



Consultation report

Draft building inspector competence framework (BICoF)

March 2023

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Introduction

Background

The Building Safety Regulator (BSR) will be operating as part of the Health and Safety Executive (HSE) from April 2023.

Section 6 of the Building Safety Act 2022 requires the Building Safety Regulator to facilitate improvement in the competence of building inspectors and section 42 creates a new regulated profession. To facilitate the improvement in competence, and support the creation of the regulated profession, BSR is publishing a building inspector competence framework (BICoF) which provides a clear framework, setting demonstrable standards, to raise competence within the profession.

All registered building inspectors will need to demonstrate their competence against the BICoF.

At all times building inspectors must:

- be competent to undertake the tasks that are assigned to them
- not work outside their competency (unless an appropriate level of supervision from an inspector of suitable registration class, as outlined within the BICoF)
- maintain their competence

In May 2022 we published a very early draft of the proposed framework. Over the summer we met representative groups for building control to discuss and further develop the draft. A revised version was then published for public consultation in October 2022. This report summarises the outcome of the public consultation on the proposed BICoF, which will apply to all building inspectors applying for registration with BSR from October 2023.

The development of the BICoF, like other products relating to regulation of the profession such as the Operational Standards Rules (OSRs), has been an iterative process. We value all consultation responses and are using them to shape and refine our proposals.

The Building Safety Regulator would like to thank all respondents for taking the time and effort to provide this valuable feedback.

We will publish the revised building inspector competence framework in April 2023.

Public consultation

The public consultation ran from 31 October until 09 December 2022.

In consulting, HSE sought views on:

- classes of building inspector within the framework
- competence subject areas
- competency levels
- perceived knowledge levels and understanding required by professionals, measured against a level descriptor used in recognised qualification frameworks
- impact on people with protected characteristics
- any additional general comments on the building inspector competence framework

The consultation was published online and promoted via the Health and Safety Executive's building safety e-bulletin and through representative groups.

Respondents were encouraged to reply using the online questionnaire, but responses received separately were also included in the analysis. Not all respondents answered every question, and not all gave comments to support their response. A proportion of the consultation was left unanswered by some respondents. There were no postal responses.

This report includes a quantitative analysis of responses to several dichotomous questions as well as a thematic analysis of free text fields to identify key themes and sentiments.

The summary reflects the views offered, but it is not possible to describe all responses in detail. Every response has been read and considered as we further develop the building inspector competence framework.

This consultation response does not address responses related to the legislation and/or policy regarding the new regime. These matters were debated and discussed during the development of the Act, including during the Parliamentary process.

Responses

- 249 online consultation responses were received:
 - 34% of online responses said they were responding on behalf of an organisation.
 - 33% of the online responses identified as coming from local authority building control, although 43% had local authority email addresses
 - 24% of the online responses identified as coming from private sector building control
 - The remaining responses were unattributed or from professional and trade bodies and consultancies
- 20 email responses included:
 - A mix of individuals, building control organisations, professional bodies and trade associations

- A mix of answers to specific survey questions, and free text short and detailed responses

Analytical approach

Health and Safety Executive social researchers collaborated with the lead policy team to systematically analyse and interpret the 269 consultation responses. This approach:

- combined deep knowledge of the policy intent and building inspector competence framework development
- included insight from stakeholder engagement
- provided social research skills and knowledge of ethics in analysis
- gave us the ability to triangulate multiple evidence sources to maximise impacts of the evidence and assist policy decision making
- reduced analytical bias and strengthened interpretative decisions through multiple stages of theming and quality checking

The Health and Safety Executive's social researchers apply principles and methods set out in central government guidance on evaluation, The Magenta Book¹, and Social Research Association Ethics Guidelines².

The analysis team used deliberative methods to analyse and synthesise themes, issues and sentiments from the consultation responses. This consisted of:

- developing an overall picture of support for elements of the BICoF by using quantitative frequencies (percentages) and charts for questions which offer two possible answers.
- using a thematic analysis framework to organise quantitative data and corresponding free text data with respondent characteristics, e.g., whether they represented a local authority or private organisation etc.
- reviewing each response and assigning common themes (codes) which were then quality checked by another analyst
- quality checking codes and distilling into consistent and concise themes which represented the views provided in free text responses
- assessing strength of feeling by counting frequency of themes and concerns
- holding deliberative workshops with a wider group of policy and building control internal experts to discuss and contextualise findings, sentiments, concerns and implications for the BICoF and the published consultation response

All online responses were counted in the quantitative frequencies.

¹ The Magenta Book - GOV.UK (www.gov.uk)=

² [Research Ethics Guidance \(the-sra.org.uk\)](http://the-sra.org.uk)

Written responses were included in the qualitative thematic analysis. Where written responses referred to specific survey questions, they were not included in quantitative analysis to ensure:

- data were analysed thematically, in full
- data were not lost or misrepresented if data processing errors were to occur if data were retrospectively input into Citizen Space – the survey platform

During the qualitative analysis, it was observed that free text responses were given by some respondents who did support an element of the BICoF but wanted to offer suggestions for improvements or valuable context relevant to operationalisation of the BICoF.

Consultation responses

Breakdown of online quantitative responses, key themes and sentiments

A. Building classes

A1 - Class 1 Building Inspector (Associate/Assistant)

Question A1.1 Do you agree that this should be a registration class?

There were 247 responses to this part of the question with **the majority supporting this class**:

- 76% answered yes
- 23% answered no

Question A1.2. Do you agree that associate/assistant is the correct title?

There were 242 responses to this part of the question with **divided opinion on the title of this class**:

- 51% answered yes
- 46% answered no

Summary of responses to QA1.2 Supplementary - If no, what do you think it should be?

- There were 122 responses to this part of the question which were analysed qualitatively.

Question A1.3. Is there anything missing from the registration class description?

There were 235 responses to this part of the question with **the majority supporting the description as it is**:

- 28% answered yes
- 66% answered no

Summary of responses to QA1.3 Supplementary - If yes, please tell us below

There were 79 responses to this part of the question which were analysed qualitatively

Key overall themes and sentiments raised for the Class 1 Building Inspector (Associate/Assistant)

The class had overall support from 76% of respondents. Qualitative analysis presented the following themes and sentiments:

Terminology and clarity

- concerns were expressed over terminology, clarity, and operationalisation of this class
- some respondents felt the title was not reflective of the responsibility, skills and/or progression within the role
- the titles 'trainee' and/or assistant/technician were preferred
- clear distinction between building control trainees and other professions is needed within the class, for example, fire engineers, mechanical engineers

Class scope

- some respondents were unclear on the scope of this class
- some respondents did not recognise an associate as a trainee class
- there were views for and against registration of supervised trainees- however, clearly defined boundaries and responsibilities could help mitigate risks of misinterpretation and abuse of the class

Operationalising the class

- some felt too wide a gap might exist between the classes which could stifle progression/transfer into building control from other professions
- definition of 'under supervision' could aid application of this class

A2 - Class 2 Building Inspector (Standard)

Question A2.1 Do you agree that this should be a registration class?

There were 245 responses to this part of the question with **the large majority supporting this class.**

- 82% answered yes
- 16% answered no

Question A2.2. Do you agree that Class 2 Building Inspector (Standard) is the correct title?

There were 242 responses to this part of the question with **divided opinion on the title of this class.**

- 51% answered yes
- 47% answered no

Summary of responses to QA2.2 Supplementary - If no, what do you think it should be?

There were 123 responses to this part of the question which were analysed qualitatively.

Question A2.3. Is there anything missing from the registration class description?

There were 237 responses to this part of the question with a **small majority supporting the description as it is.**

- 36% answered yes
- 59% answered no

Summary of responses to QA2.3 Supplementary - If yes, please tell us below

There were 97 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for the Class 2 Building Inspector (Standard)

The class had overall support from 82% of respondents. Qualitative analysis presented the following themes and sentiments:

Terminology and clarity

- concerns were expressed over the title Building Inspector (Standard) and perceived diminishment of the profession
- some respondents preferred the terms 'surveyor' and 'general'. However, the term 'Registered Building Inspector' is derived from the definition in the Building Safety Act 2022
- clarity and differentiation are needed on the range of buildings that could be in this class, including both residential and commercial buildings

Class scope

- some respondents felt the scope of the class was vague and may benefit from sub-division
- class 2 was seen as potentially too broad in scope- some respondents highlighted that some building inspectors only work on 'low-rise' domestic projects, and some had questions on how this could be reflected in the class descriptions/registration process
- questions were posed around what level of 'complex' building is covered in this class and when a Class 3 inspector would be needed instead.
- the point was raised about whether this class applies to all work of a building inspector for example, dangerous structures, ruinous, dilapidated, and unsecured buildings

Operationalising the class

- the potential lack of opportunity/experience of working with a range of building types may lead to people not qualifying as class 2 and leaving the profession/failing to progress
- progression between classes 1 and 2- the terms 'qualified' and 'unqualified' were also noted as needing clarification

A3 - Class 3 Building Inspector (Complex/HRBs)

Question A3.1 Do you agree that this should be a registration class?

There were 245 responses to this part of the question with **the vast majority supporting this class.**

- 93% answered yes
- 5% answered no

Question A3.2. Do you agree that Class 3 Building Inspector (Complex/HRBs) is the correct title?

There were 240 responses to this part of the question with **a small majority supporting the title of this class.**

- 61% answered yes
- 36% answered no

Summary of responses to QA3.2 Supplementary - If no, what do you think it should be?

There were 94 responses to this part of the question which were analysed qualitatively.

Question A3.3. Is there anything missing from the registration class description?

There were 236 responses to this part of the question **the majority supporting the description as it is**

- 22% answered yes
- 73% answered no

Summary of responses to QA3.3 Supplementary - If yes, please tell us below

There were 237 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for the Class 3 Building Inspector (Complex/HRBs)

The class had overall support from 93% of respondents. Qualitative analysis presented the following themes and sentiments:

Terminology and clarity

- concerns were expressed over the title of this class
- many title suggestions were suggested, including, 'Specialist', 'Surveyor', 'Principal', 'Senior'
- there was a continuing theme where some respondents took issue with the phrase 'inspector'-however, the term 'Registered Building Inspector' is, as previously stated, derived from the definition in the Building Safety Act 2022
- Class 3 was seen as broad with separation into more defined work types showing potential benefits, for example, these could include hospitals, prisons, sports stadia, agricultural buildings, airports, hotels, hostels and student accommodation

Operationalising the class

- there was doubt expressed over the meaning of 'complex' in this category and whether someone had to have experience of both 'other complex' buildings and 'HRBs' to gain registration.
- some respondents expressed a feeling that someone could be competent in only complex work but not HRBs but was unsure if the individual would register as Class 2 or 3
- clarification was requested on how this class (and the others) aligns with other existing frameworks, such as the Building Safety Competence Foundation

A4 - Class 4 Building Inspector (Manager)

Question A4.1 Do you agree that this should be a registration class?

There were 244 responses to this part of the question with **the majority supporting this class**:

- 73% answered yes
- 25% answered no

Question A4.2. Do you agree that Class 4 Building Inspector (Manager) is the correct title?

There were 243 responses to this part of the question with **a small majority supporting the title for this class**.

- 59% answered yes
- 39% answered no

Summary of responses to QA4.2 Supplementary - If no, what do you think it should be?

There were 84 responses to this part of the question which were analysed qualitatively.

Question A4.3. Is there anything missing from the registration class description?

There were 237 responses to this part of the question with **the majority supporting the description as it is**.

- 27% answered yes
- 69% answered no

Summary of responses to QA4.3 Supplementary - If yes, please tell us below

There were 75 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for the Class 4 Building Inspector (Manager)

The class had overall support from 73% of respondents. Qualitative analysis presented the following themes and sentiments:

Terminology and clarity

- some respondents made suggestions for changes to the class title, including Building Control Manager, Building Surveyor Manager
- there were comments around the need for more details on the specific competencies required, particular in management skills. Some questioned whether a good manager requires operational building control skills/experience

Class scope

- some respondents commented on the need for more details on the specific competencies required, including management skills
- some respondents questioned whether a good manager requires operational building control skills/experience
- some respondents suggested splitting the class between technical and non-technical service delivery managers

Operationalising the class

- questions were raised around the value of this class, particularly if the inspector could also register at Class 2 or 3
- some respondents questioned how current managers without technical competence could meet the criteria to register

A5 - Other

Question A5.1. Are there any registration classes which you feel are missing from the BICoF?

There were 238 responses to this part of the question **which drew divided opinion.**

- 51% answered yes
- 44% answered no

Summary of responses to QA5.1 Supplementary – If yes, please tell us what additional class(es) should be included and why

There were 136 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for other classes

Clarity and delineation of class scope

- the issue of building inspectors working ‘supervised’ vs. ‘unsupervised’ was frequently mentioned, with requests for clear definition of ‘supervision’ which relates mostly to trainees, apprentices and graduates
- acknowledgement of, and differentiation for, professionals with depth of experience in a focused area, including those working solely on domestic projects, was the single-most most common issue raised in respondents’ comments
- strength of feeling around the benefits of incorporating work-types into class titles and scopes were evident -this included aiding clarity within Classes 1, 2 and 4 with suggestions for including less and more complicated domestic and commercial builds

Operationalising classes

- some felt the breadth of the classes were too large and the boundary between them was unclear
- some respondents identified a need for clarity and clear delineation of competence at each class/level to ensure individuals do not work beyond their competence and breach the Code of Conduct
- more detail on how to progress between classes is required

Affiliated professions

- questions were raised around how ‘affiliated’ professions, such as fire or structural engineering specialists, would be affected and, if necessary, recognised within these proposals

B. Competence subject areas

Question B1.1. Do you agree that these are the correct competence subject areas to be included in the BICoF?

There were 245 responses to this part of the question, with **the majority agreeing that these are the correct competence subject areas:**

- 78% answered yes
- 20% answered no

Question B1.2. Are there any competence subject areas that you believe should not be included in the BICoF?

There were 240 responses to this part of the question with **the majority supporting the inclusion of all these competence subject areas:**

- 23% answered yes
- 73% answered no

Summary of responses to QB1.2 Supplementary - If no, what do you think it should be?

There were 68 responses to this part of the question which were analysed qualitatively.

Question B1.3 Are there any competence subject areas which are currently missing from the BICoF?

There were 238 responses to this part of the question with **the majority supporting the competence subject areas as they are.**

- 37% answered yes
- 69% answered no

Summary of responses to QB1.3 Supplementary - If yes, please tell us what is missing and why this should be included

There were 70 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for competence subject areas

The competence subject areas had overall support from 78% of respondents. Qualitative analysis presented the following themes and sentiments:

Clarity, definition and coverage of subjects

- some respondents felt that defining a core set of subject areas was difficult as these would be highly variable depending on the role of the building inspector and their specific work-type
- the inclusion of warranty conditions was questioned by some respondents

- several respondents required further clarification around the inclusion of safety management and felt that this should not be site management; some questioned its inclusion altogether
- a clearer definition of activity and functions within the framework was needed.
- some respondents felt that subject areas could be combined or aligned differently for example 'technology' and 'building services' should be combined and that 'Law', 'Functions' and 'Activities' could be combined
- testing and product standards were mentioned for inclusion

Technical subjects

- some respondents felt that fire safety and structural engineering are not as clearly defined within the framework as they should be- liaison with the correct specialists was also mentioned as an essential activity within classes
- specific comments were made about a few technical areas of building control, including building services and structural safety within Class 3 (HRBs)
- data management was mentioned as a key aspect of the technology subject area, which also aligns to performance monitoring arrangements

Operationalising subjects

- some respondents felt that subjects/topics should be considered as levels of understanding, with reference being made back to the Competence Steering Group³ 'Setting the Bar report'⁴, Annex 6 from Working Group 6; and the Future of Building Control (FOB) report⁵, Section 4 for the Building Control Competence Requirements
- some respondents saw benefit in contextual assessment of competence, and weighting subject areas was also seen as an important aspect of effective operationalisation of this part of the BICoF

³ [Competence Steering Group \(CSG\) | Construction Industry Council \(cic.org.uk\)](https://www.cic.org.uk/competence-steering-group-csg/)

⁴ [Setting the Bar | Construction Industry Council \(cic.org.uk\)](https://www.cic.org.uk/setting-the-bar/)

⁵ [Recommendations on the future regulation of the Building Control Sector and Profession in England - Royal Institution of Chartered Surveyors \(RICS\)](https://www.rics.org/~/media/Files/2017/06/Recommendations-on-the-future-regulation-of-the-Building-Control-Sector-and-Profession-in-England-Royal-Institution-of-Chartered-Surveyors-RICS.pdf)

C. Competence levels

Question C1.1. There are currently four competency levels used in the BICoF. Do you agree that the description of each level is clear?

There were 243 responses to this part of the question with **the large majority agreeing that competency level descriptors are clear.**

- 78% answered yes
- 20% answered no

Summary of responses to QC1.1 Supplementary - If no, please tell us what should be amended and why

There were 57 responses to this part of the question which were analysed qualitatively.

Question C1.2. Do you agree that the competence levels outlined in the Table of Minimum Competence Requirements are correct for each registration category?

There were 237 responses to this part of the question with **the majority agreeing that the competence levels within the table of minimum requirements are correct.**

- 65% answered yes
- 31% answered no

Summary of responses to QC1.2 Supplementary - If no, please tell us what should be amended and why

There were 73 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for competence levels

A 78% majority of respondents agreed that the competence level descriptors were set out clearly at each level. Qualitative analysis presented the following themes and sentiments:

Terminology, clarity and definition

- some respondents felt there needed to be greater differentiation between levels and clearer descriptions relating to the limits of responsibility and expectations at those levels
- some respondents requested guidance and examples of how to progress through the levels
- some respondents made comments which indicated ambiguity around level definitions and requirements relative to grading required
- some respondents asked for clarification on work-types related to application and competence levels, including:
 - a definition of 'complex' in the Comprehensive understanding level
 - inclusion within the requirements of the levels that individuals need to know the limits of their own understanding

- some respondents commented that there were issues with terminology, for example competence levels should not be referred to as levels but as 'requirements', as 'levels' was seen to imply attainment by qualification
- concerns were raised around the need to avoid confusion between qualifications, experience, levels, and competency

Classes and competence levels

- some respondents proposed a class that focuses solely on domestic projects as the difference between standard and complex/HRBs is too wide of a gap
- some respondents highlighted differences between simple domestic and very complicated domestic projects which require specific knowledge or experience
- issues raised again the skill level assigned to Class 4.- would managers be expected to be more competent at some things than building inspectors, particularly management skills

Operationalisation of competence levels

- some respondents were unsure of the level of competence required and how it will be assessed
- there were concerns raised that the proposal places too large a progression between classes 1 and 2
- suggestions included BSR providing illustrative examples/guidance showing how the classes and the levels are operationalised in practice

D. Building control

Question D1.1. Is building control currently a level 6/degree equivalent qualified profession

There were 240 responses to this part of the question **which drew divided opinion.**

- 47% answered yes
- 49% answered no

Summary of responses to QD1.1 Supplementary - If no, what is it currently?

There were 143 responses to this part of the question which were analysed qualitatively.

Question D1.2. Should building control be a level 6/degree equivalent qualified profession in the future?

There were 240 responses to this part of the question with **the majority agreeing that the building control profession should be level 6 or equivalent qualified profession in the future.**

- 71% answered yes
- 26% answered no

Summary of responses to QD1.2 Supplementary - If no, what should it be?

There were 101 responses to this part of the question which were analysed qualitatively.

Question D1.3. If you believe that building control is not currently a level 6 profession but should be, what would be a reasonable and realistic timescale for transition to level 6?

There were 126 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for Building Control – level 6/degree equivalent qualified profession

A 71% majority of respondents agreed that building control should be a level 6/degree equivalent qualified profession in the future. Qualitative analysis presented the following themes and sentiments:

Is level 6 equivalent qualification reflective of the whole profession?

- a slight majority (49% as compared 47%) felt building control was not currently a degree level profession
- many respondents stated that building control should be a level 6, degree equivalent profession and commented that many new entrants will now hold relevant degrees
- however, some respondents believed that there was a need to consider alternative equivalent qualifications to degrees

- some respondents felt that level 6 might not be needed for all projects, for example, low risk projects, or for those inspectors with a great deal of experience
- it was highlighted that this level might not be proportionate/appropriate for regions with less complex buildings

Timeframe for the profession to reach level 6

- responses were split down the middle on whether building control is a level 6/degree equivalent qualified profession now- while around half of those putting a timeframe to reach degree level requirement said 3-10 years would be needed.
- the most frequently mentioned timeframe was 5 years

Demonstrating competence

- respondents recognised that currently there are multiple routes to demonstrate competence in the profession- some advocated that a degree alone, or exam, do not prove competence; and that experience (equivalent to degree/Level 6 qualification) was equally valid and needs to be recognised
- respondents asked for choice in how competence could be assessed particularly methods which focus on experience- if this is not included, it was felt that this could impact workforce retention, with concerns raised that this might force older workers to leave the profession
- there was support for competence demonstration by chartered membership of professional bodies and Continuous Professional Development (CPD); and transitioning existing qualifications

E. Protected characteristics

Question E1.1. Do you think any aspect of the BICoF will adversely impact on those with protected characteristics?

There were 238 responses to this part of the question with **the majority agreeing that people with protected characteristics would not be adversely affected.**

- 23% answered yes
- 72% answered no

Summary of responses to QD1.2 Supplementary - If yes, please tell us which aspect of the BICoF you think will adversely impact those with protected characteristics

There were 67 responses to this part of the question which were analysed qualitatively.

Question E1.2. For each aspect that you have identified, please tell us who you think will be adversely affected and how

There were 61 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for protected characteristics.

A 71% majority of respondents agreed that people with protected characteristics would not be affected by the BICoF proposals. Qualitative analysis presented the following themes and sentiments:

Older building control professionals

- some respondents were concerned that older workers would be affected, specifically, if they had to sit formal exam-based assessment- this was seen as being potentially challenging for those who might not have been in formal education for many years
- there were concerns that assessment may cause older inspectors to retire rather than take competency tests/register

Disabilities and reasonable adjustments

- some respondents felt an assessment would cause unnecessary stress and questioned whether those with dyslexia and mental health issues would receive reasonable adjustments.
- other respondents raised concerns about how those who might have difficulty physically accessing work sites will demonstrate all areas of competency.

F. Other

Question. Do you have any other comments that you wish to make on the BICoF?

There were 155 responses to this part of the question which were analysed qualitatively.

Key themes and sentiments raised for 'other comments' which were analysed qualitatively.

Qualitative analysis presented the following themes and sentiments:

Range of issues covered

- responses here were varied but many reiterated points that were made in earlier sections of the survey.

Sentiment

- there was general support for improved competency in the building control profession, and for a unified profession; however, respondents stressed the need for clarity and clear delineation of competence to ensure individuals do not work beyond their competence, and to be able to understand the limitations of their competence

Transitioning to the BICoF

- some respondents highlighted how critical a positive, transparent and confidence-building transition would be
- there were frequent mentions of how, and for how long, a transition period might take place with comments around providing time, transparency and support to help building control to familiarise with the registration requirements and operationalise the BICoF
- concerns were raised about how the building control profession is stretched with some citing capacity constraints and not enough people entering the profession
- some respondents raised concerns over resourcing and shortages of experienced professionals impeding progress

Operationalising the BICoF

- respondents' comments emphasised that methods of assessment and validation of competence should be varied and suitable for the individual building control professional- they should include experiential routes and use of professional membership as evidence of competence
- some respondents mentioned ensuring applicability of the BICoF to enable operationalised across different building control operating models in different contexts
- furthermore, comments demonstrated appetite for detail on registration requirements, roles and assessment methods
- some respondents raised concerns over practical barriers to operationalisation of the BICoF, including staff shortages, need for transitional arrangements, complexity and variation in work-types
- some further comments were made about possible difficulties in operationalising Class 4 Building Inspector (Manager)

Protected characteristics

Concerns were again raised by some respondents over equality issues relating to assessment types, age and dyslexia, and inspection types and disability

Health & Safety Executive response

Health and Safety Executive have considered the views of consultees. We respond to those views by making the following observations on the draft building inspector competence framework (BICoF). We will take all matters into consideration as we continue to develop the BICoF and associate guidance.

Following our continued engagement with the building control profession, it was pleasing to see the level of support for the BICoF generally, with most respondents supporting the BICoF on the main questions asked.

Table 1 – Summary of respondent themes identified in the consultation and the Building Safety Regulator’s (BSR) response

BICoF Theme	Theme summary	Response
Accountability:	<ul style="list-style-type: none"> There was general support for improved competency in the building control profession, and for a unified profession; however, respondents stressed the need for clarity and clear delineation of competence to ensure individuals do not work beyond their competence, and to be able to understand the limitations of their competence 	<ul style="list-style-type: none"> We will make specific reference within the BICoF to the need for individuals to recognise their accountabilities as Registered Building Inspectors within the Code of Conduct with respect to their competence. This includes recognising and understanding the limitations of their own competence and not working on projects that are beyond the limitations of their competence.
Registration classes in general	<ul style="list-style-type: none"> This links concerns about terminology, titles, scope, clarity and operationalisation of classes. Some respondents made specific reference to 	<ul style="list-style-type: none"> We will reconsider the titles used in each class. We will include further clarification and delineations on limitations of competence in specific classes and operationalisation of the BICoF.

	<p>BSR providing clearer boundaries between classes to ensure that professionals understood which class they should apply for; the boundaries of their competence and any limitations within the classes</p> <ul style="list-style-type: none"> • A greater need for clarity around the scope of classes and delineation between building types within classes so they could make informed decisions. This includes whether the BICoF could apply to other allied professions • There was a request to provide guidance on how professionals can progress between classes 	<ul style="list-style-type: none"> • We will discuss with other, relevant professions where registration and application of the BICoF may become relevant to them • We will look to provide further clarity of terms that were not understood by some respondents e.g., ‘under supervision’ and ‘complex buildings’. • We note that some respondents did not think the title ‘building inspector’ best described their role, preferring the term ‘surveyor’. The term that has been chosen for the BICoF matches that used in the Act and as is felt to be appropriate. • We will address within the BICoF how professionals may wish but are not obliged, to progress between classes
<p>Class 1 Building Inspector (Associate/Assistant)</p>	<ul style="list-style-type: none"> • Clarity of work types and individuals covered within this class was not clear. There was a request to provide more clarity for individuals so they can better make decisions on the limitations of their own competence. • Some respondents were unclear on the scope of this class and to draw a distinction between associate and a trainee. There needs to be clearly defined boundaries and responsibilities could help mitigate risks of misinterpretation and abuse of the class. 	<ul style="list-style-type: none"> • We will clarify the scope of this class and specify which professionals are expected to register. • We will develop clear boundaries and responsibilities which will mitigate risks of misinterpretation and abuse of the class. • We will look to provide clarification of the term ‘under supervision’ which relates to Class 1 and the transition from this class to Class 2.

<p>Class 2 Building Inspector (Standard)</p>	<ul style="list-style-type: none"> • Clarity of work types and individuals covered within this class was not clear. There was a request to provide more clarity for individuals so they can better make decisions on the limitations of their own competence. • Respondents felt that the breadth of this class was problematic and many suggested differentiation within the class. This included the range of building types that could be addressed in this class. 	<ul style="list-style-type: none"> • We will look to address the comments about work-type classes and their scope being too broad in some cases. We must ensure that they address the key role of a building inspector, i.e., the restricted activities and restricted functions. We will consider whether Class 2 standard can be subdivided to include differentiating those building inspectors who solely deal with domestic projects • We will provide guidance on the meaning of ‘complex’ which is used in both Class 2 and Class 3. This will help professionals decide which registration class may be most appropriate to them.
<p>Class 3 Building Inspector (Complex/HRBs)</p>	<ul style="list-style-type: none"> • Clarity of work types and individuals covered within this class was not clear particularly on ‘complex’ buildings. There was a request to provide more clarity for individuals so they can better make decisions on the limitations of their own competence. 	<ul style="list-style-type: none"> • We will provide guidance on the types of building types/projects which are included in this class so that Inspectors are clear when they need to apply for this Class. • We will confirm that this class includes inspectors who work on complex buildings or HRB’s or both.
<p>Class 4 Building Inspector (Manager)</p>	<ul style="list-style-type: none"> • Clarity is required on the specific individuals who need to register within this Class and if individuals must also register as Class 2 or 3. • There were comments around the need for more details on the specific competencies required, particular in management skills 	<ul style="list-style-type: none"> • We will clarify the scope of manager who would need to register for this class and how it links to other classes. • We will review the competencies within this class to ensure they align to the intended role

<p>Competence subject areas</p>	<ul style="list-style-type: none"> • Defining a core set of subject areas for the profession could vary between individual building inspectors depending on their individual role • Different subject areas could have greater or lesser emphasis for specific roles which could help professionals assess the boundaries of their current competent levels. • Some questions over whether all of the subject areas were equally important or relevant. 	<ul style="list-style-type: none"> • We will explore within competence verification how certain key parts of the competence subject areas could be reflected within the assessment process • We will look to re-map the competency subjects to existing guidance and new legislation. We will then amend the draft, without making wholesale changes. We will consider whether some can be combined or be better aligned. • We will look to make fire and structural safety, enforcement responsibilities and data management more prominent. • We will clarify the inclusion of safety management within the framework.
<p>Competency levels</p>	<ul style="list-style-type: none"> • Clearer level descriptions with greater differentiation. Justification needed for the number of levels selected and how these would be practically used within assessment processes • Concerns were raised around the need to avoid confusion between qualifications, experience, levels, and competency. • Some questioned the values included in the Table of Minimum Competence Requirements 	<ul style="list-style-type: none"> • We will review the description of the levels and consider whether four levels are in fact appropriate. • We will review our terminology to ensure any confusion is avoided. • Within competence verification we will consider how these levels will be operationalised within the assessment process and how a sufficient level of competence could practically be demonstrated. • We will consider developing guidance and examples of how to progress through the levels. • BSR will consider whether 'levels' is in fact the correct term as this is often seen as linking directly to qualification attainment. We will consider other terms. • Providing a definition of 'complexities' in the Comprehensive understanding level will be considered. • We will review the competency levels allocated to Managers in the Table of Minimum Competence Requirements

<p>Building control qualification equivalence</p>	<ul style="list-style-type: none"> • We note that respondents were divided over whether building control is currently a level 6/degree equivalent qualified profession, but the majority believed it should be in the future 	<ul style="list-style-type: none"> • We recognise that not everyone in the profession is currently able to demonstrate their competence through formal qualifications. BSR acknowledges that there are a number of ways for people to demonstrate their competence, many of which include at least some element of assessment of prior experience. • BSR expects that building inspectors are competent at all times to undertake their work. BSR will require all building inspectors undertaking restricted activities and functions to be able to verify their competence against the BICoF standard and be undertaking CPD. • We note the desire of the profession expressed in the consultation to become a level 6/degree equivalent qualified profession. BSR will engage with the profession on a timescale to demonstrate this, balancing the need to increase competence with maintaining capacity in the system. In the meantime, we would encourage building inspectors to take-up relevant training and qualifications appropriate to their role
<p>Protected characteristics</p>	<ul style="list-style-type: none"> • We have noted the concerns raised over how the verification of competence could impact some people with protected characteristic. 	<ul style="list-style-type: none"> • We will work with verification providers to ensure that relevant legislation is complied with.

**Operationalising
the BICoF and
linked
workstreams**

- Respondents wanted to engage with BSR as soon as possible to understand how competence will be verified within the forthcoming registration system.
- They would like BSR to develop guidance and tools to assist them in selecting the right category and ensuring they understand the limits of competence within each class
- We note the desire for there to be choices within the assessment process which are suitable to the widest range of candidates and address all aspects of the competence cycle (skills, knowledge, experience and behaviour).
- The BICoF will be published in April 2023
- BSR will communicate with the profession how competence will be verified as soon as possible to help registrants prepare.
- We will provide guidance and/or tools to help registrants select the right category and to understand the competence requirement
- Confirmation that building inspectors do not have to be competent in all building types within a class, only those that they work upon. They should not work on buildings they are not competent to deal with.
- Some respondents were unsure of the level of competence required and how it will be assessed. Suggestions included BSR providing illustrative examples/guidance showing how the classes and the levels are operationalised in practice.
- We note the comments raised about possible need for competency verification transition arrangements at the point of registration. This is being considered.
- Choice of competence assessment method will be considered as part of the process to develop the competence verification system.

Next steps

The Building Safety Regulator acknowledges the support from all the stakeholder organisations who promoted this consultation and to all the consultees who took the time to respond.

All responses have been considered within the overall analysis.

The consultation findings will feed directly into the development of the building inspector competence framework and will influence the development of the registration process and other registration products.

The building inspector competence framework will be launched in spring 2023, registration will open in October 2023 and will be mandatory from April 2024. From April 2024, only Registered Building Inspectors will be able to undertake restricted activities and advise on restricted functions, as defined in legislation. The requirement for building inspectors to verify their competence using the building inspector competence framework is a new requirement. Once introduced, the Building Safety Regulator will periodically review the framework, updating it where necessary, considering the views of the profession

