

# Association for Project Management

## Single Construction Regulator Prospectus Response

---

### Chapter 1: Our vision for a future regulatory system

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

The Grenfell tragedy and subsequent inquiry highlighted the failures and fragmentation of the system and APM welcome the prospectus for the new construction regulator and the holistic approach it is taking.

The outcomes proposed are all very useful in moving industry and building safety forward.

- Buildings and built environments are safe, high-performing and deliver a healthy, accessible, secure, and sustainable environment for occupants.
- Companies and individuals are enabled to thrive when they operate in the interests of current and future building users.
- Products for building are fit for their purpose and users are provided with accurate product information.
- The building system is trusted; users have confidence the system will act to prioritise the safety and needs of occupants.

All of these outcomes are equally essential and operate as an interconnected ecosystem. Each outcome reinforces the others, and none can be fully effective in isolation—progress depends on all of them working together.

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

As highlighted in the prospectus, it is *'the responsibility of government and the regulator to improve coherence and reduce fragmentation, it is the responsibility of all those in industry to raise standards from within the sector, to prevent dishonest actors, like those highlighted by the Inquiry, from avoiding accountability for their actions'*

Since Grenfell, APM has played a leading role in industry wide competence initiatives, including gaining agreement across industry as to minimum competences required for project managers in the built environment and supporting the implementation of these. APM's Head of Technical Content has also invested time to manage and lead the work of the Industry Competence Steering Group between January 2024 and March 2026, helping to ensure consistency and coherence in addressing competence requirements from construction products through to demolition and disposal of an asset, including in occupation. Through the work of the ICSG a portfolio of over 200 competence frameworks is being managed utilising the skills and expertise of around 2000 volunteers.

Whilst we recognise that not all professional bodies have performed as expected over the years, the value of those who have performed well should not be overlooked. As an exemplary professional body, whose focus is on public benefit, APM will continue to raise standards, work with industry, monitor the effectiveness of activities and work with government to develop a profession that enables the delivery of the outcomes of the regulator. This speaks specifically to the objective of creating an environment where companies and individuals are enabled to thrive when they operate in the interests of current and future building users.

APM takes our role as a professional body and the part we play in raising standards seriously. APM already operates as a Chartered body with a robust code of conduct that is enforced when members or ChPPs are in breach of this. We already have in place a robust Chartered Standard that is supported by professional qualifications that help people develop during their career. This is supported by communities of practice, mentoring, research and the development of good practice, enabling professionals to remain up to date and their competence levels current.

The role of project management should not be underestimated. The project profession is made up of many specialists at different stages of their careers, who have entered the field via diverse routes. The profession is a key contributor to the UK economy and society, with an estimated 2.32m FTEs currently employed in the UK (8.5% of total UK FTEs), and £186.8bn of GVA generated annually (9.2% of total UK GVA).<sup>1</sup>

There are many competent project professionals that are working across the globe delivering projects safely, effectively and delivering value. However, the project profession faces two challenges when it comes to competent individuals managing and leading all projects. Firstly, as identified in the Grenfell Inquiry Phase 2 report, there is the need to address the misconceptions around project management and upskill those in project manager roles who don't have the knowledge or skills to be able to deliver this safely and effectively. Whilst a lack of project management, and an absence of professional project managers, were not the reason the Grenfell tragedy happened; it was certainly a contributing factor. The Grenfell Inquiry report is clear that those responsible for the management of the projects did not have the competence to do so. They were not professional project managers. Indeed, the Grenfell Inquiry Phase 2 report states:

*'50.41 Simon O'Connor was project manager for the refurbishment until September 2015. **The Grenfell Tower refurbishment was the first project for which he had taken on the role of project manager.**'<sup>2</sup>*

*'65.14 Ben Bailey lacked the competence and experience to act as Harley's project manager on a project of the size and complexity of the Grenfell Tower refurbishment. **Ben Bailey was at the time a 25-year-old graduate with a foundation degree in motor sport engineering, who had not previously held the position of project manager and had no obvious qualifications for the role.**'<sup>3</sup>*

*'67.23 Any substantial construction project needs to be managed by or on behalf of the client and unless the client has the necessary experience and skill to undertake that task, it will usually appoint a professionally qualified project manager. In the present case Artelia would have been willing to act as project manager, but the TMO persuaded itself that it could perform that function itself. That was a mistake because*

---

<sup>1</sup> PWC (2024) The Golden Thread: A Study of the Contribution of the Project Profession to the UK's Economy. Association for Project Management. <https://doi.org/10.61175/BNIP1316>

<sup>2</sup> [Grenfell Tower Inquiry Report: Phase 2 report \(Volume 4\)](#), 4<sup>th</sup> September 2024

<sup>3</sup> [Grenfell Tower Inquiry Report: Phase 2 report \(Volume 4\)](#), 4<sup>th</sup> September 2024

*it did not have the necessary skills or experience to undertake that task and to ensure that Rydon, and through it the other professionals involved in the refurbishment, carried out their work effectively.*<sup>4</sup>

Secondly there is the need to recruit more people into the profession to address the skills shortages. Project management-oriented employment (PMOE) - including both traditional project professionals and those in less formal roles - accounts for 90 million jobs worldwide, and an additional 25 million project professionals will be needed by 2030 to meet increasing project demand and demographic shifts<sup>5</sup>

We see the introduction of the single construction regulator as an opportunity to assist in addressing the challenges outlined above, with APM and the profession working closely with Government and the Single Regulator, helping to ensure that those who are taking on the project management roles have the competence to do so.

### 3. *What will be the most important factors to achieving the proposed outcomes?*

The prospectus makes reference to the built environment eco-system as well as a regulatory system. It is vital that a systems thinking approach is taken to defining and implementing the single regulator, to avoid the pitfalls of fragmentation that has enabled the current situation to develop.

In complex domains like the built environment, the parties (companies, consumers, technologies and regulator(s)) are constantly interacting, responding dynamically to the potentially conflicting requirements (e.g. cheap and easy to use versus safe, durable and cosmetically attractive) goals of each type of party. Attempting to regulate piecemeal is likely to change behaviours in ways not anticipated, possibly resulting in the opposite effect to that wanted, as Grenfell Tower proved.

A single regulator applying systems thinking can:

#### **1. Manage Emergent Behaviour**

In complex systems, the whole is greater than the sum of its parts. New behaviours arise from interactions rather than from any single entity.

- A regulator focusing on individual parties' compliance might not expect a systemic response (e.g. tax breaks for hybrid cars saw an upswing in large PHEVs with negligible EV range, not reducing CO<sub>2</sub> footprint) caused by how those parties interact.
- Systems thinking allows a regulator to monitor and identify early-warning signals and patterns of behaviour across the entire range of parties, allowing the fine-tuning of regulation to counteract adverse trends and boost positive trends.

#### **2. Prevent Unintended Consequences**

Traditional regulation often suffers from **linear thinking**: *"If we pass Law X, we will get Result Y."* However, such simple changes in complex domains often produce counter-intuitive results.

---

<sup>4</sup> [Grenfell Tower Inquiry Report: Phase 2 report \(Volume 4\)](#), 4<sup>th</sup> September 2024

<sup>5</sup> Project Management Institute, 2021, Talent Gap: Ten-Year Employment Trends, Costs, and Global Implications

- Strict safety regulation can easily lead to both resentment and complacency, where people feel so safe that they take more risks, effectively neutralizing the regulation. The sharp ending of the first two COVID lockdowns led to a rapid rise in COVID infection rates.
- By mapping out **reinforcing** and **balancing feedback loops**, designers can predict where a new regulation might trigger a counter-productive effect elsewhere.

### 3. Address Silos

Complex domains rarely display neat boundaries.

- Without systems thinking, you end up with regulatory silos, creating gaps that will be exploited for financial gain and "red tape" that hides the underlying problems under mountains of administration.
- A systems approach treats the regulation of the industry as an integrated ecosystem. It ensures that the information about different aspects is seamless and the overall outcome of regulation is clearly visible.
- The regulator must be empowered, and enabled, to monitor the complete situation and respond accordingly in a continuous, systemic basis, so building responsiveness and resilience to rapid evolution of behaviours in the industry. Static rules-based regulation based on a static snapshot of the industry will become obsolete almost instantly.
- Systems thinking moves the regulatory goal from "static stability" to "dynamic resilience." It supports **agile regulation**—the ability of the authority to sense changes in the environment and correct or exploit them.
- It embeds "sensing mechanisms" into the regulatory design, allowing the regulator to learn and adapt its own rules in real-time as the domain evolves.

Cognisance also needs to be given to the work that has already taken place under the Building Safety Regulator and the National Regulator for Construction Products and the volume of change that industry can handle. It is unclear whether the prospectus is focusing on a single body or a single system of regulation. If the intention is to look at a single body, then the cultural aspects of merging bodies together needs to be factored in and managed closely.

To achieve the outcomes outlined, policy and delivery need to be aligned. The recent APPG report *Building a Better Future: Inquiry into improving the delivery of national infrastructure projects*, identified a 'valley of death' between policy and delivery and to address this a major shift is needed that embeds project delivery into every corner of the system<sup>6</sup>. Whilst this finding was specifically in relation to infrastructure, the same principles apply in this situation, particularly when addressing such a complex system such as the built environment. Not only does delivery need to be embedded, but it needs to be delivered by competent project professionals, ideally those who hold ChPP, or are working towards it.

The changes need to be underpinned by an established change model, incorporating both push and pull factors. Prosci's ADKAR (Awareness, Desire, Knowledge, Ability and

---

<sup>6</sup> *Building a Better Future: Inquiry into improving the delivery of national infrastructure projects: All-Party Parliamentary Group on Project Delivery November 2025*

Reinforcement) model (adapted below) can provide a useful structure for underpinning this.

**Awareness** of the change. This starts by people being aware of the requirements under the Building Safety Act, the requirements of the regulator and changes required.

**Desire** to change – there has to be a clear benefit, including a ‘what’s in it for me’, so individuals make a conscious effort to buy into supporting the change. There needs to be incentives to be competent, demonstrate competence and/or sanctions for not demonstrating competence as well as allowing sufficient time and resource to manage projects that deliver safe outcomes, for example.

**Knowledge** – this relates to having a clear definition of competence, for example, and knowing and understanding expectations.

**Ability** – this relates to being able to demonstrate competence and other requirements from the legislation and the Regulator. That there are accessible ways to demonstrate and record competence, for example and for other people to check competence before recruiting or awarding contracts.

**Reinforcement** - this relates to consistent messaging and communications across government, the regulator and industry, as well as sanctions if people are not doing what they should.

Industry has been through a raft of changes since Grenfell. Where there is existing infrastructure and engagement, these should be built on rather than replaced. With regards to products, there is some excellent work as part of the CCPI initiative, and for professions, there are good examples of where professional bodies are performing and raising standards in industry. Where the existing ecosystem is working well, this can be used to support the changes required. This is strengthened further when professional bodies are also open to collaboration and working together, for example the lead APM has taken in developing a competence framework for project managers in the built environment that ensures alignment across different parts of the profession and one version of the truth between APM, CIOB and RICS.

Any requirements that are put in place to support the outcomes also need to be adaptable and be able to respond to a changing industry, for example with the increased use of AI and data. This lends itself more to outcomes-based approaches rather than detailed specific requirements trying to cover all the needs of the built environment.

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

A number of changes have been brought into the industry since Grenfell; some have been more successful than others. Lessons need to be learnt from the issues that impacted the introduction of the Gateway process and regulation of building control. It needs to be actively demonstrated that these lessons have been learnt, otherwise there will be an instant barrier to people being willing to embrace any changes.

Lack of communication, clear guidance and clear expectations have hampered existing efforts to bring about changes in the industry and unless these are addressed, this will also be a barrier.

The remit of the single construction regulator is wide, including being able to prevent rare catastrophic events such as those impacted by fire and structure, but also the more

widespread, chronic harms that can result from factors such as air quality, thermal performance and toxicity. Risk to all segments of the population must be considered, for example children and disabled people. Current and future risks such as poor climate resilience and use of AI must also be factored in. Each of these areas has its own complications and a proportionate approach that is relevant needs to be taken. Unless this is looked with a systems approach, as outlined above, the most significant barrier will be fragmentation.

The risk of fragmentation also applies to the approach to competence. If reforms unintentionally encourage the creation of alternative schemes or separate competence assurance models, the industry could face:

- inconsistent competence thresholds
- confusion among clients, contractors, and residents
- higher costs and administrative burden
- reduced trust in what “competent” means
- repetition of errors of the past

As highlighted above, competent project professionals need to be at the heart of delivering the changes (to prevent poor delivery being a barrier to adoption) along with sufficient resource at the regulator to deliver the work required. This can be supported through a partnership approach with industry, building on existing infrastructure and industry engagement that has built up since Grenfell.

There will always be those that do not embrace new requirements unless there is an element of force. Any requirements need to have enforcement with consequences and for that to be visible. If this is not the case we will remain in the situation where ‘the good get better, and the rest don’t bother’. There are sanctions already within the Building Safety Act, however the impact of these have not been felt across industry.

All parties within the built environment need to understand their roles and responsibilities. This starts with Clients, unless this is addressed, then risks are introduced throughout the pipeline from day one.

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

The following information is provided as examples of the data that could be collected for each of the outcomes:

- Buildings and built environments are safe, high-performing and deliver a healthy, accessible, secure, and sustainable environment for occupants.
  - a. Lack of catastrophic events
  - b. Feedback from residents
  - c. Number of defects
  - d. Medical trends
- Companies and individuals are enabled to thrive when they operate in the interests of current and future building users.
  - a. Uptake in competence assessments
  - b. Feedback from corporate organisations
  - c. Sanctions brought against bad actors
  - d. Recruitment and retention in industry, apprenticeship outcomes, outcomes of levy funding

- Products for building are fit for their purpose and users are provided with accurate product information.
  - a. CCPI data
  - b. Procurement
  
- The building system is trusted; users have confidence the system will act to prioritise the safety and needs of occupants.
  - a. Feedback from residents
  - b. How quickly issues have been resolved
  - c. Levels of satisfaction

## **Chapter 2 (2.4 Digital, Data and Efficient Regulatory Delivery)**

6. Have you experienced any challenges with providing information via government digital services when complying with current regulatory requirements across products, professions and buildings?
  
7. *How should the new regulator promote consistent digital standards and interoperability across the lifecycle of a building (including products, professions and buildings)?*

Those that operate professionally and have had their competence assessed, often appear on professional registers held by the relevant professional body. Whilst this can be checked by individuals and organisations before awarding contracts, making these registers more centrally available will add to the consistency of message around the need for competence.

If there were consistent requirements for professional bodies, for example:

- Competence assessment includes an assessment of skills, knowledge, experience and behaviours and there is a process of ongoing (re) validation
- There is a way of removing individuals from the registers if needed
- The professional body agrees to a code of conduct in relation to the delivery of assessments, including ensuring valid, reliable, authentic, current and sufficient assessments

There should not be a requirement for the Regulator to hold all the data of each of the individuals on the registers or keep the registers up to date. This should sit with the professional bodies in relation to the relevant profession.

8. What digital tools and platforms do you find most effective for ensuring you meet regulatory compliance and why?
  
9. What are the opportunities and risks associated with automating regulatory compliance checking (e.g. AI-driven assessment), and how should oversight, accountability and human review be retained within automated systems?

## 2.5 Residents

10. Should the regulator play a role in setting behavioural standards and providing foundations for enforcement? If so, how should it do this e.g. via powers or duties?
11. How can the regulator protect residents, enabling them to effectively exercise their rights to seek redress to make their homes safe, without fear or confusion?
12. How can the regulator monitor the impact the regulatory system has on the safety of residents?
13. What should the regulatory system do to better share information between regulatory bodies to inform and support the delivery of resident-based outcomes?
14. How can the regulatory system better support and advise residents?

## Chapter 3: Roles and responsibilities in an integrated regulatory system

We would welcome your views on the roles of actors within the ecosystem.

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

We agree with the roles and responsibilities set out for government, regulatory bodies and industry and support the fact that these 3 elements need to work together to implement the change.

The roles and responsibilities speak to the strengths of each party, with government acting as the steward and in a key role for ensuring a number of the barriers identified above can be addressed. Additionally, to the roles outlined, it should be noted that government also has a role as a client and has a huge influence over procurement, business models and setting out requirements that lead and direct the delivery.

The roles and responsibilities of the regulator make sense, however there would need to be significant changes from existing approaches within the regulator to enable this to happen, particularly around being role model, continuous improvement and enforcement.

We are very supportive of the roles outlined for industry, specifically around industry acting as equal partners in system-wide reform and the acknowledgement that success also relies on industry ensuring that they have a competent workforce and setting the standards for the behaviour and culture necessary to drive change. By working closely with government and the new regulator, industry can support changes and assist in achieving the desired outcomes made in the Inquiry recommendation.

Professional bodies, such as APM are positioned really well to support this aim and we encourage government to build on existing infrastructure where this is working well. Whilst professional bodies can and do discipline members where issues are raised, this currently only extends to those who are members or Chartered professionals. Whilst appreciating that there will be a further call for evidence around regulating professions, the role and remit of professional bodies should not be underestimated, not only in assessing competence, but also in delivering value in relation to communities of practice, research, CPD, mentoring and growing the professions, for example. It is vital that the impact this has on competence is not overlooked.

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

As outlined above, taking a systems thinking approach to this is critical. The paper published by APM in May last year [Delivering culture change and a competent workforce across the built environment](#) sets out an approach for government, industry and the regulator working together.

It is not just for the regulator and industry to work together, but a three-pronged approach for government, regulator and industry. As outlined above, the government also has a key role with regards to being a client and the procurement and business models that are employed. By leading from the front, government can set the expectations for wider industry.

The approach taken to the regulation of professions is also going to be a driving force in change. There is a significant amount of work that has already taken place in industry to change the culture and move away from 'the race to the bottom', but more needs to be done. We welcome that this is recognised in the prospectus and agree that it should be built upon.

In terms of the regulator supporting industry, there are some key areas that need to be delivered including:

- the regulator must listen to and act upon concerns raised taking on board the expertise in industry in the work it undertakes
- Being clear on the roles and responsibilities and purpose of statutory committees
- Be clear and consistent in communications and expectations
- Work with industry to provide support and guidance to industry
- Realise that whilst there are many engaged with the work of ICSG and other groups moving industry forward, there are many that are not engaged and just monitoring the activity of those engaged is not sufficient
- Appreciate that industry is not a homogenous group and different approaches may be needed for different parts of industry

In terms of incentives or sanctions, these will not work in isolation and need to be part of a broader systems approach. There are already sanctions in the Building Safety Act, so thought needs to be given as to whether additional sanctions are needed or the existing sanctions just need to be enforced. Ultimately if the conditions are enabled that allow people to deliver safe and compliant buildings and not been consistently undercut or unable to do the right thing because it is too expensive, then this should be incentive enough.

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

In terms of preparedness, it is very much a mixed economy, those that know, are aware and are engaged, those that are unaware and those that won't change unless forced to. Clients, business models, procurement and insurance all have a key part to play in driving change across industry, however this also needs to be supported by a strong regulator and clear government priorities as set out in the prospectus.

As with bringing in any change, there needs to be clear expectations, timelines, ease of process, infrastructure in place to support delivery of changes, not just within government, but also using and working with existing infrastructure. There is a solid basis of engaging with professions through professional bodies, who are also well placed to support not only the assessment of competence, but also the ongoing development of practice and maintenance of competence through membership, CPD, research, communities of practice and mentoring, for example.

Building on the BSi competence hub, there needs to be a central point for industry to access information, guidance and also case studies, as this helps to contextualise the implementation of changes.