Introduction
The tragedy of the Grenfell Tower fire on 14 June 2017, which claimed the lives of 72 people, rocked confidence in the building safety system in the UK.

The Ministry of Housing, Communities and Local Government (MHCLG) published a consultation on 6 June 2019 seeking views on proposals for a radically new building safety system which puts the safety of residents at its heart.

Safety reporting proposals
A key part of the new system is the safety reporting proposals for both fire and structural safety issues.

These will build on the existing CROSS (Confidential Reporting on Structural Safety) scheme sponsored by the IStructE, ICE and HSE, which collects voluntary reports on structural safety issues and freely shares the learning from these reports with industry on a no-blame basis. The aim is to help to prevent future failures and improve public safety.

The Government proposals for safety reporting for all those who work on buildings are to (pg. 71-74):

- Expand and strengthen the existing CROSS scheme to collect more voluntary reports on structural safety and to have a scheme for collecting reports on fire safety issues.
- Implement a new mandatory occurrence reporting system to the building safety regulator for key dutyholders to facilitate reporting of fire and structural safety issues.

Structural-Safety’s view
Structural-Safety fully supports the Government’s safety reporting proposals and their view that the best systems of oversight and regulation ensure that the people operating within them learn from their experiences, without fear of blame or retribution.

We believe that the expanded and strengthened CROSS scheme, along with the new mandatory reporting scheme, will complement each other to develop a safety focused culture in the sector and share intelligence to better understand safety risks and monitor safety trends. Effective safety reporting will be crucial to developing trust in the new building safety regulatory system and will lead to safer buildings.

Have your say
In the consultation, the Government want to know the level of support from the industry for the safety reporting proposals.

We would encourage both individuals and organisations to support the proposals by responding to the three consultation questions highlighted overleaf, while considering our comments on the questions when framing your answer. This should take you less than 15 minutes.

We ask for as many of you to respond as possible. If the proposals receive adequate support, MHCLG may be able to provide early approval for the support necessary for strengthening and extending the existing CROSS scheme.

The deadline for responding is 31 July, but we would encourage you to respond as early as possible so that we can take these proposals forward without further delay.
RESPOND TO THE CONSULTATION (PAGE 1 OF 2)

When you click on the RESPOND TO THE CONSULTATION link overleaf and get to the Table of Contents page, you can tick the Chapter 3 - Part C box if you want to only answer the three questions in this document - you do not need to answer all the consultation questions.

Q. 4.9. Do you agree that the Client, Principal Designer, Principal Contractor, and accountable person during occupation should have a responsibility to establish reporting systems and report occurrences to the building safety regulator? If not, please support your view.

- Structural-Safety support the proposal to establish reporting systems in organisations and for the lessons learned from these reports to be disseminated across the industry, following the methods used by CROSS.
- In the view of Structural-Safety:
  1. The existing voluntary CROSS reporting system for structural safety issues will be enhanced by the addition of reporting for fire safety issues to improve public safety.
  2. The introduction of mandatory reporting will also improve public safety and should be for occurrences where the level of risk for affecting life safety is high in buildings above 18m in height.
  3. Voluntary reporting through CROSS should be applied across all buildings, both above and below 18m in height.

YOUR RESPONSE

- To add your support, please tick the Agree box for this question.
- When you tick the Agree box, the online survey will not allow you to add text to support your view, so please add text to support your view to this question in your response to Q. 4.10 below. Where possible, present evidence to support your view e.g. explain how CROSS has helped you or your organisation to improve safety.

Q. 4.10. Do you think a ‘just culture’ is necessary for an effective system of mandatory occurrence reporting? If yes, what do you think (i) Industry (ii) Government can do to help cultivate a ‘just culture’? Please support your view.

(i) Industry
- The CROSS confidential reporting system has gained wide acceptance and has been successful in influencing changes in safety culture.
- An important feature of CROSS is the ‘just culture’ approach which informs without attributing blame.
- CROSS is industry led for the public good.
- By expanding CROSS, more safety issues will be captured and the lessons learned shared with industry to help to prevent future failures.

(ii) Government
- By backing CROSS, the Government will show a commitment to support a proven system for improving safety in the construction industry.
- The proposed extension of CROSS to collect and share reports on fire safety issues will give the fire engineering and firefighting communities a valuable tool to share fire safety information.

YOUR RESPONSE

- To add your support, please tick the Agree box for this question.
- Add text to support your view for how both (i) Industry and (ii) Government can help to achieve a just culture.
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Q. 4.15. Do you think the proposed system of mandatory occurrence reporting will work during the design stage of a building? If yes, please provide suggestions of occurrences that could be reported during the design stage of a building.

• This is a complex subject because frequently during design there are potential safety issues that are identified and designed out as part of the process. Indeed, this is an essential component of iterative design which will be strengthened by the proposed regulatory regime.
• Present your views on whether safety issues resolved during the design stage of a project (i.e. before construction begins) should be reported to CROSS on a voluntary basis or to the building safety regulator on a mandatory basis. Use examples to support your views where possible.
• If safety issues are not resolved during the design stage, they can manifest themselves as safety occurrences in the construction or operation stages of buildings, where the level of risk for affecting life safety can be higher. The proposed regulatory system is a safeguard in that the processes leading up to Gateway 2, before construction begins, are thoroughly scrutinised. Present your views on whether safety issues not resolved during the design stage of a project should be reported to CROSS on a voluntary basis or to the building safety regulator on a mandatory basis. Again, use examples to support your views.

YOUR RESPONSE
• Depending on your view, respond to this question by ticking either the Yes or No box.
• For either choice, the online survey will allow you to add text to support your view.

MHCLG encourage responses using the online survey link above. Alternatively, you can email your response to the questions in the consultation to buildingsafetyconsultation@communities.gov.uk, but please make it clear which questions you are responding to and include your name, your position (if applicable), the name of your organisation (if applicable) and an address (including postcode).

Your response will go directly to MHCLG, but if you have queries about the process, please contact Structural-Safety at cross@structural-safety.org.