



NFCC
National Fire
Chiefs Council

The professional voice of the
UK Fire & Rescue Service

National Fire Chiefs Council
West Midlands Fire Service
99 Vauxhall Road
Birmingham
B7 4HW

Telephone +44 (0)121 380 7311
Email info@nationalfirechiefs.org.uk

Sent to: BuildingSafety@hse.gov.uk

16 June 2023

Consultation on HSE's information document that highlights the necessary competency for the new principal designer and principal contractor roles

The National Fire Chiefs Council (NFCC) is pleased to respond to the consultation published on 30 January 2023 *Building safety competence information for principal contractors and principal designers*.

NFCC is the professional voice of the UK fire and rescue services (FRSs) and is comprised of a council of UK Chief Fire Officers. This response was put together by NFCC's Protection Reform Unit (PRU).

This response was drafted in consultation with our members across the FRSs and reflects their expertise and competence on the subject matter.

General Comments

NFCC is pleased to be answering this consultation and supports the principle of providing simpler guidance for all stakeholders on the competence standards of principal designers and principal contractors. However, we have some concerns.

NFCC believes that if PAS 8671 and PAS 8672 will not be referenced by stakeholders then key competence features may be lost as the detail is not available in the HSE guidance. The simplified guidance will need to contain sufficient clear directives to refer to the PAS to limit the likelihood of this occurring. NFCC believes that the competence criteria for higher risk buildings should be listed in *Principal Designer - Summary of PAS 8671 competence* and *Principal Contractor - Summary of PAS 8672 competence*.

Including competence criteria for higher risk buildings in the summary for Principal Designers and Principal Contractors is crucial for project safety and effectiveness. NFCC believes that adjusting the existing PAS to incorporate the necessary competence and organisational criteria for organisations that commonly hold these roles will ensure comprehensive coverage and meet the requirements for organisations undertaking these critical positions.

Due to the growing trend of organisations taking on the roles of Principal Contractor and Principal Designer, it is necessary to modify the existing PAS to accommodate this change. This modification should include the competence and organisational criteria necessary for

organisations to effectively assume these roles. By doing so, the comprehensive PAS will provide clear guidance to organisations and help them comply with their competency duties.

NFCC believes that addressing these concerns will enhance accessibility and ensure that all important aspects of competence and organisational requirements are covered. We look forward to collaborating with HSE colleagues to discuss these matters and ensure any new guidance is fit for purpose.

Yours sincerely,

A handwritten signature in black ink that reads "N. Coombe". The signature is written in a cursive style with a small mark at the end.

Nick Coombe
Head of Protection
Protection Reform Unit

Organisational Information

Q1: Are you responding on behalf of an organisation?

Yes

Q2: Please tell us your name.

Nick Coombe

Q3: Please give us your email address.

PPRUAdminTeam@nfcc.org.uk

Q4: Do you wish for your details to be available to be public?

Yes

Q5: As part of this consultation HSE may want to contact you again to clarify or get further information on the responses you provide. Are you happy for HSE to contact you?

Yes

Q6: Please select the region you work in

Other – The NFCC is a UK-wide organisation, and our members include Chief Fire Officers and other senior members from fire and rescue services across England, Wales, Scotland, and Northern Ireland

Q7: Please select the size of your organisation

100-249

Q8: Which category best describes you or the organisation you represent?

Professional body

Questions

Question 1

The PAS competency standards are detailed documents that serve many audiences (clients, those taking on PD and PC roles, training providers and scheme authors). As some users (particularly SMEs audiences) may find it difficult to navigate the PAS detail, the BSR has designed its document to be an easily accessible summary of the key PD and PC messages.

Sub-question 1

Do you agree this information is best presented as a focused key messages and a summary of the PAS standards?

Partly

If NO or PARTLY, add additional areas the guidance should cover.

NFCC acknowledges the importance of offering straightforward guidance to all stakeholders regarding the competence standards of principal designers and principal contractors. However, the NFCC has concerns regarding the potential lack of reference to PAS 8671 and PAS 8672 by stakeholders. This absence of reference could result in the loss of key competence features since the detailed information is not available in the HSE guidance.

NFCC believe that the simplified guidance will need to include clear directives that explicitly refer to the PAS so the likelihood of key competence features being overlooked can be minimised. We emphasise the need for sufficient and explicit directives in the simplified guidance to ensure that stakeholders are aware of and utilise the PAS as a crucial resource.

Sub-question 2

Are there any areas missing from the PD / PC key messages and PAS summary?

Partly

If NO or PARTLY, add additional areas the guidance should cover.

Principal Designer - Summary of PAS 8671 Competence:

NFCC believes that this document should include the competence criteria for higher risk buildings. The current link to the PAS also redirects to a gateway page which then requires more information adding before you can access the main document. It would be best to remove such barriers and allow a direct link. The current set up provides another reason for the reader not to look at the actual PAS and rely on this heavily summarised version. Given that this is a free document, there seems to be no justifiable reason as to why the reader has to provide any personal details other than the BSI collecting potential marketing/commercial information.

Principal Contractor - Summary of PAS 8672 Competence:

NFCC believes that this document should include the competence criteria for higher risk buildings. The current link to the PAS also redirects to a gateway page which then requires more information adding before you can access the main document. It would be best to remove such barriers and allow a direct link. The current set up provides another reason for the reader not to look at the actual PAS and rely on this heavily summarised version. Given that this is a free document, there seems to be no justifiable reason as to why the reader has to provide any personal details other than the BSI collecting potential marketing/commercial information.

Organisations:

NFCC suggests that if the positions of principal contractor and principal designer are more commonly held by organisations rather than individuals, the existing PAS should be adjusted to encompass the competence and organisational criteria necessary for organisations to assume these critical roles. This modification would ensure the availability of a comprehensive PAS that covers these positions.

Question 2

Competence can be achieved and acquired in lots of different ways. It is anticipated that professional bodies, trade associations and training providers will be providing different courses and means to verify existing competence in conjunction with awarding bodies and others. There are likely to be multiple routes to acquire and demonstrate competence depending upon competency gaps, requirements for a given project and choice in the marketplace. On this basis, the document does not seek to set out these multiple potential pathways, but instead highlight the key elements that should be considered when increasing competence.

Sub-question 1

Do you agree that the information for PDs and PCs should set out the broad principles for acquiring competence?

Partly

Principal Designer - Summary of PAS 8671 competence

NFCC believes that this document should include the competence criteria for higher risk buildings. It is important that all the key concepts are included otherwise the document loses its validity and becomes little more than a signposting exercise.

Principal Contractor - Summary of PAS 8672 competence

NFCC believes that this document should include the competence criteria for higher risk buildings. It is important that all the key concepts are included otherwise the document loses its validity and becomes little more than a signposting exercise.

Question 3

Although the PAS standards have been written for the competence of individuals, it is recognised that many (the majority) of those taking on the PC and PD role will be organisations. As well as individual competence (including the designated individual), the document also references existing HSE guidance to help organisations implement the necessary “organisational capability”.

Sub-question 1

Do you agree that the information for PDs and PCs should signpost organisation to help them comply with their competency duties?

Partly

NFCC believes that if the positions of principal contractor and principal designer are more commonly held by organisations rather than individuals, it is important to modify the existing PAS. This modification should include the necessary competence and organisational criteria for organisations to effectively undertake these critical roles. By doing so, a comprehensive PAS can be established that adequately covers the requirements for these positions.