Construction:

35. What types of skills, knowledge and experience are needed to carry out construction work?

Work to establish competence frameworks for roofing disciplines through the ICSG is currently far ahead of most other disciplines. The National Federation of Roofing Contractors, in its role as the leading trade association for the roofing and cladding industry, has contributed extensively to the development of these competence frameworks. NFRC also continually updates its Member businesses with the latest technical knowledge required to complete work compliantly and to a high standard. This takes the form of over 170 continually updated guidance notes, in person technical events in regions across the UK, and on call technical assistance for Member businesses and members of the public. NFRC would be obliged to share this technical expertise directly with MHCLG or the regulator.

36. In your experience, where are the most material gaps in skills, knowledge, and experience in the construction phase?

Roofing is demonstrably one of the most common areas where faults occur during the construction phase for new build residential properties, as demonstrated by data on claims made in years 3-10 of NHBC's insurance policy. From 2021 to 2025, roofing has comprised between 60 and 65% of claims made against the NHBC policy. This is roughly double the second most common claim, claims made relating to the 'Substructure, ground floor, drainage & basements', which comprise ~30%, and more than ten times any other build element. This demonstrates that roofing work is not reliably being completed to appropriate standards on new build housing.

On April 14th 2026, NHBC Head of Standards Richard Smith told the MHCLG Select Committee, "My experience of claims is that predominantly water ingress is the most common claim, especially in years 3 to 10… Water ingress in roofs is our highest claim area, and water ingress through external walls is our second highest. That is in both value and notifications."

For properties covered by NHBC policy, failures on the roof are primarily occurring at Junction/interface detailing – 56% of claims combined in 2025:

- False/dummy chimneys: 22%
- Dormers: 13%
- Projections through roof: 11%

- Abutments: 10%

The above weatherproofing work, where two planes or materials meet is where skill and attention to detail matter most, and where most claims originate.

Material laying/fixing — 28% of claims combined in 2025:

- Underlay and sarking: 10%
- Incorrect laps: 7%
- Inadequate fixings: 6%
- Valley incorrect laps: 5%

These percentages are fairly consistent since 2021 and demonstrate that roofing competence is the most significant material gap when it comes to constructing new homes which their serve occupants fairly.

It's crucial to note that NHBC claims data is historical, with many of these claims identified happening in the 6th and 7th year of the policy, meaning this is not a live representation of the current performance of NFRC roofing and cladding businesses, and there is a significant lag in evaluating the effectiveness of NFRC interventions over the past five years. This is especially important when you consider that NFRC Membership has nearly doubled since August 2019. The above NHBC claims data is a legacy problem NFRC's current work is closing, rather than a live indictment of today's membership. However, this does emphasise the importance of getting it right on the roof space.

The reasons for failure in the roof space are multifaceted. Roofing has historically not been considered a professional trade, or alternatively, a trade that non-specialists can perform without training. The nature of a roof's placement, out of sight with installation issues only making themselves known later when heavy weather hits, has historically made it more difficult to monitor for quality. This is why the work NFRC is undertaking to professionalise the sector, establish infrastructure for standardised competence proof of organisation and individuals, and increase access to technical information, is critical to address material gaps in construction delivery.

Due to a historic lack of professionalism and training in roofing, large gaps in CPD and upskilling opportunities persist in the roofing and cladding industry. There are also critically limited pathways to demonstrate skills which have been gained across decades of experience, but never officially verified. NFRC group, which includes NFRC Competent Person Scheme, is looking to address this with the introduction of a simplified competence management tool for individuals and businesses certifying

works through the scheme. The proposed competence management platform will link a worker's qualifications, health and safety training and career progression directly to the competence requirements of their specific role as outlined in newly published Mandatory Technical Competencies (MTCs). This is happening alongside the introduction of an academy with accessible CPD training for proving existing skill bases. Additional collaboration with NHBC and other industry stakeholders, focused on addressing common roofing issues, is addressing challenges head on.

Additionally, NFRC's position as the authoritative voice for technical excellence in roofing and cladding means that our technical team is best placed to identify common installation issues and address topics head on. From 2022 to 2025, the NFRC technical team handled 2,031 technical inquiries, 1,070 of which were from Member businesses, the rest of which were from members of the public and various other parties.

38. What most influences behaviour and decision-making when carrying out construction work?

Price is the dominant driver of decision making during the construction process. A race to the bottom can often see work awarded to the lowest bidder, who may have cut corners on training and compliance to get there. Otherwise, there is the potential for work to go to businesses that have simply underpriced the job by mistake, which then drives them under, further eroding the stability of the workforce. This pattern holds across public and private sectors and intensifies whenever the market contracts and work becomes scarce, as borne out in our latest state of industry data on tender prices during 2026’s market constriction.

The high cost of employment, combined with a largely transient subcontracted workforce, compounds this by steadily eroding the skills base. Volatile material prices, driven by both global and domestic factors, add further pressure on decision-making at the point of delivery. NFRC's own reforms are designed around this reality rather than against it. NFRC’s direction of travel, especially the establishment of a competence management platform, for example, will be annual and risk-based rather than requiring full reassessment, and its CPD requirement can be met independently by the individual as well as through their employer, reflecting how often the roofing workforce moves between businesses.

These challenges to business are borne out in NFRC's own industry data. In our reports from the past four quarters, 73% of members cited cost of employment as a key

challenge for their business, 54% political uncertainty, 51% recruitment challenges and 50% economic constraints. Regulatory navigation barely registers by comparison. In Winter 2026, only 15% cited the Building Safety Act specifically and 13% cited regulation more broadly as challenges for their business. Whether this reflects a lack of understanding of the requirements of regulations, or a lack of real oversight resulting in compliance falling into the background, is unclear.

A further factor influencing decision making during the construction phase is the limited input contractors get at the pre-design and design stages. Without their expertise built in early, contractors are frequently forced into poor decisions during construction, a problem made worse by price and time pressures, programming issues and late design changes.

40. What benefits are there when individual and organisational roles, responsibilities and accountability are clearly defined, understood and applied during the construction stage?

The clearest benefit is that people know their limits and act accordingly. Clarity draws a line in the sand around competence, so individuals recognise when they are not competent to continue. Otherwise, pressure to complete a job can push individuals and organisations into taking on work they are not competent for.

Clear role and organisational definitions can also resolve ambiguity around liability. This is visible right now in rooftop solar, where roofers are being called back for leaks and other issues they did not cause, because responsibility for solar installations is poorly delineated. That problem will only grow as solar uptake accelerates. The emergence of roles within the rooftop solar industry is a telling example of how individual and organisational roles emerge in the current system.

Current solar PV installation practices (retrofit and new build) present material and growing risks to consumer safety, property value, and value for money. The current risk profile in this emerging market is still poorly understood and risks being compounded by the Warm Homes Plan and incoming Future Homes Standard. Standards, oversight, and cross-trade competence frameworks are not keeping pace.

As a result, consumers are facing increased risk of:

- Fire and electrical safety incidents
- Compromised roof integrity and waterproofing
- Premature roof failure and avoidable remedial costs

- Installations on unsuitable or end-of-life roofs
- Poor workmanship driven by uneven competence requirements and low consumer awareness
- Misleading or predatory sales practices

Without targeted intervention, these gaps risk undermining consumer confidence in rooftop solar and weakening the long-term credibility of the renewables market.

Finally, clarity enables businesses to plan with confidence, building their structure, hiring and training decisions around known requirements, rather than guessing what will be demanded of them. There are sincere concerns amongst contractors at the moment that the current regulatory regime overhaul agenda could be halted or undone by a future government, disadvantaging those businesses who do the right thing and invest in compliance.

41. What challenges are there in defining, understanding or delivering these roles, responsibilities and accountability during the construction stage?

As an emerging discipline with no settled definition of competence or responsibility, solar is currently where challenges in defining roles is most acute.

Enforcement is the underlying issue. The Building Safety Regulator lacks the oversight and resources to enforce standards or pursue prosecutions outside of the HRB market where warranted, which means many roles and responsibilities don't yet feel real or necessary to the workforce on the ground, especially on smaller scale projects. Shifting that culture will take sustained time, investment, and effort.

43. How well do principal contractors generally understand their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

In Q4 2024, NFRC asked Members if they were clear about their responsibilities under the Building Safety Act publishing the results in our State of the Roofing Industry Report Q4 2024. Overall, 56% reported feeling extremely clear (20%) or somewhat clear (36%) about their Building Safety Act responsibilities; 22% were neutral; 18% felt somewhat unclear (14%) or not at all clear (4%); and 5% didn't know. In other words, while most respondents have some grasp of their duties, only one in five felt fully clear on them, a sign that duties are not being met to a satisfactory standard. Worth noting that the survey is now 18 months old. While not directly connected to dutyholder roles, conclusions may still be drawn. Based on NFRC office inspection records,

approximately 45% of NFRC Members work as Principal Contractor or Designer within CDM regulations (majority working exclusively as PC and not undertaking design responsibilities).

When asked to rate the level of support received from the UK government to enable members to update their business practices in line with the BSA, 11% rated it good (9%) or excellent (2%), 43% rated it neutral, and 45% rated it poor (24%) or extremely poor (21%).

Asked what would help most, Members prioritised clearer guidance from the regulator (54%), followed by access to training programmes (45%), more guidance via the NFRC website (43%), and better compliance support tools (37%). NFRC implemented a BSA information hub on our website in 2025 and have also run BSA workshops in a number of regions across England. A quarter (24%) wanted greater direct access to the Building Safety Regulator for queries, 13% wanted peer support networks, 18% were unsure, and 1% cited something else.

Together, these findings indicate that while most contractors have some understanding of the BSA, and dutyholder regime by extension, confidence is far from universal, and there is clear demand for more practical guidance, training and compliance support to close the gap.

46. Does the current system of (a) education and training, (b) competence standards and frameworks, and (c) regulation and oversight effectively incentivise and enable appropriate skills, behaviours, accountability and quality of work at the construction stage?

Please include real-world examples to support your responses, including where you think there are currently material gaps in provision.

- (a) Education and training [Free text response]

Provision is falling short on several fronts. Within roofing and cladding, there are too few CPD opportunities, too few training providers, and limited CITB funding availability and reliability. The transient nature of the workforce, alongside a contracting market, also make it challenging for businesses with narrowing overheads to invest in upskilling new entrants to the industry. Practical barriers compound this (the cost and logistics of travelling to training in some regions) and a largely transient, often non-directly-employed workforce can make consistent training even harder to sustain.

- (b) Competence standards and frameworks [Free text response]

Roofing is ahead of most other disciplines here, with the ICSG developing and finalising competence frameworks for the sector. The gap is not in the frameworks themselves but in implementing and enforcing them. NFRC is addressing this gap directly by implementing a competence management system. This will replace reliance on individual assessor judgement and easily-manipulated photographic/coursework evidence with structured on-site professional discussion, real-time assessment, and established RoofCert knowledge testing, delivered by inspectors trained to TAQA standard. Competence will then be monitored annually on a risk-based footing rather than through periodic full reassessment.

- (c) Regulation and oversight [Free text response]

The problem is not a shortage of regulation or standards. Between the Construction (Design and Management) Regulations, ICSG competence frameworks, trade associations and professional bodies, the Procurement Act 2023, British Standards, the Building Safety Act, and others, the ground is already comprehensively covered. What's missing is the enforcement and oversight capacity needed to make that framework effective in practice.

47. Overall, how effective do you think the current system infrastructure for skills, competence and regulation and oversight is at incentivising and enabling appropriate skills, behaviours, accountability and quality of work in the construction stage?

Not effective

49. Are there particular issues or benefits associated with different approaches to licensing, regulation and registration of contractors and/or subcontractors, including those working on smaller scale or domestic dwellings?

NFRC's position is that a blanket licensing of contractors and/or subcontractors would not the most effective route to improving competence, conduct and accountability in roofing and cladding. The better approach is to enforce existing regulation and

standardise delivery within the accreditation mechanisms that are already delivering results.

Self-regulation is already working: NFRC's 1,200+ members are admitted against clear standards of accountability, conduct and competence, backed by independent inspection of offices and sites, not just paper checks. In 2025, over a quarter of applicants were declined membership. This is a stronger filter than most trade directories apply, and the results are set out in NFRC's inspection records, which demonstrate high compliance (95%+) on a number of important metrics relating to performance, including demonstrating access to manufacturer recommendations, site specific RAMS provided where applicable, safety briefings/inductions/toolbox talks before new works, accident book held.

A model for increasing and accurately measuring individual-level competence is also emerging from NFRC Competent Person Scheme‘s (NFRC CPS) work to implement a competence management platform. While the two are importantly linked, most workmanship failures happen at the level of the individual installer, not the organisation. NFRC CPS, which allows contractors to self-certify compliance with building regulations, is in the process of introducing a competence management platform to verify individual competence through assessment, site inspection and CPD. NFRC CPS inspectors conducting these assessments will be trained to TAQA standard (Training, Assessment and Quality Assurance). This will let CPS contractors identify and maintain a Nominated Competent Person against Mandatory Technical Competence (MTC) requirements in line with revised conditions of authorisation for competent person schemes. This will establish the infrastructure for any roofing and cladding contractor, not just NFRC CPS members, to evidence competence under the Building Safety Act, representing the addressing of a critical gap in the market. Roofing and cladding is ahead of most other construction industries on this. The long-term goal is a roofing and cladding competence mark that main contractors and employers can rely on industry-wide. Combined with the Common Assessment Standard, which already streamlines pre-qualification on larger projects, this is steadily raising standards at both ends of the market.

The real challenge for licensing, regulation and registration is inconsistent enforcement of what already exists. It’s essential for any new framework in the profession strategy to build on the work already underway, not duplicate it, while also actually enforcing current regulation.

- The Construction (Design and Management) Regulations 2015 set out clearly how work should be delivered safely, but are not enforced.
- Building regulations set minimum standards for safety, health, energy efficiency and access compliance, but enforcement is inconsistent. For notifiable

domestic building work in England and Wales, there are two compliance routes: Competent Person Scheme (CPS) and Building Control. From July 2026, CPS installers must meet national Mandatory Technical Competence (MTC) requirements, with all registered contractors assessed by mid-2028. The Building Control route imposes no equivalent competence requirement, a double standard that is invisible to the clients relying on it. Building control departments are not equipped to ensure compliance with work requiring specialised contractors.

Standardising trade/professional body requirements for construction contractors while embedding their value into consumer/client awareness will be one of the most cost-effective pathways to increasing value for money for homeowners and occupiers. The real barrier to relying on trade associations and professional bodies is that membership requirements can vary between them. Government could set minimum standards for how these bodies admit businesses, including independent complaints procedures, business insurance requirements on members, and stringent competence centric inspection regimes, to ensure consistency. This could be audited in the same way as TrustMark scheme providers or UKAS, rather than creating a new government licensing body. This is more achievable and puts delivery in industry's hands.

Some NFRC members do support licensing, particularly in the domestic RMI market, where compliant contractors regularly lose work to those undercutting on training and quality assurance. The current landscape is difficult to navigate, and this uncertainty puts homeowners off getting work done at all. Trade associations, with small marketing budgets, cannot compete for visibility against large trade-checker sites/directories that list every discipline but inspect and assure none. Homeowners searching online are funnelled to these sites, which use language that makes genuine quality markers hard to distinguish. This reinforces the case for standardising and promoting trusted schemes, rather than adding a new licensing layer on top of a landscape homeowners already struggle to parse.

Whatever principles the Strategy sets for licensing, regulation or registration, they must not add administrative burden to contractors. Many small and micro businesses are already stretched by the current administrative load facing their businesses. Any competence-based licensing must also account for sub-specialisation. The average NFRC member business operates across 5.3 distinct specialisms, reflected in the nine separate roofing supervising-installer MTC pathways, from single-ply membrane to wood shingles. Without due consideration for the variety of highly variable sub-specialisms within trades, competence-based licensing risks requiring an inspection taskforce the sector does not have the workforce to enable.

51. Thinking about the issues raised in your responses to questions 35-50, what practical changes or actions would make the biggest difference to how construction work is carried out?

Main contractors still hold widely variable understandings of competence and their obligations under the building safety regime, and there is no industry-agreed approach to demonstrating it. The definition of competence and what counts as proof of competence continues to shift by job, trade, region, nation and client, leaving businesses to navigate a moving target rather than a consistent standard. Wider uptake and integration of competence frameworks, paired with recognition of the cost to businesses of setting up and continuously delivering training that meets and evidences these standards, is critical. This must be combined with much greater emphasis on enforcement of the regulation that already exists, rather than further regulation-making.

53. What types of skills, knowledge and experience are needed to carry out occupation and maintenance work?

Maintenance work often demands a higher skill level than new build because it requires diagnosing a problem before it can be solved, often in non-standard, site-specific conditions. The retrofit skills space in particular lacks structure to support this, a gap set out comprehensively in the CITB-commissioned research for the RMI Sector Skills Plan, *'Energy Retrofit, Repair, Maintenance and Improvement of Homes in Great Britain: Towards a Sector Skills Strategy'*.

54. In your experience, where are the most material gaps in skills, knowledge, and experience in the occupation and maintenance phase?

NFRC's triennial site inspection data shows strong SKEB and compliance performance across NFRC businesses overall, but a clear gap is present between new build and re-roofing (occupation and maintenance) work.

Basic site controls and safety are consistently strong: compliance exceeded 97% for site tidiness, waste disposal, hazardous waste management, fall-prevention provision and PPE use across both new build and re-roof inspections, and party wall protection was managed well in both settings (100% on new build, 94.7% on re-roof).

Gaps emerge in consistent application of manufacturer requirements, workmanship standards and fire-related arrangements, and lower levels of success are concentrated

in re-roofing/maintenance work. Compliance with manufacturer recommendations fell to 88.0% on re-roof work against 95.3% on new build, pointing to a knowledge or process gap in aligning installation methods with product specifications. Re-roof inspections also showed lower compliance on suitable fire arrangements (88.5%) and on the use of adequate materials applied in a workmanlike manner (91.4%). Taken together, this indicates the occupation and maintenance phase needs greater focus on ensuring installers understand and consistently apply product requirements, correct working methods and fire safety considerations when carrying out remedial or replacement work. These gaps are more common in the maintenance market because private homeowners or occupiers are typically less likely to have the competence required to identify problems than a well-resourced principal contractor is on a new build development.

External evidence reinforces the gaps we've identified. Citizens Advice's July 2026 report, *Built to fail: How the home repairs market is failing consumers*, found that external walls and roofing was the third most common issue among those reporting a problem with home improvement works in the past 18 months (31%), behind only room installation/renovation (32%), a category that itself includes loft extensions where roof issues are common. By project type, energy efficiency upgrades were the most problematic (46%), a category that includes retrofit solar. Rooftop solar in the retrofit market is a key safety and compliance concern for NFRC with the influx of non-roofing operatives (solar installers or electricians) flooding the market, resulting in solar fires rising at twice the rate of installations in 2025 and rapidly increasing frequency of water ingress issues which completely negate energy efficiency benefits for a home.

Citizens Advice's own complaints data for England in 2025 tells a similar story. The category ‘roofing, roof sealing and chimney repairs’ was the single largest category, accounting for almost one in five (7,854 of 39,863, ~20%) home improvement and maintenance complaints that year, over 80% more than the next largest category, major renovations. By contrast, complaints made against NFRC Members through our formal complaints process over the same period were a fraction of this figure, demonstrating the effectiveness of our mechanisms both in raising member standards and in holding members accountable when complaints do arise. NFRC is currently working to make its complaints process fully independent of the trade association to strengthen its impartiality and public credibility further. Unfortunately, Members of the public who think they are protected, frequently contact the NFRC but if the company is not a member of the trade association, we have no recourse to action.

59. What challenges are there in defining, understanding or delivering these roles, responsibilities and accountability during the occupation and maintenance stage?

Business size is a key constraint in the retrofit market. Smaller businesses, which complete the majority of works, have significantly less capacity to engage with understanding and executing their exact responsibilities and accountabilities at this stage of a building's lifecycle. Within NFRC's Competent Person Scheme membership, quality assurance is concentrated at the top of the business. 77.6% of NFRC CPS inspections found that quality assurance sits with the Director/MD/Owner/Partner, and in 62.57% of cases it is carried out personally by the business owner or most senior executive. This concentration creates challenges for smaller firms to build out the broader organisational understanding of roles and accountability the building safety regime assumes.

65. Overall, how effective do you think the current system infrastructure for skills, competence and regulation and oversight is at incentivising and enabling appropriate skills, behaviours, accountability and quality of work in the occupation and maintenance stage?

There are two routes to compliance for notifiable domestic building work in England and Wales: the Competent Person Scheme (CPS) route and the Building Control route. From July 2026, installers self-certifying through a Competent Person Scheme must be assessed against national Mandatory Technical Competence (MTC) standards. All registered contractors must be assessed by mid-2028. However, the Building Control route does not impose an equivalent competence requirement on installers.

Route 1: Competent Person Scheme – competence-based

The Competent Person Scheme provides assurance over both the installer and the work.

- Installers must demonstrate competence before joining a scheme.
- All contractors must undergo MTC assessment by mid-2028.
- Businesses are subject to independent office and site audits.
- Audits are UKAS-assured.
- Installers are subject to ongoing surveillance, random monitoring, CPD requirements and five-year revalidation.
- The work is self-certified by the competence-assessed installer.
- There is no building control fee for the homeowner because the work is notified through the scheme.

- An insurance-backed guarantee is included with certification.

Route 2: Building Control – inspection-based

The Building Control route provides assurance primarily through inspection of the work.

- There is no equivalent requirement for the installer to demonstrate competence.
- The installer is not subject to equivalent independent business audits.
- There is no prescribed ongoing surveillance or revalidation requirement.
- Building control checks the work at selected stages rather than assessing the competence of the installer.
- Homeowners typically pay a building control fee, which can range from approximately £250 to £1,200 or more, depending on the local authority.
- An insurance-backed guarantee is not typically included.

For an illustrative roof replacement costing approximately £9,500:

- CPS contractor: £9,500 quote + £0 building control fee = £9,500
- Non-scheme contractor: £9,300 quote + approximately £480 building control fee = approximately £9,780

The apparent saving from using a non-scheme contractor therefore narrows or disappears once the building control charge is included. The homeowner also receives less assurance about the contractor's competence and does not typically receive an included guarantee. The 2026 reforms have strengthened the competence requirements for those checking notifiable work through both routes. However, only the Competent Person Scheme route verifies the competence of the businesses carrying out the work. This creates an asymmetry between the two routes. Businesses that choose to operate through a Competent Person Scheme are subject to independent competence assessment, auditing and ongoing monitoring. The alternative Building Control route remains open to installers without equivalent competence assessment.

The result is that the Competent Person Scheme provides assurance about both the competence of the installer and the quality of the work, while the Building Control route primarily provides assurance through inspection of the work itself.

73. What role do existing sector bodies and regulators play in supporting and assuring individuals' skills, knowledge, experience, behaviours and accountability and organisational capability?

Please provide specific details, as appropriate. You may wish to consider how effective is current provision and whether there are gaps in current leadership and oversight.

The ICSG has developed competence frameworks for roofing disciplines that are already far ahead of most other construction trades. NFRC, as the leading trade association for roofing and cladding, has contributed extensively to this work and is now implementing it directly through its Competent Person Scheme. NFRC CPS is introducing a competence management platform linking individual workers' qualifications, health and safety training and career progression to Mandatory Technical Competencies for their specific role. From July 2026, CPS installers must meet these MTC requirements, with all registered contractors assessed by mid-2028. Assessment will be carried out by inspectors trained to TAQA standard, using structured on-site professional discussion, real-time assessment and established RoofCert knowledge testing, replacing reliance on individual assessor judgement and easily-manipulated paper evidence. Competence will be monitored annually on a risk-based footing with a focus on CPD which is currently lacking for many roles across construction.

At organisational level, NFRC provides assurance through admission standards and independent inspection, not paper checks alone. Over a quarter of applicants were declined membership in 2025, and inspection records show compliance exceeding 95% on core metrics such as access to manufacturer recommendations, site-specific RAMS, safety briefings and induction records. NFRC also supports the sector directly through more than 170 continually updated guidance notes, in-person technical events, and on-call technical assistance, handling over 2,000 technical enquiries between 2022 and 2025.

NFRC's complaints process provides a further layer of accountability. Complaints against NFRC Members are a small fraction of the volume seen in Citizens Advice's national data for the "roofing, roof sealing and chimney repairs" category, which was the single largest home improvement complaint category in England in 2025. NFRC is currently working to make this complaints process fully independent of the trade association to strengthen its impartiality. Where a business is not an NFRC Member, the organisation has no route to act on a complaint made against it. Despite this, many members of the public regularly approach us for help with contractors and we are unable to provide this.

By contrast, the Building Control route to compliance imposes no equivalent competence requirement on installers, no independent business audits, and no prescribed ongoing surveillance or revalidation. It assures the work through inspection at selected stages rather than assuring the competence of the person or business carrying it out. This creates an asymmetry between the two compliance routes for the same notifiable work.

The statutory regulator is a weaker link than the sector bodies. The Building Safety Regulator lacks the oversight and resources to enforce standards or pursue prosecutions outside the Higher-Risk Building market, which means roles and responsibilities established in frameworks and schemes often don't translate into consequences on the ground, particularly on smaller projects. While BSR chair Andy Roe has said they will be looking “very, very closely at the way you (main contractors) manage your subcontractors and the level of quality,” it’s unclear how this will actually be executed, especially considering the resourcing difficulties the BSR has faced.

The result is a sector where standards and assurance mechanisms exist and are being actively strengthened by trade bodies, but where enforcement of those standards, and of existing regulation more broadly, by central and local government remains the binding constraint. The call for evidence rightly identifies limitations in the sanctions trade associations can apply. However, those sanctions carry more weight the stronger the commercial case for a business to hold trade association membership in order to operate successfully, which government can influence directly, either through it’s own procurement practices, or the way it communicates with the general public.