



The Guild of Architectural Ironmongers Response: Draft Building Safety Bill

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This response to the draft Building Safety Bill is from the [Guild of Architectural Ironmongers](#) (GAI). It is an endorsement of the response from Construction Products Association which is reproduced below. The Construction Products Association (CPA) is an umbrella Trade Association comprising of 33 product trade associations, 22 manufacturing companies and 35 Affiliates and Associate members representing the UK's manufacturing and distributors of construction products. GAI are a member of this Trade Association.

GAI are proud to represent the ironmongery industry on CSG Working Group 12 – Competence in Construction Products, with Technical Manager Douglas Masterson as Deputy Chair of this Group.

To provide further clarification the term “architectural ironmongery” can be defined as the manufacture and distribution of items made from iron, steel, aluminium, brass or other metals, as well as plastics, for use with doors, door assemblies, doorsets and windows in all types of buildings. Such items, sometimes also described as architectural or building hardware, include door handles, locks, door closers, hinges, seals, window fittings, handrails and balustrading. Architectural ironmongery is subject to more than 60 British and European standards.

The architectural ironmonger plays a vital role, working with architects, interior designers, contractors and others, to schedule and specify the hardware for every door and window in a building and to produce a full fixing schedule of hardware items which are fully compliant with all the latest regulations and standards.

Architectural ironmongery is also an essential and intrinsic part of a fire door. Without its correct specification, supply, installation, inspection and maintenance a fire door will not be able to function correctly. It is also critical to a building's security and accessibility.

On a daily basis, fire doors will also be used for their security, privacy, acoustic or thermal performances. This use and potential misuse gives many opportunities for their fire performance to be compromised. It is a sad fact that many fire doors do not work correctly due to poorly specified, fitted or maintained ironmongery, in addition to the constant misuse and abuse of what is a critical life safety feature. Fire doors play a critical role in the passive fire protection of a building.

The Guild of Architectural Ironmongers

The Guild of Architectural Ironmongers (GAI) is the only trade body in the UK that represents the interests of the whole architectural ironmongery industry - architectural ironmongers, wholesalers, hardware manufacturers and door manufacturers. Its reputation is built on three key areas: education, technical support and its community activities. Its qualifications, education and CPD programmes are widely respected in the UK and overseas, including the GCC and Hong Kong. Its technical information service is the only specialist service of its kind, providing members with comprehensive advice on issues relating to the legislation, regulations and standards governing the use of architectural ironmongery and related hardware. Its awards recognise and reward personal and business excellence. There is a range of company and individual membership options for those working in and around the architectural ironmongery industry depending on their role, their qualifications and their experience.

The GAI has been providing a unique education, qualification and CPD programme for people who work in and around the architectural ironmongery industry since 1961.

Most aspects of the GAI education programme are available and recognised worldwide. There are more than 2,600 GAI Diploma holders to date in 25 countries. The GAI's education syllabus is the only

recognised programme in the world that leads to a qualification in architectural ironmongery to British and European standards.

The GAI is run by the industry for the industry and currently has over 300 member companies worldwide.

Construction Products Association Response to Draft Building Safety Bill

Who we are

The Construction Products Association (CPA) is an umbrella Trade Association comprising of 33 product trade associations, 22 manufacturing companies and 35 Affiliates and Associate members representing the UK's manufacturing and distributors of construction products. The sector directly provides jobs for 373,000 people across 24,000 working companies which collectively have an annual turnover in excess of £61 billion. CPA acts to facilitate a two way dialogue between industry and all levels of government within the UK and the EYU to pursue industries interests in whatever area current activity dictates.

Comments

High Level Aspects

- The main focus has been about fire and structure which CPA believes to be the initial focus. It is acknowledged that the structure allows the focus to be widened over time. Having a safe building cannot be limited to just fire and structure and must be part of the ambition going forward.
- The draft does not resolve uncertainty with the Principle Contractor and the Principle Designer roles under the CDM and how these will merge with the new requirements
- With regards to product certification around the CPR this raise some concerns
 - This only impacts minimal parts of the product sector
 - There will be a National Regulator for construction products, a Construction Products Standards Committee and a list of 'safety critical' products
 - Performance and outcomes are created rarely by single products but actually by assemblies of products, this does not seem to be recognised
 - Greater clarity is need by industry on all these areas
- Any statutory power over architects and designers within the bill we assume will be in secondary legislation
 - Will the client have to prove they have employed a competent Principle Designer?
- Gateway 1 - Planning:

- We believe that the additional time frame for Gateway 1 would be carried out under the Building Safety Regulator in consultation with the current planning office, however, clarity is required on this point
- Which buildings are in scope and which are not seems fluid. It appears that the bill has been drafted to enable future expansion on this point and is welcomed.
- The guidance seems to indicate a submission at Gateway 1 would be made before a duty holder is appointed. Bearing in mind the likely technical nature of any required submission this is impractical as it is the principle designer that needs to make or at least oversee the submission.
- Gateway 2 - The complex nature of the technical verification means time will be needed to ensure this is carried out adequately. Controls over verification of the detail and ensuring the design is carried forward to construction is paramount.
- Allowing submission of detail in a phased way as construction to get underway will create a minefield of problems and allow solutions to be built straying away from the agreed compliant design.
- Gateway 3 - Handover:
 - The assumption is that a building will be signed off at handover which will present industry with some issues which they are not used to responding to this level of rigour
- Do products have to be named or just products meeting the performance and third party certification
- How does all this fit into the digital agenda is uncertain - clarity on this point is required
 - If government set clear requirements on this point, it would accelerate industry's response to digitalisation which is to be welcomed
- The draft bill has responded to the Hackitt Review but not to the recommendations from Sir Martin Moore-Bick's report
 - This seems strange
- There is nothing covering the quality of installation which has a major effect on performance of a building
- There is no requirement for the Regulator to share his learnings with anyone
- On the review of a safety case regarding retrospective regulations and the application of new regulations what power does the Regulator have?
- It is not clear if the ability of the Regulator will have any meaningful impact on a Safety Case
- While the Regulator has the ability to apply 'stop notices' but it is not clear how this can be undertaken for current buildings

Specific Issues

The following issues have been identified as areas requiring further clarification in the draft Building Safety Bill.

- Clarity of definitions is required for:
 - Product, system, Safety critical (which I believe has been set), products which are not safety critical
- Product listing
 - Some products that get a high risk listing when considered by themselves but those same products, when part of a system, would not be considered a risk

- There is concern as to how specifiers and insurers will deal with such a list. There is already a black list of products on the back of Approved Document B where those products meet all the requirements of the Building Regulations when used in an appropriate system
- There was great concern from many quarters that the bill is angled towards individual products and that systems are ignored
 - Buildings are composed of numerous systems
 - Products are supported in isolation but a system approach is required
 - Does the term 'system' also cover 'kits' and 'sets' as well?
 - Will a kit have to originate from a single manufacturer?
 - Many kits are composed of a group of products from various suppliers but are not tested as a system
 - Not all products will perform the same when used in a system or adjacent to another product
 - Products are supported in isolation
- UK Designated Standards - We are informed that only harmonised European standards (hENs) which have been cited in the OJEU will become British Designated Standards.
 - Currently there are revised hENs which have not been cited in the OJEU but have been published as BS ENs.
 - We presume this will be clarified when the UK list of Designated Standards is published
- Much reference was made to harmonised European standards but European Technical Assessments (ETAs) were ignored
 - An ETA is a voluntary approach to the provision by a manufacturer of a Declaration of Performance and CE marking
 - Many passive fire protection products are covered by ETAs but not harmonised European standards - it is imperative that this is clarified
 - This is a large omission which requires rectifying
- The issue of competent workmanship on site has not been addressed
 - A manufacturer's competency in producing products using standards can be completely undone by inappropriate onsite workmanship - installers need training in the use of new products
- The issue of inappropriate product selection and application has not been addressed
 - A manufacturer's competency in producing products using standards can be completely undone by inappropriate onsite workmanship
- Are we right to assume that safety critical products will be those not covered by harmonised European standards?
- Industry needs a simple explanation e.g.
 - If a product is covered by a harmonised standard then this happens
 - If a product is not covered by a recognised standard then something else ensues
- The compliance route requires greater clarification
- Industry has very little faith in Trading Standards being effective in enforcement
 - Historical evidence from the years when they were supposed to be enforcing the CPD and the CPR
- Need to look closely at the CDM 2007 Regulation and the role of the Designer
 - Manufacturers of construction products offer advice and details to help with onsite situations therefore, ownership/liability is placed on the manufacturer.