NFRC
Guidance Note (GN69 revision A)

NFRC
LEADING ROOFING EXCELLENCE

Building regulations and the Building Safety Act for domestic clients and roofing contractors

Amendments to *'The Building Regulations etc. (Amendment) (England) Regulations 2023'*[1], which came into force on 1 October 2023, introduced a new Part 2A into the Building Regulations 2010, establishing formal roles and responsibilities for dutyholders, clients, principal designers and principal contractors.

A commercial client must take all reasonable steps to ensure any designer or contractor they appoint is sufficiently competent and can fulfil their duties under Part 2A of the building regulations England—however domestic clients are treated differently from commercial clients under the regulations, recognising that homeowners will not necessarily have the knowledge or experience required to manage construction projects.

Where there is more than one contractor, then either the principal contractor or the principal designer, subject to their agreement with the client, is responsible for making those arrangements for the project.

What is the difference between a commercial client and a domestic client?

- **Commercial Client**—An individual or organisation having building work carried out for them in connection with their profit or not-for-profit business.
- **Domestic Client**—An individual having building work undertaken on their home, or the home of a family member, where the project is not undertaken in the course or furtherance of a business. Examples include replacing a domestic roof, constructing an extension, or undertaking home refurbishment works.

What are building regulations?

Building regulations help to ensure that the construction of new buildings, extensions to an existing building, conversions of an existing building or renovations to a building, either domestic or commercial, are undertaken safely and perform to the requirements stipulated within the supporting approved documents.

What is the Building Safety Act?

The Building Safety Act (BSA 2022) sets out clear lines of responsibility for building owners. At the heart of the act is the legal obligation for all individuals and organisations to be competent to ensure compliance with the Building Regulations in both design and construction. This obligation applies across all sectors from the smallest of residential alterations to the largest most complex development.

The Act includes a special category of client called a ***"domestic client"***, who are treated differently from commercial clients because they are generally considered to be inexpert buyers of design and building services.

Domestic clients have less onerous duties than commercial clients as their role and responsibilities sit with the Principal Designer and Principal Contractor if there is more than one contractor involved. These dutyholders must have the appropriate skills, knowledge, experience, and organisational capability to manage health and safety risks, and design compliance effectively. *(The Principal Contractor may also undertake the work of the Principal Designer as long as they have and can prove their competency).*

Domestic client responsibilities

Regulation 11C provides specific arrangements for the discharge of certain domestic-client duties.

- **Single-contractor projects:** The contractor is responsible for discharging the specified domestic-client duties.
- **Projects involving multiple contractors:** These duties are discharged by the Principal Contractor or, where agreed in writing with the domestic client, the Principal Designer.

Domestic clients must nevertheless cooperate with those involved in the project and provide relevant information about the building and proposed works.

Where the required Principal Designer or Principal Contractor appointments have not been made, Regulation 11C identifies the designer in control of the design phase and the contractor in control of the construction phase as the respective dutyholders.

Single-contractor roofing projects

Where only one contractor is involved in a project, Regulation 11D(6) provides that the contractor is treated as appointed as the Principal Contractor and must fulfil the relevant duties.

Where the roofing contractor also undertakes design work, such as developing or modifying the roof specification, they must fulfil the applicable designer duties.

Undertaking design work does not, by itself, automatically make a contractor the Principal Designer. The applicable arrangements depend on the number of designers involved and the provisions of Regulation 11D.

Contractors must have the necessary skills, knowledge, experience and behaviours, or organisational capability, to undertake their work and discharge their statutory responsibilities.

Domestic clients managing their own projects

Some homeowners choose to manage their own construction or refurbishment projects, appointing and coordinating individual trades rather than employing a main contractor. This does not remove the requirement for appropriate dutyholder arrangements. Where multiple contractors are involved, or reasonably foreseeable, a Principal Designer and Principal Contractor are required.

A homeowner does not automatically assume either role. Where appointments have not been made, the designer and contractor in control of the respective phases assume these statutory responsibilities.

Roofing contractors working alongside other trades

Roofing contractors appointed solely to undertake roofing works do not automatically become responsible for coordinating the wider construction project.

NFRC advises members not to accept Principal Contractor appointments unless they have the necessary competence, authority and control to fulfil the role.

Where a domestic client provides a roof specification

A domestic client may identify particular products, materials or roofing systems they wish to have installed. This does not automatically make the homeowner a designer or Principal Designer under Part 2A. However, roofing contractors retain responsibility for ensuring that the building work they undertake complies with the relevant requirements of the Building Regulations.

Where a contractor prepares, develops or modifies a roofing specification, they may also assume designer duties.

Where a specification has been prepared by another designer, contractors must consider how their work interfaces with the design and other directly related building work, raising any concerns about compliance with the appropriate dutyholders.

Contractors should not proceed with work they know would fail to comply with the relevant requirements simply because the homeowner has requested a particular specification.

Competence requirements

Anyone undertaking building work or design work must have the appropriate competence to fulfil their duties. For individuals, this means the necessary skills, knowledge, experience and behaviours. For organisations, this includes the organisational capability, resources, systems and procedures necessary to discharge their responsibilities.

Competence must be appropriate to the work and statutory role being undertaken. A contractor competent to install a roofing system should not assume that this alone establishes competence to act as Principal Contractor for a wider construction project.

Important considerations

1. *Domestic clients do not automatically become statutory designers by providing roofing specifications or managing their projects.*
2. *The requirement to identify and fulfil the relevant dutyholder responsibilities continues to apply where homeowners appoint individual contractors directly.*
3. *Roofing contractors must comply with the Building Regulations in relation to the building work they undertake, irrespective of who provided the original specification.*
4. *Contractors undertaking design work must fulfil the applicable designer duties and have the necessary competence.*
5. *Where a contractor is undertaking only part of a wider project, they must consider directly related building work and report concerns about compliance to the Principal Contractor.*
6. *Contractors should establish the relevant dutyholder arrangements before undertaking work and should not accept roles beyond their competence or ability to control and coordinate the works.*

Note

This guidance relates to building work in England. The statutory arrangements under the Building Regulations are separate from, although they may overlap with, dutyholder responsibilities under CDM 2015.

Approved Documents

Approved Documents describe how the requirements of Schedule 1 and Regulation 7 of the Building Act 1984 can be met. In essence they explain the requirements of the Building Regulations which buildings in England and Wales must comply.

The list of Approved documents is shown below for England and Wales and the individual or company undertaking, designing or supervising the works should understand the requirements of these Approved Documents dependent on the works being undertaken:

Part A: Structure
Part B: Fire safety
Part C: Contamination and moisture
Part D: Toxic substances
Part E: Passage of sound
Part F: Ventilation
Part G: Sanitation and water
Part H: Drainage and waste disposal
Part J: Combustion appliances and fuel storage systems
Part K: Falling, collision and impact
Part L: Conservation of fuel and power
Part M: Access and use of buildings
Part O: Overheating
Part P: Electrical safety
Part Q: Security
Part R: Electronic communications infrastructure
Part S: Infrastructure for the charging of electric vehicles
Regulation 7: Materials and workmanship

For more information

[1] The Building Regulations etc. (Amendment) (England) Regulations 2023: https://www.legislation.gov.uk/uksi/2023/911/contents/made

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Revision	Date	Changes
A	October 2026	Clarified domestic-client and dutyholder responsibilities under Part 2A of the Building Regulations, including homeowners managing their own projects, the appointment of Principal Designers and Principal Contractors, and the responsibilities of roofing contractors working alongside other trades. Updated guidance on competence and client-provided specifications.
	February 2025	First published.

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