

APM response to call for evidence: Strategy for the built environment professions, trades and occupations (MHCLG)

The Association for Project Management (APM) is the Chartered body for the project profession, with over 45,000 individual members and over 470 corporate partners. We aim for a world in which all projects succeed because, when they do, society benefits. This response was completed by the APM Policy and Public Affairs team, with advice and guidance from senior stakeholders including APM Corporate Partners, APM Fellows, Board and Committee members.

Executive summary

APM's response is based on the premise that safe, high-performing and sustainable buildings depend on how the whole delivery system is led, governed and integrated. Technical competence is essential, but it is not sufficient on its own. Buildings move through a long chain of decisions: from the earliest definition of need, through design, procurement and construction, into occupation, maintenance, retrofit and future adaptation. At each point, decisions about scope, value, risk, evidence, cost, time and accountability shape whether the intended outcome can be delivered safely and reliably. Project, programme and portfolio management provide the discipline that holds those decisions together.

The scale of the project profession means that this is a material issue for the UK economy and for public confidence in the built environment. APM/PwC's *The Golden Thread 2024* estimates that project management accounts for 2.32 million FTEs and £186.8bn of annual GVA across the UK. In construction alone, the contribution is estimated at £33.1bn of GVA and almost 300,000 project management FTEs. Strengthening project competence is therefore not a narrow professional interest; it is directly linked to whether the country can deliver housing, infrastructure, retrofit, health estates, decarbonisation and public value at the scale required.

APM recognises that there is already strong practice across the sector and that many project professionals deliver complex work safely and effectively. The concern is that the system does not yet make that level of competence consistently visible, required or rewarded. Grenfell exposed the consequences of weak competence, poor information, unclear responsibility, commercial pressure and lack of challenge across the delivery system, including failures of project management and coordination. Project management alone cannot answer those systemic failures, but competent project professionals can play an important role in helping to address this.

This sits alongside a wider capacity challenge. The demand for project capability is increasing while organisations report concern about the skills needed to deliver successfully. APM's recent skills and business confidence evidence points to pressures around strategic competences, resourcing, investment in development and the ability of organisations to keep pace with changing delivery demands.

A further theme running through our response is that project management in the built environment takes different forms. A client-side project professional protects the brief, outcomes and decision rights. A construction project professional turns those requirements into coordinated site delivery. Subcontractor project professionals manage package-level delivery and evidence. Programme directors, estates leads and retrofit coordinators may be responsible for change across occupied assets, public services, resident interfaces and whole-life performance. The necessity and interrelatedness of these roles need to be more widely understood and recognised and the impact this has on overall safe delivery.

Any future approach to regulatory change should be risk based and proportionate. Routine and repeatable tasks may be controlled effectively through clear procedures, supervision and technical standards. More complex work requires a different level of professional judgement, particularly where there are multiple interfaces, safety consequences, resident or user impacts, public funding, novel technology or difficult trade-offs. Clear and proportionate regulation can improve confidence, encourage investment in competence, support fair competition and help clients understand what good

looks like. It should help the market move towards safer, better evidenced and higher-value work, rather than simply adding cost or delay.

For that to happen, regulation must focus on outcomes as well as compliance activity. Processes, forms, gateways and assurance checks are important, but they are not a substitute for competent judgement. A system that measures only whether steps have been completed can miss whether the right questions have been asked, whether risks have been understood, and whether the project is genuinely ready to proceed. The aim should be a framework that sets clear minimum expectations while still enabling learning, challenge and adaptation.

Competence reform also needs to address the way the market behaves. If procurement rewards lowest price above quality, experience and professional accountability, the system will continue to create pressure for thin teams, immature decisions and poor evidence. Procurement decisions have a direct influence on delivery because they shape the behaviours and assumptions that carry through the life of a project. Bids are often assessed against cost and programme commitments that favour a “contract-winning” schedule rather than a realistic one. In practice, this can mean that tenders are built on the assumption that stage gates will be passed first time, that rework will be minimal, and that risk and uncertainty can be absorbed later, even though experience suggests otherwise. Once these assumptions are embedded in the contract, delivery teams are placed under pressure to protect time and cost, sometimes at the expense of quality, proper planning and effective handover between stages. A more mature procurement approach would therefore test the credibility of proposed schedules, require evidence of realistic planning and contingency, and challenge optimism bias at tender stage, rather than allowing unrealistic projects to become the baseline against which performance is later judged.

Those who invest in assessed competence, CPD, ethical practice and robust governance should not be commercially disadvantaged for doing so. Public policy and regulation should help make competent practice visible and commercially worthwhile.

One way to achieve this is for government to make better use of credible professional body infrastructure. Where professional bodies assess competence, require continuing development, uphold ethical standards and can take action where standards are not met, their routes should be recognised in procurement guidance, funding decisions, gateway expectations, registers, insurance conversations and public sector capability requirements. This would not remove the need to test competence against the specific project, role and risk context, but it would give clients a more reliable starting point than job titles or self-declared experience. Professional bodies also support competence beyond initial assessment, through communities of practice, research, CPD, mentoring, guidance and the wider development of professional identity and standards. This wider ecosystem should be recognised and built on. As set out in [*Delivering Competence and Culture Change across the Built Environment*¹](#), a proportionate and effective approach is not to create a wholly new regulatory infrastructure across all parts of industry, but to strengthen and align existing competence systems, including regulated and registered professions where the risk justifies it. Direct regulation may be appropriate for some defined safety-critical roles, but a blanket approach would risk duplication, delay and confusion. Reform should therefore build on credible professional body routes and existing competence frameworks, using regulation and procurement to make assessed competence, CPD and professional accountability visible and valued across the built environment.

Our response draws on other sectors because the same underlying issues appear wherever complex, safety-related work has to be delivered through multiple organisations. Rail, nuclear and aviation show the value of role-based competence, authorisation, reporting and learning cultures. Healthcare shows the strength of professional registration in clinical roles, while also demonstrating the risks when estates, transformation and change activity do not receive the same structured professional attention. Infrastructure, water, local government, hospitals and occupied-building work all reinforce the importance of capable clients, active governance and project leadership. Lessons have also been drawn from government major projects and mega projects.

The approach needed is system-wide rather than role-by-role. APM's response does not suggest that every profession, trade or occupation should be treated identically. Instead, competence expectations,

¹ Delivering Culture Change and a Competent Workforce across the Built Environment A Cross Government, Regulator and Industry approach, May 2025

regulatory levers, professional recognition, procurement, client duties, contractor assurance, retrofit requirements and enforcement need to work together. Reform will be most effective where government, regulators, professional bodies, industry groups, clients and employers act on a shared understanding of the problem and use existing infrastructure wherever it is already credible.

The answers that follow therefore focus on the points where change is most likely to improve outcomes: stronger client capability, clearer project and dutyholder accountability, competent project management across the lifecycle, proportionate governance, better procurement, visible professional recognition, reliable evidence and information management, and a regulatory environment that supports both safety and long-term value.

Pre-design questions

Skills, knowledge and experience

1. What types of skills, knowledge and experience are needed to carry out pre-design work?

Pre-design work is the point at which the project is set up to succeed or fail. On larger, more complex projects it requires an intelligent client function, supported where necessary by competent project professionals, that can turn an initial need into a clear, deliverable and evidence-based proposition. The central capability is not simply producing early documents but creating the conditions for sound decisions: understanding what the project is for, what outcomes it must achieve, who has authority to decide, and what level of competence and assurance the work will require. Too often project expertise is brought in after these foundations have already been set, which limits its ability to shape the brief, test assumptions and prevent avoidable risk being carried into later stages.

Effective pre-design should establish whether the project should proceed, and if so on what basis. It should test the client's objectives against the reality of the site, funding, statutory obligations, programme, risk appetite and intended benefits before design commitments are made. This stage should give the client and project team a shared understanding of the project's purpose, constraints, decision points and delivery conditions, so that subsequent design, procurement and construction activity is based on tested assumptions rather than optimism or broad aspiration.

The competence required at this stage is therefore broad and integrative. Technical and regulatory understanding must be combined with the ability to frame the problem, compare options, understand whole-life value, shape the delivery model, recognise uncertainty and bring the right expertise into the process at the right time. Project management competence is important because pre-design is where the relationship between need, value, risk, affordability, governance and future delivery is first made explicit.

Pre-design should also distinguish between different levels of complexity. Straightforward and repeatable work should not be overburdened, but complex, novel, safety-critical or high-public-interest projects need a stronger level of project leadership, assurance and challenge from the outset. This is particularly important as consequences of early decisions extend beyond construction into continuity of use, resident or user experience, future maintenance and long-term performance.

The behaviours established at pre-design are as important as the technical analysis. The client and project team need to create a culture in which uncertainty can be surfaced, assumptions can be challenged, and decisions are made transparently rather than being deferred or hidden in later documents. Good pre-design leadership creates early clarity and momentum, while also allowing enough challenge to avoid premature commitment.

Organisational capability is equally important. Suitable governance, resourcing, accountability, information management and assurance need to be active rather theoretical. The aim should be proportionate governance that gives the project enough structure to make decisions, responsibilities and evidence visible, without creating process for its own sake. This is especially important where

project delivery has to work alongside business-as-usual activity, because unclear governance can leave early assumptions, scope decisions and compliance responsibilities unresolved.

This links directly to the client duties in Part 2A of the Building Regulations. Clients must be able to make and maintain suitable arrangements for planning, managing and monitoring work, including allocating time and resources, enabling cooperation and providing relevant building information. Many clients will need professional project management support to do this well, but that support has most value when it is brought in early enough to shape the project rather than simply administer decisions already made.

Pre-design should also keep the long-term purpose of the building in view. The work should not be framed only around securing approval or moving to the next stage. It should consider who the project is intended to benefit, how value will be created and sustained, and how future users, maintainers, communities and owners will experience the asset over time. Project professionals have an important role in helping clients hold that wider purpose, so that benefits, whole-life value, future stewardship and operational outcomes influence decisions from the outset.

2. In your experience, where are the most material gaps in skills, knowledge and experience in the pre-design phase?

The most material gap is client-side capability, especially among occasional clients, smaller developers, local authority estates teams and public sector sponsors who may not commission complex building work regularly. Too often, clients assume they have transferred responsibility by appointing consultants, when in fact the client remains accountable for making suitable arrangements, appointing competent dutyholders and maintaining oversight. Not all clients realise they have the duties under legislation and whilst many appoint project professionals to assist, often these appointments are delayed and limit the ability of the project professional to set the project up for success.

APM's, *But what about the locals? Understanding Project Management in Local Government*, 2026 report highlights that project professionals in councils frequently see inconsistent application of basic project management approaches.² For built environment projects, this can directly affect whether pre-design work is viable, evidence-led and aligned to community outcomes before procurement, planning or construction commitments are made.

The NAO's New Hospital Programme report is a practical example of this risk at programme scale. The NAO reported that DHSC announced the programme and its 2030 commitment before resolving major decisions on funding, delivery approach and the standardised Hospital 2.0 model. It also found that delivery to date had been slower than expected both on individual schemes and on central programme activities, particularly the development of Hospital 2.0. The risks identified in the New Hospital Programme are not isolated to health infrastructure and can be seen across other projects. The NAO's Lessons Learned from Major Programmes report draws on major programmes across government, including transport, defence and energy, and identifies recurring problems rooted in scope, planning, managing interdependencies and oversight. It notes that government bodies often struggle from the start to maintain a clear focus on programme objectives and how scope aligns with them, particularly where programmes have multiple objectives, involve more than one department, or contain tensions that are not clearly prioritised. It also warns that early cost and schedule estimates are highly uncertain because they are based on high-level information, and that government has often used such estimates to set budgets and completion dates before the underlying risks and uncertainties are sufficiently understood. The lessons learnt from this report, whilst often on a different scale, resonate across the built environment and reinforces the case for stronger pre-design capability: before projects proceed, clients and sponsors need the competence and authority to test objectives, scope, assumptions, affordability, programme realism, risk and delivery confidence, rather than allowing immature commitments to become the baseline for later delivery.

² Source: APM, *But what about the locals? Understanding Project Management in Local Government*, 2026.

A further gap is weak project mobilisation. Where there is no clear starting point, people join late, or delays demotivate the team, the clarity around scope and deliverables can be lost. This can particularly be the case where individuals and organisations are unclear around legislation changes or areas of focus. In pre-design this translates into avoidable ambiguity about who is leading, what has been agreed, what assumptions are being made, where responsibility or accountability lies and what decisions are urgent. A formal but proportionate kick-off or reset workshop should therefore be treated as a core pre-design control, particularly where a project has already started informally or has inherited unresolved decisions.

Based on interviews with corporate partners and senior stakeholders, other material gaps identified include commercial and contract competence; design management and design maturity; realistic estimating and quantitative risk analysis; interface and systems integration; evidencing competence beyond paper credentials; and preserving design intent for later stages. Ensuring there is ongoing competence development throughout people's careers is also a must so that professionals maintain their competence and keep up to speed with new developments, including technology and AI.

These gaps are often visible in weak brief development, insufficient feasibility and site analysis, and unrealistic baseline creation. Projects may proceed with broad aspirations rather than an agreed brief, with incomplete understanding of site constraints, regulatory requirements or environmental limitations, and with early budgets, schedules and risk registers that are optimistic rather than evidence based. These gaps can be partly addressed by employing competent project professionals, however the market does not yet support consistent approaches to competence and there are too many people in the built environment who call themselves project managers who do not deliver professionally, competently or have been assessed to demonstrate that they can do so. Individuals or organisations can accept pre-design roles without the competence, experience, authority or specialist support needed to discharge them effectively. For project professionals, this could be addressed, for example, by mandating Chartered project professional status on projects that are complex or carry significant risk.

3. Overall, how consistently are the necessary skills, knowledge and experience demonstrated in practice? Fairly inconsistently.

Behaviour, conduct and culture

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

Behaviour and decision-making at pre-design are shaped by the conditions created before technical work begins. The commercial model, procurement route, fee structure and reporting environment signal what is genuinely valued. Where those conditions reward low cost, rapid progression or optimistic reporting, teams have less space to test assumptions, expose uncertainty and challenge whether the project is ready to proceed. The result is that risk is often carried forward rather than resolved at the point when it is easiest to address.

Procurement and commercial strategy should therefore be treated as active influences on behaviour. A process that fixes the specification too early, transfers risk to parties unable to control it, or selects primarily on price, will shape the advice people give and the concerns they are prepared to raise. By contrast, a model that values competence, whole-life outcomes, realistic resourcing and collaborative challenge gives professional judgement more room to operate.

The culture of the project is established at the same time. Pre-design teams need to know whether honesty and challenge are expected, or whether their role is to confirm a preferred narrative. Many later disputes and safety risks begin as early assumptions that were not tested openly, including assumptions about affordability, scope, programme, site constraints, stakeholder needs or regulatory expectations. Good leadership and project management create the conditions for difficult information to be raised, recorded and acted on before it becomes embedded.

Positive behaviour at this stage depends on treating scoping, feasibility and baseline creation as professional judgement activities, not document production. A mature team tests the brief, qualifies early estimates, records assumptions and resists false certainty. Without that discipline, early

optimism can become a commitment that later design, construction or occupation teams cannot safely or affordably deliver.

Evidence from APM corporate partners and senior stakeholders reinforces the importance of clear accountability, ethical leadership, properly administered contracts, realistic gateway discipline and psychological safety. Positive behaviours are more likely where concerns can be raised without penalty and where there are also consequences for failing to raise material issues. Negative behaviours are reinforced where unresolved problems are reported as “green”, written concerns are discouraged, liability anxiety suppresses discussion, or non-compliance becomes normalised because there are no visible consequences.

In a recent interview with APM regarding his book ‘The Delivery Gap - why do government projects fail’ Jonathan Simcock said “The ideal situation is where you feel psychologically safe to present your genuine professional opinion; but you should also feel psychologically at risk if you don’t. It’s carrot and stick”.³

A culture that mandates challenge and enables bad news to travel early is fundamental to safe and effective pre-design work, however that currently does not always exist.

But what about the locals? Understanding Project Management in Local Government, 2026 identifies a “risk is bad” culture in some councils, where the acknowledgement of risk can be treated as failure rather than as a basis for preparedness and mitigation. Project professionals reported that well-evidenced advice was sometimes challenged, ignored or altered to fit preferred narratives⁴. For built environment projects, this is directly relevant to safety, cost and trust: if risk cannot be reported transparently at pre-design, the project is more likely to carry unresolved assumptions into design, procurement and construction.

5. Overall, how consistently are positive behaviours and decision-making demonstrated in practice? Fairly inconsistently.

Accountability and responsibility

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

Clear roles and accountability improve project delivery, behaviour and trust. Decisions are made at the right level and in time; early warnings are raised because people know it is their responsibility to raise them; assurance becomes proportionate rather than duplicated; risk ownership is clearer; disputes reduce because decisions and assumptions are recorded contemporaneously; and trust improves because the team can see who is accountable for what.

At pre-design, clear accountability also makes brief development, feasibility testing and baseline creation more robust. It should be clear who owns the business justification, who is responsible for confirming site and regulatory constraints, who approves the preliminary budget and programme assumptions, who maintains the early risk register, and who has authority to accept, reject or escalate unresolved information. Without that clarity, early uncertainty can be hidden inside documents rather than actively managed.

‘On HS2 C23 I took over at a point of low client confidence and weak scope certainty. The intervention that turned it around was not technical - it was clarifying decision rights and escalation routes across the design joint venture, the main works contractor and HS2 Ltd, and establishing one version of the truth.’ (David Dickinson, project manager HS2 C23)

In any project, clarity in ownership is an essential way of operating however the consequences of not doing this on complex or high-risk projects are so much greater. On complex projects/programmes, ambiguity in a role quickly becomes a gap in the work. A named accountable person with authority to

³ Jonathan Simcock interview, Project magazine Autumn 2025

⁴ *But what about the locals? Understanding Project Management in Local Government, 2026.*

decide, escalate and stop work where necessary is therefore not a bureaucratic overhead; it is a core safety and delivery control. This is not only important at the overall project level, but feeding down through named work packages, risk ownership and change requirements, for example.

7. What challenges are there in defining, understanding or delivering these roles, responsibilities and accountability during pre-design?

The main challenge is that contractual roles, statutory roles and organisational authority often do not align. The client may be a committee rather than a person; the sponsor may change; the project manager, principal designer, dutyholder and organisational decision-maker may be different people; and joint ventures or multi-party delivery models can blur accountability - everyone is responsible, so nobody is, and KPIs are not always aligned. Titles are sometimes allocated without the authority, time or competence needed to discharge the role.

The tension between professional project advice and political or short-term organisational priorities is also an additional accountability risk in public sector built environment projects. Project professionals can experience setbacks where expert advice is overridden in favour of quick wins, political cycles or reputational concerns. For local housing, regeneration, schools, transport, retrofit and public estate schemes, this reinforces the need for clear decision rights, transparent advice, documented escalation and senior project competence in major decisions.⁵

The principal designer role is a particular concern where in practice, it can be placed with whoever will accept it rather than the organisation with real control over design. If a person or organisation does not control the design, it cannot effectively discharge the duty, regardless of the appointment wording. The consequences include safety risks, stalled decisions, late discovery of scope gaps, duplicated assurance, defensive behaviour and loss of public trust.

8. Overall, how consistently are roles, responsibilities and accountabilities clearly defined, understood and applied in the pre-design phase?

Fairly inconsistently.

9. How well do clients generally understand their responsibilities under Part 2A of the Building Regulations 2010?

Understanding is variable and aligns with client sophistication. Major clients with professional in-house project, legal and technical functions generally have a better understanding of the dutyholder regime. They have taken advice, named dutyholders and incorporated the regime into risk and governance processes. Occasional clients, smaller developers, public bodies without mature estates capability and domestic-type client organisations are less consistent. They may confuse Building Regulations dutyholder roles with CDM roles, assume responsibilities can be transferred by appointment, or underestimate the continuing client duty to make and maintain suitable arrangements.

10. How well do clients generally deliver their responsibilities under Part 2A of the Building Regulations 2010?

Delivery is generally weaker than understanding. Even where organisations can describe the regime, implementation may be procedural rather than substantive. Competence declarations can become paper exercises; duties may be delegated downwards to a "competent person" without senior leadership ownership; evidence may be assembled late; and clients may not challenge poor information, immature design or unrealistic delivery assumptions. This is especially acute where the client lacks in-house technical, commercial and project delivery capability.

Good delivery requires the client to actively plan, manage and monitor the project, allocate sufficient time and resources, provide building information, enable cooperation and maintain review throughout the project. Where those activities are treated as compliance paperwork rather than leadership responsibilities, the regime is unlikely to achieve its intended effect.

⁵ Source: APM, *But what about the locals? Understanding Project Management in Local Government*, 2026.

With local government and local authorities often acting as clients, sponsors, estate owners and delivery partners, it is telling that nearly a third of local authority project professionals said council staff did not understand what project management is, and that project expertise is often mistaken for administration⁶. At pre-design, this can weaken the client's ability to define the need, test feasibility, establish a realistic brief, assess risk, commission competent support and make informed early decisions before design, procurement or construction commitments are made.

However, even large public sector clients may have extensive estates, capital and service transformation responsibilities, but lack consistent client-side project management competence. In the New Hospital Programme, evidence from the NAO report suggests heavy reliance on consultants and contractors, with limited legacy capability being built in the client organisation. That creates risk where the client must understand and discharge statutory responsibilities but may not have the internal competence to do so confidently.⁷

Wider major project sponsorship practice reinforces the importance of active ownership, while also recognising an important difference in the built environment: people and organisations may become clients, owners or dutyholders by virtue of ownership, funding, occupation or statutory responsibility, rather than because they already hold project or technical competence. Competence therefore cannot be a precondition for ownership. However, the Major Projects Association's sponsorship model⁸ is still highly relevant because it describes sponsorship as the function that maintains line of sight between the project and the intended benefits, brokers the relationship between the client and delivery organisation, authorises major changes, and requires the authority, responsibility and skills to make difficult decisions. Applied to Part 2A, the implication is that clients should not be expected to hold all specialist expertise themselves, but they do need access to competent support and enough sponsor-side capability to exercise ownership responsibly. In practice, this means being able to define outcomes, appoint and listen to competent project professionals and dutyholders, understand the significance of advice received, test whether assumptions remain credible, and intervene where governance, evidence or delivery confidence is weak. This would help ensure that client responsibility is not reduced to appointment and documentation but is supported by the professional capability needed to turn ownership into active oversight.

11. Overall, how consistently do clients understand and deliver their responsibilities under Part 2A? Fairly inconsistently.

System infrastructure

12. Does the current system of education and training, competence standards and frameworks, and regulation and oversight effectively incentivise and enable appropriate skills, behaviours, accountability and quality at pre-design?

(a) Education and training.

There is already a strong education and training infrastructure for project delivery, spanning accredited degrees, apprenticeships, professional qualifications, competence frameworks, CPD and routes to independent professional recognition. In project management, qualifications such as the APM Project Fundamentals Qualification and APM Project Management Qualification provide structured pathways for developing project knowledge, while Chartered Project Professional status recognises competence and higher levels of professional judgement, experience and ethical practice. This infrastructure is also reflected in government's own approach to project delivery capability: APM supported the development of the Government Project Delivery Accreditation Framework, which provides an industry-aligned route for recognising project delivery professionals across government from foundation through to master practitioner level. By offering a portable badge of competence and a licence to practise aligned to external standards, the framework shows that structured development and assessed competence are already embedded in parts of public sector delivery. The built environment strategy should build on this direction of travel by encouraging more consistent

⁶ Source: APM, *But what about the locals? Understanding Project Management in Local Government*, 2026.

⁷ Source: National Audit Office, *Progress with the New Hospital Programme*, July 2023.

⁸ Major Projects Sponsorship Model: Prof. Carl Gavin Professor of Project Management, University of Liverpool Management School for the Major Projects Association, October 2025

recognition of established project delivery standards, qualifications, CPD and professional assessment across both public and private sector delivery.

However, this good practice is not yet universal across the built environment. Many people carrying out project management or project leadership roles do not hold professional project management qualifications or belong to a relevant professional body. CPD plays an important role in maintaining competence as practice, regulation and technology change; it is a requirement for Chartered Project Professionals and an obligation for APM members. However, because many built environment project managers and client-side leads sit outside this professional membership system, the current approach does not ensure consistent CPD or professional accountability across the whole market at the pre-design stage. Proportionate regulation, procurement expectations or funding requirements that recognise appropriate professional qualifications, assessed competence and ongoing CPD for defined project management roles would therefore build on existing good practice and help raise competence across the built environment.

The local authority briefing shows why training and professional recognition matters for public sector built environment clients. Only a quarter of project professionals in non-mayoral local authorities agreed they had adequate access to training opportunities, while nearly 60% disagreed. The briefing also notes limited recognition of Chartered Project Professional status and inconsistent routine project management training. This matters because councils are responsible for commissioning and overseeing safety-critical public estate, housing, regeneration, retrofit and infrastructure projects, yet may not have consistent access to the project capability development needed to act as intelligent clients⁹.

The APM Salary and Market Trends Survey 2025 reinforces the need for structured training and qualification routes. It found that the APM Project Fundamentals Qualification is now held by 26% of respondents, up from 21% in 2023, while the same percentage of respondents as in 2023 — 19% — reported holding no project management-related qualifications. This suggests that there remains a significant pool of practising or emerging project professionals who could benefit from structured development, even at a basic level, particularly where they are managing built environment work without formal project management training¹⁰.

The APM Project Management Skills Survey 2026 provides further helpful insight. It found that 59% of project professionals learned their day-to-day skills on the job, compared with 16% through an external qualification or certificate and 12% through an external training course. While experiential learning is valuable, the survey warns that on-the-job learning can be siloed and may lack the rigour of professional standards, particularly where projects are increasingly complex, strategic and outcomes-focused.¹¹

(b) Competence standards and frameworks.

The current system of competence standards provides important foundations. Strong frameworks already exist: the APM Competence Framework sets out the knowledge, skills, experience and behaviours expected of project professionals; professional bodies provide routes for assessed competence, membership, continuing professional development and chartership; and built environment-specific work, including the Industry Competence Steering Group frameworks aligned to BS 8670 Part 1, provides a common structure for sector competence. The challenge is therefore not the absence of standards, but their inconsistent application by clients, employers, procurement teams and regulators at the earliest stages of projects.

There is clear evidence that the professional body infrastructure can support effective competence development when it is used deliberately. APM corporate partner case studies show how organisations use APM qualifications, the APM Competence Framework, membership and routes to Chartered Project Professional to create structured career pathways, align roles to recognised standards, improve governance and strengthen delivery confidence. WSP, for example, describes

⁹ Source: APM, *But what about the locals? Understanding Project Management in Local Government*, 2026.

¹⁰ Source: APM, *Salary and Market Trends Survey 2025*.

¹¹ Source: APM Project Management Skills Survey 2026.

aligning project management competency development and career progression with APM qualifications, membership levels and the APM Competence Framework. National Highways has developed a “starter to charter” pathway linking career stages to professional qualifications, accreditation levels and chartership, while Mott MacDonald identifies APM as providing a recognised pathway that supports project, programme and portfolio management development from both technical and non-technical backgrounds¹².

The priority should be to build on, align and amplify existing frameworks rather than create another disconnected system. This includes making professional membership, CPD, competence frameworks, codes of professional conduct and Chartered Project Professional status more visible and valued in procurement and regulatory processes. It also means using the ICSG Sector Led Group 7 competence framework for project managers in the built environment as a practical bridge between generic project management competence and the specific demands of the built environment. Developed with APM, CIOB and RICS, and aligned with the APM Competence Framework and Chartered Project Professional standard, it provides a shared view of minimum competence for project managers in this context.

(c) Regulation and oversight. Regulation and oversight have improved, but they are not yet sufficiently predictable, proportionate or learning-oriented. The dutyholder regime creates important obligations, but implementation is still embedding. Gateway and regulatory processes need to be clear enough to support good planning while retaining sufficient rigour. The system also lacks a consistent non-punitive investigation and learning mechanism equivalent to models in rail or aviation, where published independent findings help the whole sector learn rather than allowing failures to disappear into confidential settlements. The development of mandatory occurrence reporting for HRBs and the voluntary services provided by CROSS are welcomed but could and should go further.

Regulation and assurance should also be designed to support learning and adaptation. Gateway processes are most valuable when they improve decision-making, clarify evidence requirements, enable early engagement and allow proportionate conditional progression where risks are understood and actively managed. They are least effective when they become binary pass-or-fail barriers, or when they create additional assurance layers that encourage defensive paperwork rather than better outcomes. Feedback loops from gateway decisions should be used to improve standards, guidance, training and project practice over time.

Regulation should not be assessed only through short-term compliance cost. Poorly designed or poorly enforced regulation can externalise costs into the wider system through defects, delay, unsafe buildings, poor health outcomes, weak environmental performance, reduced productivity and loss of public trust. Conversely, clear and stable regulation reduces transaction costs, gives clients and supply chains confidence, and supports investment in skills, competence and quality. Regulatory impact assessment should therefore consider whole-system benefits over short, medium and long-term horizons, consistent with HM Treasury Green Book principles.

A further benefit of regulation at pre-design is that it can make competence visible and commercially valuable. Public or regulator-recognised registers, structured CPD expectations, periodic revalidation and organisational capability standards would help clients distinguish between those who have demonstrated current competence and those relying on unverified claims. This would support demand for competent client-side and project management roles, while still allowing proportionate due diligence against the specific project context. The approach to regulated and registered professions, as set out in [Delivering Competence and Culture Change across the built environment](#)¹³ provides a framework for delivery.

For individuals who hold Chartered Project Professional or who are members of APM there is also the additional oversight of the code of conduct they have signed up to which is enforced where needed, including removing ChPP status and also removing membership, where actions warrant this

¹² APM Corporate case studies: <https://www.apm.org.uk/corporate-partnership-programme/case-studies/>

¹³ Delivering Competence and Culture Change across the built environment, May 2025

response. This oversight provides assurance and this would be strengthened if professional membership and ChPP were mandated.

13. Overall, how effective is the current system infrastructure? Neither effective nor ineffective.

Interdependencies and transition

14. Which actions, behaviours and decisions at pre-design most influence subsequent stages and transition into design?

The pre-design actions that most influence later stages are those that determine whether the project has a credible foundation before design begins. These include whether the client has defined and can hold the brief; whether project professionals, users and operators are involved early; whether outcomes, benefits and information requirements are clear; and whether the delivery model, contract and risk allocation support the right behaviours.

Effective transition into design depends on turning those decisions into a stable and tested baseline. The brief, feasibility evidence, stakeholder expectations, constraints, assumptions, risks, competence boundaries and decision rights should be clear enough for design to proceed with confidence. Where these are weak, uncertainty is simply transferred into design, where it becomes harder and more expensive to resolve.

Learning from comparable projects should also be built in from the outset. Speaking to people who have delivered similar work and using peer-assisted reviews or pre-mortems where appropriate, can help identify recurring risks before commitment, including design maturity, stakeholder constraints, regulatory evidence, procurement, operational continuity, cost optimism and capability gaps.

Transition is strengthened by early contractor involvement where appropriate, staged contracts, integrated controls, named accountable decision-makers, active design management and handover of the rationale behind commitments, not just documents. It is undermined by immature design, unstable briefs, fragmented responsibility, incomplete information and pressure to proceed before the project is ready.

The APPG for Project Delivery¹⁴ report reinforces this point, highlighting evidence that projects are often pushed forward before sufficient planning and scoping have taken place, including pressure to get “spades in the ground” before scope and concept are properly finalised. The lesson for the built environment is that early discipline should not be seen as delay. Taking time at pre-design to test the foundations of the project is a control that helps avoid rework, late change, cost growth and loss of confidence later in the lifecycle.

Summary

15. Thinking about government’s vision for a well-functioning system where buildings are safe, high-performing and sustainable; individuals and organisations are enabled to thrive; and the building system is trusted, how significant an impact do each of these factors currently have on delivering these outcomes at the pre-design stage?

(a) Skills, knowledge and experience [5-point scale]

- Significant positive impact
- Moderate positive impact
- Limited impact
- Moderate negative impact
- Significant negative impact

¹⁴ All-Party Parliamentary Group on Project Delivery (APPGPD), *Building a Better Future: Inquiry into improving the delivery of national infrastructure projects*, November 2025

Moderate negative impact, because strong practice exists but is not consistently available where it is most needed.

(b) Behaviour, conduct and culture [5-point scale]

- a. Significant positive impact
- b. Moderate positive impact
- c. Limited impact
- d. Moderate negative impact
- e. Significant negative impact

Moderate negative impact, because commercial and reporting pressures frequently override open challenge and evidence-based decision-making.

(c) Accountability and responsibility [5-point scale]

- a. Significant positive impact
- b. Moderate positive impact
- c. Limited impact
- d. Moderate negative impact
- e. Significant negative impact

Moderate negative impact, because responsibilities are too often distributed between different parties, misaligned or unsupported by authority.

(d) Education and training [5-point scale]

- a. Significant positive impact
- b. Moderate positive impact
- c. Limited impact
- d. Moderate negative impact
- e. Significant negative impact

Limited impact, because current provision is good within the project profession, but it is inconsistently asked for by clients.

(e) Competence standards and frameworks [5-point scale]

- a. Significant positive impact
- b. Moderate positive impact
- c. Limited impact
- d. Moderate negative impact
- e. Significant negative impact

(f) Regulation and oversight [5-point scale]

- a. Significant positive impact
- b. Moderate positive impact
- c. Limited impact
- d. Moderate negative impact
- e. Significant negative impact

16. What practical changes or actions would make the biggest difference to how pre-design work is carried out?

- **Every project should have a deliberate mobilisation** or reset point before major commitment. This should include a kick-off workshop to confirm the project purpose, scope, outcomes, roles, decision rights, assumptions, priority risks, governance rhythm, escalation routes, information requirements and expected team behaviours. Where work has already begun informally, the project manager should be empowered to draw a line in the sand and reset the project before ambiguity becomes embedded.
- **Make brief development, feasibility testing and baseline creation explicit pre-design controls.** Before design work begins, the client and project team should confirm a structured brief, site and regulatory constraints, stakeholder requirements, preliminary budget, realistic schedule, risk register, assumptions log and information gaps. These should be reviewed as professional judgement products, not treated as generic initiation documents. Whilst this happens more often on larger, more structured projects, this should still be applied proportionally to smaller projects and avoid the temptation to skip straight to design.
- **Require explicit recognition of competence limits at appointment.** Clients should ask project professionals and organisations to confirm the scope of their competence for the specific pre-design role, identify where specialist input is required, and decline or qualify appointments where the role exceeds their certified competence, experience, authority or organisational capability. Whilst this should happen as part of the client duties, it is in danger of becoming a 'tick box' exercise, covered by broad generic competence statements.
- **Make client-side capability a condition of public funding and major gateway approval.** Public sector clients should require an independent capability and readiness assessment before major funding or contract award. Where consultants are being used there should be a commitment to transfer knowledge, capability and competence to internal resources enabling continued client competence.
- **Require independent design maturity confirmation before major contract award.** Major works on all projects should not proceed into commitment where the brief, design maturity, risk allocation, information requirements and governance are not demonstrably ready.
- **Use procurement to create demand for competence.** Clients should specify named accountable individuals with appropriate assessed competence, sufficient time and real authority. Procurement should evaluate organisational capability and delivery model, not only price and generic CVs.
- **Upskill existing resource through professional project management routes.** There should be recognition that the competence level of project managers in the built environment is mixed, with some very competent professionals, holding ChPP delivering successful projects, however this is not the case across the board. Where people are operating as project managers they should have to demonstrate competence through recognised professional routes. The application of this should be proportionate to the size and complexity of the project.
- **Use statutory recognition, public registers and procurement incentives to strengthen demand for competent project professionals.** Government should consider guidance that gives preference to suitably experienced members of recognised professional bodies for defined project roles, supported by accessible registers, CPD expectations, revalidation

where proportionate, and insurance or funding incentives. This would help clients check competence and create a commercial advantage for assessed professionals and organisations.

17. Which one change should be prioritised?

The priority should be client-side capability, backed by a hard gate on design maturity before any contracts are awarded. This would have the greatest impact because almost every other factor in the pre-design stage is downstream of what the client asks for, pays for, accepts and enforces. A capable client creates the conditions in which competent professionals can do good work; an incapable client can make good practice almost impossible, even where individuals are skilled and well intentioned. Where clients do not have this capability, they should be required to appoint competent project management support. Guidance should give preference to suitably experienced members of recognised professional bodies for defined project roles. This should be supported by accessible registers, CPD expectations, proportionate revalidation, and insurance or funding incentives. This would help clients check competence. It would also create a commercial incentive for assessed professionals and organisations.

This priority is practical because it does not require a wholly new framework. The building blocks already exist in the dutyholder regime, public funding controls, gateway processes, professional competence frameworks and procurement levers. The key change is to make competence and readiness across all projects a condition of proceeding, rather than a lesson learned after failure.

The APM Business Leader Index Survey 2025/2026 shows that leaders are operating in a more volatile delivery environment, with the need to deliver more quickly and often with less resource. This strengthens the case for making client capability, design readiness and realistic resourcing explicit conditions of proceeding, because project confidence can fall rapidly when organisations do not have the internal capacity, skills or funding to deliver¹⁵.

This is also consistent with the Golden Thread 2024, which found that 51% of UK businesses expect project-based activity to increase over the next three years and 45% expect average project budgets to increase. If project activity and budgets are growing while project management skills are harder to secure, client-side capability and readiness become increasingly important controls before projects proceed¹⁶.

Design and specification questions

Skills, knowledge and experience

18. What types of skills, knowledge and experience are needed to carry out design and specification work?

Design and specification should be treated as a critical decision-making stage, not simply a technical production activity. It is where the client brief, statutory duties, safety requirements, sustainability ambitions, operational needs, cost, programme and whole-life value are translated into decisions that shape construction, occupation, maintenance and future adaptation.

The competence required therefore extends beyond individual designers to the collective capability to develop, test and evidence an integrated design that is compliant, buildable, maintainable and safe. This requires clear design leadership, early specialist input, visible ownership of decisions and a disciplined evidence trail as the design develops.

Project management accountability is central to this. Project professionals are responsible for ensuring that design decisions remain aligned with the brief, business case, statutory obligations, budget, programme, procurement strategy, risk appetite and intended benefits. They provide the governance discipline through which assumptions are challenged, interfaces managed, risks escalated, decisions recorded, change controlled and unresolved issues brought to the right decision-makers before the project moves to the next commitment point.

¹⁵ Source: APM Business Leader Index Survey 2025/2026.

¹⁶ Source: APM/PwC, The Golden Thread 2024.

This does not mean project professionals replace technical designers or make decisions outside their competence. Their accountability lies in creating the conditions for competent design: protecting the client brief, commissioning the right expertise, testing design maturity, securing sufficient evidence, enabling challenge and resisting decisions driven solely by short-term cost or programme pressure. Where project professionals act for the client or sponsor, this accountability is particularly important. They should ensure that operators, maintainers and end users are engaged early enough to influence design, and that procurement and contract models give designers and principal designers the time, authority, fee and assurance needed to discharge their responsibilities properly.

The BSA Principal Designer also depends on effective project governance, information flows, decision routes and client engagement. Without these, there is a risk that accountability appears to have been assigned but is not supported by the authority, evidence or resources needed to make it effective.

19. In your experience, where are the most material gaps in skills, knowledge, and experience in the design and specification phase?

The most material competence gaps in the design and specification phase relate to design management, design maturity, client-side challenge, regulatory interpretation, product and specification competence, interface management, and the ability to evidence compliance before commitments are made. These gaps are significant because design work is often distributed across disciplines, consultants, contractors, subcontractors, manufacturers and specialist suppliers without a sufficiently strong design authority or project management function to integrate the whole. As a result, assumptions may go untested, interfaces may be missed, product and performance evidence may remain incomplete, and accountability for demonstrating that the design will meet statutory, safety, operational and whole-life requirements can become unclear.

A central issue is the failure to test design maturity before procurement or construction decisions are locked in. Immature design at contract award is a common cause of downstream delivery, commercial and assurance problems; wider infrastructure examples, such as Old Oak Common Station within HS2 delivery, demonstrate the consequences of progressing before scope, interfaces and assumptions are sufficiently resolved. Project professionals therefore need the competence and authority to challenge whether the design is developed enough, whether the specification is buildable and maintainable, and whether the project is ready to move to the next commitment point. Without this capability, projects can proceed on the basis of optimism, incomplete evidence or over-specified solutions that become difficult and expensive to correct later.

This is reinforced by evidence from senior stakeholder interviews, which identify a recurring mismatch between “paper competence” and actual competence. This can arise where staff named at tender are substituted later, design is priced too thinly, or individuals are asked to lead work beyond their experience. There is also a shortage of people able to manage complex multi-party design interfaces and challenge technical decisions while understanding the associated commercial and programme implications.

Client-side capability is another critical gap. Design and specification require an intelligent client, or a client supported by a competent project professional, who can hold the brief, protect functional and user requirements, challenge design assumptions, understand the implications of value engineering, and involve operators, maintainers and end users early enough to shape the design. Where clients rely too heavily on contractors, decisions may be driven by what can be delivered or priced rather than by what will deliver safe, usable, maintainable and valuable outcomes in occupation. Delivery models and commercial pressures, including design and build arrangements, novation, lowest-price procurement and value engineering, can blur responsibility for protecting design intent and increase pressure to accept substitutions, reduce checking, progress immature design or defer compliance evidence. Effective client-side challenge is therefore essential.

Product and specification competence is also material. Poor understanding of product information, conformity marking, AVCP systems, demonstrated scopes of application, imported product evidence, product substitution and the limits of manufacturer information can embed unsafe or unsuitable decisions before construction begins. Project professionals do not need to be product specialists, but they do need enough competence to ensure that the right specialists are involved, product evidence

is checked, substitutions are controlled, and specification decisions remain aligned with design intent, statutory requirements and whole-life performance.

The introduction of gateway processes has further highlighted the importance of evidence planning and assurance. Design-stage competence should therefore include the ability to plan compliance evidence early, maintain live assumptions and decision records, manage configuration and change control, and test whether evidence is sufficient before submission. Without this, the process risks becoming late-stage document assembly rather than genuine design assurance. Although there are good examples of practice, application remains inconsistent.

Competence assessment must also be more context specific. Design and specification competence is too often assessed generically rather than against the particular role, building type, complexity, risk profile and delivery model. A person may be qualified or experienced in one context but not competent for another, particularly where the project involves a higher-risk building, a live operational environment, a listed or heritage asset, complex service transformation, major stakeholder implications, or unfamiliar regulatory and product requirements. Assessment should therefore consider both the baseline professional framework and the specific context in which decisions are being made.

There are strong examples of competent project management and of organisations that actively support the development of competent professionals, including case studies published by APM at <https://www.apm.org.uk/corporate-partnership-programme/case-studies/>. However, practice is not consistent across the built environment. There is a clear distinction between competent project professionals and individuals who use the title of project manager without the required competence. Addressing that gap is essential if design and specification decisions are to support safer, better assured and more effective project outcomes.

20. Overall, how consistently are the necessary skills, knowledge and experience demonstrated in practice? Fairly inconsistently.

Behaviour, conduct and culture

21. What most influences behaviour and decision-making when carrying out design and specification work?

The most significant influences are the quality of the brief, procurement route, fee structure, allocation of risk, programme pressure, regulatory clarity and the behaviour modelled by the client. A stable brief, adequate fee, clear decision rights, proportionate assurance and a culture that welcomes challenge support better design decisions. Conversely, lowest-price procurement, compressed programmes, poorly defined scope, unclear regulatory expectations, excessive value engineering and late changes undermine safety, quality and whole-life performance.

Design-stage decisions set the conditions for successful delivery in subsequent stages, as assumptions about scope, sequencing, risk and assurance often determine how effectively later stages can be managed. If design programmes are based on optimistic timelines, limited allowance for iteration, or the expectation that approvals will be achieved first time, pressure is transferred downstream and can lead to rushed decisions, avoidable rework and weakened coordination between disciplines. A more robust approach would test the realism of design schedules, build in time for review and challenge, and ensure that uncertainty is addressed before commitments are fixed, rather than allowing unrealistic assumptions to shape the delivery baseline.

Commercial incentives can be especially damaging in design and specification. If a design appointment is under-priced, organisations may use less experienced staff, reduce checking time, limit specialist input, or treat compliance evidence as a late-stage administrative exercise. If procurement rewards speed and lowest cost more than quality and competence, the behaviour of the market will reflect that. The Procurement Act 2023 offers an opportunity to use public procurement more effectively, but only if clients use it to evaluate competence, quality, lifecycle value and delivery model rather than simply reproducing lowest-cost behaviours.

Positive behaviours are most likely where professional identity, ethical obligations, psychological safety, clear accountability and visible consequences are present. Designers and principal designers

need to be able to say “no”, record concerns, request further evidence, and resist pressure to specify products or accept design assumptions that cannot be justified.

Design and specification decisions are also shaped by the quality of communication and stakeholder engagement. Project professionals need to be able to explain the story of the project: why it matters, what future state it is creating, what trade-offs are being made, and why particular decisions support safety, value and long-term outcomes. This is not a soft add-on. It is central to securing buy-in, managing change, resolving conflict, maintaining public trust and ensuring that design decisions remain connected to intended benefits.

The response to question 4 is also relevant to the design phase.

22. Overall, how consistently are positive behaviours and decision-making demonstrated in practice? Fairly inconsistently.

Accountability and responsibility

23. What benefits are there when individual and organisational roles, responsibilities and accountability are clearly defined, understood and applied during the design and specification stage?

At the design and specification stage, clear accountability helps develop technical inputs into an integrated, evidenced and deliverable proposal. This is where decisions on statutory compliance, safety, accessibility, operational need, product choice and whole-life performance are made for others to rely on later. When responsibilities are clear, the right people should have confidence in making the right decisions, assumptions are recorded, interfaces are controlled and unresolved risks are escalated while there is still time to act.

The practical benefits are stronger design coordination, clearer ownership of design risk, more effective checking, tighter change control, better Gateway evidence and fewer late redesigns. Clear accountability also supports better behaviour because people are more likely to record concerns, challenge assumptions and seek decisions when escalation routes and decision-makers are visible. Interview evidence from complex programmes such as HS2 C23, Old Oak Common, Sizewell C and Manchester Airport show the value of clear accountabilities, interface control and a single source of truth in building delivery confidence. Whilst these examples focus on wider infrastructure, the lessons can be applied to the wider built environment.

Project managers are central to making accountability work in practice. They connect the client, principal designer, design disciplines, specialist designers, contractors, regulators, users and operators, and translate legal, contractual and organisational responsibilities into proportionate project governance. That governance should make clear who owns each decision, who can approve change, who controls interfaces, who maintains the evidence trail, who escalates unresolved issues and who confirms that the design is mature enough for the next commitment point.

This does not transfer statutory duties to the project manager. It helps dutyholders discharge them by ensuring that responsibility matrices, assumptions logs, interface registers, decision logs, change controls and Gateway evidence plans are live controls rather than retrospective documents. It also helps the client understand which decisions cannot be delegated, supports the principal designer with the structure needed for coordination, and reduces the risk that accountability is weakened through novation, value engineering, late substitution or informal decisions outside the agreed route.

These benefits are most important where projects are complex, design is distributed across several organisations, or the client is not technically mature. A clear principal designer function, supported by competent project management, design management and client-side challenge, helps ensure that the design is integrated, evidenced and capable of being built, occupied, maintained and operated safely.

The importance of aligned accountability is reinforced by the NAO's Lessons learned: Governance and decision-making on mega-projects¹⁷, which emphasises that governance must be clear about who has authority and accountability, particularly where decisions and accountabilities stretch across a system or set of organisations. It also notes that clarity is needed not only for those formally charged with governance, but also for those in the wider decision-making landscape who may influence outcomes. Applied to design and specification, this supports the case that principal designer accountability needs to be reinforced by a wider project system in which client authority, design responsibility, decision rights, escalation routes, funding controls, technical assurance and change governance are aligned. Without that alignment, there is a risk that accountability is assigned in form, but not supported in practice by the authority, information or organisational conditions needed to influence the decisions that shape compliance and safety outcomes.

24. What challenges are there in defining, understanding or delivering these roles, responsibilities and accountability during the design and specification stage?

The principal challenge is that design responsibility is often fragmented across architects, engineers, specialist consultants, contractors, subcontractors, manufacturers and suppliers. Delivery models can blur the boundary between design coordination, technical design, temporary works, specialist design and product selection. In design and build arrangements, novation can also create uncertainty about who is protecting the original design intent and who is responsible for challenging later substitutions or value engineering proposals.

A further challenge is that contractual, statutory and organisational roles do not always align. The person appointed as principal designer may not have genuine control over the design, sufficient authority to obtain information from others, or enough time and fee to discharge the role effectively. In some cases, the role appears to sit with the party prepared to accept the appointment, rather than the organisation best placed to control and coordinate design decisions. Where this happens, the appointment can create the appearance of accountability without the practical authority needed to fulfil the duty.

Commercial pressure also undermines accountability. Lowest-price procurement, unrealistic programmes, reduced checking time, junior substitution and late value engineering all increase the risk that design assurance becomes superficial.

Whilst good project management can help address these issues, the system also needs to be prepared to accept the required governance, co-ordination and accountability that is needed.

25. Overall, how consistently do roles, responsibilities and accountabilities appear to be clearly defined, understood and applied in the design and specification phase? Fairly inconsistently.

Good practice is evident in mature client organisations, major programmes and sectors with stronger assurance cultures. However, consistency still depends too heavily on the client, procurement model, project complexity and the organisations involved. The system does not yet reliably ensure that design accountability is supported by the necessary competence, authority, resources and control.

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

Awareness and understanding are increasing, but it remains inconsistent across the sector. Larger design organisations, repeat clients and teams working on higher-risk buildings have generally invested in advice, training and role definition since the Building Safety Act and associated dutyholder regime came into force. They are more likely to understand that the principal designer must plan, manage and monitor design work, coordinate designers, take reasonable steps to ensure design work complies with Building Regulations, and cooperate with the client, principal contractor and other dutyholders.

¹⁷ Source: National Audit Office Lessons Learned: Governance and decision-making on mega-projects, March 2025

However, interviews with senior stakeholders suggests that understanding is still patchy. There is confusion between CDM principal designer duties and Building Regulations principal designer duties; uncertainty about the evidential expectations for Gateway applications; and inconsistency about how organisational competence should be demonstrated.

Understanding also varies by project type. On major infrastructure-adjacent projects, such as stations, terminals or mixed-use development, stronger systems of safety assurance may support better discipline. In smaller projects, alterations and occasional client environments, there is less awareness of the distinction between appointment, competence, control and accountability.

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

Delivery is less consistent than understanding. Some principal designers are using the role to strengthen design coordination, compliance evidence, information management and challenge, but in many cases, delivery remains procedural rather than substantive. Competence statements, design responsibility matrices and compliance trackers are useful only where they reflect real scrutiny, live coordination and the authority to stop or change design decisions where necessary.

Senior stakeholders identified recurring delivery weaknesses, including delayed Gateway submissions, uncertainty about evidence requirements, limited client challenge, paper competence not matching actual competence, and fragmented design roles. These risks are greatest where the principal designer lacks authority, adequate fee, time or access to competent specialist input, or where commercial pressure encourages design progression before compliance has been evidenced.

Effective delivery requires the principal designer role to be supported by the wider project system. The role needs early appointment, clear scope, sufficient time and resource, competent input, authority over design coordination, active client support, and a culture in which concerns can be raised and acted on. Without these conditions, the dutyholder regime risks being complied with in form rather than substance.

Effective project management can help create those conditions. A competent project manager can ensure that the principal designer is appointed early, properly resourced, connected to the right specialists, and given a clear route to the client for decisions and escalation. Project management also provides the governance discipline needed to keep responsibility matrices, compliance plans, information requirements, assumptions logs, interface registers, change controls and Gateway evidence live throughout design.

28. Overall, how consistently do principal designers understand and deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010? Fairly inconsistently.

29. Does the current system of education and training, competence standards and frameworks, and regulation and oversight effectively incentivise and enable appropriate skills, behaviours, accountability and quality of work at the design and specification stage?

(a) Education and training. The response to question 12 is equally applicable to design and specification as it is to pre-design.

(b) Competence standards and frameworks. The response to question 12 is equally applicable to design and specification as it is to pre-design.

(c) Regulation and oversight. The response to question 12 is equally applicable to design and specification as it is to pre-design.

30. Overall, how effective is the current system infrastructure for skills, competence and regulation and oversight at incentivising and enabling appropriate skills, behaviours, accountability and quality of work in the design and specification stage? Neither effective nor ineffective. The answer to question 13 is equally applicable to design and specification as it is to pre-design.

31. Which actions, behaviours and decisions at the design and specification stage most influence subsequent stages of the building lifecycle, and which support or undermine effective transition into the construction stage?

The design and specification stage has a significant influence on construction, occupation and maintenance because it determines what is to be built, how compliance will be evidenced, which products and systems will be used, and how risks and interfaces will be managed. Effective transition depends on confirming that the design is sufficiently mature before contract award, that the brief remains stable and testable, and that responsibility for design decisions, information requirements, product evidence, change control and Gateway evidence is clear.

Standardisation can support this, but only where it is mature and properly governed. The NAO's New Hospital Programme report¹⁸ illustrates both the opportunity and the risk: DHSC's plans to standardise hospital construction had the potential to improve efficiency and repeatability, but the central Hospital 2.0 model was still under development and had progressed more slowly than expected. The lesson for design and specification is that standardised designs can improve quality, productivity and consistency only where they are tested, operationally usable, supported by clear evidence, and capable of appropriate local adaptation.

A strong transition into construction is supported by early contractor involvement, staged contracts, independent design maturity assessment, robust change control, clear configuration management and a live evidence trail that explains why the design is compliant. It also requires the rationale behind decisions to be handed over, not just the documents. Lessons from projects such as Sizewell C and Manchester Airport show the value of maintaining continuity from consent, operational requirements and early commitments into delivery.

Transition is undermined where design is immature at contract award, design intent is weakened through novation or late value engineering, responsibilities are fragmented, product evidence is incomplete, Gateway expectations are unclear, or information is transferred as a document dump without explanation. In those circumstances, obligations can be lost or misinterpreted, creating construction-stage delay, disputes, redesign, cost growth and reduced confidence that the finished building will be safe, maintainable and capable of operating as intended.

Summary

32. Thinking about government's vision for a well-functioning system where buildings are safe, high-performing and sustainable; individuals and organisations are enabled to thrive; and the building system is trusted, how significant an impact do each of these factors currently have on delivering these outcomes at the design and specification stage?

The answers to question 15 are equally applicable here.

33. Thinking about the issues raised in your responses to questions 18-32, what practical changes or actions would make the biggest difference to how design and specification work is carried out?

The biggest difference would come from making competent design leadership, early compliance evidence and clear design accountability normal project requirements. This should be delivered through client leadership, competence-based procurement, stronger use of professional body assessment, clearer principal designer expectations and proportionate regulatory guidance. Whilst this happens on some projects, it is not consistently applied.

Clients should procure design and specification work on the basis of competence, quality, risk and whole-life value, not lowest initial fee. Public sector clients should lead by testing design maturity, named competent personnel, organisational capability, checking arrangements, information management and Gateway evidence plans before appointment. Practical support should include standard procurement questions, model evaluation criteria and appointment guidance for design and BSA principal designer roles.

The Building Regulations principal designer role should be strengthened in practice. Government, the Building Safety Regulator, professional bodies and industry groups should clarify the authority, resource, evidence, coordination and challenge expected for different project types. This should

¹⁸ Source: National Audit Office, Progress with the New Hospital Programme, July 2023

include clearer guidance on the relationship between CDM and Building Regulations principal designer duties, proportionate examples, and expectations for responsibility matrices, compliance plans and change control.

Professional competence frameworks should be easier to use in appointments. Greater use should be made of professionals assessed by relevant professional bodies, including Chartered Project Professionals where appropriate. This gives clients evidence that an individual has demonstrated competence against recognised standards, is subject to professional expectations, and is expected to maintain competence through CPD. It is not a substitute for checking competence against the specific project, role, risk and context, but it is a stronger first filter than relying on job titles, CVs, day rates or self-declared experience and provides professional accountability through codes of conduct and requirements and the supporting infrastructure to maintain competence.

Design assurance should start earlier and be maintained throughout design. Project teams should establish a compliance strategy, design responsibility matrix, product evidence plan, interface register, assumptions log and change control process at the outset. Clients and design organisations should invest in information management and configuration control. While leading organisations use these frameworks, many projects still struggle with fragmented early compliance and reactive change control.

Finally, regulation and market incentives should make assessed competence easier to verify and more commercially valuable. Public clients should recognise relevant professional standing, CPD, proportionate revalidation and organisational capability in procurement. Government and regulators should explore recognised registers or statutory guidance so clients can verify competence more easily, while insurers and funders should be encouraged to recognise lower-risk appointments where competence has been independently assessed.

34. Of the actions listed in your response to question 33, which one change or action would you prioritise to deliver the greatest impact?

The priority should be to make competent, properly resourced design leadership and early compliance evidence a mandatory expectation in procurement and appointment decisions, supported through good project infrastructure and governance. This would have the greatest impact because it addresses several root causes at once: inadequate client capability, lowest-cost design procurement, unclear accountability, weak design coordination, poor evidencing of compliance and late-stage discovery of safety or performance issues. This should be delivered in collaboration with the recommendations in question 17.

These actions should be prioritised because regulation, standards and training will have limited effect if the market continues to commission design work in ways that do not allow competent practice to be delivered. Better procurement and appointment decisions would create demand for real competence, support positive behaviours, give dutyholders the authority to act, and improve the quality of evidence available to regulators, contractors, building owners and users.

Construction response

Skills, knowledge and experience

35. What types of skills, knowledge and experience are needed to carry out construction work?

Construction work requires more than competent trades and technical expertise. Safe and effective delivery depends on the ability to integrate design intent, statutory duties, commercial realities, programme constraints and site conditions into a coherent delivery system. Project management is central to that integration. It provides the structure through which decisions are made, risks are surfaced, interfaces are managed, change is controlled and evidence is captured as the work progresses.

Without this project management capability, technically competent work can still fail because the wider delivery environment is poorly coordinated, under-evidenced or shaped by the wrong commercial and cultural pressures.

At organisational level, the required capability is the ability to create the conditions in which competent work can be delivered consistently. This includes clear leadership, adequate resourcing, effective supply chain control, disciplined quality assurance, reliable records and a culture in which people are expected and supported to raise concerns. Project management is the mechanism that connects these elements so that the approved design, procured products, installed work, inspection evidence and handover information remain aligned throughout construction.

The importance of project management increases with complexity. Higher-risk buildings, complex public buildings and live operational environments require stronger integration, clearer accountability and more disciplined control because decisions are interconnected and the consequences of failure are greater. In all contexts, the skills, knowledge and experience in construction is not simply the ability to build; it is the ability to coordinate people, information, risk, assurance and culture so that the building can be delivered, occupied and maintained safely.

Construction also requires different project management roles to work together as part of one delivery system. The client project manager should hold the client brief, funding conditions, gateway commitments, benefits, risk appetite and decision rights. The principal contractor should translate these requirements into a coordinated construction delivery plan, including site management, sequencing, logistics, subcontractor coordination, quality control, safety management and evidence capture. Subcontractor project managers then need to manage their own packages in line with the approved design, programme, quality requirements, product controls, inspection plans and change processes. The competence requirement is not that one project manager controls everything, but that these roles understand their interfaces, share reliable information, escalate issues promptly and maintain one coherent route from design intent to installed, inspected and handed-over work.

This collaboration depends on clear governance and disciplined project controls. Client project managers, principal contractors and subcontractor project managers need agreed routes for instructions, early warnings, requests for information, design clarifications, change approvals, product substitutions, quality inspections, non-conformance reporting and handover evidence. Where these routes are clear, subcontractor expertise can be brought into sequencing, buildability and risk management without diluting accountability. Where they are weak, issues can be passed between tiers of the supply chain, design intent can be lost, and pressure to maintain programme can override quality, safety or compliance evidence.

For smaller works and alterations, the same principles apply, but the competence challenge can be more acute because teams are smaller, roles are combined and independent assurance may be limited. Proportionate project management is still needed to confirm scope, appoint competent people, control product substitution, manage statutory duties, record decisions and preserve handover information. Proportionality should not become an excuse for informal practice where workmanship, compliance evidence and accountability are not properly controlled.

At a recent roundtable hosted by APM, regarding Principal Contractors, participants highlighted the need for construction competence to be assessed against the risk and context of the work, not merely against the size of the organisation. A one-person firm replacing a fire door, an M&E contractor breaching compartmentation, or a specialist contractor carrying out work in a higher-risk building may create significant safety consequences even where the work appears small. Competence therefore needs to include the ability to understand when apparently minor works affect fire safety, structure, compartmentation, services integration or the building safety case, and when additional specialist input, notification, inspection or evidence is required.

36. In your experience, where are the most material gaps in skills, knowledge, and experience in the construction phase?

The most material weaknesses are in supervision, quality management, commercial and contract competence, supply chain integration, evidencing compliance and client-side challenge. Many construction failures arise not because nobody knows how to build, but because the system around the work does not provide enough time, resource, scrutiny or authority for competent people to do the right thing. Thin site teams, aggressive programmes, lowest-price procurement, late design changes, fragmented subcontract packages and poorly controlled substitutions all create conditions in which defects, non-compliance and poor-quality records can occur. Good practice happens in isolation, but

the system that holds it together is fragmented and often supported by project managers who do not have the right competence to be in the role.

The Principal Contractor roundtable provided practical examples of these gaps. SME contractors described increased administrative burden since the Building Safety Act and warned that smaller firms may struggle to meet the same evidence expectations as major contractors without proportionate routes. Participants also noted that end-user clients often do not understand the construction supply chain or the point at which a contractor becomes the principal contractor. This creates risk where competent firms are willing to comply, but clients do not know what to ask for, do not recognise when competence evidence is required, or procure works in ways that make compliance difficult.

Quality assurance and inspection are particular areas of concern. Inspection regimes can become paperwork-led rather than evidence-led, and the people checking work may not have sufficient independence, time or competence to challenge what has been installed. This is critical for hidden works, fire stopping, façades, building services, structural connections and other elements where later inspection is difficult or impossible.

A further issue is the shortage of experienced mid-career capability. The experience of senior stakeholders interviewed is that, particularly in the construction phase, there are good graduates and good senior people, but too few practitioners in the middle who can run complex interfaces, lead multi-party site teams, understand commercial consequences and still hold the line on quality and safety. This is exacerbated by fee pressure and procurement models that encourage organisations to price work with less experienced people than the project actually needs. Whilst this is prevalent in the construction stage, it is also reflected across all delivery stages.

The APM Salary and Market Trends Survey 2025 also highlights why pay, recognition and retention are relevant to construction-stage capability. It reports an average salary of £52,500 for project professionals, with 47% earning above £50,000, and notes that better pay is the most common reason respondents who are likely to change jobs give for doing so. If built environment organisations do not recognise and reward project management competence, they risk losing experienced mid-career practitioners to other sectors that can offer clearer progression and better remuneration¹⁹.

CITB's Construction Workforce Outlook further supports this point by noting that the industry faces a circular challenge: construction needs a long-term view for skills investment, but many businesses, particularly small firms, make decisions based on short-term order books. Project managers, programme managers and client-side delivery professionals need stable pipelines, funded development routes and sustained employment pathways if they are to develop the judgement required for complex delivery²⁰.

The Golden Thread 2024 provides wider evidence for this workforce pressure. It found that the construction sector employed an estimated 299,798 project management FTEs in 2024, up from 258,888 in 2019, and generated £33.1bn in project management GVA. This growth reinforces the need to develop and retain competent mid-career project professionals who can lead complex interfaces, manage risk and support safe delivery²¹.

Competition for competent professionals is also heightened due to greater need for project professionals in engineering construction companies including engineering design, procurement, project management, construction, repair and maintenance, and decommissioning across sectors such as nuclear, oil and gas, power generation, renewables, chemicals, food and drink, pharmaceuticals and water treatment. These are not identical to the wider built environment, but they draw on overlapping occupations, project management, design, construction management, maintenance and safety-critical delivery capability²².

37. Overall, how consistently do you think the skills, knowledge and experience necessary in the construction phase are demonstrated in practice? Fairly inconsistently.

¹⁹ Source: APM, *Salary and Market Trends Survey 2025*.

²⁰ Source: CITB, *Construction Workforce Outlook: United Kingdom 2026–2030*.

²¹ Source: APM/PwC, *The Golden Thread 2024*.

²² Source: ECITB, *Workforce Census 2024 Sectoral Report*.

Behaviour, conduct and culture

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

The strongest influences on behaviour and decision-making during construction are the commercial model, programme pressure, the quality and maturity of design information, site leadership, inspection culture, supply chain fragmentation and the client's competence. People and organisations behave in the way the contract, fee, programme and reporting environment incentivise them to behave. If the job has been bought on lowest price, with risk pushed down the supply chain and insufficient allowance for supervision, checking and records, the construction phase will be under pressure from the outset. A specific problem is created by "contract-winning" schedules rather than realistic schedules. Bids are often built on the assumption that stage gates will be passed first time, that design issues will be resolved without material rework, and that any residual risk can be absorbed later. In reality, projects rarely proceed in this way: actions from design reviews and stage gates are often carried forward because time and cost pressures make it difficult to pause, and once defects or shortfalls move into the next phase, they become harder and more expensive to resolve alongside live work packages. This creates behavioural pressure to protect the contractual programme, even where quality, assurance or design maturity should require a pause. It also embeds optimism bias on both sides of the contract, because the client's business case and the contractor's bid may both be based on deterministic schedules with little allowance for risk, uncertainty, rework or realistic contingency. The result is that delivery teams start from a baseline that is unlikely to be achievable, creating avoidable tension, claims, rushed decision-making and trade-offs between time, cost and quality.

The answers to questions 4 and 21 are also applicable here.

Interviews with senior stakeholders identify the following influences, particularly in the construction phase:

During construction, poor decisions are often driven by a combination of incomplete information and delivery pressure. Late design information, unresolved interfaces, unrealistic programmes, fragmented subcontract packages, weak product assurance, poor payment practice and excessive value engineering all reduce the space for professional judgement. Reporting pressure and fear of written records can also discourage honest escalation. Over time, these conditions can make non-compliance appear normal, weaken inspection, reduce willingness to stop work and allow speed or cost to take precedence over quality, safety and evidence.

Better construction decisions are supported by conditions that give people authority, information and confidence to act. These include named accountability, capable site leadership, well-administered contracts, strong quality controls, independent inspection with the authority to intervene, transparent records, timely early warnings and a culture in which concerns can be raised without penalty. A reliable single source of truth, operational input, staged delivery and active interface management should not be underestimated. Where these disciplines are in place, decisions are more likely to be timely, evidenced and consistent with safety, quality and whole-life performance.

The Principal Contractor roundtable discussion reinforces the role of procurement and contracting behaviour. Participants described a system in which risk is routinely pushed down the supply chain through heavily amended contracts, lowest-price procurement and legal drafting that transfers responsibility to those least able to control it. This was described as a core cultural and commercial problem in the sector. Such practices can make it difficult for competent contractors to resource supervision, quality control and evidence properly, and they can encourage behaviours that prioritise cost and programme over safety, competence and long-term value.

The behaviour of the client is also crucial. A capable client, supported by competent project professionals, will challenge unrealistically low tenders, insist on competent people, make timely decisions, resist inappropriate value engineering and support the principal contractor when quality or safety requires time or additional evidence. A less capable client or overly passive client can unintentionally incentivise poor behaviour by accepting thin teams, immature design, incomplete evidence or unrealistic programmes.

39. Overall, how consistently do you think the positive behaviours and decision-making necessary in the construction phase are demonstrated in practice? Fairly inconsistently.

Construction accountability and responsibility response

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

During construction, clear accountability is the link between the approved design and the physical building. It makes visible who can instruct work, approve change, accept substitution, inspect hidden elements, raise early warnings, pause unsafe activity and confirm that completed work reflects the approved design and specification. This clarity improves safety, quality, programme control, commercial discipline and confidence in the final asset.

The practical effect is better control at the points where construction risk becomes real. Clear ownership reduces the space between design and site delivery, strengthens control of value engineering and substitutions, improves inspection and test records, speeds up escalation, and reduces later arguments about whether work was instructed, checked or accepted. It also supports better behaviour on site, because people are more likely to raise concerns when they know the route for doing so and trust that those concerns will be acted on.

Construction delivery depends on the client project manager, principal contractor, the construction project manager and subcontractor project managers having clearly defined and connected accountabilities. These roles do not duplicate one another. The client project manager is responsible for protecting the client's requirements, decision rights, funding constraints, statutory obligations and intended outcomes. The construction project manager is responsible for translating those requirements into a coordinated delivery system on site. Subcontractor project managers are responsible for delivering their packages safely, competently and in accordance with the agreed design, programme, quality requirements and evidence expectations. The benefit of defining these responsibilities clearly is that each party understands what it owns, what it must escalate, what it can decide, and where it must interface with others.

The need for individual and organisational roles, responsibilities and accountability to be clearly defined, understood and applied during the construction stage increases with the complexity of the project.

41. What challenges are there in defining, understanding or delivering these roles, responsibilities and accountability during the construction stage?

The main challenge is fragmentation. Construction work is delivered through multiple tiers of contractors, subcontractors, specialists, manufacturers, suppliers, designers, inspectors and client representatives. Responsibility can be split between the principal contractor, project managers, package contractors, temporary works designers, specialist designers, manufacturers, the principal designer, the client and building control. Unless these interfaces are actively managed, accountability can become dispersed precisely where it needs to be strongest.

As with the Principal Designers, contractual, statutory and practical authority do not always align. The person with statutory responsibility may not be the person controlling the daily site decision; the person inspecting the work may not have authority to stop it; and the organisation holding the risk may have priced the work too thinly to resource supervision properly. Whilst there is evidence of good practice across the industry, it is not consistent and there are still too many examples of where titles are being given without authority, duties and risk are delegated downwards, paper competence is accepted without effective assessment, and responsibility often only becomes visible at the point of dispute, claim or inquiry.

As identified in question 24, commercial pressure also has a significant impact. Again, good project management can help with this, but the system, behaviour and culture need to change to support this working in practice.

42. Overall, how consistently do roles, responsibilities and accountabilities appear to be clearly defined, understood and applied in the construction phase? Fairly inconsistently.

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

There are similar issues to Principal Contractors understanding their responsibilities as Principal Designers, see the answer to question 26.

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

There are similar issues to Principal Contractors understanding their responsibilities as Principal Designers, see the answer to question 26.

Some principal contractors are strengthening site assurance, quality records, subcontractor competence checks, change control and Gateway evidence. However, delivery often becomes procedural rather than substantive where the role is under-resourced or where commercial and programme pressure dominate.

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

Construction system infrastructure, transition and contractor regulation response

46. Does the current system of education and training, competence standards and frameworks, and regulation and oversight effectively incentivise and enable appropriate skills, behaviours, accountability and quality of work at the construction stage?

(a) Education and training. The response to question 12 equally applies to construction.

(b) Competence standards and frameworks. The response to question 12 equally applies to construction.

(c) Regulation and oversight. The response to question 12 equally applies to construction.

47. Overall, how effective is the current system infrastructure for skills, competence and regulation and oversight at incentivising and enabling appropriate skills, behaviours, accountability and quality of work in the construction stage? Neither effective nor ineffective.

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

The construction-stage actions that most influence occupation and maintenance are those that determine whether the finished building matches the approved design and whether the evidence needed to operate, maintain and alter it safely is reliable. These actions need to be supported by clear and evidenced decisions around controlling design change and product substitution; inspecting and recording hidden works before they are covered; maintaining the link between design intent, Gateway commitments and what is actually installed; involving operators, maintainers and end users before handover; capturing asset information as the work proceeds; and ensuring that commissioning, training and soft landings are treated as part of construction, not as an afterthought.

The Principal Contractor roundtable also emphasised that transition into occupation is affected by who controls work after completion and during later alterations. Participants noted that higher-risk buildings will have an accountable person responsible for overseeing building safety, and that this role could be used to verify contractor competence or licensing before works are undertaken. This is particularly relevant for minor works, repairs and refurbishments that may not feel like major construction projects but can affect fire safety, compartmentation or building systems. Effective transition therefore depends on a clear route for accountable persons, facilities managers, contractors and principal contractors to share information and update records after each change.

49. Are there particular issues or benefits associated with different approaches to licensing, regulation and registration of contractors and/or subcontractors, including those working on smaller scale or domestic dwellings?

There are clear potential benefits from licensing, regulation or registration of contractors and subcontractors, particularly where work is safety-critical, frequently hidden after completion, or undertaken for domestic and occasional clients who cannot realistically assess competence themselves. A credible registration system can raise baseline standards, make competence visible at the point of work, create a sanction where standards are not met, and give clients a clearer route to identify suitably competent organisations. It can also support better enforcement because there is something meaningful to suspend, restrict or remove.

The principal contractor roundtable offered strong support for a proportionate and risk-based approach to licensing. Participants broadly supported licensing in principle, particularly for higher-risk buildings, but warned that a single undifferentiated model could create barriers to entry for SMEs and micro-businesses. Contributors gave practical examples of small firms carrying out safety-critical works such as fire door replacement, fire stopping, M&E work or works that penetrate compartmentation. These examples show why licensing cannot be based only on company size: it must also consider the risk of the activity, the building context and the potential consequences of poor workmanship.

Participants also highlighted the potential value of building on existing schemes rather than creating a new standalone licensing infrastructure. Examples discussed included the Common Assessment Standard, ISO 9001, ISO 14001, ISO 45001,SSIP, Gas Safe, NICEIC, and trade body technical audits. These schemes also then need to be supported by employers employing competent individuals who have been assessed through professional bodies and demonstrated their competence. The value of these schemes and individual assessments is that they already provide routes for organisational assurance, technical assessment, periodic audit and visible competence. The risk is that they are not always consistently recognised by clients and may become another source of duplicated paperwork unless government gives clear recognition, alignment and enforcement status.

The strongest comparators are rail, nuclear and aviation. Rail uses competence-card models that make an individual's authority to perform specific work verifiable at the point of work. Nuclear uses suitably qualified and experienced person disciplines, with named competence assigned to defined roles. Aviation safety management systems emphasise mandatory reporting, just culture and learning from near misses. These models are not directly transferable to all construction activity, but they demonstrate that registration and assurance can be practical where the work is safety-critical and where the system values competence before work starts.

However, licensing and registration also carry risks. If poorly designed, they can become a paper exercise, exclude smaller competent firms, duplicate existing schemes, increase cost without improving quality, or create false assurance for clients. The system should therefore be proportionate and risk based.

Licensing could usefully focus less on the registration of every individual and more on whether organisations have the capability to create the conditions for successful delivery. This would mean assessing whether a contractor, consultancy or delivery organisation has the governance, leadership, resourcing, supervision, quality assurance, information management, supply chain controls, escalation routes and learning culture needed to support competent work in practice. Many failures arise not because no competent individual is present, but because individuals are placed in systems that do not give them the time, authority, evidence or organisational support to act effectively. By contrast, the regulation or registration of individuals should follow the approach described in [*Delivering Competence and Culture Change across the Built Environment: building*](#) on existing professional body infrastructure, recognised competence frameworks, assessed professional standards, CPD expectations and codes of professional conduct. This would allow organisational licensing to address capability and delivery conditions, while individual registration or regulation makes personal competence, accountability and continuing professional development visible where the role, risk or public interest justifies it.

Any approach to licensing, registration or regulation should be designed across the building lifecycle, not only around the construction phase. Strengthening controls for contractors and subcontractors may be necessary where the work is safety-critical, but this should sit alongside proportionate competence expectations for those who commission, manage and oversee the work. That includes

client-side project managers, procurement specialists and other lifecycle roles that influence decisions across more than one stage.

Construction summary response

50. Thinking about government's vision for a well-functioning system where buildings are safe, high-performing and sustainable; individuals and organisations are enabled to thrive; and the building system is trusted, how significant an impact do each of these factors currently have on delivering these outcomes at the construction stage?

The answer to question 15 also applies here.

51. Thinking about the issues raised in your responses to questions 35-50, what practical changes or actions would make the biggest difference to how construction work is carried out?

The biggest practical changes would be to create a proportionate, risk-based construction competence and licensing system that builds on existing assurance, strengthens client capability and makes accountability enforceable. First, government should clarify the scope and purpose of principal contractor licensing through practical guidance and worked examples. This should explain how the regime applies to new-build higher-risk buildings, refurbishment, fit-out, repair and maintenance, small safety-critical works, occupied buildings, complex buildings and works undertaken directly for end users. The guidance should also explain the relationship between principal contractor licensing, Part 2A competence duties, competent person schemes, trade body audits, Common Assessment Standard-type assurance and Gateway processes.

Licensing should be organisational, proportionate and risk based. The requirements should be scaled to the risk of the work and the building context, not simply to the size of the business. A micro-business carrying out safety-critical work should face proportionate but real competence expectations, while major contractors should be expected to demonstrate more extensive systems, governance, assurance and organisational resilience.

Client capability and procurement should be treated as core construction controls. Clients should be required and supported to understand when they are appointing a principal contractor, what competence evidence they must check, what role the principal designer and accountable person play, and how procurement decisions affect safety and quality. They must also have the capability, either themselves or through professional project managers to help push back on decisions that undermine the original intent of the building.

A formal "construction readiness" checkpoint before work starts on site, supported by a clear duty to maintain design and assurance control during construction should be applied proportionately across projects. This checkpoint should confirm that key design coordination, clash detection, buildability review, competence checks, risk ownership and outstanding technical actions have been completed, rather than being carried forward on the assumption that they can be picked up later. Too often, unresolved work from earlier stages is allowed to pass into construction informally, creating a false sense of progress while transferring risk to the point at which decisions are harder to reverse and defects, delays or compliance issues are more costly to address. Where some matters genuinely need to remain open, they should be recorded, owned, risk assessed and managed through an agreed and visible process, rather than left to construction teams to resolve under live delivery pressures. During construction, the same discipline should continue through regular assurance reviews linked to live work packages, so that design changes, substitutions, sequencing decisions and emerging site risks are assessed by competent people before they affect quality, safety or compliance. This creates a practical industry mechanism for improving accountability at the point where risk transfers from design intent into physical delivery, while supporting better decision-making throughout the construction stage itself.

Construction-stage governance should provide clear routes for escalating emerging risks, revising schedules where evidence shows they are no longer realistic, and ensuring that changes are assessed against delivery capability rather than treated as exceptions to be managed informally. During construction, effective delivery depends on recognising when plans need to change and

managing those changes transparently. Where programmes continue to be driven by assumptions made earlier in the project, teams can be forced to absorb delays, design clarifications or site constraints without sufficient review of their impact. This risks normalising workarounds, compressing assurance activity and weakening control over quality, safety and cost.

52. Of the actions listed in your response to question 51, which one change or action would you prioritise to deliver the greatest impact?

The priority should be to introduce a proportionate, risk-based principal contractor licensing and assurance framework that is explicitly linked to client procurement and enforcement. This would have the greatest impact because it addresses several root causes at once: unclear competence expectations, weak client selection, fragmented assurance, inconsistent accountability and lack of meaningful consequences for poor practice.

Occupation and maintenance response

Skills, knowledge and experience

53. What types of skills, knowledge and experience are needed to carry out occupation and maintenance work?

Occupation and maintenance require a different but equally important competence mix from design and construction. It also includes project and change management capability, because occupation and maintenance are not static activities.

Buildings are continually adapted, refurbished, repaired and reconfigured, often while occupied. Those activities require people who can understand the building's safety case, manage change, control contractors, maintain records, and assess the implications of apparently minor works. It is at this point where project professionals can also be involved, and project competence is needed.

This is particularly relevant to retrofit. Retrofit coordination is often treated primarily as a technical or building physics function, but the role also requires the ability to manage a project: defining scope, sequencing works, coordinating designers, assessors, installers, residents and clients, managing risks and dependencies, controlling change, assuring quality and ensuring that handover and performance monitoring are properly completed. Current requirements for retrofit coordinators focus heavily on the Level 5 Diploma in Retrofit Coordination and Risk Management, or evidence of working towards that qualification through recognised prior experiential learning routes. While that qualification is valuable, many courses focus more on building physics and retrofit risk than on the knowledge, skills, experience and behaviours required to manage projects effectively.

54. In your experience, where are the most material gaps in skills, knowledge, and experience in the occupation and maintenance phase?

The most material gaps are in asset information, client-side capability, project and change management, data management, and the organisational capacity to maintain safety and performance over the life of the building. Too often, occupation begins with incomplete or unreliable handover information. Asset data may be reconstructed at the end of construction rather than captured as work proceeds; design rationale may be lost through novation or staff turnover; and operations teams may receive a 'document dump' rather than a usable body of information explaining what has been built, how it should be operated, and what constraints or assumptions apply.

There is also a significant weakness in estates and facilities capability where organisations are expected to act as intelligent clients for future works. Many organisations rely heavily on consultants and contractors because they do not have sufficient internal capability, structured client-side project management development, or the project, change and service transformation skills needed to manage complex assets and future works safely. This is particularly important where occupied buildings are subject to continual adaptation, refurbishment and maintenance. It creates a risk that technically capable teams may still lack the project and organisational capability needed to manage

lifecycle change, challenge external advice and maintain safety, value and operational continuity over time.

The NAO's report also links capital delivery directly to the condition and performance of the occupied estate. It noted that the New Hospital Programme was launched in the context of years of underinvestment, a deteriorating hospital estate and a large maintenance backlog. Occupation and maintenance cannot be separated from future capital programmes: weak estate condition creates operational risk, drives capital demand and can reduce the ability of services to transform safely²³.

55. Overall, how consistently do you think the skills, knowledge and experience necessary in the occupation and maintenance phase are demonstrated in practice? Fairly inconsistently.

Occupation and maintenance: behaviour, conduct and culture response

56. What most influences behaviour and decision-making when carrying out occupation and maintenance work?

The behaviours in occupation and maintenance work are often influenced by the same factors as other stages and phases in the building lifecycle.

In addition, occupation and maintenance work is often carried out in the most challenging circumstances: buildings remain in use, residents or occupiers are directly affected, access is constrained, and operational continuity has to be maintained. This creates pressure to move quickly, minimise disruption and treat works as routine, even where the implications may be significant. Retrofit, repair and maintenance works are especially vulnerable to this because they may be presented as small jobs or isolated interventions, when in practice they can affect ventilation, moisture risk, fire safety, energy performance, resident wellbeing, future maintenance and the wider safety case for the building. Having the full understanding of implications, supported by good project management is essential.

Poor maintenance and underinvestment can also turn manageable issues into crisis points. When a building condition risk becomes urgent, there is a natural pressure to act immediately, secure the asset, restore services or reassure residents before the full implications of the work have been understood.

Many clients in the occupation and maintenance phase are not expert construction or building safety clients. They may be individual leaseholders, resident management companies, small landlords, school or care settings, local authority teams, housing providers, charities, managing agents or facilities teams whose primary role is to operate a building or service, not to commission technically complex works. This matters because occupation-stage decisions are often made in response to immediate needs: repairs, defects, access issues, resident concerns, maintenance backlogs, retrofit funding windows or urgent safety risks. In those circumstances, clients may find it difficult to understand statutory requirements, assess the competence of contractors or advisers, interrogate technical evidence, or recognise when apparently minor works could affect fire safety, compartmentation, ventilation, structure, moisture risk, energy performance or the wider building safety case. They are therefore often reliant on external specialists, but without a clear, trusted way to verify whether those specialists are competent for the specific role, building and risk context. This strengthens the case for visible competence mechanisms, including recognised professional body membership, assessed competence, CPD obligations, codes of professional conduct, registers or proportionate licensing, so that non-expert clients have a more reliable basis for appointing people and organisations whose competence has been independently tested and is subject to ongoing accountability.

57. Overall, how consistently do you think the positive behaviours and decision-making necessary in the occupation and maintenance phase are demonstrated in practice? Fairly inconsistently.

²³ Source: National Audit Office, Progress with the New Hospital Programme, July 2023.

Occupation and maintenance: accountability and responsibility response

58. What benefits are there when individual and organisational roles, responsibilities and accountability are clearly defined, understood and applied during the occupation and maintenance stage?

The benefits of clear roles, responsibilities and accountability being clearly defined are the same in occupation as for other parts of the building lifecycle, however these also need to reflect that the in-occupation phase is the longest phase and is not static. Where professionals are brought into complete work on a building, in a number of cases these need to be treated as projects. Where significant changes are made then all the implications from the other stages also apply.

59. What challenges are there in defining, understanding or delivering these roles, responsibilities and accountability during the occupation and maintenance stage?

As with other parts of the building lifecycle a significant challenge is fragmentation. During occupation and maintenance, responsibilities may sit across owners, landlords, managing agents, accountable persons, responsible persons under fire safety law, facilities management providers, specialist contractors, resident management companies, leaseholders, public sector estates teams and internal operational departments. In complex organisations, the person with legal accountability may not be the person with day-to-day control of budgets, maintenance, contractor appointments or resident engagement. Unless this is deliberately reconciled, accountability can become difficult to quantify.

60. Overall, how consistently do roles, responsibilities and accountabilities appear to be clearly defined, understood and applied in the occupation and maintenance phase? Fairly inconsistently.

61. How well do accountable persons generally understand their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010 and Articles 13 and 18 of the Regulatory Reform (Fire Safety) Order 2005?

Nothing further to add for this question.

62. How well do accountable persons generally deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010 and Articles 13 and 18 of the Regulatory Reform (Fire Safety) Order 2005?

Nothing further to add for this question.

63. Overall, how consistently do accountable persons understand and deliver their responsibilities under the dutyholder regime set out in Part 2A of the Building Regulations 2010 and Articles 13 and 18 of the Regulatory Reform (Fire Safety) Order 2005

Nothing further to add for this question.

64. Does the current system of education and training, competence standards and frameworks, and regulation and oversight effectively incentivise and enable appropriate skills, behaviours, accountability and quality of work at the occupation and maintenance stage?

(a) Education and training. The response to question 12 is equally applicable. Additionally, the Level 5 Diploma in Retrofit Coordination and Risk Management is an important technical route, but it does not provide sufficient project management competence for all retrofit contexts. Many retrofit coordinator courses focus primarily on the physics of buildings, retrofit risk and technical coordination. They do not consistently require or assess the project management knowledge, skills, experience and behaviours needed to manage multi-party delivery. At minimum, retrofit coordinators should be able to demonstrate appropriate project management competence, supported by recognised professional development routes such as the APM Project Management Qualification or equivalent. For more complex, higher-risk or higher-value retrofit projects, this should be strengthened through progression to, or oversight by, Chartered Project Professionals where appropriate.

(b) Competence standards and frameworks. The response to question 12 is equally applicable here.

(c) Regulation and oversight. The response to question 12 is equally applicable here.

65. Overall, how effective is the current system infrastructure for skills, competence and regulation and oversight at incentivising and enabling appropriate skills, behaviours, accountability and quality of work in the occupation and maintenance stage? Neither effective nor ineffective.

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

During occupation and maintenance, clear roles, responsibilities and accountability are especially important because this is the longest phase of the building lifecycle and one in which many decisions are made by, or directly affect, residents and other lay building users. Residents, leaseholders and occupiers cannot reasonably be expected to understand complex statutory requirements, assess technical competence or judge whether proposed work could affect fire safety, structure, ventilation, moisture risk, energy performance or the wider building safety case. They therefore need a system in which responsibilities are clearly allocated, competence expectations are visible, and those commissioning, managing or carrying out work can demonstrate that they are competent for the specific role, building and risk context. The behaviours and disciplines identified in earlier answers are equally applicable here: transparency, challenge, clear escalation, accurate records, proportionate governance and professional accountability are all needed to ensure that occupation-stage decisions are not treated as routine administration where they may in fact have significant safety, quality or whole-life consequences.

67. Based on your experience of renovation, maintenance and improvement works completed during the occupation stage, is there evidence of particular issues associated with quality, behaviours and accountability?

(a) Quality, workmanship and standards. Nothing further to add for this question.

(b) Behaviours, conduct and professionalism. Nothing further to add for this question.

(c) Accountability, enforcement and redress.

Nothing further to add for this question.
question

68. Thinking about government's vision for a well-functioning system where buildings are safe, high-performing and sustainable; individuals and organisations are enabled to thrive; and the building system is trusted, how significant an impact do each of these factors currently have on delivering these outcomes at the occupation and maintenance stage?

The responses to question 15 equally apply here, with the addition of the retrofit co-ordinator issues identified in the earlier answers.

69. Thinking about the issues raised in your responses to questions 53-68, what practical changes or actions would make the biggest difference to how occupation and maintenance work is carried out?

Nothing further to add for this question.

70. Of the actions listed in your response to question 69, which one change or action would you prioritise to deliver the greatest impact?

Nothing further to add for this question.

Cross-cutting issues, themes and challenges response

Accountability and responsibility

71. How well do directors, managers or other senior officers/staff meet their legal responsibilities as senior officers of organisations delivering dutyholder functions?

Performance is variable. The most significant gap is between knowing and doing. Since Grenfell, senior officers in larger organisations are generally more aware that building safety, dutyholder competence and legal accountability are board-level issues. Those responsibilities now appear more frequently on risk registers, governance papers and assurance plans. However, awareness does not always translate into active leadership, sufficient resourcing or willingness to stop work where competence, information or compliance evidence is not adequate.

APM's local authority briefing indicates that this senior accountability issue is particularly acute in councils. It found that only 45% of project professionals in non-mayoral local authorities agreed that senior management valued project expertise, compared with 90% in Mayoral Combined Authorities. Where senior leaders do not recognise project competence, built environment projects are more vulnerable to weak sponsorship, poor challenge, unrealistic commitments and loss of long-term value²⁴.

In smaller organisations, occasional client bodies and parts of the public sector, legal responsibilities are less consistently understood. A consistent example of the new hospitals programme has been used throughout this response where estates and facilities teams may be expected to commission and operate complex assets, but there is limited structured client-side project management capability, limited professional oversight, and heavy reliance on consultants and contractors. That creates a risk that senior leaders hold legal accountability without the organisational capability needed to discharge it effectively.

Senior accountability should therefore be treated as a live leadership responsibility, not a compliance signature. Directors and senior officers need to be able to evidence how they have assured competence, allocated sufficient time and resource, maintained clear decision making, challenged poor information, and created a culture in which concerns can be raised. At present, good practice exists, but it is not consistently embedded.

Client capability is a recurring issue and has a significant influence on whether projects achieve safe, effective and sustainable outcomes. Clients can and often do bring in external expertise to support them, and competent project management input can have a positive effect where it is engaged early and given sufficient authority. However, reliance on external support should not create long-term dependence or leave the client organisation unable to understand, challenge or act on the advice it receives. Knowledge transfer, capability building and clear ownership within the client body are therefore important parts of effective delivery.

Where clients become overly dependent on contractors or consultants for construction knowledge, they may struggle to protect functional requirements, whole-life value, user outcomes and future maintainability. This creates risk where delivery organisations are incentivised to complete and hand over the asset, while clients, occupants and maintainers live with the long-term consequences of decisions made during design and construction. Future reforms should therefore consider competence across the whole project system, including client-side project leadership and intelligent client capability, rather than focusing only on those directly carrying out technical work.

This should include explicit recognition that project management is not one generic role. Senior officers need to understand whether they are relying on client project managers, construction project managers, subcontractor project managers, programme directors, retrofit coordinators or estates leads, and whether each has the competence, authority and information needed for the specific context. Where those interfaces are unclear, senior accountability can become diluted: the board

²⁴ Source: APM, *But what about the locals? Understanding Project Management in Local Government*, 2026.

believes responsibility has been delegated, the delivery team believes decisions sit with the client, and subcontractors work to narrow package requirements without seeing the wider safety, performance or operational consequences.

Directors and senior officers should therefore be expected to assure the capability of the whole project system, not only the appointment of named dutyholders. That means asking whether the client function can define and hold the brief, whether design maturity has been independently tested before commitment, whether the procurement route rewards competence and whole-life value, whether gateway evidence is being produced as live assurance rather than retrospective document assembly, and whether those managing delivery have routes to escalate bad news without penalty.

Cross-cutting functions

72. Across the building lifecycle, where are individuals' skills, knowledge, experience, behaviours and accountability and organisational capability enhanced or constrained by the way cross-cutting functions are carried out?

(a) Enhanced. Cross-cutting functions enhance competence and accountability where they create a single source of truth, make risk visible early, and connect decisions across the lifecycle. Project management is the clearest example. Done well, it integrates scope, cost, programme, risk, quality, benefits, information and governance so that decisions are made consciously rather than by drift.

The most effective cross-cutting functions are those that link professional judgement to governance. Requirements management, benefits management, risk ownership, procurement strategy, information management, quality assurance, stakeholder engagement and transition planning should not sit in disconnected workstreams. They should be integrated through project, programme and portfolio management so that decisions made at pre-design, design, construction, occupation and retrofit remain aligned with the intended outcomes and statutory duties.

Independent assurance with real authority is particularly valuable because it provides a route to challenge optimism bias, commercial pressure and poor information before those issues become defects or disputes.

For example, on Transport for Greater Manchester interchange work, programme-level controls and risk-based gateway discipline helped successfully coordinate live rail, town-centre, stakeholder and funding interfaces.

(b) Constrained. The same functions constrain delivery where they are fragmented, duplicated, under-resourced or treated as compliance theatre or 'tick box' exercises. Project management is constrained when bought as a commodity on day rates rather than capability, or when PMOs become reporting factories that produce packs but do not support decisions. Assurance is constrained where multiple bodies repeatedly ask for the same evidence without aligning purpose or timing. Planning, building control and gateway processes can also distort behaviour where timescales are unpredictable enough that they become programme risks rather than trusted controls.

These functions are particularly constrained where project management is misunderstood as administration, reporting or a PMO activity rather than as the discipline that connects scope, risk, cost, quality, information, culture and accountability. Grenfell demonstrates the danger of treating project management as a role that can be given to someone without relevant competence or experience. Whilst there are many professional project managers in the built environment doing a significant, professional and value adding role, unfortunately there are still too many individuals who call themselves project managers who do not have the competence to carry out the role. Across the lifecycle, weak project management allows assumptions to pass from one stage to the next without challenge, creating the conditions for later safety, quality, cost and trust failures.

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The role of sector bodies and regulators

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

Professional bodies, sector bodies and regulators should be treated as part of one competence ecosystem, not as separate interventions. In a complex built environment system, the greatest value

of professional bodies is in supporting safe delivery through defining clear competence expectations, providing trusted routes to assessment, supporting career-long development, holding individuals to account through codes of conduct, maintaining professional standards and enabling learning across organisational and professional boundaries.

APM illustrates the role that a professional body can play. As the Chartered body for the project profession, it provides qualifications, the Chartered Project Professional standard, competence frameworks, CPD expectations, a code of conduct, communities of practice, mentoring, research and guidance. These mechanisms help individuals develop, evidence and maintain competence, and provide a route for professional accountability where individuals are members or Chartered professionals.

The Industry Competence Steering Group provides a practical example of this ecosystem approach. Through collaboration between professional bodies, industry groups and regulators, a substantial portfolio of competence frameworks has been developed and managed to support a more consistent competence language across the lifecycle. This work should be built on rather than duplicated, but frameworks will only change behaviour if they are visible in procurement, funding, gateway approval, organisational governance and regulatory expectations.

Professional registers are one practical way to make competence more visible, but they should build on existing professional body infrastructure rather than duplicate it. Many assessed professionals already appear on registers held by their professional bodies, supported by competence assessment, CPD obligations, codes of conduct and disciplinary processes. However, the current professional body model is largely voluntary. It therefore works best for individuals and organisations that already choose to invest in professional standards, but it does not by itself create consistent expectations across the whole market. Government and regulators have an enabling role in closing that gap. As set out in [Delivering Competence and Culture Change across the Built Environment](#), the regulator does not need to hold all individual competence data itself; instead, it could recognise registers that meet common expectations for robust assessment of knowledge, skills, experience and behaviours, ongoing validation, enforceable professional standards and mechanisms for removal where standards are not met. This would strengthen the existing system by giving recognised professional body routes clearer status in procurement, funding, gateway expectations and regulatory guidance, while helping clients and regulators distinguish assessed competence from self-declared experience. The aim should be to turn credible voluntary infrastructure into a more visible and consistently valued part of the competence system, rather than creating a wholly new registration model for every role.

74. Focusing on the current building system, what are the greatest barriers to effective enforcement against individuals and organisations who fail to meet appropriate standards?

(a) Individuals. The main barrier is that many built environment roles do not require registration or professional membership to practise. If an individual is not required to belong to a body, there may be little meaningful sanction beyond employment consequences or litigation. Removing professional membership only affects those who voluntarily opted into the system. Other barriers include that evidence is also difficult to assemble: decisions are often collective, records are incomplete or contested, people move between organisations, and settlement agreements can prevent wider learning. There is also a cultural barrier: individuals may be reluctant to raise concerns if they believe doing so will damage their career.

This is particularly relevant to individuals using project management titles without assessed project competence. Where project management is not regulated or formally recognised, clients may struggle to distinguish between a competent project professional and someone carrying the title without the knowledge, experience, behaviours or authority required for the role.

(b) Organisations. For organisations, barriers include corporate structure, special purpose vehicles, joint ventures, insolvency, insurance-driven settlement, and the absence of a meaningful licence to operate that can be suspended. Accountability can evaporate when project vehicles close, teams disband or liability is settled confidentially. This also prevents the sector learning from failure. For organisations, enforcement is also weakened when competence is treated as a one-off appointment requirement rather than an ongoing organisational capability. A contractor, consultancy, local authority, housing provider or delivery body may employ competent individuals, but still fail if governance is weak, commercial pressures dominate, records are poor, or people are not supported

to challenge. Enforcement therefore needs to consider organisational systems, resourcing, information management, culture and the extent to which senior leaders actively maintain suitable arrangements throughout the lifecycle.

There are areas where enforcement works better. Rail competence cards, nuclear SQEP arrangements and aviation safety management systems create clearer links between role, competence, authorisation and accountability. The built environment should not copy these models wholesale, but it should adopt the principle that people and organisations undertaking safety-critical work should be identifiable, competent for the specific role, and subject to consequences where they fall below expected standards. A systems approach is needed and just having the duty holder roles is not sufficient.

Emerging technology and changing practice

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

Emerging technologies are reshaping the lifecycle by making evidence, risk and performance more visible. Used well, digital tools support better skills, behaviours and accountability because they allow experienced professionals to see the consequences of decisions earlier. On HS2 C23, automated whole-life carbon assessment helped move carbon from an end-of-stage reporting activity into a live design decision, contributing to achievement beyond a contractual 50% embodied carbon reduction target. GIS-enabled biodiversity management moved the same section from a 4.5% net loss to a 14.3% net gain. These are practical examples of technology supporting better decisions, not simply producing better reports.

The APM Project Management Skills Survey 2026 provides further evidence of the pace of change. It found that 88% of respondents think AI skills will be important to them in the next five years, while 43% think AI will be essential in delivering project success in the future. Respondents identified generative AI, predictive analytics, AI-powered resource optimisation, machine learning for risk management and intelligent automation as key areas for future development. This strengthens the case for technology-related CPD that combines digital literacy with ethics, assurance, data quality and professional judgement²⁵.

The greatest barriers are data fragmentation, poor information requirements, inconsistent data quality, cost, lack of digital skills in SMEs and supply chains, professional indemnity concerns around AI, and over-reliance on tools without judgement.

Dashboards and AI outputs can create false assurance if the data is incomplete or wrong. Technology should therefore be treated as a competence amplifier, not a substitute for competence. Emerging technologies also increase the need for competent project management because they change how decisions are evidenced and governed. BIM, digital twins, AI-enabled document review and golden thread systems can improve transparency only if the client has set clear information requirements, the project team maintains data quality, and someone is accountable for how digital evidence is interpreted. Without that project governance, technology can accelerate poor assumptions, hide missing information behind dashboards, or create the appearance of control without improving decision-making.

Shared data and reporting platforms should also be used to make regulation easier to comply with and easier to enforce. Digital tools can reduce duplication where they allow clients, dutyholders, regulators and building control bodies to rely on a common evidence base.

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

Access is uneven. Large organisations can often create their own training, build digital capability internally and provide structured development in tools, project controls, contract administration and

²⁵ Source: APM Project Management Skills Survey 2026

assurance. However, even in large organisations training is vulnerable to programme pressure and is often cancelled when fee-earning work becomes urgent.

The APM Salary and Market Trends Survey 2025 provides additional evidence on emerging technology. It found that 47% of respondents agreed that AI is currently having an impact on project management and their organisation, with the biggest reported impacts being automation of routine tasks, enhanced data-driven decision-making and additional valuable insights. However, the biggest barrier to wider AI take-up was lack of understanding of the benefits, cited by 32% of respondents, followed by fear of data breaches and inadequate regulation. This reinforces the need for AI-related training that covers both practical use and governance, data quality, assurance and professional judgement²⁶.

The APM Business Leader Index Survey 2025/2026 also identifies data literacy as an increasingly important project delivery capability. This is relevant across the building lifecycle because digital records, AI-enabled tools, project controls, asset data and golden thread information only improve outcomes where project professionals and clients can interpret, challenge and use data effectively²⁷.

Access is much weaker for SMEs, subcontractors, occasional clients, local authority teams and parts of public sector estates. These are often the organisations most exposed to competence gaps and least able to fund development. Formal education also lags practice on digital tools, AI, whole-life carbon, building safety duties and data governance. Too much training still teaches tools rather than judgement: how to operate software rather than how to interpret evidence, challenge outputs or make decisions with incomplete information.

The practical implication is that the people with the greatest need for training often have the least access. A future strategy should therefore combine apprenticeships, chartership pathways, accredited degrees, modular CPD, levy flexibility and targeted support for client-side and mid-career capability. It should also ensure that training on emerging technology includes data quality, ethics, assurance, AI limitations and professional judgement.

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

There are useful comparators from other UK sectors and from built environment regimes overseas, but none should be copied wholesale. The most useful lesson is that competence, accountability and learning need to be designed as a system rather than as separate initiatives.

Appendix A provides some useful comparators, including the need for revalidation every 5 years for doctors. The Senior Managers and Certification Regime in financial services is relevant because it links named senior individuals to specific areas of responsibility and requires annual fitness-and-propriety reassessment. Gas Safe is relevant because it combines mandatory registration, renewal, reassessment, inspection and consumer-facing visibility of the precise categories of work an engineer is qualified to undertake.

International built environment comparators provide further lessons. New South Wales' Design and Building Practitioners Act requires registered practitioners to sign compliance declarations, creating a traceable evidence trail through design, variations and completion. The Dutch Wkb model introduces an independent quality assurer from design through construction, backed by municipal stop-work powers. New Zealand's Licensed Building Practitioners scheme licenses practitioners by class of work, requires ongoing skills maintenance, and uses a public register that includes recent disciplinary history. These models are all relevant because they connect competence, accountability, transparency and consequences in ways that are currently less consistent in the UK.

Rail and nuclear provide strong examples of role-based competence and authorisation. In nuclear, the discipline of suitably qualified and experienced persons links named individuals to defined roles and auditable competence expectations. In rail, Sentinel-style competence cards and safety-critical role controls make competence visible at the point of work. These approaches are not directly transferable

²⁶ Source: APM, *Salary and Market Trends Survey 2025*.

²⁷ Source: APM Business Leader Index Survey 2025/2026.

to every building occupation, but they demonstrate the value of making competence verifiable, role-specific and capable of being withdrawn where standards are not met.

Aviation provides a strong comparator on safety culture and learning. Mandatory occurrence reporting, just culture principles and systematic use of near-miss data help create an environment where reporting concerns is treated as a contribution to safety rather than an admission of failure. The Rail Accident Investigation Branch is a valuable model because it publishes independent, non-punitive findings that the whole sector can learn from. The built environment would benefit from a similar visible learning mechanism for serious failures and systemic near misses.

These comparators support a proportionate approach to project management and retrofit coordination. Not every role needs the same form of regulation, but where the work is complex, safety-critical, publicly funded or affects occupied buildings, there should be clearer expectations for assessed professional competence, continuing development and visible accountability. For project management, that should include stronger recognition of APM PMQ, Chartered Project Professional and the built environment project manager competence framework. For retrofit coordination, it supports a risk-based ladder in which more complex projects require demonstrable project management competence, not only technical retrofit knowledge.

Closing questions

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

A new strategy should be designed as an integrated change portfolio, not a collection of separate regulatory, skills and industry initiatives. It should start with a shared vision and objectives, identify lead and supporting bodies, map dependencies, sequence implementation, manage aggregate risk, and communicate consistently through government, regulators and industry. This approach reflects established portfolio management principles and is necessary because competence, culture, skills shortages, gateway approval, professional regulation, contractor licensing, organisational capability and client behaviour are interdependent.

The strategy should have clear ownership, sequencing, dependencies, benefits, risks, communications, assurance and review points. The built environment is already absorbing multiple changes, including building safety reform, gateway processes, competence frameworks, contractor licensing debates, retrofit and warm homes delivery, sustainability requirements, digital transformation and skills shortages. Without a portfolio approach, individual initiatives may be sensible in isolation but collectively create confusion, duplication or capacity pressure.

A further lesson from previous regulatory reform is that clarity and stability should be treated as design principles. Regulations should be outcome-focused, consistently applied and sufficiently stable over defined policy horizons to enable investment, training, procurement and delivery planning. Frequent changes, contradictory expectations or unclear interpretation increase costs and favour larger incumbents with specialist compliance capacity, while smaller competent organisations struggle to participate.

Reform must address the commercial system, not only individual competence. Previous reform programmes have often diagnosed the right problems but failed to change the market conditions that produce them. If work continues to be procured primarily on lowest price, with risk pushed to parties least able to manage it, the system will continue to reward thin teams, under-resourcing, defensive behaviour and late escalation. Government has an important role in changing these conditions by recognising credible professional bodies and the competence standards they maintain. Where professional bodies can demonstrate robust assessment of knowledge, skills, experience and behaviours, continuing professional development, ethical codes, public-interest governance and enforceable routes for sanction or removal, government recognition should make those routes visible in statutory guidance, procurement policy, funding conditions, gateway expectations, approved registers, insurance discussions and public sector capability assessments. This would help shift competence from a voluntary professional signal into a market expectation, giving clients clearer ways

to identify assessed professionals and organisations while rewarding those who invest in professional standards, CPD and accountability. It would also help prevent higher-standard providers being undercut by those who do not carry the same obligations, while still requiring project-specific due diligence and proportionate assessment of organisational capability.

Do not create another disconnected framework. There are already many competence frameworks, standards, professional routes and sector schemes. The problem is not the complete absence of frameworks; it is fragmentation, inconsistent terminology, lack of mutual recognition and weak market adoption. The strategy should consolidate what exists, align professional bodies and standards bodies around ICSG competence frameworks aligned to BS8670 Part 1, and make those frameworks visible in funding conditions, procurement, gateway approval, professional assessment, carding schemes and contract requirements. Competence should become something the system requires, not something only motivated individuals pursue.

This is especially important for project management, where useful routes already exist but are not consistently required. The strategy should not invent a new project management framework for the built environment when the APM Competence Framework, Chartered Project Professional standard and competence framework for project managers in the built environment already provide strong foundations. The priority should be adoption, recognition and use in procurement, regulation, funding and organisational governance.

Treat the client as the control point of the whole system. What happens before contract award largely determines what follows. Crossrail learning legacy, Stewart Review findings, Old Oak Common experience and New Hospital Programme examples all show that client capability, brief stability, design maturity, commercial strategy and decision rights are decisive. Any strategy that reaches only professions and trades, but not clients, sponsors and public bodies, will miss the main point of leverage.

However, people and organisations may become clients, building owners, accountable persons, landlords, leaseholders or resident management bodies by virtue of ownership, occupation, funding or statutory responsibility; competence cannot be a pre-condition for holding those roles. The system must recognise the practical consequences of that reality. Many clients and owners will not have the in-house technical, commercial or project capability needed to define requirements, assess competence, challenge assumptions or understand the implications of decisions across design, construction, occupation, maintenance and retrofit. Reform should therefore focus on making competent support easier to identify and use. Professional project professionals, designers, contractors, facilities specialists and other competent advisers can help clients discharge their responsibilities by translating duties into practical governance, clarifying decision rights, testing readiness, managing risk and ensuring that evidence is understood before commitments are made.

This principle extends beyond new build into occupation, maintenance and retrofit. Clients and building owners often make decisions that determine whether work is treated as a coherent project or as a series of isolated tasks, even where those tasks may affect fire safety, structure, ventilation, moisture risk, energy performance, resident wellbeing or the wider safety case. Poor maintenance, underinvestment and crisis decision-making can create pressure to act quickly before consequences are fully understood. Where clients lack specialist expertise, proportionate access to competent professional support is essential, not as a substitute for ownership, but as the means by which ownership can be exercised responsibly.

The risks to avoid are: assuming that all clients can become technically expert; treating appointment of dutyholders as a transfer of responsibility; relying on voluntary professional engagement to solve a whole-market problem; creating more guidance without clear routes to competent support; focusing only on professions and trades while ignoring client-side capability; and allowing confidential settlements to prevent sector-wide learning.

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

Project management should be recognised as a core built environment competence, not an administrative support function. Many of the issues identified across this response are failures of

integration, decision-making, requirements management, commercial discipline, risk ownership, transition and benefits realisation. These are project, programme and portfolio management issues as well as technical building issues. A safer and more trusted system therefore requires competent project professionals across the lifecycle, including client-side, design, construction, subcontractor, occupation, maintenance, retrofit and decarbonisation roles.

It is important, however, that project management is not treated as one generic role. Client project professionals, construction project professionals and subcontractor project professionals each operate from different positions in the system and need clearly defined accountabilities, interfaces and escalation routes. Retrofit coordinators, estates leads and programme directors may also be managing change with significant safety, resident, operational and whole-life consequences. Competence expectations should therefore be linked to role, context, complexity, public value and lifecycle impact.

Any future recognition or regulatory model should be risk-based and proportionate. It should not assume that every project manager, contractor, designer or retrofit coordinator requires the same intervention. Instead, expectations should increase where projects are complex, safety-critical, publicly funded, undertaken in occupied buildings, or where clients and occupants cannot reasonably judge competence for themselves. This would focus effort where failure has the greatest consequences while avoiding unnecessary barriers for competent SMEs.

Formal recognition should also be used to correct market failure, not to create another layer of bureaucracy. At present, individuals and organisations that invest in assessed competence, CPD, ethical practice, professional standards and organisational capability can be undercut by lower-standard providers who do not carry the same obligations. Government can help change those market conditions by recognising credible professional bodies and the standards they maintain through statutory guidance, procurement policy, funding conditions, gateway expectations, recognised registers, insurance discussions and public sector capability assessments. This would make competent project leadership and management easier to identify, procure, fund and hold to account.

That recognition should build on existing infrastructure rather than create a disconnected system. For project management, the APM Competence Framework, Chartered Project Professional standard and the competence framework for project managers in the built environment provide strong foundations. Government recognition would not remove the need for project-specific due diligence, but it would give clients a stronger first filter than job titles, self-declared experience or lowest-cost appointments. It would also help clarify the professional identity and public profile of project management, distinguishing competent project leadership and management from activity-level coordination or reporting.

Governance should also be dynamic and proportionate. The aim should be “minimum viable governance”: enough structure to make responsibilities, risks, decisions and evidence visible, but not so much process that leadership, innovation and productivity are crowded out. Repeatable safety-critical tasks may require clear command-and-control. Project leadership, design trade-offs, procurement strategy, stakeholder management, retrofit and change in occupied buildings require empowered professional judgement within clear accountability boundaries. Both forms of governance are legitimate, but they must be applied in the right place.

Regulation and governance should also include continuous review and improvement. If today's processes are still being followed perfectly in ten years' time without adaptation, that may indicate stagnation rather than success. Standards, assurance expectations and competence requirements need feedback loops so they can respond to live delivery, technology, AI, data capability, climate expectations, market conditions and lessons from projects. Gateway processes and dutyholder requirements should support learning and proportionate decision-making, not simply retrospective evidence assembly.

Project professionals should be recognised as leaders of change. Projects, programmes, retrofit, decarbonisation, major refurbishment and complex occupied-building works all require people who can explain the purpose of the work, build shared understanding, manage trade-offs, communicate risk, and help clients, users, contractors, regulators and supply chains understand the value the project is intended to create. No amount of bureaucracy can substitute for that leadership function.

The competence problem is solvable, but only if the commercial, regulatory and professional systems are aligned. A future strategy should make competent practice easier, poor practice harder, and learning from failure visible. It should support safety, accountability, productivity and long-term value by ensuring that the right people, with the right competence, judgement and authority, are leading, integrating and working on built environment projects.

Good Practice Comparators: Strategy for the Built Environment Professions, Trades and Occupations

Table 1: Good Practice from Other UK Sectors

Comparators drawn from sectors outside the built environment, mapped against the recurring themes of accountability fragmentation, competence assurance and information asymmetry raised throughout the call for evidence.

Sector / Scheme	Accountable authority	CPD, one-time, or hybrid?	Mandatory or voluntary?	Who is responsible for compliance? / Other relevant information
Healthcare GMC revalidation Regulatory process where licensed doctors confirm they are fit to practice every five years	General Medical Council (independent statutory regulator), acting on a recommendation from a “Responsible Officer” inside each doctor’s employing/designated body	Hybrid. Initial registration plus a mandatory 5-year revalidation cycle built on annual appraisals. The GMC does not mandate a fixed number of CPD points; activities must be tailored to the doctor’s own scope of practice.	Mandatory, revalidation has been a requirement for all licensed UK doctors since December 2012	Split individual/organisational responsibility: the doctor gathers and reflects on evidence; the designated body appoints a Responsible Officer who has a statutory duty to make the revalidation recommendation to the GMC. Persistent non-engagement with revalidation can itself become a fitness-to-practise concern — administrative non-compliance is directly linked to the right to keep

Sector / Scheme	Accountable authority	CPD, one-time, or hybrid?	Mandatory or voluntary?	Who is responsible for compliance? / Other relevant information
				practising. Closest UK model to “competence is never a one-off.”
Financial services Senior Managers & Certification Regime (FCA/PRA)	FCA and PRA jointly; each named “Senior Manager” (SMF) is individually pre-approved by the regulator	Hybrid. One-time regulator approval on appointment, plus an ongoing personal “Duty of Responsibility” and at least annual fitness-and-propriety reassessment.	Mandatory for all FCA/PRA-authorized firms	The named individual, not just the firm, carries liability: every SMF holder has a Duty of Responsibility, so if the firm breaches a requirement, the SMF for that area can be held accountable if they didn't take reasonable steps to prevent it. Firms must maintain a Management Responsibilities Map. A Senior Manager can be personally liable even if not personally involved, if they failed to discharge this duty. The sharpest existing UK model for solving “fragmented accountability”, one named person owns each risk area.
Domestic trades — Gas Safe Register	Operated by Capita under contract to the Health and Safety Executive,	Hybrid. Initial ACS qualification, 5-yearly ACS reassessment, annual	Mandatory by law, operating unregistered is a criminal offence	The individual engineer holds and renews their own registration; Gas Safe inspectors monitor competence through risk-based proactive

Sector / Scheme	Accountable authority	CPD, one-time, or hybrid?	Mandatory or voluntary?	Who is responsible for compliance? / Other relevant information
	which retains statutory oversight	registration renewal, and a compulsory 3-month probation period for new entrants.	carrying an unlimited fine and up to 6 months' imprisonment	inspections and investigate complaints. The ID card shows the specific categories of work an engineer is qualified for, so scope-of-competence is legible to the consumer at the point of hire — a low-cost fix for the information asymmetry the call for evidence flags repeatedly for domestic RMI work (Q53–67).

Table 2: Good Practice from the Built Environment in Other Countries

Comparators drawn specifically from built environment regulatory regimes in other jurisdictions, each addressing accountability, competence assurance or consumer redress in ways not currently mirrored in England.

Sector / Scheme	Accountable authority	CPD, one-time, or hybrid?	Mandatory or voluntary?	Who is responsible for compliance? / Other relevant information
Australia (NSW) — Design and Building Practitioners Act 2020	NSW Building Commissioner / Secretary of the Department of Customer	Largely one-time gatekeeping. The Secretary must be satisfied as to the applicant's qualifications,	Mandatory for defined building classes (2, 3, 9c) — a comprehensive public register of	The individual registered practitioner personally signs a “compliance declaration” at each stage; only the building practitioner can lodge the final building compliance

Sector / Scheme	Accountable authority	CPD, one-time, or hybrid?	Mandatory or voluntary?	Who is responsible for compliance? / Other relevant information
	Service, with statutory investigation and stop-work powers	skills, experience and insurance before registering them; registration can be varied, suspended or cancelled.	designers, engineers and building practitioners	declaration, and this task cannot be delegated. Providing a false or misleading declaration carries a maximum penalty of \$220,000, and anyone giving a declaration must be adequately insured. Creates a traceable, individually-signed paper trail through design, every variation, and completion — directly answers the call's concern about accountability being lost across stage handovers.
Netherlands — Wkb (Building Quality Assurance Act)	An independent, certified private “quality assurer,” overseen by the national Admission Organisation for Building Quality Assurance; the municipality keeps a	Hybrid, organisational rather than individual. The assurer is a certified company using a government-approved assessment “instrument,” engaged from design through to completion of a single project.	Mandatory since 1 January 2024 for the lowest-risk new-build class (single homes, simple commercial premises); expected to extend to higher-risk classes and renovations over time	The independent quality assurer assesses risk before construction starts, sets required measures, then follows the build on site; if the assurer or municipality sees a problem, the municipality can halt construction. The Dutch Civil Code was also amended to increase the builder's liability for construction defects alongside the assurer's oversight — tackles weak consumer redress and fragmented design-to-

Sector / Scheme	Accountable authority	CPD, one-time, or hybrid?	Mandatory or voluntary?	Who is responsible for compliance? / Other relevant information
	fallback stop-work power			construction oversight in the same reform.
New Zealand — Licensed Building Practitioners (LBP) scheme	The Building Practitioners Board and a Registrar appointed by MBIE's chief executive, who license, audit and discipline practitioners	Genuine hybrid. Initial competency assessment for licensing, plus a mandatory set of "skills maintenance" activities every two years that must be completed before a licence can be renewed.	Mandatory for "restricted building work" — since March 2012, homes and small-to-medium apartment buildings require a licensed practitioner for work critical to structural integrity	The individual LBP, licensed in one of several discrete classes (e.g. carpentry, roofing, site supervision), must issue signed memoranda to both the owner and the council identifying who did or supervised the work. The public register lets anyone check a practitioner's licence class and view disciplinary history for the last 3 years — a consumer-facing competence signal. The class-based structure mirrors the call's recognition that many roles span more than one lifecycle stage.

Note: all factual claims are sourced from official regulator publications and government guidance current as of July 2026.