



**NFCC**  
National Fire  
Chiefs Council

The professional voice of the  
UK Fire & Rescue Service

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15<sup>th</sup> November 2019

Dear Graham,

Please find attached the National Fire Chiefs Council (NFCC) response to the consultation paper *'Raising the bar (interim report): Improving competence, building a safer future'*.

The NFCC is the professional voice of the UK fire and rescue services, and is comprised of a council of UK Chief Fire Officers. This submission was put together through the NFCC's Protection and Business Safety Committee, which I Chair. The Committee is comprised of protection and fire safety specialists from across the UK.

NFCC acknowledge the scale and breadth of work that has been undertaken by all those involved in the Competency Steering Group work over the past 15 months. Bringing together representatives from key stakeholders involved in the design, construction, regulation, operation and maintenance of buildings in scope to drive improved competency standards has delivered some key outcomes, including proposals for a Building Safety Competence Committee and competence frameworks. It also includes identification of the need for additional roles to support building safety in the new regime.

NFCC believe however, that the Government and the fire and construction sector still have a long way to go to ensure that a positive legacy from the Grenfell Tower tragedy is achieved. Raising the competency standards of those working on all buildings in the built environment is a core component of assuring this, as it will underpin many of the proposed changes to the regulatory framework.

For the purposes of this consultation, NFCC have provided responses to those aspects directly related to competency. NFCC believe that the additional work undertaken by Working Group 1 on safety cases and Working Group 8 on the new regulatory regime should be fed into Government to inform debate on the new regulatory system. We trust that the following comments are helpful and welcome further discussion and the opportunity to consult on this important issue.

Yours sincerely,

**Mark Hardingham**  
**NFCC Protection and Business Safety Committee Chair**



**Response to: *Raising the Bar* (Interim Report) Consultation  
Improving Competence, Building a Safer Future**

**Electronic Questionnaire responses**

**1. Name**

Mark Hardingham

**2. Position (if applicable)**

Chair of the Protection and Business Safety Committee

**3. Name of organisation (if applicable)**

National Fire Chiefs Council

**4. Address (including postcode)**

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**6. Telephone number**

n/a

**7. Please confirm whether you are replying as an individual or submitting an official response on behalf of an organisation.**

Organisation

**8. Please indicate whether you are applying to this consultation as:**

Fire and Rescue Authority Representative

**Other (please specify)**

National Fire Chiefs Council (NFCC) is the professional voice of the UK fire and rescue services (FRS), and is comprised of a council of UK Chief Fire Officers. This response was put together through the NFCC's Building Safety Programme Team which is comprised of fire and rescue service fire safety specialists from across the UK.

## 9. Please indicate if you wish your comments to be attributable or anonymous.

- Yes, please attribute my comments

## 10. Please offer any general comments.

NFCC acknowledge the scale and breadth of work that has been undertaken by all those involved in the Competency Steering Group work over the past 15 months. Bringing together representatives from all key stakeholders involved in the design, construction, regulation, operation and maintenance of buildings in scope to drive improved competency standards has delivered some key outcomes. These include proposals for a Building Safety Competence Committee and competence frameworks. It also includes identification of the need for additional roles to support building safety in the new regime.

NFCC believe however, that the Government and the fire and construction sector still have a long way to go to ensure that a positive legacy from the Grenfell Tower tragedy is achieved. Raising the competency standards of those working on **all** buildings in the built environment is a core component of assuring this as it will underpin many of the proposed changes to the regulatory framework. Consideration may also need to be given to creating competent organisations.

For the purposes of this consultation, NFCC have provided responses to those aspects directly related to competency. NFCC believe that the additional work undertaken by WG1 and WG8 on the new regulatory system should be fed into Government to inform debate on the new regulatory system. We trust that the following comments are helpful and welcome further discussion.

### **Structured Document Questions:**

#### 11. With regards to the Executive Summary, do you think the analysis is correct?

- Yes

NFCC fully support all generic recommendations by the Competency Steering Group.

#### 12 With regards to the Executive Summary, has anything been left out?

- Yes

NFCC are concerned that a two tier competency system is being created due to the focus being on those individuals working on buildings in scope. Issues with competency in disciplines involved in the procurement, design, construction, assessment, management and maintenance of the built environment are not solely related to buildings in scope therefore the expansion of competency frameworks for all disciplines and all buildings should be developed (where necessary) as a priority.

Additionally, NFCC are of the opinion that the scope of the new regime may be more appropriately set at 11m and above for residential buildings and include specialised housing, care homes, hospitals and prisons. The scope of buildings should be

regularly reviewed by the Building Safety Regulator, with the ability for this to expand over time.

**13. With regards to the Executive Summary, do you agree with all the recommendations?**

No

For the purposes of this consultation, NFCC have provided responses to those aspects directly related to competency. NFCC believe that the additional work undertaken by WG1 on safety cases and WG8 on the new regulatory system should be fed into Government to inform debate on the new regulatory system.

**14. With regards to the Executive Summary recommendations, how are they likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

Similarly, it is appropriate that those who regulate the built environment are suitably competent to provide consistent, robust enforcement and are independently assessed through a nationally recognised professional body. The revised Competency Framework for Fire Safety Enforcing Officers addresses key issues identified in *Building a Safer Future*. NFCC will continue to drive improvement in competence standards in the sector.

**15. With regards to the Executive Summary, what would you like to see next?**

NFCC would like to see an interim Building Safety Competence Committee created to drive improvements in competency standards as outlined in *Raising the Bar* and culture change across the fire and construction sector.

**16. With regards to WG0 Overarching System for Overseeing Competence, do you think the analysis is correct?**

Yes

**17. With regards to the WG0 Overarching System for Overseeing Competence, has anything been left out?**

Yes

The proposals outlined by WG0 are welcomed by NFCC, however, we consider that unless there is the ability for the Building Safety Competence Committee to issue effective sanctions (either directly or through the Building Safety Regulator) on organisations and/or individuals, the effectiveness of this Committee to hold sectors to account may be undermined.

NFCC also notes that the WG0 bottom up approach does not fully address the assurance of competency of those individuals (largely within the installer and proposed building safety manager sector) who do not have a trade organisation or professional body to provide assurance and re-assurance of competence.

NFCC recommend that additional focus is given to this particular aspect by WG0, WG2, and WG8.

NFCC considers that the Building Safety Competence Committee function could also include:

- Driving the development of publicly recognised governing or regulatory bodies where none exist for certain disciplines.
- Driving cultural and behavioural change in the industry.
- Undertaking market surveillance, flagging risks and promoting learning across the sector.
- Driving the development of learning materials on basic fire safety principles.
- Assisting in developing common definitions of roles and technical terms that could be used in law.
- Engaging with the Education sector to promote the quality of training provision and ensure the pipeline of necessary skills is monitored and skills shortages addressed.
- Consumer education and awareness on the requirements to use suitably competent persons.
- Driving collaboration between professional or trades bodies to ensure that essential learning for buildings in scope is widely available.

**18. With regards to the WG0 Overarching System for Overseeing Competence, do you agree with all the recommendations?**

No

See response to Q17

**19. With regards to the WG0 Overarching System for Overseeing Competence, how are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**20. With regards to the WG0 Overarching System for Overseeing Competence, what would you like to see next?**

NFCC consider that cultural change within the industry has been slow and that more needs to be done to encourage improved competency for all buildings. One of the key components to raising the standard of competency in a timely fashion is to ensure that there is a mandatory requirement to employ only suitably competent persons on buildings in scope. This can be expanded over time to include all buildings.

NFCC would also like to see the creation of an interim Building Safety Competence Committee to assist in driving forward the proposals in *Raising the Bar* prior to the implementation of the proposed legislation.

Priority work includes developing the benchmark competence framework for all disciplines involved in buildings in scope. Similarly the development of competency frameworks for key roles including dutyholder, principal designer and principal contractor could be progressed. The development of competency frameworks for disciplines involved in all of the built environment also need to be developed for some sectors.

**21. With regards to WG1 Engineers, do you think the analysis is correct?**

Yes

**22. With regards to WG1 Engineers, has anything been left out?**

No

**23. With regards to WG1 Engineers, do you agree with all the recommendations?**

Yes

NFCC commends WG1 for the work that has been undertaken on the bow tie risk analysis and safety case and recommends that this work is promoted to Government to ensure that learning is disseminated and carried forward (where appropriate) into the new regulatory regime.

**24. With regards to WG1 Engineers, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**25. With regards to WG1 Engineers, what would like to see next?**

Continuing progress on the work to date.

**26. With regards to WG2 Installers, do you think the analysis is correct?**

- Yes

**27. With regards to WG2 Installers, has anything been left out?**

- Yes

NFCC notes that WG2 has had, and will continue to have, a challenging task in determining an appropriate competency framework for installers. WG2 has suggested that developing and embedding their competency frameworks will take 8-10 years to achieve. Clarity is required on how support will be provided to working groups during this time.

**28. With regards to WG2 Installers, do you agree with all the recommendations?**

- No

Part of the work of WG2 is to ensure that there is robust oversight of individuals to ensure competency. It is noted that there are a large number of individuals and industries within this sector and it will only be through working with (and being supported by) the Building Safety Competence Committee that this will be achieved. Currently the fragmented landscape does not lend itself to the effective raising of competency standards. The creation of professional / trades bodies would assist with this, as would appropriate oversight through third party certification.

**29. With regards to WG2 Installers, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**30. With regards to WG2 Installers, what would you like to see next?**

Continued work on the development of (an) appropriate competence framework(s).

**31. With regards to WG3 Fire Engineers, do you think the analysis is correct?**

- Yes

**32. With regards to WG3 Fire Engineers, has anything been left out?**

- No

**33. With regards to WG3 Fire Engineers, do you agree with all the recommendations?**

Yes

**34. With regards to WG3 Fire Engineers, are the recommendations likely to affect you and in what way?**

Nationally there are 50 qualified fire engineers employed by FRS. Where these individuals are working on buildings in scope they, and their employers, will need to ensure that they are complying with enhanced competency standards. This may impact FRS through increased costs associated with assuring relevant competency for these individuals.

**35. With regards to WG3 Fire Engineers, what would you like to see next?**

Continued development of the competency standard for fire engineers working on buildings in scope with appropriate stakeholder engagement and communication.

**36. With regards to WG4 Fire Risk Assessors, do you think the analysis is correct?**

Yes

No

**37. With regards to WG4 Fire Risk Assessors, has anything been left out?**

Yes

NFCC believe that it is fundamental that all fire risk assessor schemes are accredited by an independent third party such as UKAS to ensure robust oversight of fire risk assessor competency. NFCC notes that the Institution of Fire Engineers (IFE) is licensed by the Engineering Council however, the fire risk assessors register currently has no third party oversight. NFCC recommends that this is resolved as this may result in some routes to certification/ registration being less robust than others.

NFCC are also concerned that there is no benchmarking of competency standards across the 6 differing routes to third party certification or registration.

**38. With regards to WG4 Fire Risk Assessors, do you agree with all the recommendations?**

Yes

**39. With regards to WG4 Fire Risk Assessors, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built

environment will support the work undertaken by Fire Safety Officers by ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

Under the Regulatory Reform (Fire Safety) Order 2005 the responsible person must appoint a competent person to carry out the preventative and protective measures required by the Order. However, the Order does not specify that the person undertaking the fire risk assessment has to be competent. A robust competency framework with appropriate independent competency validation through benchmarked nationally recognised bodies for all buildings (not just those in scope) would make a significant contribution to fire safety in the built environment.

**40. With regards to WG4 Fire Risk Assessors, what would you like to see next?**

Continued development of the competency framework and benchmarking of the existing third party certification schemes to ensure equivalence.

**41. With regards to WG5 Fire Safety Enforcement Officers, do you think the analysis is correct?**

Yes

**42. With regards to WG5 Fire Safety Enforcement Officers, has anything been left out?**

No

**43. With regards to WG5 Fire Safety Enforcement Officers, do you agree with all the recommendations?**

Yes

**44. With regards to WG5 Fire Safety Enforcement Officers, are the recommendations likely to affect you and in what way?**

It is appropriate that FRS ensure that those who regulate the built environment are suitably competent to provide consistent, robust enforcement and are independently assessed and re-assessed through a nationally recognised professional body. The revised Competency Framework for Fire Safety Enforcing Officers addresses this and other key issues identified in *Building a Safer Future*. All FRS will be impacted by the revised Competency Framework through increased costs. NFCC will continue to drive improvement in competence standards in the sector.

**45. With regards to WG5 Fire Safety Enforcement Officers, what would you like to see next?**

NFCC notes that the Institution of Fire Engineers (IFE) is licensed by the Engineering Council however, the auditors register currently has no third party oversight by this organisation. NFCC will work with the IFE to resolve this matter. In addition, the

publication of the Competency Framework for Business Fire Safety Regulators as a Fire Standards Board Standard needs to be progressed.

**46. With regards to WG6 Building Standards Professionals, do you think the analysis is correct?**

Yes

**47. With regards to WG6 Building Standards Professionals, has anything been left out?**

Yes

NFCC recommends an extension of the Building Standards Professional's competency framework to include those competencies required to regulate the built environment. This will ensure that the whole spectrum of the role is encompassed in a competency standard. In addition, NFCC are concerned that the competency assessment processes for Approved Inspectors and Local Authority Building Control (LABC) are different and recommend that consideration is given to a consistent approach to validation of competency.

**48. With regards to WG6 Building Standards Professionals, do you agree with all the recommendations?**

Yes

**49. With regards to WG6 Building Standards Professionals, are the recommendations likely to affect you and in what way?**

FRSs regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and are a statutory consultee for Building Standards Professionals when a building is undergoing refurbishment or prior to construction as most buildings will be subject to the Regulatory Reform (Fire Safety) Order once built. Having a robust competency framework in place for all Building Standards Professionals for all building types, (which is independently assured through a nationally recognised professional body) should provide assurance of competence to FRS. Where disagreements arise between FRS and Building Standards Professionals, the new regulatory regime should allow for dispute resolution via the Building Safety Regulator.

**50. With regards to WG6 Building Standards Professionals, what would you like to see next?**

NFCC supports the extension of the Building Standards Professional's competency framework to include those competencies required to regulate the built environment. This will ensure that the whole spectrum of the role is encompassed. The competency assessment processes for Approved Inspectors and Local Authority Building Control (LABC) should be aligned to promote consistency.

**51. With regards to WG7 Building Designers, do you think the analysis is correct?**

Yes

**52. With regards to WG7 Building Designers, has anything been left out?**

No

**53. With regards to WG7 Building Designers, do you agree with all the recommendations?**

Yes

**54. With regards to WG7 Building Designers, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**55. With regards to WG7 Building Designers, what would you like to see next?**

Continued progress on the work to date.

**56. With regards to WG8 Building Safety Managers, do you think the analysis is correct?**

Yes

No

**57. With regards to WG8 Building Safety Managers, has anything been left out?**

No

**58. With regards to WG8 Building Safety Managers, do you agree with all the recommendations?**

No

For the purposes of this consultation, NFCC have provided responses to those aspects directly related to competency. NFCC believe that the additional work undertaken by WG8 on the format of the new regulatory system in relation to the building safety manager, safety cases, resident engagement and fire and emergency files should be fed into Government to inform debate on the new regulatory system.

**59. With regards to WG8 Building Safety Managers, are the recommendations likely to affect you and how?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**60. With regards to WG8 Building Safety Managers, what would you like to see next?**

Continued development of the work to date. In addition, close liaison with Government on WG8 proposals in appendix B to ensure that the Group's work on the overall regulatory regime is assimilated where appropriate.

**61. With regards to WG9 Site Supervisors, do you think the analysis is correct?**

- Yes

NFCC note that the competence frameworks are missing from annex 9B therefore comment could not be made on this aspect of WG9s report.

**62. With regards to WG9 Site Supervisors, has anything been left out?**

- Yes

NFCC note that the competence frameworks are missing from annex 9B therefore comment could not be made on this aspect of WG9s report.

**63. With regards to WG9 Site Supervisors, do you agree with all the recommendations?**

- Yes

**64. With regards to WG9 Site Supervisors, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**65. With regards to WG9 Site Supervisors, what would you like to see next?**

Continued development of the work to date.

**66. With regards to WG10 Project Managers, do you think the analysis is correct?**

Yes

**67. With regards to WG10 Project Managers, has anything been left out?**

No

**68. With regards to WG10 Project Managers, do you agree with all the recommendations?**

Yes

**69. With regards to WG10 Project Managers, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**70. With regards to WG10 Project Managers, what would you like to see next?**

Continued development of the work to date.

**71. With regards to WG11 Procurement Professionals, do you think the analysis is correct?**

Yes

**72. With regards to WG11 Procurement Professionals, has anything been left out?**

No

**73. With regards to WG11 Procurement Professionals, do you agree with all the recommendations?**

Yes

**74. With regards to WG11 Procurement Professionals, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**75. With regards to WG11 Procurement Professionals, what would you like to see next?**

Continued development of the work to date.

**76. With regards to WG12 Products, do you think the analysis is correct?**

Yes

**77. With regards to WG12 Products, has anything been left out?**

No

**78. With regards to WG12 Products, do you agree with all the recommendations?**

Yes

**79. With regards to WG12 Products, are the recommendations likely to affect you and in what way?**

FRS regulate occupied premises under the Regulatory Reform (Fire Safety) Order 2005 and have statutory duties for fire safety regulation under other pieces of legislation. On this basis, ensuring that the competency of those individuals involved in the procurement, design, construction, occupation and maintenance of the built environment will support the work undertaken by Fire Safety Officers in ensuring that buildings in scope are safe and remain safe throughout their lifecycle.

**80. With regards to WG12 Products, what would you like to see next?**

Continued development of the work to date.

**81. Do you have any view on the cost, time, support, external resources, etc. needed to achieve implementation on any recommendation?**

**Cost** - It is likely that there will be costs to the fire and construction sector in the implementation of many of the Raising the Bar proposals. These should be offset over time by increased design and building construction quality leading to reduced remediation costs due to poor workmanship going forward. It may be that Government, through the Building Safety Competence Committee, financially supports basic fire safety training to prime the wheel for cultural change.

**Time** – It is likely that some sectors (such as installers) will take a protracted period of time to fully embed culture change. This will result in a weak link in the competency chain for buildings in scope. Robust oversight by independent construction assessors and Building Standards Professionals will go some way to mitigating this.

**Support** – Over the past 15 months all working groups have been run on the goodwill of individuals and organisations who have incorporated the competency work into business as usual. It is likely that this will become increasingly unsustainable for those with the greatest challenges going forward. The interim Building Safety Competence Committee / MHCLG must support this work in order for it to progress in a timely fashion.

**External resources** – NFCC supports the need for a national publicity campaign to ensure that all relevant individuals are made aware of the new competency requirements in relevant disciplines in sufficient time to enable them to meet expectations prior to the new regulatory regime being introduced.

**82. Do you consider the Competency Steering Group has covered all the important issues or are there omissions or areas you would wish to see considered?**

1. NFCC believe that individuals working on buildings in scope should be required by law to become members of appropriate professional bodies or trade organisations or demonstrate competence through third party certification. This can be expanded over time to include all buildings.
2. NFCC are of the opinion that dutyholders should be required by law to only use appropriately competent persons for buildings in scope.
3. NFCC consider that there will need to be a transition period to new competency requirements to facilitate the upskilling of existing /new staff.
4. NFCC recommend that all disciplines which rely on agency and temporary workers need to consider how competency is assured for these individuals.
5. There may be unintended consequences created as a result of the proposals. This includes existing professionals (such as Building Standards Professionals) moving to Independent Construction Assessor roles when there is already a significant shortage of professionals in this role. Moreover, consideration should be given to who dutyholders will employ to assist them with the creation of safety cases, 3D building modelling, resident engagement strategies and other elements of the new regulatory regime. Will professionals such as fire risk assessors expand into this market and will the proposed competencies and oversight be appropriate? NFCC recommends that some form of analysis is undertaken on risks, assumptions, issues and dependencies for all competency working groups under the new regime.
6. NFCC consider that all working groups need to include the following aspects within their individual competency frameworks:

- Scope (who does the Competency Framework apply to and for what building types?)
- What relevant qualifications are proposed (if any)
- Professional body registration for working on HRRBs (if relevant)
- Professional body re-registration and frequency (if relevant)
- Is the relevant professional body recommended to be accredited with UKAS / licensed by EngC (if relevant)
- What appropriate third party certification schemes are available and recommended to be used (if relevant)
- Third party certification scheme reassessment and frequency (if relevant)
- Is there UKAS accreditation of the third party certification schemes (if relevant)
- Registration with Building Safety Regulator (if relevant)
- Frequency of re-registration with Building Safety Regulator (if relevant)
- CPD requirements
- Recognised prior learning clearly defined
- Code of ethics are discussed
- Quality assurance of an individual's work and their development process
- Core competencies are listed
- Limits of competency are discussed
- Conflicts of interest are discussed
- How competency is assessed
- The standard of competency of assessors
- Agency / temporary staff competence assurance
- Whistleblowing
- How competent persons are identified (register, CSCS, warrant cards etc.)

This will deliver some measure of consistency in approach.

**83. In your opinion would the recommendations, if implemented, provide the competent people suggested as required by Building a Safer Future?**

NFCC acknowledge the scale and breadth of work that has been undertaken by all those involved in the Competency Steering Group work over the past 15 months. Bringing together representatives from key stakeholders involved in the design, construction, regulation, maintenance and operation of higher risk residential buildings to drive improved competency standards has delivered some key outcomes. This includes proposals for a Building Safety Competence Committee, identification of the need for additional roles (building safety manager and independent construction assessor) and more robust competency frameworks for individuals working on buildings in scope.

NFCC believe however, that the Government and the fire and construction industry still have a long way to go in order to ensure that a positive legacy from the Grenfell Tower tragedy - a safe built environment for all - is achieved. Raising competency standards of those working on all buildings in the built environment is a core component of assuring this. However, this is only one of many constituent parts which need to be resolved in order to ensure that successful outcomes can be achieved.