



CIBSE response to MHCLG Call for Evidence: Strategy for the built environment professions, trades and occupations

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Executive summary

1. CIBSE (the Chartered Institution of Building Services Engineers) welcomes the Government's ambition to develop a long-term strategy for the built environment professions, trades and occupations. This response is built on evidence gathered from across CIBSE's membership and technical expertise – spanning the design, delivery, operation and maintenance of buildings. The framing of our response has also been shaped by CIBSE's Council and dedicated Building Safety Group, drawing on decades of combined safety-critical engineering leadership across the built environment.
2. Responding to the specific questions posed in this Call for Evidence (CfE), our submission points to four consistent conclusions:

The UK's professional competence infrastructure is strong and should be built upon

3. The UK already has well-established, internationally recognised professional competence infrastructure, delivered through Professional Engineering Institutions (PEIs) such as CIBSE – registration, accreditation, certification, continuing professional development (CPD), technical guidance and independent standards. The priority for this strategy is coherence and better connection across what already exists, not parallel structures or duplication.

The most significant risks sit at the transitions between lifecycle stages, not within individual disciplines

4. Across every part of our response, evidence points to technical depth within professions rarely being where things go wrong. The material failures cluster at the handover points – pre-design to design, design to construction, construction to operation. This is where information, accountability and continuity are lost. A strategy organised stage by stage will miss this. A strategy that treats transitions as a distinct, named risk will not.

Organisational capability and measured building outcomes matter as much as individual competence

5. Competent individuals still produce poor outcomes inside organisations that lack the governance, resourcing or leadership to support good judgement. Equally, professional success should be measured by how buildings actually perform once occupied, not by design intent or compliance alone. The evidence in this response shows real-world projects achieving measurably better outcomes where performance was targeted, verified and held to account. If the strategy is to meet its own proposed outcomes, tying competence to real-world building performance for end-users should be a priority.

Voluntary schemes will not achieve the coverage or consistency this strategy needs

6. Independent, well-designed voluntary competence schemes, such as the Higher-Risk Buildings (HRB) register and the Government's own Soft Landings framework, have separately failed to achieve meaningful coverage, even where industry broadly supports their aims. The lesson is not that these frameworks are poorly designed, it is that voluntary adoption does not work at scale. Where Government is serious about consistency, proportionate mandating of competence requirements will close a gap that guidance alone cannot.
7. Taken together, this evidence points to one underlying argument: competence, organisational capability, accountability, procurement, operational performance and building safety are not separate policy challenges. They are a single, interconnected system and the transitions between its parts are where this strategy will succeed or fail. CIBSE sets out, supported by the principles endorsed by our Council (which close this response) how we believe the current system should be strengthened.

About CIBSE

8. CIBSE is the professional body for building services engineering, licensed by the Engineering Council, with more than 24,000 members globally. Our members design, deliver, commission, operate and maintain the systems that determine whether a building is safe, healthy, sustainable and performs as intended – working at the interface between architecture, structural engineering, construction and operation throughout a building's life.
9. CIBSE operates a professional registration scheme which is a tiered, competency-assessed pathway, rather than a single credential. Our four membership grades map directly onto [Engineering Council registration](#), from Licentiate (Engineering Technician) through to Member and Fellow (Chartered Engineer), each assessed against defined competency criteria. Where a professional has the practical experience but lacks formal qualifications, our [Experience Route](#) provides an alternative path to registration based on demonstrated competence, so capable practitioners are not excluded on qualifications alone. CIBSE is also an approved assessor for the Engineering Council's [HRB register](#), giving us direct, current experience assessing competence against the highest-risk category of building this strategy is concerned with.
10. This registration infrastructure sits within a wider system CIBSE actively maintains. We:
 - accredit academic programmes and act as an approved end-point assessor for apprentices, shaping the skills pipeline at its source;
 - operate independent certification schemes and specialist registers, assessed against defined standards with mandatory CPD and periodic reassessment rather than one-off qualification;
 - approve in-company training and development schemes, extending registration-quality competence assurance directly into employers;
 - set CPD expectations for every member's career and monitor delivery on a sample basis – a proportionate, risk-based model consistent with the approach we recommend in this response; and



- administer live operational performance frameworks such as [NABERS UK](#), publish [technical guidance and standards](#), and convene technical expertise to support industry, regulators and governments on a global scale.
11. CIBSE also takes an active role in equity, diversity and inclusion (EDI) across the profession, primarily through our standing [EDI Committee](#). We set out further details on our EDI work later in this response, given its direct relevance to the strategy's workforce ambitions.
 12. Taken together, this is not a claim that CIBSE's or other existing PEI frameworks alone are sufficient to meet the strategy's ambitions, but evidence that much of the infrastructure the strategy needs already exists, is operating today, and is available for Government to build upon, rather than replicate.

Response to CfE questions

13. CIBSE has structured this response around the interconnected nature of professional competence across the building lifecycle, rather than the CfE's original question order. Where the CfE asks substantially similar questions at different lifecycle stages, we have addressed them together and identified the relevant question numbers throughout, giving a single, coherent argument, rather than repeating the same evidence multiple times.

Skills, knowledge & experience

Responding to questions – 1, 2, 3, 18, 19, 20, 35, 36, 37, 53, 54 & 55

14. CIBSE believes that professional competence extends beyond technical expertise. Delivering safe, healthy and high-performing buildings requires practitioners who can apply engineering judgement, collaborate effectively across disciplines, understand the interactions between building systems and make decisions based on whole-life building performance, rather than simply achieving minimum regulatory compliance.
15. The built environment is becoming increasingly complex. Decarbonisation, climate resilience, digital engineering and evolving building safety requirements all demand broader and deeper competencies than have traditionally been expected. Professionals must therefore possess not only specialist expertise but also an understanding of how decisions taken at one stage of the building lifecycle influence safety, operational performance, occupant wellbeing and environmental outcomes throughout its life.
16. Across the UK, there are many examples of world-leading professional expertise and excellent engineering practice. However, CIBSE considers that the capabilities required to deliver consistently safe, healthy and high-performing buildings are not demonstrated uniformly across the sector. Variability is driven less by an absence of technical knowledge than by differences in organisational capability, capacity, client maturity, multidisciplinary working and the application of professional judgement.
17. For each stage of the building lifecycle, this section sets out the skills required, where the most material gaps lie, how consistently these are demonstrated, and the actions we believe would have the greatest impact.

Pre-design

18. The pre-design stage establishes the strategic foundations upon which all subsequent decisions depend. Competence at this stage extends beyond technical design knowledge and includes the ability to define clear performance outcomes, understand whole-life value, identify and manage strategic risks, and commission appropriate multidisciplinary advice from the outset.
19. CIBSE members report that building services expertise is routinely brought into projects too late, after key spatial and cost decisions have already been fixed. Underfunding of the pre-design stage is a persistent driver. Clients and their advisors often underestimate budgets (sometimes to protect fees or simply to keep a scheme moving) which entrenches value engineering – often, in practice, cost reduction rather than genuine engineering re-evaluation – as the primary tool for closing the gap later, at far greater cost than getting the brief right the first time.
20. The mismatch is stark at the design-to-construction interface: a design team may work on a project for two years or more before tender, yet contractors are routinely expected to fully understand, price and take on design responsibility within six to eight weeks, a timescale that all but guarantees risk is passed down the supply chain to those with the least time, budget or authority to manage it.
21. Where pre-design is done well, the evidence is clear and measurable. [Globe Point](#) in Leeds set a NABERS UK Design for Performance target at the outset and underwent independent review throughout, going on to achieve a 4.5-star rating and an EPC A – with judges praising the team's ability to demonstrate performance in use, not just at design stage.
22. [11 & 12 Wellington Place](#) shows the same pattern: it became the first UK new-build office to achieve a 5-star NABERS UK Energy Rating, through detailed performance modelling carried out before construction, continuous monitoring and in-use verification after handover. Both projects demonstrate that setting a measured performance target – and holding the project to it – is achievable now, on live schemes. Whilst such schemes are already demonstrating value today, they remain voluntary in the absence of any national regulatory requirement, meaning take-up of such schemes are not driving competent outcomes at the pre-design / design stage.
23. The Government's own [Soft Landings](#) framework, mandatory for public procurement since 2016, was designed to address exactly this gap between design intent and operational reality. Its low uptake, even within Government's own estate, suggests the barrier is not the absence of good frameworks but a lack of incentives and enforcement. From CIBSE's perspective, the most significant capability gap at pre-design is therefore not technical design knowledge, but the ability – backed where necessary by regulatory requirements – to set measurable performance outcomes early, resource the pre-design stage adequately, and hold the whole team accountable for delivering against them.
24. Skills gaps at this stage have a negative impact on the Government's stated outcomes: weak pre-design capability is where the "safe, high-performing and sustainable"

outcome is most cheaply protected and most expensively repaired if missed, since decisions made here are the hardest and costliest to reverse later in the lifecycle. To address this, we suggest professionals signing off design-stage performance predictions should be required to hold recognised assessor competence, and their sign-off tested against post-completion measured outcomes.

Design & specification

25. The design stage requires multidisciplinary technical expertise combined with the ability to coordinate increasingly complex building systems. Competence includes developing integrated designs that balance safety, energy performance, resilience, maintainability, buildability and occupant wellbeing while ensuring compliance with relevant legislation and standards. CIBSE's [Commissioning Code M](#) is a useful reference point for our evidence base in this section.
26. CIBSE members consistently identify a specific and correctable gap: designers frequently lack the expertise to properly integrate specialist products into a coordinated design. In practice, responsibility for that integration is often pushed onto individual manufacturers after procurement, by which point it is too late to influence the design meaningfully, and the manufacturer has neither the visibility of the whole building nor the accountability for how their product interacts with everything else in it. This is a training and process gap, not a competence failure on the part of any individual discipline and sits in the "systems thinking" weakness our members identify throughout this response.
27. 11 & 12 Wellington Place (see above) demonstrates what good coordination looks like in practice. The 5-star NABERS UK Energy Rating it went on to achieve in operation was underpinned by detailed performance modelling carried out during design, not retrofitted after the fact. This is the "measured operational outcomes over design intent" principle set out in our pre-design evidence, applied one stage further down the lifecycle, and it reinforces that the two stages should not be treated as separable in the strategy, since the discipline established at design stage is what makes performance achievable later.
28. CIBSE's own certification schemes – including [Low Carbon Consultant](#), [Whole Life Carbon Assessor](#) and [NABERS UK Assessor](#) – provide a working model of what independent, ongoing competence assurance looks like for design-stage specialisms. Assessment against a defined standard, mandatory CPD, and periodic reassessment, rather than a one-off qualification. This is offered not as a claim that CIBSE's schemes should be adopted wholesale, but as evidence that this model of certified roles and assurance is deliverable in practice, and consistent with the outcomes this strategy is seeking to achieve.
29. Skills gaps here have a negative impact on the "safe and high-performing" outcome, since failures between design and product integration are where safety-critical risk accumulates. The independent certification model set out above applies equally here – it specifies competence and closes the loop between design intent and verified outcomes.

Construction

30. Construction work requires competencies beyond installation skill – site management, building safety knowledge, quality assurance, commissioning and testing, verification and inspection, digital information management and contract management. As building systems grow more complex, CIBSE's members increasingly emphasise the importance of competence in building services engineering systems, controls integration and digital commissioning. All skills that determine whether a technically sound design is delivered as intended.
31. The most material gaps are concentrated at this point: commissioning and testing, verification and record-keeping, digital information management, and building services systems integration. CIBSE's own [TM61](#) research on operational performance, and its wider work on the [performance gap](#), show that even a technically robust design can fail to deliver on safety, energy performance or occupant comfort, where installation and commissioning are weak or incomplete. Government's own analysis reaches the same conclusion: its earlier iteration of the Future Homes and Building Standards consultation attributes the residential performance gap in part to fixed building not being installed and commissioned correctly.
32. Consistency remains variable, and the variation is structural rather than random. Larger contractors typically operate structured training, competency frameworks and quality assurance systems. Smaller organisations and fragmented supply chains show greater variability. Across the sector as a whole, competence in traditional construction trades is generally stronger and more consistently demonstrated than in specialist areas such as building services systems, commissioning and digital information management.
33. The independent, on-site verification this gap points to is not a new idea for the sector. The near disappearance of [Clerk of Works](#) roles, which historically provided dedicated independent inspection through construction, is frequently cited across the industry as a loss of quality assurance capacity, particularly for identifying defects that would not be visible from documentation or self-certification alone. CIBSE's recommendation for independent, competency-assessed commissioning verification is, in this sense, a targeted revival of a role the sector already understand the value of.
34. Skills gaps in commissioning and digital handover have a negative impact on the Government's stated outcomes, because they undermine the "safe, high-performing" outcome directly (buildings not performing as designed) and the "trusted" outcome indirectly (defects and performance shortfalls surface after completion, when responsibility is hardest to trace). **Embedding independent, competency-assessed commissioning verification as a standard requirement (in our case, for building services systems specifically) could address these skills gaps, and CIBSE would encourage Government to look again at the Clerk of Works role as one that has worked successfully in the past.**

Occupation & maintenance

35. Occupation and maintenance work draws on a wide range of technical, managerial and operational competencies – facilities management, asset management, building

services maintenance, operational energy management, building safety management, occupier engagement, digital information management and lifecycle planning.

Understanding how a building was designed to perform, not just how to keep it running day to day, is increasingly important, and goes to the heart of this proposed strategy.

CIBSE's [Guide M](#), primarily for Facilities Managers, is a useful reference point for our evidence base in this section.

36. The most material gaps sit in building performance optimisation, building services systems understanding, information transfer and handover, data analytics and performance monitoring. Many operational teams inherit buildings without complete records, adequate operating guidance, or clear information about original design intent, which makes buildings materially harder to run safely and efficiently.
37. Wellington Place shows what the alternative looks like – its 5-star NABERS rating depended on operational teams actively using continuous metering and analytics data, not just monitoring energy bills after the fact. This is evidence that where operational data skills exist and are properly resourced, they translate into measurable performance and better outcomes for occupants.
38. Consistency is similarly variable. Large asset owners, public sector organisations and specialist facilities management providers often demonstrate strong capability and governance. However, the wider market is more mixed, particularly where operational teams are under-resourced or where design and construction teams fail to transfer adequate information. As building complexity increases and regulatory expectations evolve, the competency bar for operational teams is rising faster than the market's capability.
39. This has a significant impact on the "high-performing and sustainable" outcome, since operation is the longest stage of a building's life and where most of its lifetime energy and performance outcomes are determined. Yet it is where skills investment and monitoring rigour are perhaps weakest relative to capital project delivery. Building on existing Golden Thread principles here is key. **There is also a need to build operational data and analytics competence into standards and training (e.g. for facilities managers) alongside rebalancing development towards operating, maintaining and assuring existing buildings.**

Summary – skills, knowledge & experience

40. This response's evidence on skills confirms the pattern set out at the start of this document: the most material gaps sit at the transitions between lifecycle stages, not within individual disciplines. What that means in practice for skills specifically, is that closing these gaps is less a matter of adding new technical training than of ensuring measurable outcomes are set early, that commissioning and handover are treated as competencies in their own right, and that information moves cleanly from one stage to the next. **If CIBSE were to identify the single change with the greatest impact on skills, knowledge and experience across the whole lifecycle, it would be shifting the sector's default from assessing competence through design intent and qualification alone, to assessing it through measured, verified performance at key handover points.**



Behaviours, conduct & culture

Responding to questions - 4, 5, 21, 22, 38, 39, 56 & 57

41. CIBSE considers behaviours, conduct and culture to be fundamental components of professional competence. Technical knowledge and experience alone cannot deliver safe, healthy and high-performing buildings if individuals and organisations operate within systems that discourage collaboration, constrain professional judgement or reward short-term commercial outcomes over long-term building performance. For each stage of the building lifecycle, this section sets out what most influences behaviour and decision-making, how consistently positive behaviours are demonstrated in practice, and the actions we believe would have the greatest impact.

Pre-design

42. Behaviour at the pre-design stage is shaped by the commercial conditions a project is set up under. Strong client leadership, clearly defined objectives and independent competence requirements produce collaborative, transparent decision-making. Lowest-cost procurement, compressed programmes and insufficient design fees produce the opposite – and CIBSE members report this playing out in a specific, avoidable pattern as described above.
43. Positive behaviours are demonstrated inconsistently across the sector. Projects with experienced clients and integrated teams generally exhibit the collaboration and long-term thinking the strategy is looking for. The continued prevalence of lowest-cost procurement across large parts of the industry remains the single biggest barrier to this becoming the norm rather than the exception.
44. Commercial pressure that rewards short-term cost over long-term performance has a significant impact on all of the Government's stated outcomes – it is the mechanism through which good technical standards fail to translate into good buildings. **Requiring publicly procured projects to evaluate bids on demonstrated long-term performance commitments, rather than lowest capital cost alone, could be a meaningful step towards the outcomes this CfE proposes. This will help ensure the professionals delivering projects are not structurally incentivised to compromise judgement for cost.**

Design & specification

45. Clear project objectives, professional ethics, multidisciplinary collaboration and shared information environments produce good design-stage behaviour, because they let architects, engineers, fire specialists, contractors and operational stakeholders make decisions with visibility of how those decisions affect everyone else. Fee pressure, programme constraints and fragmented procurement produce the opposite. CIBSE members raise a further, more specific concern here: that engineers' professional judgement on matters of public health or safety is at times overruled by managers without engineering accreditation or the standing to weigh that judgement properly.
46. Where engineering judgement can be overruled without documented, accountable challenge, the impact on the "safe and high-performing" outcome is direct and

significant. The highest-impact change would be requiring that safety-critical design decisions overruled on commercial or programme grounds be formally documented, with the accountable individual and their reasoning recorded, creating an auditable trail that protects both public safety and professionals.

Construction

47. Competent leadership, effective supervision and clear accountability drive good construction-stage behaviour; programme pressure, cost pressure and supply-chain fragmentation drive the opposite, most visibly through product substitution and inadequate quality control under time and cost pressure. Positive behaviours remain inconsistently demonstrated. Strong outcomes cluster around engaged clients and robust quality assurance systems, while the wider industry continues to experience the effects of fragmented supply chains and variable competency.
48. As previously referenced, CIBSE's members point to contractors being routinely expected to fully understand, price and take on design responsibility within weeks. That timescale not only creates commercial risk, it discourages careful, collaborative decision-making that good construction-stage behaviour depends on.
49. Where safety-critical failures do occur, they cluster between disciplines and trades rather than within any one of them. Other engineering institutions have found that a trusted, confidential reporting culture measurably strengthens learning at these interfaces: the Institution of Structural Engineers (IStructE) and the Institution of Fire Engineers (IFE) operate a CROSS (Collaborative Reporting for Safer Structures) [reporting scheme](#), which allows near-misses and systemic issues to be shared and acted on without individuals or organisations fearing blame. CIBSE is currently considering the merits of operating such a scheme for building services engineers, working with others across the sector.
50. These issues have a negative impact on the "trusted" outcome specifically, since a rushed handover into construction is where design intent is most likely to be compromised. **Actions could include establishing minimum programme periods for contractor assessments that are proportionate to the project's complexity. Further, Government and regulators may see merit in looking at how a CROSS-style reporting mechanism could work more broadly across the built environment.**

Operation & maintenance

51. Good asset information, clear accountability and the availability of performance data drive good behaviour in this phase; insufficient operational budgets, poor information transfer at handover and reactive maintenance cultures drive the opposite. Where building owners actively monitor operational performance and invest in maintenance, outcomes are stronger; where maintenance is reactive, outcomes are weaker, more costly, and carry greater risk.
52. Consistency is mixed, and tracks with the same divide found throughout this response – strong performance where lifecycle asset management is embedded, weaker

performance where funding, organisational capability or information quality fall short. This is often because of the handover weaknesses described above.

53. Reactive, rather than planned, maintenance culture has a negative impact on the "high-performing and sustainable" outcome, since it consistently produces worse performance at higher cost over a building's longest lifecycle stage. **This could be supported by stronger facilities management competence frameworks that require demonstrated asset-management practice, not just qualification alone.**

Summary – behaviours, conduct & culture

54. This response's evidence on behaviours is a specific instance of the pattern set out at the start of this document: competent professionals still produce poor outcomes where organisational and commercial conditions don't support good judgement being exercised. Across every stage, the behaviours that most reliably produce good outcomes are the same – clear accountability, early collaboration, and commercial conditions that reward long-term performance over short-term cost. The behaviours that undermine them are also the same – procurement and programme pressure that leaves no time for good judgement to be exercised or challenged. This suggests the strategy does not need a different behavioural intervention for each stage of the lifecycle, but a single, consistent principle applied throughout.
55. Getting incentives right at the outset will not eliminate every failure. Where safety-critical issues do arise, our evidence points to a complementary lever: a trusted mechanism for raising and sharing what goes wrong, without fear of blame, so the sector learns collectively rather than repeating the same failure project by project. If CIBSE were to identify the single change with the greatest impact on behaviours, conduct and culture across the whole lifecycle, it would be to **build demonstrated long-term performance and structured accountability into procurement and programme requirements themselves, so that positive behaviour is what the commercial process rewards by default.**

Accountability & responsibility

Responding to questions – 6, 7, 8, 9, 10, 11, 23, 24, 25, 26, 27, 28, 40, 41, 42, 43, 44, 45, 58, 59, 60, 61, 62, 63 & 71

56. CIBSE believes that clearly defined roles and responsibilities are fundamental to delivering safe, healthy and high-performing buildings. Responsibility should be understood as an enabler of good decision-making rather than solely as a mechanism for assigning liability. For each stage of the building lifecycle, this section sets out the challenges in defining and delivering accountability, how consistently the relevant dutyholders understand and deliver their responsibilities, and the actions we believe would have the greatest impact.

Pre-design

57. The dutyholder regime introduced under Part 2A of the Building Regulations 2010 has meaningfully improved accountability at this stage, but understanding of it is not yet evenly spread. Large public-sector clients and experienced developers generally understand and resource their responsibilities well, drawing on established governance

systems and specialist advice. Smaller and occasional clients (precisely the clients CIBSE members most often flag as underfunding pre-design in the first place) rely more heavily on consultants to interpret what is required of them, and common areas of continuing uncertainty include competency requirements, dutyholder appointments and management of compliance information.

58. Building Engineering Services Association's (BESA) [2025 industry survey](#) of the mechanical, electrical and public health sector supports this view. It found that only 39% of micro and small companies, which together make up the vast majority of the construction industry, are aware of the Building Safety Act at all, and one in five respondents remained unclear on their own roles and responsibilities.
59. Delivery follows the same pattern: it tracks organisational maturity and resourcing more closely than it tracks understanding of the rules themselves. This means better guidance alone will not necessarily close the gap. Multiple stakeholders, complex contractual arrangements and evolving regulatory requirements compound this further on smaller projects, where governance is often least formal, but where it is most needed.
60. Inconsistent client understanding and delivery of dutyholder responsibilities has a negative impact on the "trusted" outcome, since it is clients – not designers or contractors – who set the conditions everyone downstream must work within. One change here could be **requiring evidence of dutyholder competency and resourcing as a condition of planning permission for publicly procured and larger private projects**, rather than treating dutyholder compliance as something assessed only once a project is already underway.

Design & specification

61. Understanding of Principal Designer responsibilities under Part 2A is improving but remains uneven. Larger multidisciplinary consultancies have invested in competence development, governance systems and specialist training. Elsewhere, uncertainty persists around scope of responsibility, competency evidence requirements, liability implications, including how Principal Designer duties relate to pre-existing Construction (Design and Management) Regulations (CDM) in addition to requirements under the Building Safety Act. These complimentary but essentially parallel frameworks are cited regularly as a source of confusion and uncertainty.
62. Delivery mirrors the same pattern as pre-design: strongest where governance, competency frameworks and information management systems are mature, weaker where they aren't, and tied to how much a project's overall structure has fragmented responsibility across multiple parties. Overlapping responsibilities between disciplines, unclear information ownership and design changes during development were the challenges CIBSE members raised most consistently.
63. Confusion between CDM duties, those under Part 2A of Building Regulations and the Building Safety Act has a negative impact on the "safe" outcome specifically, since it is precisely the kind of ambiguity that allows safety-critical decisions to fall between two frameworks, rather than being owned by either. **To address this, the Building Safety Regulator could issue definitive guidance on how CDM and Principal Designer**



responsibilities interact for safety-critical decisions, closing a gap current guidance leaves open to interpretation.

Construction

64. Principal Contractor understanding is improving steadily, again strongest among large contractors that have invested in governance systems and Building Safety Act implementation, and most uncertain around information management requirements and the interfaces with designers. Delivery is linked to organisational culture and leadership – it is strongest where quality and safety are prioritised alongside cost and programme, and weakest under complex subcontracting arrangements, frequent design changes or resource constraints. Product substitution under pressure, flagged by the [Hackitt Review](#), is where this shows up most concretely.
65. Similarly, some licensing or registration schemes exist to address such issues and work well. [Gas Safe Register](#) and [F-Gas certification](#) are the clearest examples, over and above those already mentioned in this response. The common ingredients are independent competence assessment, mandatory CPD and periodic reassessment, not a one-off qualification. CIBSE's own [certification schemes](#) operate on the same principle at specialist level.
66. Where schemes remain voluntary, coverage consistently falls short regardless of how well-designed the framework is. CIBSE made this point directly in its response to the initial SCR consultation, noting that the voluntary HRB register has proven limited in its impact and coverage so far. The pattern is not unique to building safety: the New Homes Quality Board's [consumer code](#) – voluntary and widely regarded as well-designed – still covers only around half the new homes market despite several years of operation, with developers saying they support the principle but will only commit once it becomes mandatory.
67. Fragmented accountability across complex subcontracting arrangements has a negative impact on the "safe" and "trusted" outcomes, because it is the condition under which product substitution and undocumented decisions occur. **The highest-impact change would be requiring documented sign-off, traceable to a named individual, for any substitution of specified building services products or systems during construction – closing the accountability gap. CIBSE would also support extending licensing or registration to other safety-critical roles – including facilities managers, commissioning and verification roles. However, as already documented, such schemes should be mandatory to ensure effective uptake and compliance.**

Occupation & maintenance

68. Accountable Persons' understanding of their responsibilities under Part 2A and the Fire Safety Order is improving but remains at different levels of maturity depending on organisation type. Large housing providers, local authorities and institutional asset owners have generally invested in governance systems, building safety teams and resident engagement processes; understanding is weakest where organisations manage complex legacy portfolios with incomplete historical information. Delivery follows the same divide, and the introduction of the safety case regime and Golden Thread

requirements has driven some positive progress, though most organisations remain on a journey toward full maturity.

69. Legacy buildings deserve particular emphasis here: many have passed through multiple owners, operators and contractors over time, meaning responsibility and information may never have been clearly documented in the first place. This is a materially harder problem than inconsistent understanding of a relatively recent regulatory regime – it is a data and provenance problem that guidance or professional competence alone cannot fix.
70. This has a negative impact on the "safe" outcome for existing higher-risk buildings specifically, since accountability is weakest precisely where risk has had the longest time to accumulate unrecognised.

Senior officer & organisational accountability

71. Clients play a central role in establishing effective accountability throughout the building lifecycle, and the same is true further up the organisational chain: the performance of directors, managers and other senior officers has improved meaningfully since the Hackitt Review and the introduction of the Building Safety Act, particularly within major contractors, housing providers and large consultancies with genuine executive engagement in safety and governance. But this improvement is not evenly distributed – it remains weakest where organisations have the least technical expertise and the fewest resources to dedicate to competency and compliance oversight, which tend to be the same organisations least able to absorb the consequences of getting it wrong.
72. Weak organisational-level competence management has a negative impact across all three proposed outcomes, since it is the underlying condition that allows individual accountability gaps to persist. **The highest-impact change would be requiring dutyholder organisations to demonstrate competence-management processes aligned with recognised quality standards – or indeed through dedicated licensing requirements for critical roles – rather than relying on individual senior officers' personal understanding of current statutory duties alone.**

Summary – accountability & responsibility

73. Two distinct patterns run through this evidence. The first – that voluntary schemes consistently fail to achieve meaningful coverage across the professional workforce – is the incentive gap set out at the start of this document, and this response's accountability evidence (HRB Register and New Homes Quality Board consumer code) is where that finding is most directly demonstrated. The second is a capacity gap, where organisations are large, well-resourced and experienced, understanding and delivery of dutyholder responsibilities are strong; where they are small, occasional, or managing legacy portfolios with incomplete information, they are weaker, and no amount of additional guidance closes that gap on its own. **If CIBSE were to identify the single change with the greatest impact on accountability and responsibility, it would be to shift assurance from individual understanding of dutyholder duties toward organisational demonstration of systematic competence management, so that**

accountability is embedded in how an organisation operates rather than dependent on any one person's familiarity with a regulatory regime.

Cross-cutting questions

Responding to questions – 12, 13, 14, 29, 30, 31, 46, 47, 48, 49, 64, 65, 66, 67, 72, 73, 74, 75, 76, 77, 78 & 79

74. Beyond the skills, behaviours and accountability challenges, several questions in this CfE look at the strength of the infrastructure that supports competence across the sector, how well decisions at one stage translate into outcomes at the next, and issues specific to certain types of work. This section addresses each in turn.

System infrastructure: education, competence frameworks & regulation

75. The UK's underlying system infrastructure – education and training, competence frameworks, and regulatory oversight – is strong in its foundations but remains, at every lifecycle stage, described by the evidence as "in transition". This is the consistent verdict across pre-design, design, construction and occupation, with the direction of travel positive but incomplete at each stage.
76. On **education and training**, provision remains weighted toward regulatory compliance and traditional design approaches, with growing gaps in operational energy performance, retrofit delivery, digital information management and post-occupancy evaluation, precisely the areas that have the most material skills gaps. Apprenticeship and graduate pathways have improved access to the profession, but apprenticeship completion rates, including consistency of uptake across SMEs and infrequent market participants, remains weak.
77. On apprenticeships specifically, CIBSE has concern about Government plans to dilute the end-point assessment process. While we recognise the need to improve apprenticeship placements and offer increased flexibility to employers, this cannot come at the expense of strong external validation of apprentices entering a high-competence and safety-critical workplace – exactly the gap this strategy is trying to close.
78. On **competence frameworks**, professional registration, certification and CPD are well-established mechanisms, but BESA's 2025 industry survey reveals a meaningful gap between belief and verification: around 70% of individuals believe they meet the required skills, knowledge, experience and behaviours, yet only 22% have had this assessed through structured, independent verification. Frameworks exist; consistent application of them does not. CIBSE supports the view that more of the workforce should be registered with an appropriate professional body, which, while it may not of itself deliver higher competence, will act as a clear benchmark for it.
79. On **regulation and oversight**, the Building Safety Act has driven measurable improvement in dutyholder competence and accountability. However commercial pressure, supply-chain fragmentation and skills shortages continue to limit how consistently that improvement is felt across the sector, particularly among smaller organisations. Increased guidance from the BSR where it is most needed (e.g. at the

interface of different regulatory instruments), would help address persistent uncertainty. Recent guidance from the Construction Leadership Council (and supported by the BSR) on the [Gateway 2](#) process, is a good example of addressing a much-needed industry concern in an evolving regulatory landscape.

80. Government should treat system infrastructure as a single, integrated system rather than three separate levers – education policy, competence framework design and regulatory oversight are currently developed largely independently of one another, when the evidence shows their effectiveness depends on how well they reinforce each other. A joint review, led by an organisation such as the Engineering Council or Engineering UK and in partnership with the BSR, could be a practical next step.

Interdependencies & transitions between lifecycle stages

81. This response has argued that the most material gaps in skills, behaviours and accountability cluster at the transitions between lifecycle stages rather than within any one of them. The transition from design to construction (RIBA Stage 4 to Stage 5) and from construction into occupation are the two points of greatest risk, and the same small set of failures recurs at both – incomplete information, unresolved coordination issues, poor commissioning, and insufficient continuity of engagement once responsibility formally passes to the next party.
82. What distinguishes successful transitions is not a different set of skills, but continuity – a common data environment maintained rather than abandoned at handover, commissioning treated as a distinct competency rather than a formality, and structured post-handover engagement (of the kind Soft Landings was designed to provide). Where these are present, the evidence this response has gathered shows measurably better outcomes.

Renovation, maintenance & improvement (RMI)

83. RMI work shows evidence of variability in quality, workmanship and standards, particularly within domestic retrofit and smaller-scale refurbishment where competency requirements and oversight are typically less formal than on major construction projects. CIBSE members report inconsistent installer competence, product substitution, poor commissioning, limited quality assurance and inadequate documentation as recurring issues, alongside inconsistent adherence to standards, weak communication with building owners and occupiers, and often poor coordination between the multiple contractors who often work on the same property over time, without a single party holding overall responsibility for outcomes.
84. Accountability presents a harder problem than other lifecycle stages, where a domestic property has been worked on by multiple contractors over an extended period, often years apart and without shared documentation, identifying who is responsible when something goes wrong becomes difficult even where the will to establish it exists. This is a fragmentation problem specific to the RMI market's structure – small, dispersed, low-documentation transactions – rather than a competence or willingness problem.

85. [PAS 2035](#), the retrofit standard used across publicly funded home retrofit schemes, shows that a structured competence and quality framework is deliverable at domestic scale, but it currently reaches subsidised retrofit only, not the much larger volume of privately commissioned RMI work, where consumers have the least ability to judge quality before paying for it. CIBSE suggests extending PAS 2035-equivalent competence and quality assurance to privately commissioned domestic RMI work, not only subsidised retrofit, given this is where the quality, behaviour and accountability issues are most acute and least visible to the people commissioning the work.

Interfaces that enhance or constrain outcomes

86. The functions that sit across the building lifecycle – planning, building control, project management, independent inspection, competency frameworks, digital information management – can either strengthen the outcomes this response has argued for, or actively undermine them, depending on how well they are coordinated with one another.
87. Where they work well, the effect is genuinely additive: building control providing regulatory challenge, project management providing coordination and accountability, digital information management providing transparency, all reinforcing each other rather than operating in isolation. Where they don't, the same functions produce the opposite – overlapping regulatory requirements, inconsistent interpretation of standards between different bodies, information kept in silos rather than shared, and duplicated assurance activity that adds administrative burden without adding safety.
88. We think there is a role here for the Building Safety Regulator to identify and resolve specific instances of overlapping or contradictory requirements between regulatory and assurance bodies, rather than leaving industry to navigate inconsistency between frameworks on a project-by-project basis.

Healthy buildings and indoor air quality

89. As buildings become more airtight and energy efficient, competence in ventilation, filtration, indoor air quality, thermal comfort and moisture management becomes increasingly important to occupant health, not just energy or building performance. This is an area CIBSE has long-standing technical authority in and is directly relevant to the stated outcomes of this strategy. We would encourage Government to recognise indoor environmental quality as a strategic public-health objective in its own right within this strategy, embedding healthy-building outcomes for occupants in relevant standards, guidance and workforce planning, rather than treating it as a secondary consideration to professional competence and building safety.

The role of sector bodies & regulators

90. Professional institutions and regulators play distinct, complementary roles in supporting competence. This existing infrastructure is an asset, not a gap to be filled by new machinery. Independent, periodically reassessed competence assurance works where it is applied. The opportunity is to build on and better connect this infrastructure rather than duplicate it, recognising professional institutions as delivery partners in achieving the strategy's outcomes. However, different professional bodies operate similar but differing schemes. A new regulator, or this strategy itself, has the opportunity to bring



alignment to these requirements, raising minimum standards consistently across the sector.

Licensing of safety-critical roles

91. CIBSE's evidence on licensing and registration, including the case for mandatory rather than voluntary schemes, is set out in full above; we flag it here as directly relevant to this CfE's interest in licensing models. CIBSE would also support a proportionate revalidation model for professional registration, of the kind discussed in comparators below, reflecting our view that a single point-in-time assessment is no longer sufficient, particularly for safety-critical roles.

Barriers to effective enforcement

92. The barriers to enforcement differ for individuals and organisations but share a common root: enforcement in the current system is largely reactive, triggered by failures that have already become visible. Shifting the evidential burden for enforcement from reactive investigation to independent assessment could help – structured commissioning verification, documented sign-off, and competence records tied to individual roles rather than organisations.

Emerging technology & changing practice

93. BIM, digital twins, building performance analytics and automated commissioning offer real opportunity to close the gap between design intent and operational reality. However, CIBSE's consistent message is that technology increases the need for professional competence rather than reduces it. Interpreting a digital twin's output, or challenging an automated commissioning result that looks wrong, requires the same engineering judgement it always did, applied to a new kind of information and a faster decision cycle. Keeping a competent human in this decision-making hierarchy is vital – a point CIBSE made in the initial SCR consultation (in relation to the role of AI).

Comparators from other sectors & countries

94. Several examples, both international and closer to home, reinforce arguments this response makes on its own UK evidence. Scotland's [Structural Engineers Registration Scheme](#) is a directly relevant domestic precedent: a live, UK-operating example of mandatory professional registration and sign-off for a specific safety-critical discipline, demonstrating that this model is deliverable within the UK's existing legal and professional framework.
95. On measured performance, given this response's finding that verified building outcomes drive better results than design-stage prediction alone, we suggest the strategy draw on verified, independently assured outcome data (such as the NABERS UK scheme) to strengthen professional accountability earlier in the lifecycle.
96. On occupation and maintenance, sectors with strong asset information discipline (aviation, automotive, manufacturing and utilities) offer lessons in safety-critical maintenance, audit trails and planned intervention regimes, closely mirroring the asset-management and performance-monitoring gap this response identifies in occupation and maintenance.

97. More broadly, the medical profession ([General Medical Council](#)), aviation ([Civil Aviation Authority](#)) and nuclear ([Office for Nuclear Regulation](#)) all show that competency assurance, structured reporting cultures, independent oversight and, in some cases, regular revalidation of competence requirements can coexist with high productivity and public trust.

Access, equity & inclusion

98. This response addresses access, equity and inclusion, reflecting the CfE instruction that respondents give this particular consideration, rather than in response to a single question. We address this at two levels: organisational access to training and development, and individual access to the profession itself.
99. On organisational access, CPD and training provision is broad and generally strong, but uptake varies considerably by organisational size and resource. Larger organisations invest in workforce development, while SMEs face constraints of time, cost and capacity that this response has already identified as a driver of inconsistent competence more broadly.
100. On individual access, CIBSE takes an active institutional role. Our [Equity, Diversity and Inclusion Committee](#) is a standing committee of the CIBSE Board, with a remit to take a strategic approach to EDI across the CIBSE community and the wider engineering and built environment sector, propose measurable performance indicators to the Board, and work directly with industry on best practice. It oversees four sub-panels representing under-represented groups within the profession – Women in Building Services Engineering, Minority Ethnic Groups, LGBTQ+, and Neurodiversity – each feeding its priorities back into the Committee and Board. Alongside this, CIBSE's [Young Engineers Network](#) supports those in the first ten years of their career through regional and global networks focused on the professional and soft skills needed to navigate an engineering career, including an annual "30 under 30" award recognising emerging talent.
101. We highlight this not simply to describe what CIBSE does, but because it is directly relevant to the strategy's workforce ambitions. The sector-wide skills shortages this response identifies cannot be met by recruiting narrowly from the same pool the industry has traditionally drawn from. Broadening access to the profession is a workforce capacity question as much as a fairness one, and CIBSE's EDI infrastructure represents existing, resourced capacity Government can engage with directly when developing skills and entry-route policy.

Closing remarks

102. The evidence set out in this response points to one underlying argument: competence, organisational capability, accountability, procurement, operational performance and building safety are not separate policy challenges. They form a single, interconnected system. A decision made during briefing or design does not stay contained within that stage, it persists, often for decades, through construction and into occupation, resurfacing as a defect, a performance shortfall, or an accountability gap long after the people who made the original decision have moved on. The transitions between stages,

not the stages themselves, are where this response has consistently found the greatest risk, and the greatest opportunity for improvement.

103. This evidence, gathered across CIBSE's membership and shaped in its framing by our Council, points consistently toward four principles that we believe should guide this strategy.

- **Principle 1: Competence over credentials.** Professional registration – and this strategy – should balance demonstrable skills, knowledge, experience and professional behaviours alongside formal qualifications. Registration should remain the benchmark for those undertaking defined leadership and accountable roles (including Chartered status for senior engineering leadership and safety-critical roles), while maintaining accessible and diverse pathways into engineering professions. Our evidence on skills bears this out: the most material gaps this response identifies are rarely about technical knowledge and are almost always about the ability to apply judgement, set outcomes, and coordinate across disciplines.
- **Principle 2: Continuous assurance, not one-off qualification.** Competence should be maintained throughout a professional's career through effective and meaningful CPD, proportionate assurance and outcome-focused assessment, both for individuals and for the organisations they work within. Our evidence on accountability shows this: organisational capability, not individual awareness of the rules, is what most consistently distinguishes strong performance from weak.
- **Principle 3: Evolution, not wholesale system redesign.** This strategy can strengthen coherence across the existing landscape without duplicating or replacing arrangements that already work effectively. Professional institutions, regulators and employers each have distinct but complementary roles. Government should build on established frameworks and specialist expertise, rather than creating parallel structures or adding further complexity.
- **Principle 4: Proportionate, risk-based regulation.** Regulatory intervention should be proportionate to the level of risk and responsibility associated with different roles across the built environment, with greater clarity over accountable leadership in higher-risk activities and an outcomes-focused approach that improves public confidence without unnecessary bureaucracy. Our evidence on voluntary schemes is the clearest demonstration of why proportionality must include a willingness to mandate – well-designed voluntary frameworks have failed to achieve the coverage this strategy needs.

104. If this strategy addresses skills, behaviours and accountability as three genuinely connected dimensions of a single underlying system – applying these four principles – CIBSE believes it has a realistic chance of achieving what previous, narrower reforms have not: consistency, not just capability, across the built environment workforce.

105. CIBSE looks forward to continuing to work with Government, regulators and industry partners to support the development and implementation of this strategy. As the PEI for



building services engineering, we are well placed to contribute technical expertise, professional standards, independent evidence and practical support to help deliver lasting improvements across the built environment.