



**NFCC**  
National Fire  
Chiefs Council

The professional voice of the  
UK Fire & Rescue Service

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Sent via email to: [susan.revell@bsigroup.com](mailto:susan.revell@bsigroup.com)

14<sup>th</sup> September 2021

**Re: PAS 8673 Built environment – Framework for competence of individual Building Safety Managers and nominated individual Building Safety Managers – Specification**

Dear Susan

To: British Standards Institution

The National Fire Chiefs Council (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 Policy and Reform Unit (PPRU) following consultation across UK FRSs.

NFCC is pleased to respond to the consultation for PAS 8673 *Built environment – Framework for competence of individual Building Safety Managers and nominated individual Building Safety Managers – Specification*.

NFCC welcome the creation of PAS 8673 as a key document which will assist in driving improvements in competence standards in the built environment industry. It will also support the introduction of the new building safety regime under the Building Safety Regulator. The PAS is comprehensive in its approach and follows the guidance given in *BSI Flex 8670 Built environment – Overarching framework for competence of individuals* specification.

NFCC are also pleased to note that PAS 8673 does not limit the role of a Building Safety Manager to higher risk buildings as the word 'building' refers to any property where Building Safety Manager duties are to be utilised. This is important as it does not reinforce a dual standard safety regime where occupants living in buildings falling under the new legislation have greater oversight of fire safety provisions than those who live in buildings not governed by the Building Safety Act.

As with many sectors falling under the auspices of the new building safety regime, the challenge will be in the delivery of individuals who meet the specified competence criteria. Indeed, it is likely that the role of the Building Safety Manager will need to be held within an organisation due to the wide-ranging competence criteria laid down in this document. The publication of this PAS will be the first stage in developing individual and organisation Building

Safety Managers who can perform this new role. Further work will need to be carried out on how an organisational approach will work in practice and also on the recruitment, training and independent verification of Building Safety Manager competence.

We trust the attached submission is helpful and welcome further discussions following the outcome of the consultation.

Yours sincerely,

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Deputy Head of Protection Policy and Reform Unit