

# How accountable is 'Accountable' within the Golden Thread?



In her post-Grenfell report, 'Building a Safer Future', Dame Judith Hackett recommended the introduction of a 'golden thread' and the principle of Accountable Persons, to support dutyholders in designing, constructing and managing their buildings as holistic systems, rather than just buildings. The principles behind these recommendations have been incorporated in the Building Safety Act, which was granted Royal Assent on 28 April 2022 – it's expected that the bulk of the new obligations will be implemented between April and October 2023. The Fire Safety (England) Regulations 2022 also come into force on 23 January 2023 which entail new duties.

Everyone welcomes the intention of ensuring safer buildings for all, but it is entirely natural to feel anxious or unsure about fulfilling these new duties, so we were not surprised to see so many people signing up for our autumn webinar 'How accountable is 'Accountable' within the Golden Thread'. Our guest speakers, Anthony Taylor from Resolve Group, Stephanie Lloyd-Foxe from Magna Housing, and Sophie Westlake from Norseal, along with our in-house expert, Neil Smith, shared their thoughts on the new regime. This whitepaper sums up their contributions and looks at how responsibility can be managed to ensure that critical safety standards are upheld without placing unreasonable pressure on individuals.

## Webinar panel



**Neil Smith**  
Technical & Compliance  
Associate Director, Rutland



**Anthony Taylor**  
Resolve Risk Limited



**Sophie Westlake**  
Norseal



**Stephanie Lloyd-Foxe**  
Magna Housing

## What is the golden thread?



The golden thread is both:

- The information about a building that allows someone to understand a building and keep it safe, and
- The information management to ensure the information is accurate, easily understandable, can be accessed by those who need it and is up to date.

To watch the full webinar, visit:  
[rutlanduk.co.uk/accountable-golden-thread](https://rutlanduk.co.uk/accountable-golden-thread)



# Who is accountable and what for?

Part 4 of the Building Safety Act identifies new dutyholders for residential high-rise buildings over 18m or seven storeys high.

These dutyholders will be known as 'accountable persons' (APs) and this will be the organisation or person who owns or has responsibility for the building.

**The AP will have a duty to take all reasonable steps to:**

- prevent a building safety risk happening, with building safety risk defined as 'spread of fire and/or structural failure'
- reduce the seriousness of an incident if one happens

If a building has more than one AP, the AP responsible for the structure and exterior of the building will be the principal accountable person (PAP). When buildings have a single AP, that entity or person is the PAP.

**As well as their duties as an AP, PAPs must:**

- register existing buildings with the Building Safety Regulator (BSR) – they can do this between April 2023 and October 2023
- register all new buildings before occupation

All occupied buildings must be registered by October 2023; it is an offence if a building is occupied but not registered after this date.

To avoid confusion, it is worth noting that The Fire Safety Act also talks about the 'responsible person'. The accountable person and the responsible person can be different roles, or the duties can be performed by the same person.



## Who will enforce the Act?

The Building Safety Act names HSE as the new Building Safety Regulator (BSR). It will have three main functions:

1. Overseeing the safety and standards of all buildings
2. Helping and encouraging the built environment industry and building control professionals to improve their competence
3. Leading implementation of the new regulatory framework for high-rise buildings

To raise the standards of competence across the built environment sector and improve the safety of residents and the workforce, BSI has developed three new Publicly Available Specifications (PAS). These will make it easier for different parts of the construction industry to work together by establishing agreed core principles and requirements on competence, providing a shared understanding of roles along the delivery supply chain.

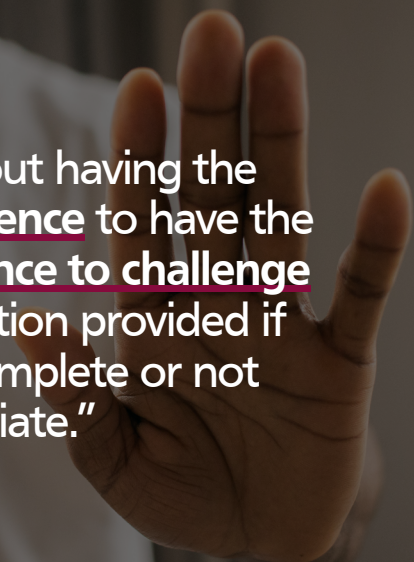
# Industry Competence Committee (ICC)

Increasing competence across the industry is at the heart of the new regime, and the Industry Competence Committee will take a strategic overview of competence, delivering a leadership role and becoming the authoritative voice of competence in the industry:

- The committee will visibly drive competence forward to support immediate changes in culture and uptake of training for key roles
- Implement a “path to culture change” through a longer-term strategy to run over the next two, five or even 10 years
- Monitor the uptake of competence, and the creation of new training opportunities



## Industry Competence Committee (ICC)



“It’s about having the competence to have the confidence to challenge information provided if it is incomplete or not appropriate.”

## Behaviour and integrity

The aim of these new standards is to help the industry meet the challenges set by the Building Safety Act, by focusing on raising the quality of work, the behaviour and the culture of individuals working in the built environment.

Throughout all standards, competence is very much linked to behaviour and integrity, as opposed to being simply a box-ticking exercise. The over-arching question must be: are the people collectively delivering building safety, competent to do so? Anthony Taylor commented: “It’s about having the competence, to have the confidence to challenge information provided if it is incomplete or not appropriate.” And he echoed what Dame Judith Hackett said in her report, that we must look at buildings as systems.

The new standards establish frameworks for competence for each discipline, and each discipline will report into their own trade body.

### PAS 8671:2022

Framework for competence of individual Principal Designers

Specifies competence thresholds that individuals are expected to meet when delivering or managing the dutyholder functions of the Principal Designer role, and additional competencies for working on higher-risk buildings (HRBs).

### PAS 8672:2022

Framework for competence of individual Principal Contractors

Specifies competence requirements for the role of Principal Contractor. It also describes specific competencies common to all Principal Contractors and those which are additional for those undertaking the role on HRBs.

### PAS 8673:2022

Competence requirements for the management of safety in residential buildings

Specifies competence requirements for the management of safety in residential buildings and other developments incorporating residential accommodation. It also gives guidance on detailed competencies and the assessment of competence.

# How to train and resource accountability

None of this will be easy of course. The social housing industry, for instance, is under a great deal of pressure already.

Stephanie Lloyd-Foxe from Magna Housing stated that these pressures include reducing carbon footprints to hit net zero targets, ongoing consultations/further legislation dealing with adverse publicity and disrepair claims, the impact of double-digit inflation and the introduction of rent caps and freezes which has knocked millions of pounds off future budgets.



**1 in 3**

UK construction workers will have retired by 2040

**Just 7%**

Young people considering a career in construction

**↓ 20%**

Apprenticeship take-up during the pandemic

**30,000**

Recruits needed for every 10,000 new homes built

## So, practically, how will the industry meet these obligations?

According to Stephanie Lloyd-Foxe, good quality data and promoting the right behaviours is key. At the moment, for many housing associations, that data is elusive, even for something as simple as the height of different buildings – this may be tucked away on a CD somewhere on a shelf. Gathering and keeping this data consistently is a huge task, but perhaps the many people who have contact with residents – the gas engineer, the housing manager, the caretaker, maintenance staff – can they be enlisted to help with this?

## Driving the right behaviours

The new legislation is about instilling accountability in the supply chain – if the skills are not there, people must be trained.

But again, this is about cultural change as well – safety, not compliance. Does this system work; does it keep people safe? Stephanie pointed out that it is far easier to teach skills than it is behaviours, and suggested starting with behaviours, upskilling those displaying the right behaviours. This means holding suppliers and contractors to account as well; building compartmentation surveys

Recruitment is also a significant challenge with skills and competency gaps – by 2040, one third of UK construction workers will have retired and plans to fill this gap are not currently on track.

There was a 20% drop in apprenticeship take-up during the pandemic and only 7% of 16–18-year-olds are considering a career in construction and the built environment. This will leave a shortfall in the industry – for every 10,000 new homes built, 30,000 additional recruits are required within the industry, and we all know that there is a serious shortage of social housing out there.

Naturally, this sort of information-gathering requires people resource – to free up valuable personnel, technology and automation can be used for the more repetitive, mundane tasks, for example self-testing lights, remote monitoring, smart door closers and tagging doors with QR codes – a QR code can provide every bit of information required, from door manufacturer to installation, to maintenance.

will be key to check that everyone is meeting their obligations, and procurement specifications will establish roles and responsibilities very specifically so that there can be no doubt who is accountable for what.

Tools and resources to help organisations effect such change can be found at Building Safety of the Future, which was established to support the construction industry in creating a positive culture and behaviour change in the safety of the built environment.



## Key takeaways on social housing

- Seek out and employ advice early from advisors, such as [buildingsafetyalliance.org.uk/](http://buildingsafetyalliance.org.uk/) and competent professionals in fire door safety
- Budget for and fund your Golden Thread and find new networking partners within your sector who have ideas that are working on funding
- Make sure fire doors and essential hardware are compatible and compliant third-party certificated
- Competence will be checked...and checked in detail subsequent to any incident

## Golden thread of fire doors

At a more granular level, Sophie Westlake from Norseal spoke to us from a supplier's point of view and emphasised the importance of awareness of product lifetimes and proper maintenance (with records), to uphold the compliance achieved at original sign-off. When a fire door or doorset is manufactured, it is made to fire test standards. Ensuring it maintains these standards throughout its life span can be more challenging, but is vital, nonetheless.

## Three golden rules of fire doors

- ✓ A fire door must be **correctly manufactured**
- ✓ A fire door must be **correctly installed**
- ✓ A fire door must be **correctly maintained**

The golden thread of information must be tracked and recorded, and door tracking systems present an ideal way of doing this. A door tracking system is a bit like a VIN number on a car – it remains with the door throughout its life span, giving each responsible person the information they need to keep that door operating as an important life-saving safety device.

## Conclusion

Having a golden thread will mean that those in accountable positions will have a quicker, more reliable way of accessing accurate information – without this information, it is very difficult to manage buildings safely. What was clear from listening to the speakers in this webinar is that there is an awful lot of work going on behind the scenes to empower organisations and individuals to meet their obligations in the right way. The new regime is about safety, not compliance, and if that involves questioning or challenging what has been provided, so be it – that is part of being accountable. Undoubtedly, there is a lot of change ahead, cultural and otherwise, as the new legislation becomes embedded within the industry, but the end result will be safer buildings for all. You can listen to the entire webinar here, including an interesting question and answer session at the end. Our next webinar, in January 2023, will focus on legislation updates relating to building safety, so sign up to our mailing list or follow us on LinkedIn if you would like to be kept informed about future events.