

Chartered Institute of Building – Submission to the Construction Products Reform Green Paper 2025

May 2025

Introduction

The Chartered Institute of Building (CIOB) is the world's largest and most influential professional body for construction management and leadership.

We have a Royal Charter to promote the science and practice of building and construction for the benefit of society, and we have been doing that since 1834. Our members work worldwide in the development, conservation and improvement of the built environment. We accredit university degrees, educational courses and training. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

We welcome the opportunity to respond to the Ministry of Housing, Communities & Local Government's (MHCLG) consultation on reforms to construction products regulatory environment through the [Construction Products Reform Green Paper 2025](#).

Competency within the construction industry

Whilst we understand that many aspects of this consultation will affect the way that our members operate, we have chosen to focus our response on elements relating to industry competency.

CIOB has consistently advocated for a construction sector that focuses on ensuring that those operating in the industry are equipped with the competencies necessary to create safe, secure and high-quality environments for users and operators. The same can be said in relation to the use of construction products.

There is an overarching need to ensure that those responsible for the certification, use and installation of construction products understand the implications of their work and have undertaken training and qualifications that prove that they can complete their work to the highest standards available.

This consultation covers many areas relating to the specification and environmental impact of construction products. For expert views on these areas, we recommend consulting with the Construction Products Association (CPA) and Institute of Environmental Management and Assessment (IEMA) respectively.

Question 11. What types of requirements could be placed on those responsible for building works to enable them to meet safety obligations in relation to the specification, selection and installation of construction products?

CIOB is not best placed to comment on the exact requirements that should be placed on those responsible for building works, however, we are keen to ensure that requirements are in place to ensure competency across a range of roles relating to construction products.

For instance, mandatory training should be required for those who are undertaking the testing and certification of construction products as ultimately these are the actors who are allowing products to be placed on the market for general use. In the same vein, training should be necessary for those who are marketing and selling the products to ensure that claims made are as accurate and representative of the specification and use of the product as possible.

However, where we are concerned within this question, is in relation to additional requirements for those who install construction products. Ultimately, not enough detail is provided here to understand the intention for installers and to provide adequate feedback that may help guide future requirements.

Whilst we do not disagree that those responsible for selecting and installing products should be equipped with the mandatory training necessary to ensure those products are safe to use and installed safely, we do have concerns about the implementation of any future requirements, how the scope of those responsible is defined and how any new system requiring competency will be policed.

On the implementation of future requirements lessons must be learned from the application of new requirements in the Building Safety Act 2022.

Since the Act gained Royal Assent in April 2022 there has been much confusion over the roles and responsibilities defined within, particularly in reference to the Principal Contractor (PC) and Principal Designer (PD) roles. This cannot be the case if new requirements are put in place for those handling construction products. With the potential size of the workforce that would fall under the new responsibilities, any delay or confusion in training or certification requirements could have a detrimental impact on the industry and its ability to deliver new homes and infrastructure. There must also be consistency in how new requirements are provided. If it is the case that all construction workers who install construction products are required to undertake additional training, this process must be standardised as much as possible so that the widest range of workers are equipped with the same skills, rather than different versions of the same principals provided by different trainers. This is why we believe it is important to follow the 'Skills, Knowledge, Experience, and Behaviours' (SKEB) model where possible which is being used to define and assess competence in building safety, particularly with the Building Safety Act 2022.

As outlined above, if the scope of those required to undertake additional training remains as is, this could essentially be understood to include most on-site workers. Whilst certain construction products (i.e. external wall cladding) have specific installer roles, many construction products are installed by those with general skills in construction, making it hard to understand exactly how many people will be required to undertake additional training. If it is the intention for these new requirements to be as far reaching as possible it must be acknowledged that the scale of the challenge in upskilling all site workers will be immense. If this is not the intention then the definition of "those responsible for specifying, selecting and installing construction products" should be set out as clearly as possible to avoid confusion.

We understand that the principle of this question is to understand what more can be done to upskill those who procure, select and install construction products, however, without an initial scope of what is meant here, this question risks becoming a generic statement that all installers should be upskilled without the acknowledgement that any approach should be risk-based and proportionate to the risks associated with different construction products.

It should also be set out in more detail how new requirements will be enforced, who will be responsible for providing training to the industry (private sector or professional bodies?) and is there a timeframe the Government has in mind? Further detail and consultation are required here to provide a full answer.

Q19. How is industry addressing gaps in construction product installation competence? And Q20. What more can be done to support the improvement of competence in the construction products industry?

In 2021, the UK Government commissioned Paul Morrell OBE and Anneliese Day KC to undertake an independent review of the construction product testing regime. The [resulting report](#), published in 2023, highlighted the need to ensure that those partaking and executing key steps within a reformed products regime were equipped with the necessary competencies. The report stated that “No process will lead on to success unless every step is executed with the necessary level of competence; and the evidence is that only a small proportion of problems occurring on construction projects are attributable to defective products, as opposed to the way they are used and installed”.¹

The report acknowledged that, since the [2018 review](#) by Dame Judith Hackitt DBE into building regulations and fire safety, progress has been made towards defining competence within the construction industry through the Industry Competence Steering Group (ISG). It also acknowledged that there was a “growing series of accredited competencies for those engaged both in product manufacture, in work on site and in design and supervisory services.”²

CIOB agrees that the industry has come together since the release of the Hackitt review to implement new standards and qualifications for a range of construction professions. This includes for those working directly with construction products. As an example, CIOB, alongside the Royal Institution of British Architects (RIBA), published [a guide](#) to managing safety-critical elements in building construction, those elements which, if they fail, are omitted, or incorrectly installed, carry an unacceptable risk of causing serious injury or fatality.

This is just one example of the key work going on within the industry to highlight the importance of competence in roles or with individuals who manage or install key construction products. It is worth noting that a follow up guide to managing safety-critical products will be released later this year.

CIOB has always advocated for quality over quantity when it comes to building new homes in the UK. We are pleased to see the emphasis the Government has placed on ensuring there is a sufficiently skilled pipeline of new workers entering the construction industry. However, equally important, is to ensure existing workers are equipped with the necessary skills and they have access to adequate, certified training courses to upskill their work and keep up to date with evolving standards and practices.

As the accompanying consultation documentation highlights “safe installation is key to achieving government’s ambition that all buildings are secure for those that live and work in them.” Whilst great progress has been made towards achieving this, not enough professionals within the construction industry are gaining the necessary accreditation or training for those in supervisory roles to be assured that they are qualified.

In terms of what more can be done to support the improvement of competence in the construction products industry, we recommend that Government make use of existing resources (training courses, qualifications, technical guides) produced by organisations like CIOB, the Construction Products Association (CPA) and other trade and professional bodies. A lot of the work has already been done to improve competence, the industry just needs a push from Government to ensure this work is translated into results. Mandating certain qualifications and training courses would be a great step towards helping the wider industry gain competency.

We have also received feedback from our members that indicates that more can be done to support the improvement of competencies by providing clearer guidance on responsibilities. This is particularly the case when it comes to roles and responsibilities defined under the Building

¹ Paul Morrell OBE and Anneliese Day KC, [Testing for a Safer Future: An Independent Review of the Construction Products Testing Regime](#), April 2023

² Paul Morrell OBE and Anneliese Day KC, [Testing for a Safer Future: An Independent Review of the Construction Products Testing Regime](#), April 2023

Safety Act 2022. To drive competency forwards the industry needs a thorough understanding of what is required of it. The example that has been provided is that of the Golden Thread, a key tool within the Building Safety Act 2022 to create a single source of digital truth for all higher-risk building projects. At present there is a lack of understanding of how the golden thread will operate, who is responsible for updating and uploading information to the golden thread and what kind of information is required to be stored. We understand that guidance has been released on these matters, however, this seems to not have translated to an industry understanding of the requirements as a result of a lack of clarity. Therefore, it would be advisable that Government seeks to understand where guidance that has been released has not been adequately understood or is not clear enough for those in the industry to which it applies.

Q34. Should mandatory standards be free to access? [Yes/No]. If yes, please provide suggestions on how this could be achieved, including funding.

Whilst it would be beneficial for those who act in roles where mandatory standards are required as part of their work to have free access to those standards, consideration must be given to the impact this will have on the British Standards Institution's (BSI) ability to generate new standards.

As outlined in the accompanying consultation document, the BSI primarily generates funding for new standards and other costs through up-front charges for accessing the standards and through sponsorship. Taking away one of the primary funding mechanisms for the BSI could significantly hamper their ability to generate crucial future standards. It would also likely require the BSI to funnel financial resources away from other aspects of the business, including resources, advertisement and awareness raising.

Whilst we are not opposed to making mandatory standards free to access, the points above need careful consideration. One way to mitigate the shortfall in financing created by this proposal could be for the government to itself sponsor all future mandatory standards to ensure that these can be generate without adverse effect on the BSI.

Other Areas

Whilst much of our feedback on this consultation relates to competency, we are keen to note concern from Paul Morrell on the proposed reforms within this consultation.

We note that in an [article in Construction News](#), Paul Morrell has outlined some of the following concerns:

- The proposed reforms rely to heavily on increased safety requirements in the future reform of the European Union (EU) Construction Products Regulations which may take significant time to come to fruition. Leaving unsafe products in the UK market for extended periods of time.
- Whilst there are pros and cons for diverging from the EU product testing regime, non-divergence leaves us with little control over operation and oversight of the assessment process where it is conducted in the EU. The consultation should focus more on developing an overarching strategy to "protect against the risks" of continuing to recognise EU product marking.
- The lack of a mechanism to respond quickly in instances that highlight inherent problems with a product on the market where it relates to a failing in the standards available.³

CIOB does not have the necessary expertise to comment on the validity of Mr Morrell's concerns. However, given the importance that has been placed on the independent review undertaken into

³ Construction News, [Construction Products Reform Green Paper: meeting the standard?](#), 7 April 2025

construction products, we urge the Government to consult with Mr Morrell further on these views.

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