discussion and various possible models have been discussed at both the steering group and in between steering group meetings. Discussions have also been held with the MHCLG implementation team responsible for competences; the Sports Grounds Safety Authority; and UKAS.

5. The product of these discussions is a selection of six possible models, some of which are closely aligned. In each case, I have identified an example of the type of body being suggested so that realistic comparisons can be made.

6. The six models fall into three categories:

   Option 1 – statutory bodies
   Option 2 – private industry-led bodies with statutory authority
   Option 3 – private industry-led bodies

7. The six options are identified below and are discussed in more detail later in this report.

8. The six options – and examples – are:

   Option 1a – A statutory board – example: Architects' Registration Board;

Option 1b - An "arm's length" statutory body – example: Sports Grounds Safety Authority;

Option 2a – A private company limited by guarantee but designated for a particular purpose by the Secretary of State under a statutory instrument – example: CICAIR Ltd;

Option 2b – A private company limited by guarantee but with a Memorandum of Understanding with government to carry out a particular function – example: UKAS;

Option 2c – a private company limited by guarantee incorporated by Royal Charter and a National Body recognised by government with an exclusive purpose – example: BSI;

Option 3a – A private company limited by guarantee owned and governed by its members – example: CIC.

[Plus – to be explored – potential Option 3b – A charitable trust].

9. Each of these models – apart from 3b, which is covered in the annex - is briefly examined in more detail below.

<u>Option 1a: A statutory board – example: Architects' Registration Board</u>

10. Established by Parliament in the Architects Act 1997 (succeeding a former body, ARCUK, which had been formed in the 1930s).

11. The duties of ARB are:

- Prescribing the qualifications needed to become an architect;
- Keeping the UK Register of Architects;
- Ensuring that architects meet standards for conduct and practice;
- Investigating complaints about an architect's conduct or competence;
- Making sure that only people on the ARB Register offer their services as an architect; and
- Act as the UK's competent authority for architects

12. Currently the ARB is overseen by a Board of 15 members: seven are architects elected by the profession; eight are lay members who are appointed by the Privy Council.

13. This is about to change to a Board of 11 members, comprising an independent non-executive chair; five members who are architects and five lay members.

Option 1b: An "arm's length" statutory body – example: Sports Grounds Safety Authority

14. The Sports Grounds Safety Authority was established – initially as the Football Licensing Authority - in the aftermath of the Heysel Stadium disaster (1985). It was initially intended to cover every sports ground with a seating capacity of 10,000 plus.

15. However the legislation was shelved in the light of the Hillsborough disaster and not enacted until after Lord Justice Taylor's inquiry (1989) , it was made specific only to football stadia. Its remit extends to the 92 football grounds in the four major leagues plus Wembley and the Millennium Stadium, in Cardiff.

16. It is an arms-length statutory body established by the Football Spectators Act 1989, and confirmed in the Sports Grounds Safety Authority Act 2011. It is the '*UK Government's expert body on safety at sports grounds*.'

17. The SSGA has statutory authority in England and Wales only.

18. Although its statutory role only applies to regulating local authorities in their oversight of safety in the 94 football grounds, in scope, it provides an advisory role to other sports grounds both in the UK and internationally.

19. Its role includes:

    - Writing guidance, including the Guide to Safety at Sports Grounds (the "Green Guide"), which is updated every year and is an Approved Document;
    - Issuing licences to the 94 football stadia in scope;
    - Ranking LAs on their oversight of football stadia.

20. The Chair and a Board of eight members are appointed by the DCMS Secretary of State. The Secretariat is relatively small: a f/t CEO plus a couple of admin staff and nine inspectors.

21. The Budget is approximately £1m per annum with the majority provided by government. Football clubs – amazingly – pay only £100 per year.

Option 2a: A private company limited by guarantee but designated for a particular purpose by the Secretary of State under a statutory instrument – example: CICAIR Ltd

22. The MHCLG Secretary of State and Welsh Ministers have, with effect from 31 March 2014, designated CICAIR Ltd, with its consent, under section 49 of the Building Act 1984 and regulations 3 and 5 of the Building (Approved Inspectors etc) Regulations 2010, for the purpose of approving individuals and bodies corporate as inspectors

for the purpose of Part II of that Act. Prior to 31 March 2014, the designated body (since 1997) was CIC. The designation was conferred by a statutory instrument.

23. CICAIR Ltd is a wholly owned subsidiary of the Construction Industry Council and it is governed by a board of twelve non-executive directors chaired by an independent non-executive director. The membership of the Board is discussed with MHCLG but not specifically approved by the Secretary of State.

24. The purpose of CICAIR Ltd includes:

    - Overseeing the requirements for admission to the register;
    - Approving AIs for admission to the register;
    - Auditing their performance;
    - Re-approving every five years;
    - Maintaining a Register;
    - Maintaining a Code of Conduct for AIs;
    - Considering complaints against AIs; and
    - Implementing a disciplinary process

25. The budget of CICAIR Ltd is around £370,000 per annum, and it employs two full-time staff.

Option 2b: A private company limited by guarantee but with a memorandum of understanding with government to carry out a particular function – example: UKAS

26. UKAS is the National Accreditation Body, appointed under the Accreditation Regulations 2009. It assesses for compliance against criteria of competence (including international standards). It has a duty to act in the public interest and to be '*…commercially aware, but not commercially driven.*'

27. It was established by the DTI in 1985 as a private company limited by guarantee.

28. It operates with the authority of government under a Memorandum of Understanding, which is regularly renewed.

29. It acts under EU Regulation 765/2008 and provides a compliant legal framework for accreditation.

30. As a Company Limited by Guarantee UKAS is governed by seventeen member bodies (including six government departments or agencies)

Option 2c: A private company limited by guarantee incorporated by Royal Charter and a National Body recognised by government with an exclusive purpose – example: BSI

31. Another potential model of a similar type might be the British Standards Institution, which was formed in 1901 as the world's first national standards body and became incorporated by a Royal Charter in 1929 and 1931.

32. In 1942, the UK Government recognised BSI as the sole organisation for issuing national standards.

33. The BSI is governed by its Royal Charter and Bye-laws.

34. The Board of eight comprises a non-executive chairman, three executive directors and four non-executive directors.

Option 3a: A private company limited by guarantee owned and governed by its members – example: CIC

35. CIC is a private Company Limited by Guarantee, owned by 36 member organisations. They provide representatives to the Council which is the governing body of CIC, but the day-to-day management is vested in a Board of Directors, which contains a non-executive Chairman, one executive director and ten non-executive directors (six of whom are elected by the members, plus the chairman; and four of whom are appointed by the Board).

36. The guarantee of members is limited to £1.

37. A variation on this arrangement could be a company limited by guarantee with members represented in clusters.

38. The Considerate Constructors Scheme, for example, is a company limited by shares which is owned by a holding company limited by guarantee, representing just two member "umbrella" organisations.

39. A further option would be to consider becoming a charitable trust but this has not yet been explored.

Conclusion

40. Options 1a and 1b would require primary legislation but this may not be a significant obstacle given that the MHCLG and Home Office seem intent on introducing a Bill, implementing aspects of the Hackitt recommendations, to Parliament in 2019.

41. Options 2a, 2b and 2c would also require some legislative backing but would be less onerous in terms of future changes to requirements (fro example, the change of legal status for CICAIR Ltd, requiring a new statutory instrument, took only a matter of a few months, in 2014).

42. Option 2c would require the support of the Privy Council in the granting of a Royal Charter.

43. Option 3a could be translated into any of the options 1a, 1b, 2a, 2b and 2c once the company limited by guarantee had been established. The CLG could be translated into statute (1a/1b); designated (2a); and given authority through an MoU or by other means (2b/2c), subsequent to its establishment.

44. It is suggested that the Steering Group devote a meeting to a workshop involving presentations on possible OCB structures from relevant organisations.

The Steering Group is invited to discuss this paper and identify preferred options

Graham Watts
Chairman

18.09.18

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Fire & Emergency File

Prescribed Structure & Specification for:

Individual 'Whole Buildings'

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Introduction

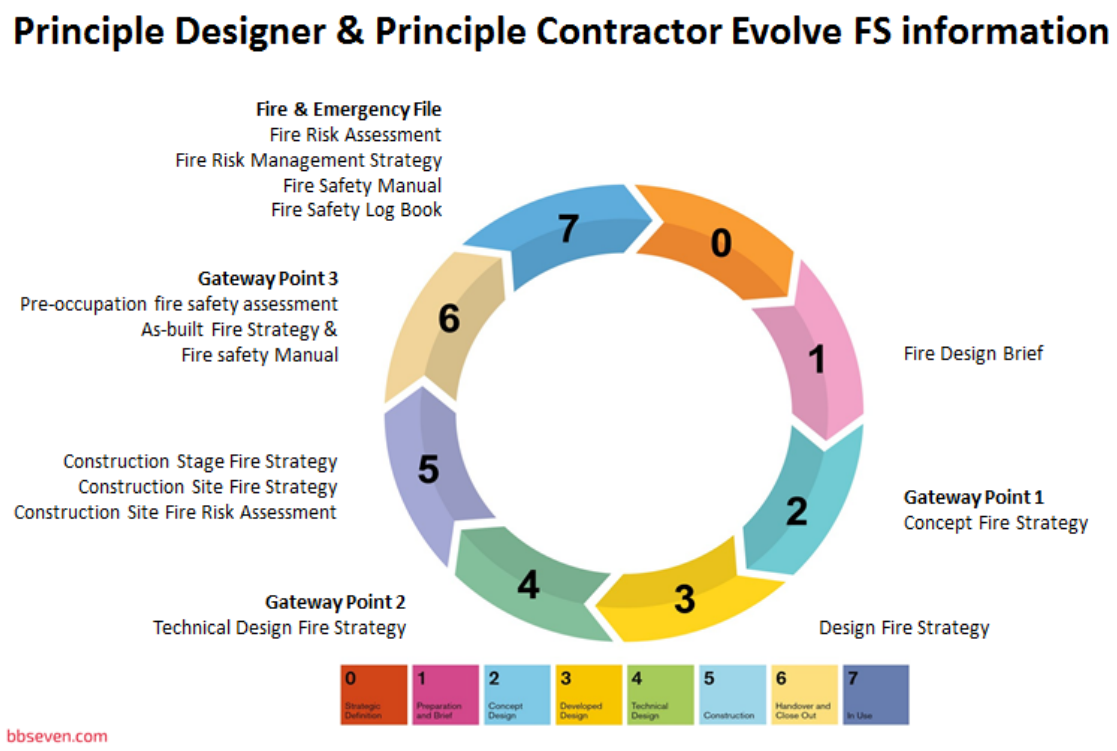
In order to ensure accurate Fire and Emergency related information, relating to each separate 'whole' building, is collated, maintained and updated it is required that a Fire and Emergency File (FEF) is created.

The Fire and Emergency File will form part of the information required to demonstrate the successful and safe management of all [define] multi- occupied residential properties, this could include buildings such as Universities, hospitals and other such institutional organisations..

The Fire and Emergency File will form part of the information required for a Safety Case review.

The information should include historic information, in order to provide an audit trail of changes made to the initial fire safety design intent, (the Initial Technical Design Fire Safety Strategy). Where changes are made to any files/documents, these are to be updated rather than layered one above the other [reword].

The collation of Fire Safety Information will evolve:



The collation of the information for a new build development will need to begin at the earliest RIBA Stage . It is important to identify the appropriate project outcomes. The design team need to define how success will be measured and achieved from a fire safety perspective. They need answers to all the following:

Is the brief for fire limited to life safety and minimum compliance or does it extend to property protection objectives, business continuity and resilience, due to client requirements and the use class of building?

Who will be responsible for fire safety on the project at each stage? Who signs off risk decisions / deliverables?

What deliverables are expected and who will produce them i.e. are specialist appointments required? This all needs to be captured in the responsibilities matrix at a very early stage so there is no ambiguity.

As shown in the infographic above, A concept fire strategy report will evolve through the design process being refined and expanded as the project progresses with a view to becoming an as built fire risk management strategy for use throughout the buildings life cycle. The final fire risk management strategy will satisfy chapter 2 in the fire and emergency file.

The Fire and Emergency File must be consulted and considered at the design stage of any refurbishment, or other 'small works', to ensure that the proposed works do not compromise existing Fire and Emergency arrangements.

The complete (or updates to,) the Fire and Emergency File are to be reviewed, signed-off and certified by a Competent Fire Engineer [A Chartered Professional with specialist knowledge, training and experience in fire safety'] as part of Practical Completion of a new build development or a refurbishment (where any changes have been made to the fire and emergency safety arrangements). These may include changes to passive fire protection (eg: compartmentation) or the active fire protection (eg: fire detection, or protection/suppression measures).

The Certified Fire and Emergency File for a new build development or significant refurbishment, is to be delivered as part of Practical Completion of the works, and before (re-) occupation and/or at Gateway 3, or RIBA stage 4

The responsibility for ensuring The Fire and Emergency File is maintained current at all times remains with the Owner (Duty Holder).

It is preferable that records are all maintained in electronic format. Whether electronic or hardcopy all Fire and Emergency Files are to be indexed according to this specification. It is anticipated that HMG will deliver a national database, similar to the EPC, to hold all Fire and Emergency Files.

The Illustration below indicates the importance of the Fire and Emergency File forming a part of the overall safety management arrangements for multi-occupied residential property:

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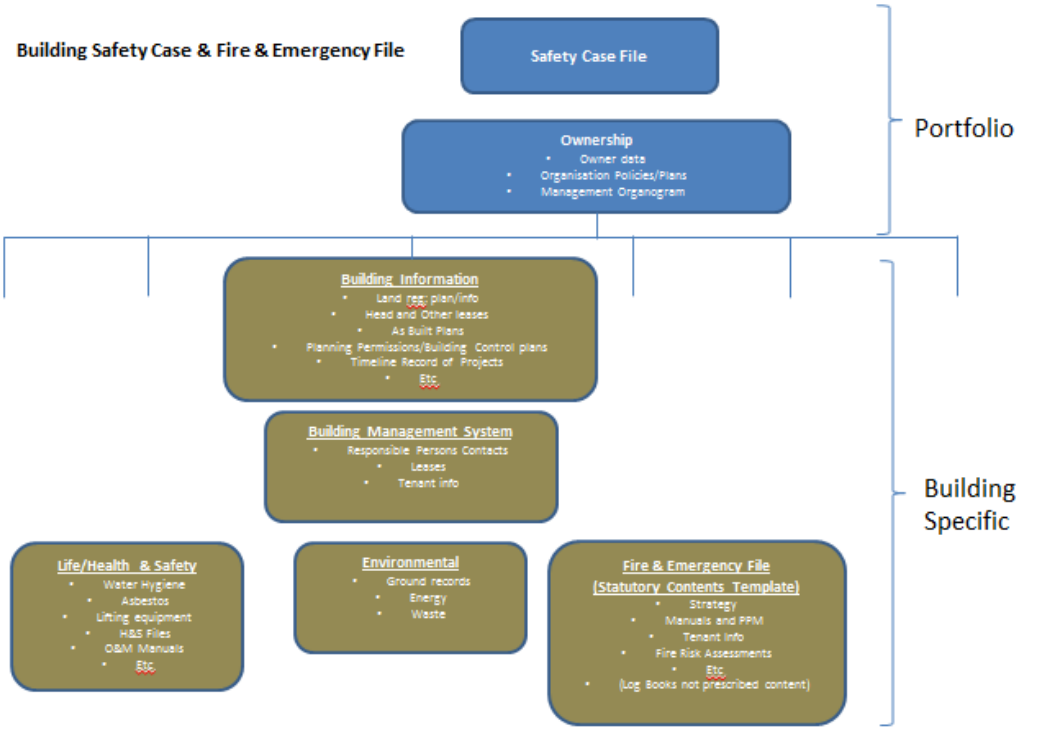

Definitions

Fire Policy - A fire policy is defined at the intentions and direction of an organisation, in respect of fire safety as expressed by its top management.

Base-Build/Design Stage Fire Safety Strategy – for meeting requirements of Building Regs and Gateway 1 (RIBA Stage 3/4?)

Fire Safety Strategy – Considered at Gateway 2, Delivered on Practical Completion and Gateway 3 (RIBA stage 6 or developed for existing stock).

Information which describes the fire safety issues within, (and if appropriate proximate to,) the property, and how they are addressed. It acts as a guide for the design team, by identifying standards or setting performance criteria. It is the basis of submissions to approving authorities i.e. Building Control Body and Fire Authority.

Note: A concept fire strategy report will evolve through the design process being refined and expanded as the project progresses with a view to becoming an as built Fire Risk Management Strategy for use throughout the buildings life cycle This would be assessed by way of design stage fire risk assessment(s).

Note: any significant refurbishment works would require consultation and consideration of the Fire Safety Strategy, and may require the Strategy (and Fire Risk

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Management Strategy) being updated if the original assumptions are conflicted or compromised.

Fire Risk Management Strategy - Delivered at Gateway 3 and on Practical Completion (RIBA stage 6 or developed for existing stock)

A fire risk management strategy defines the building's current fire risk management system, the calculations on which risk management is assessed, the final, agreed, design intent (incorporating evacuation strategy), design information and the method of implementing the overarching policy.

Note: A fire risk management strategy can evolve from the fire safety strategy (and/or any changes made subsequent to refurbishment works)

Fire Safety Manual - Delivered at Gateway 3 and on Practical Completion, or developed for existing stock and maintained as appropriate. A fire safety manual contains all the design and operational records, instructions, manufacturer's literature and specifications etc. for all fire safety systems, and materials, within the building. Each component within each system is to be itemised and assigned an identification number, and maintenance, servicing and testing program. It also contains procedures in relation to building operation and management of evacuation.

Fire Log Book – All the records relating to the recommended training, testing, maintenance, alteration and inspection of all fire safety provision (as noted in the respective fire safety manual and Fire Strategy)

Fire Risk Assessment – 'Point in time' Record of the process (and reviews) of identifying fire hazards and evaluating the risk to people, property, assets and environment arising from them, taking into account the adequacy of current fire safety precautions and management systems. (This definition should accord with the definition given in PAS 79 and PAS 7.) The process of identifying fire hazards and evaluating the risks to people, property, assets and environment arising from them, taking into account the adequacy of existing fire precautions, and deciding whether or not the fire risk is acceptable without further fire precautions

Design Phase(s) Fire Risk Assessment(s) – The process for evaluating fire risk as part of the Fire Safety Strategy during the design, and the evolution of the design for the building. (Including during developments and future significant refurbishment/alterations)

Construction Phase Fire Risk Assessment – Works, The process for assessing and deciding whether or not the fire risk is acceptable (for safe occupation during construction and fit-out, including during refurbishment)

Pre–Occupation Fire Safety Assessment – The process for assessing and deciding whether, or not, the fire risk management system is acceptable for safe occupation/operation of the completed building.

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Occupied & Operational Fire Risk Assessment – The process for undertaking FRA on an appropriately frequent basis within occupied and operational premises. The exercise should include for review of the Fire Risk Management Strategy, current occupation and use, and current operational Fire Safety Management.

Alteration Fire Risk Assessment

There should perhaps be an additional category of Alteration Risk Assessment in regard to less significant works to ensure any opportunity to upgrade fire safety proportionally is considered. The following wording is taken from Paragraph 60 of BS9991.

"Alterations to a building should retain at least the level of fire safety protection that was in place before the alterations were carried out; it can, however, be beneficial to improve fire safety through building works, wherever practicable.

A fire risk assessment should be carried out regarding the impact of any proposed alterations to ensure that:

a) no unacceptable existing fire risks are continued;

b) existing fire safety measures are not compromised; and

c) no new fire risks are created."

Fire Risk Assessment Review – The process for assessing deciding whether or not the fire risk management system is acceptable for continued safe occupation/operation of the occupied and operational building. It is recommended that a Review of the Fire Risk Assessment is undertaken at least annually, and in the event of any significant change (ie: subsequent to a refurbishment) and as part of the Safety Case Review.

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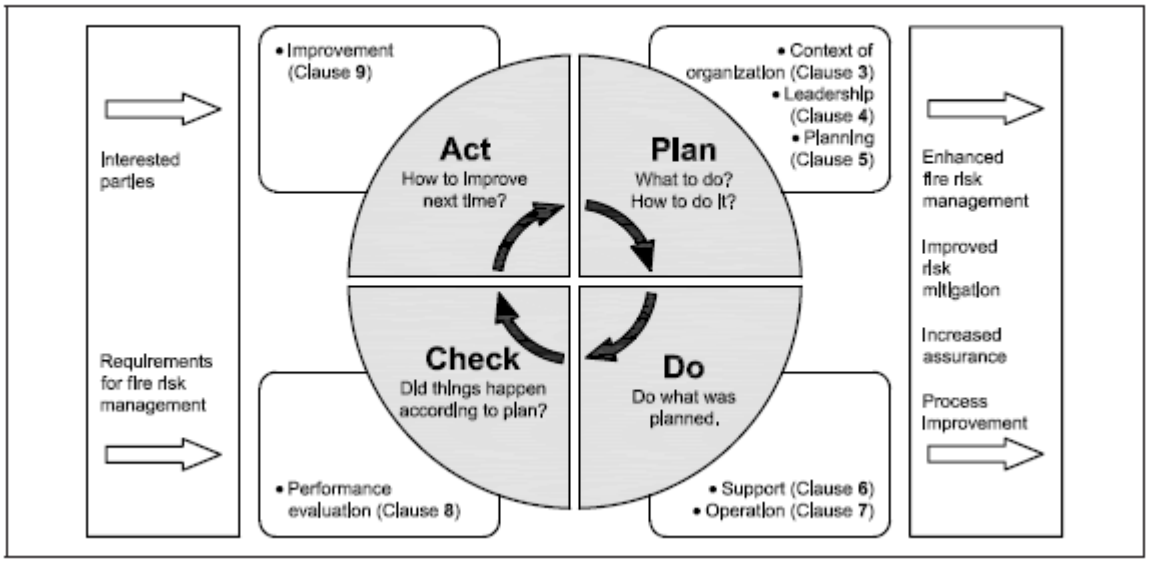
"Plan, do, check, act" model applied to Fire Risk Management Systems (FRMS)

The "plan, do, check, act" (PDCA) model to implementing, maintaining and improving an Fire Risk Management System (FRMS). The basis of the approach is shown in Figure 1, which sets out the requirements of the FRMS in the context of the PDCA model, and is also briefly described as follows:

- Plan: establish the objectives and processes necessary to deliver results in accordance with the organisations fire policy.
- Do: implement the processes.
- Check: monitor and measure processes against fire policy, strategic objectives, legal and other requirements, and report the results.
- Act: take actions to improve fire risk management performance continually.

Application of the PDCA model ensures consistency with other risk management models.

Figure 1 **Fire risk management "plan, do, check, act" model**



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Chapter 1 – Fire Risk Management Policy & Building Ownership/Management information

- A fire policy is defined as the intentions and direction of an organisation, in respect of fire safety as expressed by its top management.
- If the Organisation relates to the ownership and management of a single building the policy will relate to that single building only. If the Organisation owns or manages a portfolio of buildings the Policy will relate to how the organisation manages Fire Safety across the whole portfolio.
- **Signposting** – This documentation should observe the guidance on the content of these documents contained in PAS 7: 2013 – Fire Risk Management System Specification and the forthcoming BS 9997: 2019

1.1 Policy

The Organisation's top management shall establish a fire safety policy that:

a) is appropriate to the purpose of the organisation;

b) provides a framework for setting fire safety objectives;

c) includes a commitment to satisfy applicable requirements; and

d) includes a commitment to continual improvement of the FRMS.

The fire safety policy shall:

a) be available as documented information;

b) be communicated and understood throughout the organisation;

c) be available to interested parties, as appropriate.

- The organisation shall review the fire safety policy at planned intervals.
- A person authorised by top management shall sign and authorise the fire safety policy.

1.2 Ownership and Management

1.2.1 Current Owner (including address, and a nominated contact/responsible Person)

1.2.2 UK Contact (including address and a nominated contact/responsible person)

1.2.3 Current Managing Agent (including address and a nominated contact/responsible person)

1.2.4 Current Building Safety Manager (including address and a nominated contact/responsible person)

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Chapter 2 – Fire Risk Management Strategy for the Individual 'Whole Building'

- A fire risk management strategy document which defines the individual buildings' fire risk management system, the calculations on which risk is assessed, the design intent, design information and the method of implementing the overarching policy.
- The Duty Holder for the building shall arrange to document the Buildings' fire risk management strategy in order to define:

2.1 All aspects of the building's location:

2.1.1 Address and Postcode

2.1.2 Brief description of the building (eg: height/sq meters of various uses/car parking and proximate neighbourhood.

2.1.3 Location shown on a local area map

2.1.4 Access for Fire and Emergency personnel in emergency, site plans should illustrate fully the fire and rescue service access facilities.

2.1.5 Proximity to, and risk assessment of, any external fire risk (occupation/use of proximate properties).

2.1.6 Detailed, certified, 'As Built' Plans of the building. Critical transportation routes for building services should be identified on the site plans. This includes air/smoke duct routes, electrical cable runways and other fluid/gas pipelines utilised in the building. Associated with these service routes should be the any inherent risk assessment information, complete with any fire protection provided.

2.2 Occupation and use of the building for which the strategy is being developed.

2.2.1 Activities undertaken (assumed [or perhaps] allowed) by the occupants (including products and services manufactured, delivered from, or consumed within) the whole building.

2.2.2 Lease and other contact/contract/Duty Holding roles and arrangements with all occupiers

2.2.5 Emergency evacuation arrangements with marked- up plans.

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2.3 Assumptions made, and the associated calculations in regard to:

2.3.1 Occupancy (rates and occupation(s))

2.3.2 Smoke spread and control

2.3.3 Fire spread and control

2.3.4 Materials used in construction (including cladding)

2.3.5 Emergency Evacuation routes

2.3.6 Use of fire-fighting and fireman's Lifts etc

2.3.7 Access to fire-fighting water (ie: Hydrants, wet & dry risers etc)

2.3.8 A full description of the levels of passive fire protection provided throughout the building, including provisions for structural protection, compartmentation, protected shafts, fire-fighting shafts, cavities/voids and their respective protective barriers, fire doors, etc.;

2.4.8 Assumed Fire Fighting Plan

2.4.8.1 Purpose
This fire risk management system procedure defines the method by which [ORGANISATION] fulfils the function of emergency planning as required under the [RELEVANT LEGISLATION].

2.4.8.2 Scope

2.3.8.3. Responsibility
The [INSERT DUTYHOLDER] is responsible for ensuring the implementation of this procedure and providing the resources as necessary to meet the requirements.

2.4.8.4. References

2.4.8.5 Fire attack plan
(informative)

2.4.8.6 Liaison and communication with the fire and rescue Service

2.4.8.7. Emergency shut-down of equipment

2.4.8.8 Post-incident plan

2.4.8.9 Contingency plan

2.4.8.10 Emergency planning audits

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2.3.8.11 Management review

2.4.9 Any identified fire risks, and particular hazards for fire-fighters (e.g. some types of sandwich panels and other insulation and cladding materials);

2.4.10 Construction of refuges and evacuation lift enclosures

2.4.11 As appropriate, a description of the philosophy, method of calculation, design and analysis software used, assumptions, records of the inputs and outputs;

2.4 Passive and Active Fire Control Arrangements

2.4.1 Passive Fire Safety Arrangements

2.4.1.1 Descriptions of fire compartments on each floor/area, with marked-up plans

2.4.2 Active Fire Safety management Arrangements

2.4.2.1 Detection systems with marked-up plans

2.4.2.2 Protection systems with marked-up plans

2.4.2.3 Suppression/extinguishing systems with marked-up plans

2.5 Implementation Arrangements for Fire Risk Management at this building

2.5.1 Brief description of the management arrangements for the management of Fire Safety at this building

2.5.2 Brief description as to how management of any potential works (that may affect the integrity of Fire safety) are to be arranged.

2.5.2.1 – Management of Licences/Permissions to Alter

2.5.2.2 – Management of any permissions to Isolate Fire Safety Systems

2.5.3 Brief description as to how Fire Safety Systems are to be maintained and tested.

2.5.3.1 Purpose
This fire risk management system procedure defines the method by which [Building Duty Holder] fulfils the function of maintenance and testing as required under the [RELEVANT LEGISLATION].

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2.5.3.2 Scope

2.5.3.3 Responsibility
The [INSERT DUTYHOLDER] is responsible for ensuring the implementation of this procedure and providing the resources as necessary to meet the requirements.

2.5.3.4. Key legislative requirements
NOTE Include relevant legislative requirements here.

2.5.3.5. References

2.5.3.6 Maintenance and testing strategy
(informative)

2.5.3.7 Competency of contractors

2.5.3.8 Monitoring of systems

2.5.3.9 Maintenance and testing documentation

2.5.3.10 Maintenance and testing audits

2.5.3.11 Management review

2.5.3.12 safe system of work procedures for non-routine activities where these could increase the risk from fire, including hot work permits

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Chapter 3 - Fire Safety Manual

- A fire safety manual should contain Installation records, manufacturer's literature and specifications etc. for all 'Active' fire safety systems installed within the building.

- The Fire Safety Manual provides the crucial operational information necessary to maintain the execution of the Fire Strategy

- **Signposting** – This documentation should observe the guidance on the content of a Fire Safety Manual contained in Annex H of BS 9999: 2017 - Fire safety in the design management and use of buildings – Code of practice.

The Duty Holder for the Building will arrange to plan, document, implement and control the process of gathering the Fire Safety Manual. This will include for during the construction phase of a new development or during work undertaken during refurbishment and smaller works (when the works could impact the integrity of the Fire Safety Strategy.)

The Fire Safety Manual shall list and describe the function for each component part of the Active Fire Safety systems installed at the building.

The Fire Safety Manual will define the requirements of each component, including the:

- A record of the competent engineer (installation manager?) who has certified that the information submitted is adequate, appropriate and accurately defines what has been installed into the building and how it is to be maintained, serviced and tested.
- Each item, and sub-system component to the 'asset tagged' such that it can be identified, as necessary, on:
    - A CAFM system
    - PPM/Testing Program register
    - The Fire Safety Logbook
- Required maintenance
- Required servicing
- Required testing
- Required Statutory testing
- Lifecycle replacement information
- Guarantees and Certificates
- Recommended spare parts
- Acceptance tests and appropriate documentation

- Relating to each fire safety system; to ensure that they operate correctly in the event of fire, as part of the buildings Fire Safety Management System.

The Fire Safety Manual will include copies of each operations and maintenance manual necessary for the safe operation, maintenance and testing of components.

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a concise description with performance ratings of the active systems employed, specified and identified on appropriate drawings, including (for example only – the list below) to reflect the actual components, systems and sub-systems installed in the 'whole' building:

FEF Ref Number	Component	Sub System	System	Asset Tag	PPM	Service	Statutory test	O&M Manual
3.1	automatic fire detection controls;							(digital Upload)
3.2	smoke controls							
3.3	sprinklers							
3.4	emergency escape lighting;							
3.5	way-guidance;							
3.6	communications;							
3.7	clear identification of zoned areas of a building (e.g. fire detection zones, hazardous area zones) supported by plans/drawings;							
	etc							
	etc							

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Chapter 4 - Fire Risk Assessments and reviews

- The Fire Risk Assessment Process is in place to identify fire hazards and evaluate the risk to people, property, assets and environment arising from them, taking into account the adequacy of existing fire precautions, ~~and deciding whether or not the fire risk is acceptable without fire precautions.~~

- **Signposting –** This document will observe the guidance contained in PAS 79: 2012 - Fire Risk Assessment. Guidance and a recommended methodology.

The Duty Holders for the building shall establish, implement and maintain a formal documented risk assessment programme that systematically identifies fire hazards and persons especially at risk, analyses fire prevention and fire protection measures, evaluates fire risk and delivers a suitable and sufficient assessment of the risk of fire at the building

The current risk assessment will include a 'Fire Risk Rating' in accordance with XXXXXX

4.1 The building fire risk assessment programme including:

a) a defined scope, including its limitations;

b) a procedure for the assessment of competency of the fire risk assessors;

4.2 Construction Phase Fire Risk Assessment – Records of each Construction Phase Fire Risk Assessment

4.3 Pre –Occupation Fire Risk Assessment – Records of each Pre-Occupation Fire Risk Assessment (This form of fire risk assessment will form part of the Gateway 3 process and the Safety Case Review)

4.4 Annual Fire Risk Assessment Review – Records of each (no less than annual) Fire Risk Assessment (when the building/or specific demise) is occupied. This form of fire risk assessment will form part of the on-going safety case review process once the building is operational. The Annual Fire Risk Assessment will record:

- The demised area/common parts to which it refers
- The Duty Holder(s)
- The Responsible Person for the area to which it refers
- Any recommendations for improvement
- The Fire Risk Rating 'Fire Risk Rating' in accordance with XXXXXX
- The Date it was undertaken, and the recommended date for review (if less than 12 calendar months)

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Chapter 5 – Fire Safety Log Book

- It is essential for the safety of the occupants of a building that fire safety equipment (including passive fire protection provisions) are inspected frequently. Records (or the fire log book) should be established and maintained for the recommended testing, maintenance and inspection of all fire safety provision (as noted in the respective fire safety manual). The records of testing, maintenance and inspection of the fire safety measures will assist in providing evidence of suitable levels of fire safety management and as such should be adopted to more readily evidence legal compliance. All of the following aspects should be recorded.

- **Signposting –** The Fire Industry Association provide a useful template Log Book here: https://www.fia.uk.com/resourceLibrary/fia-log-book.html

5.1 Competent Persons undertaking Testing & Maintenance

Area Of Responsibility	Organisation Name & Address	Tel Number	Emergency Call out contact
Emergency Lighting			
Fire Alarms			
Sprinklers			
Risers			
Hand Held Extinguishers			
Fire Door Inspection			
Compartmentation and 'Fire Stopping'			
etc			

Guide to Recording Data (taken from Fire Industry Association 'Fire Safety Log Book'

You should record all events in the logbook, for example, you should record the date and time of:

- Genuine alarms (with location of trigger device and cause, if known)
- False alarms (with location of trigger device and cause, if known)
- Practices and drills
- Tests (e.g. alarms and emergency lighting)
- Defects and faults, and related remedial work
- Checks and inspections carried out by you or the service provider
- Maintenance (routine servicing or special), with brief note of work carried out and outstanding work
- Periods of fire safety provisions are removed disabled or disconnection

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In addition, you should record any alterations to systems and equipment, either temporary or permanent, (and, when permanent, update the relevant information of Plans or in the Fire Safety Manual). This would include temporary alterations to the fire detection and fire alarm system made to reduce the likelihood of false alarms, for example, due to contractors' works which generate dust, fumes or smoke.

Temporary alterations to fire detection and fire alarm systems may include:

1) Replacement of smoke detectors with heat detectors (if system suitable)
2) Provision of temporary screening between work areas and detectors
3) Provision of temporary covers, e.g. plastic bags, to prevent ingress of contaminating matter

The effectiveness of the system will be affected to some extent by any of these alterations and manual surveillance may be required. All matters relating to temporary alterations should be recorded, as should reinstatement of the system upon completion of the work.

5. 2 Planned Preventative Maintenance Schedule, including Statutory Inspections

Recommendations for frequency of activity (taken from Fire Industry Association 'Fire Safety Log Book'

- Intervals between inspections, tests or services should be determined by manufacture's recommendations and risk assessment, however the intervals should not exceed the frequencies listed

INTERVALS	ITEM	RECORD	BY WHOM
Daily	• Fire alarm indicator panel for normal condition • Indicator lights in emergency lighting units • Electro-magnetic door holders • Escape routes, exit doors, fire resisting doors. All chains removed.	Log Book if faulty None	User
Nightly	• Fire resisting doors held on electro-magnetic door holders closed, unused electrical equipment is switched off and unplugged, waste bins are emptied, etc.	None Log Book if faulty	User
Weekly	• Fire alarms *(actuation from different call point each week)* • Fire doors • Any automatic suppression systems fault check.	Log Book Log Book Log Book	User
Monthly	• Emergency lighting including auto start generator (simulated mains failure) • Fire alarm if automatic generator is used as part of the standby power supply • Fire blankets (Visual inspection) • Fire Extinguishers (Visual inspection)	Log Book Log Book Log Book Log Book	User
Quarterly	• Any automatic fire suppression systems • Possibly night staff fire training and drills	Log Book Log Book	Service Provider
6-monthly	• Fire detection and alarm system (by competent person) • Day staff fire training and drills • Electro-mechanical fire protection (Inc. door holders, Dampers, Fire Curtains and Smoke extract) • Rising Mains	Log Book Log Book	Service Provider
Annually	• Hose reels • Fire extinguishers • Escape lighting *(Full duration test – usually 3 hour)* • Fire blankets • Any automatic fire suppression systems	Log Book Log Book Log Book Log Book Log Book	Service Provider

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Item/Equipment/System	Ref: in Manual	Location	Maintenance/Service or Statutory Test	Frequency	Comment
Emergency Lighting 1			Statutory test		
Emergency Lighting 1			Service		
Emergency Lighting 1			Maintenance		
Emergency Lighting 2			Statutory test		
Emergency Lighting 2			Service		
Emergency Lighting 2			Maintenance		
Emergency Escape Drill	N/A	All Building	Maintenance	6 months	Depends on evacuation strategy (stay put/phased/ whole Building
Sprinkler 1					
Sprinkler 2					
Foam					
Smoke Vent					
Fire Door Inspection					
Compartmentation and 'Fire Stopping'					
etc					

DRAFT confidential

Chapter 6 – Building Occupier Engagement Strategy

6.1 Tenant/Occupier Information on Occupation

The Information below can be provided to occupiers via electronic 'training' such as presentation slides, video presentation etc. at a level to provide, to occupiers, appropriate awareness of Fire Safety Management throughout the building. Such presentations are to enhance awareness of residents' responsibilities to each other and to fire safety of all occupants.

If the above method is used a full copy is to be retained and made available at all times, and is to be updated in the event of change.

6.1 Copy of electronic means of delivering the information required 6.1.2 – 6.3.5 below (if method used)

6.2 Information that is to be provided to the Occupier :

6.2.1 Name/contact information of BSM, Duty Holders (Owner, Landlord, Managing agent, letting agent etc

6.2.2 System for logging complaints/defects in Fire Safety

6.2.3 Process/contacts to escalate a complaint

6.2.4 Rights and responsibilities of the occupier

6.2.5 Date and copy of last FRA

6.2.6 Pictorial/symbol

6.2.7 Overview of fire fighting/detection equipment (e.g. fire alarm, smoke detection, emergency lighting, AOVs, extinguishers, dry risers, sprinklers, etc.) that are installed in the building and overview as to their function in the building.

6.2.8 Location of emergency escape and exit routes

6.2.9 Fire Action Policy (Evacuate or Stay Put)

6.2.10 Contact details for local Fire Authority

6.2.11 Means/procedures for dealing with vulnerable residents (disabled, elderly, etc.)

6.2.12 Means/procedures for dealing with residents where English is not their first language

DRAFT Confidential

6.3 Incident response communication

The Duty Holders for the Building shall establish, document and maintain policies and procedures for communication, which include:

6.3.1 means of being alerted to a fire;

6.3.2 communications between management, and between management and staff;

6.3.3 communications to occupants;

6.3.4 communications with the fire and rescue service; and

6.3.5 other businesses with whom fire safety risk is shared to some/any extent.

6.4 Emergency planning

The Duty Holders for the Building shall establish, document and maintain procedures for identifying and responding to any unplanned event, potential emergency or disaster.

- These procedures should seek to prevent or mitigate the consequences of any such occurrence and consider the continuity of the business operations. The planning should include logistical issues such as shelter provision, communications, transport, the weather, the time of day, time of week, time of year (holidays, etc.), and traffic-related issues, as well as scenarios such as power failures.

DRAFT Confidential

Hackitt Review – Working Group 8

A Framework for the Building Safety Manager

Hand-Out for CIC Steering Group Meeting 3rd October 2018

Dutyholders, their relationships and their Duty of Care

Exercise to define the role and competencies required of a 'Building Safety Manager' as set out in the Hackitt Final Report

WG8 – Contributing Organisations:

GVA	BB7
BIFM	National Social Housing Fire Group
FPA	IFSM
Managing Agents Property Health and Safety Forum	ARMA
RICS	IRPM
CIAT	NFCC
LGA	British Property Federation
NHF	BRE Group
CIH	TPAS

+ Legal Advice from Mike Appleby (Fisher Scoggins Waters LLP Solicitors)

Dutyholders, their relationships and their Duty of Care

Exercise to define the role and competencies required of a 'Building Safety Manager' as set out in the Hackitt Report

Background & Summary of recommendations

The Hackitt report recommends that the ultimate Duty Holder for an HRRB is the 'Owner', and that the owner must provide a UK contact.

The Hackitt report is also very clear as to the need for 'post Grenfell' change in the industry culture and improvements in the competencies applied to the task of delivering and maintaining safe residential accommodation.

Dame Hackitt, in her foreword, makes it clear that the key roles for prioritising building safety should be the same as those identified in CDM 2015. She says:

> ***A radical overhaul to futureproof the system***
>
> *While this review recommends a different approach, it is far from being a leap of faith. It is built upon confidence of what we know works here in our culture in other sectors, and more importantly in the construction sector.*
>
> *The Construction (Design and Management) Regulations (CDM Regulations) under the Health and Safety at Work Act have already driven exactly this culture and behaviour change in the very same industry sector in relation to the safety of those employed in constructing and maintaining buildings. Other industry sectors have developed a mature and proportionate way to manage and regulate higher-risk and complex installations. These approaches now need to be repeated in relation to the safety and quality of complex buildings and to the safety of those who live in them. This is not just my view but one that we have heard repeatedly from the many people we have spoken to as part of this review – they have told us that they want to see a revised framework for building regulation, one that is as clear and effective as the CDM Regulations.*

After consideration WG8 shares her view that CDM provides a good blueprint to drive the required 'culture' change necessary in the 'post Grenfell' environment.

HRRB and beyond – the opportunity

Although the Hackitt report is concerned directly with HRRBs, the reality is that the new regime, in time, will evolve and need to apply to 'all multi-occupied residential property'. WG8 have considered this matter and regard it important to consider the role in broader terms, therefore, and as has previously been addressed by WG8, the work will not focus on HRRBs alone, rather our Terms of Reference have been extended to consider 'all multi- occupied residential property', (the range of properties that this may include is considered elsewhere in the report.)

Recommendation 1: Each individual property with any residential accommodation should be provided with a licence defining the 'class' of property. The Class would be defined from a (possibly extensive) list of property types and their occupation, and thereby their 'complexity' in fire engineering terms, and 'risk factor', including the risk derived from occupation. The 'Property Class' would be determined from the list by the JCA at Gateway 3 or during Safety Case Reviews, and by their nature would pre-determine the competence required of those responsible for it. Primary legislation should determine this classification promptly, and this classification could be used as a method for determining the phasing in of the new Legislation.

While the Hackitt report focuses on HRRB's, it recognised that many recommendations should in due course become applicable to other types of residential buildings. Primary legislation could provide for this by having a phased implementation whereby HRRB's have a short transition period, with longer transition periods for other classes (non-HRRB's) of residential buildings. Such phased approach to implementation would provide businesses with certainty and proportionate time to begin to adopt improved safety and fire management across the spectrum.

While it may be feasible to add a 'licence to operate' a building, to which conditions of operation could be attached, careful consideration should be given to the bureaucracy that would be needed to be put in place to inspect and establish the 'conditions', monitor them and agree they are being met. Enforcement of any new system will be key to its success.

An alternative (or complementary) measure, with almost identical result, could be that the establishment of the Fire and Emergency File (FEF) as set out in WG8's other recommendations (eg: a detailed and prescribed collection of information residing in a central national database) as, effectively the Licence to Operate the property, could, in itself, be regarded as the conditions for operation. Each FEF is, by its nature, very specific to the individual building. Any deviation from the management arrangements set out in the FEF could be made a criminal offence. This would also have the benefit of further 'encouragement' for those 'in control' to be well aware of the FEF, and to keep it current. Similarly the Fire and Emergency Services/Local Authority or other enforcement agency (JCA?), could research the information remotely should they require to do so.

Demonstration of BSM competency – a licence

Further debate has led to the conclusion that all those that work as an 'in the field' BSM, (as envisioned in the Hackitt report), or work in this role within a Residential Accommodation Operator

[RAO] accredited organisation, or as an independent specialist consultant delivering the service, will need to be able to demonstrate that they have the required credentials to support their work.

WG8 therefore propose that there should be a licencing system to demonstrate their individual competency, aligned to competencies necessary for particular types of buildings/types of uses. Having considered the nature of the role it is also suggested that a more appropriate name is 'Building Safety Co-ordinator' as the role is accepted as too extensive to be an expert in everything, rather a co-ordinator with the competence to understand what needs to be done, by whom and to understand what information they are provided with, (by the experts), and what to do with it.

Recommendation 2: An individual role should be created the 'Building Safety Co-Ordinator' (BSC) and that these individuals will need to hold a 'permissioning licence', similar to a driving licence, which sets out 'classes' of building types/occupancy within which the individual is deemed competent to undertake their overall safety co-ordination role. Referred to as the 'Building Safety Co-ordinator' within this document. This function, along with the other key roles below, their licensing systems and what they entail, should be written into primary legislation.

Scope of the BSC + formats for BSC function delivery – a person and/or organisation

WG8 have considered Hackitt's view that the BSM role should require oversight of 'safety' as a whole and not be restricted to fire safety only. A great deal of discussion and debate has been undertaken within WG8 about the extent of the role of the Building Safety Manager, and what may be deemed '**fair, just, proportionate and reasonable**' in relation to the potential role a BSC may be asked to deliver, (in partnership and with the support of the JCA), and therefore be held responsible for. WG8's deliberations have reconfirmed that, in reality, the 'Safety' element of the role should not, (and in practical terms probably cannot), be diluted, as the intent is to create a role with total oversight of safety, including fire safety within residential buildings; the concept of a 'Regulated Partnership' would be an appropriate route forward.

Hackitt also requires that the Duty Holder will be responsible to appoint a 'Natural Person' as the Building Safety Manager. So while it is possible that, in certain circumstances, an individual will be appropriate, it is WG8's view is that role should not be restricted to a specific, single, individual:

Following the approach of Reg 8 of CDM 2015 WG8 suggest the 'BSM' *"must have the skills, knowledge and experience, and if they are an organisation, the organisational capability, necessary to fulfil the role…..in a manner that secures the health and safety'* of the occupants, visitors and workers in a building.

Looking at the Hackitt report and the responsibilities outlined for a Duty Holder, with the assistance of the BSC, WG8 anticipates that realistically the role/function will have a very wide scope and that, in practice, for many buildings, given their complexity, and to meet the required competencies this will often only be achieved through an organisation.

It is WG8's view that the role of a BSC is arguably more challenging than the role of managing/co-ordinating the pre-construction phase of a construction project. Under CDM 2007 this pre-construction phase role was performed by the CDM Co-ordinator, usually an individual. It is now performed, under CDM 2015 by the Principal Designer (PD). HSE's preference is that a PD, except

for small projects, should be an organisation rather than an individual. HSE has indicated that they consider that the role under CDM 2007 was not working.

Recommendation 3: WG8 therefore propose that an Organisation should be licenced to operate residential accommodation, [appropriate to the building type(s)/Occupant(s)] and in line with the Hackitt report. To ensure transparency for residents and to provide an identifiable contact person, a senior manager within the organisation should be named as the 'BSC for and on behalf of' the [Licenced] organisation. Referred to as the 'Residential Accommodation Operator's Licence' (RAO) in this document, and potentially similar to existing licences for public houses).

In regard to the term 'senior manager' WG8 would see this aligned in a similar vein as existing H&S and other statutory duties imposed on organisations. That the 'natural person' (individual signing for and on behalf of the organisation) would be the Managing Director/Chief Operating Officer or other senior manager, at partner level and above, who could be held accountable due to their responsibilities within the organisation. This would include the assurance of adequate resources, including competences, being made available to deliver their organisations 'undertakings' in a safe and proper manner. For the sake of clarity, while the RAO and its senior manager would take on the many liabilities accompanying the BSC function, to ensure the competency, they would employ relevant (to the required building class) BSCs. Without those relevant, natural people, BSCs in place, they would not be able to deliver the BSC function as a RAO. Both these routes (RAO and individual BSC) for delivery of the BSC function should be included in primary legislation.

Duty Holder - Licence to operate

WG8 also recognise the desire to be able to identify an owner or Landlord as the 'Duty Holder' (with UK contact details). Our work has identified this could range from an individual with a small number of HMOs, a block owned and managed by its occupants, a significant private investor, or, increasingly a 'fund' set up specifically to invest in this 'new' asset class. This latter situation (a Fund), needs further consideration/consultation by HMG as WG8 are unaware of a funds' legal entity status and as such the identification of an obvious 'controlling mind'. Enabling sufficient housing stock is a key priority of HMG, and one of the means of ensuring this is attracting more funds, including pension funds. It has come to our attention that such funds may be reluctant to attract, in their view, 'additional' responsibilities.

However WG8 consider that it is indeed necessary to identify a controlling mind, (not least as the link to the Building Safety Co-ordinator) and, as such, propose these too should be licenced 'to operate', so that they are made aware of their responsibilities and their accountability.

Recommendation 4: The Owner/Landlord of residential property to be required to make an application for 'Duty Holder' licence to the JCA, the JCA would then grant the licence having deliberated that the applicant is 'fit and proper' to hold the licence. This requirement would ensure that, at an appropriate time, the petitioner would need to fully comprehend their obligations as duty holder. The 'Duty Holder' (DH) licence should be held by the legal entity, with an appointed person named 'for and on behalf of' the legal entity, alternatively, where the 'entity' is an individual the individual person can hold the licence in their own name. Referred to as a 'Duty Holder Licence' within this document. Along with the other key stakeholders in this document, this duty holder role should be included in primary legislation.

'Whole' building – what is it?

The matter of the definition of a 'Whole' building is not addressed here as further guidance has been requested from the Steering Group/IRG. WG8 suggest a complex such as St Pancras station provides an illustration as to the difficulty in defining the expression.

More guidance is needed on what constitutes a 'whole' building so as to ensure the eventual competency framework meets the brief that is anticipated.

Residency engagement

The relationship between an occupier and the DH or building manager is not always straightforward and in practice there are very few tools in place to make residents cooperate with building managers so as to enable them to carry out their job. Residents or occupiers should be made aware of their obligations and responsibilities, as well as rights, and how they can play a significant role in keeping the premises safe to live in. Occupiers very often don't understand the role they play, nor do they understand fire principles and what can be done in certain situations. Obviously, the Hackitt review has identified resident engagement as lacking in many instances. There are best practice examples in the housing sector which have conducted information campaigns to their residents; outlining how residents could help building managers help them and outlining basic principles of fire etc. Another factor compounding the establishment of a good working relationship between the occupier and the building manager, is that the resident is not always the person on the lease. For this reason, we refer to the 'occupier' in this context.

Recommendation 5: WG8 believe there should be a form of 'Residents Charter', but this to have obligations on the three key parties (individuals living at an address [rather than their name being on any lease], the 'Duty Holder' and the 'manager of the property', the BSC). WG8 will further deliberate what the occupier's obligations should (realistically) be and will revert with greater detail.

We will consider the need for two layers of obligations:

- The first layer should touch on the general obligation for residents/occupiers not to put their fellow residents at risk. We will explore defining what the WG considers they should be responsible/have obligations for.
- The second layer is likely to touch on those powers that are needed to ensure the safety of all residents, including the power of entry/access, what tools does the DH/BSC have to ensure residents/occupiers enact what is needed. How can the DH be expected to execute their legal duty if he hasn't got any tools to execute them? One route is to ensure that residents are protected by empowering them to take the right decisions. How can residents be supported to contribute to building safety. Primary legislation should include the different routes that could be part of the BSC's toolbox. "Reasonable and proportionate power of access", is one of the important concepts that should be included in primary legislation.

Recommendation 6: The knowledge of occupiers to be upgraded by the issue, and regular reissue, of Public Service Broadcast 'basic fire and safety in residential buildings' films/videos /brochures etc. These should include foreign languages/braille etc. This material to be made freely available

to the 'property industry' for further distribution through tenant 'handbooks and the FEF etc. The intention of the Public Service Broadcasting would be to effect long term and lasting change in occupiers' attitude to their obligations to neighbours (and themselves) and therefore their behaviours in respect of fire and general safety. It is envisaged that the information would need to be universally understood (including young adults and those who will not have English as a native language) and would follow along the lines of past initiatives such as HIV, smoking, Change4Life and 5Alive. The broadcasting would need to be repeated/refreshed continually and could be required to be made available through occupier information packs/FEF (by way of links to YouTube etc?). Given the importance of raising awareness on this life safety topic, the public awareness raising campaign should be included in legislation.

By empowering occupiers by way of knowledge we envision society would be better protected.

The golden thread of information

Underpinning good building safety will be the basis to make informed decisions on when managing buildings overall. This is even more important when managing the safety of buildings. Dame Hackitt recognised what many in the occupation phase already knew, that a building's documentation is often poor, incomplete and dispersed.

Recommendation 7: WG8's first recommendation to the IRG was around the documentation that would be essential to carry out the function of a competent BSC. While we will be making specific recommendations for a safety case file in general, an initial recommendation centred on the Fire and Emergency File:

- **WG8 Recommend that the definitions set out in our FEF recommendation in relation to:**
    - **Fire Policy**
    - **Fire Safety Strategy**
    - **Fire Risk Management Strategy**
    - **Fire Safety Manual**
    - **Fire Log Book**
    - **Fire Risk Assessment(s)**

  Should be set down in Primary Legislation.

This will remove current misunderstanding/misinterpretations by both business and enforcement as there are numerous explanations for each phrase in current use. Business would also welcome this as both parties (those that deliver the documents and those that acquire the documents) know exactly what each are referring to.

- **WG8 have further recommended that the FEF be defined and structured in detail, and that this structure and the finally agreed taxonomy should be set down in primary legislation. Indeed, the entire safety case file taxonomy should be set out in legislation. This would avoid the 'variations' currently delivered as H&S Files (under CDM) and enable easy and immediate identification of information in regard to any building.**

- **Which MUST remain separate to (but be cross-referred from) the Health and Safety File and other such information that the Duty Holder/BSM requires/may require to undertake their roles**
- **The overall information necessary for a BSM to operate effectively will be extensive, and as such, a formal structure should be imposed by legislation. This structure should be significantly more prescriptive than the H&S File.**
- **Key definitions of documents should be prescribed by primary legislation (see above)**
- **Government should deliver a national database similar to the EPC to hold all FEF**

Funding of the Hackitt regime

As the Hackitt report indicated, the assumption is that the regulators will be funded on the basis of a full cost recovery basis. It is therefore noteworthy that the licensing system will generate fees, as such supporting the cost recovery element.

Competency framework for the BSC

WG8 is arriving at the point where actual competencies for the BSC can be discussed, having explored in detail their potential operating environment.

As part of the competencies, WG8 will also research and articulate what the limits to the BSC competencies are. As part of this exercise, it will be important to understand the BSC's relationship with the JCA. For example, at what point will it be acceptable that the BSC escalates matters to the JCA, or at what point should they invoke a whistle blowing scheme? Will the JCA have a separate whistle blowing scheme for BSCs or will there be one scheme for all interested parties?

In addition to the above, it is worthwhile pointing out that liabilities for the BSC will be shared with the duty holder and with the RAO. The to be defined competency framework should enable us to provide greater clarity in where the boundaries to the different roles/functions lie.

Summary of deliberations and evaluations

Owner/Duty Holder: Appointment thereof:

WG8 have yet to address the detailed obligations related to this position, its roles and responsibilities, but this paper assumes them as the 'owner' of a property and it's their Duty to appoint a Building Safety Co-ordinator. However we do recommend they are required to hold a 'Duty Holder' Licence. The objective of this would be to ensure that the Duty Holder is aware of their duties and responsibilities.

Building Safety Manager/Co-ordinator: Appointment thereof:

After much debate regarding the practicalities of the appointment of the BSM, WG8 considered that the role has a much wider scope and in practice for many buildings, given their complexity, to meet the required competency, this will only be achieved through an organisation. This is consistent with and builds on the approach in Regulation 8 of CDM 2015. Any legislative change or guidance should not prohibit this approach. Furthermore, when an organisation would fulfil the function, a senior manager within the organisation should be named as the BSC. Allowing this approach (organisation + identifiable BSC) prohibits senior members of an organisation from hiding behind more junior individuals and thus may render an organisation free of liability that it should in fact be accountable (not withstanding other mechanisms would exist for holding organisations to account through existing legislation in some cases).

The range of skill sets that may be needed by an individual (BSM) are incredibly broad and while there are, currently, no doubt a limited number of individuals who could fulfil such a role, the breadth and depth of expertise within an organisation would better serve a duty holder and occupants to deliver the appropriate level of whole building safety.

Adopting this approach does not in any way detract from the original (Hackitt) proposal as responsibility remains clearly defined to be with a single organisation. While this takes care of the competency needed for the day to day management, the clearly identifiable person, with relevant competencies, would be fulfilling the need to have an identifiable person for the residents that helps the Duty Holder discharge their responsibilities for the building. That organisation will in turn be 'accountable in contract' to the Duty Holder and also to the JCA to whom they must demonstrate through the safety case that whole building safety is managed.

Where an organisation (ie: rural or SME sized lettings agent) is too small to have all the required competencies to deliver the role of the BSC they will need to sub-contract to competent persons or another organisation. It may be assumed this role may evolve in a manner similar to the initiation and development of the role of a (early CDM) Planning Supervisor or CDM Co-ordinators, and lead to a new discipline of individual professional consultants.

It may therefore be anticipated that a new, independent, discipline will evolve, (or effectively be created,) by the introduction of the BSM. In turn this should demand the introduction of pre-determined competencies necessary to deliver the role effectively, and perhaps some form of 'permissive licence to operate' for each individual holding themselves out as competent.

Where the property is owned by the occupants the owners, or the Management Board, will need either to train one member to a sufficient competence to take the role of BSM, or sub contract independent consultants, albeit either route will cost money.

- The principle of organisational responsibility is already enshrined within health and safety legislation, the closest parallel being CDM 2015 where it has been recognised that the skill sets needed to perform the function of Principal Designer, (or previously the 'Planning Supervisor' and 'CDM Co-Ordinator') are often best served by appointment of an organisation. It is recommended that a model similar to that of CDM is adopted with the BSM being re-titled a 'Building Safety Co-Ordinator'.

Depending on the specific circumstances and the number of separate demises within the 'whole building' it may be assumed this cost would be shared through the service charges.

As has been noted above the competence necessary for an individual to take on the role is exceptional if the building concerned is in anyway a 'complex' or 'higher risk' building.

If the logic above is taken forward it would appear practicable to determine and develop 'basic' BSM role training for anyone who holds themselves out as competent, whether employed by an organisation, or as an individual independently providing the service, this [basic training], to be supplemented by further training 'modules' appropriate for the full range of buildings the BSM seeks to oversee.

In turn, again, the range of necessary 'further modules' needs to be determined by a combination of occupation 'type' (eg: private housing, institutional, supported, social, care home or accommodation above a retail parade in a high street) and the 'Complexity' of the actual structure, (in fire engineering terms). These combined could deliver a 'Building Risk Rating'.

Additional thoughts:

- Having considered the nature of the role it is also suggested that a more appropriate name is 'Building Safety Co-ordinator' (BSC) as the role is accepted as too extensive to be an expert in everything, rather a co-ordinator with the competence to understand what needs to be done, by whom and to understand what information they are provided with, (by the experts), what to do with it, what the right questions and challenges are.

- The principle of Licensing Individuals to differing levels of competence (core + special modules) is well established, a vehicle driving licence being possibly the most obvious model for 'permissive' licensing system appropriate for the Building Safety Co-ordinator.

- The principle of licencing individuals (owners) to be responsible/duty holders for specific types of building (operation) is also well established through the licensing systems used for alcohol, gambling or perhaps even the licensing of HMOs? (Houses of Multiple Occupancy operated by local authorities)

- Further consideration needs to be given to the definition of 'Whole Building' and, within this context, to the BSC role in the event of a partially occupied building

- Further consideration needs to be given to the role of the BSC in relation to any requirement to 'sign-off' on works, and the relationship to 3rd party suppliers of both services and products

Determining Property Risk

WG8 have looked at the wide range of properties that may include for accommodation, (see D1).

The group consider that it would be useful to establish a method of determining a building risk rating, in the context of safety.

However: A Building Risk Rating will, inevitably, also have an effect on:

- Insurers/Insurance premiums
- Value (including willingness of supported occupiers to live in 'higher risk' buildings?)
- Rental value/ability to rent at all

Therefore, perhaps the term 'Building Risk Rating' is unhelpful, and rather a term such as a calibration of 'Classes of Residential Property Licence' would be more accurate, based on occupancy type and 'complexity'.

We considered that the property (which may be a sub-division of a 'whole building') could be classified in relation to its 'type' and its 'complexity' (as related to fire engineering terms and occupational challenges). One such existing list that could be considered being the Business Rating system(?), or perhaps the model 'Use Class' Order [The Town and Country Planning (**Use Classes**) **Order** 1987 (as amended) puts **uses** of land and buildings into various categories known as '**Use Classes**'.

We would recommend that a specific working group be set the task to determine the list of property 'classes'.

The Residential Property would be assigned a 'Class' at Gateway 3, or if already constructed, at the Safety Case Review, by the JCA. The Class, once the list is determined, could be assigned to existing buildings by the Fire & Emergency Services, or Local Authorities.

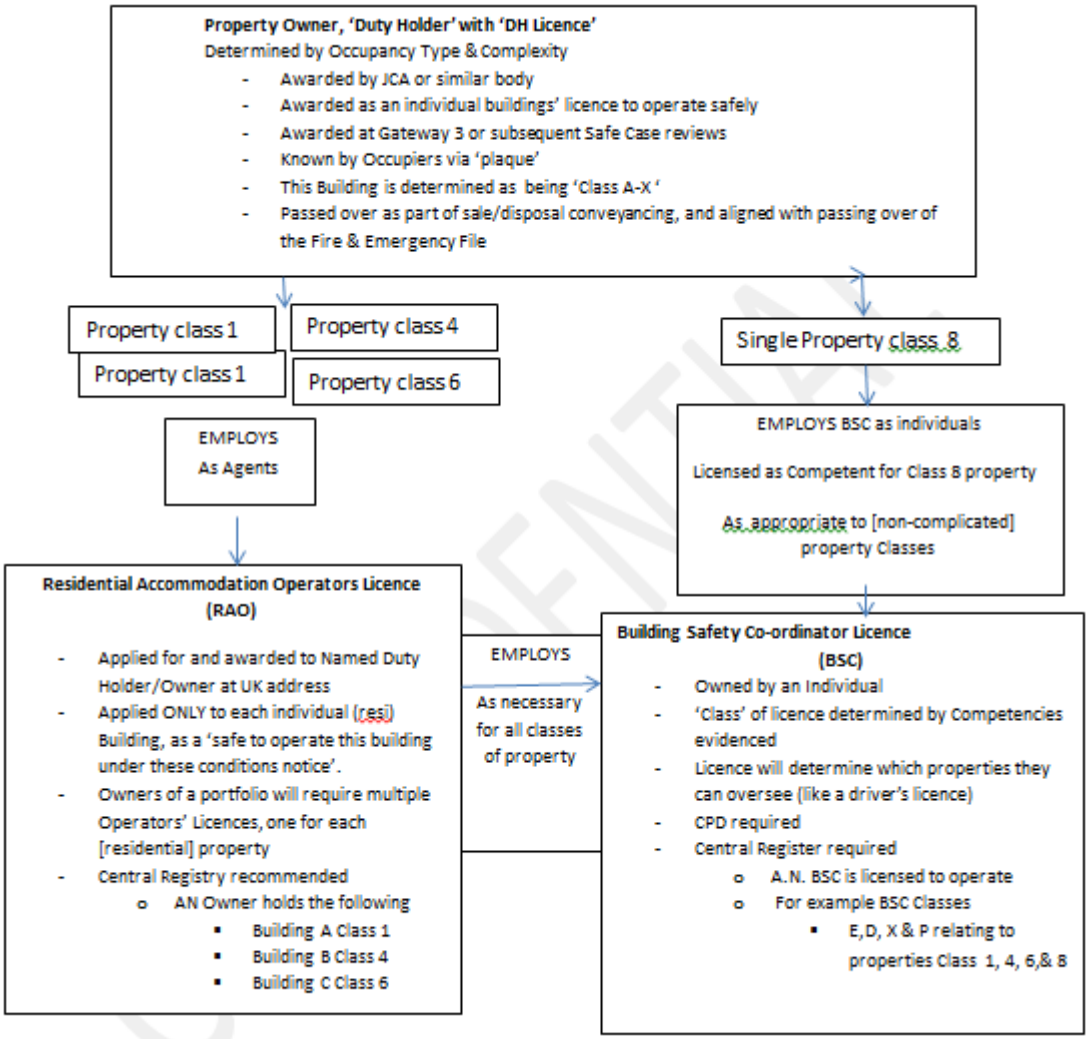
The Class would be advised to tenants and could be designated on a plaque on the outside of each relevant building.

The 'Class' of building would, by the nature of the assignation, pre-determine the level of competence necessary to be in place to operate the building safely, and therefore can be used to determine the resources necessary to award a BSC/Residential Accommodation Operator licence, and the corresponding BSC's competency classes.

While recognised as a matter also being considered by other Working Groups, an individual building's risk rating (or 'Class') could, in the context of a BSC, be a method to determine:

- The BSC competencies necessary to operate the building
- The further training modules necessary to be developed in addition to the 'Basic BSC' training.

This matter should be subject to further consultation with the insurance industry, and perhaps with 'Fund' managers who manage funds created to own and operate residential accommodation assets to investigate whether awarding a 'class' would affect insurance, or the potential to raise money to provide the much-needed housing. What is the right to do and how can the insurance industry help to resolve this?



- Where an organisation is contracted to take the role of BSC, as likely as not in regard to portfolios of buildings with differing occupations types/complexities, the organisation will be required to have (one or more) appropriate individuals, holding Building Safety Co-ordinator Licences for specific individuals/BSC, with all the necessary 'classes' of competence to accommodate the variety of building licenses held by their clients. It will be incumbent upon any organisation owning/managing residential property that their policy, procedures are in place to support their services and this would be challenged during a safety case review.

Occupiers: Their Role, expectations and obligations

WG8 have established and discussed at some length the current obligations on occupiers:

- Much depends on the length and type of lease
- Recognised that most occupiers will not read or understand the Lease (inc: foreign language)
- Access is generally available to the owner/agent in contract terms, but is exceedingly difficult to arrange/execute in practise. (indeed, can be made quite difficult on purpose by occupiers at both ends of the social spectrum).
- Most will have no comprehension as to fire (or other safety) principles and their place in the matter.
- Recent experience in Courts have underlined the extensive time and costs that can be incurred in seeking to make individual occupiers address fire safety matters (ie: replace front doors etc). There is also a significant volume of the 'problem doors' out there.

There is a new 'breed' of occupier such as web-based accommodation providers – this has been encouraged at low level by UK Tax authorities allowing certain levels of income.

It is WG8's view that the concept of an 'Informed Occupier' is virtually non-existent, and unlikely to change with regard to more technical matters.

Occupiers of all types are primarily concerned with cost, whether direct on-cost or via service charges.

The relationship of the occupier with any 'management' may be through:

- Owner directly
- Managing/lettings agent
- Hotelier
- Tenant association
- Building Management Board (owner/managers)
- The building caretaker/facilities manager
- Simply 'on-line'
- Local Authority/Social Housing 'liaison officers etc

And therefore getting consistent dialogue is not easy or regular.

WG8 believe there should be a form of 'Residents Charter', but this to have obligations on the three key parties (individuals living at an address [rather than their name being on any lease], the Duty Holder and the 'manager of the property' or BSC.

The knowledge of occupiers to be upgraded by the issue, and regular reissue, of Public Service Broadcast 'basic fire and safety in residential buildings' films/videos /brochures etc. These to include foreign languages/braille etc. This material to be made available to the 'property industry' for further distribution.

The 'Charter' to supported by Law and enforceable by Fire & Emergency Services or Local Authorities And have significant (but proportionate) sanctions to include:

- (enforceable) fines, perhaps levied by way of increased rent due to higher cost of managing the risks/hazards the occupant has introduced.
- Eviction
- Potential to revert un permitted works at the occupants expense, even if undertaken by Agent due to indifference being shown to remediate by occupiers (may need to be based on being the responsibility of the current occupier whether or not the work done by previous occupants, opposite of 'polluter pays principle').

Occupier Obligations (reiterated where the obligation is already in Law or lease)	**'Licenced Residential Property Owner' with Duty Holder Licence (DH), or their representatives.**
To have 'viewed' Occupier training	Provide access to Public Service Broadcast training materials
Not to block fire exits/fire corridors etc. One suggestion being The issue of prams etc. in hall. Change the law to "leave it – lose it". Simple, singular and visible. It stops arguments and it sends a message that the law is on the BSM's side for a reason.	Tenant assoc liaision,
Not to undertake unpermitted works	Twice annually issue a tenant information briefing
Not to interfere with Fire compartmentation/doors , including propping of fire doors	Provision of Whistleblowing capacity
Provide access on demand (high penalties should be sanctioned via legislation, however consideration will need to include the reality that a Court Order is required to get a Leaseholder to forfeit a lease)	Information as to Class of Building Licence and all Licence holders. (details will be on national register?)

Specific Issues seeking to be addressed

	Issue	Potential Solution for consideration	
Owner	Duty Holder will be unaware of their duties, (and potential sanctions), in particular if they are ex-UK	Existing Stock: Put a duty on conveyancing Lawyers to advise on completion of property transactions. New Build: Put a Duty on the Principal Contractor (CDM) to advise Client. + Licenced DH	
	Much UK property held by offshore funds, managed by 'non-owners' simply managers of the Fund not the buildings – How will the Duty Holder in UK be identified?	Licencing of Residential Property Owning entities with a named individual ' for and on behalf of'	
	Not dissimilar in the situation where the 'Owner' of the property has gone bankrupt and is not 'in control' the bank, or the Banks' appointed Insolvency Practitioner may be in control but not 'duty holder'?		
	Duty Holder will not know where to find/how to employ a BSC	National Register of licence BSC holders	
	Duty Holder (RPO) may have a portfolio of properties, and may employ an Agent (RAO) to manage them	Portfolio: 1/ Duty holder (DH) is advised of all the Buildings, '**Property Class'**. by Conveyancing Lawyer/Principal Contractor subsequent to Gateway 3 2/ Duty Holder holds a **Duty Holder (DH) Licence**, 3/ Duty Holder appoints '**Residential Accommodation Operator' (RAO)** as agent 4/RAO **,** employs suitable and sufficient numbers of **Licenced Building Safety Co-ordinator(s) (BSC)** with all the credentials to operate all of the properties from all of the RAO's clients.	Single Property 1/ Duty holder (DH) is advised of the buildings', '**Property Class'**. by Conveyancing Lawyer/Principal Contractor subsequent to Gateway 3 2/ Duty Holder holds a **Duty Holder (DH) Licence**, 3.1/ Duty Holder appoints '**Residential Accommodation Operator' (RAO)** as agent or 3.2/ DH **,** employs directly a suitably competent individual **Licenced Building Safety Co-ordinator(s) (BSC)** with the credentials to operate the designated property's class

	In the event of 'Self-owned/Managed' blocks the management team will not wish to take on the responsibility	Make it a Joint and Several obligation unless an individual is named. Will need: **a)** **DH Licence** for Duty Holder **b)** **Property Class assigned** The Management Board is advised of the buildings', '**Property Class'**. by Conveyancing Lawyer/Principal Contractor subsequent to Gateway 3 **c)** **Residential Accommodation Operators Licence** to operate it (as a Board) **d)** **Building Safety Co-ordinator** to advise and oversee (either one of the Board or an independent)	Single Property 1/ Duty holder (DH) The Management Board is advised of the buildings', '**Property Class'**. by Conveyancing Lawyer/Principal Contractor subsequent to Gateway 3 2/ Duty Holder (owner) holds a **DH Licence**, 3.1/ Duty Holder appoints '**Residential Accommodation Operator' (RAO)** as agent or 3.2/DH**,** employs directly a suitably competent individual **Building Safety Co-ordinator(s) (BSC)** with the credentials to operate the designated blocks/Propertys' property class
	Duty Holder will not wish to pay added fees/Service charged tenants will not wish to be charged more	HMG make recommendations statutory obligations	
	Providing the name (publicly) of the Duty Holding owner will not assist Occupiers and just result in calls to senior personnel with little direct daily responsibility for accommodation.		

~~**Building Safety Manager (BSM)**~~ **Licenced Building Safety Co-ordinator**	Role too extensive for an individual to be adequately competent for the role	The Role becomes a 'Function' of an organisation, either the 'Owners' organisation or that of an Agent when delegated by contract. The Owner(s) would require **DH Licence(s)** Agent would require: **Residential Accommodation Operators Licence** And an appropriate number of **Licenced Building Safety Co-ordinators** With the appropriate mix of 'classes' of competence to be responsible for all the buildings classification(s) Organisations will be likely to need a wider range of competencies to address the wider range of client portfolio buildings	Where the Organisation or an individual has one property only , it would require one of each **Property Class** certificate **Duty Holder Licence (DH)** **Residential Accommodation Operators Licence** **Building Safety Co-ordinator Licence** (the BSC would only need to relate to the Property class issued by the JCT and held by the owner [DH]
	Role has too greater legal responsibility relating to the wide range of safety/Health/Fire/occupier liaison etc	Remove the word 'manager' from the title. WG8 Recommendation being: <u>Licensed Building Safety Co-ordinator</u>	Licencing also enables management of competencies. Licencing may also relate to Building Risk Rating? (or as recommended 'Classes of Residential Property Operation Licence'
	BSM may be responsible for one property, or perhaps a number within a single portfolio of similar types of properties, or a number of properties each of differing type.	Competencies should relate to a 'Basic common level of competence for a BSM' with additional, specialist, competencies relating to the property type (for example: - HRRB - Parade of retail shops with accommodation - Accommodation in a mixed use development - Institution - Owner/Managed block - Social/Supported accommodation - Hospital - Hotel - etc	Licencing attached to Classes of individual LBSC competence, similar to driving licence.
	Will the LBSC be responsible to 'sign-off' works?	If so is this both pre- and post practical completion, and would have to be supported by expert consultants if beyond their individual licence?	Related to the appointment timing of the LBSC
	Direct contact number for occupants: Within large portfolios this tends to be delivered by service desks. For small portfolios/single buildings this will tend to 'naturally' be the LBSC	The Name on the **Residential Accommodation Operators Licence** would serve as the contact number – organisations can agree this internally (not unlike SIA/waste handling licences?)	If there are national Registers for both RAOL and LBSC the numbers will be easily available to those that really seek them, and this will (indirectly) encourage licencees to maintain public records up to date.

Suggested sign-off wording from WG9

1. Given that the 'Principal Supervisor' will be appointed and will undertake 'sign-off' that the build has been carried out and meets the specifications correctly, the group proposed draft wording for a 'Principal Supervisor's Statement'. This was created in collaboration with a firm of Professional Indemnity insurance professionals:

CONSTRUCTION OF OUR DESIGN

Our Design means the part of the design for which we have overall responsibility and which is defined in the documents scheduled in appendix A. *[Note- this would be the as-built information including remit, appointment, specifications, drawings and schedules, incorporating all changes – ie exactly as-built]*

Sub-Designers' Statements are statements similar to this that have been provided to us by third parties who are responsible for the design of parts of **Our Design**. We rely upon all **Sub-Designers' Statements** in making this "Construction of Our Design" statement. All relevant **Sub-Designers' Statements** are included in appendix B.

We confirm that we have exercised reasonable skill and care to see that the relevant part of the construction works generally comply with the principles of **Our Design**.

Signature of Designer's representative

IRG STEERING GROUP ON
COMPETENCE FOR BUILDING A SAFER FUTURE

Competence for Building a Safer Future Steering Group

Memorandum of Understanding

We, the organisations indicated below, agree to collaborate and jointly work as partners together with members of the Industry Response Group[1] to collectively advance, subject to the terms of understanding detailed below, the development and delivery of actions that seek to implement the recommendations and proposals made in the:

Independent Review of Building Regulations and Fire Safety: Final Report[2]
which relate to **Competence** and are described within **Chapter 5 and Appendix E**.

Organisations:

Construction Industry Council
Fire Sector Federation
Royal Institution of Chartered Surveyors
[others to be added]

[1] Industry Response Group established July 2017 by Ministry of Housing Community and Local Government, Build UK, construction Industry Council and Construction Products Association
[2] Cm9607 May 2018

Competence for Building a Safer Future Steering Group (CSG)

Terms of Understanding

Purpose

CSG seeks to progress an agreed scope of work[3], which is outlined in Recommendation 5.2 of the Final Report, through joint effort and actions that aim to achieve the implementation of an overarching body able to provide oversight of competence arrangements and support delivery of competent individuals to help build a safer future.

Organisation

The organisation foundation is based upon a collective steering group led by a Chairman appointed by the Industry Response Group. The steering group will be comprised from those leading working groups.

The working groups intend to be representative of Engineers, Installers, Fire Engineers, Fire Risk Assessors, Fire Safety Enforcement Officers, Building Control- Standards Inspectors, Building Designers-Architects, Building Safety Managers, Site Supervisors, and Project Managers. Each working group will agree with CSG the appointment of a leader and secretary. Working group membership will be drawn from the wider construction and fire sectors to assist in broadening knowledge and increasing inclusiveness.

Decisions

CSG decisions will be made collectively unless expressly delegated and CSG members may appoint alternative representatives.

No decision made by CSG will interfere, restrict, in any way control or place any liabilities other than those directly mentioned in this memorandum on any participating organisation.

Communication

Internal communications within member organisations are the responsibility of the individual member. Transparency and inclusiveness are to be promoted responsibly within the member organisations to encourage quality and ultimately adoption.

External communications are the responsibility after consultation within the CSG of the Chairman.

Membership Principles

Open and transparent discussions, work, effort and action based upon goodwill and acknowledged conflicts of interest to support clarity, problem solving and achievement of the CSG purpose from member organisations.

Attribution

The Chairman with agreement of the CSG will be assigned the role of spokesman for the CSG

Confidentiality

[3] The Scope of Work described and subject to review and amendment during CSG meetings

Discussions at CSG meetings are considered confidential to all members and any invited non-members actually present. Information gathered for the purpose of the CSG may not be used commercially or for gain without consent.

Finance

The Construction Industry Council will facilitate meetings at its Store Street London office. All other costs for attendance, travel and meetings at other locations will be the responsibility of members.

Intellectual Property

Ownership of intellectual property resides with the members unless they agree otherwise

Duration

The CSG anticipates its actions being concluded before June 2019

Secretariat

The CSG will be supported by the Construction Industry Council Secretariat. Responsibility for dissemination and coordination activities outside CSG authorised actions rests with members.

Meetings

Regular meetings will held as directed and agreed with the Chairman with administration of venues minutes and discussion papers facilitated and coordinated by the Secretariat.

Amendment

CSG may amend this memorandum at any time to reflect change in its operating environment

Organisation	Acronym	WG1	WG2	WG3	WG4	WG5	WG6	WG7	WG8	WG9	WG10	WG11	WG12
	CPO					WG5							
	BPA								WG8				
	FSF				WG4								
	TPAS								WG8				
Architectural Registration Board	ARB							WG7					
Arup				WG3									
ASFP					WG4								
Association for Project Management	APM										WG10		
Association for Project Safety	APS											WG11	
Association for Specialist Fire Protection	ASFP							WG7					WG12
Association of Consultant Approved Inspectors	ACAI						WG6						
Association of Consultant Architects	ACA							WG7				WG11	
Association of Residential Managing Agents	ARMA								WG8				
Atkins Global				WG3									
BAFSA					WG4								
BB7	BB7			WG3					WG8				
BEAMA	BEAMA												WG12
BRE Group	BRE	WG1		WG3	WG4				WG8		WG10		WG12
British Approvals for Fire Equipment	BAFE				WG4							WG11	
British Institute of Facilities Management	BIFM								WG8			WG11	
British Property Federation	BPF								WG8				
British Woodworking Federation	BWF												WG12
Building Alliance					WG4								
British Standards Institute	BSI												WG12

Building Services Research & Information Association (BSRIA)	BSRIA	WG1											
BuildUK	BuildUK		WG2								WG10		
Chartered Association of Building Engineers (CABE)	CABE	WG1		WG3			WG6	WG7				WG11	
Chartered Institute of Architectural Technologists	CIAT			WG3			WG6	WG7	WG8		WG10		
Chartered Institute of Builders	CIOB						WG6			WG9			
Chartered Institute of Housing	CIH								WG8				
Chartered Institute of Procurement & Supply (CIPS)	CIPS											WG11	
Chartered Institution of Civil Engineering Council	CICES										WG10		
Chartered Institution of Plumbing & Heating Engineers (CIPHE)	CIPHE	WG1											
Construction Industry Council Approved Inspectors	CICAIR						WG6						
Construction Products Association													WG12
County Durham & Darlington Fire & Rescue Service						WG5							
CROSS				WG3									
Devon & Somerset Fire & Rescue Service	DSFRS					WG5							
Engineering Council	EC	WG1											
Fire Industry Association	FIA		WG2	WG3	WG4								
Fire Protection Association	FPA				WG4				WG8				
FIS	FIS												WG12
FOA	FOA					WG5							
Gardiner & Theobald	G&T											WG11	
Greater Manchester Fire & Rescue Service	GMFRS					WG5							
Guild of Architectural	GAI												WG12

Ironmongers												
Guinness Partnership											WG11	
GVA	GVA							WG8				
IFPO	IFPO			WG4								
Institute of Clerks of Works	ICWCI									WG10		
Institute of Fire Engineers	IFE		WG3			WG6						
Institute of Fire Safety Managers	IFSM			WG4				WG8				
Institute of Healthcare Engineering and Estates Management (IHEEM)	IHEEM	WG1										
Institute of Materials & Mining (IOM3)	IOM3	WG1										
Institute of Residential Property Management	IRPM							WG8				
Institution of Civil Engineers (ICE)	ICE	WG1								WG10		
Institution of Engineering & Technology (IET)	IET	WG1										
Institution of Gas Engineers & Managers (IGEM)	IGEM	WG1										
Institution of Mechanical Engineers (IMechE)	IMechE	WG1										
Institution of Structural Engineers (IStructE)	IStructE	WG1	WG3				WG6	WG7			WG11	
Kent Fire & Rescue Service					WG5							
Kingspan Insulation Ltd												WGF12
Knauf Insulation												WG12
Lancashire Fire & Rescue Service	LFRS				WG5							
Liquid Roofing & Waterproofing Association	LRWA											WG12
Local Authority Building Control	LABC			WG4	WG5		WG6	WG7				
Local Government Authority	LGA								WG8		WG11	

London Fire Brigade	LFB				WG5						
London South Bank University	LSBU								WG10		
Managing Agents Property H&S Forum								WG8			
Martin Fire				WG4							
Mid and West Wales Fire and Rescue Service					WG5						
Minister for Housing Communities and Local Government	MHCLG							WG8			WG12
NARM	NARM										WG12
National Fire Chiefs Council	NFCC	WG3	WG4	WG5	WG6	WG7	WG8				WG12
National House Building Council	NHBC				WG6						
National Housing Federation	NHF						WG8			WG11	
National Social Housing Fire Group	NSHFG						WG8				
NFRC	NFRC										WG12
North Yorkshire Fire & Rescue Service					WG5						
Northumberland Fire & Rescue Service					WG5						
NT	NT			WG4							
Oxfordshire Fire & Rescue Service					WG5						
PCSG	PCSG										WG12
Polypipe											WG12
Rockwood											WG12
Royal Berkshire Fire and Rescue Service					WG5						

Royal Institute of British Architects	RIBA						WG7		WG10		
Royal Institution of Chartered Surveyors	RICS				WG6	WG7	WG8		WG10		
SCA	SCA										WG12
Scottish Fire and Rescue Service				WG5							
SFPE	SFPE		WG3								
Shropshire Fire & Rescue Service				WG5							
Skanska										WG11	
Society of Façade Engineers (SFE)	SFE	WG1									
Sodeca											WG12
South Wales Fire and Rescue Service				WG5							
South Yorks Fire and Rescue Service				WG5							
SPRA	SPRA										WG12
Surrey County Council	SCC			WG5							
The Welding Institution (TWI)	TWI	WG1									
Trowers & Hamlins LLP										WG11	
UK Accreditation Service	UKAS							WG8			WG12
University of Edinburgh			WG3								
West Midlands Fire Service				WG5							
WWC Ltd	WWC								WG10		