

Chartered Institute of Building (CIOB) – Submission to the Single Construction Regulator Prospectus

20 March 2026

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.

Raising Competence in the Construction Industry

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.

We understand that the proposed role of the future single construction regulator sits alongside a suite of reforms to the construction industry including improvements to the current Building Safety Regulator (BSR), a broader reform to the construction products regime as well as oversight of the various professional bodies currently operating in our industry.

It is worth noting that CIOB strongly supports the intentions of the regulator, as outlined in our response to the Grenfell Tower Phase Two Report which can be found [here](#).

At the time, we stated:

“CIOB is supportive of drawing together the functions listed above into a single regulator for the construction industry. However, we acknowledge the difficult task ahead. The construction sector is fragmented into many sectors and sub-sectors all carrying out varied and important work. It is therefore essential that enough time is given to ensure any future regulator has the correct remit and responsibilities to carry out its functions effectively. Its scope will also need to be tightly defined and set out in clear supporting documentation to ensure it does not cause undue confusion within an industry that is already adapting to the new regulatory regime set out in the Building Safety Act 2022.”

Therefore, we were pleased to see the publication of this prospectus and welcome further opportunities to assist in forming the future of regulation in the construction sector through the call for evidence anticipated in spring 2026.

CIOB's work in improving building safety and raising competence dates back to February 2017, where Professor John Cole CBE published a report into the defects that led to the closure of 17 schools in Edinburgh. Just a few months later, in June 2017, the tragic fire at Grenfell Tower claimed the lives of 72 people.

Both incidents were followed by official inquiries, and their subsequent reports rightly made for uncomfortable reading for all those in the industry.

CIOB has been active in driving building safety reform, particularly following the draft publication of the Building Safety Bill – which became the Building Safety Act 2022 on 28 April 2022 and then came into force on 1 October 2023.

Whilst we recognise that competence goes beyond quality in relation to building safety, we feel the work that CIOB has done in upskilling its membership as a response to the tragic events that occurred at Grenfell Tower provides a good understanding of the work we have done to help provide competence in the construction industry.

In recent years, CIOB has developed an extensive learning and assessment portfolio, recognising the need for quality and safety to be enshrined as part of the culture change that Dame Judith Hackitt DBE and others have discussed extensively since the Grenfell Tower tragedy.

The full portfolio of resources is extensive and can be provided upon request. A snapshot includes:

- Codes of practice including editions dedicated to project and programme management.
- Guides include our Guide to Construction Quality, Guide to Products Critical to Safe Construction and Guide to Managing Safety-Critical Elements in Building Construction.
- Information Sheets including on quality planning in micro and small to medium sized enterprises.
- Numerous qualifications including fire safety, site management, site supervision, building control surveying, amongst others.
- Training courses on a variety of subjects including construction quality management, health and safety awareness and the Building Safety Act 2022.

As the Department well knows, demonstrating competency is now a legal requirement for the new dutyholder roles of the Building Safety Act and CIOB has carried out further work in this space.

The principal contractor competence framework

[PAS 8672:2022 - The framework for competence of individual Principal Contractors](#) was published on July 31, 2022. It is part of set of standards, developed by three steering groups, made up of built environment professionals, including CIOB, under the government-funded Built Environment Competence programme and as such is freely available for download.

The PAS 8672:2022 standard specifies competence requirements for the duty holder role of principal contractor. It also describes specific competences common to all principal contractors and those which are additional for those undertaking the role on higher-risk buildings (HRBs). It covers roles and responsibilities; skills, knowledge and experience; behaviours and ethics; additional competences for higher-risk buildings; and limits of competence.

In March 2024, CIOB launched the [Principal Contractor Competency Certification Scheme \(PCCCS\)](#) to provide a route to proving competency as a **Principal Contractor**, as required by the BSR. The regulatory transformation introduced with the establishment of the BSR includes the creation of new safety-critical roles, including the Principal Designer and Principal Contractor, both with building safety responsibilities.

CIOB is will also formally launch a Principal Designer Competency Certification Scheme (PDCCS) later this year.

As part of CIOB's commitment to promoting modern professionalism within the built environment, we have made building safety an integral part of our members' Continuous Professional Development (CPD).

This change, which was made on 1 January 2025, means all CIOB members are required to undertake CPD in Building Safety, to remain up to date with the latest developments and regional regulations. This must represent a minimum of three CPD points, out of the 10 CPD points members are required to accrue each year.

The move follows the introduction of the new CPD Policy in January 2023. Under the policy, CIOB can prioritise certain subjects for CPD to ensure members stay up to date with current best practice. CIOB's CPD Policy is more than just a points-based auditing process and emphasises the importance of reflecting on the lessons and learnings of CPD.

Consultation Questions

CIOB is a member of the Construction Industry Council (CIC) and participates in several working groups whose activities relate to guiding the formation of the single construction regulator.

We actively support the broad intentions for the future regulator set out in the CIC's Exceeding Expectations External Summary Document.

While we support this shorter summary of the CIC's broad views on the future of the regulator, we have chosen to provide additional thoughts and evidence to specific questions outlined below.

1. Where do each of the proposed outcomes for the system sit on a scale from very useful to not useful at all?

We believe all the proposed outcomes for the system appear to be useful. The proposed outcomes are in line with the expectations for a modern, high functioning construction and built environment sector that prioritises safety and quality at the heart of everything it does.

We agree with the primary objective (as highlighted during one of the presentation sessions) that 'Buildings and built environments are safe and high-performing' with secondary objectives following. Although we note that the secondary objectives all have a key role to play in ensuring buildings are safe and high-performing, such as products being 'fit for their purpose' and the building system being 'trusted'.

Specifically, we would recommend enhancing the following outcomes:

- Inclusion of 'Institutions' within "Companies and individuals are enabled to thrive when they operate in the interests of current and future building users." This would showcase the view that the quality of institutions has a strong bearing on competitiveness, growth and public trust. Professional institutions are critical in setting and policing standards of behaviour. Central to this mission is the creation of a group of professionals that can be trusted to deliver well and to deliver to high standards that are acceptable socially, economically and ethically.
- Under "Construction products are fit for their purpose and users are provided with accurate product information," we suggest this outcome also recognises the need for competent installers to be a key mechanism to ensure construction products are fit for purpose. This should cover where construction products (or rather solutions) are not

always needed. For example, providing advice on where a construction product may not achieve the desired outcome – such as a heat pump on an older heritage building.

- Under “The building system is trusted; users have confidence the system will act to prioritise the safety and needs of occupants,” will require greater oversight and recognition of built environment professions. At very least, this could be targeted towards those in board and senior management positions in companies that perform duty holder roles to be professionally qualified and held to account if they fail to discharge their duties.

This is similar to the model that operates within Building Control. Additionally, this could become part of requirements on organisations to demonstrate ‘organisational capability’ under the Building Safety Act. If they cannot do that then they should not be allowed to bid for certain types of works. Data about organisations that have the required organisational capability, for example those that are on some sort of register would be beneficial and we are aware of international examples of this, such as in Australia, the International Building Quality Centre (IBQC) have published the ‘Model Building Act’ as an international reference statute for the regulation and control of building work, as a key feature of a jurisdiction’s building regulatory ecosystem.¹

Conversely, although the Prospectus provides a broad vision and utilises aspirational language, we must have a series of metrics and measurables to ensure a commitment to change. Without this route map, which requires input from all the professional bodies, trade associations and standard bearing organisations, it will be challenging to achieve these proposed outcomes.

2. What role would you and/or your organisation play in achieving these outcomes?

CIOB, as a Professional Body governed by a Royal Charter, has a key role to play in communicating and championing these outcomes, not only to our 50,000 members, but the wider industry. However, we currently only reach a small fraction of the construction industry which is approximately 2.07 million according to the Office for National Statistics (ONS). However, this figure is likely to be significantly higher when you factor in the construction workforce that is captured in other Standard Industrial Classification (SIC) codes such as mining and quarrying (section B), manufacturing (section C), real estate activities (section L) and professional, scientific and technical activities (section M).²

This is why any new system is reliant on collaboration. CIOB is a member of the CIC Professional Competence Task Force. As the forum for built environment professional bodies, CIC has an important cross-sector role in suggesting how a good regulatory framework could look. Currently the Task Force is examining professional competence and governance to identify how the current method of self-regulation could be reformed in a way that meets the expectations of government and society in a robust, credible and proportionate way.

As one of the leading professional bodies covering the built environment and the world’s leading and largest for construction management, CIOB also has a role to play in leading standards and creating a better system for built environment professional bodies. We hold our members to high standards and similarly hold ourselves to high standards, especially in creation of technical guidance, CPD, training and qualifications. CIOB would be happy to take a role in educating other, smaller professional bodies on best practice for governance, standards and education. CIOB is well positioned to be the trusted expert advisor and custodian of professional standards in the construction industry. Our work is focussed on encouraging all

¹ IBQC, [The Model Building Act](#), February 2026

² Companies House, [Standard industrial classification of economic activities \(SIC\)](#), 17 November 2025

those working in construction management to adhere to the high professional standards we set. For us to do so, we strongly believe in working with the grain of the industry to secure commitment and buy-in from across the broad reach of the construction sector. The is well placed to support Government on the communications of its intentions and direction of travel

3. What will be the most important factors to achieving the proposed outcomes?

Industry 'buy-in' is an absolute must if the future regulator is to achieve its proposed outcomes. As noted in our response to question 2, professional institutions will have a key role to play here in terms of collaboration and agreeing standards of competence and ensuring their members and supply chain are acutely aware of what is expected of them under the new regulatory framework.

Chapter 1 of the Prospectus also makes an important reference to the Government's intention is to equip a new, 'integrated regulator' to recognise the full range of outcomes for the built environment, alongside the power to prioritise based on its assessment of risk. Given there has been a significant amount of change in the regulatory environment, we see this as the best mechanism, building upon current work, rather than starting from scratch.

As noted in our response to question 1, the wider built environment sector must have a series of metrics and measurables to which it will be judged on, with realistic timeframes taking into consideration the 'teething' difficulties that are often associated with embedding new regulations in the sector. For example, the Building Safety Regulator (BSR).

One of the key recommendations CIOB made in our response to the House of Lords Industry and Regulators Committee inquiry into the Building Safety Regulator (BSR) was to not act with haste.³ We recommended that, where the responsibility for the BSR was being transferred into the Ministry of Housing, Communities and Local Government (MHCLG), that the correct time was taken to ensure all functions were operating as intended before a transition was complete. Similarly, we recommend that the correct time is taken to ensure that the future regulator is fully fleshed out before activating its status. This would avoid confusion and unnecessary unintended consequences. A comprehensive communications and engagement strategy with industry will be keep to success.

4. What are the most important barriers that could prevent the proposed outcomes from being met?

There are several areas to consider here, most notably:

- **Reach of the sector:** The UK construction industry goes beyond large contractors, designers and installers. There is still a significant number of individuals who work in construction who are not members of professional institutions or trade associations and therefore are self-regulated. This part of the industry is challenging to reach but is an important part of professionalising the industry and improving its culture.
- **Timescales and resourcing:** During the formation of the Building Safety Bill, we raised significant concerns about the HSE being adequately resourced to undertake the functions of the new BSR. We noted it was crucial that the HSE is organised and resourced to ensure proper enforcement. Although improvement is now well underway, we urge the Government to learn lessons and clarify the exact resources

³ CIOB, [CIOB response to Industry & Regulators Committee inquiry into the Building Safety Regulator](#), 31 August 2025

that will be allocated to the 'integrated regulator' and document how it intends to interact both internally, but also externally with industry.

- **Oversight and intention of a new regulatory system:** As alluded to in our response to question 3, the governance of any new regulatory system or body will need careful consideration. Particularly in how it interacts with existing regulatory functions, such as the BSR and Office for Product Safety and Standards (OPPS). Furthermore, the regulatory system will need to be mapped out to consider the impact or alignment it has with other regulators that might have enforcement responsibilities, such as the Housing Ombudsman or the New Homes Ombudsman.
 - **Policy change:** Consistent policy change has hampered the progress of the construction industry. This includes changes in political priorities, consistent tinkering with areas like the planning system as well as differing focusses on the importance of regulation. A future regulator for the construction industry must be resilient to this change and take a long-term view that has buy-in across the political spectrum.
 - **Fragmentation in policy:** Similar to the above, while consistent changes in policy direction have caused uncertainty and fragility in the construction sector, so has the fragmented nature of policy relating to the built environment. Policy relating to construction comes from numerous government departments and is communicated to industry through civil service, government bodies, ministers and Secretaries of State. Despite the best intentions of the Construction Leadership Council (CLC) and professional bodies like CIOB, there is still no single coordinated voice speaking from government to construction companies and professionals. This creates confusion, apathy and often leads messaging to be lost as it tries to reach small and micro construction companies. Overcoming this challenge will be a significant barrier to the success of the future regulator. **We recommend that a single point of contact is created at a government level through the creation and appointment of a Cabinet level minister for the built environment.**
 - **Fragmentation in the construction industry:** We are pleased that fragmentation of the regulatory system is recognised. However, there is a need to go further to acknowledge that poor behaviours, inconsistent client procurement routes, and poor competence across the supply chain are systemic root causes and must be addressed alongside institutional reform.
5. What data would be needed to demonstrate whether the outcomes are being achieved?

CIOB has consistently called for better data in the construction industry, from apprenticeships to economic data to data on the impact of new technologies.

The reality is that the construction industry is one where data is sparse. CIOB's [recent research](#) into the capacity of the construction industry posits that, what data is available tends to lack structure, consistency and only provides questions not answers. In the same report, we sought to shift the debate towards the better use of data. While we have data covering output, orders, and prices provided by the ONS, little has changed in recent years to understand how this data can be used to inform decision making from both government and industry.⁴

The complexity of construction and the built environment make collection, collation, and comparisons of data harder than for most industries. The case for government building openly

⁴ CIOB, [Capacity Constraints in construction: rethinking the business environment](#), 7 October 2025

available current, compatible, comprehensive, and well collated data sources is exceptionally strong. It would benefit itself and the construction sector more widely.

The rising tide of freely available information and data this would create would lift the knowledge available to all firms active in construction.

Put simply, there is a significant amount of data that will need to be enhanced to be used for the benefit of the built environment. While we are not suggesting that the future regulator plays a role in gathering or collating this data, the case needs to be made to government that work needs to be done on what is collected and how before it can be used by a future regulator to guide its work.

9. *What are the opportunities and risks associated with automating regulatory compliance checking (e.g. AI-driven assessment), and how should oversight, accountability and human review be retained within automated systems?*

Dame Judith Hackitt's Building a Safer Future – Independent Review of Building Regulations and Fire Safety⁵ found “the current regulatory system for ensuring fire safety in high-rise and complex buildings is not fit for purpose.” The current method for identifying relevant standards is manual and time consuming, with no industry-wide programme that processes and automates changes to compliance or standards.

We are aware of systems looking to improve automated regulatory compliance checking, such as the intelligent Regulatory Compliance (i-ReC) project, a collaboration between Northumbria University and Heriot-Watt University with funding provided by the Building Research Establishment (BRE) on behalf of the Construction Innovation Hub (CIH).

The aim of the i-ReC project was to develop an automated process of gathering and checking standards that would be easily searchable using a semantic search engine. By developing a search engine and adding automation to this process, i-ReC will aim to increase project efficiencies and reduce the risk of human error.⁶

CIOB's Digital & Innovation Advisory Panel could be a useful sounding board for this project, as well as highlighting other risks. The Advisory Panel has already produced an [AI playbook](#)⁷ with a series of insights on key AI themes and forms a set of distinct vignettes which can be read individually or collectively. The chapters have been arranged in a logical sequence, but they also stand on their own.

Importantly, we note that any new automated or AI systems must be carefully scrutinised and policed. We must be cautious of oversimplification of finding technological solutions to critical areas such as building safety, particularly given there is a characterisation that construction is resistant to change.

For example, trust is a topic poorly addressed within the debate over modernising construction. The industry too readily places its faith in technology, seemingly without recognising that others might not trust it. It is worth noting, the last formal iteration of a UK

⁵ Ministry of Housing, Communities & Local Government, [Independent Review of Building Regulations and Fire Safety](#), 17 May 2018

⁶ University of Strathclyde Glasgow, [A platform-based Natural Language processing-driven strategy for digitalising regulatory compliance processes for the built environment](#), 29 June 2024

⁷ CIOB, [Artificial Intelligence \(AI\) Playbook 2024](#), 7 June 2024

construction modernisation strategy, Modernise of Die,⁸ the word “tech” appears 54 times in various forms. The word “trust” is absent.

Equally, if not more importantly, failures caused by haste in designing and constructing buildings and structures can have long tail effects given how long they last. Systemic faults may take decades to emerge. When they do the impact can be both unexpected, extensive, and exceptionally hard to rectify.

Beyond the immediate damage, they undermine trust. This frustrates future attempts at innovation. Moreover, even successful innovations in construction take time to embed, as they generally require, among other things, public acceptance, adjustments to regulation, and shifts in the supply chains.

It is critical that policy makers and the public see the introduction of new systems as a continuous process rather than an event that demands urgency. Additionally, when mistakes are inevitably made along the line, we must not be averse to collating data and learning lessons from failure. This should be regarded as a critical element to improvement.

17. What are your views on how industry can best drive the culture change and respond effectively to the changes proposed in this prospectus? In your view, how prepared are individuals and businesses for these changes? What would support industry to be more prepared?

Cultural change in what is an admittedly fragmented industry must come from the top. The construction sector is predominantly driven by small and medium sized companies, whose financial resources are often constrained by the boom-and-bust nature of the industry. Alongside this, these companies often operate on a project-by-project basis and do not have the necessary staff capacity or company time to invest in participating in a drive for a fundamental cultural change in the industry. Therefore, the onus is on larger construction companies, professional bodies and government to be the drivers of change.

In recent years, CIOB has acted to lead a shift in the attitude of clients in construction. The client often contracts the work, sets the standards and leads the way for what it wants to see out of its contractors. If we change the attitude of clients, then this will reverberate throughout the supply chain towards the smaller firms that are often harder to reach.

As noted on the CIOB website, *“being a construction client isn’t just about creating the right building for the right price within the right time frame. It is also an opportunity to contribute to solving some of society’s biggest economic, ethical and ecological problems.”*

With that in mind, CIOB has produced a suite of resources for construction clients, both professional and personal, to help ensure their work is upheld to the highest standards, as is the work of those that they contract. We recommend reviewing the guidance set out in both our dedicated [Homeowner Clients guidance](#) and [CIOB Client Guide \(2nd Edition\)](#). The information here helps guide the language that we need to use to bring about the cultural change set out by Dame Judith Hackitt as well as the necessary steps to ensure that the supply chain in construction is equipped with the right skills for the job.

Once we instil the principles of a cultural change at the top of the construction industry, it will be much easier to ensure that this trickles down to contractors, sub-contractors, SMEs and sole traders. Without the impetus from those who have the time and resources to invest in change, it will be impossible to make the argument that those who do not have those resources should do so.

⁸ Mark Farmer, [Modernise or Die](#), 17 October 2016

While we understand that bringing about more regulation is often not popular or desirable, it may be necessary in this instance. Some built environment roles are regulated, but this is often inconsistently applied or misunderstood within construction.

Greater regulation of construction professionals, or at least the regulation of construction professionals in senior leadership roles, may help drive cultural change where the consequences of not being part of this change or acting against it are punitive. This, of course, needs to be opened up into a much more detailed conversation between industry and government to understand what can be regulated, what should be regulated and how it should be regulated.

In any event, the CIOB is well placed to support regulation of certain critical parts of the construction sector, such as site managers, because we already have the architecture and systems in place to enable it. Internationally we have intelligence on best practice examples that we could bring to the table in this regard. We would strongly urge early engagement with us on the detailed nature of any such proposals, because we feel that knowledge and expertise in this area could help support Government to move forward in a pragmatic and practical way.