

ASSA ABLOY Opening Solutions UK & Ireland response to MHCLG Building a Safer Future: Implementation Plan



1. Introduction

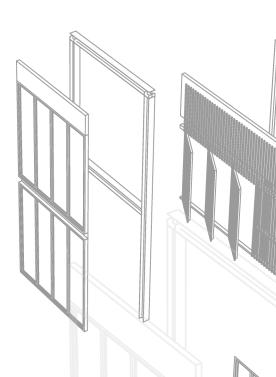
"What makes a place feel like home? Above all, regardless of who you are or how much you have, it is somewhere where you feel safe."

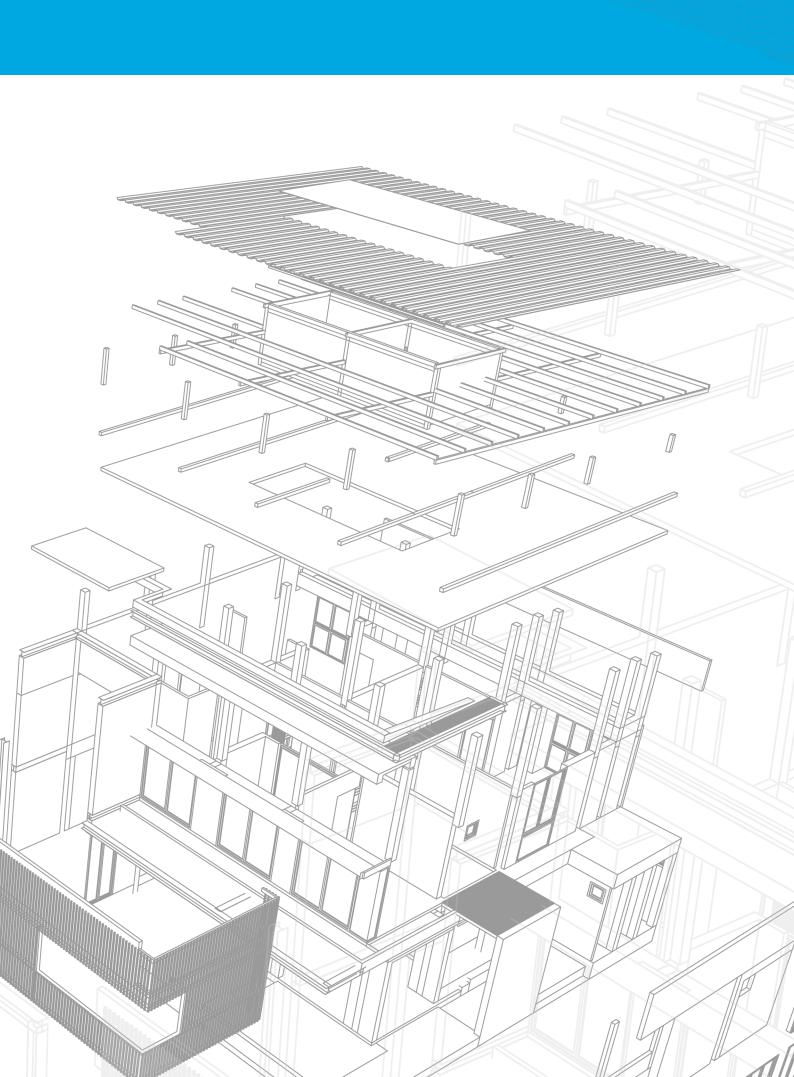
Rt Hon James Brokenshire MP, Secretary of State for Housing, Communities and Local Government

In the aftermath of the Grenfell Tower fire, it became apparent that a complete review and reform of the building and fire safety regulatory system was needed. In May 2018 the results of an Independent Review of Building Regulations and Fire Safety, led by Dame Judith Hackitt, were published. Following this, Dame Judith Hackitt called upon the Government to "develop an implementation plan that will provide a coherent approach to delivering the recommendations in her Review."

The Building a Safer Future: Implementation Plan, from the Ministry of Housing, Communities and Local Government (MHCLG) is that plan, which sets out how Government and the industry will achieve the systematic overhaul required to improve building and fire safety. Following the publication of the Dame Hackitt review, ASSA ABLOY Opening Solutions UK & Ireland produced its own whitepaper in support of many of the suggestions made, but also calling for greater clarity and an extension of the scope to cover all buildings. The implementation plan, addresses many of the points raised by ASSA ABLOY Opening Solutions, which will be fundamental to achieving a safer built environment and the effective enforcement of construction product safety.

The plan sets out a statement of intent from the Government for construction and manufacturing industries. Its comprehensive approach to fire safety products will ensure that, through third-party certification, standards and safety requirements are integral, not just at the manufacturing stage, but during installation, inspection and ongoing maintenance.





2. Scope of Implementation Plan

a. Extending the scope of the report beyond high rise

"The majority of stakeholders said that the scope should extend beyond multi-occupied residential buildings of 10 storeys or more. Many respondents argued that the regime should address other buildings where a significant fire could put many people's lives at risk. The Government will consult in spring 2019, on proposals for the range of buildings that should be in scope of the new regulatory framework."

Statement from The Building a Safer Future: Implementation Plan

"In the future, we would like to see the scope of these recommendations extended. Fire safety should be regarded with critical importance across all building types."

Statement from ASSA ABLOY Opening Solutions whitepaper on The Independent Review of Building Regulations and Fire Safety

ASSA ABLOY Opening Solutions is pleased the Government will be reviewing the scope of the regulations beyond residential buildings of multiple-occupancy above 10 storeys. Whilst it recognises that high rise residential buildings are often at more risk of fire, safety should be paramount across all buildings and the correct resource should be allocated accordingly. If fire and safety regulations are not consistent across all building types, then it still leaves some building users at risk and vulnerable within their homes and places of work.



b. The importance of third-party certification

"The testing of products that are critical to the safety of HRRBs should be subject to independent third-party certification. Test methods and standards should be maintained under a periodic review process in order to drive continuous improvement and higher performance through the development of new test methods, and encourage innovative product and system design under better quality control."

Statement from The Building a Safer Future: Implementation Plan

"Testing and certification of all products that can impact on fire safety should be mandatory and through independent, third-party testing, this process can be audited and maintained to the highest standards."

Statement from ASSA ABLOY' Opening Solutions whitepaper on The Independent Review of Building Regulations and Fire Safety

The implementation plan has identified the need to "work with industry to develop minimum standards for third-party certification schemes" and that these schemes should cover "manufacturing, installation and inspection of products." ASSA ABLOY Opening Solutions has always supported this view and believes third-party certification will contribute toward consistent legislative powers covering construction products and its ongoing enforcement.

Increasingly, more Building Regulations require third-party certification for effective performance, therefore under the review of Approved Document B the introduction of third-party certification should be considered as a critical inclusion.



c. Professional accreditation for installation and ongoing maintenance

"Industry has formed a Competence Steering Group to develop proposals for an overarching competence body and competence framework for all trades and professions working on highrise residential buildings."

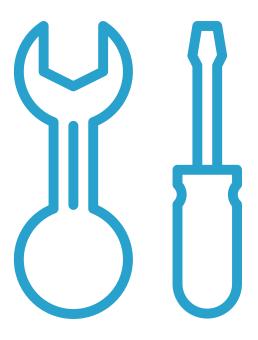
Statement from The Building a Safer Future: Implementation Plan

"Testing should be carried out by a qualified person, not a 'responsible person'"

Statement from ASSA ABLOY Opening Solutions whitepaper on The Independent Review of Building Regulations and Fire Safety

The Government will review suggestions put forward by the Competence Steering Group in April 2019 and make recommendations on whether legislation should be introduced to underpin any new system in order to ensure compliance.

Fire safety is only properly maintained if standards and checks are carried out throughout the life cycle of the product and building. This is best addressed through regular inspection, maintenance and the replacement of products. The success of regular inspections and ongoing maintenance in upholding fire safety relies on individuals being well-trained. As a critical component in the overall safety of a building, training should be up to standard and regulated, so skills can be certified and assessed.



d. Maintaining the original specification, prioritising safety over cost ongoing maintenance

The implementation plan sets out the intention to "work with procurement professionals across the public and private sectors to develop standards and disseminate procurement best practice that prioritises safety outcomes."

Statement from The Building a Safer Future: Implementation Plan

"The performance of all equipment, no matter its use, depends on it being correctly specified, installed and maintained. This is particularly vital in the case of safety equipment, where the consequences of failure can be deadly. Specifications should be fit for purpose, as well as ensuring that they are implemented correctly when a building is designed, when it is built and when it is being maintained."

Statement from ASSA ABLOY Opening Solutions whitepaper on The Independent Review of Building Regulations and Fire Safety

It is well known that compromising on the specification can impact the operational safety of a building, but with no system to ensure compliance, it is too easy to deviate from the recommended specification. More education is needed on the cost savings vs. the safety impact and overall lifetime consequences of substituting products, but more importantly policies and practices need enforcing which police this and hold everyone accountable within the construction process.

The drive to reduce cost must not be allowed to compromise the safety performance of a building.



e. The importance of digital labelling and traceability

"Government should mandate a digital (by default) standard of record-keeping for the design, construction and during the occupation of new HRRBs." Under the implementation plan the Government has committed to "work with the construction products industry to develop a consistent labelling and traceability system that supports the creation and maintenance of the golden thread of building information."

Statement from The Building a Safer Future: Implementation Plan

"We believe that data sharing through digital test records for fire doors, as well as the widespread adoption of Building Information Modelling (BIM), will form an important part of maintaining specifications and ensuring safety."

Statement from ASSA ABLOY Opening Solutions whitepaper on The Independent Review of Building Regulations and Fire Safety

To aid the auditing and ongoing inspection of fire safety products, data should be held electronically, providing evidence of third-party certification, inspection records and performance related information. Approaching this as a digital first process, makes it more streamline, less resource intensive and limits the risk of human error.

ASSA ABLOY Opening Solutions UK & Ireland Door Group, has already begun the process of digitally labelling all its doorsets to provide greater transparency and full traceability. Our doorsets will be traceable from design, through to manufacture, supply, installation, inspection and maintenance.



f. Time for standards and regulations to be more flexible

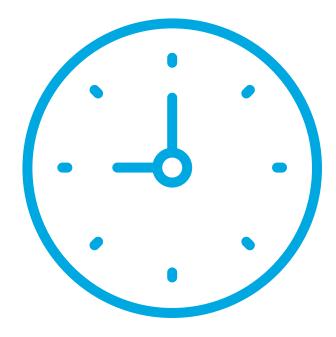
We will drive further improvements to standards by, for example, reviewing and responding to the industry working group's proposals to improve competence across the sector, including setting out whether we should legislate to underpin these proposals."

Statement from The Building a Safer Future: Implementation Plan

"There is a need for any new standards to be flexible and agile enough to adapt to the changing needs of buildings, construction processes and product developments. Regular updates, rather than full revisions, should be implemented to ensure standards are fit for purpose and reflect the current social and physical landscape."

Statement from ASSA ABLOY Opening Solutions whitepaper on The Independent Review of Building Regulations and Fire Safety

In addition to the agreed review of Approved Document B, there is more of a general need for Standards and Building Regulations to be updated regularly to reflect changes within the industry. It is only through correct and relevant legislation that we can ensure the highest and safest building standards are maintained, and this requires a more responsive and flexible approach to updating and implementing standards and regulations.



3. The role of Building Regulations in achieving a safe built environment

Ultimately, to achieve a safer built environment for the long term, the following principles need to be upheld and integral to our approach moving forward:

- a. Consistent legislative powers covering construction and safety products
- b. The effective enforcement of construction product safety

The implementation plan has already highlighted measures that will significantly contribute toward these aims, the critical areas being:

- a. Third-party certification it is only through a comprehensive and audited certification system that we can achieve consistency of implementation through legislation. This also provides an agreed level by which all safety products are inspected and maintained.
- **b. Updated Building Regulations** the Building Regulations must be updated to include the recommendations within the report, ensuring the enforcement of construction product safety. This will provide the industry with greater clarity.
- **c. Better monitoring, control and enforcement mechanisms** professional accreditation, the introduction of digital labelling and ongoing inspections will make monitoring and controlling the standard of safety products deliverable in practice and a long-term solution, rather than a quick fix.



4. Summary

Key statements of intent

- 1. Potential to extend the scope of the review beyond multiple-occupancy high rise buildings
- 2. Enforcement of third party certification at every stage, from manufacturing and installation to inspection and ongoing maintenance
- 3. Accredited professionals to perform installation and ongoing maintenance
- 4. Effective enforcement of the original specification, to avoid the replacement of certified products with products not proven to be fit for purpose
- 5. The implementation of labelling and digital traceability on all fire safety products
- 6. A more streamlined and flexible process for adapting standards to current industry, environmental and socio-economical needs

ASSA ABLOY Opening Solutions UK & Ireland believes the implementation plan has stayed true to many of the recommendations outlined in the original review. It is encouraged by the recognition of the importance of third-party certification and the need for legislation to cover fire safety products throughout the lifetime of a product and building.

The industry must now provide guidance and support to realise these plans.

ASSA ABLOY Opening Solutions UK & Ireland can help support building specifiers and owners in complying with the latest standards and the recommended changes in the Implementation Plan, through its wide range of product solutions and services.

Our Openings Studio™ service can help streamline the data sharing process throughout the entire project lifecycle, by acting as a collaborative tool for all project stakeholders involved – from the initial design, through to construction, delivery, asset management and beyond. This is not only aligned to plans for digital record keeping but also ensures specifications are not broken during the build process.

The software, suitable for all building projects and applications, provides product information and performance data to ensure building regulations are adhered to, while 3D views guarantee full design integration.

To schedule a demo of Openings Studio™ 3.0, please visit https://www.assaabloy.co.uk/en/local/uk/obsolete/specification-bim/contact/

The ASSA ABLOY Group is the global leader in access solutions. Every day we help people feel safe, secure and experience a more open world.



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