CIBSE response to Single Construction Regulator (SCR) Prospectus – March 2026

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About CIBSE

CIBSE (The Chartered Institution of Building Services Engineers) is the leading global body for building services professionals, championing sustainability, innovation and building performance across the built environment. We empower and equip professionals with the expertise, guidance and standards needed to deliver safe, efficient and future-ready buildings. Through our leadership in decarbonisation, building performance and continuous professional development, we support a community dedicated to creating better places for people and the planet.

In responding to this consultation, CIBSE has undertaken a range of engagement activity and sought feedback across our 24,000 global membership. Our response has been shaped by our dedicated Building Safety Working Group, member webinars, workshops and discussions with our Council, Board and Executive Team.

CIBSE summary statement

CIBSE welcomes the Government's ambition to strengthen regulatory oversight across the built environment through the proposed Single Construction Regulator.

The outcomes-based framework outlined in the consultation represents a positive step towards an even more coherent and effective regulatory system focused on building performance, professional oversight and accountability, and occupant safety and wellbeing.

Building services engineering plays a critical role in delivering safe, healthy and high-performing buildings in practice. Mechanical, electrical and public health engineering systems underpin many aspects of building performance, including fire safety systems, ventilation, energy infrastructure and indoor environmental quality.

CIBSE particularly supports the development of a regulatory framework that:

- Strengthens professional competence and registration
- Clarifies accountability and responsibility
- Prioritises safe and high-performing buildings throughout the lifecycle
- Provides consistent and comparable regulatory expectations

As a professional engineering institution with 24,000 global members, CIBSE is committed to supporting the Government, regulators and industry in delivering the objectives and outcomes proposed in this Prospectus through its work on professional registration, certification, technical guidance, training and knowledge generation.

Chapter 1: Vision for a future regulatory system

Q1. Where do each of the proposed outcomes for the system sit on a scale from very useful to not useful at all?

CIBSE considers the proposed outcomes to be very useful in establishing a clear articulation of what a new regulatory system should deliver for occupants (residents) and wider society.

The outcomes provide an important shift towards performance-focused regulation, which better reflects the realities of the built environment. Buildings must ultimately be judged by how they perform in use, including safety, health, comfort, energy performance and resilience. The proposed outcomes (in particular the first outcome) align with the long-standing objective of CIBSE to promote safe, healthy and high-performing buildings through professional engineering practice.

Greater emphasis should be placed on system integration, as safety outcomes are dependent on the interaction of multiple building systems and engineering services, rather than isolated components. Simultaneously, greater consideration should be given to building performance in occupation, as most risks to building users occur during the operational life of a building.

Buildings also operate within a wider built environment context, interacting with infrastructure systems such as energy, water and digital networks. These relationships should be considered within a broader regulatory approach.

Q2. What role would you and/or your organisation play in achieving these outcomes?

CIBSE plays a significant role in supporting the delivery of the proposed outcomes:

- **Professional competence and registration**: CIBSE licenses engineers through the UK professional registration system overseen by the Engineering Council, including Chartered Engineer (CEng), Incorporated Engineer (IEng), Engineering Technician (EngTech), and more recently through the register for engineers working on Higher-Risk Buildings (HRBs). This supports a robust competence framework across building services engineering.

- **Knowledge generation and technical guidance**: CIBSE produces widely used guidance, methodologies and standards, including industry-leading technical memoranda and design guides that support compliance with regulatory requirements and best practice engineering design.
- **Certification**: CIBSE also provides an independent service that independently verifies whether buildings, systems, and professionals meet recognised standards across building safety, energy efficiency and environmental performance.
- **Education, training and Continuing Professional Development (CPD)**: CIBSE provides structured CPD, training and professional development that support engineers and building professionals in maintaining competence throughout their careers. We also accredit higher education programmes and support apprenticeships, early-years STEM (science, technology, engineering and mathematics) learning and structured professional development pathways to ensure a sustainable pipeline of competent professionals.
- **Industry innovation and collaboration**: Through industry events, conferences, and special interest groups, CIBSE facilitates knowledge generation, information sharing and best practice across industry, academia and government stakeholders.

Collectively these activities support the regulator's objectives by raising professional competence standards, promoting best practice and enabling continuous improvement in building performance.

Q3. What will be the most important factors to achieving the proposed outcomes?

At CIBSE, we see several factors as crucial to the success of the proposed outcomes:

- **Professional competency requirements and regular, independent assessment**: Core competency requirements for professionals working across the built environment should be mandated and subject to regular, independent assessment of CPD and professional registration requirements. We have seen with the recent introduction of the HRB register that a voluntary regime can be limited in its impact and coverage. In addition, mandating requirements will ensure that those undertaking assessments (such as professional institutions like CIBSE) are doing so against an agreed standard applied consistently across the sector and other institutions.
- **The role of Chartered status and ongoing validation of professional registration**: We would also support a stronger emphasis on Chartered status, professional registration or a licensing regime for some safety-critical roles, including a regular (e.g. every five years) requirement for re-validation of

professional registration that ensures competency continues to be met, rather than being a single point-in-time assessment.

- **Whole-sector approach**: Competency requirements must apply consistently across the whole built environment workforce, including those undertaking smaller-scale construction, installation, maintenance or remedial works, as poor-quality work at any stage of a building's lifecycle can introduce safety risks and damage public trust.
- **Building oversight across the lifecycle, not just design and construction**: Buildings must be considered as long-term assets, with oversight that extends beyond construction into operation, maintenance, refurbishment and ultimately demolition. Data to evaluate a building's performance (such as energy use, air quality, temperature, ventilation and overheating risk) can help to ensure design intent reflects real-world realities.
- **Workforce capacity and capability**: Delivering improved safety outcomes will require a strong pipeline of skilled professionals. Investment in education, training and CPD will therefore be essential.

Q4. What are the most important barriers that could prevent the proposed outcomes from being met?

- **Workforce competency:** While some professions operate within robust competence frameworks already, other roles across construction and building maintenance do not require formal credentials or independent assessment. This inconsistency can undermine trust in the system and introduce avoidable risks.
- **Skills and workforce capability**: Higher competence expectations may expose gaps in skills and capacity across parts of the industry, particularly where specialist engineering expertise is required. This includes the resourcing requirements and expertise needed for a new regulatory function.
- **Cost saving over long term performance outcomes:** Procurement models that prioritise lowest capital cost can create incentives that undermine safety, quality and long-term building performance.
- **Implementation and further fragmentation:** The industry has responded and adapted to a range of (necessary) changes since the Grenfell tragedy in 2017. A new regulatory approach will need to be co-designed with industry and implemented through a phased approach with regular engagement and clear guidance and support mechanisms in place.

Q5. What data would be needed to demonstrate whether the outcomes are being achieved?

Measuring the success of the proposed outcomes through effective use of data will be crucial. Criteria could include:

- Professional engineers' registration data, including CPD records and assessment (subject to data protection protocols)
- Compliance and enforcement activity
- Building safety incidents and near-miss reporting
- Operational performance data such as energy use and indoor environmental quality, as well as maintenance and refurbishment information
- Resident satisfaction and complaint data
- Post-occupancy evaluation results

Improved access to operational performance data would help address the well-recognised 'performance gap' between design intent and in-use building performance, while post-occupancy building performance data can provide valuable feedback to improve future design and regulation.

Chapter 2: Integrating the regulatory system

Q6. Have you experienced any challenges with providing information via Government digital services when complying with current regulatory requirements across products, professions and buildings?

CIBSE members have highlighted that some engineers and organisations have experienced challenges, including:

- Fragmented digital systems across regulatory bodies
- Inconsistent data formats and reporting requirements
- Lack of interoperability between platforms
- Repeated manual entry of information across multiple systems

The success of the Planning Portal gateway has demonstrated how a clear, standardised digital process can streamline applications and reduce administrative duplication. A similar plain-English submission process, where required information is clearly visible and validated before submission, would reduce errors, improve compliance and reduce administrative burden across regulatory submissions.

Q7. How should the new regulator promote consistent digital standards and interoperability across the lifecycle of a building (including products, professions and buildings)?

The regulator should promote digital interoperability through:

- Adoption of open data standards for building information, including explicit references to regulatory requirements or standards where necessary

- Alignment with established digital construction frameworks such as Building Information Modelling (BIM)
- Clear requirements for lifecycle information management
- Standardised digital products and system data formats
- Development of interoperable regulatory reporting systems

The regulator should also ensure alignment with existing digital information requirements established under the Building Safety Act, particularly those relating to the Golden Thread of building information.

Q8. What digital tools and platforms do you find most effective for ensuring you meet regulatory compliance and why?

Digital tools that integrate compliance within design and asset management workflows are most effective, including:

- BIM-enabled compliance tools
- Digital building logbooks or Golden Thread information systems
- Digital product databases and specification platforms
- Standard metering information
- Common digital asset management systems used by building operators

Q9. What are the opportunities and risks associated with automating regulatory compliance checking (e.g. AI-driven assessment), and how should oversight, accountability and human review be retained within automated systems?

Automation and digital tools may provide opportunities to improve efficiency in regulatory compliance processes, for example by supporting document review or identifying incomplete submissions.

However, automated systems are unlikely to fully capture complex engineering decisions or system interactions. They may also present transparency challenges.

Given the infancy of AI, data inputs and outputs must be clearly defined, transparent and rigorously validated. AI models should undergo strenuous testing prior to deployment, with certified designers and contractors reviewing the decision-making logic and outputs to ensure they align with regulatory intent and engineering best practice.

Automated systems should therefore be used to support human decision-making rather than replace it, with clear accountability, audit trails and professional oversight.

Q10. Should the regulator play a role in setting behavioural standards and providing foundations for enforcement? If so, how should it do this e.g. via powers or duties?

Yes, the regulator should play a role in supporting high professional and organisational standards across the sector – and in many cases we would support going further and mandating some standards. This may include:

- Clear standards and expectations for professional and ethical behaviour
- Competence requirements, particularly for safety-critical roles
- Risk based and transparent enforcement processes

Professional bodies such as CIBSE already maintain codes of professional conduct aligned with standards recognised by the Engineering Council. The regulatory framework should work with these existing systems to reinforce high standards of professionalism, ethics and accountability. This should be about raising the bar for best practice, rather than simply setting minimum standards.

Q11. How can the regulator protect residents, enabling them to effectively exercise their rights to seek redress to make their homes safe, without fear or confusion?

Residents should have clear and accessible routes to raise concerns, transparent and plain-English information about building safety and performance, and confidence that concerns will be investigated properly and independently.

Q12. How can the regulator monitor the impact the regulatory system has on the safety of residents?

The regulator should monitor safety through a combination of:

- Professional registration, competency and CPD requirements
- Safety incident reporting
- Compliance and enforcement activity
- Building performance monitoring and inspection outcomes
- Resident feedback mechanisms

A clear, transparent process and mechanism should also be established for the Principal Accountable Person (PAP) to follow when reporting, responding to safety concerns and evidencing compliance, including defined steps, documentation expectations, timelines and escalation routes.

Q13. What should the regulatory system do to better share information between regulatory bodies to inform and support the delivery of resident-based outcomes?

Improved coordination between regulators could significantly strengthen oversight of the built environment. This could be achieved through:

- Consistent regulatory data standards and formats
- Mechanisms for sharing compliance and enforcement information (e.g. shared digital platforms)
- Coordinated investigation where regulatory responsibilities overlap
- Regular engagement mechanisms with professional bodies, Government and regulators

Q14. How can the regulatory system better support and advise residents?

Residents must be able to raise concerns about building safety without fear or confusion. Residents should have access to:

- Clear guidance about their rights and responsibilities
- Accessible explanations of building safety information
- Independent mechanisms for reporting safety concerns
- Transparent investigation and resolution processes

Chapter 3: Roles and responsibilities in an integrated regulatory system

Q15. Do you agree with the principles set out in this chapter, and the proposed roles and responsibilities for Government, regulatory bodies and industry?

CIBSE broadly agrees with the proposed principles and roles set out in the prospectus.

However, responsibilities across government, regulators and industry will need to be clearly defined and consistently applied, with strong coordination between all parties.

Professional institutions such as CIBSE should also be recognised as key partners in supporting competence, professional standards and continuous improvement. At CIBSE, we have 24,000 professional global members and many of these undertake crucial volunteer roles that help us deliver expert training and CPD, write new industry guides and standards, as well as collaborate and share best practice across the industry for the benefit of the industry. This needs to be harnessed across the professional institutions.

Q16. What are your views on how the new regulator can work with industry to support culture change, towards a quality- and safety-led culture? What sort of incentives or sanctions do you feel would be effective in supporting this change?

Achieving a stronger safety culture will require coordinated action across Government, regulators and industry. Experience from the evolution of health and

safety regulation demonstrates that cultural change is most effective when strong expectations are combined with proportionate enforcement.

Regulators can support this by:

- Setting clear expectations for competence and accountability
- Ensuring consistent enforcement
- Recognition the role of sector-specific professional institutions and expertise
- Promoting transparency and learning from failures

Industry must also play a proactive role by prioritising safety and quality in organisational decision-making. Professional bodies such as CIBSE can contribute through competence development, ethical leadership and knowledge sharing across the sector.

Q17. What are your views on how industry can best drive the culture change and respond effectively to the changes proposed in this prospectus? In your view, how prepared are individuals and businesses for these changes? What would support industry to be more prepared?

Industry has an important role in driving culture change through investing in workforce competence, embedding quality and safety into organisational culture, and adopting best practice technical standards.

Professional institutions such as CIBSE can support this transition through training, professional registration, technical guidance and knowledge exchange. However, achieving sustainable culture change will also require collaboration beyond industry and regulators, including with trade associations, education providers and occupants.

Continued investment in research, development and knowledge sharing will also be important to support innovation and continuous improvement across the sector. Professional institutions such as CIBSE, industry organisations and Government can all play a role in ensuring that emerging knowledge, use of technology and best practice are disseminated effectively.

As we move towards a new single regulator, timely engagement with the industry as well as clear guidance and, where necessary, transitional arrangements, will be essential. This will ensure that a new regulatory regime is practical, effective and capable of delivering safer and better-performing buildings, as well as delivering the other proposed outcomes in this Prospectus.