

ICC CLIENTS PRINCIPLES – FEEDBACK FORM

Version	1.0
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Overview

The Building Safety Act 2022, and the subsequent addition of Part 2A into the Building Regulations 2010, established clear expectations of clients as dutyholders, recognising their important role in shaping safe buildings. Many clients want to do the right thing, but may not always be sure what diligent, informed and proportionate client behaviour looks like in practice.

The Industry Competence Committee (ICC), working alongside the Building Safety Regulator (BSR), has developed a set of Principles for Informed Clients to address this gap.

The principles are designed to:

- provide a clear, high-level framework to support client decision-making
- encourage proportionate oversight based on risk, complexity and building lifecycle responsibilities
- support stronger governance, accountability and culture
- help clients contribute to safer outcomes through the way they commission, procure and oversee building work.

Why we are consulting on the principles

We are now seeking views from all types of clients and other industry stakeholders on whether these principles are clear, useful and workable in practice.

This consultation will help us understand:

- whether the intent of the principles is communicated effectively
- how different client groups might apply them in real-world settings
- what barriers or challenges clients may face
- what further guidance, tools or case studies would help make the principles easier to apply.

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We strongly encourage respondents to read the full set of principles before answering the questions that follow.

How to submit responses

This consultation will last for six weeks from 24 March 2026 until 05 May 2026.

Responses must be received by 23:59 on 05 May 2026. You can respond in three ways:

1. Complete the online survey
2. Download the Word document version of this consultation and email it to bsrsecretariat@hse.gov.uk
3. Download the Word document version of this consultation and send it to:

Consultation on ICC's Principles for Informed Clients

Health and Safety Executive

Building 2.1 Redgrave Court

Merton Road

Bootle

Merseyside L20 7HS

If you require a more accessible format of this document, please send details to HSE.Online@hse.gov.uk and your request will be considered.

What happens next

Your feedback will help shape the principles before they are published. It will also inform the ICC and BSR's future work to strengthen the support available to clients.

As part of this consultation, we also invite you to indicate whether you would be willing to be contacted by the BSR and ICC for follow-up discussions on our work or to contribute examples or case studies of informed client behaviour in practice.

Your input is essential to ensure these principles – and any future guidance – are practical, proportionate and aligned with the realities of delivering safe buildings, and we thank you for taking the time to engage with us.

Confidentiality and GDPR

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HSE tries to make its consultation procedure as thorough and open as possible. A summary of responses to this consultation document will be made available on the consultation webpage after the close of the consultation period where it can be viewed.

Information provided in response to this consultation may be subject to publication or disclosure in accordance with the access to information regimes – these are primarily the [Freedom of Information Act 2000](#) (FOIA), the [General Data Protection Regulations](#) (GDPR) and the [Environmental Information Regulations 2004](#) (EIR). Statutory Codes of Practice under the FOIA and EIR also deal with confidentiality obligations, among other things.

If you would like us to treat any of the information you provide as confidential, please make this clear in your response. If we receive a request under FOIA or EIR for the information you have provided, we will take full account of your explanation, but we cannot guarantee that confidentiality can be maintained in all circumstances.

An automatic confidentiality disclaimer generated by your IT system will be disregarded for these purposes. Requests for confidentiality should be made explicit within the body of the response.

HSE will process all personal data in accordance with the GDPR. This means that personal data will not normally be disclosed to third parties and any such disclosures will only be made in accordance with the Regulations. See HSE's [Privacy Policy Statement](#).

FEEDBACK

Respondent Information
First name: Gill
Surname: Hancock
Email address: gill.hancock@apm.org.uk
Q. Which of the following best describes your primary role of perspective when responding to this consultation? (select one)
A. <ul style="list-style-type: none">• Public Sector Client (e.g. local authorities, NHS, government bodies) <input type="checkbox"/>• Commercial Client (e.g. private sector developers, investors, building owners) <input type="checkbox"/>• Residential Clients (e.g. housebuilders, landlords, residential developers) <input type="checkbox"/>• Lay or Community Client (e.g. homeowner, community groups, individuals) <input type="checkbox"/>• Designer / Consultant <input type="checkbox"/>• Contractor / Installer <input type="checkbox"/>• Regulator / Public body <input type="checkbox"/>• Insurer / Funder / Warranty provider <input type="checkbox"/>• Professional or Trade Body <input checked="" type="checkbox"/>• Other (please specify) <input type="checkbox"/>
Comment:
Q. Are you responding: (select one)
<ul style="list-style-type: none">• In a personal capacity <input type="checkbox"/>• On behalf of an organisation <input checked="" type="checkbox"/>• On behalf of multiple clients or members <input type="checkbox"/>
Q. Which are you responding primarily in relation to? (select one)
A. <ul style="list-style-type: none">• High-risk buildings <input type="checkbox"/>• Non-higher risk buildings <input type="checkbox"/>• Domestic residential work <input type="checkbox"/>• A mix of project types <input type="checkbox"/>• Not project-specific (policy/advisory perspective) <input checked="" type="checkbox"/>• Other (please specify) <input type="checkbox"/>
Q. How familiar are you with the Building Safety Act 2022 and associated dutyholder requirements? (select one)
A. <ul style="list-style-type: none">• Very familiar <input checked="" type="checkbox"/>

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<ul style="list-style-type: none"> • Some familiarity <input type="checkbox"/> • Limited familiarity <input type="checkbox"/> • Not familiar <input type="checkbox"/> 					
Q. Where did you hear about this consultation?					
Comment: BSR communications					
Document Feedback					
Application of the principles					
Q1. In practice, how would you expect these principles to influence practice in your role or organisation? (Select all that apply)					
A.					
<ul style="list-style-type: none"> • As a self-assessment or readiness check <input type="checkbox"/> • To inform procurement or appointments <input type="checkbox"/> • To challenge decisions or behaviours <input type="checkbox"/> • To support escalation or assurance <input type="checkbox"/> • To be reflected in documented processes or guidance <input type="checkbox"/> • To encourage more focus on quality, performance and long-term outcomes <input type="checkbox"/> • As a reference only, rather than driving change <input type="checkbox"/> • Other (please explain) <input checked="" type="checkbox"/> 					
Comment: Primarily as a reference, however there are some challenges in the text of the principles – please see additional comments					
Q2. Overall, do you think these principles would help improve client decision-making and outcomes if applied in practice?					
A.					
<ul style="list-style-type: none"> A. Yes, significantly <input type="checkbox"/> B. Yes, to some extent C. No <input type="checkbox"/> D. Unsure <input checked="" type="checkbox"/> 					
Please explain your answer: Principles and expectations are helpful, but in isolation will not make a significant change. The emphasis in this question is if they are applied in practice, and ensuring that they are, will be a challenge. There are some challenges in the text of the principles that would also need to be addressed – please see additional comments					
Please rank between (1) Very difficult or burdensome to apply and (5) Very proportionate and practical.					
Q3. To what extent do you consider the principles:					
A.					
	Very difficult or	(2)	Neutral (3)	(4)	

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	burdensome to apply (1)				Very proportionate and practical (5)
to be proportionate and practical to apply in your organisation or role?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please explain your answer: The principles are very high level generally but occasionally go into detail. There are some challenges in the text of the principles that would also need to be addressed – please see additional comments					
Please rank between (1) Completely unconfident and (5) Very confident.					
Q4. How confident would you feel:					
A.					
	Completely unconfident (1)	(2)	Neutral (3)	(4)	Very confident (5)
applying these principles in practice in your role or organisation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please explain your answer: The principles are very high level generally but occasionally go into detail. There are some challenges in the text of the principles that would also need to be addressed – please see additional comments					
Q5. Would additional supporting material/guidance help you or your organisation apply the principles?					
A.					
<ul style="list-style-type: none"> • Client group-specific guidance <input type="checkbox"/> • Case studies <input checked="" type="checkbox"/> • Other (please explain) <input checked="" type="checkbox"/> • Not needed <input type="checkbox"/> 					
Comment: The principles themselves need further work and clarification. Once this step has been completed then additional guidance might be helpful, particularly case studies. This also needs to be in the context of other work to improve competence and just publishing the principles will not bring about change on its own					
Q6. What are the biggest challenges you or your organisation would face in applying these principles?					

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Comment:					
Clarity and intent					
Q7. How clear do the principles make it that:					
A. Please rank between (1) Not clear to (5) Very clear.					
	Not clear (1)	(2)	Neutral (3)	(4)	Very clear (5)
they are intended as guidance, rather than creating new legal, audit or compliance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
clients are accountable as dutyholders, but are not expected to be technically competent themselves?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
proportionality should scale based on likelihood, consequence and complexity, rather than solely available resources or budget constraints?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
oversight and ongoing compliance should continue over the building lifecycle?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
organisational culture plays an important role in shaping safe and compliance outcomes, with a clear role for clients in leading this?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please explain your answers: Please see response to that additional comments question					
Structure and coherence					
Q8. How coherent do the principles feel as a single high-level framework (for example, avoiding duplication)?					

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A. Please rank between (1) Not coherent and (5) Very coherent				
Not at all coherent (1)	(2)	Neutral (3)	(4)	Very coherent (5)
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please explain your answer: The principles need to be read in conjunction with other guidance, so unfortunately do not provide a single framework				
Final thoughts				
Q9. Do you have any other comments or suggestions to improve the clarity, usefulness or impact of any of these principles?				
<p>Comment: The aim of the guidance is to define, support and promote competent and informed client behaviour, reflecting the duties set out in Part 2A of the Building Regulations 2010. It does achieve this through setting out the behaviours that are expected, however there are also a number of challenges. Comments are provided below that also support the answers that have been given.</p> <p>Title: Principles for Informed Clients. Whilst I can understand the meaning behind the title, it would be clearer to call it something along the lines of expectations for client behaviour, as currently it is unclear whether this applies to all clients.</p> <p>Context: This is useful in setting out the context of the expectations; however, it might be worth considering linking to where other guidance can be found or detailing the additional guidance ICC are expecting clients to have read and understood.</p> <p>Culture and the Client’s Role: Again, the context of this is helpful, but there are a few areas of concern within the text. The client can do the best possible job of recruiting professional people and set the conditions within which the work should be carried out, however, I am not sure it is possible for the client to <i>ensure</i> that every decision is undertaken with the highest regard for life safety. To meet this, there will need to be close working with other dutyholders and a reliance that the individuals/organisations that they have employed are acting professionally.</p> <p>Completely agree that clients have the greatest influence on whether competence, safety and integrity are enabled or undermined and they need to demonstrate relevant behaviours. I believe it would be better to change the sentence <i>Clients have no legal requirement to be competent</i> to <i>Clients have no legal requirement to be technically competent</i>, as this would help frame the following principles, which do go into details of behaviours and elements of competence.</p> <p>Clear Responsibility and Leadership: Agree with this principle, however it would also be helpful to include links to other dutyholders in this space as well. From a consistency point of view, I prefer the wording in this principle in relation to <i>full life of the building or project</i>, as opposed to the wording in the context section that puts the onus on the client to ensure decision-making <i>throughout the lifecycle of the building</i>.</p>				

Asking clients to make decisions that decisions *reinforce the wider public interest* is incredibly broad and goes beyond the limits of building safety, it would be better to tighten up the wording.

Competent and Informed Decision-Making: Fully support this principle and the emphasis on working with other dutyholders and the due diligence that clients need to undertake

Collaboration and Constructive Relationships: Fully support this principle

Balanced and Proportionate Oversight: Fully support this principle. However, this principle is at odds with the section around culture and the client's role as the expectation here is to *ensure* that *all* decisions are made with this highest regard for life safety. If the requirement/expectation is that professionals will be allowed to work autonomously then there needs to be an element of trust and not every decision can be ensured by the client.

Transparency and Effective Communication: Support the thinking behind this principle, however if clients are not legally required to be competent, or technically competent, then communicating decisions, risks, and constraints openly, promoting accountability and trust may well become challenging. Agree that they need to enable this to happen, but it might well be others who are doing the actual communication, and it is not just the client's responsibility to do this. It would be helpful to add in additional wording around how they work with others, including other dutyholders.

Ensuring Safety and Health: Support the thinking behind this principle, however this is at odds with other sections of the document. For example: *Safety and health must be managed in a proportionate way, balancing risk with other requirements related to design, construction and building regulations*, contradicts the wording used in the Culture and Clients role section that states that clients need to *ensure decision-making is undertaken with the highest regard for life safety*.

Completely support *Clients establish expectations that all work will comply with statutory duties, building regulations, and relevant safety standards*.

Currently unclear how clients would *ensure that design, materials, and methods are selected to eliminate foreseeable risks and protect both building users and those undertaking the work*, if there is no requirement for them to be competent or technically competent? Would this not sit with the Principal Designer?

Quality and Performance: Again, support this principle, but the way that it is written implies there is one client from construction through to maintenance which often is not the case. The last sentence is more a statement of fact – is it an expectation that continuous assurance of workmanship, testing, and validation takes place, in which case, this needs to be enabled by the client, not carried out by them.

Continuous Learning and Improvement: Fully support this principle, however this suggests that these principles are aimed at ‘professional clients’ who will be responsible and accountable for multiple projects. Is this the intention? If not please make it clear that this applies where clients are responsible for multiple projects.

It would also be helpful to add in some wording around expectations that clients may well work with project managers or other professionals to carry out their duties. Whilst responsibility can be delegated, accountability can't.

Q10. Would you be willing to be contacted for follow-up discussions, future consultation activity, or to contribute case studies related to informed client behaviour?

A. Yes No