



The Guild of Architectural Ironmongers Response: Raising the Bar Interim Report – Improving Competence – Building a Safer Future

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A. Overview

This response to “Raising the Bar Interim Report – Improving Competence – Building a Safer Future” is the opinion of the architectural ironmongery industry and is based on consultation with the membership of the [Guild of Architectural Ironmongers](#) (GAI) through the GAI Executive Committee, and GAI Technical Committee.

GAI are proud to represent this industry on Working Group 12 – Products and is listed as contributors in Annex A of the interim report.

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.

B. Introduction

Objectives: GAI is in agreement with both recommendations of the Competence Steering Group (CSG) laid out in point 27 in respect of competence and competences within the construction industry:

- To lay firm foundations for a more coherent and consistent approach to assessing and ensuring competence across the critical disciplines.
- Accompanied with the right legislation they pave the way for a culture change across the whole building industry, so that everyone recognises their responsibility as part of a wider system for delivering safe buildings.

Need to change: GAI also agree with point 28 that industry organisations need to raise the bar through a more rigorous approach including training, assessment, reassessment and third-party accreditation.

To emphasise this, the GAI's education training portfolio has been continually developed over 50 years and is the only recognised programme in the world that leads to a qualification in architectural ironmongery to British and European standards. This is in the form of its highly respected [DipGAI](#) Diploma course. The GAI also provides timely technical updates to its membership on relevant product standards, codes of practice, building regulations and fire related safety.

In respect of third-party certification GAI feel that this is an area where greater importance must be given. The Independent Review of the Building Regulations and Fire Safety Final Report states "Manufacturers of construction products used in buildings where performance standards apply should ensure that products are retested at regular periods (at least every three years). They should also ensure that this testing is verified by an independent third-party certification body." The GAI has constantly pressed for mandatory third-party testing of products which are related to fire safety through schemes such as [Certifire](#). Whilst this has not been recommended as being mandatory in the Interim Report, a stronger push towards third-party certification would be greatly welcomed by the GAI.

The dual approach of a bottom up, 'raising the bar' process for the general workforce and a top down 'sharp focus' on the three key roles of Principal Designer, Principal Contractor and Building Safety Manager which is mentioned in point 35 is also to be welcomed. Architectural Ironmongery product is most impacted by the Designer at specification stage and also by the Contractor at procurement stage and any process of assisting with raising competences on these critical touchpoints to our industry is to be welcomed. We are also of the view that competence must be fed through to the general workforce, this particularly refers to installers of product on site. Correct Installation of ironmongery and fire doors is essential to their correct function and anything which raises competence with this area is to be greatly welcomed. Too often do we see first class quality doors with first class quality ironmongery being fitted by inexperienced and low quality companies and operatives.

Time and investment: There would be concern that as per point 30 that time and investment would be required to achieve the outcomes detailed in the recommendations relating to increased competency, but feel that the necessary investment is something which must be made, as per point 38. However, in the longer term, there will be significant cost benefits from having a competent workforce and more robust safety management processes which will increase efficiency and result in safer and higher quality buildings, thus far outweighing the initial costs.

Margins and payment practices: It is a sad but accurate reflection made in point 47 from the Farmer Review of the UK Construction Labour Model that “Low margins and poor payment practices, can lead to a culture where high quality outcomes are rejected in favour of outcomes which drive the design and construction of a building towards lowest cost of delivery.” The architectural ironmongery industry is beset with the challenges which come from under-pricing of material and substitution of correctly specified product. Architects will take advice from Architectural Ironmongers at scheduling time, but specifications are often broken in the name of economy by a contractor at the procurement stage. This is seen as part of a “value-engineering” process. This practice of reducing the level of specifications is, unfortunately, endemic throughout the whole construction process so any means of discouraging this process is to be broadly welcomed. We also often find that contractors who are bidding for a project are demanding reduced levels of specification from our members to assist them in keeping their bids as low as possible.

Continuing Professional Development Point 57 states that “Across all sectors, there has been clear commitment to a CPD framework.” GAI is hugely supportive of Continuing Professional Development and, in addition to its previously mentioned Diploma Course DipGAI, has the [RegAI](#) Continuing Professional Development scheme which demonstrates ongoing commitment to CPD.

Ad hoc designers: The competences of “Ad hoc designers” as mentioned in points 69 to 71 is an area of great interest to the GAI. The statement as follows rings true to our industry, particularly in the specification and supply of architectural ironmongery to doorsets and door assemblies: “Many products are brought together or modified to suit the application required. All of these activities require design work and often this occurs completely under the radar and is unseen by the majority of the construction team.”

Point 70 states that the challenge is to identify those involved in this sector. Architectural Ironmongery and doors can form part of the carpentry and joinery packages, although access control and door automation which is also covered under our membership can be included in the mechanical and electrical services (M&E). The correct specification, supply and installation of these vital products will indeed have “significant value over the safety of the completed asset” (point 71). Supply of incorrect ironmongery and associated product, by contrast can have a hugely detrimental effect on any construction project.

Occupants and building users must also be briefed to understand their building’s fire and evacuation procedures as mentioned in point 74. The ability of a resident to replace a fire door or amend it in some way (such as removing or adjusting a door closing device) can have huge implications on life safety and occupants must be aware of the dangers involved.

Regulatory groups: The competence of regulators as discussed in point 77 is also of huge importance to our industry. Trading Standards would be a logical mechanism of complaint for those in breach of Construction Products Regulation (CPR) which is of particular import to the GAI as many of the products specified and supplied by GAI members fall under the scope of harmonised standards when placed on the market for usage on fire and/or escape doors. It is important that this mechanism has sufficient levels of competency (and efficacy) that when complaints are issued that they be dealt with in the most appropriate and enlightened manner.

Project principles: Point 79 provides an excellent framework of principles for any well organised construction project. GAI is most particularly concerned with ensuring “design intent is preserved” which should include compliant specification of product. Also, that “change control” as referred to is carefully handled, again with particular reference to the potential substitution of correctly specified product for inferior equivalents all in the name of cost savings – which can end up being false economy in the long run as previously stated.

Digital techniques of ensuring information is brought together in construction as outlined in points 80 to 82 is of great interest to GAI. The GAI have been highly vocal in its support of Building Information Modelling (BIM) and have provided 35 BIM product data templates to its members so they can provide Product Data Sheets to deliver their product information in a structured manner to architects and contractors. It is a source of frustration to the GAI that despite a large amount of effort in providing templates to its membership that it feels that there is a lack of demand from the construction industry for structured information in a digital format. It is hoped that an increased demand of digital techniques such as BIM through the Hackitt Review and the Raising the Bar report will assist in this. We agree that “ Digital techniques are integral to ensuring that competence is supported, verified and recorded. “

Develop learning materials for basic fire safety: GAI also agrees that the development of learning materials for basic fire safety is critical and would be welcomed in the ironmongery and fire door industry as discussed in point 85. Maintaining compartmentation is indeed critical and fire doors have a huge role to play in passive fire protection.

Fire Door Inspection: Inspection is mentioned 24 times in the report but sadly it is not connected with the inspection of fire doors. The GAI has previously proposed that the inspection and maintenance of fire doors should be mandatory under Building Regulations as is the case in Australia and USA during our response to the Hackitt Report. The final report sadly did not go as far as this. It did, however state that “for all residents and for landlords of properties in HRRBs, their obligations extend to ensuring that fire compartmentation from the inside of a flat, including the front doors, is maintained to a suitable standard.” This statement was welcomed, although not to the full extent we would have liked.

Inspection of ironmongery: Sir Martin Moore-Bick in phase 1 of the Grenfell Tower Report of the Public Inquiry recommends in Chapter 33 that that “the owner and manager of every residential building containing separate dwellings (whether or not they are high-rise buildings) be required by law to carry out checks at not less than three-monthly intervals to ensure that all fire doors are fitted with effective self-closing devices in working order.” The GAI would be in complete agreement with having this enshrined in law.

C. Recommendations on Competence from Building A Safer Future

GAI will not provide specific detailed comment on the Hackitt recommendations on competence from Building a Safer Future, having already done so previously but would reiterate that the GAI is indeed in agreement with the principles outlined.

D. Principles of Competence

In relation to section D – Principles of Competence, the GAI is in agreement with the following goals and definitions in respect of competence and competences:

Goals:

96. To ensure that all those individuals engaged at every stage of the life cycle of HRRBs and responsible for carrying out work that impacts safety, have the proven competence to do so.

97. It is recommended that the Principles of Competence document is adopted for use well beyond the CSG and its working groups, and that it will hopefully be embraced as the datum for common competency by all those working on HRRBs - ultimately to make them safer places to live and work in.

Definitions:

‘Competence’ is the combination of skills and knowledge that enables a person to make informed decisions and carry out a defined task;

‘Competences’ are the particular skills and knowledge of an individual, that may be applied personally or collectively as part of a team

Route forward for Principle 1:

The Route forward states the following:

“Each professional, trade or skills body will define the activities that make their body unique, and over which they have primacy.

Each body will define the competences that are unique to that activity – and over which only other members of that body can assess adequacy.”

It should be noted that the GAI have commenced an exercise looking at what competences there are which are unique to the differing aspects of being an architectural ironmonger, and to develop this as a framework industry document with a view to raising levels of competence within the ironmongery industry as a whole.

GAI also takes very seriously its commitment to assessment of its members through varying levels of education from Foundation in Hardware to DipGAI right through to assessed Continuing Professional Development (RegAI) as previously mentioned in this response.

Principles 2 to 4:

GAI also take ethics, honesty and integrity, accuracy and rigour, and responsibility for direction, conduct and communication very seriously indeed. Each member company must sign up to [GAI Code of Professional Conduct](#) when entering membership of our Trade Association. If the GAI, having duly and properly investigated an alleged breach of the code by a member and finds that member company to be in breach of the code, it shall take such disciplinary action as it shall deem appropriate.

E. Summary of Recommendations

There are a number of Working Groups which have been set up which do not impinge on the works of architectural ironmongers or allied trades therefore we will only be making comment on those sectors which we feel to be relevant.

As stated previously the Principles of Competence outlined in Section D above are deemed to be of value and of note and are closely aligned to the views of GAI members.

Principles of Competence: GAI agree that The Principles of Competence in R1 should be adopted for universal use to be embraced as the datum for common competence by all those working on HRRBs, although the GAI would like to see these principles extend beyond HRRBs and in to the Construction Industry generally.

Competence Frameworks: GAI are also in agreement that the competence frameworks which have been proposed by the various working groups are to be adopted (R2)

Continuing Professional Development is, as stated of huge importance to GAI through the Registered Architectural Ironmonger (RegAI) scheme. (R14-R17)

Additional Competence Requirements: R23 states the following: The three key roles that have primary responsibility for building and life safety at each stage of a building's life cycle (Principal Designer, Principal Contractor and Building Safety Manager) require competences in addition to any discipline related competences. These additional competences relate to their overarching role to ensure that the design intent of the building is maintained and that workers employed and used in design, construction, refurbishment, maintenance and operation are suitably competent. GAI are in total agreement with this statement and that each role as defined is of great importance. The interface of each role with life safety critical product such as ironmongery and doors is a matter of huge relevance when it comes to fire safety.

Installer Competence Framework R29 to 33 looks in great detail at installation of material. It is a sad fact that the quality of installation of fire doors and ironmongery is often sadly lacking. Any recommendations which can assist in increasing competences across this area in particular is to be hugely welcomed by GAI.

Safety Case and Fire and Emergency File: R55 for the safety case and fire and emergency file details that this be mandatory for all residential buildings (except detached and semi-detached, owner occupied and subject to the building category falling into scope of the new regime). Information on fire doors and essential ironmongery should be provided within this document to ensure that residents are aware of the importance of these products.

Independent Construction Assessor: R57 to R60 from WG9 on the recommendation for the creation of a new role of Independent Construction Assessor is to be welcomed by the GAI as this will greatly assist with increasing the quality of installation across the industry. This role will be someone who assures that the on and off-site works comply with the design and all necessary building standards and regulations. It appears that this will be a similar role to that occupied by the Clerk of Works. The reintroduction of the Clerk of Works and was one of the recommendations of GAI members in their response to the Hackitt Review. This stated : "The role of inspecting the workmanship, quality and safety of work on site and then reporting findings to the client has largely been lost and this results in many errors in installation which would have been caught on site now being passed" this new role will be of great value to the construction industry.

Procurement: The introduction of a Procurement Group (R63 and R64) is seen as a step in the right direction – this area is one where specified product is often sacrificed and anything to increase competences in this area in respect of ensuring correctly specified and fit for purpose product is procured is seen as of huge importance in our industry.

F. Working Group 12 – Products

GAI are a proud member of Working Group 12 Products (R65-R67) and were therefore greatly involved in the discussions and recommendations of this Group including the development of the Competent SAKE matrix.

Culture Change: Point 656 is of note: “WG12 work covers all construction materials, products (including product interactions /systems) that are a fixed part of a completed building. Products that directly interact with fire or that are specific to HRRBs can be difficult to separate at a market level. WG12 has recognised that culture change across the competence of all sectors is the safest way to achieve the required change.” This requirement for culture change in respect of products is heartily agreed with by the GAI.

SAKE Matrix: GAI recognise the value in providing touch points for industry in relation to required competences in respect of construction products. Defining the competences of each actor/key role in the construction process from design stage to completion and beyond is not an easy task and further detail will be required in each industry sector. The creation of Relevant Authorities to achieve consensus on core competences in each industry is seen by GAI as an excellent step in the right direction. It will then be down to each product industry to look at its own competences required and look to develop a matrix of its own.

The matrix is an excellent high-level view of competence and GAI agree that “The new regulatory framework and sanctions must recognise the WG12 competence framework as the way industry should behave when addressing products and their interactions”.

Product Competence: We are also in agreement that “Product competence is complex. Whilst courses and qualifications may set good foundations for understanding, product competence cannot solely be identified through these alone.” And also, that “combinations of qualifications, training and applicable experience will be required”

Understanding product interactions: Point 663 states the following which is an issue which GAI members see all too often in relation to ironmongery, fire doors and escape doors:

“Product performance is determined in large part by its interaction as part of a wider system. Understanding this becomes particularly pertinent when choosing, substituting and installing products. In the worst case, inappropriate combinations may have dangerous ramifications.”

The ‘Marketing Integrity Group’ (MIG) Point 666 is also worth highlighting on behalf of GAI: Whilst competence of those using products needs to be addressed, it is equally clear information provided by manufacturers could in many cases be improved. Marketing and other forms of information should be clear, rigorous and unambiguous.

MIG (point 675) will therefore be of huge value to the construction products sector as “The MIG is working to establish a pan-industry standard for all marketing and technical information. This will provide a new level of confidence that marketing is not overpromising or misleading, either directly or by omission, and that technical information is provided using industry norms and/or clear descriptions.”

It is often easy for information to be presented in a way which can be misleading, particularly in areas where technical information such as standards are required. Anything which helps lay down guidelines and recommendations will be of great value in this area.

Barriers to delivery: GAI recognises that as in point 682 that “Proportionate but appropriately severe sanctions must be in place to ensure industry compliance, including a resourced policing mechanism.” Unless this is in place, things are unlikely to improve.

Point 683: Again, it is agreed that industry buy in is critical and that without this, things will not move forward.

Pont 684 states that “This programme will take around five years to roll-out and ten years for full uptake.” Any detailed programme to and increase the competences required around product will by nature take time but will be of huge importance, the concern being that things do not improve quickly enough in the interim period.

GAI also agree that “It is vital that Government also actively supports the entire process to ensure industry wide implementation”.

G. Conclusions

To conclude: GAI are greatly encouraged with the work which has gone on so far when looking at increased levels of competence. We are conscious, however that this is only the beginning – identifying the areas to look at is one thing but being able to implement it is completely another.

This will take a huge amount of time, commitment, cost and the pro-active intervention of Government, all of which will be necessary. Unfortunately when new standards and regulations are developed they are often ignored by industry when they are seen as voluntary, it will therefore be through the backing of Government and the introduction of mandatory standards which are then enforced that we will see an increase in levels of competence in industry.

It is a huge concern that if this does not occur that market forces will continue to drive prices and quality down and that the lessons which are being learnt from the recent tragedies such as Grenfell are not acted upon.

Action must be taken to ensure that events such as these never happen again.

END

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