



# Building Safety Act – Weekly drop-in session



# OUR PRESENTERS



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## **OUR AGENDA FOR TODAY**





# Agenda:

- Quick recap from part 1 of this series
- What are the Building Safety Act Common Assessment Standard (CAS) questions?
- Advice on how to submit the evidence without multiple rejections
- What does this mean for you as a subcontractor?
- How we can help and guide you through it

## **Session dates:**

03-09-2025	10-09-2025	17-09-2025
24-09-2025	01-10-2025	08-10-2025



## **RECAP FROM PART 1**







In July 2024, the Common Assessment Standard was updated to include a new section along with amendments to others. It is divided into 10 sections for ease of completion, based on UK legislation and designed for use by construction companies in the UK.

This included a new **Building Safety section**, ensuring it can be used to demonstrate companies have the organisational capability to fulfil their roles under the Building Safety Act in an advisory status.

Released in July 2025, Build UK's Version 5 brings an important change: the Building Safety section is now compulsory for all companies operating within the scope of the Building Safety Act & Building Regulations 2010.

Starting soon, the requirement **will be included** within the Constructionline Gold and Platinum verification process and therefore you will be unable to obtain Gold and Platinum without saying **YES** and **passing** or saying **NO** this does not apply to our business.



Identity



**Financial** 



Corporate & Professional Standing



Health & Safety



**Environment** 





Building Safety



Fairness, Inclusion & Respect



Information Security



Information Management

## **UPDATE ON INDUSTRY PROGRESS**





Since the introduction of the Building Safety Act (2022), there has been increased change and pressure on construction contractors to legally possess the required level of organisational capability, as outlined within Part 2A – Duty holders and Competence, of the Building Regulations 2010.

There is considerable misunderstanding within the industry, with many organisations experiencing difficulty in determining the scope of the Act and identifying to whom and to what it applies.

- 59% of organisations have said this doesn't apply to them
- 3% of organisations have passed with a YES answer
- 7% of organisations have answered YES but still to pass
- 31% of organisations are yet to provide a response

A review of the Opt-Out reasons submitted by organisations shows that, based on their company names and work categories, there is confusion about whether they should have selected "yes."



#### Main Contractor Deadline





Top contractors from the UK construction industry have not only come together to *sign an open letter* about their changing construction supply chain requirements in line with the Building Safety Act, but to share an *important video message* about the building safety legislation; its impact on their supply chain members; and the wider community.

They have given a deadline of the 1st October 2025 for their supply chains to complete the latest version of the Common Assessment Standard questions, including its Building Safety section.

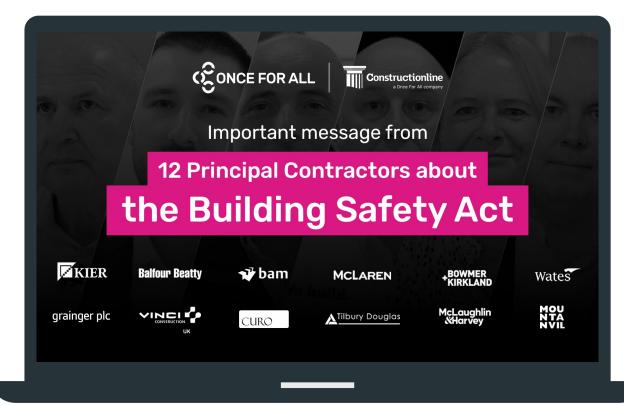
Constructionline Gold and Platinum memberships meet the requirements of the Common Assessment Standard.



Watch the full video here



Read the letter here



#### **CUBE CONSTRUCTION CONSULTANTS**

Who and what does the Building Safety Act apply to?





What is the Building Safety Act?

Who and what does the Building Safety Act apply to?

Next steps for subcontractors and how we can help?

## What does the Building Safety Act cover?

# What is and is not covered in the Building Safety Act?

The Building Safety Act has a focus on the construction industry providing buildings that are safe to those who occupy them.

There has been a common misconception that the Building Safety Act only applies to high risk or <u>high rise</u> buildings.

This is incorrect: it applies to ALL building works covered by building regulations with only a few exceptions.



All projects



Higher-risk buildings (HRBs) including all construction, refurbishment, maintenance and occupation



Site safety processes and procedures Occupational health





Next steps for subcontractors to get support for successfully completing the Building Safety section of the Common Assessment Standard (CAS)









or intent.



Remember - Organisational capability is only relevant and proportionate to the works you do

capability?









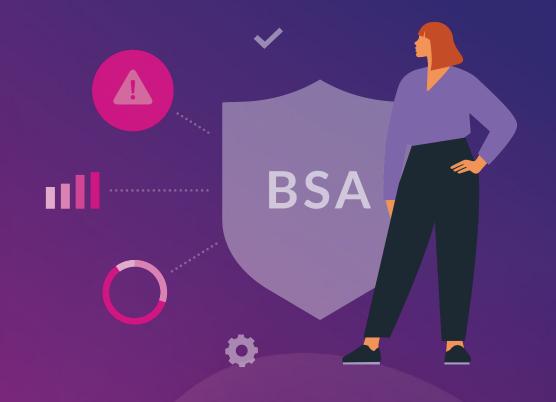


Occupational health





# What are the BSA CAS Questions?



*Version 5 – July 2025* 



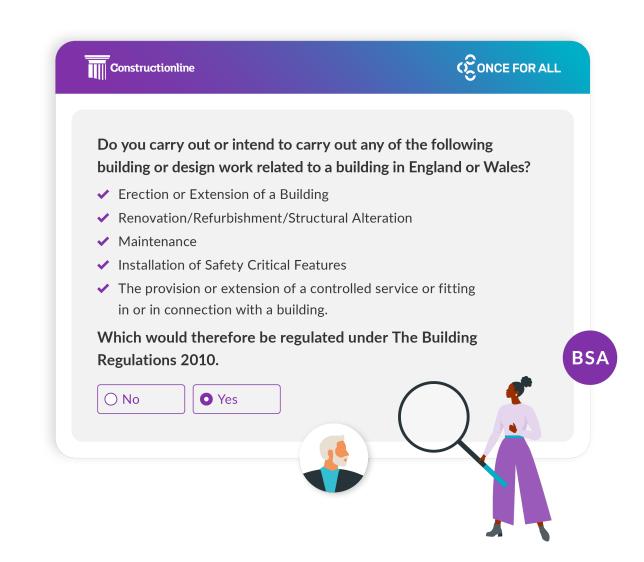


#### **The Most Important Question:**

The first question in the requirement is asking you to confirm with a YES answer if ANY of the work you undertake is regulated under the Building Regulations.

Make sure you consider carefully whether your works would fall into the scope of the Building Safety Act and Building Regulations.

IF you do answer no, you can change this answer at any time.

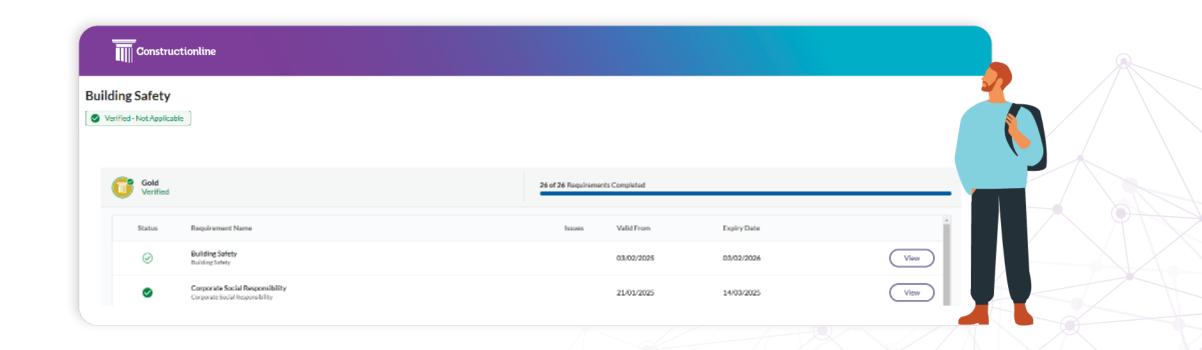


# What does this section apply to?





If you do opt-out, a 'Verified - Not Applicable' status will be applied to the section.



What does this section apply to?





Opting out of Building Safety can have significant consequences, especially given the impact of the Building Safety Act. Here's a breakdown of the points you should consider:



#### **Impact on Future Opportunities:**

- If you choose to opt out, you might miss out on work that falls under the scope of the Building Safety Act & Building Regulations. This could include major projects where safety regulations and compliance with this Act are a priority.
- Prospective clients or contractors who require compliance with the Act may ask you to complete this section later on when bidding for future work that falls under this law.



## **Visibility of Opting Out:**

- Your decision to opt out will be visible on your profile. This means that potential clients and contractors can see it when considering you for future opportunities.
- Opting out could influence how your organisation is perceived and could be a factor when potential buyers are deciding which partners to work with, particularly on projects that require Building Safety compliance.



#### **Careful Consideration:**

- You should thoroughly evaluate whether opting out aligns with your business goals and long-term strategy. If your company plans to engage in projects that involve any construction project where the 2010 Building Regulations apply, or any other works governed by the Building Safety Act, it might be beneficial to stay compliant by not opting out.
- If you're not currently pursuing such work, it's important to consider the future and whether opting out could limit your potential as the demand for Building Safety Act compliance becomes more widespread.

# HOW TO COMPLETE THE BUILDING SAFETY SECTION

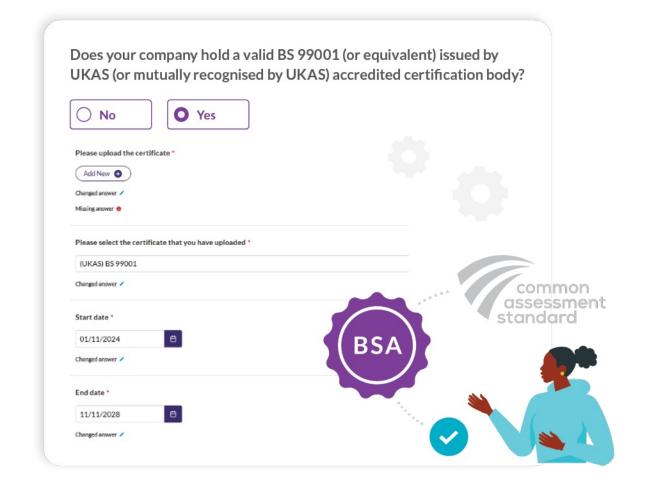




#### What questions do I need to answer?

Customers who have been assessed to the standard BS 99001 are exempt from completing the section and should provide a copy of their BS 99001 certificate.

BS 99001 is a Quality Management Systems Standard for the Built Environment, specifically, and it builds on BS EN ISO 9001, however BS EN ISO 9001 is NOT EQUIVALENT to BS 99001 and will not be accepted for this question. This is because ISO 9001 lacks specifics for the built environment. BS 99001 has been developed in a post-Grenfell world.



# **COMPLETING THE BUILDING SAFETY SECTION**





What questions do I need to answer?

All customers who do not provide an exemption, will need to first complete a series of questions covering the knowledge, skills, experience and behaviours required to work on buildings of all types and scales, followed by evidence demonstrating this.

All evidence will need to consider both your own staff and key subcontractors.

Customers who utilise subcontractors will also additionally be asked a 7th question as to how they ensure the subcontractor's workforce have competencies relating to work on buildings (fire safety, structural failure) which could be evidenced through an enhanced PQQ covering those competencies.

- 1. Does your company have arrangements in place to manage and record evidence of competency (Skills, Knowledge, Experience and Behaviours) for your workforce and key sub-contractor roles? (Results in 2 questions)

  Arrangements AND Evidence demonstrating systems for managing key competencies relating to work on buildings (policies and training matrix/ training needs analysis)
- 2. Does your company have arrangements in place for your workforce and key sub-contractor roles under its control to receive appropriate supervision, instruction and information to ensure that any work your company undertakes meets relevant requirements? Arrangements/ procedures for providing appropriate supervision, instruction and information specifically when working on buildings (process supervisory framework/ organogram per site activity detailing accountability)
- 3. Does your company have arrangements in place for ensuring the Client is aware of its duties under the Building Safety Act? Arrangements for communicating the Client's duties to them (typically a template letter/email)
- 4. Does your company have arrangements in place to ensure you keep up to date with changes to relevant requirements? A step-by-step account of how you will ensure you keep up to date with any legislation changes
- 5. Does your company have arrangements in place to cooperate with other duty holders to ensure that any building work or design work (whichever is applicable) is compliant with relevant requirements?
  - Arrangements for communicating formally with other duty holders around issues of compliance (project team meeting minutes/ notes)

# **COMPLETING THE BUILDING SAFETY SECTION**



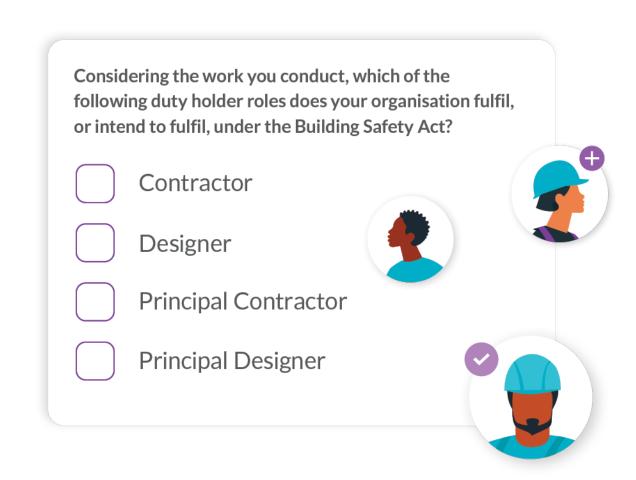


What questions do I need to answer?

# Duty holders apply to all works within the scope of the Building Safety Act.

- Everyone involved in the design and construction of a building has a role to play and must be competent to carry out their responsibilities.
- The client, principal designer, principal contractor, designers, and contractors each have specific duties to support and enable the process.
- The overarching purpose is to ensure compliance with the relevant building regulations.

You will be required to select all duty holder roles you are undertaking. Once selected, you will be presented with specific questions tailored to each chosen role.



# HOW TO COMPLETE THE BUILDING SAFETY SECTION





#### What questions do I need to answer?

All customers will then be asked if they intend to work on any Higher-Risk Buildings. Whether buildings are higher risk is dependent on their height, use, legal definition and whether they fall into an exempted category.



A good starting point is to consider that a Higher Risk Building will most often be a building in England that:



(a) is at least 18 metres in height or has at least 7 storeys



(b) contains at least 2 residential units

However, you will also need to consider that the definition of higher-risk building extends throughout a building's life and not just the initial planning and construction. The government has produced specific guidance around determining whether a building is Higher Risk during different periods defined in the Building Safety Act:















# SONCE FOR ALL

Please provide your procedures for providing appropriate supervision, instruction and information to your workforce and key sub-contractor roles under your control. This is to ensure that any work your company undertakes meets relevant requirements (e.g. Building Safety Act, Building Regulations, other legislation and industry standards).

# SUPERVISION, INSTRUCTION AND INFORMATION

# Top 5 Rejected Questions - Common Rejections



#### Not addressing all relevant legislation and standards

• Responses focus only on CDM Regulations and fail to demonstrate compliance with the **Building Safety Act**, **Building Regulations**, and wider industry standards. Applicants must show how their systems and processes meet the full scope of applicable requirements, not just one regulatory framework.



#### Failure to fully read and respond to the question

• Answers sometimes only provide partial information or discuss one aspect of the requirement. The question specifically asks about arrangements for both **the workforce and subcontractors**, and incomplete responses suggest a lack of attention to detail or understanding of the scope.



#### Omitting one of the required groups

 Many responses mention subcontractors but fail to explain how the direct workforce is managed, supervised, or supported. Both groups must be clearly addressed to show consistent arrangements across all roles under the applicant's control.







# SUPERVISION, INSTRUCTION AND INFORMATION

# Top Rejected Questions - Acceptable Evidence

Proper supervision and clear instructions help minimise mistakes, defects, and unsafe practices, protecting workers and the public. They define roles and responsibilities, reducing confusion and ensuring accountability. Standardised processes streamline workflows, reduce delays, and improve communication, contributing to more reliable and efficient projects. Non-compliance can lead to severe legal and financial consequences, including stop-work orders, fines, or even imprisonment, and may invalidate insurance coverage, leading to financial losses.

- A Quality Management Policy or statement addressing building work.
- A process ensuring each team has a designated supervisor responsible for their work.
- A skills matrix/framework outlining the required supervision level for each on-site activity.
- Procedural arrangements that specifically address the points put forth in the question.
- Template documents.
- Meeting notes and records of discussions with the workforce and key subcontractors.









Please provide your arrangements for managing and recording key competencies (Skills, Knowledge, Experience and Behaviours) for your workforce and sub-contractors.

Please provide evidence demonstrating your systems for managing and recording key competencies (Skills, Knowledge, Experience and Behaviours) for your workforce and sub-contractors. This may be evidenced by a Training Matrix, Training Records, upcoming Training / CPD programmes.

# SKILLS, KNOWLEDGE, EXPERIENCE AND BEHAVIOURS

# Top Rejected Questions - Common Rejections

- One question requires details of the arrangements in place (the "how"), while the other requires evidence showing those arrangements have been implemented. The distinction has not been addressed.
- No evidence has been provided that is specific to the Building Safety Act or Building Regulations.
- Behavioural requirements within competency (Skills, Knowledge, Experience and Behaviours) have not been covered.
- Evidence of fire-specific training is missing.
- Evidence provided relates solely to CDM 2015 and does not demonstrate compliance with wider requirements.
- The information submitted is out of date and does not reflect current standards.
- Some answers appear to be AI-generated or generic, stating that the company "will" address issues but failing to provide practical steps, processes, or examples of implementation.





# SKILLS, KNOWLEDGE, EXPERIENCE AND BEHAVIOURS

# Top Rejected Questions - Acceptable Evidence

A structured competency framework must be in place, outlining the required skills, knowledge, experience, and behaviours for each role on the site. Competencies should be categorised based on trade, specialisation, and responsibilities, such as electricians, bricklayers, site supervisors, and project managers, to ensure clarity and alignment with project needs. During onboarding, it's essential to verify competency documents to confirm the qualifications of new team members. Competency assessments should be carried out both initially and periodically. Behavioural assessments should be conducted to evaluate leadership, teamwork, and professionalism and address skills gaps

- Training Needs Analysis (TNA) and policy, process or procedure outlining how training will be managed.
- Training Matrix.
- Documented training records.
- Toolbox Talks (TBT) sessions. If submitted, it must include details of the topic covered, a signed attendance sheet and evidence of feedback/questions from attendees.
- Specific training relating to fire and structural safety.
- Training on relevant legislation and Approved Codes of Practice (Building Safety Act and Building Regulations Approved Documents as examples)
- Training relating to Quality Management.
- Evidence of an active Continuing Professional Development (CPD) program.







Please provide the arrangements you have in place to plan, manage and monitor the Building Work you undertake to ensure the work complies with relevant requirements (e.g. Building Safety Act, Building Regulations, other legislation and industry standards), in your duty holder role as a Principal Contractor and/or Contractor.

# PLAN, MANAGE AND MONITOR BUILDING WORK

# Top 5 Rejected Questions - Common Rejections

Not addressing the duty holder roles specific to them.

- Submissions do not set out how the organisation recognises and fulfils the statutory duty holder roles introduced under the Building Safety Act (e.g., Principal Designer, Principal Contractor)
- There is no evidence that these roles have been formally assigned, that responsibilities are documented, or that individuals in these roles are competent and trained to discharge their duties.
- Without clear role allocation and evidence of competency for each role, compliance with the Act cannot be demonstrated.

General policy and arrangements for CDM 2015, not including requirements concerning the Building Safety Act and Building Regulations.

- Evidence provided focuses only on Construction (Design and Management) Regulations 2015, which, while relevant, does not demonstrate compliance with the Building Safety Act or Building Regulations.
- Submissions lack detail on how CDM processes have been adapted to meet new and additional obligations particularly those relating to higher-risk buildings, resident safety, and the golden thread of information.
- Organisations must provide policies, procedures, or arrangements that explicitly reference the Building Safety Act and Building Regulations, showing integration with CDM rather than reliance on CDM alone.





# PLAN, MANAGE AND MONITOR BUILDING WORK

# Top 5 Rejected Questions - Common Rejections

Selecting more than one duty but only supplying information relating to a single duty holder.

- The submission indicates multiple duty holder roles (e.g., Principal Contractor and Contractor) but provides evidence or arrangements only for one role.
- This creates gaps in demonstrating how the organisation meets all statutory responsibilities for each selected duty holder.
- Evidence must show competency, arrangements, and compliance for every role selected, not just a subset.

#### Contractors mistakenly believe that the duty only belongs to Principal Contractors.

- Responses indicate a misunderstanding of statutory responsibilities: contractors assume they have no duties under the Building Safety Act beyond the Principal Contractor's obligations.
- This is incorrect, as the Act imposes specific duties on multiple duty holders (e.g., competence, information sharing, compliance with Building Regulations).
- Organisations must clearly demonstrate awareness of all relevant duties, provide evidence of compliance, and ensure staff understand their obligations.







# Top Rejected Questions - Acceptable Evidence

Effective communication with other duty holders ensures coordination and transparency, supporting the Golden Thread of Information and ensures coordination between duty holders and supports safe and compliant work. Proper planning also facilitates inspections, audits, and a smooth handover process. By implementing these measures, you protect lives, avoid penalties, and ensure long-term safety and compliance in all your projects

- Quality Policy addressing compliance with Building Regulations related to fire safety /structural integrity.
- Key Performance Indicators (KPIs) and methods for tracking them throughout the project.
- Monitoring procedures, including periodic checks, audits, and management responses.
- Project reviews assessing overall performance and compliance.
- Template documents used in project planning and compliance.
- Meeting notes and records of discussions.
- Information exchanges on topics like Building Regulations and fire safety.









Please provide evidence of how you communicate (or intend to communicate) with the client, confirming that they are aware of their duties under The Building Safety Act.

Top 5 Rejected Questions

# Top 5 Rejected Questions - Common Rejections

A new process for contractors who may have never communicated with Clients.

- Some contractors have not previously had direct interaction with clients, so there is no evidence of established processes for client communication.
- Effective communication with clients is required under both the Building Safety Act and CDM 2015, particularly for sharing information on risks, progress, and compliance.
- Organisations must demonstrate that contractors are trained and competent to communicate with clients appropriately, with supporting procedures or records.

Misconception that the Principal Contractor's role is communicating with the client and that only the PC can do so.

- Some submissions reflect the incorrect belief that only the Principal Contractor may interact with clients.
- While the PC has specific responsibilities, other duty holders (including contractors) have legal obligations to share information with clients as part of compliance and safety management.
- Evidence should clarify roles, responsibilities, and the processes in place to ensure all parties who need to communicate with clients are competent and authorized to do so.







# Top 5 Rejected Questions - Common Rejections

The evidence provided does not reference Building Work. An example is appointment letters under CDM 2015 submitted without a mention of the Building Safety Act or Building Regulations.

- Submitted documents, such as appointment letters, policies, or procedures, refer only to CDM 2015 obligations and do not explicitly address compliance with the Building Safety Act or Building Regulations.
- Without direct reference to "Building Work" or the statutory duties under these frameworks, it is unclear whether the organisation is meeting the specific requirements of the legislation.
- Evidence must explicitly demonstrate how appointed roles, contracts, and responsibilities incorporate both CDM 2015 and the Building Safety Act/Building Regulations requirements.

#### The evidence provided does not reference Building Work.

- More broadly, submitted evidence (training records, risk assessments, policies) is generic and does not show application to Building Work covered by the Building Safety Act.
- It is essential that all documents and records clearly demonstrate relevance to regulated building activities, ensuring traceability of compliance and accountability.
- Evidence should link directly to Building Work and show how duties, processes, and arrangements apply in practice.





# Top Rejected Questions - Acceptable Evidence

All organisations should show competency to help the client understand and fulfil their legal responsibilities. This communication also clarifies roles and responsibilities, making it easier to establish accountability and avoid misunderstandings. Ensuring the client is aware of safety and structural integrity duties reduces risks and protects workers, tenants, public. Additionally, confirming their awareness promotes smoother collaboration, fewer delays, and a higher likelihood of meeting safety standards by demonstrating due diligence, showing that you are committed to maintaining the highest building safety standards

- Written Confirmation.
- 🗜 Signed Acknowledgement.
- Meeting Minutes or Notes.
- Correspondence with Legal or Compliance Teams.
- Project Documentation.







# **QUESTION RESPONSES**

#### **General Themes**

#### Not providing formal policies, only statements or explanations

Applicants are often submitting narrative explanations or general statements of intent instead of documented policies,
procedures, or records. While explanations may describe how the company believes it operates, they do not provide verifiable
or auditable evidence that formal systems are in place. Formal written policies, training records, role-specific responsibilities,
or monitoring arrangements are required to demonstrate compliance with the Building Safety Act and Building Regulations.

#### Only referencing CDM 2015, not the Building Safety Act

Evidence submitted frequently refers to CDM 2015 requirements without acknowledging the Building Safety Act or Building Regulations. While CDM remains relevant, it does not cover the full scope of building safety legislation. The Building Safety Act introduced additional duties and a different focus, particularly around fire and structural safety, competency, and accountability. Submissions that ignore or fail to reference these specific obligations cannot demonstrate compliance with the current legal framework.

#### Not recognising that BSA duty holder roles differ from CDM duty holder roles

• Some applicants treat the roles and responsibilities under the Building Safety Act as identical to those under CDM 2015. This is incorrect. For example, under the BSA, the Principal Designer and Principal Contractor roles carry additional legal responsibilities relating to building safety that are not present under CDM. Evidence that merges or confuses the two frameworks does not demonstrate that the organisation understands or has arrangements in place for the specific requirements of BSA duty holders.





# **QUESTION RESPONSES**

#### **General Themes**

#### Selecting too many duty holder roles

• Some applicants indicate that their organisation fulfils multiple duty holder roles under the Building Safety Act (e.g., Client, Principal Contractor, Principal Designer, Contractor, and Designer simultaneously) without providing evidence to show how each role is specifically managed. Over-declaring creates confusion and raises doubts about whether the company understands the scope and limitations of its responsibilities. Evidence must reflect a realistic alignment of declared roles with actual business activities.

#### Selecting multiple duty holder roles but only evidencing one

• In several submissions, companies select more than one applicable duty holder role (for example, Principal Contractor, Principal Designer, Contractor, and Designer), but only provide evidence for the most senior roles such as PC and/or PD. This leaves gaps where no evidence is provided for Contractor and/or Designer responsibilities, meaning the submission does not cover all declared roles. Each role must be supported by role-specific evidence to demonstrate competency and compliance.

#### Using generic documentation from other schemes (e.g., SSIP) instead of Building Safety-specific evidence

Evidence is sometimes copied from other compliance submissions such as SSIP assessments. While such documentation
may be relevant for health and safety management, it does not meet the requirements of the Building Safety Act or
Building Regulations. Building Safety requires explicit reference to building-specific obligations, fire and structural
safety, and competency management. Generic evidence reused from other schemes will be rejected unless it has
been adapted to demonstrate compliance with the Building Safety framework.









# Questions



# HOW TO COMPLETE THE BUILDING SAFETY SECTION





## What questions do I need to answer?

- Take Time to Understand Each Question: Before answering any question, ensure that you fully understand what's being asked. If the language or intent is unclear, it's worth seeking clarification.
- Use the Guidance Provided: Each question likely comes with instructions or guidance that will help you understand what's expected. Be sure to read and follow these carefully to avoid any misunderstandings.
- Review Your Internal Processes: If your organization needs to meet specific requirements, take a close look at your current practices. If necessary, implement changes to ensure compliance with the standards being asked for.

- Prepare Evidence: Evidence is crucial for substantiating your claims. Gather documentation, records, or any other relevant data that demonstrate your organization's compliance with each requirement.
- Seek Support if Needed: Don't hesitate to reach out for help if you find certain requirements difficult to meet or understand. It's better to ask for clarification than to risk submitting incomplete or incorrect information.
  - Don't Rush Submission: Make sure that you're confident in your responses and supporting evidence before submitting anything. As the process might require re-submission if there are gaps, it's safer to submit once you're certain everything is in order.

## FINAL TAKEAWAYS AND KEY POINTS







#### Identify if the Act applies to you:

Carefully review the provisions of the Act to determine whether it applies to your organisation. This is not limited to High-Risk Buildings (HRBs), so, consider all aspects of your operations that might fall under its scope.



#### **Mandatory Deadline:**

Main contractor deadline is the 1<sup>st</sup> October 2025. Get advice on if you are required to submit an answer to this requirement. Ensure you have opted in or out, completed the necessary steps, and are ready to pass the compliance process.

View the Building Safety guidance here



#### **Seek Support:**

If you're unsure about any aspect of compliance, don't hesitate to seek support. This could come from legal advisors, industry experts, or internal teams who are familiar with the Act's implications.



#### **Prepare Your Answers:**

Before submitting any documentation, take the time to thoroughly prepare your responses. Use the provided guidance to work through each question methodically, ensuring accuracy and completeness.

Refer to the detailed guidance to help you navigate the questions and provide well-informed answers. This will help you understand the expectations and requirements of the Act.

