

The Chartered Institute of Building (CIOB)

submission to

The Ministry of Housing, Communities and Local Government (MHCLG)

on the call for evidence

Strategy for the built environment professions, trades and occupations

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Call for evidence: Strategy for the built environment professions, trades and occupations

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 understand the role of a professional body is complex in nature, and the Professional Associations Research Network (PARN) define them as being *"dedicated to the advancement of the knowledge and practice of professions through developing, supporting, regulating and promoting professional standards for technical and ethical competence."*

It goes on to say: *"In this they are all concerned with the public benefit as well as the reputation of professionals. They aim to maintain and develop professionalism and thereby securing high quality professional services for society."*

Central to the purpose of professional bodies is to provide trust. For the layperson, even for experts, gauging the potential quality of the service offered by a professional can be extremely hard without the benefit of previous experience. The damage of choosing, say, the wrong doctor, lawyer, engineer or accountant could be immense.

Professional bodies therefore set standards, technical and ethical, that must be achieved and they ensure that they are maintained and enhanced through the professional's career. This supports the public's trust.

To help build understanding of the value of professional bodies and core functions, the CIOB published a piece of research back in September 2015 to help explain these functions and demonstrate the impact on productivity, social mobility, governance and ethical standards, international and policy formation. A copy of the report can be accessed [here](#).¹

Background

As of July 2026, CIOB's membership consists of 51,535 individual members, cutting across various Grades of membership from Fellow, Member to Applicants and Students. Of these grades, 55% of members are Chartered Members, Chartered Fellows or Technical members.

As a Chartered Member (MCIOB), Chartered Fellow (FCIOB) or Technical Member (TechCIOB), professionals are permitted to add post-nominals after their name, so they will be instantly recognised by clients and colleagues globally as a professional with the skills and knowledge to complete the job to the highest standard.

CIOB is committed to supporting construction professionals to be recognised internationally for their high standards and professionalism. Because of this, we have our qualifications reviewed and benchmarked every year.

¹ CIOB, [Understanding the Value of Professionals and Professional Bodies](#), September 2015

To benchmark our qualifications, we most recently worked with [Ecctis](#). This official national agency provides services on behalf of Governments on qualifications, skills and migration. They operate worldwide with a membership and client list of over 62 countries and five continents. Ecctis confirmed that CIOB Chartered Membership is comparable to a Bachelor's Degree ([Level 6](#)), and CIOB Chartered Fellowship is comparable to a Master's Degree ([Level 7](#)).

We have not yet renewed the benchmarking as the standards were reviewed and we need to run Professional Review Assessments to reapply, but the standards have been benchmarked by us at Honours degree level (Level 6), without substantive content change in competencies. The Fellowship standards are benchmarked against those of a Master's degree level programme (Level 7), though following a review a couple of years ago this assessment no longer holds official benchmarking and we are not seeking to pursue it.

The TechCIOB is benchmarked at Level 5, comparable to a Higher National Diploma and is for those working in technical roles rather than managing people/budgets/time/contracts etc. as with MCIOB and FCIOB. This is discussed in further detail in question 73.

CIOB's membership is primarily focused on construction and project management, within the 'construction phase' as defined by this call for evidence. However, their work naturally overlaps with all phases of a project. Additionally, we also have a strong contingent of members who work in academia, heritage, surveying and managing estates and buildings. Many of our members also hold dual accreditation with other professions such as the Royal Institution of Chartered Surveyors (RICS) given the combination of roles and skills, knowledge and behaviours required.

It should also be noted that CIOB has a growing focus on supporting professional and homeowner clients. To support this, we have a Client Steering Group who help drive competence and best practice in the sector.

Taken together, CIOB's response will focus on the 'client phase', 'construction phase', and 'cross-cutting issues, themes and challenges' in the call for evidence. As noted, although we have members working throughout the lifecycle of projects, other professional and regulatory bodies will be able to present a more detailed examination of the dutyholder and competency requirements in their respective phase.

To support our response, CIOB held an in-person workshop with members and virtual roundtables with our Client Steering Group, Quality Implementation Group (QIG) and received written submissions.

Full response

This call for evidence is far ranging and, in some instances, impossible to provide a professional body perspective given the range of professions, roles and occupations that exist.

A common theme noted in our engagement with members is that well-resourced and educated clients, contractors, designers and broader professionals should be better equipped to demonstrate their skills, knowledge and experience across all phases of a project. However, each project is unique, with differing clients, project teams and sub-contractors. This makes it challenging to apply a blanket one-size-fits-all in terms of understanding where pinch points and risks exist in all projects. However, the views and evidence supplied by our members should hopefully allude and detail areas for further investigation and improvement under the future strategy for the professions.

Finally, a broad theme which was discussed in the evidence gathering sessions with members is the focus on experience. Without regular assessment, someone's experience can be

overrepresented as being credible and competent. For example, an individual may have experience of carrying out cladding remediation work on a low rise-rise residential building and not a HRB with heightened fire safety risks. This is where the value of professional body membership in terms of setting standards of competence and conduct for members and raising the bar of the profession.

Pre-design

The call for evidence rightly noted that *'client behaviour, conduct and ethics can strongly influence professional conduct elsewhere in the system'*. This is a sentiment that CIOB strongly supports.

In 2021, then CIOB President, Mike Foy, chose clients as the core focus during his presidential term. Mike believed in the fundamental importance of clients to the success of construction projects. This workstream has led CIOB to publish two editions of our [Client Guide: Leading Projects in the Built Environment Second Edition](#). This document provides professional construction clients with details about the competencies required to manage projects effectively and what is to be expected under legislation such as the Building Safety Act 2022. It also guides them through a step-by-step process of how to excel as a client and importantly how to ask the right questions.

Alongside this CIOB has produced [guidance for homeowner clients](#) which brings together FAQs for first-time clients embarking on projects in their home.

To support the development of client focussed resources, CIOB has established a Client Steering Group (CSG). This group is formed of experts across a raft of client roles. To inform our response to the 'Pre-design' section, CIOB held a roundtable with members of the CSG. During the meeting we heard specific feedback on the following questions:

Question 2. Where are the most material gaps in skills, knowledge and experience in the pre-design phase?

Question 4. What most influences behaviour and decision-making when carrying out pre-design work?

Question 6. What benefits are there when individual and organisational roles, responsibilities and accountability are clearly defined, understood and applied during the pre-design stage?

Question 9. How well do clients generally understand their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

Question 10. How well do clients generally deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

Question 11. Overall, how consistently do you think clients understand and deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

The following were highlighted when considering the broader role of clients in the built environment and should inform MHCLG's future thinking on how clients can lead best practice.

- **Consistency & Clarity** - A key issue, not just for clients but for wider built environment policy, is consistency. When trying to determine how well clients understand or carry

out their role it must be acknowledged that this is often hampered by the complicated nature of building regulations and guidance.

This was specifically noted in reference to those clients that operate on projects that cross national boundaries and interact with variations of similar legislation, such as the Building Safety Act 2022 and the Building Safety (Wales) Act 2026. Understanding two sets of complex legislative frameworks and how each applies in practice has been a challenge, particularly for those clients whose resources are limited.

CIOB has also previously noted the sometimes-conflicting nature of building regulations guidance, for instance the conflict that arises on priorities such as overheating and security. This conflict can make the job of a client harder, especially first-time or relatively new clients. It is worth noting this was an issue raised during the Grenfell Tower Inquiry. We are aware that there is an ongoing review of building regulations guidance in which CIOB is participating.

Lastly, it was highlighted by the CSG that it is difficult for clients to know where to look for guidance. There are multiple sources of information that clients need to access and understand, from building regulations and European Norms to British Standards. This causes confusion and an overreliance on consultants to provide interpretation.

- **Size Matters** – Understanding of and delivery against the building regulations often comes down to the size of the organisation undertaking the client role. Larger clients will be able to put more resources into understanding the complex raft of building regulations and guidance than smaller clients who are often constrained by the need to increase earning hours and work from project to project. The same can be said of clients' understanding of their own dutyholder obligations as well as their ability to invest in training. However, at the same time, larger clients are more likely to work on complex projects with more intricate interdependencies.

This means that while larger clients can generate a better understanding of building regulations, they may struggle more to deliver against them. While smaller clients may be less able to spend the time understanding the regulations, they may be better able to deliver against them because of the size and scale of the projects they represent.

- **Outsourcing** – A consistent point raised by members was the overreliance on consultancies in the built environment and the way this has replaced the importance of individual upskilling.

This goes hand-in-hand with the point above in that, when large or small clients do not have the time or resources to dedicate to gaining an understanding of the specific regulations, guidance, norms or standards that apply to their project, the default setting seems to be to appoint a consultancy that does. While this may work for some and there are certainly consultancies who would be able to demonstrate best practice, there are little to no checks on their knowledge. The argument could be made the clients have a role in promoting excellence and therefore, need a deeper understanding of the Building Safety Act 2022 and the building regulations than the reliance on consultant would provide in the long-term.

Part of this is a symptom of the wider structure of the construction sector where work is procured and then passed out onto consultants and contractors. It is also influenced by insurance requirements and risk management strategies. However, this takes away from the importance of spending the time upskilling to ensure that individuals are equipped with the knowledge to thrive, rather than just passing that responsibility down the chain. Additionally, in accordance with the Building Safety Act 2022, the

client or responsible person can delegate the task but not the responsibility. We do not believe that this is widely understood or accounted for as a risk in constantly outsourcing work within project teams.

There were numerous other key issues discussed, and evidence provided by members and as part of the CSG meeting. Further points have been condensed into bullet points below each question.

Question 2. Where are the most material gaps in skills, knowledge and experience in the pre-design phase?

There is an array of gaps in skills, knowledge and experience, including:

- Inconsistencies in the ability to identify early-stage risks.
- A reliance on assumptions rather than evidence (see question 6 on intrusive investigations and risk registers).
- Lack of understanding by clients of regulations and unaware of their responsibilities (see question 9 on client appointments).
- Data literacy and information management – notably around the Golden Thread of Information.
- Awareness and compliance with the Building Safety Act and other regulatory changes and processes.
- Management companies appointed during the early stages of projects can often lack the knowledge of regulations.

Question 4. What most influences behaviour and decision-making when carrying out pre-design work?

Competent clients play a pivotal role in collective efforts to raise standards, improve collaborative working and encourage innovation. The inherent complexity of many construction projects can, without a competent client, lead to poorly prepared or planned projects, inefficiencies, delays and unnecessary cost. This is caused by misunderstanding, miscommunication and misaligned expectations as the project team goes through the work in a different sequence or at different rates. Unclear client briefs, commercial pressure and viability and a lack of understanding of the application of roles, responsibilities and accountability under the Building Safety Act and the Building Regulations also lead to negative behaviour and decision making. Similarly, if a client is not competent, there is an inherent contradiction in the need for them to determine the competence of the consultants that they engage as part of a project.

Our Client Guide notes the benefits of 'behavioural procurement' where the behavioural and cultural fit of suppliers are analysed in addition to traditional selection criteria. Clients who have adopted this approach, for example the Environment Agency and National Highways, claim significant value is created, resulting in higher quality, faster delivery, lower costs – all enabled by a team that is collaborating and working towards a singular goal.

An advantage of assessing behavioural and cultural fit is that it provides a common language to then develop the team and monitor performance. This is consistent with the [Construction Innovation Hub's Value Toolkit](#), which emphasises the importance of agreeing behavioural performance measures early in the life cycle to achieve social and environmental, as well as economic value. The Toolkit's process encourages organisational alignment by linking KPIs back to organisational policies ('strategic drivers') and to 'outcome drivers', thereby minimising mission creep and keeping the focus on the project's original vision.

Question 6. What benefits are there when individual and organisational roles, responsibilities and accountability are clearly defined, understood and applied during the pre-design stage?

- *When clearly understood roles, responsibilities and accountabilities are combined with suitable resources there is a noticeable positive effect on project outcomes. These efforts should be led by construction clients, who should be the focal point of efforts to raise competency.*
- *Clients who take the lead in showing competence and take the lead in requiring competence from others have positive ripple effect on those joining project teams. Similarly, when project management responsibilities are undertaken by skilled teams or individuals who take a lead in showing competency, better outcomes will likely be generated.*
- *Roles and responsibilities are clearer and easier to define when the client takes an active 'on-the-ground' role in management and does not treat the project as 'arms-length'. This can be achieved through secondments or as a permanent employee.*
- *A Projects Director of a Façade Specialist noted that one of the strongest skills is the judgement to invest early in thorough intrusive investigation, an accurate employer's requirements and a detailed risk register before the scope of a project is fixed. The largest gap is client-side competence and capacity, especially amongst smaller freeholders, Right to Manage (RTM) companies and managing agents who now hold Dutyholder status but lack required expertise. Scopes are too often fixed on incomplete Fire Risk Appraisal of External Walls (FRAEW) which without sufficient intrusive opening-up creates life-safety and financial risks.*
- *Recommendation – While we acknowledge that construction projects vary greatly and, in most circumstances, no two projects are the same, we feel that there is some benefit to be gained from government, working with industry, to develop a series of precedents around design responsibility matrices. These could help define how different roles in construction work and what responsibilities individuals or organisations carrying out that role would have. As an example of this, CIOB's previous [Code of Practice for Construction Management 4th & 5th Editions](#) contained a table of the distinct duties of construction project managers both as an internal and external appointment. This guidance helped clarify the different nature of internal and external appointments and helped to bring clarity to the industry. This could be something that government and industry models future matrices on. A copy of the table from the 5th Edition is included below.*

Duties*	Client's requirements		Independent project management	
	In-house project management	Project co-ordination	Project management	Project co-ordination
Be named in the contract	■		+	
Assist in preparing the project brief	■		■	
Develop project manager's brief	■		■	
Advise on budget/funding/programme/risk management arrangements	■		+	
Advise on site acquisition, grants and planning	■		■	
Arrange feasibility study and report	■	+	■	+
Develop project strategy	■	+	■	+
Prepare project handbook	■	+	■	+
Develop consultant's briefs	■	+	■	+
Devise project programme	■	+	■	+
Select project team members	■	+	+	+
Establish management structure	■	+	■	+
Co-ordinate design processes	■	+	■	+
Appoint consultants	■		■	+
Arrange insurance and warranties	■	■	■	+
Select procurement system	■	■	■	+
Arrange tender documentation	■	■	■	+
Organise contractor prequalification	■	■	■	+
Evaluate tenders	■	■	■	+
Participate in contractor selection	■	■	■	+
Participate in contractor appointment	■	■	■	+
Organise control systems including reporting procedures	■	■	■	■
Monitor progress	■	■	■	■
Manage and monitor meetings	■	■	■	■
Authorise payments	■	■	■	+
Organise communication/reporting systems	■	■	■	■
Provide project co-ordination	■	■	■	■
Issue health and safety procedures	■	■	■	■
Address environmental aspects	■	■	■	■
Co-ordinate statutory authorities	■	■	■	■
Monitor budget and changes	■	■	■	■
Develop final account	■	■	■	■
Arrange pre-commissioning/ commissioning	■	■	■	■
Organise handover/occupation	■	■	■	■
Advise on marketing/disposal	■	+	■	+
Organise maintenance manuals	■	■	■	+
Plan for maintenance period	■	■	■	+
Develop maintenance programme/ staff training	■	■	■	+
Plan facilities management and coordinate BIM	■	■	■	+
Arrange for feedback monitoring and post completion review	■	■	■	+
Investigate BIM implementation	■	■	■	■
Liaise with funding institutions	■	■	■	+
Liaise with ground landlord	■	+	■	+
Liaise on acquisition, valuation, disposal of land	■	+	■	+
Liaise with agents over leasing tenants queries etc.	■	+	■	+
Liaise with client over move to new premises	■	+	■	+
Liaise coordination with legal agents	■	+	■	+
Advise and manage client's changes	■	■	■	■

*Duties vary by project, and relevant responsibility and authority.
Symbols: ■ = suggested duties; + = possible additional duties

Question 9. How well do clients generally understand their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

Feedback received from the CSG and other members on this question was mixed. Attendees highlighted the varied nature of client understanding and noted several important factors to consider, including that:

- *Understanding is often impacted by the nature of the client and the type of construction that is being undertaken. Commercial clients will likely have a much greater understanding of building regulations than domestic clients who may be working on smaller projects. Similarly, landlord clients may also have a different level of understanding depending on the types of buildings they preside over.*
- *A lack of clear advice from regulatory bodies clearly impacts on understanding. An example was provided to CIOB of a hospital building that, while not entirely within the criteria of a Higher-Risk Building (HRB) (7 storeys or 18 metres in height), was situated on a slope meaning that a relatively small portion of the building would exceed 18 metres. This generated confusion about whether the building was classified as an HRB*

or not. While technical expertise was sought on the matter, no advice or guidance was provided by the Building Safety Regulator who should ultimately be responsible for helping preside over this matter.

- Regulations and guidelines are often down to interpretation which can differ greatly from organisation to organisation and from individual to individual, making consistency of understanding difficult.*
- The size of the client often has a large impact on the level of resource and time being committed to generating an understanding of responsibilities.*
- While this question asks about the responsibilities relating to regulation that applies in England, those clients operating on project portfolios that cross borders in the UK will have to navigate at least two complex systems which can create confusion and conflation between responsibilities in each jurisdiction.*
- Regardless of project size or company size, some clients have not understood the role they have to play in appointing other roles to a project. The example of Principal Designer has been highlighted as one that, while those operating on HRBs seem to understand that they need to appoint this role, those operating on non-HRBs still believe this does not apply to them. This points to a wider lack of awareness of the core parts of the Building Safety Act 2022 that remains in the industry.*
- Understanding depends heavily on the work that is being undertaken. For regularly minor works, landlord clients are having to pass through significant regulatory hurdles for minor works such as new internet cables in HRBs. While the additional regulation here is necessary for work on HRBs, installers and product providers may have a differing level of knowledge about the regulatory requirements, often causing confusion as landlord clients can often hear about minors works done after the fact.*
- Often, public sector clients will not have the financial resources available to compete with private sector salary bandings, meaning that expertise may need to be outsourced rather than created through direct employment. This impacts the quality and consistency of advice as consultant teams change and priorities are split more widely across different client portfolios.*
- For public bodies, the current tender processes overly emphasise the importance of 'value', often translated to the contractor with the lowest price point, instead of the one which balances costs with quality. If we move away from tendering purely at the lowest cost and accept a more realistic profit margin expectation throughout the supply chain it will not only help push away from the often noted 'race to the bottom' on quality but also allow risk to be dispersed more equally throughout a project, incentivising better communication and a better understand of roles and responsibilities. This ultimately creates better outcomes.*
- One example from a specialist consultancy helping organisations with Safety Cases noted it was fairly common to see clients who are unaware that they must define outcomes, understand risk and commission competent advice. Thus, creating challenges for the next stages of design and construction.*
- Another member informed us that a reoccurring problem he sees is that many clients do not understand the Building Regulations Principal Designer must be Client appointed, and that duties under Part 2A are widely misunderstood outside the High-Risk Buildings (HRB) regime.*

- *Recommendation – As part of the wider process of providing greater oversight and scrutiny to the construction industry, government should undertake an exercise to better define ‘value’ as part of the tendering process for public bodies. Value, in this instance, can be better separated from cost alone and widened out to include partnership working, innovation, professionalism and other wider criterion so that best value moves away from the accountancy perspective and towards what represents best value for the industry.*
- *Parts of the industry prioritise time and cost over delivering buildings that produce the right outcomes in terms of quality and safety. The lack of accountability in the construction industry, combined with that lack of enshrined regulation on what is required from a client, means that there will never be a full understanding of who does or who doesn’t understand their responsibilities.*

As can be seen from the notes provided above, there is no clear picture of understanding from clients of the responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010. The picture is far more nuanced and needs to be portioned out to each type of client and the works they undertake to answer in full.

Question 10. How well do clients generally deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

- *The broad answer to this question fundamentally depends on the results of Question 9. If there is a split in consensus, generally leaning to the fact that clients do not consistently understand their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010, it tracks that they will similarly not consistently deliver their responsibilities.*
- *It was noted by the CSG that the consistency and the rate in which certain responsibilities are undertaken often shows both the ability for clients to deliver on their responsibilities, but also to understand them at the same time.*
- *With more repetitive oversight responsibilities, it was noted that it is common for these to be delegated away by the client in order to not have to undertake the same task numerous times, showing that while some might deliver on their responsibilities on individual occasions, understanding how they deliver them consistently is key to answering this question.*
- *In opposition to the previous question, the ability for a client to deliver on their responsibilities is less about the size of the organisation and more about their competency and integrity. It was noted that, in some instances, larger clients were more likely to delegate responsibilities to project management organisations, leading to less consistent delivery.*
- *Understanding responsibilities does not directly translate to being able to deliver them. Often delivery rests in the hands of external consultants, whose competency requirements can be harder to track and understand. There is more work to be done to ensure that clients are better aware of who they are appointing to carry out works and how qualified they are to do the works.*
- *Answering this question is far more nuanced than saying clients do or do not deliver their responsibilities. The reality is that it depends on the type of client as well as where their vested interest lies. There is also the reality that what a client contracts out for will likely be different from tender to delivery, or that a change of personnel in the client team or in a contractor will impact on the consistency of delivery.*

- *Recommendation – Government should seek to introduce additional guidance for clients on their roles and responsibilities. This guidance can focus on how a client demonstrates competence, what functions they fulfil depending on the type of work and the stage in which they become a client as well as how they demand competency from contractors and consultancies. Importantly, this work should be parcelled out depending on the type of client – i.e. guidance for institutional clients, domestic clients, commercial clients, local authority clients, etc. This is something CIOB can assist with. Our ‘Client Champions’ represent a raft of types of clients and can provide expert guidance on what they would want to see.*
- *Similarly, there is no competency framework that exists for clients in the way that one does for Principal Designers and Principal Contractors through PAS 8671 and PAS 8672. Baseline competency expectations for clients would be beneficial to ensure they have the skills necessary to disperse throughout projects.*
- *Recommendation – Industry should look at its own requirements for professional body membership to understand whether the minimum competency standards for membership need raising or if they are sufficient to ensure that membership of a professional body is truly a mark of quality in our industry.*

Question 11. Overall, how consistently do you think clients understand and deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

We believe that consistency in this context is hard to define and far more of a sliding scale than is presented in this call for evidence.

Question 16. Thinking about the issues raised in your responses to questions 1-15, what practical changes or actions would make the biggest difference to how pre-design work is carried out?

We have highlighted several practical actions that would make a difference to competency, quality and consistency in the pre-design phase.

- **Recommendation** – As part of the wider process of providing greater oversight and scrutiny to the construction industry, government should undertake an exercise to better define ‘value’ as part of the tendering process for public bodies. Value, in this instance, can be better separated from cost alone and widened out to include partnership working, innovation, professionalism, demonstrating the prioritisation of quality and safety and other wider criterion so that best value moves away from the accountancy perspective and towards what represents best value for the industry.
- **Recommendation** – Government should seek to introduce additional guidance for clients on their roles and responsibilities. This guidance can focus on how a client demonstrates competence, what functions they fulfil depending on the type of work and the stage in which they become a client as well as how they demand competency from contractors and consultancies. Importantly, this work should be parcelled out depending on the type of client – i.e. guidance for institutional clients, domestic clients, commercial clients, local authority clients, etc. This is something CIOB can assist with. Our ‘Client Champions’ represent a raft of types of clients and can provide expert guidance on what they would want to see.

- **Recommendation** – Industry should look at its own requirements for professional body membership to understand whether the minimum competency standards for membership need raising or if they are sufficient to ensure that membership of a professional body is truly a mark of quality in our industry.
- **Recommendation** – Government should foster greater collaboration between industry, professional bodies and relevant regulations. In recent years, the advent of stakeholder groups feeding directly into policy making has been positive. It has also enabled for real-time feedback on regulatory changes to be fed directly into the system, part of which has led to positive changes in areas like the efficiency of the Building Safety Regulator. We note that this is also a recommendation with the feedback provided by the Royal Institution of Chartered Surveyors (RICS) in their response to this consultation.

Construction

The call for evidence rightly noted that the *'construction stage of a building has the potential to involve the widest range of professions, trades and occupations in a building's lifecycle'*. It further notes that the *'skills, knowledge and experience required can vary significantly depending on the nature of the work, the level of risk, and the degree of specialisation'*.

As the leading professional body for construction management, our members work in the development, conservation and improvement of the built environment and may use the designation 'Chartered Builder' or 'Chartered Construction Manager'.

The majority of our members are responsible for commissioning, advising on or managing the delivery of construction projects, whether this is creating new built assets or adapting or maintaining existing ones.

For the purposes of this response, we have focused on this definition of construction management. However, the construction process is complex, and a project requires many different skills, some of which our members also undertake.

Recent inquiries into failures of quality in the industry, including Grenfell, have underlined the critical role that Construction Managers must play in ensuring that buildings are compliant with building regulations and are safe for those who occupy and use them.

To inform our response to the 'construction' section, CIOB held a roundtable with members of our Quality Implementation Group (QIG), Chaired by CIOB Past President Paul Nash. During the meeting we heard specific feedback on the following questions:

Question 36. Where are the most material gaps in skills, knowledge and experience in the construction phase?

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

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

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

Question 44. How well do principal contractors generally deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

Question 45. Overall, how consistently do you think principal contractors understand and deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

Question 48. Which actions, behaviours and decisions at the construction stage most influence subsequent stages of the building lifecycle, and which support or undermine effective transition into the occupation and maintenance stage?

Question 36. Where are the most material gaps in skills, knowledge and experience in the construction phase?

As noted above, there are numerous roles and functions during the construction phase that are Cross-cutting roles, most notably the principal contractor who manages and coordinates work and safety rules during construction as well as tier 1, 2 and 3 contractors who carry out project delivery, through to local subcontractors who often carry out specific trade tasks like bricklaying or plumbing under the main contractor.

This is an important distinction, primarily because the subcontractor market is often unregulated or overseen to some extent by industry bodies. This fragmentation of duties also means there are varying levels of training, supervision and understanding of regulatory duties.

Within CIOB membership, our Continuous Professional Development (CPD) policy requires members to undertake a minimum of 25 hours of CPD in each subscription year. Furthermore, 12 hours of Members' CPD activities must cover our core themes, with at least 3 hours CPD activity recorded for each theme. These are: **Health, Safety and Wellbeing, Sustainability, Quality and Professionalism**. Additionally, 13 hours of CPD may be chosen by the member to meet their own learning and development needs. These may relate to their specific role or function or include further learning in a different area.

Our CPD seeks to prepare Construction Managers with the skills and knowledge to undertake their roles and demonstrate their experience in the checking and verification process as noted in our response to question 73.

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

There are several key influences on behaviour and decision-making when carrying out construction work. Some of these include:

- Financial gain or cost cutting to drive profits and profitability.
- Commercial pressures driven by unrealistic client demands and expectations.
- Time pressures driving decision making to meet unrealistic deadlines.
- Necessary business decisions to ensure survival from project to project.
- Parameters set out in contracts or tender submissions.
- The construction subcontracting model and dispersion of risk.
- The specific business models in parts of the industry which prioritise speed and lowest cost over quality and safety.
- The sometimes-negative industry culture which impacts areas like quality control. This has been particularly prevalent in the new build housing sector at site level and on domestic retrofit.

While these influences can create negative behaviours and contribute to the industry's race-to-the-bottom, there are some in our industry who embody more positive behaviours and have a drive to do better and be better. This is often typified by membership of a professional body which, where not a mandatory requirement for Construction Management professionals, is a mark that they want to set themselves apart from the rest of the industry.

Even if an individual joins a professional body for reasons outside of the motivation to be better, the need to continuously demonstrate professionalism through CPD and additional learning ensures they also embody best practice.

Continuous professional development can drive or influence more positive behaviours as continued reflection on actions and exposure to other examples of best practice will help individuals see projects from a different angle or through the lens of professionalism.

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

Clearly defined roles and responsibilities broadly improve decision-making leading to better project outcomes with a clear sense of accountability. Clear accountability also reduces sequencing errors, late design changes and mis-installation which has clear importance on building safety. Furthermore, clarity of role, responsibility and accountability also enable resolution should conflict; disputes or disagreement arise.

Focusing on HRBs it can also lead to a stronger 'golden thread' of information with evidence clearly captured and duties of the Principal Designer and Principal Contractor clearly defined and working to the same framework.

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

Question 44. How well do principal contractors generally deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

The level of both understanding and delivery of responsibilities by principal contractors is mixed. In pulling together our response, we spoke to a CIOB member who conducts Building Safety Act 2022 awareness courses on a weekly basis. They indicated that, while understanding and delivery is mixed, there is more interest in wanting to learn.

The member we spoke to highlighted that it is '*more about ignorance than indifference*'. There are those who want to learn and there are those who simply don't know that the responsibilities apply to them rather than those wilfully ignoring their responsibilities. It was also noted that, in their experience, the vast majority of those who are not aware of their responsibilities are those who are not members of a professional body. We would be pleased to put MHCLG in contact with this member to hear more about their experience in conducting Building Safety Act 2022 training.

Finally, to support principal contractors, CIOB has developed its own Principal Contractor Competency Certification Scheme (PCCCS) to provide a route to proving competency as a Principal Contractor, as required by the Building Safety Regulator. Upon discussions with members who have gone through the PCCCS, they note the challenging nature of completing the Scheme – which is important for raising the bar. A case study from a CIOB member at Tilbury Douglas who completed the PCCCS can be found [here](#).

Question 45. Overall, how consistently do you think principal contractors understand and deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010?

There are several additional points to note here:

- While the question asks for an answer between 'very inconsistently' and 'very consistently'. However, it is far more complex than this.
- It should be noted that the regulatory system is often complex and is comprised of numerous sources, with technical language used to prescribe actions and outcome. However, it remains a fact that the average reading age of adults in the UK is between 9 and 11. There is a case to be made that more accessible versions of the building regulations need to be created for those who struggle with reading or interpretation.²

Question 48. Which actions, behaviours and decisions at the construction stage most influence subsequent stages of the building lifecycle, and which support or undermine effective transition into the occupation and maintenance stage?

There are several key actions, behaviours and decisions that influence the subsequent stages of the building lifecycle. Some of these include:

- Early contractor engagement and retaining contractors throughout project lifecycles to enable better information sharing and decision making.
- Good project management.
- Well informed, engaged and skilled clients leading projects and demonstrating competence from the 'top down'.
- Setting realistic expectations throughout the early phases of the project and continuing this thinking through the construction phase.
- Appointing a team who feel comfortable to challenge decision making and thinking where necessary to improve project outcomes.
- Good quality control.
- A good understanding of roles and responsibilities.
- Clients, contractors and subcontractors that understand that compliance is just the first step on the ladder and that it should be viewed as a minimum rather than a target.

Cross-cutting issues, themes and challenges

The construction industry is fundamentally interconnected with all other aspects of the building lifecycle process. Those operating in key construction roles are involved in the conception of a building, in charge of creating the physical asset and retained as important parts of the occupation and remedial phases where necessary. Therefore, the inclusion of questions focusing on these cross-cutting themes, roles and issues will be integral to a successful future regulatory regime.

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

All members of the CIOB are bound by the Rules and Regulations of Professional Competence and Conduct (RRPCC). The RRPCC are linked back to the Royal Charter and Bye-laws - specifically Bye-Law 31. Any alleged breach of the RRPCC would be considered and investigated under the Disciplinary Regulations. Any breach of the RRPCC may be considered

² NHS North East and North Cumbria, [Regional health literacy](#)

misconduct in accordance with Bye-Law 33(a)(i). For reference, the RRPCC has been attached to this submission under Appendix A.

CIOB has two main processes which we follow to monitor skills, knowledge, experience, behaviours through Continuous Professional Development (CPD) auditing, as well as a strict process for Professional Misconduct.

CPD Auditing

All members of the Institute are expected to undertake regular CPD in accordance with the CPD policy, except for those on retired grades of members (RetMCIOB and RetFCIOB).

Rule 10 of the RRPCC states: *'Members shall keep themselves informed of current thinking and developments appropriate to the type and level of their responsibility. They should be able to provide evidence that they have undertaken sufficient study and personal development to fulfil their professional obligations in accordance with Institute's policy for Continuing Professional Development (CPD).'*

When individuals join CIOB membership they agree to abide by the RRPCC. Individuals must agree to abide by the RRPCC each year on renewal of membership.

CIOB have made several changes to our CPD auditing and policy in recent years:

- Prior to 1 January 2023, members were asked to complete a self-assessment form, confirming compliance with Rule 10.
- On 1 January 2023, CIOB launched a new CPD policy where members must achieve a minimum of 10 CPD points and reflection on each activity of learning.
- On 1 January 2026, CIOB launched a new CPD policy where members must achieve a minimum of 25 CPD hours in a calendar year and provide an overall reflective account at the end of the subscription year.

The latest 2026 CPD Policy has been attached to this submission under Appendix B.

We note there are limitations in these policies. However, to strengthen the monitoring process and to ensure members are abiding by their obligations under Rule 10, we undertake random audits of the membership each year. Although these audits are random, CIOB ensure that certain people – namely those in a decision-making position – to set an example, are audited, such as Trustees, members of our Professional Conduct Committee and Professional Review, Fellowship, and CIOB Assessment Assessors.

If members fail to comply with the CPD Audit process, then they enter into the disciplinary procedure for alleged breaches of the RRPCC. The result of the disciplinary process could be a sanction from no case to answer through to expulsion. We are happy to circulate further information of this Audit Process if helpful.

To further highlight the robustness of this auditing process, data since 2022 can be seen below:

- In 2022 we audited 1,619 members, of which 32 received a reprimand and undertaking at Reg 7.1 (our procedure as set out in Reg 7.1 is included in the attached copy of our Disciplinary Regulations 2024) and 24 final hearings were held (13 expulsions, 7 Reprimands and undertakings, 1 case to answer but no sanction, 2 no case to answer and 1 withdrawn).

- In 2023 we audited 2,116 members, of which 11 received a reprimand and undertaking at Reg 7.1 and 23 final hearings were held (11 expulsions, 7 Reprimands and undertakings, 1 no case to answer and 4 withdrawn).

2022 and 2023 audits were under the old 'self-assessment' process. 2024 – 2026 were carried out on the points based CPD policy.

- In 2024 we audited 1,816 members, of which 25 received a reprimand and undertaking at Reg 7.1 and 94 final hearings were held (74 expulsions, 17 Reprimands and undertakings, 1 no case to answer and 2 withdrawn).
- In 2025 we audited 2,052 members, of which 41 received a reprimand and undertaking at Reg 7.1 and 90 final hearings were held (44 expulsions, 40 Reprimands and undertakings, 3 no case to answer and 3 withdrawn).
- In 2026 we audited 3,076 members. We are currently working these through the audit and disciplinary process. Currently Q1 audit has 15 members receiving a reprimand and undertaking at Reg 7.1 and 24 final hearings scheduled for August 2026.

Ideally, the process of CPD should be treated as an annual cycle of focusing on the review of past learning and identification of future needs, rather than the pursuit of hours of learning or mandatory courses. Our CPD and audit process seeks to strengthen this commitment through the submission of a reflective statement on learning and a future reflection. We are also in discussions about significantly increasing our audit numbers for 2027.

Complaints/Professional misconduct.

CIOB has a robust complaints process, and any person can make a complaint about a member through our website: [Making a Complaint | CIOB](#).

If a complaint is received, we will consider this through our Disciplinary Regulations 2024, which has been attached to this submission under Appendix C.

We will check to see if the person is a CIOB member and whether this is something that we can consider, i.e. it is not a financial dispute. We can then instruct an investigator (who are members of the CIOB and attend annual training hosted by the Governance team and our legal assessors) to consider the case. If breaches of the RRPCC are found, we once again follow a strict procedure that we would be happy to provide further information of.

Once again, sanctions could be expulsion, suspension with/without conditions or reprimand with or without an undertaking. Should it be relevant, we would be happy to share detail on the numbers of individuals that have gone through misconduct cases.

Educational Framework

These, like the overall competence standards, have been developed by CIOB members working in Education alongside practitioners, and take into account the National Occupational Standards (NOS) and Quality Assurance Agency (QAA) Standards along with best practice in construction and in education practice, including EDI, resourcing, student experience, etc.

The content standards are divided into the themes CIOB considers key to construction management and levelled against the Framework for Higher Education Qualifications. We use these to determine whether a Higher Education programme meets the standard we would expect for someone being educated to join the profession and thus to grant CIOB Accreditation to HE providers and their programmes, and to determine whether a membership candidate may

be exempted from further study before applying for CIOB membership. Our Postgraduate and Undergraduate Education Framework's have been attached to this submission for information under Appendix D and E.

CIOB Membership Standards Framework

CIOB assesses competence at three progressive professional grades:

1. TechCIOB – Technical Membership
2. MCIOB – Chartered Membership
3. FCIOB – Fellowship

Each grade reflects increasing levels of responsibility, competence, leadership and contribution to the construction profession.

1. TechCIOB – Technical Competence

Technical Membership (TechCIOB) recognises occupational competence in technical and supervisory construction roles. All applicants must complete six themed sections, with Technology and Ethics & Professionalism assessed as mandatory core sections. It focuses on technical and operational competence.

- Typically suitable for technical specialists, supervisors and site-based practitioners.
- Assesses the application of technology, sustainability, legislation, site supervision, health and safety, and professionalism.
- Emphasis is on performing technical and supervisory responsibilities competently.

2. MCIOB (Chartered) – Professional Competence

Chartered Membership (MCIOB) assesses competence through six core construction management competencies.

- Focuses on construction management and professional competence.
- Typically suitable for managers responsible for projects, resources and people.
- Assesses planning and monitoring work, cost control, developing people, technology, collaboration and compliance.
- Requires integration of health and safety, sustainability, quality and professionalism across all competencies.
- Emphasis is on successfully managing projects, teams and organisational outcomes.

3. FCIOB (Fellowship) – Strategic Leadership

Fellowship (FCIOB) represents the highest level of CIOB membership and is designed for senior leaders who have demonstrated a significant contribution to their organisation, the profession and wider society.

- Typically suitable for senior leaders, directors and industry influencers.
- Assesses leadership behaviours, leading people, leading organisations and leading the profession.
- Emphasis is on strategic leadership, governance, innovation, talent development, environmental leadership and societal impact.

Chartered Membership (MCIOB) assesses competence through six core construction management competencies. **Technical Membership (TechCIOB)** recognises occupational competence in technical and supervisory construction roles. All applicants must complete six

themed sections, with Technology and Ethics & Professionalism assessed as mandatory core sections.

Typical Progression Through CIOB Membership:

Area	TechCIOB	MCIOB (Chartered)	FCIOB (Fellowship)
Primary Focus	Technical competence	Professional competence	Strategic leadership
Scope	Own work and operational responsibilities	Projects, resources and people	Organisation, profession and society
Assessment	Technical application of standards	Management and leadership competence	Leadership and professional impact
Typical Outcome	Competent technical practitioner	Competent construction manager	Professional and industry leader

Further information on the CIOB Membership Standards Framework can be found in Appendix F.

Maintaining the Competency of Members

Membership candidates at all levels are assessed via a competence-based assessment at the appropriate level and against the appropriate standards for the grade. Here they provide a narrative account of how they have demonstrated each competence in their work.

The overall application is signed as 'accurate' by an employer/manager and then this application is assessed for whether or not it demonstrates competence by our group of trained CIOB member assessors. Results are then moderated to ensure consistency and fairness across all candidates and a result confirmed. Successful candidates are awarded membership at the grade applied for (TechCIOB, MCIOB or FCIOB). Borderline candidates for all grades are offered an interview to clarify unclear claims, and deferred candidates are offered feedback for improvement and the chance to resubmit if this is appropriate.

MCIOB and FCIOB Candidates' educational qualifications are assessed against the Education Framework to determine whether they have knowledge of the content therein. Those with substantial learning covering the topics are deemed 'cognate', those educated to the appropriate level (UK Bachelor's degree or overseas equivalent – as determined by UK ENIC/Ecctis) but without full coverage of construction are deemed 'non-cognate'. They are required to gain more experience in management within a construction context prior to Chartership application. Those without a Bachelor's degree qualifications may gain the knowledge required via our education and examination scheme, the [Chartered Membership Programme](#) (CMP), delivered via approved education providers.

All candidates undertake the same membership application processes on the same application forms (although educators have an amended set of standards, reflecting their role in bringing people into the industry as opposed to themselves practising).

Competency Schemes

CIOB provides a large array of guidance, training and certification to raise standards in building safety. We covered much of this in our previous submission to the Single Construction Regulator Prospectus, notably our Principal Contractor Competency Certification Scheme (PCCCS) and Principal Designer Competency Certification Scheme (PDCCS). In discussions

with members that have completed the PCCCS, they have commented that it is a robust and challenging procedure which we deem as important to raising the bar in terms of competence and quality. We also have a case study from members who have undertaken the Scheme.

Equity & Inclusion

CIOB facilitates its employers' [Diversity & Inclusion Charter](#) (currently 425 company signatories) that has the objective of supporting organisations and individuals to ensure that they are embedding inclusive and welcoming practices and to promote clear accountability in doing so. Employers who sign up to the Charter commit to meeting five key standards and meet on a quarterly basis with the aim of sharing best practice on inclusive practices across the built environment sector.

In addition, CIOB works in partnership with the other professional institutes in the sector (Chartered Institute of Architectural Technology, Chartered Institution of Highways Transportation, Chartered Institution of Civil Engineering Surveyors, Landscape Institute, Institution of Civil Engineers, Royal Institution of British Architects, Royal Institution of Chartered Surveyors and Royal Town Planning Institute) under the 'B.E. Inclusive' banner, on a five-year action plan agreed with the respective CEOs. One of the aims of this work is to ensure individuals working in the sector have a good understanding of inclusive culture and welcoming behaviour to promote recruitment and retention in the sector to address the skills gaps and address identified underrepresentation. The areas of focus include consistent support for 'returners'; promoting work-shadowing; and addressing problematic behaviour in the industry for the benefit of all.

Question 75. How are emerging technologies or changing practices shaping how people and organisations work across the building lifecycle, and what are the greatest barriers to adopting new technology?

The construction industry is inherently innovative in its nature. Data, technology and innovation underpin critical decisions made across project lifecycles and form the foundation for organisations current and future decision making. However, while the industry is innovative, it can sometimes be too ready to adopt new ways of working without truly understanding how they may work in practice and if the business model exists to ensure they become bedded in across the supply chain.

CIOB has been at the forefront of highlighting the way in which new or emerging technologies can help shape business decisions. In 2024 we published our first [AI Playbook](#). This playbook was created by pulling together a series of insights on key AI themes and included recommendations on the practical uses of AI in construction. Since then, the proliferation of AI across planning, project management and data collection has shown the way in which construction firms can welcome new technologies into their ways of working.

At present, CIOB is exploring how AI can assist in auditing CPD from 2027 onwards. Specifically, we are exploring how AI could be used to scan CPD records to check compliance in a more streamlined fashion. While this will potentially allow us to conduct wider audits of member's CPD compliance, at present, we may be limited by those who upload their CPD to our portal. Ultimately, the AI use case will only provide a clear benefit to the process if the data is there for it to harness.

However, while we have been keen advocates for adopting new ways of working, we have also urged caution as high-profile failures in new technologies have caused long-lasting damage to the industry's reputation amongst clients and consumers. This can be seen in practice through the failure of modern methods of construction (MMC) in revolutionising volumetric housing delivery.

While we will not go into detail on the history of MMC as it pertains to volumetric housing, we have highlighted below some of the primary reasons for its widespread failure. These key themes can often translate to why other innovations fail and should be viewed as a series of 'checks and balances' that should be used to judge the use case for future innovations.

- **Success metrics** – Undue urgency in the MMC debate led to poor decision making. The proliferation of new technology is a long process in construction and should be viewed as such. Needing fast results and quick profits leads to a lack of understanding of how and why a new product or technology should be used.
- **Lack of pipeline** – The construction industry thrives on stability. When introducing a new product or technology to the market, businesses need to know how much demand there will be. The lack of a clear strategy for MMC and its use in meeting housing demand led businesses to misinterpret the signals and invest large sums into a product that did not have a concrete delivery strategy from government.
- **Applicability across projects** – MMC was often hailed as a panacea to meeting housing demand. However, its use in reality was limited. Process repetition benefits specific types of projects, such as tall buildings on constrained urban sites. Where projects are more varied, standardisation is more difficult to achieve.
- **Lack of understanding of the product** - The sector does not begin from a position of strong public trust. Past failures when introducing novel construction methods have inevitably coloured the judgement of those outside the industry and it is not clear whether the lessons they provide have been learned. This presents a barrier to trust that must be overcome. The negative perception of MMC presented a major challenge to widespread adoption and firms did not do enough to challenge or change this narrative.
- **Regulatory environment** - In the absence of a coordinating or well-structured overseeing body, the industry faces complexity and often conflict within the broader regulatory framework. The fragmented nature of the construction industry and often competing priorities across companies involved in the building lifecycle presented a challenge to embedding new technology.
- **Coordination** - One of the much-discussed issues about the failure of multiple MMC businesses was the lack of coordination between those working in the factory and those on-site. This led to technical challenges that were difficult to overcome.

CIOB will soon be publishing a full research report into the many failings in the current debate on MMC and its use in volumetric housing. We would be happy to provide further detail on this matter as an example of the risks and barriers to adopting new technologies.

Additional points to consider when understanding the barriers to the widespread adoption of new technologies are included below:

- *Many construction firms operate on a project-to-project basis, therefore, adopting a single new technology which may be applicable on one site, may not make financial sense if they are applied elsewhere.*
- *The upfront costs of trying new technologies or ways of working may be difficult for smaller businesses to justify.*

- *The sheer scale of new technologies on the market makes it hard for businesses to understand where to prioritise their investment.*

Question 76. To what extent are individuals and organisations able to access effective education, training and development to enable them to keep pace with emerging technology, innovation and changing practice?

The education, training and development landscape in construction is complex and often fragmented across numerous professional bodies, training providers, trade associations and public bodies, British Standards, etc.

Ability to access this training is less of an issue as much as there being no central database that organisations can view which points them towards training which is applicable to their needs.

CIOB coordinates all its training and learning resources for construction and built environment professionals through its [Academy](#). The Academy provides a wide range of courses across a variety of subjects including, but not limited to courses in:

- *Construction Ethics and Compliance*
- *Quality in Construction*
- *CIOB Diploma in Building Safety Management*
- *Principal Contractor Competence and Legal Duties*
- *Building Pathology*
- *Commercial Management for Contractors & Subcontractors*
- *Sustainable Construction and Development*
- *Innovation Zone*

CIOB's Academy is a market leader and places importance on helping construction managers to demonstrate they are a talented and diverse workforce, making a real and positive difference to global challenges in the built environment.

However, while these resources represent best practice and are led by experts in various fields across construction, raising awareness of the breadth of resources that the Academy provides to the wider construction industry is challenging.

- ***Recommendation** – The government should draw together all of the learning and education resources across the raft of professional and trade bodies into one single source so that SMEs and other individuals who may not currently be members of a professional or trade body can have a place to go to find the training they need. This could be a function of the future Single Construction Regulator.*

Question 77. Are there examples of good practice from other sectors or countries in relation to the themes raised in this call for evidence, that we should consider in developing a new strategy for the built environment professions, trades and occupations?

CIOB is not an expert on the regulatory frameworks or guidelines of other sectors. However, in identifying the many challenges that the UK construction industry faces we have consistently heard from members and sector experts of examples where good practice can be found.

In highlighting these areas, CIOB is not endorsing that these models be used to create a future regulatory framework for construction.

1. **UK Healthcare** – As the General Medical Council sets out “Doctors must regularly demonstrate that they’re keeping their skills and knowledge up to date. This process is

called revalidation and takes place every year. Every licensed doctor must revalidate to show they are fit to practise and maintain their licence to work in the UK.” Revalidation in this context works similarly to the CPD requirements of professional bodies like CIOB in that it supports doctors in reflecting on their practice, improve their care, ensure that patients have confidence that their doctors are up to date and provides assurance that doctors are regularly checked by a senior doctor. This consistent checking and validation provide a mark of competence over time which should be seen as admirable.³

2. **UK Civil Aviation Authority** – This sector provides a good example of the culture that can be created through good reporting. The UK Civil Aviation Authority has successfully implemented mandatory occurrence reporting through its ‘Just Culture’ principles. These create a culture where “people are treated fairly and not punished for actions, omissions or decisions that are commensurate with their experience and training. The aim of a Just Culture is to promote continuous learning from previous mistakes and to encourage pilots to share safety related information.” Procedures make clear that gross negligence, wilful violations and destructive acts will not be tolerated but mistakes can be made and that by incentivising openness and learning and not focusing on punishment a more positive atmosphere and sense of accountability is created.⁴

Finally, it is worth highlighting the contractor licensing systems in New South Wales and Queensland which include regulatory powers such as licence checks, compliance audits, investigations and site inspections to improve compliance and raise standards across the construction industry.

Australia is also moving towards more consistent engineering registration across its states and territories in response to fragmented licensing arrangements and growing expectations for stronger professional accountability, following recommendations from the [Building Confidence Report](#).

Question 78. Based on your experience of previous attempts at reform, what are the 3 most important insights or considerations we should seek to reflect in designing a new strategy for the built environment professions, trades and occupations?

While it is useful to consider three key focus areas when examining previous attempts at reform, the issues and challenges that our industry has faced are multifaceted and intensely complex. Therefore, all evidence should be considered provided throughout this response and all responses received to this consultation.

1. **Construction Business Model** – The business model in construction, where firms compete for small profit margins and are evaluated based on low-cost, quick returns, is a fundamental barrier for comprehensive reform to the industry. This mindset also presents the most pressing barrier to competence. Competency should be led from the top, by clients or by large firms with the resources available to upskill and embed best practice into their processes and procedures. In doing so, competence can filter down through the industry, through procurement and tendering processes to contractors and sub-contractors.
2. **Regulatory Complexity and Change** – The many attempts at reforming some or all of the construction industry and wider built environment have caused harm to confidence and clarity. While many reforms have been well intended, the constant change, such as

³ General Medical Council, [What is revalidation?](#)

⁴ UK Civil Aviation Authority, [Occurrence Reporting for General Aviation](#), December 2023

those to the National Planning Policy Framework (NPPF), the advent of the Building Safety Regulator and Building Safety Act 2022 and Future Homes Standard have been damaging to setting business priorities and future planning. The criticism that is often levied at government is that many of these changes have been implemented without participation from the industry and without an acknowledgement of the disconnected nature of construction firms and employees. We would advise that, when a strategy becomes clearer for the future of building professions, that MHCLG and the wider government structure does all that it can to involve as much of the industry as possible and clearly and consistently communicates that changes to process that regulatory reform would involve.

3. **Diversely Spread Nature of the Industry** – As noted throughout this consultation, the widespread nature of construction will need to be a key consideration in future reforms. The industry is predominantly made up of SMEs and micro-enterprises, many of whom will not engage or be aware of upcoming changes at a regulatory level until they happen. Many of the barriers to the successful delivery of the new building safety regime in England have arisen because of individuals or companies not being aware of changes or believing that they do not apply to them. A comprehensive communication piece will need to be undertaken with industry to ensure this is not repeated. Simultaneously, while professional and trade bodies cover large parts of specific professions and roles, the reality is that this is only a small portion of the industry. Without a full understanding of who works in construction, what roles they fulfil and their level of expertise, significant reform will be difficult. Government should seek to create more comprehensive data sets, which are publicly available, understanding the full picture of construction. This will help guide policy, allow professional bodies to target previously uncovered parts of the industry to improve competency and allow for a greater level of scrutiny about how we understand and categorise construction work.

Question 79. Are there any other final points you wish to make which are not captured elsewhere in your response to this call for evidence?

There are a few additional points that we want to raise at this stage. Both points below were also covered in additional stakeholder questions which were sent to CIOB, and which form key parts of our evidence:

- **Future Skills and Horizon Scanning** – CIOB has undertaken numerous exercises examining the future predicted skills needed in the construction industry. This relates both to the number of new entrants and the skills they need to be equipped with. The following provide useful data and feedback on this issue:
 - [Attitudes Towards Construction Careers 2026](#)
 - [The SME State of Trade Survey, July to December 2025](#)
 - [The SME State of Trade Survey, January to June 2025](#)
 - [CIOB's Skills Gap Research 2024](#)
 - [The Real Face of Construction 2023](#)
 - [CIOB's Response to the Young People and the Built Environment inquiry](#)
 - [CIOB's Response to the Centre for Social Justice Skills to Build inquiry](#)
- **Data in Construction** – Decision making is reliant on good information and reliable data, a point that we have made consistently in this response. The construction industry is rapidly improving its capacity to collect, process, and exploit data. However, available data covering the construction market in all its aspects is patchy. Key data on output, orders, and prices is provided by government and the Office for National Statistics (ONS). However, other than going digital, there has been little progress since they were provided on paper.

Multiple private businesses deliver construction data, information, and research, but relative to many other industries these services are of variable quality and coverage. This is understandable given construction boasts the highest number of SMEs compared to any other industry sector in the UK and therefore many lack the budgets, knowledge and experience to utilise market information. The complexity of construction and the built environment make collection, collation, and comparisons of data harder than for most industries. So, we should expect that it lags in terms of sophistication. But the shortage of high-quality construction market information means that major decisions often rest on precarious data points.

Furthermore, the confusion between the definition of construction in official statistics and what people perceive it to be hampers the interpretation of much of the available data. The official data on 'construction' does not include many businesses critical to the creation and maintenance of the built environment, such as construction-related professions, materials manufacturers and specialised plant and machinery hirers. The CIOB and others have called for the establishment of 'satellite accounts' for the wider construction sector. Satellite accounts would be a powerful tool towards building a better understanding of the progress and impact of construction. The Office for National Statistics (ONS) produce satellite accounts for tourism, and the former Department of Culture, Media, and Sport (DCMS) produced simple satellite accounts to track the creative industries.

As part of this process, CIOB is also reviewing our own data to better understand the roles and functions of our membership as well as the numbers performing safety critical roles in the sector.