

Raising the Bar Interim report

Improving Competence, Building a Safer Future

This response is submitted by Build UK, which is the leading representative organisation for the UK construction industry, bringing together Clients, Contractors, Trade Associations, Specialist Contractors, and Professional Services.

Build UK has played a leading role, alongside the Construction Industry Council (CIC) and Construction Products Association (CPA), on the Industry Response Group, which has provided a coherent, consistent and collective response from industry to the events at Grenfell Tower. Build UK is also a member of the Competence Steering Group and played a major role in the development of its anticipated Interim Report.

The framework in place prior to the Grenfell fire should have been sufficient to deliver buildings that are safe for people to live in. The flaws identified by Dame Judith Hackitt, which led to that fire, infiltrated the system due to a lack of governance and accountability, gradual changes in working practices which became 'acceptable', along with a culture of lowest cost and blurring of responsibilities.

This applies equally to the expected levels of competence for all those involved in the delivery of HRRB's. The extent of detail in Raising the Bar has shown that the current training, skills and competence system is not fit for purpose and supports the findings by Dame Judith Hackitt.

We support the Competence Steering Group's (CSG) objectives of:

- A coherent and consistent approach to assessing and ensuring competence
- A culture change across the whole building industry so that everyone recognises their responsibility as part of a wider system for delivery safe buildings.

However, before any new system or regime is introduced, we need to be absolutely confident that there is a clear and direct line between each and every requirement and improved competence.

Executive Summary

Below is a list of Build UK's recommendations targeted at ensuring each Working Group (WG) meets the two objectives of the CSG and conforms with the general recommendations made in the report.

- A. The outcome or recommendation of each WG, and any subsequent proposals, should demonstrate that they directly respond to or address one or more of the issues identified by Working Group 0 (WG0).**
- B. There should be an industry competence framework with core principles that encompass the different levels of competence which all roles, occupations and professions can follow.**

- C. Consistent terminology must be agreed and used across the industry.
- D. Any proposals should determine if there are additional or different competence requirements for each role, occupation or profession in relation to HRRB's.
- E. A matrix of relevant industry bodies should be prepared along with their credentials e.g. Are they currently regulated, independent, have criteria etc.
- F. Any proposals should determine if competence relates to individuals and/or companies.
- G. The different roles, occupations and professions relevant to HRRB's should be clearly defined.
- H. For construction related occupations, the existing industry card scheme system should be reviewed to ensure it includes all the occupations and professions relevant to HRRB's.
- I. The insurance industry and the MHCLG Residents' Reference Group should be consulted on any proposals.

1. We fully support the findings of WGO which identifies four key issues:

- I. *The current landscape for competence is fragmented, complex and inconsistent*
- II. *Existing systems for assessing competence are not necessarily suitable for HRRBs*
- III. *It is difficult for residents, dutyholders and regulators to ensure that those employed and deployed at the relevant stages of a building's life cycle are sufficiently competent*
- IV. *In the current system, responsibility is too widespread and there is often not one person carrying the primary responsibility for building safety at each stage¹.*

A. The outcome or recommendation of each WG, and any subsequent proposals, should demonstrate that they directly respond to or address one or more of the issues identified by WGO.

2. The WGs have in general operated independently and the Competence Steering Group must now bring the recommendations together.

3. Any new competence systems or regimes introduced must integrate into a streamlined industry-wide system which must be easily understood by those within and outside the industry. Each WG must align to the industry wide system which will enable companies and individuals to 'build' their capabilities and competence in a logical manner, and to transfer their skills and knowledge across disciplines.

B. There should be an industry competence framework with core principles that encompass the different levels of competence which all roles, occupations and professions can follow.

C. Consistent terminology, including a shared definition of competence, should be agreed and used across the industry.

4. There are differences between the WGs on the degrees of competence for those working on HRRB's.

5. Each Working Group should identify if those working on HRRB's are required to have additional knowledge and competence. We recognise that the answer may depend upon the role, occupation or profession.

¹ From the CSG report.

D. Any proposals should determine if there are additional or different competence requirements for each role, occupation or profession in relation to HRRB's.

6. There are a significant number of recommendations relating to membership of professional bodies.
7. There is a lack of consistency across WGs on whether competence is related to an individual and/or a company.
8. There should be a clear process to determine which, if any, industry bodies qualify as 'recognised professional/certification body' for the purposes of competence, and how this is determined.

E. A matrix of relevant industry bodies should be prepared along with their credentials e.g. Are they currently regulated, independent, have criteria etc.

F. Any proposals should determine if competence relates to individuals and/or companies.

9. For all dutyholders to easily identify who is competent, the agreed level of individual competence should be clearly set out against each role, occupation and profession.
10. It should also be simple for an individual to demonstrate that they have achieved the required level of skills, knowledge and qualification.

G. The different roles, occupations and professions relevant to HRRB's should be clearly defined.

H. For construction related occupations, the existing industry card scheme system should be reviewed to ensure it includes all the occupations and professions relevant to HRRB's

11. Any new system or regime introduced must satisfy those that regulate or insure any part of the industry, and reassure building owners and occupiers, that it is fit for purpose and will deliver buildings that are safe for people to live in.

I. The insurance industry and the MHCLG Residents' Reference Group should be consulted on any proposals.

12. We find ourselves repeating our concluding paragraph in our response to Building a Safer Future.
13. Certainty, clarity, and consistency are essential on all the outcomes from this consultation. Specifically, any new regime must leave no room for ambiguity and will require additional engagement and consultation with industry if it is to be confident of any new regime being fit for purpose.
14. Finally, MHCLG must be in a position to commit to the Government and its relevant departments, as both a regulator and a client of construction, to implementing the outcome of this consultation once agreed.

Yours faithfully



Sarah Garry
Project Director