

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
e.g .								
1	CIBSE	Overarching			The BSI comment process tends to identify those aspects of a draft that commentators wish to change, and not to identify those aspects that commentators support and do not wish to see changed during later drafting. Due to the importance of some aspects of the proposed framework we consider it important to identify those aspects that we support and do not wish to see significantly altered or amended. We also wish to begin our comments by emphasising that CIBSE broadly supports the framework. We have submitted a large number of comments because this is such an important standard which needs real attention to detail due to its significance in enabling a change in culture in the construction sector.	CIBSE particularly supports the creation of the overarching framework and in particular the emphasis on Continuing Professional Development and the more formal requirements, and the introduction of the concept of revalidation of competence for those working on the highest risk buildings.		
2	CIBSE	Overarching			This draft standard contains 22 pages of non-normative introductory clauses and 17 pages of normative text. This seems both unusual and unbalanced. Clause 0.3.4 and 0.3.5 through to 0.3.5.5, as well as 0.4 to 0.8 look as though they should sit between the terms and conditions in clause 3 and the core competencies in clause 4.	Review the structure and consider a new normative clause that sets out what is required in a built environment competence scheme document or framework. Seek to provide the reader/user with greater clarity in the structure of the standard.		
3	CIBSE	Foreword	Bulleted list		The BECS steering group and the organisations participating have committed significant tangible and intangible resources to this exercise and should all be recognised and acknowledged in full in the final published document.	List the BECS Steering Group constitution in full.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
4	CIBSE	Foreword and overarching	Para 1		<p>The term “BSI Flex” has caused considerable confusion. Hardly anyone beyond BSI standards development staff has a clue what a “BSI Flex” is. If this is going to be a standard then please call it a draft standard, as that is what it is. This document is too important and significant to be at the leading edge of a new BSI marketing approach. If the standard is being developed using a new, more responsive and flexible approach, then please say that, not come up with a confusing name. There is too much at stake.</p> <p>What is proposed here needs to be a full British Standard – people understand what they are – there are 110 years of history behind the term “British Standard”. Why would we not use that?</p>	If this is to be a standard when published with the two letters “BS” in front of 8670, then refer to it as a draft BS or as this draft of BS 8670.		
5	CIBSE	Foreword	Page v para 4		<p>“It has been assumed in the preparation of this BSI Flex that the execution of its provisions will be entrusted to appropriately qualified and experienced people, for whose use it has been produced.” This is a slightly circular argument for a competence framework – we are assuming that the people applying the framework to others are competent? And are we sure that the Building Safety Regulator (BSR) will want to make such an assumption anyway?</p>	Review this with the shadow BSR.		
6	CIBSE	Foreword	Last para (bold)		Not clear why a standard rubric about a PAS is here	Remove rubric and replace with text for a British Standard.		
7	CIBSE	0.1	Para 5 – 1 st bullet of 2 nd group		<p>“learn from other sector good practice...”. Does this mean “learn from good practice in other sectors”? Or “learn from other instances of good practice in this sector”. We suspect the first.</p> <p>Perhaps this is also the place to flag the creation of good practice reporting of near misses, as in the aviation sector.</p>	<p>Amend to “learn from good practice in other sectors”.</p> <p>Make an explicit reference to the creation of a scheme for identifying and learning from “near misses” – again this is one to engage with the BSR about.</p>		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
8	CIBSE	0.1	End para 7			Update to refer to “setting the bar”		
9	CIBSE	0.1	Descripti on of Clauses		There is no reference to the “Sections” here (although there is a reference to “Section 3” in the second bulleted list of 0.2 below, which is confusing. Surely the Sections should be explained here as well as the clauses?	Include reference to the Sections here – but please also see note on calling Section 1 “Preliminaries” below.		
10	CIBSE	0.1	Descripti on of Clause 6		Says “competences for building safety”. Is it just “building safety”? Is this not about safety of the occupants? And safety from longer term health issues depends on building performance, too.	Consider “Clause 6 sets core competencies expected of those individuals responsible for the safety and performance of higher risk buildings and those who live in them, and includes...”		
11	CIBSE	0.1	Note at end		<p>“While the primary objective of this framework is to ensure competence in the safety of building work and Buildings....”</p> <p>Use of the word “ensure” sets an exceedingly high level of responsibility. Ensure amounts in legal judgement to guarantee. That is completely unrealistic. The normal standard for professional services is reasonable skill and care.</p> <p>Whilst the word is used in the CDM Regulations in a number of instances, in a number of those is it qualified by the phrase “as far as is reasonably practicable”.</p>	<p>Review the use of the word “ensure” here, and probably the other 101 instances where it is used. (Some remarked on below).</p> <p>Consider caveating “as far as is reasonably practicable” where appropriate.</p> <p>Get a lawyer to review the use of the term, because if used in some instances it could have the unintended consequence of ensuring that compliance is so onerous that no organisation can commit to deliver a scheme that is compliant with this Framework.</p>		
12	CIBSE	0.2	Para 1		“complement”? This does not look complementary. It is at least a supplement, and as noted in the next para it is intended to be a set of requirements for existing frameworks. Suggest that the paragraph is amended to say that.	This standard is intended to set an overall framework for existing training, development and competence schemes in the built environment. It does not replace these existing schemes nor is it intended to contain all the competencies required for a particular role or discipline.”		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
13	CIBSE	0.2	3 rd bullet in second group		Section 3 – currently not clear to what this refers – see comment 8 above.	Clarify reference to Section 3.		
14	CIBSE	0.2	Page viii 1 st bullet		Instance of ensure	Delete “ensure” and insert “enable”, then delete “are” and insert “to be” on second line.		
15	CIBSE	0.2	Page viii 5 th bullet		Should there be explicit reference to the proposed Competence Committee in clause 10 of the Draft Building Safety Bill here?	Refer to the Competence Committee.		
16	CIBSE	0.2	Page viii 9 th bullet		Instance of ensure	“improve the competence of individuals in their understanding etc....”		
17	CIBSE	0.2	Page viii 10 th bullet		This is an important statement and should be retained	No change proposed or supported.		
18	CIBSE	0.3.1	Para 2		Acknowledging that this is an evolving situation, more explicit reference to the Draft Building Safety Bill would be helpful here. The CDM Regs do not explicitly refer to ensuring competence – it’s a little more nuanced than that, for example Reg 4 says that the client “must take reasonable steps to ensure that ... the principal designer complies with ...duties in regulations 11 and 12.	Include an appropriate reference to the Draft Bill to complement that to the CDM Regs. Emphasise that as part of the Draft Building Safety Bill there will be new requirements – suggest including “The Draft Bill creates powers to prescribe in building regulations competence requirements on the Principal Designer and Principal Contractor, and any prescribed person, and to impose duties on the persons appointing them thoroughly to assess whether they meet the competence requirements.” Modify the reference to what CDM requires to more accurately reflect the legal drafting.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
19	CIBSE	0.3.2	Para 2		There is one group of ‘professionals’ who have the potential to torpedo this whole endeavour fatally. This Framework will cost. That cost will feed through into tender prices for all aspects of the supply chain. Unless procurement practice and those who oversee it changes, then this Framework will be fatally undermined. Those people MUST be included here – and if not already embraced in the drafting process then it is essential that the CIPS and Treasury are engaged. If we do not move away from lowest cost at any price, these reforms will fail.	Include reference to “procurement professionals” in the paragraph and ensure (as in guarantee) that they are engaged in this work!		
20	CIBSE	0.3.2	Para 3		Acknowledging that this is an evolving situation, more explicit reference to the Draft Building Safety Bill would be helpful here.	Include an appropriate element of the Draft Bill to complement the extract from the CDM Regs.		
21	CIBSE	0.3.2	Para 3		Reference to “England” – this is a British Standard covering the United Kingdom of Great Britain and Northern Ireland, not an English Standard.	Some reference to the potential for the Devolved Administrations to adopt this would be appropriate. Also a note that those who are based outside England but wish to work on English projects will be covered? Its sensitive and it needs tactful wording. We would expect MHCLG to engage with the devolved administrations over this – and we have members in Wales, Scotland, and all of Ireland who will be affected by this.		
22	CIBSE	0.3.2	Figure 1, Note		An assessment does not ensure anything (see earlier discussion). Competent assessors can make mistakes – if we create a framework that is so rigorous that mistakes cannot happen it will be unattainable!	Amend to read “An assessment of competence typically assesses that an individual has the general competences relating to the role and tasks they undertake – it cannot ensure that every decision or action they take will be correct.”		
23	CIBSE	0.3.5.1	3 rd full para (after 1 st bullets)		Another erroneous instance of ensure	“Competence frameworks typically include the following elements to deliver appropriate and consistent outcomes and provide a reasonable and suitable framework for assessment.”		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
24	CIBSE	0.3.6			Revalidation needs to be proportionate, reasonable, effective and robust. There is no connection between this clause and the normative requirements in clause 4.	Add sentence to the clause saying "The process for professional revalidation needs to be proportionate, reasonable, effective and robust". Consider moving the text and editing for inclusion in the normative part of the standard.		
25	CIBSE	0.3.7	Para 2		<p>"Amongst professional organizations maintaining competence is commonly referred to as Continuing Professional Development (CPD) and includes informal and formal activities." True, but does not fully convey the nature of CPD.</p> <p>There is no connection between this clause and the normative requirements in clause 4.</p> <p>The comment about the employers framework is there to remind employers that they have responsibilities in this respect – even if this is a framework for competence of individuals, employers have to play their part!</p> <p>After all, without competent individuals they will get no work on HRRBs!</p>	<p>Add a second sentence as follows: CPD should be undertaken as part of a planned programme of activity or Personal Development Plan, relevant to the individual's responsibility and career path and should be recorded. Employers should adopt a framework for assessing the effectiveness of CPD undertaken by their employees and contracted individuals.</p> <p>The glossary in Annex E needs to be amended to reflect the planned, relevant, recorded aspects of CPD.</p>		
26	CIBSE	0.3.7	a)		No mention of assessing needs for CPD	Add to first para "and identifying specific requirements for continuing professional development."		
27	CIBSE	0.3.8	1 st bullet		<p>Instance of ensure that exemplifies the problem of using the word or term</p> <p>How on earth can a competence framework ensure that someone "is aware of the limits of their competence" to the legal standard of ensure???</p> <p>Does this mean that when an individual takes on a task exceeding their ability the framework has failed? According to this bullet, it has, because it was expected to ensure otherwise.</p>	"Making participants in the scheme fully aware of the limits of their competence – etc."		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
28	CIBSE	0.3.8	3 rd bullet		Another instance of ensure. This is a framework for individual competence – it is not clear what this bullet actually requires of the framework, what it expects of the individual and what might be an organisational responsibility. As drafted it suggests that the individual may be responsible for providing additional training – that looks like an organisational responsibility.	Revised the bullet, determine the real intent and express that in a revised bullet.		
29	CIBSE	0.3.8	4 th bullet		So if the competent person fails to ensure that those for whom they are responsible are suitably competent to assess the competence of others, the framework has failed and the individual is liable? Has a lawyer looked at this? It has all the hallmarks of a wholly uninsurable risk and a degree of personal responsibility that no sane individual would accept.	This bullet needs rewording to indicate reasonable endeavours are expected, not a guarantee. Eg. “Making participants in the scheme fully aware of their responsibility to assess the capability and competence of those who appoint, procure or contract others to assess whether those individuals have suitable competence and appropriate tools and resources to undertake the relevant duties or tasks.		
30	CIBSE	0.3.8			Sentence not grammatically accurate	A positive culture of both disclosure and trust is required...		
31	CIBSE	0.4.1			“to ensure safe outcomes”. This is too ambitious. We can all do everything we can, as far as reasonably possible, to prevent another Grenfell. We cannot ensure that there is not another Grenfell (or Oxfords – it is not just about fire). Is it appropriate to bracket the changes to deliver safe outcomes with improving productivity? Is that not the old culture poking through – we’ll do a bit more safety if productivity improves to cover the cost! The requirement for a change of culture is a standalone, not to be “value engineered” and “set off” against some productivity improvements!	Delete “to ensure” and insert “to take all reasonable measures to deliver”.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
32	CIBSE	0.4.1	Note after para 2		It is understood that this draft standard is about individual competence. But that limitation, described in the Note, is not included in the Scope. A note in a foreword is informative and not normative and does not override the normative text of the Scope.	Add a limitation to the Scope that reflects this note (See separate proposal below). It would be useful to indicate where organisations might turn for a corresponding framework? Organisational competence is also going to be required, particularly for higher risk buildings.		
33	CIBSE	0.4.1	From immediately after the note		It is not clear why the remainder of 0.4 is included. It is background reading, and a reasonable amount relates to organisations, which are not in scope. If the assumption about those applying this draft standard at the beginning (see comment 4) is correct, then other than the first two paragraphs section 0.4.1 is largely superfluous.	Remove, or possibly transfer to an Annex, because whilst nobody reads the preamble, at least an Annex may be read – especially if referenced in the normative text of the standard.		
34	CIBSE	0.4.2	First line		The actions of organizations and individuals involved in ensuring safe outcomes – see comments on ensuring above.	The actions of organizations and individuals with responsibility for delivering safe outcomes		
35	CIBSE	0.4.2	Whole clause		Is this really material for a standard, or for “further reading”?	Consider removing, or placing in a further Informative Annex.		
36	CIBSE	0.4.3	Whole clause		Is this really material for a standard, or for “further reading”?	Consider removing, or placing in a further Informative Annex.		
37	CIBSE	0.4.4	Whole clause		Transfer the material to clause 5. This is too important to sit in a non-normative part of the standard buried two thirds of the way through 22 pages of introduction.	Transfer this to Clause 5.		
38	CIBSE	0.4.5	Whole Clause		Transfer to clause 5 – again, this is too important to be in an informative element of the standard. This is at the core of the change in culture that this framework is being created to drive.	Transfer and make normative – e.g. “sector specific frameworks shall address the following positive behaviours... [bulleted list]”		
39	CIBSE	0.5	0.5 – 0.8		The same remark applies here – surely this should be in the normative element – it provides the background to sections b) – e) of table 1. It is all too important to leave in the introduction in non-normative text.	Move these clauses into clause 5.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
40	CIBSE	0.9	Para 1		Is the opening statement based on an objective, published assessment of existing frameworks? If so, please insert the reference. If not, this should be amended to a factual statement.	"It is recognised that there are many existing competence frameworks which have been developed prior to this standard."		
41	CIBSE	0.9	Para 3		In this para and the subsequent lists there are more instances of "ensure" that should be rephrased.	In para 3, delete "ensure" – "help alignment" will do fine. In bullets b) – d) replace "to ensure that" with "to determine whether".		
42	CIBSE	0.12			It seems a bit incongruous to reference the CDM Regulations, but not the Draft Building Safety Bill. The first Note in the Scope effectively references the Bill without naming it – the Bill needs to be covered.	Consider inserting some commentary on the new legislation – recognising that it will be a work in progress when this draft BS is published.		
43	CIBSE	1	Section 1 heading and concept		Calling the Scope and Terms and Definitions "Preliminaries" and suggesting that they are not "Core" is not giving the right message. If the aim is to set out in clauses 4-6 the core characteristics of sector specific schemes that needs to be conveyed in a different way.	Remove the Section headings – all normative elements of a standard have equal weight and importance – under BS0. Follow BS protocol. If the aim is to set out in clauses 4-6 the core characteristics of sector specific schemes then perhaps introduce a very short clause 4 that says exactly that, and renumber 4-6.		
44	CIBSE	1	Scope para 3		The one liner conflates introducing the three separate bulleted lists with introducing the professional list. Suggest separating them as follows:	Separate out "This 'whatever' is of particular relevance to:" and then have three lists, the first introduced as "Professional groups such as"		
45	CIBSE	1	Scope – 1 st bulleted list		"engineers" is very broad and even vague, since it is not a protected term. We are not talking about those who repair domestic appliances, who are often erroneously referred to as "engineers" It is really important to pitch this at the correct audience.	Provide some examples, e.g. building services, civil, fire, façade, lift or structural, engineers.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
46	CIBSE	1	Scope – 1 st bulleted list		List should include facilities managers	Add bullet – “facilities managers”		
47	CIBSE	1	Scope		The Note in 0.4.1 says that this draft standard is not for organisations	Include this exclusion in the Scope explicitly.		
48	CIBSE	1	Scope		The list of regulated roles is a hostage to fortune. This draft standard will be published before the Bill receives Royal Assent. So the list of regulated roles could be altered.	Suggest amending the text to refer to the relevance of the Framework to regulated roles subject to statutory responsibilities, and the include the bulleted list as examples of such roles. This protects against changes in the Bill and also makes the Framework more applicable outside England (we believe that BSI is the NSB for Wales, Scotland and Northern Ireland as well?)		
49	CIBSE	1	Scope		Should the scope explicitly state that it includes provisions for CPD?	This draft standard includes requirements for continuing professional development of individuals who are part of any sector specific scheme.		
50	CIBSE	1	Scope		Should the scope explicitly state that it includes provisions for revalidation of individual competence?	This draft standard includes requirements for periodic revalidation of the competence of individuals who are part of any sector specific scheme.		
51	CIBSE	1	Scope		Insert the informative text from 0.10 para 3 as follows:	This standard is not intended to replace existing professional, technical or vocational training or competence frameworks. However, where individuals are being assessed for competence to work on higher-risk buildings it is expected that the sector-specific frameworks against which they are assessed will comply with the competences set out in this standard.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
52	CIBSE	3	Terms and Definitions		BSI employs a renowned specialist in built environment terminology. If he has not already been asked to review the terms and definitions then he should be. Clause 3 needs to be reviewed alongside Annex E.	Refer to BSI terminology expert for a full review.		
53	CIBSE	3.3	Competence maintenance		Instance of ensure	Activities undertaken to enable the skills, knowledge and behaviours of an individual to remain at a level that exceeds that required to be competent.		
54	CIBSE	3.6	CPD		The definition of CPD is inadequate	Amend definition to read "Planned, relevant and recorded activities undertaken as part of an individual personal development plan to maintain competence, including formal and informal learning.		
55	CIBSE	3.10	Revalidation		Align with 3.12, validation	"formal process of re-evaluating an individual's competence on a periodic basis against a sector specific competence framework to assess whether competence has been maintained"		
56	CIBSE	3.12	Validation		Insert "formal" at start	"formal process..."		
57	CIBSE	4.9	b) Note		Why is the EQF selected as the example here? Is an example needed – it implies some sort of BSI approval	Delete the text from "For example".		
58	CIBSE	5			See comment on 0.4.4 and 0.4.5 above.	Insert all of 0.4.4 and adjust as appropriate for inclusion in the normative clause.		
59	CIBSE	5			Improved linkage to Annex A is needed here to help users connect the two sections	Add cross references.		
60	CIBSE	6	Commentary		Why is this "commentary"? It is essential to understanding the normative requirements – it should be normative text.	Remove "Commentary" and treat as normative text.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
61	CIBSE	6		Commentary	The concept of life safety is introduced here (and is not defined in clause 3). It can be inferred from an analysis of table 2 that it is a broad definition – encompassing public health as well as fire and structural safety. This is really important and needs to be made much clearer. Ideally this would be in a definition of life safety			
62	CIBSE	6		Commentary	There is a question over the informative status of Annexes B-D. If they become the measure against which sector specific frameworks are to be assessed by the HSE or the Competence Committee proposed under the Draft Bill, then they are not going to be normative.	BSI, MHCLG and HSE/Building Safety Regulator need to make a policy decision about the status of these Annexes. If they are effectively going to have to be followed, then say so – let's not repeat the model of the Building Regulations and Approved Documents where requirements get slipped into the ADs masquerading as a bit of advice. (See Expert Group report , last sentence on page 8 for example.)		
63	CIBSE	6.1	a)		This sets a normative requirement to use Annex A. How can Annex A therefore be “informative”?	Make Annex A normative		
64	CIBSE	6.1	c)		Another unattainable instance of ensure	“require all individuals working on higher risk buildings to have, as a minimum, etc”		
65	CIBSE	6.1	d)		Another unattainable instance of ensure	“identify and assess where individuals working on higher-risk buildings require higher levels of competence.”		
66	CIBSE	6.2		Initial Note	If it is accepted that the Annexes contain things that shall be done to comply, then they are normative and the note is incorrect. Notes are not normative, so should not be used to refer the users of the standard to normative annexes.	Revise in line with BSI requirements for drafting.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
67	CIBSE	6.2	Table 2 b)		This sub-competence needs to very clearly include the need for all those working on higher risk buildings to be absolutely clear about the difference between regulations and advisory documents. The Expert Group which looked at this in 2018 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/877525/Final_report_of_the_Expert_Group_on_Structure_of_Guiance_to_the_Building_Regulations.pdf) undertook detailed research which revealed widespread ignorance and misunderstanding of the status of current statutory advice.	Insert into this part of the Table: “Demonstrate clear understanding of the difference between statutory requirements of building and other regulations and advice approved by government on how those requirements may be met.”		
68	CIBSE	6.2	Table 2 e)		For higher rise buildings this should include lifts – they are important life safety elements.	Add reference to lifts		
69	CIBSE	6.2	Table 2 e)		First note grammar	Includes but is not....		
70	CIBSE	6.3	Table 3 c)		Nobody can ensure safety is not compromised	“Awareness of actions necessary to minimise the risk that safety is compromised....”		
71	CIBSE	6.3	Table 3 c)		The term “commissioning” is used. There are two meanings of the term that are relevant to this standard – commissioning of a building or construction project in the sense of giving a commission or instruction to undertake work on that project, which is the more general use, and “commissioning” in relation to a building technical system or sub-system, which is the technical process of moving a system from completed installation to effective operation. In the building services sector this is the more common usage. As used in d) it is potentially unclear which use is intended. Not clear what “ensuring competence of others is doing here”.	Amend text of d), for example to read as “d) contribute to activities relating to the commissioning and procurement of a building or construction project, including pricing, purchasing and other commercial activities so as to minimise the risk that building safety outcomes and performance are compromised by decisions about cost and safety.		
72	CIBSE	6.3	Table 3 e)		It is not obvious how items a) and b) relate to this competence. Is there some text missing?			

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
73	CIBSE	6.4	Table 4		The font in the draft is erratic in this table	Correct font size		
74	CIBSE	6.4	Table 4 a)		Use of ensuring that might ensure that nobody can insure themselves to work on any HRRB.	Contribute to the commissioning, development, use, management, distribution, maintenance and presentation of the safety case and golden thread of information about the design, construction, operation, maintenance and refurbishment throughout the building life cycle, including: Obtaining, recording, updating sharing, safeguarding and keeping secure information about the building.		
75	CIBSE	6.4	Table 4 a) 2)		Add specification of the information and a reference to security	Specify, capture, issue, keep secure and maintain and update life safety information...		
76	CIBSE	6.4	Table 4 a) 3)		Include security minded information management	Add bullet – security minded management of information		
77	CIBSE	6.4	Table 4 a) 3)		Not clear about the opening phrase, “Awareness and take appropriate actions	“Be aware of and know how to implement and use:”		
78	CIBSE	6.4	Table 4 b) 2)		What is the difference between “verbal” and “written”? Verbal is to do with words – written or spoken. Since “written” is also listed, it suggests that “verbal” should be “oral” – verbal covers both, oral and written is more specific. It covers most communication other than pictures and morse code.	Delete verbal and insert oral.		
79	CIBSE	6.4	Table 4 b) 4)		The wording is not the easiest to follow	Communicate and explain in an audience appropriate manner where risks to life safety have been identified, the potential consequences and recommendations for potential mitigating measures.		
80	CIBSE	6.5	Heading and Table 5		Building – singular, or plural?	Plural preferred.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
81	CIBSE	6.5	Table 5 a)		Ensuring safety? Nobody can do that.	"...to minimise the risk to building safety."		
82	CIBSE	6.5	Table 5 a) 1)		Grammar awry	"Be aware of the building as a system and recognise how the component parts etc...."		
83	CIBSE	6.5	Table 5 b)		Another ensure	"...to minimise the risk to building safety."		
84	CIBSE	End of normative elements			The transition between the main sections is not clear when reading through the document. Suggest including a more obvious break before the Annexes.			
85	CIBSE	End of normative elements			There is currently no Bibliography – this would help to make a clearer distinction before the Annexes. Table B1 may form a part of that.			
86	CIBSE	Annex D, 3.5.1	page 41.		Extend the scope of the comment on legionella risk management	including risk of bacteriological infections such as those caused by Legionella or other water borne pathogens		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
87	CIBSE	D 3.5.3			This is not quite reflective of the current requirements, alternative wording offered	<p>D.3.5.3 Water systems are understood to pose a number of risks to health and safety including:</p> <ul style="list-style-type: none"> a) hot water cylinders should be maintained to be safe, particularly where they are pressurised cylinders; b) systems and distribution pipework should be able to withstand both the operating pressure and the temperature of hot water they carry to avoid deformation, leakage or failure; d) other systems including cisterns and tanks within dwellings should be designed and installed to resist likely temperatures and pressures and should be adequately supported; and d) hot water outlets (taps) in some locations should ensure temperature at delivery does not exceed 48 degree centigrade <p>All of these factors need to be understood and managed at design, construction and occupation stages.</p> <p>Water systems must be designed and maintained in accordance with The Water Supply (Water Fittings) Regulations 1999. To control the risk of legionella bacteria multiplying in water reference must be made to HSE document L8; Legionnaires' disease - The control of legionella bacteria in water systems – further information available at https://www.hse.gov.uk/pubns/indg458.pdf;</p>		
88	CIBSE	Annex D, 3.6			If the guidance in 3.6.4 and around flues in section 3.6 generally is appropriate, then should there be a reference to not installing combustible flues in residential buildings over 18m in height?	Consider inserting a sub clause addressing this.		

For public circulation	Name of SG review draft:	Draft BSI Flex 8670: v1.0 2020-09	Deadline for comments:	20 OCT 2020
-------------------------------	--------------------------	--	------------------------	--------------------

No	Comment submitted by	Clause./ Subclause/ Annex	Para/Fig/ Table/Note	Type of comment	Comment (justification for change)	Proposed change	Response to comment	Summary of outcome
89	CIBSE	Annex D, 3.6.4			This caution is quite detailed – is it appropriate for this document? It is important that it is seen as guidance and not in some way misinterpreted as BSI giving a view on such installations	Review wording to avoid deprecating such installations where they are fully compliant.		
90	CIBSE	Annex E	Overall		See comment on terminology for clause 3 and undertake a full review. Are all these terms really needed?	Include sources for the definitions in the glossary where these are taken from existing sources, which it is to be hoped many are.		
91	CIBSE	Annex E	Page 49		BRAC. Since this is the only instance of this term and the committee is due to be abolished, is it really needed in this Annex?	Delete		
92	CIBSE	Annex E	Page 50		Built Environment (sector) The draft bill describes the “built environment industry” as follows: “the built environment industry” means— (a) persons carrying on, for business purposes, activities connected with the design, construction, management or maintenance of buildings, and (b) employees of such persons; and references to a person “in” the industry are to any such person or employee; This is not aligned with the definition in Annex E, which may not be helpful	Consider aligning the two definitions and the standard following the draft Bill.		

To insert more rows, place cursor at end of row and press Return.