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I didn't know anything about H&S or the construction industry but quickly discovered that I liked working here very much
Mark Allen, Pick Everard

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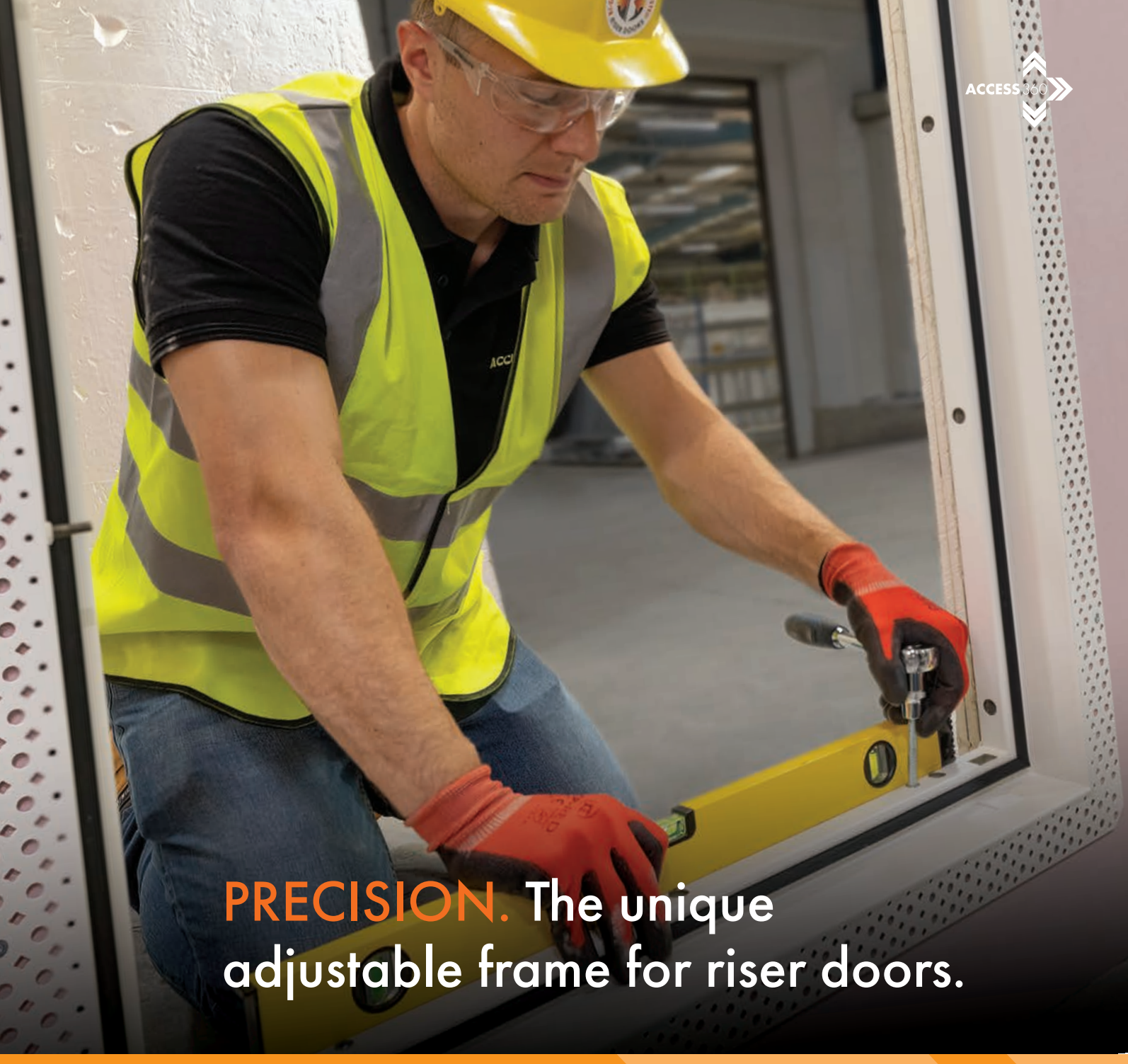

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Andrew Leslie
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Welcome

As APS looks back over 30 years, it is time to face up to the next 30. We need to address the issues that are preventing the industry from collaborating effectively to create a safer built environment, says **Andrew Leslie**

Welcome to PSJ summer 2025. For a month or so I have been seriously thinking about how to effect cultural change in an environment where partisan pressures seem to take precedence.

2017. A complacent and ambivalent construction industry led by the old guard, the older generation of professional and trade bodies crash landed into reality. Disaster – on a huge human scale. Having avoided major incidents arguably since Ronan Point, the combined efforts of an allegedly incompetent and disparate assembly of construction and trade professionals and their clients conspired to create a disaster and multiple losses of life.

Ring a bell? The human condition is confrontational and warlike. But at the same time human nature is lazy and opportunist. Take the easy way. Cut corners, Buy cheap.

Time for change.

APS has just enjoyed a celebration of 30 years contributing to the management of design and construction risk in the built environment and has come a long way in that time. So, what of the next 30 years? Where is APS heading as we enter the age of artificial intelligence? Will AI be a support to the intelligent (read here competent à la Bloom's upper levels) or a crutch to the less so – those who don't know what they don't know but boldly go where no man/woman should go anyway (apologies to JT Kirk). Aye, Cap'n, I hear you mutter.

> **APS has never been in a silo and will continue to work collaboratively with like-minded bodies in industry**
> **Andrew Leslie, Association of Project Safety**

As Dame Judith Hackitt alluded to, eight years ago, now is the time for reform (no, not that one). I'll come back to Dame Judith. So, what is holding us back? For one thing, the industry is struggling to throw off the shackles of tradition, come out of its silos and enjoy the benefits of collaboration. There is an infrastructure of departments, agencies and 'representative forums' which create an unwieldy and unworkable plethora of committees, subcommittees and working groups, all of whom want to chime in to 'advise' on a way forward for an industry now scrambling around for answers to problems of their own creation.

In early May 2025 I attended two functions in London. The rooms were full of literally hundreds of earnest professionals discussing how we could make construction a better, safer, rewarding and welcoming industry. All the conversations I had were around the topics of why is cultural and behavioural change not happening, why are post-Grenfell responses taking so long to implement and why the industry is not working collaboratively.

Not for the first time Dame Judith, speaking at the launch of another competence scheme relating to higher-risk buildings in England, welcomed the development but asked why the industry is so slow to address the competence agenda and effect the cultural change necessary to create a safer built environment.

I can't help thinking that the industry is not collaborating effectively and is still rolling out bespoke schemes for their members only. Why not work together? If competence and capability are the headline agenda items, the elephant in the room is human behaviour.

There is no evidence to date to indicate that across the construction industry there has been a cultural shift in behaviours leading to building safety and regulatory compliance at either individual or organisation levels. The silo mentality continues to this day and seems difficult to shift.

APS has already strengthened our senior management team with a view to addressing the issues facing the industry in all four jurisdictions within the UK. As a pan-industry membership organisation, APS has never been in a silo and will continue to work collaboratively with like-minded bodies in industry to address these long-standing issues with a harmonised approach – not just for the benefit of our members, but for the benefit of all those involved in the built environment.

Andrew Leslie is CEO of the Association for Project Safety.

Welsh government consults on HRB safety

Wales to follow England and adopt principal designer and principal contractor roles for building regulations

The Welsh government has set out how it is proposing to implement a more stringent building control regime to tighten responsibility and accountability for safety for those designing, constructing and operating higher-risk buildings (HRBs) across the principality.

The consultation, which closes on 25 May 2025, sets out new duties for decision-makers and fresh enforcement powers for local authorities. It forms a key part of the Welsh government's approach to adopting principles and legislation from the Building Safety Act 2022.

The act granted Welsh ministers powers to make secondary legislation, some of which is taking a different approach to that in force in England.

The Welsh government intends to adopt similar requirements to those in England by establishing a new regulatory framework for buildings classified as higher-risk and introducing new dutyholder roles that define clear responsibilities for individuals and organisations involved in building projects and align with those in England.

This includes using the same dutyholder titles as those in England which has caused confusion and come in for criticism because of the titles used under the building regulations are the same as those used in the CDM regulations, although the roles and responsibilities differ.

The Welsh government consultation acknowledges "initial feedback" that duplicating the titles 'principal designer' and 'principal contractor' is causing issues, but says it proposes to retain them so they align with other regulatory frameworks. However, it may consider amending these titles depending on feedback to the consultation.

The consultation proposes gateway processes for HRBs and the need to maintain a golden thread of information.

However, in Wales an HRB is one that is at least 18 metres tall or has at least seven storeys and also contains at least one residential unit, or is a hospital, care home or children's home.

In England, the HRB regime kicks in at the same height, but the building requires two or more residential units before being classified as an HRB.

England's more stringent building control regime for HRBs came into force in October 2023 when the Building Safety Regulator (BSR) became the building control authority for all HRBs, and a new dutyholder and competence regime was rolled out for all buildings.

A key difference in Wales is that the building control authority for HRBs will be the relevant local authority (LA). To overcome possible conflicts of interest, when a local authority carries out HRB work that it is overseen by its own building control team, the work would additionally be overseen by another local authority.

> **APS has urged all our members to get involved and make sure that your views on this important legislation are heard**
> **Bryn Wilde, APS**

A further significant proposal is the introduction of Gateways 2 and 3 as in England. Gateway 2 provides a 'hard stop' point where it will be an offence for the dutyholders to start work without approval.

In England there has been a massive backlash against the way this is being implemented, because the BSR has been missing its statutory time limits for decisions to be made, leading to long delays starting on site.

APS president elect Bryn Wilde and fellow Welsh board member Ceri Camilleri have met with the Welsh Government Building Regulations Team and cross-party elected members in the Senedd to put forward the views of APS and its members.

Wilde said: "APS will be responding fully on the consultation document and has urged all our members to get involved and make sure that your views on this important legislation are heard." ●

RICHARD SZWEJKOWSKI

Below: New higher risk residential buildings in Wales will come under tighter scrutiny (pictured Cardiff skyline)

Clockwise from top left: Chris Ottaway, Helena Knight, Peter Taylor and Richard Wilks

Four new directors appointed to board

New APS directors bring extensive experience to role

Four new directors have joined the APS board. Chris Ottaway, Helena Knight, Peter Taylor and Richard Wilks bring a wealth of experience at the highest levels.

Ottaway, managing director of Ottawayconsultants, has been instrumental in guiding contractors, developers and organisations through complex regulatory landscapes, ensuring best practices in project safety and risk management.

His expertise in ISO certifications, particularly in ISO 9001, ISO 14001 and ISO 45001, further strengthens his ability to support organisations in achieving compliance and best practice standards.

"It's an honour and a privilege to be a director of APS. Having been a very satisfied member for many years, it will be great to get involved in assisting the association grow to the next level. I feel this role has come at the right time in my career," he said.

Helena Knight brings over 20 years in CDM consultancy services. As managing director of GHPC Group, she has delivered principal designer services and H&S advisory services for strategic masterplanning developments comprising infrastructure, mixed-use and residential. She has experience across sectors including commercial, retail, education, leisure, defence and rail.

Under Knight's leadership, the company has delivered CDM principal designer services on Twickenham Station, Newbury Racecourse (infrastructure and residential), Great Western Park Didcot and a wide range of strategic developments.

As co-chair of the CONIAC Supporting Small Employers Group for over three years, she has contributed to CDM and H&S guidance infographics for industry SMEs.

The third new board member, Peter Taylor, is a partner at Leslie Clark, taking a leading role in the provision of CDM consultancy services. He is the director of APS's National Members Regional Group (NMRG), sponsor of APS London Branch and secretary of the London IIRSM Committee.

Taylor has extensive experience in the commercial, industrial, leisure and retail sectors, across projects of varying size and complexity.

The fourth new member, Richard Wilks, has been involved in CDM since 1995 and was recently chief risk officer (CRO) for Bell UK companies overseeing all CDM design risk management issues and running a risk management department for the whole group. ●

> **Having been a very satisfied member for many years, it will be great to get involved in assisting the association grow to the next level**
> **Chris Ottaway, APS**

News in brief

Uncertified doorsets

The Office for Product Safety and Standards (OPSS) has warned that external panic or emergency exit door sets are being supplied to the construction market without the necessary third-party certification.

The Door & Hardware Federation (DHF) and the Guild of Architectural Ironmongers (GAI) said the OPSS had informed them that they were aware of cases where door sets had been supplied, conformity marked against the industry standard EN 14351-1:2006+A2:2016, but not third-party certified.

Rail near miss

The rail accident watchdog has released a report after a Keltbray Infrastructure Services track worker was involved in a near miss at Chiltern Green in April 2024. A train travelling at 104mph (167kmh) came very close to striking the worker, who was crossing an underbridge between Harpenden and Luton Airport Parkway stations.

The Rail Accident Investigation Branch (RAIB) found that the worker, who was carrying out telecommunications cable testing had crossed the bridge without an effective safe system of work in place, despite being aware of the risks in doing so.

AI warning

Companies have been warned by accreditation organisation Consolidated Fork Truck Services (CFTS) about using guidance generated by artificial intelligence (AI) to comply with lifting and work equipment regulations.

It warned against relying on answers about the regulations generated by AI tools such as ChatGPT, Gemini and Copilot.

CFTS said AI can fail to clarify that different types of equipment have different inspection needs and often simplifies complex legal requirements.

The Lifting Operations and Lifting Equipment Regulations (LOLER) and Provision and Use of Work Equipment Regulations (PUWER) govern safe lifting and machinery operations.

See AI feature, p10.

Compliant clients are key to safety

Construction is feeling the effects of sluggish growth, rising costs and skills shortages – and delays in planning approvals caused by new safety legislation are not helping. But that doesn't mean compliance is bad for business, argues **Rachel Davidson**

Construction Leadership Council (CLC) co-chair Mark Reynolds recently warned members of the parliamentary Housing Communities and Local Government Committee that long delays in gaining sign-off for fire safety design were directly responsible for a wave of job losses across the industry. He said some higher-risk building (HRB) approvals were taking up to 48 weeks at planning Gateway 2 – four times the period specified in the building regulations.

Additional costs to clients are running into millions of pounds and many projects are becoming unviable. A shortage of skilled people able to assess and sign off applications is at the root of the problem, but so is the industry's failure to provide the necessary fully planned detail.

Reynolds said he had some sympathy for the Building Safety Regulator (BSR) because of multiple teething problems setting up the new system, but said the industry was increasingly confused about what it was being asked to do and needed better guidance.

Reality check

This is a reality check for our politicians, but it is not them who will deliver safer buildings. Few understand how the construction process works, but by accepting all the recommendations of the Grenfell Tower public inquiry and its share of the blame for past failings, the government can claim it is already playing its part.

The Building Engineering Services Association (BESA) is also trying to make sense of it all and ensure our members are able to meet their responsibilities.

There are plenty of challenges in the process, but the fundamental weakness BESA members see is the failure of clients to engage with the new safety culture.

Many simply see the mounting costs and delivery obstacles – and look for ways to evade them rather than working with us to ensure a better outcome for all.

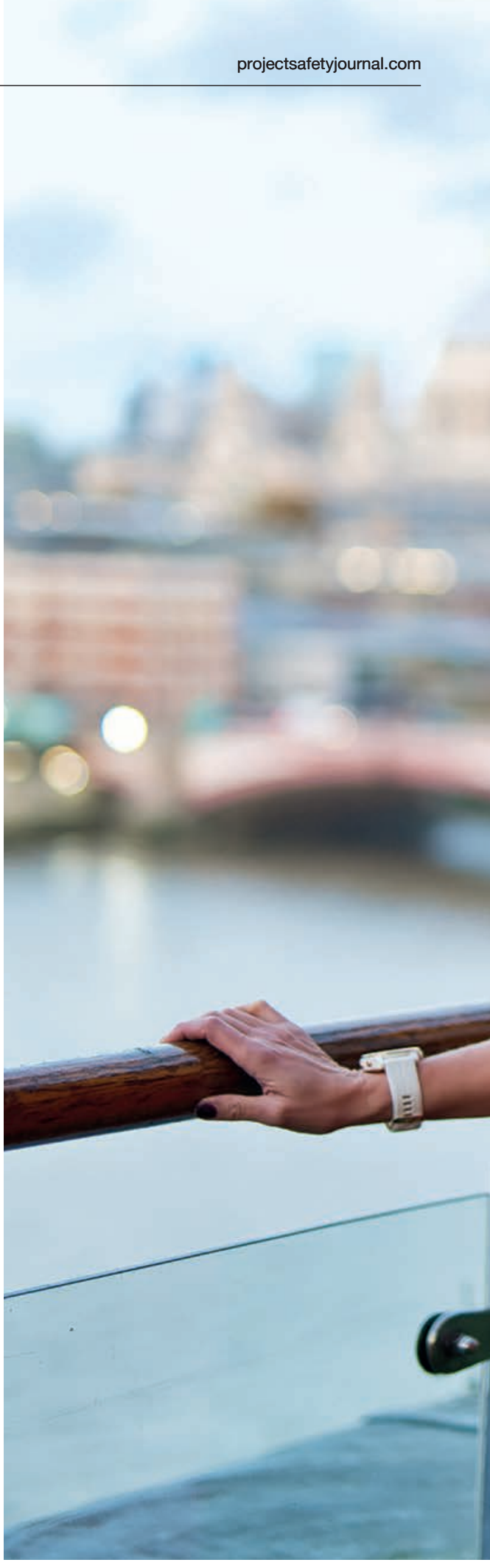
That is why BESA will soon be launching a 'Compliant Client' campaign. This is designed to educate (not intimidate) and point out why it is important that clients get behind this and why it is in their best interests.

Clients – be they developers, major contractors, housing associations, landlords, commercial or residential tenants – do not want poor quality, unsafe buildings. There is no financial or social rationale that makes a bad building a good investment.

So, getting this right is the best way to get the best return on your investment (ROI). Yet, many clients start value engineering designs as soon as they see them – long before anyone puts a shovel in the ground. Why?

If a good quality, safe building is predicted (at concept design) to cost, say, £10m to build, why should

"Many clients simply see the mounting costs and delivery obstacles – and look for ways to evade them rather than working with us to ensure a better outcome for all



“Clients – be they developers, major contractors, housing associations, landlords, commercial or residential tenants – do not want poor quality, unsafe buildings

a client expect to get the same building for £9m? They won’t. The result will be a different building – a worse one.

Obviously, there is a trust element here – and the industry has lost the trust of many of its clients, but surely the solution is not to immediately start arguing about the price but rather focus on getting the design right.

And that is exactly what the legislation and the BSR is asking for. Proper, detailed and fully developed design at each planning gateway. Surely that is what we should be striving for anyway, with or without legislation?

Necessary expertise

The current delays at Gateway 2 will only be reproduced at Gateway 3, leading to more hold-ups at the building occupation stage, if we don’t focus on getting design details right from the outset.

However, quality does not come cheap. The process will not improve if the current payment model continues. People need to be paid fairly and promptly to put in the time and recruit the necessary expertise.

If you start off from a position where you are immediately price-gouging, you perpetuate the corner-cutting culture that got us into this mess in the first place.

You will also cost yourself a lot more further down the line, including avoidable remediation work and ongoing underperformance of building systems. The investment up front pays off in the long term… and you will be a compliant client on the right side of the law and the moral argument.

Because let’s not forget why we are here. Grenfell shone a light on why proper design work and accountability matter. So, clients, we are where we are. But without you, we will not get to where we need to be. ■

Rachel Davidson is director of specialist knowledge at the Building Engineering Services Association (BESA).

Artificial intelligence – your new assistant

Away from all the scaremongering headlines, AI is playing a valuable supporting role in health and safety on a site near you. **Denise Chevin** talks to some of the people making use of it

> **Technology doesn't care about ethics or limitations, so the onus is on you to know what you want to do with it**
> **Gena Ibraev, Shirley Parsons**

From smart assistants like Siri via navigation apps like Google Maps to predictive text and online chatbots, artificial intelligence (AI) has become woven into our everyday lives without many of us even noticing it.

But over the past 18 months, AI has been advancing at pace, with the likes of large language models (LLMs) such as ChatGPT and Microsoft Copilot, which use deep learning from vast amounts of data taken from the internet (or internal documents) to analyse and understand text or images and then generate their own output based on prompts provided by the user. Reports can be generated in a fraction of the time.

The result is providing everyone with their own assistant – or, as one person described it, "a very smart intern that sometimes gets things wrong". These tools are revolutionising the workplace.

AI is beginning to play a growing and transformative role in improving health and safety on construction sites, as well as assisting CDM coordinators and health and safety professionals.

It is still early days and you might not be able to trust a risk assessment from ChatGPT yet without some very careful scrutiny, but the message from experts is very clear: ignore at your peril.

So, what is AI and how is it being used to aid health and safety in construction?

AI refers to the development of computer systems that can perform tasks that normally require human intelligence. These include things like understanding speech, recognising images, translating languages, making decisions and learning from experience.

It has been making its way onto construction sites in several technologies, often with the multiple aims of increasing efficiency, quality and safety – and sometimes by putting people out of harm's way.

These functions include using robots to do surveying tasks in dangerous areas, like Boston Dynamics' dog-like Spot. This quadrupedal robot is being used at the Sellafield nuclear site in Cumbria, for example, to assist with decommissioning and cleanup efforts.

Training is another area that is benefiting enormously (see box, p13), while wearable sensors that alerted workers if they were too close to each proved helpful during Covid, for example.

But AI is now increasingly being used on construction sites to proactively manage health and safety risks. Gena Ibraev, a principal consultant at professional services business Shirley Parsons, recently delivered a CPD webinar for APS on the role of AI technology in construction project safety.

The session focused on how AI tools can enhance safety assurance in construction projects, concentrating on two main advances – the use of LLMs such as ChatGPT for producing risk assessments, and the use of computer vision coupled with predictive analytics.

The latter is where AI-powered cameras monitor live site activity to ensure workers are wearing the correct personal protective equipment (PPE), such as hard hats, hi-vis vests, and harnesses. Ibraev showed by how this can work by demonstrating the software tool DeepX. Systems like this can flag when individuals enter restricted or hazardous areas, triggering real-time alerts to site managers.

Combined with predictive analytics, this type of software can suggest when and where accidents are most likely to occur, either through historical data or through forecasting.

For example, if data shows a pattern of slips and falls on wet surfaces near scaffolding during early morning shifts, site supervisors can be prompted to increase monitoring or adjust work schedules accordingly. Or forecasting the trajectory of moving vehicles on site in real time from the site camera system can be used to alert drivers if it was likely they would crash.

Below: BAM Nuttall has trialled Spot, a dog-like robot, on a remote Shetlands site

Automated risk assessments

One of the emerging trends that could have the biggest impact on health and safety professionals is the use of AI software based on LLMs like ChatGPT to help generate risk assessments.

Ibraev demonstrated how uploading a picture into ChatGPT of, say, a trench, means that, with the right prompts, the software can have a good stab at providing a comprehensive risk assessment within a few seconds.

The software can be 'trained' into using company HSE protocols, terminology and can use RAG ratings. But, as Ibraev pointed out, it is not infallible, and there were a few key areas that it missed.

Another issue is, as he says, technology does not know its own limitations and will produce a risk assessment even when it is not given the full context of the situation.

"Technology doesn't care about ethics or limitations, so the onus is on you to know what you want to do with it," he says. ►

BAM NUTTALL

Above: Virtual reality headsets can be used for immersive safety training

Ibraev's view, and that of others interviewed, is that this technology can provide a good starting-off point, but it still needs a professional to scrutinise the information.

Specialist mobile phone apps that can generate risk assessments from photos taken by field workers have been available for some time. These can be quickly emailed back to specialist H&S professionals at base, to scrutinise whether what has been generated is adequate or not.

"It means they save a lot of time," Ibraev commented in the webinar.

Ibraev says that the arrival of systems like ChatGPT may sound scary, as professionals wonder if it is going to put them out of a job – and there may be sceptical firms that ban its use altogether.

He warns against this: "As minimum, you need to be aware of it – and in some ways it gives more importance to your role as professionals to critically assess what you have been given, for example, by your subcontractors."

Fran Watkins-White, head of CDM services at Bureau Veritas UK, is among the early adopters championing AI in the organisation. Her focus is on using AI to streamline processes in the CDM domain and beyond, exploring how it can alleviate manual workloads and enhance technical oversight.

One of the key areas she is targeting is the collation and consolidation of risk registers. Typically, this involves gathering disparate information from architects, engineers and stakeholders to form a cohesive document.

"You spend a lot of time pulling together information from different consultants and putting it into one document," Watkins-White explains.

"AI, in this context, acts as a valuable assistant, allowing professionals to focus on high-value tasks, ie, reviewing and technical oversight of information, rather than administrative collation."

Bureau Veritas is using an in-house AI solution – in preference to commercial models like ChatGPT – which provides the security required for handling data.

"It's our in-house version, which means it's secure, so information doesn't leave the business systems," Watkins-White notes. This tailored AI can be trained to perform specific tasks, such as reviewing documents and extracting key points, making it a versatile tool in her daily work.

The initiative is gradually being rolled out across the company, with all employees now having access to the AI tool from their desktops. The goal is to encourage exploration, with Watkins-White and her fellow ambassadors providing guidance.

> **"AI acts as a valuable assistant, allowing professionals to focus on high-value tasks, ie, reviewing and technical oversight of information**
> **Fran Watkins-White, Bureau Veritas UK**

In terms of potential, she sees AI playing a significant role in supporting CDM professionals – not replacing them. "You still need technical brains to review and provide oversight," she emphasises. "But you use AI to support process and production... to do it quicker and more speedily."

Watkins-White envisions AI evolving to help review design drawings, identify safety compliance issues and even generate key questions for design teams based on visual inputs.

She is candid about the limitations and evolving nature of AI. "It's only as good as how it's learned," she cautions. "If you give it the wrong questions, it will give you the wrong answers."

James Hymers, who runs his own consultancy Honest Safety, has also been exploring its use to generate risk assessments using Microsoft Copilot.

He has been impressed that the software generates detailed risks even in very specialised areas – such as working with rare earth metal magnets. He has also been impressed by the reports' structure. But, like others, he says using AI in this way must be treated with caution.

Seb Corby, principal consultant at Safetytech Accelerator, which brings together technology startups with industry partners, is working closely with HSE to understand how AI can enhance compliance without compromising accuracy – and how new technologies can be implemented in safety-critical environments.

He says that there is an acknowledgement that companies are spending huge amounts of time on paperwork but HSE needs to ensure the tools used to automate compliance are genuinely effective.

One of the key insights from the evaluations is that many AI tools simply aren't accurate enough to be trusted with safety-critical decisions. This is especially true for LLMs, like ChatGPT, which can produce plausible but sometimes incorrect answers.The bottom line, Corby says, is: "We're not quite there."

A major barrier is the inconsistency in how safety data is captured, logged and interpreted across the industry. Without a shared taxonomy – for example, whether a hazard is called a “risk”, “condition” or “event” – it’s nearly impossible to analyse data effectively at scale. This issue is something HSE, tech developers and construction firms must solve together.

Like others, Corby points to the shift toward AI that assists workers rather than replaces them as a promising development. This includes FYLD (see box), a platform which allows users to conduct risk assessments by filming a site and narrating what they see. The system analyses footage to generate assessments – even evaluating whether the user appears alert.

Looking ahead, he believes the biggest breakthroughs may come not from AI alone, but from improvements like greater automation. “Taking people out of dangerous environments altogether might ultimately reduce the need for reactive safety systems. But that’s still a long way off.”

“People forget electricity took 50 years to have an impact on productivity,” he notes. “We’re still early. There have been a lot of important failures – finding out what doesn’t work is progress too.” ■

Below: Skanska is using Schindler’s RISE elevator shaft robot on site in London

Four ways AI is helping to improve safety

A plethora of new AI-driven tools are appearing in construction that in various ways are geared to improving safety and productivity. Here’s four

FYLD

A field worker films a 30-second video using the FYLD app

● The **FYLD** app uses video analytics and AI to help operatives and managers identify and record hazards and control measures they see in their work environment. Using the app, field workers take 30-second videos of their site, talking through hazards that are present or noticeably absent.

The software’s AI-engine then reviews the video and audio data and generates a visual risk assessment (VRA) with a bullet-point list of potential risks and proposed control measures.

Field workers can assess and amend the VRA before sharing it with a remote manager for their review and input. The Kier Highways team on the National Highways Area 13 contract used Fyld to conduct risk assessments up to 85% faster.

● **DeepX** employs AI-driven computer vision systems to automatically detect whether workers are wearing the required PPE, such as helmets, safety vests and gloves. This real-time monitoring ensures adherence to safety protocols and helps maintain compliance with regulations.

By reducing manual oversight, these systems minimise human error and enhance overall safety on construction sites.

Through continuous video analysis, DeepEx’s technology identifies potential safety hazards, such as unsafe worker behaviours, unauthorised access to restricted areas or equipment malfunctions. The system provides immediate alerts to supervisors, enabling prompt corrective actions and preventing accidents before they occur.

● Skanska has recently deployed the **Schindler Robotic Installation System for Elevators (RISE)** at the 105 Victoria Street project in central London. This is the first time this technology has been used in the UK.

Schindler RISE is a self-climbing robot designed to navigate elevator shafts independently while installing components with “precision and speed”.

Equipped with tools to drill holes and install anchor bolts, it significantly reduces human involvement in this part of the process. Such tasks can lead to fatigue when performed at height, but using a robot eliminates this risk. The specialist operator monitors the robot’s movements via a remote-control panel.

● **SafeXtend** is an adaptive learning system designed for educational and training environments that uses an advanced virtual reality (VR) training platform powered by AI.

This provides an immersive, interactive learning experience for construction workers, by providing accurate simulations of construction sites, in which personnel can engage in realistic scenarios that include risk assessment and safety protocol training.

The system claims to be able to evaluate trainee performance and for employers to monitor training effectiveness.

The golden thread – what should it really contain?

Anthony Taylor, chair of the Building Safety Alliance, introduces new guidance for all dutyholders involved in the design, construction or management of higher-risk buildings

We have heard an awful lot about what the golden thread really is – not least through webinars and promo leaflets from IT platform providers claiming that their system does it all!

The concept has been in gestation for a long time in the guise of government's drive to a digital economy. We have also had building information modelling (BIM), digital twins and other proposals for several years, increasing in sophistication.

As a result of Dame Judith Hackitt's report on the failures which led to the tragedy of Grenfell, much effort has gone into devising a system to manage and maintain processes and information to assure safe buildings are delivered, then managed and maintained properly for their whole life cycle.

As the building safety bill was being developed, finally becoming the Building Safety Act 2022 (BSA), so was work to bring a golden thread of information into a practical existence.

This was described early on as:

- The information about a building that allows someone to understand a building and keep it safe.

Anthony Taylor
Building Safety Alliance

- The information management systems and processes to ensure the information is accurate, easily understandable, can be accessed by those who need it and is up to date.

It was also decided that this was to be totally electronic, and maintained in a format so that the information (data and documents) could be transferred between IT systems with "ease".

Given the very rapid development across the IT environment, this was never going to be easy. Major projects have long had significant dependence on the transfer of digital information – using task-specific systems to manage design, clash-detection, BIM and the collation of operation and maintenance (O&M) manuals and health and safety (H&S) files etc, from paper-based through floppy disks, CD, DVD, networks and the cloud.

However the 'in occupation' teams have been focused on completely different task-specific platforms, including those used to manage maintenance contractors, the financial side of property management, delivery of facility management services and 'compliance' across all of them.

We also have a very real issue where design and construction information has traditionally been collated through work packages (the contract arrangements through which the work was let) and delivered to occupiers in a manner that suited these arrangements – inconsistent, unstructured and haphazard information-sharing, based on pot luck principles.

Information was commonly labelled "as designed" or "for construction" as opposed to being signed off as "as constructed" (or similar). This left the occupiers with the problem of sifting through significant volumes of digital files looking for the precise information they needed to deliver their function(s) – and potentially with the obligation to double-check the information they had been given was up to date and accurate – or trying to fill gaps where the information doesn't exist.

Furthermore, very few occupier teams currently have the resources or the know-how to use BIM, so this information often becomes out of date/inaccurate almost immediately as the occupier teams take on their responsibilities, and have to go off and

populate afresh whatever their platform requires to deliver their obligations.

The golden thread requirements are designed to meet all these frustrations. This will not be a magic bullet but, when implemented properly, will help manage building safety risk better and then evidence how the risks are being managed – giving greater confidence about building safety and delivering clear accountability.

There is clear law through the Higher-Risk Buildings (Keeping and Provision of Information etc) (England) Regulations 2023, which set out at high level what the golden thread content is expected to be.

In August 2024, the Construction Leadership Council and the Building Advisory Committee jointly published Delivering the Golden Thread: Guidance for Dutyholders and Accountable Persons. This is relevant for all dutyholders involved in the design, construction or management of higher-risk buildings (HRBs) and is free to download at www.constructionleadershipcouncil.co.uk/wp-content/uploads/2024/08/CLC-Golden-Thread-Guidance.pdf.

> **This will not be a magic bullet but, when implemented properly, will help manage building safety risk better**

Detailed guidance

More information was published in April 2025 by the Building Safety Alliance, a charity devoted to providing guidance to the "occupied residential sector" at https://buildingsafetyalliance.org.uk.

This guidance is more detailed and includes a list of information required by the BSA and Fire Safety Act 2021, with reference to where in the law the information is required (helpful if challenged by those having to pay to manage the golden thread).

It also has Uniclass codes (www.thenbs.com/our-tools/uniclass) to assist in the assignation and transfer of documents, and guidance for data managers responsible for uploading the data to an IT platform.

Developed through cross-sector collaboration, the guidance is in three parts, and includes some of the most relevant requirements of the BSA to support those responsible for management of HRBs.

All in all, the golden thread legal requirements are intended to be focused on two distinct matters:

- During the design and construction phase, to retain the evidence that the building was both designed and constructed in full compliance with building regulations.

It is required, and will be reviewed, as part of the Gateway 3 (application for completion certificate) by the Building Safety Regulator, the building control authority for all "building works" to construct a new HRB, or in regard to work undertaken within an existing one.

Part of this application also includes the requirement for the golden thread information, which must be: "provided in such a way as to retain the filing structure in which it was kept, including each index, key or other information logically associated with it and in a format which enables the relevant person to read, keep and update the information".

The person who receives it [accountable person (AP) or responsible person (RP)] "must give the client a notice acknowledging receipt of the specified golden thread information which confirms:

> **Very few occupier teams currently have the resources or the know-how to use BIM, so information often becomes out of date almost immediately**

(a) they are able to access the information, and
(b) the information provided is sufficient to enable them to understand, operate and maintain the building (and the fire safety systems in it) after the building work".

Without the above declaration the project delivery team will not get completion, and any "relevant person" – which could include a number of responsible persons in a mixed-use residential building as well as the (principal) accountable person [(P)AP] – would be foolish not to audit the information to establish it is what they need in a format they can work with, before taking responsibility for it.

- During the life cycle of the management/occupation of the building, to provide the information the dutyholders (the (P)AP and any they employ to assist them in executing their duties) need to execute their duty to manage "building safety risk" (spread of fire, and structural safety).

Best practice

However, much of the guidance on offer will advise those managing HRBs that if you have a working system to deliver the golden thread, in relation to management of building safety risk, there is always the opportunity to use the same system for managing all the other risks (eg, health and safety related) required by other laws – indeed it is, in the opinion of the author, recognised best practice.

If you have a wide portfolio of buildings for which you have to keep a golden thread for each – well, that too is another story, with complications, and needs considerable planning.

Similarly, given the significantly increased liabilities brought into existence by the BSA and its more than 30 or so regulations, why would you not keep a "digital record" of your work, whether or not it relates to an HRB and requires a golden thread. ■

For further guidance on the golden thread, or the need for a digital record, contact the author or the Building Safety Alliance at anthony.taylor@resolvegroup.co.uk.

‘I was surprised that I liked working with legislation’

Don’t be afraid to ask questions, Mark Allen, Pick Everard’s director of health and safety, tells his younger self. He’d also like to see an increased awareness of CDM for newly qualified architects and engineers

Multi-disciplinary consultancy Pick Everard has expanded its health and safety (H&S) team, and appointed Mark Allen as director of health and safety.

Allen brings 11 years of experience and expertise in construction, design, and management (CDM), particularly as a principal designer.

In his new role, Allen, an incorporated member of APS, will focus on developing industry-leading processes, strengthening collaboration within the fast-growing team and establishing additional regional teams. He will also support Pick Everard’s national Building Safety Act (BSA) and building regulations principal designer team with its growth plans.

Talk us through your new role and your team.
I was appointed as director of health and safety last December. The role is new to the health and safety team and arises from growing staff numbers and client demand.

We currently have nearly 40 H&S employees, backed up by 700+ employees across Pick Everard. We support the wider Pick Everard multi-disciplinary teams in delivering national frameworks alongside our own standalone clients.

Pick Everard itself delivers full multi-disciplinary construction consultancy services across the built environment.

And a bit about your career to date?
My career has been fairly linear since stepping away from the recruitment industry to retrain as an assistant consultant just over 11 years ago. I have progressed through the consultant, senior associate and associate director roles, gaining new experiences in line with qualifications and industry memberships.

For the last nine years I have focused exclusively on construction and the built environment, working predominantly as a CDM principal designer and CDM adviser, before more recently branching into the Building Safety Act and building regulations principal designer role.

What type of projects have you worked on, and what have been the most satisfying and memorable moments?
A very broad range, but I look back on three particular career highlights. Firstly, spending four and a half years as the lead consultant for Derisk UK with Royal Borough of Kensington & Chelsea on the Lancaster West Estate refurbishment works and wider major capital works team.

Of the buildings I worked with, I particularly remember Treadgold House, which recently underwent the UK’s first multi-storey residential housing Energiesprong retrofit as part of the estate’s plan to be carbon net zero by 2030.

Energiesprong is a programme that originated in the Netherlands that introduces and retrofits houses to satisfy energy-efficient standards.

Secondly, when I was at Ridge & Partners, I worked for just over three years with the Imperial War Museum, operating across their Duxford Airfield, Lambeth Road museum and HMS Belfast sites. Getting behind the scenes, particularly at Duxford, was a fascinating experience.

And thirdly, also at Ridge, I worked on some major refurbishment projects that transformed the Cumberland Hotel, in central London, including setting up the UK’s first Hard Rock Hotel.

Another personal favourite wasn’t a notable project but going onto the roof of Trellick Tower (31 storeys) a few years ago was amazing – looking down at central London from that height was just incredible.

I’ve also worked extensively with several London and home counties councils, various educational trusts, national housing developers and NHS trusts.

CV: Mark Allen

- **2024 to present: Director, design & construction safety, Pick Everard**
- **2021-24: Associate director, Derisk UK**
- **2019-21: Associate consultant, Derisk UK**
- **2016-19: Senior CDM/ health & safety consultant, Ridge & Partners**
- **2014-16: Health & safety consultant, Botson Daniels & Associates**
- **2007-14: Various recruitment consultancy roles**

What drew you to H&S?
I started out after school in the healthcare recruitment industry but after nine years I needed a change. I didn’t know anything about H&S or the construction industry but quickly discovered that I liked working here very much.

Starting again as a trainee/ assistant in a small consultancy was a sharp learning curve, but I enjoyed combining site works and face-to-face people contact, along with understanding all the legal obligations.

I was surprised to find that I liked working with legislation, and to this day I still try to seize opportunities for learning as much as I can about it.

What is your experience so far of delivering on the Building Safety Act? Are there any clarifications or areas that would be useful to see ironed out with the regulator?
My personal experience has focused mainly on the building regulations principal designer role, and developing a better practical understanding of the BSA was a significant factor in joining Pick Everard.

I share wider industry concerns around the delays in place for Gateway 2 and 3 applications. The system seems under-resourced and there are so many projects to be assessed, far more than I think was anticipated. In my opinion, self-certification schemes for less complex works to HRBs should be considered.

Mark Allen: 'Increased awareness of CDM for newly qualified persons will improve attitudes'

Do you have any thoughts on the main recommendations that the government will be adopting following its response to the Grenfell phase 2 recommendations?
Broadly I welcome all of the recommendations. I consider the proposed 'review of the definition of higher-risk buildings' is a key recommendation – the practical implementation of the current definition doesn't align with a risk-based approach that I feel it should be. How is a traditionally built eight-storey residential block a higher risk than a hotel above a pub?

I have reservations about the 'licensing of contractors to work on higher-risk buildings' recommendation. History tells us that this approach could result in a small pool of approved contractors holding a monopoly in the market – and would most likely lead to increased costs and procurement delays for construction programmes.

> **"A fundamental issue with CDM for me is a general lack of education. It seems to be a very small item on the syllabus**
> **Mark Allen, Pick Everard**

I understand the CDM regulations are being reviewed – do you think that's a good thing? Is there anything you'd like to see change?
I consider that the government made their intentions towards CDM very clear when specifying BSA dutyholders and their responsibilities. I personally think that changes to CDM are a long way off, but I can see legislation developing that merges the two roles in time.

A fundamental issue with CDM for me is a general lack of education. It seems to be a very small item on the syllabus for architects, engineers, construction qualifications – if included at all. An increased awareness of CDM for newly qualified persons will improve attitudes as more people enter the construction industry.

What's the hardest part of your job?
From a principal designer perspective, it's challenging design teams across the industry to think beyond their immediate scope of work and consider health and safety implications. Safe access for cleaning and maintenance aren't always front of mind in the early design stages, but they're key to making sure a building is safe for those who use and look after it long-term.

What advice might you give to your younger self?
Don't be afraid to ask questions. Every day there will be conversations and technical terminology you won't understand; take a note and research it.

Secondly, you will make mistakes, you will feel out of your depth at times – lean into the discomfort and when you've had the chance to reflect on it you can work out what happened and how to improve.

What do you do outside of work?
Juggling three young daughters with living on a smallholding. We have dogs, horses and chickens, and that keeps us busy. I try to keep fit by running and playing squash. ■

CPD: Changes to the CSCS Labourer card

In this CPD, **Garry Mortimer** explains the major changes to the CSCS Labourer card to align with current building safety legislation

> **The Labourer card's new two-year validity period aims to better track the actual number of active labourers in the industry**

On 1 February 2025, the Construction Skills Certification Scheme (CSCS) introduced major changes to the length of the Labourer card. This type of card is now valid for two years on first application.

A five-year card is available on renewal to those who provide evidence of working in a labouring capacity by filling out a Labourer card renewal declaration form available from CSCS's website or by supplying a reference from their employer/main contractor on company headed paper confirming they are working as a labourer.

At the same time, a shortened two-year Trainee card route was opened up to those who had achieved occupation-related non-competence qualifications. When the two-year card expires, the holder can gain a new three-year Trainee card by providing evidence they are registered onto an NVQ, SVQ or an agreed alternative.

This move was also designed to ensure those entering the industry start their career on a recognised training pathway – evidenced by a red card – rather than the Labourer card.

The amendments to the Labourer card are in direct response to the Building Safety Act 2022, which imposes new and more stringent requirements for competency within the construction sector.

Above: The Labourer card is initially valid for two years

Left: Workers on site at Wood Wharf, where CSCS Smart Check is in use

Below: CSCS Smart Check's API can be built into existing site access systems

Addressing challenges

Historically, the CSCS Labourer card has been seen by some as an easy route to gain access to construction sites, despite it being for unskilled workers not on recognised training pathways.

This has led to widespread misuse, with some workers who are not in actual labouring roles obtaining the card to bypass the requirements for more specialised skills certifications.

The total number of Labourer cards in circulation has ballooned to around 500,000. However, data from the Construction Industry Training Board's (CITB) Construction Skills Network Forecast reveals a much lower need for labourers, with just 140,000 required annually in the coming years.

The oversupply of Labourer cards creates several problems. The most pressing of these is that individuals cannot use the card to demonstrate the skills and knowledge elements of competence that a skilled card could.

In addition, the card no longer accurately reflects the number of workers in genuine labouring roles. Furthermore, approximately 85% of labourers fail to renew their cards, and many workers leave the industry long before their cards expire.

This has led to a situation where the card is seen more as a default option for site access, rather than a mark of genuine labouring experience.

The new two-year validity period aims to better track the actual number of active labourers in the industry. After this period, workers who wish to renew their card will need to provide evidence that they are still employed in a labouring role.

This will ensure that only those actively working in genuine labouring occupations can retain the card for a longer period.

The accompanying CITB health, safety and environment test, which is a key component of the Labourer card application, will also see changes in the way it is applied. The validity of the test used for the first Labourer card will be extended from two years to three years.

This extension allows greater flexibility for those who continue in labouring roles and provides a more straightforward renewal process without imposing an undue financial burden on workers.

By making the card's validity period shorter and requiring proof of ongoing labouring employment, CSCS aims to create a more accurate reflection of the workforce engaged in these roles, which will allow the industry to better monitor and track the supply of labourers. ►

“The validity of the accompanying CITB health, safety and environment test used for the first Labourer card will be extended from two years to three years

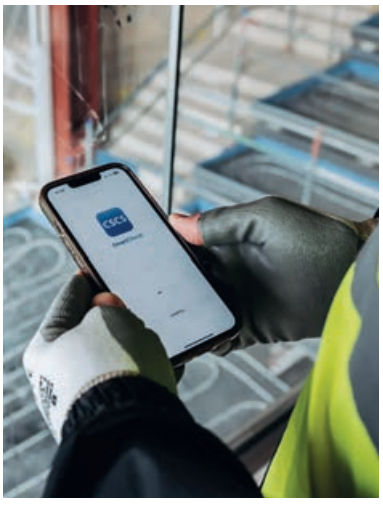
Legislation and recommendations

The Building Safety Act 2022 brought about significant shifts in how competency is defined and managed in the industry. It places a heavy emphasis on competence: everyone involved in construction work – from designers to contractors – must demonstrate that they have the necessary skills, knowledge, experience and behaviours for their roles.

The act requires that all construction professionals demonstrate competence for their specific roles, helping to safeguard against the risk of poor workmanship and dangerous practices.

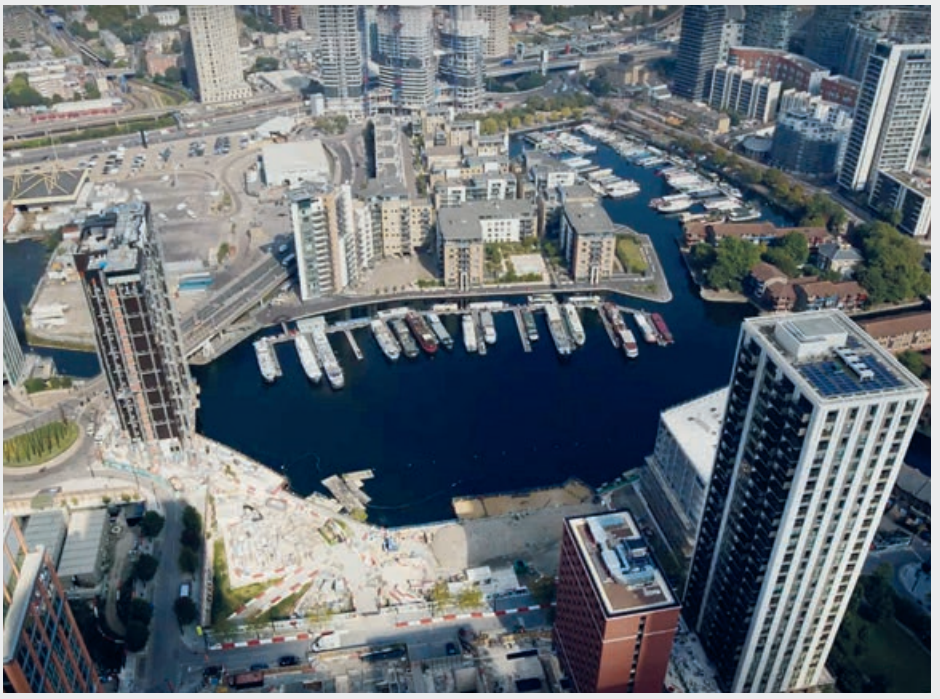
It also establishes the framework for the ‘golden thread’ of information, a comprehensive record of all aspects of building safety, which must be maintained throughout a building’s life cycle.

The revised Labourer card rules support the drive for greater accountability by helping ensure only those in genuine labouring roles carry the card. ►



CSCS Smart Check

CSCS Smart Check offers a quick and efficient way to ensure a CSCS card is legitimate and verify the holder’s qualifications and training. It is available as a mobile app, website and an API for existing systems.



CSCS Smart Check is in use at the Wood Wharf site in London

Case study: Wood Wharf

Having ‘the right card for the right job’ is central to the rigorous health and safety strategy for this east London development

Wood Wharf is a transformative 9ha mixed-use development in the heart of Canary Wharf, east London, where the project’s site management team is reaping the rewards of using CSCS Smart Check to verify workers’ cards and credentials.

Ensuring individuals have the right card for their role is also a prerequisite at this project.

Central to its health and safety strategy is the digital verification of CSCS-logoed cards using CSCS Smart Check.

Cards carrying the CSCS logo from across the CSCS Alliance ensure that over two million workers in construction and the wider built environment are properly trained and qualified for the job they do on site.

Monima Harrison, director of health, safety and wellbeing at Canary Wharf Group, one of the companies behind the scheme’s development, emphasises the importance of having “the right card for the right job”.

Trevor Simpson, health and safety manager and Unite the Union representative, who conducts site inductions at Wood Wharf, says: “We’re very stringent because we want to do the job once and do it right.”

This approach means only workers with the appropriate qualifications and training can carry out works in the project.

Simpson adds that the CSCS Smart Check technology has made a “massive difference” at Wood Wharf.

He says: “To have the right card for the job is crucial because we know that they’re understanding the job role and they’ve been assessed. We won’t accept people coming through, for instance, on a Labourer card to do a trade.

“It’s also about protecting the trades. [Workers are] very protective, they’ve done a lot of work, they’ve gone through apprenticeships and so on to be able to gain their qualifications to do the jobs. If you allow anybody to come in on a Labourer card to do that job, all you’re doing is devaluing that trade.”

While initial resistance existed from some contractors accustomed to less stringent checks, the benefits of digital verification extend beyond compliance. Simpson advises other construction sites to adopt CSCS Smart Check, stating: “Make sure you are checking cards rigorously.”

With the Building Safety Act mandating that all individuals in construction roles must be able to demonstrate their competence through the appropriate skills, knowledge, experience and behaviours, CSCS Smart Check can play a key role in helping ensure compliance.

Watch the case study video at CSCS.uk.com/WoodWharf.

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Because it's our job to offer guidance.
Because firestopping is complex.
Because results are worth sharing.
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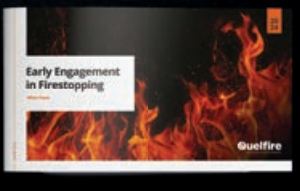

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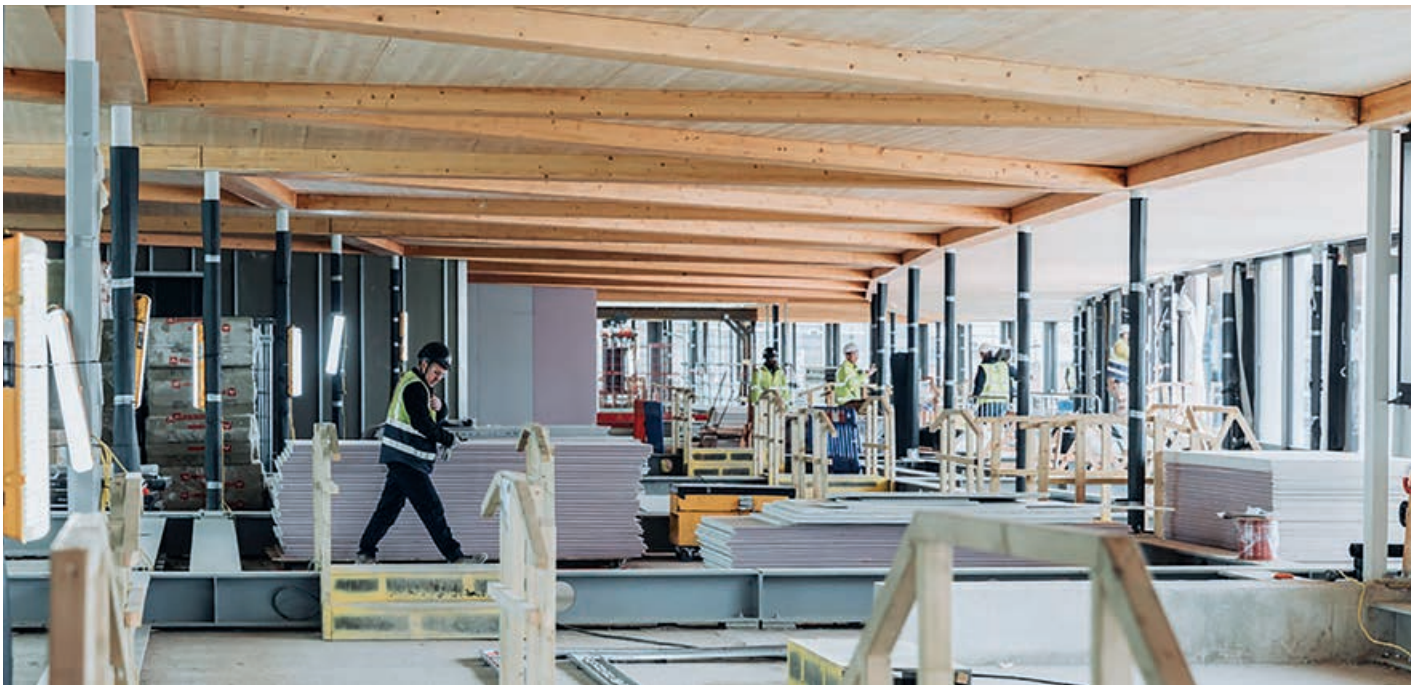

CLC recommendations

All CSCS Alliance card schemes are required to follow the recommendations laid out by the Construction Leadership Council (CLC), last updated in March 2024.

While labouring is currently classed as a non-skilled occupation, the recommendations state that the minimum standard for a skilled occupation must be a relevant qualification or training and testing programme that is aligned to NVQ, SVQ, IfATE Level 2 or SCQF Level 5, and that is independently verified.

The Labourer card is often seen as a quick and easy card to attain for those in non-construction occupations who can face difficulty gaining access to sites that enforce a 100% carded policy.

Those in such occupations do not need CSCS cards. The recommendations also highlight that "cards will not be issued for non-construction related occupations or those visiting sites".

By making these changes, CSCS aims to align the Labourer card more closely with broader industry goals including improving safety on sites and ensuring compliance with regulations such as the Building Safety Act. ■

Garry Mortimer is executive director of operations at CSCS Cards.

Above: Cards with the CSCS logo show that site workers are properly trained for the job they do on site

Below: Wood Wharf's carded policy prevents unauthorised site access

> **"CSCS aims to align the Labourer card more closely with broader industry goals including improving safety on sites**

CPD Questions

1) What legislative framework mandates competency in construction roles?
a) Building Safety Act 2022
b) Construction Skills Certification Scheme
c) Health and Safety at Work etc Act 1974

2) How long is a Labourer card valid for on first application?
a) Two years
b) Three years
c) Five years

3) How can genuine labourers renew their card for five years?
a) Supplying a reference from their employer/ main contractor on company headed paper confirming they are working as a labourer
b) Filling out a Labourer card renewal declaration form
c) Both of the above ways are valid

4) Which test will have its validity extended to three years under the new CSCS guidelines for the renewal of a Labourer card?
a) CSCS labourer test
b) The initial CITB health, safety and environment test for the first two-year card
c) Competency assessment test

5) What is one of the reasons the initial validity of the Labourer card has reduced?
a) To increase card issuance
b) To help meet the competency requirements of the Building Safety Act
c) To simplify renewal processes

To test yourself on the questions and collect CPD points, go to: projectsafetyjournal.com

Useful resources

- **Building Safety Act 2022: www.legislation.gov.uk**
- **Construction Leadership Council industry card schemes recommendations (2024 edition): www.constructionleadershipcouncil.co.uk/wp-content/uploads/2024/03/CLC-Industry-Card-Schemes-26.03.24.pdf**
- **CSCS Smart Check: CSCS.uk.com/SmartCheck**

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Mitigating delays with the Building Safety Regulator

Principal designers and contractors need to follow guidance on how to achieve building regulation approval and the issue of completion certificates, explains **Chris Doran**, partner with Weightmans

The need to expedite the remediation of higher-risk buildings (HRBs) – buildings of at least 18 metres in height and at least seven storeys – is universally accepted and the government has recently launched its Remediation Acceleration Plan with the aim of ensuring that all buildings with defective cladding above 18 metres will be remediated by 2029. But hurdles in achieving that aim still exist.

There has been much comment about significant delays in securing the approval of the Building Safety Regulator (BSR) both for remediation projects and new developments at Gateways 2 and 3. Most of that criticism has been directed at the BSR, and questions have been raised over whether it is adequately resourced.

Nevertheless, clients, principal designers and principal contractors (individually and collectively dutyholders) are contributing towards the difficulties being experienced, and these failings may have significant impact upon their contractual liabilities.

The gateway regime

The gateway regime introduced by the Building Safety Act 2022 (BSA) requires both new and remediation projects to obtain approval at three gateways, namely at planning stage (Gateway 1 – where the BSR must be consulted), prior to construction works commencing on site (Gateway 2) and prior to occupation (Gateway 3).

The HSE originally envisaged that it would take approximately 12 weeks to obtain building regulation approval for new HRBs and eight weeks for existing buildings at Gateway 2 – although it was recognised that more complicated applications might take longer.

In practice, applications for Gateway 2 approval are taking between 25-40 weeks. Gateway 3 approval can take up to four months. There are reports of delays approaching 18 months. These delays are one of the biggest issues that face developers of HRBs, resulting in extended contract programmes and additional costs. Unplanned and unprogrammed delays are also giving rise to disputes over liability for the consequent delays and costs.

Chris Doran
Weightmans

> **Unplanned delays are giving rise to disputes over liability for the consequent delays and costs**

Criticisms levelled against the BSR include failure to engage in constructive pre-application discussions with applicants and refusal to advise on how to comply with building regulations. It has been said that this failure has resulted in confusion as to what is required to achieve building regulation approval. The lack of resourcing by the BSR has been another criticism.

The BSR has acknowledged that it needs to do more to mitigate the delays, that steps are being implemented to refine and streamline the process, and that it is attempting to demystify the process.

The BSR is planning to assist the process by offering a new advisory service on how the functional requirements of building regulations can be achieved. It is currently in the process of recruiting appropriate experts in the field for that purpose.

In the meantime, on 27 March 2025 it issued a series of guidance notes on when permission from the BSR is required or not required, how to manage changes in approvals and how to apply for the completion certificate. These can be found at www.gov.uk.

In addition, the BSR has been talking to the industry in order to provide guidance on what is expected from dutyholders when making an application for either building regulation approval or the issue of a completion or partial completion certificate.

How to mitigate delays

Recognising the number of defective applications being made, the BSR has started the process of trying to demystify the process for obtaining the necessary regulatory approvals for Gateway 2 and 3 approvals.

Application for building regulation approval (Gateway 2)

When an application is received, the BSR 'verifies' or 'validates' the application. This is not a technical analysis. It is merely concerned with ensuring the application is accompanied with the correct supporting documents. The process can take six days (down from 70 in early 2024). The purpose is to ensure defective applications are excluded from the process at an early stage.

Once the application is verified, the BSR will undertake its technical assessment. To do so, it will seek the advice of external multi-disciplinary teams (MDTs). The composition of these vary, but typically include fire engineers, building control and the fire service.

MDTs are asked to advise upon: (i) the quality of the application and whether it should be rejected at an early stage; (ii) what further expertise may be required in order to assess the application; and (iii) whether the project is so complicated that an extension of time (over the normal 8-12 week period) will be sought to assess the application.

The MDT is then charged with assessing the application. The key question it must consider is whether the applicant has demonstrated that the design complies with the relevant building regulations. A common mistake is that applicants simply provide the plans, drawings and specifications which merely show what work is to be carried out. This is likely to result in an application being rejected.

Dutyholders must go much further. It is not sufficient to merely submit documents which, in their view, can demonstrate compliance. It is imperative that they positively demonstrate that compliance will be achieved. The BSR is not prepared to try to second-guess the design philosophy and methodology.

How is this done? Dutyholders must:

- Identify and list each and every requirement of building regulations which they consider needs to be complied with.
- Clarify what standard, code or other document they consider to be pertinent in demonstrating compliance with building regulations and explain the reasons for their view.
- Justify the design by providing a detailed narrative of how compliance with each aspect of building regulations has been achieved. Contentious elements of the design should be specifically addressed.

The BSR recognises that these requirements will require significant investment of time and effort. Failing to do so, however, will result in an application being rejected, with consequent delays and additional cost, including potential contractual liability.

> **Principal designers and contractors now have much clearer guidance on how to achieve building regulation approval**

Application for completion certificate (Gateway 3)

During the construction phase, the BSR will undertake regular site inspections. No meaningful changes to the approved design can be made without the approval of the BSR.

Before a new HRB or additional units in a HRB or any work which causes a building to become a HRB can be occupied, BSR must issue either a completion certificate or partial completion certificate (if only part of an HRB is to be occupied).

It will be critical to maintain an up-to-date construction control plan documenting the following:

- How the activities of contractors and project professionals are managed, including how their respective competence is ascertained and how cooperation, communication and collaboration are monitored.
- How quality of the works undertaken is ensured (the level of supervision, instruction and training offered). The BSR will require evidence that all work undertaken complies with all applicable building regulations.
- How information concerning design and construction (the golden thread) is collected and maintained, when and by whom and details of the information that is retained and evidenced.

Lessons

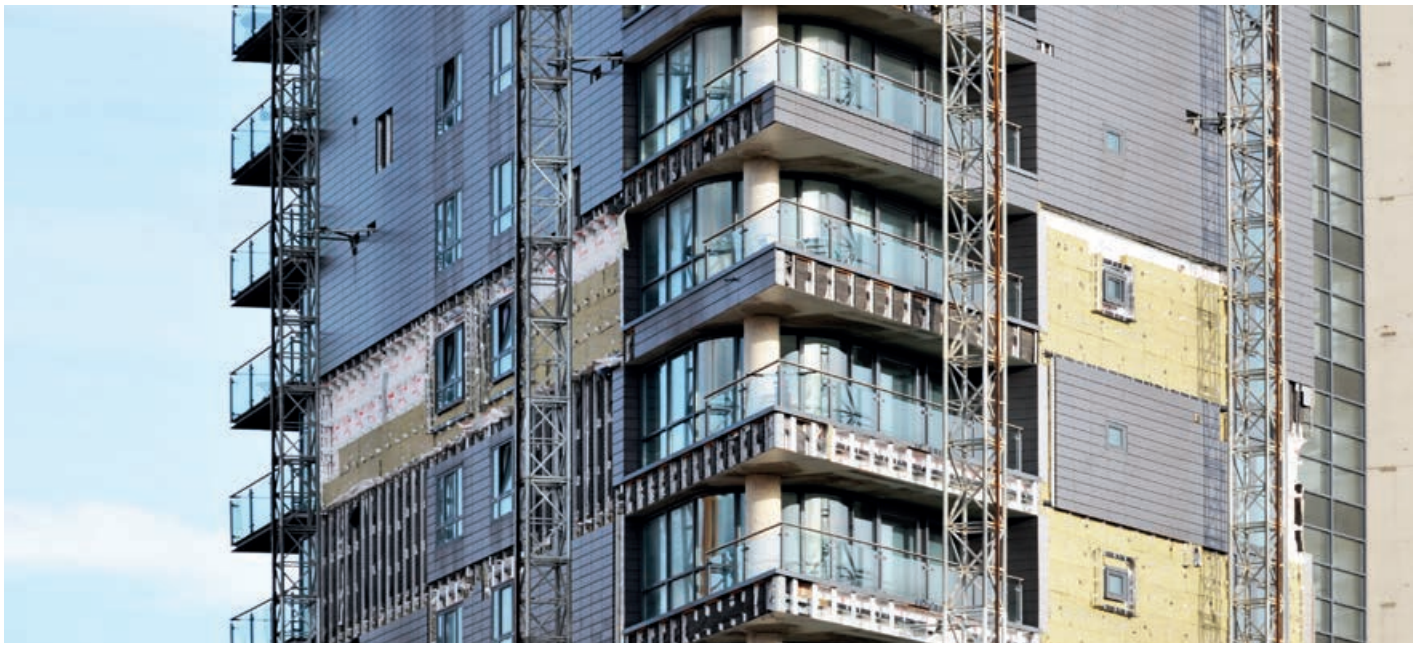
Principal designers and contractors now have much clearer guidance on how to achieve building regulation approval and the issue of completion certificates. Moving forward, they will also have the opportunity to avail themselves of the BSR's new advisory service on how the functional requirements can be achieved.

These initiatives should do much to reduce the level of delays experienced to date. Nevertheless, the current backlog is likely to mean that in the short/medium term, delays will continue to be experienced.

Clients, principal designers and contractors will need to ensure that these potential delays are accounted for in their contractual programme, and/or that extension of time clauses are amended to determine where the risk for various causes of delay is to rest. ■

Government figures show slow progress on remediation

New ministry release shows that there are 123,000 dwellings in buildings that have not yet started to remediate unsafe cladding

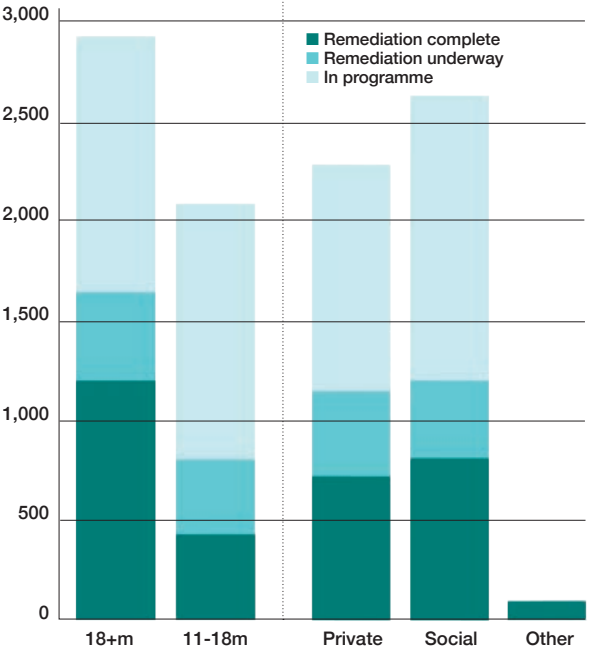


Overall remediation by height

56% of 18 metre+ buildings the department monitors have started or completed remediation on unsafe cladding, compared to 39% of 11-18 metre buildings.

Overall remediation by tenure

46% of sector social buildings the department monitors have started or completed remediation on unsafe cladding, compared to 50% of the private buildings.



There are an estimated 123,000 dwellings in buildings that have not started remediation of unsafe cladding, according to the latest figures released by the Ministry for Housing, Communities and Local Government (MHCLG).

The figures show that the remediation of buildings with unsafe cladding in England is progressing, albeit slowly, and local authorities are increasingly issuing enforcement notices to expedite the process.

Since March 2024, 491 more buildings are known to have started or completed remediation, and 661 more buildings are known to have completed remediation.

As of March 2025, MHCLG is monitoring 5,031 residential buildings over 11 metres in height with unsafe cladding:

- 1,637 buildings (33%) have completed remediation, including those awaiting building control sign-off.
- 822 buildings (16%) have started remediation.
- 2,572 buildings (51%) have not yet commenced remediation.

In December 2024 the government introduced the Remediation Acceleration Plan, aiming for all buildings over 11 metres with unsafe cladding to be remediated or have a scheduled completion date by the end of 2029.

Failure to comply may result in severe penalties for landlords. However a Public Accounts Committee (PAC) report in March 2025 criticised the plan, saying it “lacks ambition”.

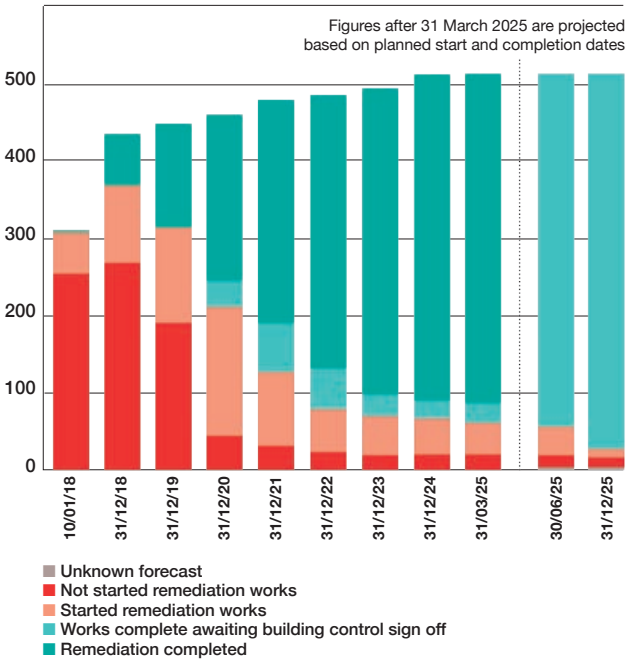
The department says that there are an estimated 269,000 dwellings in the occupied private and social sector in residential buildings over 11 metres with unsafe cladding that the department is monitoring.

Of these an estimated 99,000 dwellings are in buildings that have completed remediation, and an estimated 48,000 additional dwellings are in buildings that have started remediation.

The figures cover remediation progress across MHCLG’s Building Safety Remediation portfolio, covering buildings in the ACM (aluminium composite material) programme, Building Safety Fund, Cladding Safety Scheme, developer remediation contract

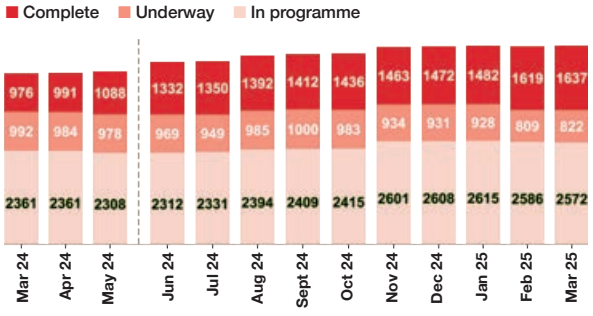
Progress on ACM cladding remediation

96% of buildings are forecast to have started or completed ACM remediation (the type of cladding used at Grenfell) works by the end of June 2025.



Overall progress on remediation

Of the 5,031 buildings identified with unsafe cladding, 2,459 (49%) have started or completed remediation works, of which 1,637 (33% of identified buildings) have completed remediation works. This includes remediation progress on high-rise (18 metre+) and mid-rise (11-18 metre) buildings in height.



and reported by registered providers of social housing.

Local authorities are actively using their powers under the Housing Act 2004 to enforce remediation: the latest figures show that, as of 18 March 2025, enforcement action has been initiated or is ongoing against 537 buildings over 11 metres with unsafe cladding – an increase from 483 buildings in October 2024 and five more than at the end of February 2025.

The MHCLG release says: "Of the 537 buildings, we are aware that at least 194 improvement notices, 54 hazard awareness notices and one prohibition order have been served to date. Some buildings may have received multiple notices." ■

Left above: Cladding being removed from a residential tower in England

In the dock

Recent prosecutions for health and safety breaches

Badly planned excavation leads to £18k fine

A company and its director have been fined £18,000 after a man was injured during excavation work in West Sussex. The accident happened on 23 February 2023 during the installation of a septic tank that JHE Construction was carrying out.

Edward Keely, 30, was struck by falling soil, resulting in multiple bone fractures. He had to be dug out. An investigation by the HSE found no precautions had been taken to prevent the collapse of the excavation.

JHE Construction, of Icarus Avenue, Burgess Hill, West Sussex, pleaded guilty to breaching regulations and was fined £16,000 and ordered to pay £2,612 in costs. Jordan Hay-Ellis, 33, of the same address, pleaded guilty and was fined £2,000 and ordered to pay £1,000 in costs.

Company and manager fined after fatal fall

A company now in liquidation and its operations manager have been fined after a worker fell to his death through a roof at the firm's site in Dudley.

Maciej Rozanski, 42, had been working with another employee to remove a redundant steel cleaning machine from the company's Sovereign Works site on Deepdale Lane on 29 June 2018 when he stepped onto a fragile roof and fell more than 6 metres to the floor below.

An HSE investigation found there was no suitable and sufficient risk assessment made for the work at height activities.

> **Safety inspectors found health and safety failures 'so serious' that a construction site in east London had to be closed on two separate occasions**

Surface Technik (Old Hill), formerly of Deepdale Lane, Dudley, which is now in liquidation, was found guilty by a jury of a breach of regulations and was fined £90,000 and ordered to pay costs of £28,956, on 21 March 2025.

Robert Hammond of Sutton Coldfield, who disputed he was responsible for health and safety at the site, accepted that he did not take reasonable care for the health and safety of his employees and was fined £8,500 and ordered to pay the same amount in costs.

Developer failed to meet 'most basic' standards

A London property developer has been fined £63,000 after safety inspectors found health and safety failures "so serious" that a construction site in east London had to be closed on two separate occasions.

The HSE investigated Nofax Enterprises and identified serious failures, including multiple working at height risks, poor fire precautions and exposure to large amounts of silica dust.

Other breaches of the law included failing to protect workers from exposure to wood dust, as well as insufficient Covid and welfare controls.

Nofax Enterprises, of Maldon, Essex, pleaded guilty to breaches of regulations and was fined £63,000 and ordered to pay costs of £25,622 in March this year.

Unpaid work sentence after asbestos removal

A builder was given a community payback sentence after carrying out unlicensed asbestos removal work at a house in Cheadle, Manchester, in September 2022.

Gavin Mutch, trading as G Mutch Developments, had been contracted to deliver renovations at the property, including roofing work.

Mutch, of Cheadle Hulme, pleaded guilty to breaching regulations and was sentenced to a 12-month community order with 180 hours unpaid work and ordered to pay £2,000 in costs.

Regional focus: Edinburgh

Global safety and health construction coordinators came together at the APS/ISHCCO congress

A lone piper leads out delegates at the Edinburgh conference

Greater collaboration between UK health and safety professionals and their European counterparts has been pledged at a landmark international congress in Edinburgh.

The Association for Project Safety (APS) and the International Safety and Health Construction Coordinators Organization (ISHCCO) hosted the meeting in March to bring together construction safety experts from across Europe.

The gathering focused on raising competency standards, tackling emerging risks and strengthening global collaboration in construction health and safety coordination.

The key themes discussed included issues around competence and compliance in a post-Grenfell landscape.

With building safety regulations tightening, discussions focused on how safety and health construction coordinators (SHCCs) – including UK principal designers (PDs) and principal contractors (PCs) – must adapt to ensure improved safety standards.

There were also discussions around new and emerging risks – beyond known hazards such as asbestos and silica – and the event highlighted new occupational risks and the impact of climate change on construction safety.

Speakers, who included APS president Mark Snelling and Steven Naylor from HSE's Science Division data science team, reinforced the role of technology, particularly how digital innovation – BIM and emerging technologies – can enhance processes and improve risk management.

Other themes included: introducing greater collaboration between ISHCCO and the International Social Security Association – Construction Section (ISSA-C) to tackle global challenges; building a resilient future by climate-proofing design infrastructure – the European Council of Civil Engineers (ECCE) manifesto; and measuring performance in a bid to improving safety outcomes to benefit long-term industry improvements.

As a founder member of ISHCCO, APS has a long-standing commitment to improving health and safety coordination in the UK and Europe. The joint congress underlined the importance of sharing best practices and fostering international collaboration to advance construction safety.

APS chief executive Andrew Leslie commented: "APS was formed by consequence of EU directive 92/57 which impacted on all EU member states. Despite the UK decision to leave the EU, APS recognises the importance of sharing good practice and research and development with our ISHCCO colleagues, particularly as many design and construction goods and services are now delivered on an international basis."

> **"APS recognises the importance of sharing good practice and research and development with our ISHCCO colleagues**
> **Andrew Leslie, APS**

Philip Baker
APS past president and ISHCCO co-founder

ISHCCO president Evangelitsa Tsoulofta added: "ISHCCO's vision, as the umbrella organisation of safety and health construction coordinators in Europe and worldwide, is to affirm its members' professional identity and collaborate with OSH [occupational safety and health] and construction professionals and institutions for a safer, healthier and sustainable construction industry and infrastructure.

"Promoting construction OSH, we not only protect the lives and wellbeing of construction workers but also contribute to the sustainability of our industry, infrastructure and society."

Tsoulofta continued: "I extend an invitation to all OSH and construction professionals to join ISHCCO in this noble mission, and I look forward to working together to build a better future for all.

"Building on the success of Edinburgh 2025, our Spanish colleagues will host the next ISHCCO General Assembly and Congress in Madrid in 2026, further strengthening ties between European safety coordinators." ■

Key takeaways

APS past president Philip Baker, who is an ISHCCO co-founder and also chairs a working group, spoke at the conference. Here are his five key takeaways

- **As well as the known risks like asbestos and silica, there are new and emerging risks, and climate introduces a new challenge.**
- **Safety and health construction coordinators (UK PD and PC) have vital roles to play in delivering improved standards for construction health and safety.**
- **Measuring performance is important and it is important to get it right.**
- **Technology, both physical and digital, should be embraced to help the processes.**
- **Organisations need to work collaboratively to deliver change.**

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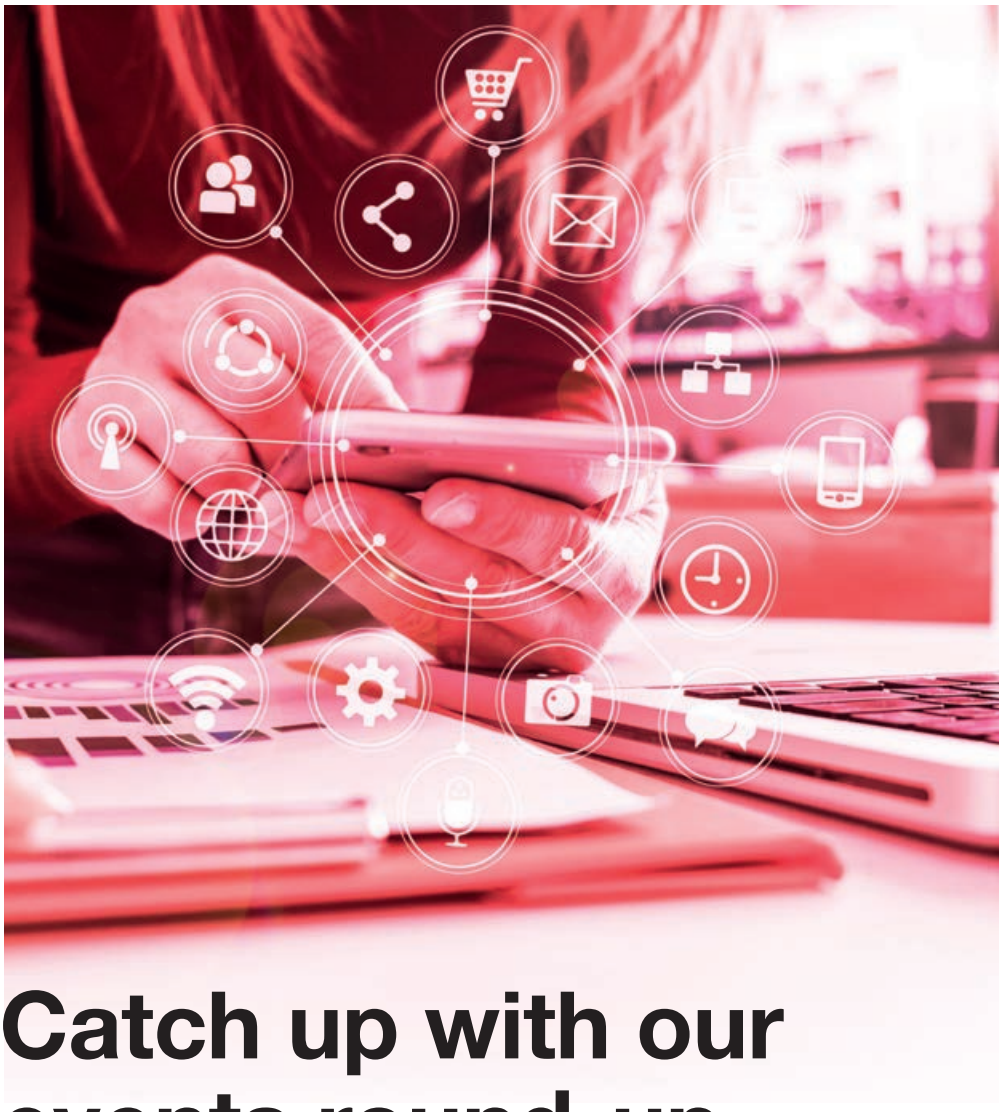

Catch up with our events round-up

Make the most of your APS membership by learning from our programme of events, webinars and updates through the year

It's been a busy spring at APS, with a packed programme of CPD events, webinars and updates helping members stay informed and ahead of the curve. Whether you joined us live or need to catch up, we've made it easier than ever to access quality content at your convenience.

Our spring CPD session, Unlock the Hidden Backbone of Construction: Temporary Works, was a big success, delivering valuable insights into an often-overlooked but vital area of construction.

Both live sessions were well attended, and we're delighted to offer these – and other recent webinars – on demand, giving members the flexibility to watch in their own time.

The Spring Webinar Series continues to be a popular and practical way for members to build knowledge in key areas. Available to watch now, sessions include topics such as Language Barriers on Worksites, Asbestos, Temporary Works, Unexploded Ordnance and Installing Electric Vehicle Chargers.

If you weren't able to attend live, don't worry, you can still benefit from the learning at a time that suits you.

Looking ahead, our Building Regulations Series is now in full swing and runs until the end of the year. This series, led by industry experts Andrew Leslie and Mark Snelling, covers essential updates and the implications of ongoing regulatory changes.

"Each session of our Building Regulations Series is designed to be concise, informative and easy to access, whether you join live or catch up later

Each session is designed to be concise, informative and easy to access, whether you join live or catch up later.

Upcoming topics include:

- 30 May: Fire Safety in Construction: What Designers & PDs Need to Know.
- 2 July: HRB Gateways Explained.
- 10 September: Managing Competence – The New BSR Guidance.
- 7 October: Building Safety Act in Occupation.
- 20 November: BSA & Building Safety Regulations: What's Next?

If you missed the opening session in April, BSA in Action: 6 Months On – What's Working and What's Not, it's also available to watch on demand.

And don't forget to mark your calendars, our APS National Conference will take place on Wednesday 17 September 2025. More details will be shared soon, but it promises to be a standout event bringing together industry voices, innovation and forward-thinking discussion.

Looking ahead to autumn

Planning is already under way for our autumn programme – and there's plenty to look forward to.

Members can expect another engaging CPD series, a fresh line-up of live webinars and an exciting themed week focused on Artificial Intelligence — a rapidly evolving area set to impact all corners of our industry. More details will be released soon, so keep an eye on the website.

To explore all our upcoming events and access on-demand content, visit www.aps.org.uk/events. The majority of our CPD sessions and webinars are available to rewatch, meaning you never have to miss out, no matter how busy your schedule.

Stay connected, stay informed and make the most of your APS membership by taking advantage of the rich programme of content designed to support you throughout the year. ■

Find out more about what's on at www.aps.org.uk/events.

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