

TERMS OF REFERENCE

EXPERT PANEL - BUILDING SAFETY PROGRAMME NI

Objectives – To make recommendations to improve the NI regime for building safety; ensure a robust future regulatory system and framework; and provide assurance to residents that the buildings they live in are safe.

Issue

The NI response to Dame Hackitt's [Interim](#) and [Final Report](#) on Building Safety has identified ambiguities about where overall and specific responsibilities lie for the safety of high rise residential properties here. Separation of responsibilities for building and fire safety across a number of Departments has contributed to a lack of progress in bringing forward changes necessary to ensure citizens here are afforded the same standards of safety as residents in other parts of the UK.

The key recommendations from Dame Judith Hackitt's reports are attached at Annex A.

Requirement

The panel will be required to:

- confirm whether, and to what extent, the findings of Dame Judith Hackitt's [Interim](#) and [Final Report](#) on Building Safety are applicable to NI;
- confirm whether and to what extent subsequent measures and developments in building and fire safety in GB and the Republic of Ireland are applicable here and how these might best be delivered;
- review the current arrangements and structures for building standards and regulations here and confirm if these are fit for purpose to deliver the applicable recommendations;
- if the current arrangements/structures are not fit for purpose, provide recommendations to identify the most appropriate structures and delivery mechanisms to implement the recommendations;
- identify the scope of application: whether recommendations should apply to high-rise residential buildings, or to a wider range of residential and, potentially, other buildings; and
- develop a high level plan to implement the recommendations and any potential necessary structural changes.

Timescale

The Expert Panel should be constituted for a period of twelve months.

Panel

The Chair of the Panel will be **Professor Peter Roberts**.

The panel will comprise representatives from the following organisations:

Public Sector Representatives – Central Government	
Sharon Smyth	Chief Executive of Construction & Procurement Delivery (CPD), DoF
Frances Donnelly	Construction & Procurement Delivery (CPD), DoF (Secretariat)
Billy Black	Acting Head of Building Standards Branch (DoF)
Karen McKenna	Department of Health (DoH)
Anne McNally	DoH
Paul Price	Department for Communities (DfC) – Director of Housing Policy & Performance
Stephen Hughes	Department for Infrastructure (DfI) Roads – Principal Engineer, Engineering Services
Angus Kerr	DfI – Chief Planner & Director of Regional Planning
Colin Jack	Department for the Economy (DfE)
Public Sector Representatives – Non Departmental Public Bodies	
David Adamson	Northern Ireland Housing Executive (NIHE) – Fire Safety Manager
Paul Isherwood	Northern Ireland Housing Executive (NIHE) – Director of Asset Management
Geoff Somerville	Northern Ireland Fire & Rescue Service (NIFRS)
Public Sector Representatives – Local Government	
Alan Mayrs	Belfast City Council Building Control – Principal Building Control Surveyor
Ed Baker	Belfast City Council Planning Service
Kate Bentley	Director – Belfast City Council Planning & Building Control

Martin McCook	Building Regulation Manager Mid and East Antrim Borough Council, representing the Society of Local Authority Chief Executives (SOLACE) and Building Control NI
Eoin Devlin	Assistant Director Active and Healthy Communities Newry, Mourne and Down District Council
Donal McLaughlin	Lisburn & Castlereagh City Council – Environmental Health
University	
Ali Nadjai	University of Ulster (UU) – Professor / Director of Fire Safety Engineering Research Technology Centre
Industry Representatives	
Joseph Kilroy	Chartered Institute of Builders (CIOB), Policy & Public Affairs Manager for Ireland Scotland and Wales
Joan McCoy	Royal Society of Ulster Architects (RSUA)
Gary Strong	Royal Institute of Chartered Surveyors (RICS)

ANNEX A

Building a Safer Future - Independent Review of Building Regulations and Fire Safety - Final Report, summary of the recommendations

Parameters and principles of a new regulatory framework

Recommendation 1.1:

The new regulatory framework should apply to residential properties which are 10 or more storeys high in the first instance. New High Risk Residential Buildings (HRRB's) should be identified by the Local Planning Authority and notified to the regulator. Existing buildings in scope should be identified through other means, learning from the MHCLG Building Safety Programme experience.

Recommendation 1.2:

The government should set up a 'Joint Competent Authority'. This should comprise Local Authority Building Standards, Fire and Rescue authorities and the Health and Safety Executive, working together to maximise the focus on building safety within HRRBs across their entire life cycle. The optimum model for ensuring effective joint working should be discussed with all relevant parties, but should draw on the model set out above. The JCA should design and operate a full cost recovery model.

Recommendation 1.3:

The regulatory framework should treat the building as a single entity (a system encompassing sub-systems) and a new over-arching Approved Document should be published describing the system and the holistic analyses that must be completed when undertaking building work. This should define the requirement to understand the interactions of the system and its comprising subsystems in both normal operation and outside normal conditions.

Recommendation 1.4:

- a. A system of mandatory occurrence reporting to the JCA similar to that employed by the Civil Aviation Authority should be set up for HRRBs. The requirement to report should be for key identified dutyholders on a no-blame basis. The outputs of these reports (and statistical analysis of this data) should be publicly available. Non-reporting should be regarded as non-compliance and sanctions applied appropriately.
- b. It would be appropriate for the JCA to be a prescribed person under PIDA.
- c. For all other buildings the current CROSS scheme should be extended and strengthened to cover all engineering safety concerns and should be subject to formal review and reporting at least annually.

Design, construction and refurbishment

Recommendation 2.1:

Government should specify the key roles that will ensure that the procurement, design and construction process results in HRRBs that are safe. These should be, as a minimum, those identified in Table 1 – Key roles under the CDM Regulations. The definition of these roles should reflect those in the CDM Regulations to avoid unnecessary confusion.

Recommendation 2.2:

Government should allocate broad responsibilities to Clients, Principal Designers and Principal Contractors responsible for HRRBs as set out in Table 2 – Key responsibilities of dutyholders.

Recommendation 2.3:

Government should make the creation, maintenance and handover of relevant information an integral part of the legal responsibilities on Clients, Principal Designers and Principal Contractors undertaking building work on HRRBs. The four

information products (the digital record, the Fire and Emergency File, Full Plans and Construction Control Plan) represent a minimum requirement.

Recommendation 2.4:

Government should consider applying the key roles and responsibilities and information product recommendations to other multi-occupancy residential buildings and to institutional residential buildings whilst bearing in mind necessary adjustments to keep the requirements proportionate.

Recommendation 2.5:

The LPA should be required in law to undertake a consultation with the JCA where it identifies that a building is a HRRB. This process should also apply where planning permission for another building in the near vicinity is sought (where such a building might impact on fire service access to a HRRB). This is the first Gateway Point.

Recommendation 2.6:

Government should ensure that there is thorough assessment by the JCA of detailed design plans for HRRBs and sufficient assurance that duty holders are in place and relevant responsibilities are being met in order to give permission for building work to legally commence. This should be in line with paragraphs 2.29-2.32. This 'Full Plans Approval' is the second Gateway Point.

Recommendation 2.7:

Government should ensure that:

- a. the JCA undertakes a thorough test of the dutyholders' as-built construction of HRRBs, supported by clear documentary evidence from the Principal Contractor that the design intent has been delivered as proposed (and any changes are documented and justifiable) and that handover of key golden thread information has occurred. This should be as set out in paragraphs 2.33-2.35; and
- b. the building owner must have completed a pre-occupation Fire Risk Assessment and resident engagement strategy. All of this must be signed off by the JCA (and a safety case review cycle established) to enable occupation to commence.

This 'Completion Certificate' process is the third Gateway Point.

Recommendation 2.8:

Government should consider also applying Gateway Points 2 and 3 to other multi-occupancy residential buildings and to institutional residential buildings.

Recommendation 2.9:

a. there should be a clearer, statutory change control process that places requirements on the relevant dutyholder to notify the regulators of significant changes post-Full Plans sign-off. Within that context, two types of changes should be defined – 'major' and 'minor'.

'Major' changes would be a limited list of significant changes for example (a) changes in use, changes in number of storeys, changes in number of units or (b) changes which could impact on previously signed-off building safety plans. Major changes would require an update from the dutyholder to the JCA (for reconsideration) before such work is commenced.

'Minor' changes (i.e. all other changes) would need to be recorded and identifiable at the completion of the work for dutyholders to demonstrate that Building Regulations are still satisfied.

b. Government should consider also applying this change control process to other multi-occupancy residential buildings and to institutional residential buildings.

Recommendation 2.10:

In HRRBs, building work that is carried out by 'persons in a competent person's scheme' should be subject to full oversight by the JCA to enable it to fully discharge its duties in line with paragraph 2.38-2.39.

Recommendation 2.11:

- a. It should not be possible for a client to choose their own regulator or for a regulator to be unable to apply sanctions against a dutyholder where such action is warranted.
- b. As part of the JCA oversight of HRRBs there should be a single, streamlined, regulatory route for the provision of building control as set out in paragraphs 2.43-2.45 with oversight solely provided through Local Authority Building Control.
- c. The Approved Inspector (AI) regime should be utilised such that it can provide accredited verification and consultancy services to dutyholders; and also expand LABCs' expertise/capacity (whilst always operating under LABCs rules and standards).
- d. But no Approved Inspector can be used to provide both functions in respect of the same building work (i.e. where regulatory oversight is provided the AI must be completely independent of dutyholders).
- e. This avoidance of conflict of interest should apply to all actors in the regulatory system – so no fire and rescue authority should be able to support the JCA in its oversight of a particular building if it (i.e. the individual or the company) has provided professional design services in respect of that building through its commercial arm.
- f. Recommendations a.,b. and c. should also apply to all other multi-occupancy residential buildings and to institutional residential buildings. Recommendation d. and e. should apply to all building work.
- g. Local Authority Building Control should be re-named the Local Authority Building Standards given their new role.

Recommendation 2.12:

- a. As part of the establishment of the JCA, the fire and rescue authorities need to be engaged in a more consistent manner with a robust dispute resolution mechanism established for use by the organisations within it (as per paragraph 2.46).
- b. Comparable processes should also be adopted for other multi-occupancy residential buildings and to institutional residential buildings where Local Authority Building Standards and fire and rescue authority will also need to interact to ensure Building Regulation requirements are met.

Recommendation 2.13:

The sanctions and enforcement regime should be reinforced so that penalties are an effective deterrent against non-compliance. These stronger enforcement tools should generally look to replicate and align with the approach in the Health and Safety at Work Act. More specifically:

- a. the JCA/Local Authority Building Standards should have additional powers to issue formal Improvement and Prohibition (or 'Stop') Notices to dutyholders where there is a sufficient concern about, for example, the degree of oversight of the work; accurate record-keeping; or the likelihood of meeting Building Regulations requirements;
- b. the JCA/Local Authority Building Standards should have the clear power to require changes to work that fail to meet the Building Regulations requirements alongside any broader penalties sought;
- c. time limits for bringing prosecutions against dutyholders should be increased to five or six years for 'major' deficiencies in building requirements identified at a later date;
- d. the JCA cost recovery model should be weighed appropriately to create a fund for enforcement action to be taken where needed; and
- e. the new powers should be available, wherever appropriate, to support either the JCA or Local Authority Building Standards in respect of all non-compliant building work.

Recommendation 2.14:

Where a HRRB has not yet had its first safety case review and seeks to carry out refurbishment work then this should trigger a full safety case review as set out in paragraphs 2.58-2.59.

Once the safety case review cycle is established then further major refurbishments may also bring forward the next safety case review.

Occupation and maintenance

Recommendation 3.1:

- a. Government should specify that responsibility for the safety of all parts of a HRRB must be held by a clear, senior dutyholder which should be the building owner or superior landlord.
- b. The JCA and residents must be kept notified of the name and UK-based contact information of the dutyholder (whether that is an entity or a named person).
- c. The dutyholder must nominate a named 'building safety manager' with relevant skills, knowledge and expertise to be responsible for the day-to-day management of the building and act as a point of contact for residents. The building safety manager's name and contact information must be notified to the JCA and to residents and should be displayed in the building.

Recommendation 3.2:

Government should allocate clear responsibilities to dutyholders of HRRBs to:

- a. take such safety precautions as may reasonably be required to ensure building safety risk is reduced so far as is reasonably practicable;
- b. ensure that information management systems are in place in order to maintain relevant documentation and compile and maintain a safety case file (see paragraph 3.34);
- c. ensure that there is a resident engagement strategy and that residents receive information on fire safety in an accessible manner; and
- d. handover all of the relevant information to a new dutyholder when a building changes hands.

Recommendation 3.3:

The dutyholder for a HRRB should proactively demonstrate to the JCA through a safety case at regular intervals (as determined by level of risk) that they are discharging their responsibilities. The safety case must identify the hazards and risks, describe how risks are controlled, and describe the safety management system in place.

Recommendation 3.4:

- a. The dutyholder for a HRRB should demonstrate that the fire risk assessment for the whole building has been undertaken by someone with relevant skills, knowledge and experience and reviewed regularly (dependent on risk and as agreed with the regulator) so as to keep it up to date and particularly if:
 - there is a reason to suspect it is no longer valid;
 - they have received a notice from a regulator; or
 - there has been a significant change to the premises.
- b. The dutyholder should ensure that any recommendations/requirements outlined in the fire risk assessment are undertaken and completed in a timely manner. Fire risk assessments should be reviewed at least annually until a first safety case review has been completed, where this applies.
- c. The government should consider applying this requirement to other multi-occupancy residential buildings.

Recommendation 3.5:

- a. For HRRBs, residents should have clearer obligations in relation to maintaining safety of flats and should cooperate with the dutyholder (or building safety manager) to the extent necessary to enable them to fulfil their duty to keep the building safe for all those living there.
- b. The dutyholder should educate, influence and inspect to ensure residents meet these obligations and the JCA should be able to intervene where there is any immediate risks to persons.
- c. The government should consider applying this good practice on rights and responsibilities to other multi-occupancy residential buildings.

Recommendation 3.6:

The JCA should be empowered to regulate across all parts of a HRRB, be clearly identifiable to dutyholders and residents, and should have the following roles in the occupation and maintenance phase:

- a. hold a register of dutyholders;

- b. ensure that dutyholders meet their responsibilities through effective inspection, assessment and enforcement; and
- c. deal with immediate risk – the JCA should have powers of access to inspect the whole building and take action where necessary.

Recommendation 3.7:

- a. For HRRBs, Environmental Health Officers should raise any fire and structural safety concerns to the JCA.
- b. For other multi-occupancy residential buildings, local authorities and fire and rescue authorities should work more closely to ensure that the fire safety of the whole building is assessed and regulated effectively.

Recommendation 3.8:

For HRRBs there should be robust sanctions and strong incentives in place to drive compliance by dutyholders during occupation. The JCA should use a staged approach comprising education, statutory notices, fines and ultimately criminal sanctions.

Residents' voice

Recommendation 4.1:

- a. The dutyholder for a HRRB should have a statutory duty to proactively provide residents with a set of information that supports residents to understand the layers of protection in place to keep their building safe.
- b. The government should consider applying this requirement to other multi-occupancy residential buildings.

Recommendation 4.2:

- a. Residents of HRRBs should have the right to access fire risk assessments, safety case documentation and information on maintenance and asset management that relates to the safety of their homes.
- b. The government should consider applying this requirement to other multi-occupancy residential buildings.

Recommendation 4.3:

- a. The dutyholder for a HRRB should have a resident engagement strategy in place to support the principles of transparency of information and partnership with residents. The strategy should outline how the dutyholder will share information with residents, how they inform them of their rights and responsibilities, and how they involve residents in decision-making on changes to the building that could impact on safety.
- b. The government should consider applying this requirement to other multi-occupancy residential buildings.

Recommendation 4.4:

- a. Government should provide funding for organisations working at both local and national level to provide advice, guidance and support to residents, landlords and building owners on effective resident involvement and engagement in order to develop a national culture of engagement for residents of all tenures.
- b. This recommendation should not be limited to the residents of HRRBs – culture change for the residents of these buildings will only happen as part of a wider process of change across the sector.

Recommendation 4.5:

- a. After internal processes have been exhausted, if residents still have safety concerns about their homes, there should be a clear and quick escalation and redress route available for residents of all tenures to an independent body with access to appropriate knowledge, resources and enforcement powers.
- b. This route of redress should be open to all residents of all tenures, and not limited to those living in HRRBs.

Recommendation 4.6:

- a. The dutyholder for a HRRB should provide residents with clear information about their obligations in relation to building and fire safety, and residents should meet their obligations to ensure their own safety and that of their neighbours.
- b. The government should consider applying this requirement to other multi-occupancy residential buildings.

Competence

Recommendation 5.1:

The construction sector and fire safety sector should:

- a. demonstrate more effective leadership in relation to developing a responsible approach to delivering building safety and integrity;
- b. work with other sectors to learn and translate good practice and implement it within the sector; and
- c. develop continuous improvement approaches to competence levels.

Recommendation 5.2:

a. The professional and accreditation bodies working within the construction and fire safety sectors should continue the work started in response to the interim report and present a coherent proposal to government within one year. As a minimum, this proposal 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, including:

- the professional bodies, professions and disciplines in scope;
- its membership and governance;
- its 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, and/or whether a single competence framework for professional bodies in scope should be established;

- its role in agreeing and monitoring accreditation and reaccreditation, and the period within which the competence of individuals should be reassessed and reaccredited;
- its role in establishing a method for demonstrating or proving competence;
- Its role in establishing a method for demonstrating or proving competence;
- how the correct balance between construction sector skills and fire safety skills should be balanced; and
- 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.

b. Progress should be monitored by government, with the professional and accreditation bodies providing government with quarterly progress reports.

c. If government does not consider that the proposed approach provides the necessary assurance to the JCA, or there is evidence that the fragmented approach to the oversight of competence will continue, then government should mandate a body to establish the competence levels required and oversee its implementation.

Recommendation 5.3:

Relevant parties, along with the relevant professional bodies, should:

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 when working on HRRBs, and those offering consultancy and verification services to dutyholders.

b. This framework should 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.

c. 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.

Recommendation 5.4:

Relevant parties should work together, along with the relevant professional bodies, to develop and define a robust, comprehensive and coherent system for:

a. the competence requirements for the role of building safety manager of HRRBs; and

b. the remit of this role in introducing and overseeing the process by which residents in HRRBs would be able to access fire safety awareness training.

Guidance and monitoring to support building safety

Recommendation 6.1:

- a. Government should work towards a long term aim that guidance on how to meet the building regulations is to be owned by industry, while government sets out regulatory requirements and provides oversight of the regulatory system.
- b. Government should reserve the right to create guidance if industry has not proven that it is able or is deemed unable to produce suitable guidance.

Recommendation 6.2:

- a. The government should create a new structure to validate and assure guidance, oversee the performance of the built environment sector and provide expert advice.
- b. There should be a periodic review (at least every five years) of the effectiveness of the overall system of building regulation including accountabilities, responsibilities, guidance, and the effectiveness of the regulator.

Recommendation 6.3:

The Government should take forward the recommendations made by the Expert Group included at Appendix F. To summarise these are:

- a. clear user friendly language and formatting of the guidance (including Approved Document B);
- b. multiple points of entry for different users to the document set, to provide clear advice for different types of building work;

- c. facilitating the prioritisation of fire and structural safety while encouraging a holistic approach that considers all building safety objectives; and
- d. a building regulation manual to explain the role of the Approved Documents.

Products

Recommendation 7.1:

- a. A clearer, more transparent and more effective specification and testing regime of construction products must be developed. This should include products as they are put together as part of a system.
- b. Clear statements on what systems products can and cannot be used for should be developed and their use made essential. This should ensure significantly reduced scope for substitution of any products used in a system without further full testing. Until such time, manufacturers should ensure that they adhere to the current limitations set out in classification reports in the current regime.

We await the outcome of the English desk top studies consultation before moving forward in Wales.

- c. The scope of testing, the application of products in systems, and the resulting implications must be more clearly communicated in plain, consistent, non-technical language.

Recommendation 7.2:

- a. Manufacturers must retest products that are critical to the safety of HRRBs at least every three years. Manufacturers should consider the need to test more frequently, focusing especially on the testing of products as they operate in systems rather than individual elements.
- b. The testing of products that are critical to the safety of HRRBs should be subject to independent third party certification.
- c. The introduction of the JCA should drive the introduction of reactive testing when particular issues of concern arise regarding products installed that are critical to the safety of HRRBs.
- d. Additional test houses should be established and certified.

e. All test houses should produce an annual report providing summary details of tests carried out and the number of passes and failures reported.

Recommendation 7.3:

A simpler, more streamlined set of standards relating to the testing of products used in HRRBs, and the health and safety of people in and around those buildings, needs to be developed. This should ensure that where new standards are required, these are identified quickly and in the case of conflicting standards, that these are identified and reviewed.

Recommendation 7.4:

Test methods and standards should be maintained under a periodic review process in order to drive continuous improvement and higher performance through the development of new test methods, and encourage innovative product and system design under better quality control.

Recommendation 7.5:

- a. The construction products industry should work together to develop and agree a consistent labelling and traceability system, making use of the digital technologies that are already available and learning from other sectors.
- b. The dutyholder for any given HRRB should ensure that the documentation that supports the performance claims for products and systems incorporated within the HRRB should be maintained throughout the life cycle of a building through the golden thread of building information (see Chapter 8).

Recommendation 7.6:

- a. Government should ensure that there is a more effective enforcement, complaint investigation and market surveillance regime with national oversight to cover construction product safety.
- b. Government should consider whether this could be achieved by extending the remit of the Office for Product Safety and Standards.

c. The introduction of national level market surveillance should drive the introduction of risk-based testing of products that are critical to the safety of HRRBs.

Golden thread of building information

Recommendation 8.1:

a. Government should mandate a digital (by default) standard of record-keeping for the design, construction and during the occupation of new HRRBs. This is to include any subsequent refurbishments within those buildings.

b. Digital records are to be in a format which is appropriately open and non-proprietary with proportionate security controls.

Recommendation 8.2:

Government should work with industry to agree what information must be held in the digital record for new HRRBs.

Recommendation 8.3:

a. Government should work with industry to agree the type of information to be collected and maintained digitally (by default) to enable the safe building management of existing HRRBs.

b. Dutyholders must identify and record where gaps in the above information exist and the strategy for updating that relevant information.

Recommendation 8.4:

a. Dutyholders must hold, transfer and update information throughout the life cycle of the HRRB.

b. Information from this record is to be provided to the JCA in the event that this may be required.

Procurement and supply

Recommendation 9.1:

- a. For higher risk residential buildings (HRRBs), principal contractors and clients should devise contracts that specifically state that safety requirements must not be compromised for cost reduction.
- b. The government should consider applying this requirement to other multi-occupancy residential buildings and to institutional residential buildings.

Recommendation 9.2:

- a. For HRRBs, tenders should set out how the solution that is proposed will produce safe building outcomes, approaching the building as a system. Those procuring should use the tender review process to test whether this is the case.
- b. The government should consider applying this requirement to other multi-occupancy residential buildings and to institutional residential buildings.

Recommendation 9.3:

For HRRBs the information in the contracting documentation relating to the safety aspects should be included in the digital record set out in Chapter 8.

International examples

Recommendation 10.1:

The government should re-join the Inter-jurisdictional Regulatory Collaboration Committee (IRCC).

Interim Report

Interim report key findings

The work of the review to date has found that the current regulatory system for ensuring fire safety in high-rise and complex buildings is not fit for purpose. This applies throughout the life cycle of a building, both during construction and occupation, and is a problem connected both to the culture of the construction industry and the effectiveness of the regulators.

The key reasons for this are:

- Current regulations and guidance are too complex and unclear. This can lead to confusion and misinterpretation in their application to high-rise and complex buildings.
- Clarity of roles and responsibilities is poor. Even where there are requirements for key activities to take place across design, construction and maintenance, it is not always clear who has responsibility for making it happen.
- Despite many who demonstrate good practice, the means of assessing and ensuring the competency of key people throughout the system is inadequate. There is often no differentiation in competency requirements for those working on high-rise and complex buildings.
- Compliance, enforcement and sanctions processes are too weak. What is being designed is not what is being built and there is a lack of robust change control. The lack of meaningful sanctions does not drive the right behaviours.
- The route for residents to escalate concerns is unclear and inadequate.
- The system of product testing, marketing and quality assurance is not clear.

Direction of travel

Regulation and guidance

- The rules for ensuring high-rise and other complex buildings are built safe and remain safe should be more risk-based and proportionate. Those responsible for high-risk and complex buildings should be held to account to a higher degree.
- There should be a shift away from government solely holding the burden for updating and maintaining guidance, towards greater responsibility for the sector to specify solutions which meet the government's functional standards.
- Regulations and guidance must be simplified and unambiguous.

Roles and responsibilities

- Primary responsibility for ensuring that buildings are fit for purpose must rest with those who commission, design and build the project. Responsibility and accountability must rest with clearly identifiable senior individuals and not be wholly dispersed through the supply chain.
- Roles and responsibilities across the whole life cycle of a building must be clearer.

Competence

- There is a need to raise levels of competence and establish formal accreditation of those engaged in the fire prevention aspects of the design, construction, inspection and maintenance of high-rise residential and complex buildings.

Process, compliance and enforcement

- There needs to be a golden thread for high-rise residential and complex buildings so that the original design intent, and any subsequent changes or refurbishment, are recorded and properly reviewed, along with regular reviews of overall building integrity.
- There is a need for stronger and more effective enforcement activity, backed up with sufficiently powerful sanctions for the few who do not follow the rules.

Residents' voice and raising concerns

- Residents need to be reassured that an effective system is in place to maintain safety in their homes.
- There must be a clear, quick and effective route for residents' concerns to be addressed.

Quality assurance and products

- Products must be properly tested and certified and there is a need to ensure oversight of the quality of installation work.
- Marketing of products must be clear and easy to interpret.