

## Taking the heat off

How heat stress awareness can help mitigate risks to construction workers



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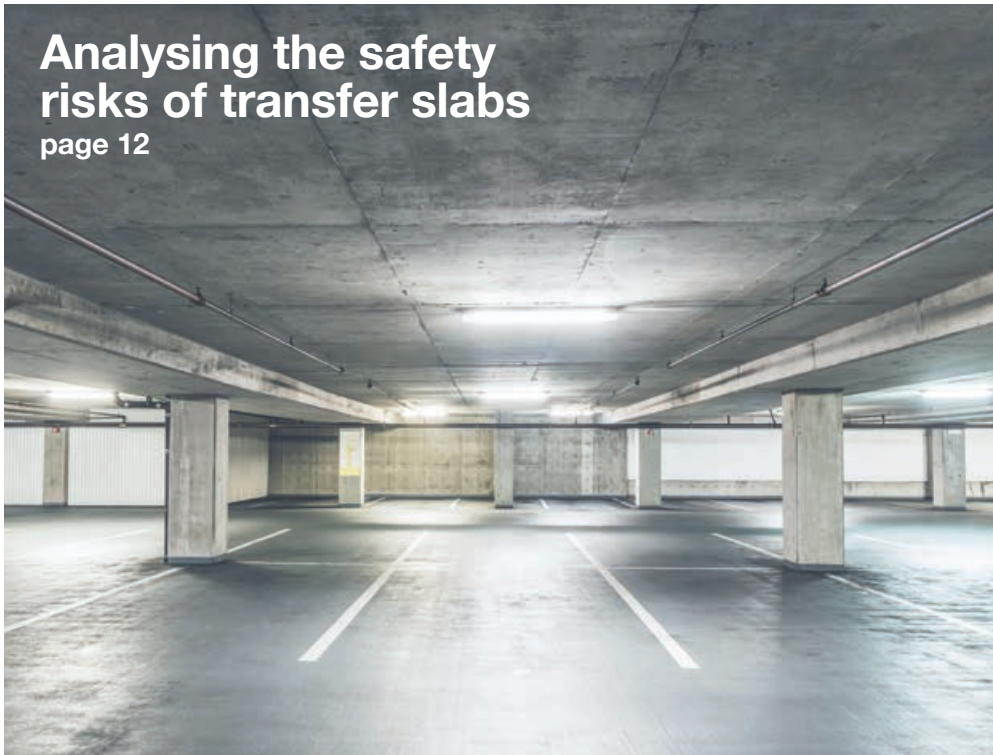
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# Analysing the safety risks of transfer slabs

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**Association for Project Safety**  
5 New Mart Place, Edinburgh EH14 1RW  
Telephone: +44 (0)131 442 6600  
www.aps.org.uk | info@aps.org.uk

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Atom Media Partners, 26 Bedford Square, London WC1B 3HP  
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**Project Safety Journal**  
**Editor:** Will Mann  
will.mann@atompublishing.co.uk  
**Production editor:** Mary Ann Haslam  
**Art editor:** Heather Rugeley  
**Commercial manager:** Susan Cook  
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# Heat stress

page 08

“  
The shade, water and rest approach may sound simple, but at its core is robust communication, forward planning and a knowledge of the legislation underpinning working in heat



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# Welcome

Thoughtful change is key to building safety improvement, says **Andrew Leslie**

**R**eform is on everybody's radar and not just on the political scene, but let's leave the latter to the politicians.

Since the Grenfell tragedy, there has been a mood to reform the way that the built environment is designed, built and occupied towards enshrining skills, knowledge, experience and behaviours into measurable individual competence and organisational management of competence.

Revolution was not considered, although aligning to the Scottish building warrant scheme would have revolutionised building control in England and Wales. The "superior" Scottish arrangements were alluded to in the report *Building a Safer Future (Interim Report)*. These references were not repeated in *Building a Safer Future: Final Report*. C'est la vie!

Let me reflect on what reform is. Reform is the process of making deliberate changes to improve something that already exists rather than replacing it entirely. At its core, reform acknowledges that systems, institutions or practices are imperfect, but fundamentally worth preserving.

Reform assumes continuity matters; that stability, order and accumulated experience have value. This suggests an incremental approach, which can make reform slower and more complex, which I think is what we have been witnessing. This approach often results in changes that are more durable and widely accepted. Let's hope so.

All the above applies to where we are; the industry has embraced continuity with added regulatory controls that overlay the established processes and new dutyholders in the mix. Reform also operates on an individual level as distinct from a societal level.

Conscientious professionals accept they must change habits, attitudes or behaviours they recognise as flawed. It is their responsibility to change and challenge flawed behaviours. This personal dimension highlights an important aspect of reform: it begins with recognition.

Whether as a society, an organisation or an individual, reform requires honesty about shortcomings

and the drive to improve. It also involves discipline and patience, as meaningful change rarely happens instantly). But for complete reform of an industry to take place, some pre-conditions are still missing – for example, mandating the competence of safety critical dutyholders to see off, once and for all, those who choose the lowest (and presumably most economically beneficial) path.

Reform is not without challenges. Resistance often comes from those who benefit from existing arrangements. There is also debate over how much reform is enough. Too little may be superficial, leaving deeper problems unresolved, while too much can undermine stability and provoke backlash. As a result, reform can be contested, shaped by competing visions of what "improvement" truly means.

## Reforming CDM

Since 2017, there has been a lot of work done to set out the vision for the future, not least through the influence of APS Honorary Fellow, Dame Judith Hackitt. There is currently a plethora of committees and other groupings wrestling with proposed reforms, and quite possibly a danger of parallel groups creating slightly different propositions.

That is why the APS initiative in gathering most of the key sector players into an Industry Task and Finish group to support the Industry Competence Committee guidance on an organisational competence framework is such an important development, resulting in a single pan-industry collaborative approach supported by broad consensus. The resulting guidance should encourage meaningful dialogue, compromise and collective responsibility.

The four jurisdictions in the UK are taking slightly different approaches to reforming their approach to regulation – building regulations and regulation of the professions. This is a shame because a UK-wide approach would have been preferable all round, although alignment across the nations is being promised.

Building Regulation reform in England and Wales was modelled on



**Andrew Leslie**  
Association  
for Project Safety

“**Reform requires honesty about shortcomings and the drive to improve**”

CDM 2015 to a large extent, yet unlike CDM it does not apply throughout the UK. CDM has not been plain sailing, with three iterations to date, but the second review of CDM 2015 – the post implementation review (PIR) – has just been issued by HSE and the conclusion is that this iteration remains fit for purpose. The PIR announcement can be found on page six of this edition and APS will be examining and reporting back on its impact in the next edition of *Project Safety Journal*.

So, CDM 2015 will not be reformed, but some issues were identified in the PIR that may require adding to or revising L153 or providing further specific guidance. Where reform will touch CDM 2015 follows from the work being done on competence responding to the Grenfell Stage 2 Inquiry Report, and of course BS 8670-1 that outlines core competence criteria for building safety. The PIR specifically mentions early input in projects from a competent PD and the competency requirements for the PD role.

This does point to a clarification of appointment of the PD "before construction begins", which is an obvious gaming opportunity for the unscrupulous, and a structured approach to PD competence. APS members are, of course currently assessed at IMaPS and CMaPS for their capability to undertake broad CDM 2015 duties. The assessment is not role specific.

And so CDM 2015 dutyholders will be touched on in the wider reforms that the post Grenfell era is facing.

## Showing evidence

A final word on competence: "I hear and I forget. I see and I remember. I do and I understand."

This saying is sometimes attributed to Confucius (wrongly it seems), but it emphasises that the foundation stone of competence is showing evidence of doing – only saying.

Let APS and our members and registrants embrace reform and continue our path of delivering a safe and healthy built environment for all.

**Andrew Leslie is the CEO of the Association for Project Safety.**

# APS appoints new board members

The Association for Project Safety has announced the appointments of Stefan Mordue and Stewart McArthur to its board

**S**tefan Mordue is a chartered architect and senior manager for education and partnerships at infrastructure engineering software business Bentley Systems and has been a leading advocate for adoption of digital construction processes over the past decade.

His career spans professional practice, consultancy, education and governance, with a consistent focus on improving safety outcomes through better design, collaboration, and information management. He is co-author of BIM for Construction Health and Safety (RIBA Publishing), a publication commended by the Health and Safety Executive and CPD-approved



From top:  
Stefan Mordue;  
Stewart McArthur

by APS. He has also contributed to CIOB guidance on AI and digital twinning.

Also joining the APS Board is Stewart McArthur, an independent construction assessor at Bureau Veritas, the inspection and certification business.

He has more than 30 years' experience in the construction industry and began his career in building standards before moving into the warranty sector, before stepping out into construction as a site manager, where he gained experience in site management and health and safety.

He has been involved with the Chartered Association of Building Engineers (CABE) since 2001 and

has played an active part in the Scottish regional committee for the past 14 years.

McArthur is based in Scotland and, in line with APS strategy for having board representation in the four UK jurisdictions, he will keep the board apprised of developments on Scottish regulations and be the focal point for membership interests in Scotland.

Andrew Leslie, chief executive of APS, said: "The new appointments bring a diverse mix of experience and ideas to our board, which will help us better support our members.

"Stefan and Stewart are both highly respected professionals who bring a wealth of knowledge and passion to our board."

## Concerns raised over potential sprinkler reversal

Department of Education guidance on sprinkler use in schools branded 'inconceivable'

The Construction Industry Council (CIC) has raised concerns that government guidance could signal a reversal of policy supporting sprinkler systems in new school. The CIC says it has been made aware of the document, issued by the Department of Education, which appears to be a new specification for all new schools being built under the 2025 DfE contract.

The document CIC references is a specification document that states "...the use of BB100 (2007 version) is no longer required" for any schools being built under the 2025 DfE contract. BB100 (2007) requires schools to be designed and built to include sprinklers, unless the risk is low and its use not proportionate.

With the open consultation on Approved Document B running until 1 July, the CIC is urging the government to "consider the wider impact of fire issues in people's mental health and wellbeing".

Commenting on the news, APS' CEO Andrew Leslie said: "APS fully supports the CIC's concern. It seems inconceivable, in the post-Grenfell regulatory landscape, that a government department would reduce fire safety measures in a building where large numbers of people are assembled and where previous guidance required these fire safety measures to be installed."

## HSE review: CDM 2015 'remains fit for purpose'

Regulator concludes the legislation has been positive for the construction industry and dutyholder roles have helped health and safety coordination



**T**he HSE has published its second post-implementation review (PIR) of the Construction (Design and Management) Regulations 2015 (CDM 2015).

It concludes that "the overall objectives are still being met and that CDM 2015 remains fit for purpose".

The regulator says that, generally, the legislation has been positive for the construction industry and, specifically, the dutyholder roles have helped health and safety coordination.

The review acknowledges that "simplified guidance has had a moderately positive impact in terms of compliance; however, gaps

remain". But the HSE says they do not justify changes to the regulations. The HSE will now consider several of the issues raised, including:

- Clarifying the complexity of the pre-construction phase of the project and re-emphasising the need for early input from a competent PD;
- Providing further clarity for all CDM 2015 dutyholders on the obligations of the client and the competency requirements of the PD role;
- Encouraging the use of common digital systems for collating consistent project information and data so that it is accessible to all dutyholders;
- Ensuring that SMEs are provided with proportionate and targeted CDM 2015 guidance, directly relevant to the issues they are likely to face on a day-to-day basis, in an easy-to-understand and concise manner.

Regulation 39 of CDM 2015 requires a review to be carried out by the HSE every five years since the regulations came into force.

## In the dock

Recent prosecutions for health and safety breaches

### Construction firm fined for multiple site welfare failings

A construction company has been fined for failing to provide adequate welfare provision at four of its sites across the West Midlands.

An investigation by the HSE found that Ling Developments Ltd had breached a section of the Construction (Design and Management) Regulations 2015, requiring principal contractors to provide specific welfare facilities for construction sites.

Failures included no hot or warm water in the toilets and a lack of suitable rest facilities for workers. The inspection resulted in two improvement notices being served, requiring the company to take action to comply with the law.

On three previous occasions, the company had been found to have breached the same legislation.

In its investigation, HSE identified repeated failings by the company, which, despite enforcement action and advice, continued to provide substandard facilities that contravened its legal duties.

The company was fined £15,858 and ordered to pay £3,853 in costs at a hearing at Birmingham Magistrates Court on 13 April.

HSE Inspector Natalie Spurrier said: “The provision of suitable welfare facilities such as hot running water and basic rest facilities is the minimum all workers should expect – they aren’t a luxury.”

### Builders’ merchant fined £2.2m following fatal conveyor crush

A national builders’ merchant has been fined £2.2m after a worker was fatally crushed by a timber pallet.



HSE

Stickers were present on the conveyor before the incident took place

Paul Coulson was removing plastic packaging from pallets of timber inside a conveyor on 22 May 2024 at a site in Bury St Edmunds, Suffolk.

An operative, who could not see Coulson from his position (and unaware he was inside), started the machinery.

The 56-year-old was struck initially by a pack of timber weighing approximately three tonnes, and a second time when the operative attempted to move the load again. Coulson died at the scene from crush injuries.

In its investigation, the HSE identified from CCTV that between 14 April and 23 May 2024, operatives entered the framework of the conveyor 19 times.

The HSE found that the company had placed signs on the machinery to prevent the working practice, but no further action was taken to stop access.

The builders’ merchant, which operates more than 330 sites across the UK, including 230 core merchant branches, pleaded guilty to breaching the Health and Safety at Work etc Act 1974 Section 2(1) and fined £2.2m.

According to Joanne Williams, the HSE inspector who oversaw the investigation, the fine was in line with the severity of the incident. “This was a staggering failure that has cost a man his life and robbed a family of their loved one, and the scale of the fine handed down reflects the gravity of this case,” she said.

### Teen labourer’s fatal fall from height ‘wholly avoidable’

An accident in which a 19-year-old died after falling six floors through a ventilation shaft should have been prevented, an investigation by the Health and Safety Executive (HSE) has concluded.

Renols Lleshi, 19, was working for Jerram Falkus Construction, removing scaffolding from the roof garden of a block of flats being built in Ealing, London, in July 2023.

The investigation found that a ventilation shaft had been inadequately covered with a sheet of plasterboard and roofing foam. The teenager stepped onto the shaft, unaware that the covering was insufficient, and fell six floors to his death.

It was also revealed that the company failed to conduct routine inspections of the roof garden area, which meant the insufficient covering went undetected, with workers given no warning of the hazard.

Natalie Prince, the HSE inspector who oversaw the investigation, said that while falls from height continue to be the biggest causes of workplace fatalities, “this was a wholly avoidable incident that led to the death of a young man”.

Jerram Falkus Construction Ltd pleaded guilty to breaching Regulation 4(1) of the Work at Height Regulations 2005. It was fined £42,200 at City of London Magistrates’ Court on 19 March.

There was no supply of clean hot and cold or warm water on site



HSE



# Keep it cool: heat stress

As temperatures rise on construction sites, planning, communication and a strong safety culture are key to mitigating heat stress.

**Mark Glover** finds out more

For construction workers working in Faversham on 1 July last year, shade, water and plenty of breaks were essential as the Kent town recorded the UK's hottest temperature, nudging the mercury to a sweltering 35.8°C.

Last year would go on to become the country's warmest recorded summer, according to the UK Met office, with a mean temperature of 16.10°C logged from 1 June to 31 August, beating the previous record of 15.76°C set in 2018.

As extreme heat becomes a more regular occurrence, health and safety managers in construction are having to build heat stress awareness into their strategies. The shade, water and rest approach may sound simple, but at its core is robust communication, forward planning and a knowledge of the legislation underpinning working in heat.

In the UK, while there is no legal maximum working temperature, employers have duties under the Health and Safety at Work etc. Act 1974 to ensure risks around high temperatures are managed. The Management of Health and Safety at Work Regulations 1999 says employers need to assess risks, including heat stress, and implement appropriate control measures.

The Health and Safety Executive, in its guidance on temperature in the workplace, suggests a "thermal comfort" range between 13°C and 30°C, dependent on the type of work undertaken.

On a global scale, the International Labour Organisation says 2.4 billion workers are being exposed to excessive heat, resulting in more than 22 million non-fatal injuries annually.

From a global compliance perspective and in the absence of strict legal limits, ISO Standards aligned with global heat analytical systems are useful markers.

ISO 7243 assesses risk using the Wet Bulb Globe Temperature – an index that measures heat stress through air temperature, humidity, radiant heat and wind speed, while ISO 7933 interprets heat stress through a Predicted Heat Strain (PHS) model, which assesses how a worker's body will respond to heat stress over time.

EU Directives, including the Framework Directive 89/391/EEC, requires employers to ensure worker safety under all foreseeable risks, including thermal risks. This is interpreted and enforced by each member state. For example, while Spain has no fixed temperature limit in place, a Royal Decree ratified in

**22** Some 2.4 billion workers are being exposed to excessive heat, resulting in more than 22 million non-fatal injuries annually

May 2023 means work must be adapted or suspended if an official orange or red alert is announced or "if preventative measures do not sufficiently reduce risk".

Regulation 13 (4) (c) of the Construction (Design and Management) Regulations 2015 states that the principal contractor must ensure that facilities complying with the requirements of Schedule 2 are provided throughout the construction phase.

Schedule 2 outlines the minimum welfare facilities required on a construction site, which includes "an adequate supply of wholesome drinking water" and "a supply of clean, hot and cold, or warm, water", the latter as part of the site's washing facilities.

In April this year, the HSE fined a West Midlands construction firm for failing to offer such welfare provisions to workers across four of its sites. The HSE inspector who carried out the investigation, Natalie Spurrier, said: "The provision of suitable welfare facilities such as hot running water and basic rest facilities are the minimum all workers should expect – they aren't a luxury."

**Solutions for heat stress**

Heat stress takes place when the body's way of controlling its internal temperature starts to fail. The process is affected by factors including temperature, work rate and humidity and work clothing including PPE.

It can affect people in different ways, and some are more likely to suffer than others. Symptoms ▶

**Symptoms of heat stress**

- Impaired concentration
- Muscle cramps
- Heat rash
- Severe thirst
- Heat exhaustion: fatigue, dizziness, nausea, headache, moist skin
- Heat stroke: hot dry skin, confusion, convulsions and eventual loss of consciousness

Source: HSE

**“As extreme heat becomes a more regular occurrence, health and safety managers in construction are having to build heat stress awareness into their strategies**

**“One of the admin controls would be making sure that our employees are properly hydrated and, part of making them properly hydrated, is encouraging them to do so**  
Doha Mater, PepsiCo

include heat exhaustion ie fatigue, dizziness, nausea, headache and heat stroke ie hot dry skin, confusion convulsions and eventual loss of consciousness. It can result in death if not detected at an early stage. More tangible warning signs include muscle cramps, heat rash and severe thirst.

Doha Mater is EHS director at PepsiCo and oversees workforces in Africa, South Asia and the Middle East where temperatures regularly hit above 40°C in the summer months. As such, outdoor work is prohibited between the hours of 12pm and 4pm, when the sun is at its most intense.

Speaking on a NEBOSH webinar on heat stress, she shared insight into how, alongside legislative alignment, the nature of the risk means administrative controls (the way people work) should be applied as opposed to an engineering control strategy

(removing the hazard). “One of the admin controls would be making sure that our employees are properly hydrated and, part of making them properly hydrated, is encouraging them to do so or providing the right facilities for them,” she said.

#### **Build in breaks**

Offering a shaded area and a supply of water is, at its simplest, a hydration station. However, these facilities can vary in design based on the work environment. A basic asset could be a series of three or four large igloo-style water coolers with reusable cups, located near break areas, and awareness posters around hydration habits.

Mobile hydration carts or trailers may be ideal for large outdoor worksites, such as oilfields or solar farms. They can include a range of





**80** Already this year, the 26.5°C recorded on 7 April was the second warmest in the first half of April in 80 years

water dispensers, and ice chests as well as cooling fans, misting systems and shade awnings.

Signage around hot work areas is particularly useful and the asset may be located near restrooms or break areas. Ideally, it should be configured to the workforce it serves considering the number of employers, the types of tasks being undertaken and the environment, which in construction, could potentially be a dusty one.

Ideally, the hydration station or water point acts as a reminder that workers should build hydration breaks into their schedules rather than ignoring it, which helps to implement good hydration practice into a workforce.

Visuals, automated reminders and announcements are an important part of an overall management strategy, but having a human touchpoint enables supervisors to carry out important physical checks.

As well as physical symptoms, heat stress can also affect cognitive behaviours, a key issue for those operating in high-risk environments such as construction sites. Mater cited awareness of early warning signs such as dizziness, sweating and confusion, which can be subtle.

“We do have sight of what could be going wrong and it actually looks very natural. People start getting lightheaded, they might feel nauseous, have a headache... in the workplace, we need to make sure that we voluntarily go and look for those early signs,” she said.

This awareness comes from a healthy safety culture, implemented from the top down and actioned robustly throughout management lines, including supervisors. Reminding workers to bring water on board may be a basic administrative measure, but it can help strengthen the relationship between workforce and management by demonstrating genuine care for employees’ wellbeing.

**PPE**

One of the factors that can accelerate heat stress among workers is PPE. It’s a conundrum suppliers face when designing workwear that must

conform to standards while providing a level of comfort. Some PPE include moisture-wicking fabrics, but it often comes down to working closely with suppliers to source clothing that provides the necessary protection while also offering cooling properties. However, most materials found in PPE can contribute to heat stress if worn in extreme conditions.

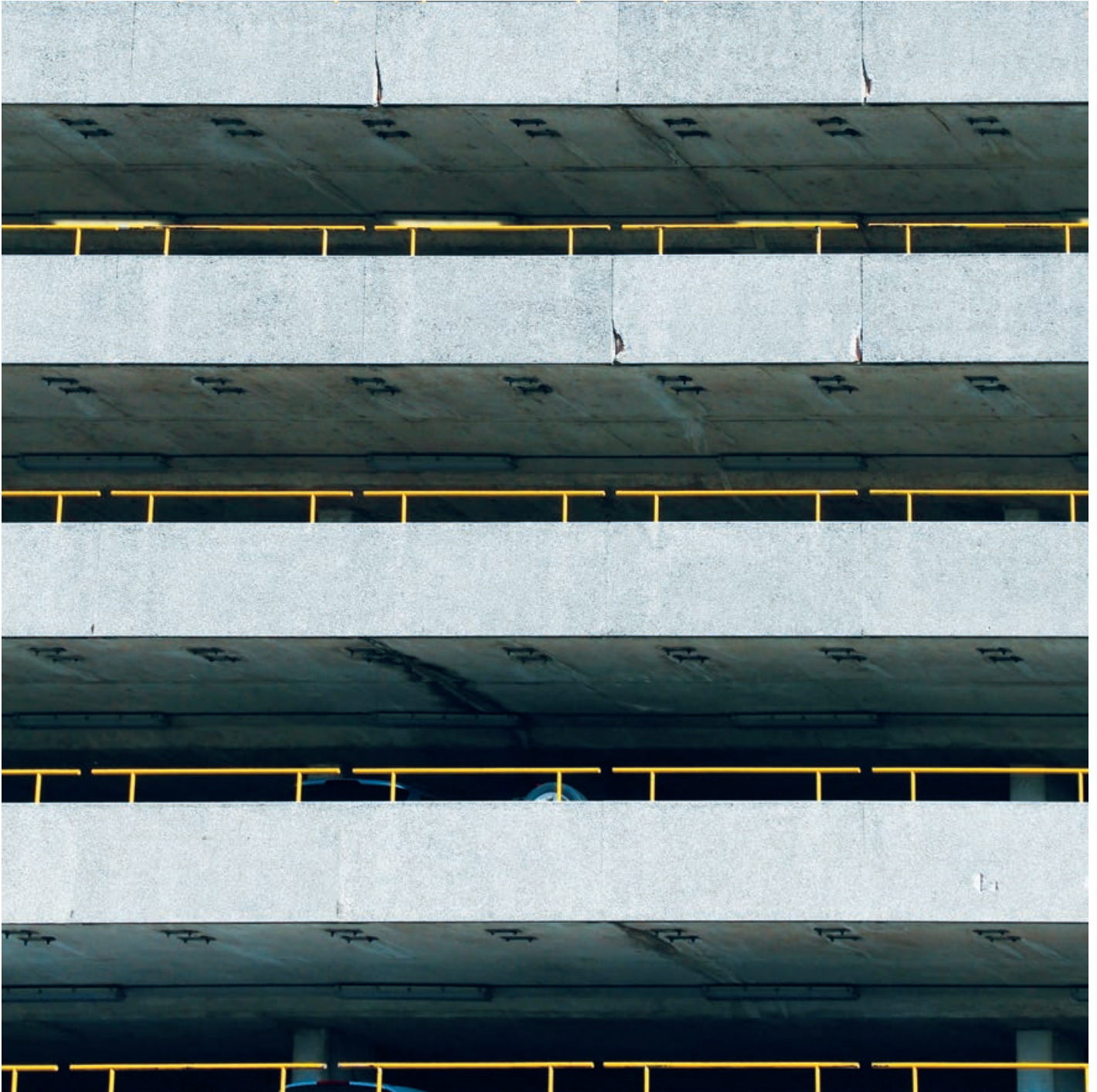
It’s a dichotomy meaning mitigation takes on more of a challenge. An increased awareness of workers’ schedules, length of shifts and hydration becomes paramount, but it comes down to good habits and a culture that empowers and encourages while ultimately emphasising the importance of taking breaks and staying hydrated. The knock-on effect can be extremely positive for a workforce, creating better morale, better health and perhaps productivity on site.

**Plan ahead**

Already this year, the 26.5°C recorded on 7 April was the second warmest in the first half of April in 80 years, and few would be surprised if this summer continued the trend of record-breaking temperatures. ■

“As well as physical symptoms, heat stress can also affect cognitive behaviours, a key issue for those operating in high-risk environments such as construction sites”





# Transfer slabs and safety risks

Concerns around transfer slabs have been raised by the Building Safety Regulator. **Trevor Rushton** at Watts Group analyses the latest position

Towards the end of last year, the Building Safety Regulator (BSR) issued a letter highlighting risks identified in reinforced concrete multi-storey buildings that incorporate transfer slabs. The concerns centre on the lack of a consistent design methodology and the potential for collapse due to punching shear.

The risks were first raised in November 2024 with the publication of IStructE Guidance on transfer slabs, followed by commentary in the CROSS-UK Newsletter in December last year. RICS subsequently issued a Practice Alert. There have already been at least two instances of emergency building evacuations, and building owners have been advised to determine whether transfer slabs are present and to seek professional advice where there are visible signs of distress or concerns regarding condition or designs.

**What is a transfer slab?**

A transfer slab is a thick reinforced concrete slab designed to support columns that do not continue directly down to the foundations. Instead, the slab transfers loads horizontally to other supporting columns.

They are typical in residential developments, student accommodation, hotels and mixed-use buildings of five storeys. Common uses include where the column spacing on the ground floor of a building (possibly commercial space) is greater than the spacing on the first floor and above, or where successive floor plates step back from one another to form terraces.

Typically, transfer slabs are flat without downstand beams, making their formwork simpler and more economical. However, they are thicker than standard slabs – as a rule of thumb, 75mm thickness per storey height – and this can have repercussions in terms of temporary support, the need for large volume continuous pours and the effects of heat and drying shrinkage following placement.



**Trevor Rushton**  
Chairman of  
Watts Group

**Punching shear**

Columns transfer loads to the foundations or other loadbearing elements of a building, but this can be complex and influenced by construction sequencing and temporary works. Over time, concrete shrinkage can lead to potentially significant changes in the way that the loads are transferred. Because a transfer slab is taking point loads, it must be designed to accommodate the risk of punching shear – the potential for the column to punch through the slab.

Doubts have been expressed over the design methodology applied to the design of slabs in this scenario. Engineers have found that the shear (slicing) forces (and live loads) encountered can be much higher than originally envisaged, particularly where there are short distances between offset columns.

Detecting punching shear is challenging because failure can occur with little visible warning. An early precursor can be the discovery of cracking in the structure, but this cannot be expected to occur in all cases or evidence might be misleading. Clearly, evidence of deflection in a flat slab beneath a column might trigger concern, but in an occupied building, particularly with suspended ceiling finishes, it might be very difficult to identify such movement without very detailed measurement.

“There have already been at least two instances of emergency building evacuations, and building owners have been advised to determine whether transfer slabs are present

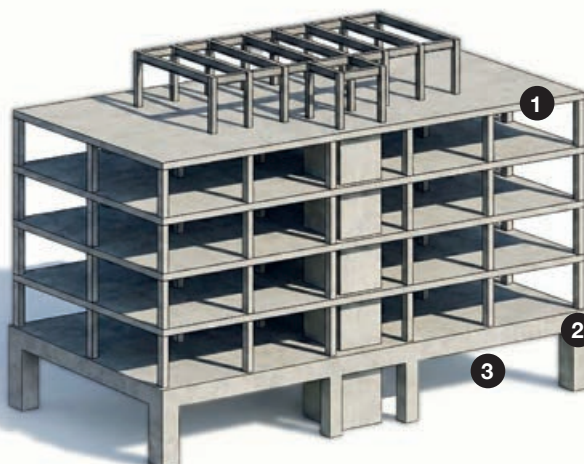
**Lack of design principles**

Historically, transfer slabs have not been designed using established principles, and no standard approach exists. Prior to the IStructE guidance issued in November 2024, engineers used a variety of design and modelling techniques. Since the introduction of the Structural Eurocodes in 2005, design standards are more performance-based and less informative.

While BS8110 has been withdrawn, compliance with building regulations is not dependent upon a specific code as long as the functional requirements are met. Thus, there is scope for various design methodologies including software-based techniques such as finite element analysis and 3D modelling. This is all well and good, but the uncertainty lies in the lack of consistency, the complexity of the different forces at play and the risk that a “one size fits all” approach to design can fail to provide adequate capacity.

The Institution of Structural Engineers has published guidance on this issue. Although primarily intended for engineers, the guide also provides advice in the verification of existing structures.

In its Practice Alert of 14 January 2026, RICS draws mainly upon the BSR’s advice: “The government is currently recommending that ▶



**The structure of transfer slabs**  
1. Roof acting as transfer slab  
2. Transfer slab  
3. Punching shear risks where columns bear onto transfer slab

WATTS GROUP

where there are visible signs of distress or specific concerns regarding a building's condition or design, building owners should seek immediate professional advice.

"RICS members who are chartered building surveyors may be instructed to carry out condition surveys of such tall buildings to identify buildings with transfer slabs. If a building is identified, then a suitable expert structural engineer will be required to carry out more in-depth analysis.

"RICS recommends that IStructE are contacted for suitable competent engineers."

#### Next steps

The risks are such that a warning should be issued, but the mere existence of a transfer slab does not mean that failure is inevitable or that immediate steps need be taken to evacuate the building or take additional precautions. The BSR is currently working with the Building Advisory Committee in co-operation with the Ministry of Housing, Communities and Local Government and so further guidance is likely to be

issued in due course. A prudent first step would be to review any potential cases to see if a transfer slab is likely to exist and start to narrow down the issue to more manageable proportions. Such an exercise ought to be within the remit of suitably experienced chartered building surveyors in the first instance, but detailed analysis is something that will demand structural engineering advice.

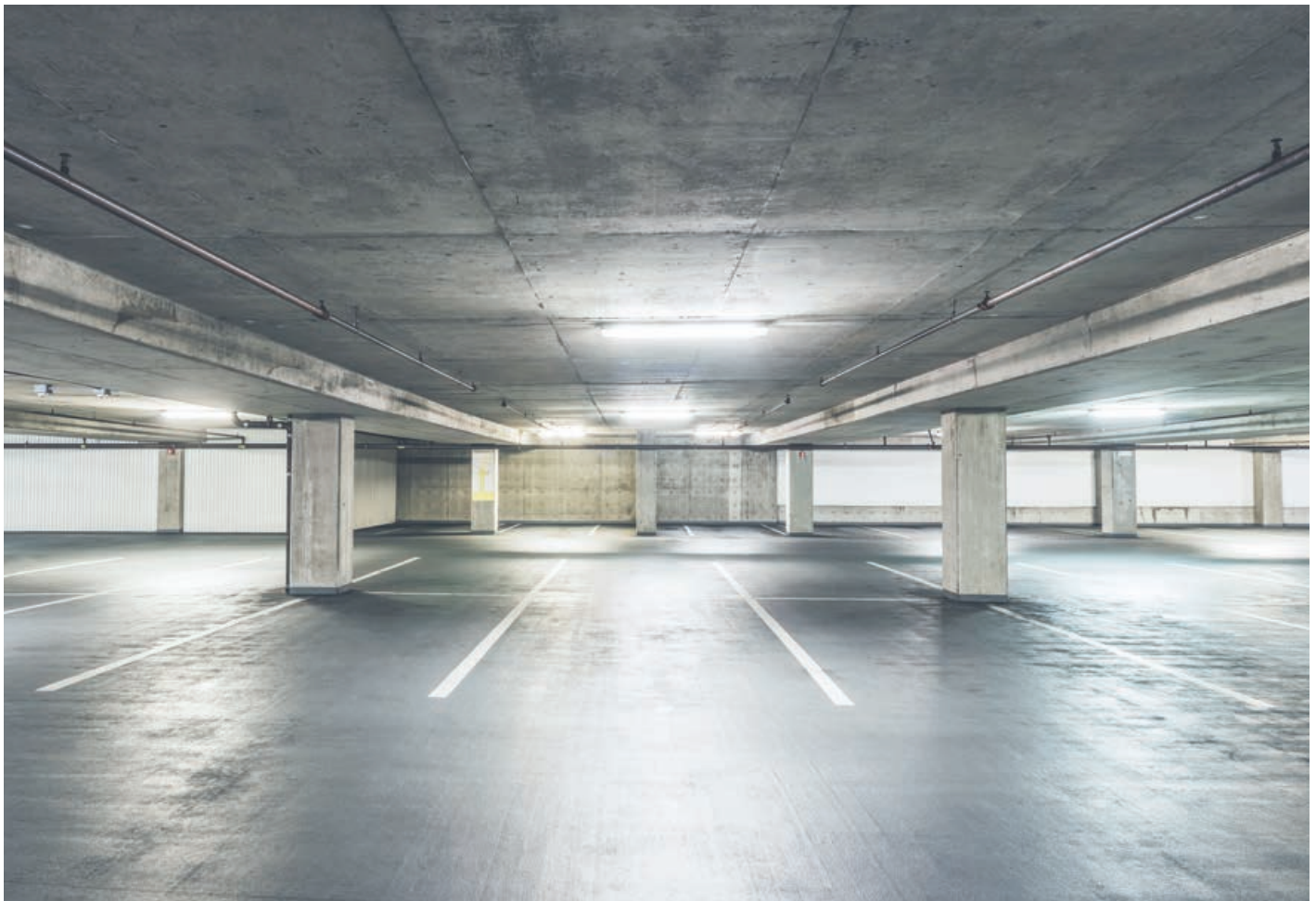
A desktop study of construction drawings ought to indicate whether there is potential for a transfer slab, but this will probably need to be followed up by site inspection. Examination of the structural philosophy, if it is within the health and safety file, may also show whether transfer slabs have been employed.

The difficulty arises in ascertaining whether there are visible signs of distress or specific concerns regarding a building's condition or design, simply because in a completed building most of the affected areas will be concealed from view either by finishes and furnishings

**“A desktop study of construction drawings ought to indicate whether there is potential for a transfer slab, but this will probably need to be followed up by site inspection**

or by suspended ceilings, insulation and so on. There will be an onus on surveyors to identify whether a transfer slab exists and pay very careful attention to visible areas to see if there is any evidence of cracking, deflection in floors, lack of verticality in columns or other defects that raise suspicion.

Deflection is probably the most common indicator of a problem; with the structure concealed from view, indicators may include ill-fitting partitions, windows, doors or furniture elements such as cupboards or desks no longer level or distorted. Deflection can also induce significant bending moments in columns or shear walls, hence the need to be vigilant for signs of unusual cracking.



### Guidance

Regulated firms need to have regard to the nature of the concerns and would be expected to have regard to the guidance available at the time of any survey. This would probably include the identification of a transfer slab, as opposed to a slab designed with downstand beams, and usually a recommendation for further enquiry.

In addition to the above, and specifically in relation to high-rise buildings, it is possible that building safety case reports may need to be revisited and amended.

A detailed analysis of a transfer slab is something that is outside the remit of the average chartered building surveyor, but recognition of the form of structure is not and there will now be a reasonable expectation that a surveyor will have flagged the existence or possible existence of this form of construction and made appropriate recommendations for further advice.

More detailed analysis is certainly the remit of a suitably qualified engineer, but they may also be faced with similar difficulties – lack of access, concealed surfaces and so on. There are various measures that should be possible to check, for example strength of concrete and thickness of slab, top and bottom reinforcement etc. Non-destructive techniques may help up to a point, but it's more difficult and potentially unreliable to determine the nature of the critical shear reinforcement near column bearing and head positions.

The project monitor may not be involved with quality monitoring, ie making a distinction between bank monitoring roles and monitoring for a purchaser or tenant, but the adoption of a transfer slab is probably something that could have consequences later in the life of a building. The monitor may not have the ability to influence design in the same way as a project manager, but it would be appropriate to flag at least that this form of construction is being used along with an explanation of the potential risks that may be involved.

**“More detailed analysis is certainly the remit of a suitably qualified engineer, but they may also be faced with similar difficulties – lack of access, concealed surfaces and so on**



### Legal position

There are several aspects to consider when analysing the legal position around transfer slabs. First, in terms of negligence claims for failing to identify a transfer slab say during a technical due diligence exercise, it may be that a reasonable defence is that until January 2026 (or arguably late 2024) the issue was not well known or understood. A reasonably qualified and experienced surveyor would not necessarily have been aware of the problem and so would not routinely report on it.

Post-January 2026, and given the RICS Practice Alert, the position may be less clear cut. Of course, if there were reasonable grounds to identify cracking, deflection or even visible signs of punching shear, then the position might be different.

Non-compliance with the current guide does not necessarily mean that the earlier design was negligent, building standards and practices change all the time and it is unreasonable to judge performance by comparison with documents that did not exist at the time of construction.

### High-rise residential buildings

Regarding the implications this will all have on high-rise residential

buildings, the building safety case will need to consider the existence of and the design of the transfer slab so that risks can be identified and dealt with. Such an exercise may dictate the need for a certain amount of back calculation by an engineer as well as physical inspection and potentially monitoring.

If a problem is identified, there may be mitigation measures such as the introduction of strengthening, propping or load reduction. The building safety course ought to be reviewed every five years unless there are indications of deterioration in the meantime.

### Continued confidence

By adopting a proportionate, evidence-based approach, beginning with the identification of potential transfer slabs and escalating to specialist engineering appraisal where justified, the industry can manage risk sensibly while awaiting further clarity from the regulator.

Understanding, careful documentation and early engagement with competent structural engineers will be key to ensuring building safety, regulatory compliance and continued confidence in the built environment. ■

# Staged submissions and the Building Safety Levy: devil in the detail

**Anthony Hayes** on a potential pitfall for those hoping to avoid the Building Safety Levy through staged submissions

The forthcoming Building Safety Levy as well as recent changes to the Building Safety Regulator's (BSR) position on staged submissions has generated much interest in the industry.

Since the new building control regime for higher-risk buildings (HRB) went live on 1 October 2023, the route for building control approval applications (or Gateway 2) is for a full submission that demonstrates a design, if built, should be fully compliant with all relevant requirements.

Staged submissions break this down into smaller sections, with the potential for the subsequent building work to be completed in separate stages. Originally seen by the BSR as a mechanism to be used for complex multi-tower constructions, their stance has since changed. New guidance, recently published, states that in addition to complex multi-tower designs, staged submissions will now also be accepted for single towers.

## Expectation

The regulation's expectation is that stage 1 will most commonly cover piling, foundations and structure up to the ground floor slab. Subsequently, stage 2 would cover the remaining aspects of design for the rest of the building. Further subsequent stages would be suitable in a multi-tower or single-podium-type design.

Each staged submission is therefore treated as an application in its own right, with a multi-disciplinary team (MDT) appointed to assess and provide a determination. The



**Anthony Hayes**  
Associate, Project  
Four Building Safety  
Experts Ltd

expectation from the BSR is that a single regulatory lead and MDT would assess all stages of a project, giving consistency to decisionmaking and an improved user experience in terms of communication and clarity for the applicant. However, a consequence of this, confirmed during recent dialogue with the BSR, is that subsequent stage applications can only be made once the preceding (or first) stage has been approved.

Along with the updated guidance from the BSR, the Construction Leadership Council published updated guidance to support Gateway 2 submissions at the end of 2025.

In addition to providing further detail for "regular" applications. The guidance aims to clarify the level of detail required as well as any additional requirements that will need to be met for a staged submission. These include additional supporting documents, revised folder structures and sets out what is expected of different elements of the design at each stage.

The expectation is that the outline design and coordination, RIBA stage 3, for the wider building will be complete at stage 1. For the work seeking approval at this stage 1 (or subsequent stages), the full and final RIBA 4 design needs to be submitted. The detailed design information needed to demonstrate compliance with that stage of work must be supported by the outline design of the wider building, demonstrating that any assumptions being made are realistic and in accordance with the wider compliance strategy. This is a critical part of the staged application, that design work for the whole

building is sufficiently progressed to allow these assumptions to be justified. Giving the BSR comfort that what is being approved at stage 1 will realistically be able to sustain subsequent stages without major changes be required.

## Focused applications

Smaller, more focused applications may allow the BSR to review and determine the application more quickly, meeting the statutory timelines for applications. Subsequent stages may also benefit from greater engagement with the BSR regulatory lead and MDT during earlier stages.

It also allows for more overlap in programme schedules, with detailed design work for the stage 2 submission ongoing while stage 1 is being determined.

There is also potential for construction work to start on site for stage 1 while stage 2 design work is being finalised or assessed by BSR. Particularly on schemes with more complex, and time consuming, piling and foundation designs this would give significant programme benefits.

Finally, it means the full design does not need to be finalised prior to the stage 1 submission, with potential for benefits in procurement of long lead time items, sub consultant appointments and reduced programme timescales.

## New process

Despite the advantages, this a relatively new process with only limited numbers of applications currently made to the BSR. Members of the MDT may also have different ►

“ Each staged submission is therefore treated as an application in its own right, with a multi-disciplinary team appointed to assess and provide a determination





**“Many feel that although the BSR has made significant recent progress in reducing determination periods, the upcoming Building Safety Levy deadline is likely to lead to a glut of applications**

interpretations on the required levels of information for each stage that could cause delays while requests for information are issued or risk a rejection.

Furthermore, coordination of the design must be effective to ensure that the stage 1 submission can support the design in subsequent stages. If design work for the subsequent stages isn't sufficiently advanced, then justifying assumptions made on compliance pathways become difficult.

Finally, there is a risk of having to stop work on site if subsequent stages are delayed in determination or rejected by the BSR.

**Building Safety Levy**

With the Building Safety Levy due to come into force on 1 October this year, it will require developers to pay a charge for residential developments based on the size of the development and the area in which it is built.

From this date, applications for building control approval will be

subject to paying the levy prior to completion of the building. For new-build HRBs, this means that applications to the BSR must be made prior to 1 October in order to be exempt.

Importantly, if this application was subsequently invalidated or rejected by the BSR, it would require a new application to be made. In this case, the project would become subject to the levy.

For staged submissions, it is important to note that each stage is considered to be a separate application under regulation 3 of The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023. This means that if a subsequent stage application were made after 1 October, the section relating to this application becomes liable to pay the levy. In a single-tower-type construction with two staged applications, this would likely mean the whole structure becoming liable for the levy.

**Deadlines and delays**

While the October deadline for submissions before the Building Safety Levy goes into effect seems to still be far off, the current 22-week average determination period for a new-build HRB means the window for submissions is closing rapidly. Indeed, if a stage 1 application followed this timescale, it would need to have been made prior to the end of April to allow the

**22**

The current 22-week average determination period for a new-build HRB means the window for submissions is closing rapidly

stage 2 submission to be follow before the October deadline. With timescales already tight and deadlines looming, any further delays are likely to significantly impact projects. However, many feel that although the BSR has made significant recent progress in reducing determination periods, the upcoming Building Safety Levy deadline is likely to lead to a glut of applications over the summer period, stretching resources still further.

**Looking ahead**

The relaxation of the BSR's position on staged applications has opened the door for a wider range of projects to benefit from this submission pathway. One which, if utilised correctly, has the potential to bring significant benefits to programmes, especially for complex and very large schemes. However, the positives must be weighed against the very real risks, meaning staged applications will not be the most effective strategy for all buildings. Early consideration of the submission strategy is key to ensuring the most suitable pathway is chosen.

It is likely that the implementation of the Building Safety Levy will make staged applications less attractive in the short term. However, post implementation, staged applications may deliver tangible benefits to project timelines and determination periods when employed on suitable projects. ■

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# CPD: Managing medical emergencies on construction sites

How should construction managers prepare for medical emergencies and trauma response on site, and what rules do they need to follow? **Mike Dowson** explains



Construction professionals manage risk through established health and safety systems designed to prevent harm on site. However, compliance and prevention measures cannot eliminate all incidents, including cardiac arrest. When a serious medical emergency occurs, preparedness and speed become critical.

In cases of cardiac arrest or severe bleeding, seconds matter and death can occur before

emergency services arrive. Growing awareness of this “care gap” has shaped public expectations. Widespread installation of public access automated external defibrillators (AEDs) has demonstrated how early intervention saves lives; more than 100,000 are registered on the emergency services-linked network The Circuit, and public bleed control provision is following a similar trajectory with Bleed Map.

## **An opportunity for increased site safety**

While AEDs and sufficient first aid equipment should be practicable within a risk assessment context, there are no specific legal requirements. Will one defibrillator be sufficient on a large site, or would two be safer? What are ambulance response times in the area?

On city-centre construction projects, contractors such as Graham

and GMI Construction have joined the public bleed control conversation by installing cabinets on external hoarding. Emergency services can direct the public to the bleed kit inside while it remains accessible to the onsite team.

Winvic Construction has taken inspiration from the compact lifesaving bags and selected to place large bespoke trauma response kits on its sites in November 2025 and deliver additional training (see case study box on following page).

This does not alter core legal duties or shift responsibility away from emergency services. It does, however, prompt closer consideration of how sites are planned and equipped for cross-contractor teams to act swiftly when an incident occurs.

**Why the first minutes are critical**

Catastrophic bleeding and cardiac arrest are time-critical emergencies where fast action saves lives. Preparedness becomes meaningful when planning becomes practice.

In cardiac arrest, the heart stops pumping effectively and immediate cardiopulmonary resuscitation (CPR) combined with rapid defibrillation offers the best chance of survival. In the UK, ambulance services attempt resuscitation in around 30,000 out-of-hospital cardiac arrests each year, yet fewer than one in ten people survive. With every minute without defibrillation, survival chances reduce by around 10%, so equipment must be quick to retrieve.

Modern defibrillators guide users with voice and visual prompts, analysing heart rhythm and delivering a shock only if required. They are engineered so non-medical responders can act safely, and public bleed kits are designed for untrained users.

The first UK bleed control kits were created by The Daniel Baird Foundation with West Midlands Ambulance Service following the

**“Catastrophic bleeding and cardiac arrest are time-critical emergencies where fast action saves lives. Preparedness becomes meaningful when planning becomes practice**



**Above: A bleed control kit on a Graham Nottingham site**

fatal stabbing of Daniel Baird in Birmingham. They contain clear instructions and an injury body map, enabling untrained users to select the correct component for a limb or chest wound and control severe bleeding quickly.

Uncontrolled blood loss can lead to loss of life in less than three minutes, so rapid action is essential until emergency services arrive. The items in kits are routinely used by paramedics and the military, helping address the care gap.

Public Access Trauma (PACT) Kits are being adopted by venues in response to the Terrorism (Protection of Premises) Act 2025, known as Martyn’s Law. While they contain many of the same components as standard bleed kits, they include multiples of each item to reflect the potential scale of an incident. The Manchester Arena attack, which prompted the legislation, exposed gaps in preparedness and access to emergency equipment.

Construction, as a higher-risk industry, can draw lessons from measures being implemented in venues.

**Emergency response as a project decision**

The effectiveness of any response is shaped by decisions made during project planning, site setup, training and communications. Beyond equipment, site layout, access routes, signage and briefings influence response speed. Consider:

- Checking theoretical response times – how long does it take to retrieve an AED or emergency trauma kit from different areas on site?
- The best location for speed of response – if retrieval time is not

sufficiently rapid, should equipment be relocated or additional medical points introduced to ensure coverage across the site?

- Access changing as construction progresses – do equipment locations need to be revised as the scheme evolves?
- Keeping everyone up to date – how can changes in equipment location be clearly communicated and signposted?
- Gaining feedback – can contractors and operatives confirm they know where the nearest equipment is located?

Under pressure, lost time can mean the difference between life and death.

**Training, certification and capability in practice**

The Health and Safety (First-Aid) Regulations 1981 require employers to provide adequate and appropriate equipment, facilities and personnel to ensure employees receive immediate attention if injured or taken ill at work.

For construction teams, a three-day First Aid at Work (FAW) course covers bleeding injuries and AED use and meets regulatory requirements. It is not practicable to train all staff to this level and HSE guidance requires:

- 5 to 50 employees – at least one first-aider trained in FAW;
- 50+ employees – at least one first-aider trained in FAW for every 50 employees (or part thereof).

While statutory requirements provide a baseline, enhanced preparedness requires broader capability.

Emergency response may be viewed as the responsibility of trained first aiders or the ambulance service. In practice, others are often first on the scene. Modern AEDs and bleed control kits are designed for ▶

## Winvic Construction’s bespoke emergency trauma response kit: what’s inside and why?

Winvic’s HSEQ team approached Turtle Medical, producer of The Daniel Baird Foundation bleed control kits and Enhanced PACT kits aligned with Martyn’s Law, to develop a bespoke medical kit for construction sites. The contractor sought guidance on equipment required to manage catastrophic bleeding injuries and burns, resulting in a bespoke kit supplied in a Winvic-branded bag.

In addition to shears, foil blankets, bandages and protective components such as CPR face shields and gloves, the kit contains multiples of key bleeding control items:

- Tourniquet – applied above a limb wound and tightened to reduce or stop blood flow.
- Haemostatic gauze – packed firmly into a deep

wound and used with direct pressure to promote blood clotting.

- Trauma dressing – placed over haemostatic gauze or directly onto a smaller wound to maintain compression.
- Vented chest seal – applied to penetrating chest injuries to prevent air entering the chest cavity and compromising breathing.

To increase familiarity with items found in the kits, therefore boosting confidence and speed of response in an emergency, Winvic team members have been undertaking a bespoke one-day trauma response course.

The medical emergency training which covers catastrophic bleeds, burns and other similar injuries, is designed to strengthen skills and is an addition to regulatory first aid certification.



Above: Turtle Medical’s bleed control kits contain clear instructions and an injury body map

“Social value activity is about delivering meaningful impact within host communities. Providing access to life-saving equipment and training is a tangible project contribution

untrained responders; prior training or familiarity reduces hesitation and improves response time.

Contractors providing practical briefings, familiarisation sessions and digital content can reduce uncertainty when it matters most. Consider:

- Clarity of messaging – give people confidence and permission to act, while ensuring emergency services are called immediately.
- Utilising existing resources – emergency services, charities and manufacturers provide instructional materials.

- Encouraging internal advocacy – team members with relevant experience can reinforce the importance of rapid action.

By integrating formal certification with proportionate familiarisation, construction teams can remain compliant while strengthening response capability and professional standards.

### Social value: big ideas

Raising awareness and providing additional training can benefit local communities. Organisations such as The Daniel Baird Foundation and Heartbeat Trust UK offer talks and training focused on bleed control and cardiac arrest response. A donation can fund knife crime awareness and bleed kit training in a local secondary school.

Social value activity is about delivering meaningful impact within host communities. Providing access to life-saving equipment and training is a tangible project contribution. Contractors could:

- Install a cabinet on external hoarding for 24/7 public access to an emergency bleed control kit and register it on The National Bleed Kit Network so emergency services can direct people to it.
- Install a wind- and solar-powered AED and bleed control cabinet to safeguard teams before permanent

power is available and support communities long term.

● Donate AEDs or bleed kits to the local community at project completion, rehome equipment from site offices or vehicles in public cabinets at schools, churches or convenience stores.

Effective emergency response is shaped long before an incident takes place. Through deliberate planning, formal training and broader workforce awareness of equipment and procedures, contractors can ensure every single person is confidently prepared to act when it matters most.

**Renewable power and GPS tech help with AED deployment**

Construction projects present challenges for AED deployment, particularly power supply and asset security.

Defibrillators should be stored above 10°C to ensure pad function and to protect the battery from low temperatures. External defibrillator cabinets are therefore heated, yet many locations lack a reliable power source, from rural villages

and urban parks to golf courses and infrastructure sites.

While site offices may maintain correct storage temperatures, early project phases or large schemes without power can leave teams vulnerable. To address this, Turtle Medical developed a wind- and solar-powered defibrillator cabinet, with a solar-only model available for temporary installation on construction schemes.

Power supply is not the only operational challenge. AEDs can be misplaced, relocated without record or stolen, and after deployment it can be difficult to confirm their location. Replacement costs are significant, but the greater risk is absence of life-saving equipment when required.

DefibTrack's live GPS and online portal enable movement alerts and real-time location monitoring. Winvic is currently trialling the technology, which supports asset oversight across complex and multi-phase construction sites and helps maintain continuous equipment availability. ■

**Mike Dowson is founder and managing director of Turtle Medical.**

**Right: A Winvic team member undertaking first aid trauma training**

**Below: Turtle Medical's Mike Dowson with a solar-powered defibrillator cabinet designed specifically for construction sites**



TURTLE MEDICAL



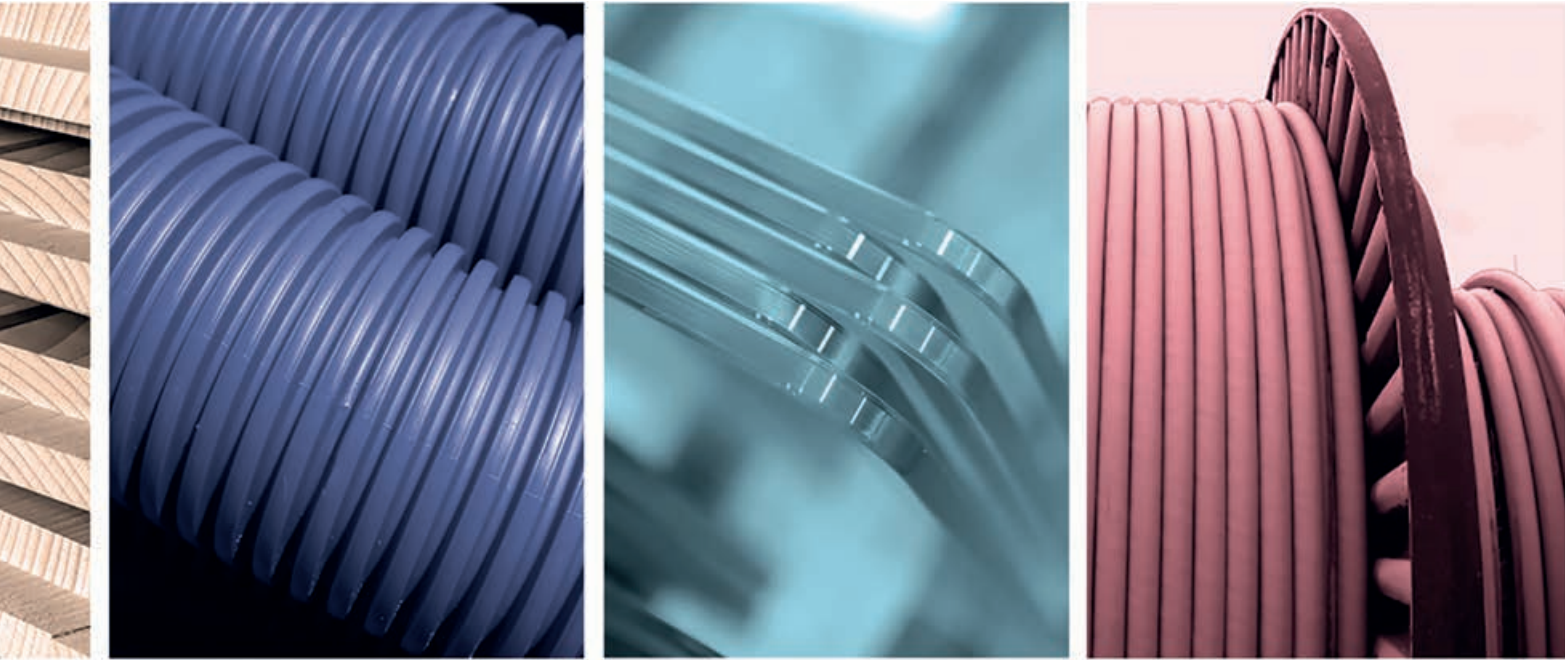
TURTLE MEDICAL

**CPD questions**

- 1) With every minute without defibrillation, a person's chance of survival reduces by...  
a) 0% b) 10% c) 5%
- 2) How do you use haemostatic gauze?  
a) Wrap it round a limb  
b) Place over a penetrating chest injury  
c) Pack it inside a bleeding wound
- 3) How many public access defibrillators are registered on The Circuit?  
a) Over 100,000  
b) Over 1,000,000  
c) Over 10,000
- 4) Which is the true statement?  
a) Defibrillators can be safely left in vehicles  
b) Defibrillators should ideally be kept above 10°C  
c) Defibrillators are placed in cabinets to recharge their batteries
- 5) Which is the false statement?  
a) Bleed control and trauma kits were designed to be used by anyone without training  
b) Bleed control and trauma kits contain components used by emergency services and the military  
c) Bleed control and trauma kits should be locked in a cabinet for onsite first aiders to access

To test yourself on the questions and collect CPD points, go to: [projectsafetyjournal.com](http://projectsafetyjournal.com)

“Through deliberate planning... contractors can ensure every single person is confidently prepared to act when it matters most”



# Construction products reform

Following her analysis of the 2025 amendments in the previous issue, **Rubina Zaidi** explores proposed General Safety Requirements and wider construction products reform

The regulation of construction products is undergoing its most significant reset in decades. The government has published its Construction Products Reform White Paper, alongside a consultation on the introduction of a General Safety Requirement (GSR) for construction products. Together, these represent far-reaching reforms in how construction product safety will be regulated, enforced and evidenced in Great Britain.

The consultations are set up to run together. Both opened on 25 February 2026 and will close at 11.59pm on 20 May 2026.

For those engaged in product safety, testing and certification, specification, procurement and enforcement, the reforms are notable as they propose tighter controls and also seek to fundamentally reshape the regulatory regime itself.

The objective is to ensure all construction products placed on the market are captured by a regulatory framework that prioritises safety, is supported by accurate information and is underpinned by effective enforcement.

## A two-route system

At the heart of the reforms is the introduction of a proposed GSR for construction products that are not currently covered by designated standards so that such products are brought within a regulatory framework.

The GSR will operate alongside the existing construction products regime (the GB-CPR) under which products covered by designated standards will continue to be regulated through a reformed version of the regime. The white paper confirms the GB-CPR will be strengthened and that the

government intends to align with aspects of the revised EU approach, which support its objectives and supply chain resilience.

Importantly, the two routes are intended to operate on a distinct basis, with products regulated either through the reformed GB-CPR or through the GSR.

## Filling the regulatory gap

The GSR consultation proposes a new, overarching statutory obligation that in-scope construction products must be safe.

The proposed duty is framed around intended use and reasonably foreseeable use. This represents a conceptual shift, particularly for innovative or bespoke products that do not readily align with harmonised standards.

The consultation also proposes obligations on economic operators across the supply chain, including manufacturers, importers and distributors, as well as specific duties for online marketplaces. This reflects their growing role in the construction products market and the associated challenges for traceability, surveillance and enforcement.

## Safety through information

The proposals in the white paper recognise that information failures can translate into safety failures.

The proposals emphasise the need for clear, current, accurate, accessible and reliable product information,



**Rubina Zaidi**  
Shoosmiths LLP



particularly in relation to safety-critical claims. The government signals an intention to strengthen regulatory controls over marketing and technical statements and to enhance the regulator's ability to challenge misleading or inadequately evidenced claims. Together, this should increase the likelihood that product safety issues will be identified early.

For manufacturers and distributors, the proposed reforms indicate that, in the future, safety-related claims must be demonstrably supported by evidence, not only within technical documentation but across wider product-related and marketing information.

**Digitalisation and traceability**

The white paper recognises the industry interest in digitalisation, including improved traceability and the possible role of digital product records.

While no single digital model is prescribed, the direction of travel is clear. Improved access to reliable product data is seen as critical to enabling safer decisionmaking throughout a product's lifecycle, from specification and procurement through to installation, maintenance and refurbishment. This reflects wider policy realisation, following on from the Grenfell Tower Inquiry, that safety depends not just on regulation at the point of manufacture, but on how information is shared and relied upon in practice.

“  
**The proposals emphasise the need for clear, current, accurate, accessible and reliable product information, particularly in relation to safety-critical claims**

**Testing, certification and assurance**

Another central pillar of reform concerns testing, conformity assessment and certification.

The white paper frames these activities as integral to public confidence in the construction products regime. It signals stronger oversight of conformity assessment bodies (CABs) and certification schemes, to improve consistency, competence and transparency and proposes an enhanced regulatory role for the national construction products regulator in overseeing UKAS's performance in relation to construction products.

While the details are subject to further consultation, the message is that conformity assessment will be regarded not simply as a commercial service, but as an activity with clear public interest responsibilities.

**Stronger enforcement and regulatory oversight**

The consultations envisage a more assertive role for the national construction products regulator.

The proposals include enhanced market surveillance powers, clearer enforcement roles, and a framework for offences, with criminal and civil sanctions, under the GSR. The intention is to create a system capable of intervening earlier, acting more decisively, and responding more effectively where unsafe products or misleading practices are identified.

**2027**

The full set of reforms proposed in both consultations are expected to come into force in late 2027

For dutyholders, this reinforces the need to treat construction product compliance as a strategic risk.

**Wider legal and regulatory implications**

One aspect of the reform programme that warrants particular attention is its interaction with wider legal risk, beyond simple construction product enforcement.

The white paper makes it clear that construction product regulation is no longer viewed in isolation, but as an integral part of the post-Grenfell building safety reforms, alongside the Building Safety Act 2022, the work of the BSR, and the government's response to the Inquiry's Phase 2 recommendations. Taken together, these reforms appear to indicate the emergence of a more integrated regulatory environment, in which product failings may potentially have implications across multiple regulatory regimes. ▶



**Left: The government's Construction Products Reform white paper**

In practice, this raises the prospect of overlapping regulatory exposure for manufacturers and others in the supply chain. Unsafe or misleadingly marketed products may engage not only construction product enforcement powers, but also wider product safety principles and trading standards activity.

The GSR consultation recognises the possible overlap of the GSR with the General Product Safety Regulation 2005 in relation to construction products that are also consumer products and clarifies that the GSR will take precedence so such products must comply with the GSR.

Further, the GSR consultation confirms that the new regime will apply across the United Kingdom – see para 1.3 (&1.4) on page 4 of the GSR consultation – and that the government is working with stakeholders to ensure that the GSR regulations comply with both the Windsor Framework and the United Kingdom Internal Market Act 2020.

**“ Responses to the consultations will shape the scope of future regulations, and also the practical expectations placed on all those in the construction product supply chain and enforcement bodies**

**Engagement**

Further consultation on the details of the reformed GB-CPR framework is anticipated later in 2026, following the conclusion of the white paper consultation, with indications that secondary legislation for the GSR could be introduced towards the end of 2026. The full set of reforms proposed in both consultations are expected to come into force in late 2027, subject to parliamentary time.

Stakeholder engagement at this stage is therefore critical. Responses to the consultations will shape the scope of future regulations, and also the practical expectations placed on all those in the construction product supply chain and enforcement bodies for years to come.

The consultations mark a decisive move towards a more coherent, riskbased and enforceable construction products safety regime.

For all engaged in the construction product supply chain, the key challenge will be adapting to a regime in which safety is assessed not just by reference to compliance with standards, but by reference to evidence, information quality and intended and foreseeable use. Organisations that prepare early, by reviewing governance arrangements, evidence trails and information systems and controls, will be best placed to navigate the transition and operate confidently within the reformed regulatory environment. ■



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# Northern Ireland update

The country's long-awaited building safety reforms are moving forward, but a full legislative regime remains some way off, explains **Paul Cheyne**

Unlike England, which implemented the Building Safety Act in 2022, Northern Ireland is still developing its own framework, led by the Department for Communities at Stormont.

The current programme stems from the findings of the Northern Ireland Expert Panel on High-Rise Residential Buildings, whose report, published in December 2023, highlighted significant weaknesses in the existing system and called for wide-ranging reform. In response, the Department for Communities established a dedicated Residential Building Safety Division and, in early 2024, formally launched a programme to improve fire safety and develop a new legislative framework.

## Groundwork focus

Throughout 2024, the focus was on groundwork. Officials carried out research, scoped policy options, and engaged with residents, building owners and industry professionals. A roadmap published later that year set out how the panel's recommendations would be taken forward, signalling a shift from evidence gathering to structured policy development. By the end of 2024, a clear direction had emerged, but the detail of how a new system would operate remained undecided.

That changed in January 2025, when the department moved into a co-design phase. Bringing together stakeholders from across the construction and housing sectors (including APS representation), the initiative aimed to collaboratively shape the future building safety regime. Early sessions quickly expanded into a wider programme



**Paul Cheyne**  
Director,  
Hasco Europe

running through the first half of the year, tackling key issues such as professional competence, regulatory oversight, accountability and the management of building safety information.

In total, 13 co-design sessions were delivered between January and June 2025, involving more than 300 participants. The scale of engagement underlined both the complexity of the task and the department's intention to build a system tailored to Northern Ireland rather than simply replicating the approach taken elsewhere in the UK.

Following this intensive period of collaboration, attention turned to refinement. In the latter half of 2025, officials began drilling into the technical detail, establishing smaller task-and-finish groups to work through complex policy areas. Further engagement with residents in November ensured that those living in high-rise buildings continued to have a voice in shaping the reforms.

## Moving forward

As of early 2026, Northern Ireland remains firmly in the policy development phase, with progression to legislation dependent on Executive approval. Following the completion of co-design and subsequent technical refinement through task-and-finish groups in late 2025, the Department for Communities has developed its policy proposals, but must secure agreement from the Northern Ireland Executive before moving forward. Only once that approval is obtained can the department proceed to formal consultation and the drafting of primary legislation.

This means that, while the direction of travel is now well established, a Building Safety Bill has not yet been introduced, and any legislative timetable remains contingent on that point. In practical terms, this places Northern Ireland at a gateway stage, poised to move into legislation, but not yet authorised to do so, leaving it likely that 2027 will be the earliest the legislation could be enacted. ■

**“Further engagement with residents in November ensured that those living in high-rise buildings continued to have a voice in shaping the reforms**

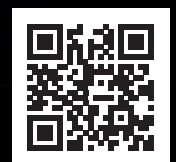


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# Refining professional practice

This year's APS National Conference will return to a face-to-face format, focusing on effective collaboration across project teams, with Dame Judith Hackitt delivering the keynote address



APS is delighted to announce that Dame Judith Hackitt will deliver a keynote address at the APS National Conference 2026, marking a major moment in the return of the flagship event to a face-to-face format.

A defining force in building safety reform, Dame Judith's ongoing impact on regulation, competence and accountability makes her the fitting keynote speaker for this year's theme: *Beyond Compliance: When regulation is only the starting point*. Her address will set the tone for a conference focused on how the industry moves from meeting regulatory requirements to demonstrating leadership, culture change and high-quality outcomes across the built environment.

Taking place on Wednesday 9 September at Aston University in Birmingham, the event marks APS' first in-person national conference in several years. After a period of successful online delivery, the return to the room offers members a valuable opportunity to engage directly with regulators, policy makers, industry leaders and peers, and to reconnect through discussion, debate and shared learning.

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## The programme

The conference will open with a welcome from APS President Mark Snelling, who will frame the day's discussions around the role of compliance, its limitations and the increasing importance of professional practice.

Across the morning programme, delegates will explore how organisations can build capability, culture and competence beyond minimum standards. Sessions will consider how competence is demonstrated and managed in practice, the role of values-led safety leadership, and the importance of effective collaboration and shared responsibility across project teams.

Further sessions will focus on the CDM post implementation review,

providing insight into how roles and responsibilities are evolving within the wider building safety regime. Information management will also feature prominently, examining how digital, accurate and intelligent information can move beyond compliance to support assurance, accountability and better decisionmaking across the building lifecycle.

## Dame Judith Hackitt

Delivered at the heart of the programme, Dame Judith's keynote will reflect on post-Grenfell developments, regulatory expectations and the professional responsibility to commit to a high-quality built environment.

Her perspective provides a timely challenge to the sector: to embed competence, accountability and professional values as the foundation of practice, not the exception.

The remainder of the afternoon programme builds on this theme, with sessions on fire safety competence and statutory requirements, the future direction of building control reform, and a panel discussion exploring post-Grenfell developments across the four UK nations, bringing together perspectives from senior policy makers in England, Scotland, Wales and Northern Ireland.

Ticket sales are now open, and with limited capacity at Aston University and strong demand anticipated following the announcement of Dame Judith as keynote speaker, members are encouraged to book early to secure their place.

The APS National Conference 2026 promises a timely, practical and thought-provoking day, exploring how the industry is redefining success, not just complying with regulation, but leading with competence, accountability and confidence. ■

**The APS National Conference 2026 takes place at Aston University, Birmingham on Wednesday 9 September. For more information head to [www.aps.org.uk/aps-national-conference-2026](http://www.aps.org.uk/aps-national-conference-2026)**



Dame Judith Hackitt will deliver the keynote address

# IS YOUR WORKFORCE TRULY COMPETENT?

## The data says there's a gap.

- Only **45%** consistently meet competence standards
- **46%** report costly skills gaps
- **44%** of employees need additional training

## What's at risk?

- **42%** reputational damage
- **39%** workplace incidents



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APS Accredited - The Role of the Principal Designer under CDM 2015 (2 Day)	Birmingham	17-18 Jun 2026	£695 + VAT
APS Accredited - The Role of the Principal Designer under CDM 2015 (2 Day)	Leeds	8-9 Jul 2026	£695 + VAT
APS Accredited - The Role of the Principal Designer under CDM 2015 (2 Day)	Nottingham	18-19 Aug 2026	£695 + VAT
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APS Accredited - Building Safety Act & PD Building Regulations 2023 (2 Day)	Nottingham	7-8 Jul 2026	£695 + VAT
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APS Accredited - CDM 2015 for Principal Contractors	Online	17 Jun 2026, 9 Jul 2026	£250 + VAT
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APS Accredited - BSA & Building Regulations (England) Dutyholder Introduction (1 Day)	Online	25 Aug 2026	£325 + VAT