SELECT is the Trade Association and statutory employers’ organisation for the Electrical Contracting Industry in Scotland. We represent over 1200 Member Companies who vary in size from sole-traders to multi-national organisations. Member companies account for around 90% of all electrical installation work carried out in Scotland, have a collective turnover of more than £1 billion and provide employment for 15,000+ people. SELECT is a Scottish Government appointed Scheme Provider for Certification of Construction (Electrical Installations to BS 7671).

Our response to the call for evidence on whether the building regulations are operating effectively is as follows:

1. **Should verification of building standards be extended to organisations other than local authorities?**

   It would be preferable for verification of building standards to remain with local authorities.

   However, there remain concerns with consistency of understanding and application of building standards guidance, processes and procedures across current verifiers (as evidenced most recently in the series of training events we participated in with all of the Local Authority Building Standards Scotland (LABSS) consortia groups).

   Service levels to all stakeholders would be improved with greater consistency and application of the agreed procedural guidance and this ought to be achievable across the public sector and the current Certification Scheme providers. All parties (Verifiers and Certification Scheme Providers) must be more accountable for performance and measures to ensure this is the case need to be implemented to improve consistency to an acceptable level. If this is not done, then the case for extending verification to external organisations will be harder to resist.

2. **Should procedural regulations specify a minimum requirement for the inspection of ongoing building works, to ensure compliance with building standards?**
Ongoing inspection is unnecessary for disciplines covered by a Certification of Construction or Design Scheme, where Approved Bodies take full responsibility for the compliance of works with technical and safety standards. Regrettably, Certification Schemes are not mandatory and as their application by all parties is variable, the full benefits as outlined in published Building Standards Division (BSD) reports are not realised.

There may be a case for specifying a minimum requirement for inspection for building works not covered by a Certification of Construction or Design Scheme and/or for certain types or value of works e.g. public buildings? Indeed, there may even be a case for extending Certification Schemes to other specific construction related disciplines.

3. Are the current building warrant and associated fees set at the correct level?

No.

The recent Consultation on Building Warrant Fees proposed a range of fee increases to make the Scottish Building Standards system achieve full cost recovery. It seems clear that the Scottish Building Standards system should achieve full cost recovery, especially at a time when public budgets are facing real term reductions and when the Scottish public may start to question the use of public funds to support a system that many feel is only of benefit to developers. Achieving full cost recovery will allow the Scottish Building Standards system the ability to stand up to public scrutiny and show other public departments the way forward. A fully funded and resourced Scottish Building Standards system should also provide the resource necessary to ensure Certification schemes are promoted and used so they deliver the originally intended benefits.

4. Any other issues relating to the regulations which you would wish to bring to the attention of the Committee?

The Scottish Building Standards system has been in place for more than ten years and seems conceptually and structurally sound. It does however need some additional funding and rigour to ensure it delivers the best outcomes for Scottish society. The Certification Schemes in place are robust and ensure the professionals for the disciplines covered take full responsibility for their work. This provides the opportunity for the professionals within local authority Verifiers to concentrate their efforts on all the many other areas of building works not currently covered by a Certification Scheme.
The broad proposals within the recent Fees consultation should help to address the wider resource issues currently evident and a properly resourced Building Standards Department could and should have the power to ensure compliance from all stakeholders. If proper functioning of the Building Standards system can be achieved, through a more consistent and regulated approach, it will provide Scotland with a fit for purpose and modern system that is sustainable and delivers for all.