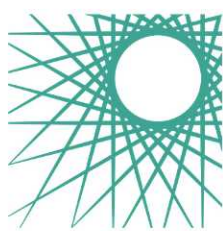


Beyond COVID-19: Recovery measures in building control in England as COVID-19 restrictions are eased

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About CABA

Chartered Association of Building Engineers (CABA), a member-focused organisation, is a unifying voice within the construction sector.

Bringing together members, who work across the life-cycle of the built environment specialising across a wide range of disciplines, CABA share knowledge, raises standards and develops professionals, enabling them to meet the highest standards we all expect of them.

By supporting our members CABA improves collaboration and competency ensuring that buildings meet our essential human needs, today and tomorrow.

About RICS

We are RICS. Everything we do is designed to effect positive change in the built and natural environments. Through our respected global standards, leading professional progression and our trusted data and insight, we promote and enforce the highest professional standards in the development and management of land, real estate, construction and infrastructure. Our work with others provides a foundation for confident markets, pioneers better places to live and work and is a force for positive social impact.



Contents

1 Introduction	1
1.1 Construction industry plans	1
1.2 Purpose	1
1.3 Limitations	2
1.4 Feedback	2
2 Key principals	3
2.1 General industry recommendations for individual behaviour to reduce risks associated with COVID-19	3
3 Pre-inspection safety considerations and time factors	5
3.1 Client (and relevant project stakeholder) engagement	5
3.2 Gathering site information before inspections	6
4 Site operations	7
4.1 Site inspections	7
4.2 Site meetings	8
5 Post-inspection safety considerations	9
5.1 What to do if you feel ill	9
5.2 After site inspections	9
5.3 Good practice COVID-19 administration	9
6 Professional accountability and responsibility	11
Appendix A Risk assessments	12
Appendix B Example COVID-19 risk assessment form	13

1 Introduction

COVID-19 has had a significant effect on construction in the UK, with many projects being put on hold and construction sites closing or seeing significant delays. As lockdown restrictions are gradually lifted, government advice in England on [going back to work](#) has identified construction as being one of the sectors encouraged to resume. RICS and CAGE are assisting and creating further clarity during this time by producing sector specific guidance for our members.

At the time of writing, there are several overarching sources of government COVID-19 recovery guidance, as follows:

- **Our plan to rebuild: The UK Government's COVID-19 recovery strategy:** sets out the timetable for lifting restrictions. The changes to policy in step one came into effect on Wednesday 13 May 2020 in England, and the government has advised that workers who cannot work from home should travel to work if their workplace is open.
- **Working safely during coronavirus (COVID-19):** The UK government, in consultation with industry, has produced guidance to help ensure workplaces are as safe as possible, including the latest government guidance on [COVID-19 vulnerable groups](#).

1.1 Construction industry plans

Now that lockdown restrictions are being eased in England, the [Construction Leadership Council](#) has created an Industry Recovery Plan (IRP), [Roadmap to Recovery – An Industry Recovery Plan for the UK Construction Sector](#), which sets out 3 key stages in the recovery process:

- 1 **Restart:** measures required in the short term (0-3 months) to support confidence and mobilisation of the sector, increasing the level of activity in construction, consistent with application of social distancing.
- 2 **Reset:** measures in the medium term (3-12 months) to evolve our ways of working for both COVID-19 resilience and improved long-term productivity.
- 3 **Reinvent:** measures developed now for the long term recovery beyond 12 months, taken to support recovery of the UK economy and delivery of the government's policy priorities.

1.2 Purpose

This guide is intended to build on government and wider industry guidance and provides practical advice to professionals working in building control (both local authority or approved inspectors – shortened to 'building control professional' in this document) on working as the COVID-19 lockdown measures are lifted and we work through the **restart** phase of recovery. It has been drafted with the valued support of professionals working in building control operations.

It will highlight the risks at key stages in the building control process, identify suitable control measures that can be adopted, and offer useful tools and advice on how the building control professional may mitigate some of the COVID-19 risks.



1.3 Limitations

It is important to note that this document is intended to outline good practice and provide useful advice for the building control professional during COVID-19 restrictions. Guidance has been extrapolated from high level government guidance where practicable in order to provide advice specific to the work of the building control professional. It is not intended to be highly prescriptive, to enable the professional to adapt the advice and use their own professional judgement for the individual situations they will face. It is critical that before any inspections are undertaken, building control professionals consider and assess the most up to date government guidance.

The document is not intended to replace existing safety guidance, such as [The Construction \(Design and Management\) Regulations 2015](#), and does not provide legal advice. If any legal risks are identified, advice should be sought from an appropriate legal professional. Recommendations and updates from the relevant authorities should always be followed, and site safety procedures for individual sites observed.

It should be noted that there are currently differences in construction site and building control procedures in devolved administrations and this guidance is aimed at England only. However, there is practical guidance within the document that may be useful to building control professional in all regions. Scottish government has produced a letter covering [useful guidance on the verification of building work in Scotland](#) that should be referred to by members working in Scotland.

The COVID-19 situation is fluid and the guidance provided in this document is relevant at the time of writing. The guidance will be reviewed and updated as necessary as the recovery situation changes.

1.4 Feedback

Lessons learned in good practice are important and any further comments from RICS and CIBE professionals on how they are tackling COVID-19 or comments on this document are welcomed. The [RICS Insight Community](#) can be used for this purpose, or by contacting CIBE at info@cibuide.com

2 Key principals

As COVID-19 restrictions lift, building control professionals should ensure they continue to provide the highest levels of service while adhering to current social distancing guidelines. They should safeguard the health and safety of other people while carrying out services on site in accordance with the public health guidance issued by the relevant public health body for the location of the services undertaken.

The UK government has published new '[COVID-19 secure](#)' guidelines to help employers reopen their businesses and ensure workplaces are operating as safely as possible under the current circumstances, including guidance [specific to construction sites](#). Guidance on [application of the building regulations](#) for building control bodies has also been produced by MHCLG and reference should be made to these documents.

It is recognised that part of the individual building control professional's work may include dealing with colleagues, members of the public and site operatives during site inspections, and the following guidance has been adapted from these key principles.

The building control professional should familiarise themselves with their employer's COVID-19 requirements/risk assessments and any site-specific health and safety or COVID-19 requirements imposed by the site owners.

2.1 General industry recommendations for individual behaviour to reduce risks associated with COVID-19

- Limit as much as possible any contact with people outside your household – this is the most important condition for staying healthy.
- Transmission is affected by both duration and proximity of contact; individuals should not be too close to other people for more than a short amount of time. When close proximity is necessary, stay side-to-side rather than facing people.
- When travelling, professionals should continue to avoid public transport wherever possible.
- Wherever possible, go directly from home to work and then back home, avoiding peak travel times.
- Wash your hands as often as possible with soap or use hand sanitiser or wet wipes when you are outside.
- Eat at home and/or bring your own food to work.
- If you are coming back from an area with high risk of contamination, follow the advice on the [NHS website](#).
- Don't shake hands. Use the knuckles of your fingers to touch the light switches, elevator buttons, etc.
- When at petrol stations, use a paper towel or disposable glove to operate the pump.
- Open doors with your elbow or otherwise, not your palm.
- Wash your hands for 20 seconds and/or use hand sanitiser before and after going into a property.
- When you return home or to your place of work, wash your hands with soap for 20 seconds and/or use hand sanitiser.

- Always bring hand sanitiser with you. Have hand sanitiser on hand near the front door of your home and in your car for use after visiting a petrol station or touching items when you cannot immediately wash your hands.
- Cough or sneeze in disposable towels and throw them away.
- If you are using disposable gloves, when you take them off, immediately wash your hands thoroughly.
- Aim to wear a face-covering in enclosed public areas.
- Avoid touching your face at all times.
- Where possible, avoid touching surfaces when in someone else's home.
- Follow a common-sense approach when interacting with, or entering, people's homes or other buildings.

3 Pre-inspection safety considerations and time factors

Guidance from MHCLG notes that site inspections can resume/continue where safe to do so, and although alternative methods of evidence collection are encouraged they should not form the sole means of verification. This means there are specific safety considerations for building control professionals and an assessment should be made to any additional time constraints these safety measures will add to the professional's service.

For new instructions, any COVID-19 related limitations should be considered and communicated to the client as appropriate with due consideration given to the effect this additional time may have on completing the service.

For existing instructions, consider how additional safety measures may impact on later stages of the service. Note that for Approved Inspectors time periods for initial notices can be extended under Regulation 17(7) of [The Building \(Approved Inspectors etc.\) Regulations 2010](#). Any potential COVID-19 limitations should be communicated to the client as appropriate.

If it is not possible to inspect or visit the property safely to the extent required to provide the service on a restricted basis, it may be necessary to decline the inspection/site visit and discuss alternative means of evidence.

If the instruction is accepted, any COVID-19 related restrictions to the service needs to be recorded, agreed and where appropriate notified in writing to client.

Building control professionals should always consider the safety and wellbeing of their employees in their decision-making process.

Say if it's not ok. Speak up or report any specific safety issues you encounter. This will allow knowledge of specific risks to be communicated and collaborative risk mitigation procedures to be put in place. CPNI provide useful resources through their [COVID-19 Workplace Actions campaign](#).

The checking of construction work in progress is an important process of the building control procedure and risk-based checks are normally made during the construction phase. However, responsibility for compliance with the building regulations remains with the person carrying out the work and, if they are not the same person, the owner of the building.

The use of remote evidence can assist the building control professional in checking the work they identify as requiring an inspection, providing this is planned and agreed in advance.

3.1 Client (and relevant project stakeholder) engagement

The term 'client' as it is used in this document means not only the contractual party who has appointed the building control services, but also other stakeholders in a project with whom the professional has to engage, as appropriate. In order to interact with the client and stakeholders safely:

- avoid physical contact where possible. Make contact by use of digital technology, for example email, video conferencing platforms or telephone, etc. where possible.
- act in a transparent and professional manner with all parties involved, and be clear with the client about any restrictions to the service as a result of COVID-19. Advise the client on the potential use of alternative evidence in lieu of site inspections, such as photographs or videos from the site. Clarify any limitations to using these methods, and where physical site inspections will still be required.

- consider how you will undertake any remote inspections, including compatibility of the client's or contractor's devices and software. For example, real time video links should be tested in advance to ensure the system and connectivity work before inspection.
- reiterate to the client that alternative evidence and remote inspections are based on trust, and that failure to properly represent the stage required for inspection could cause refusal of evidence and delay the project.
- the decision to offer or accept an alternative form of evidence should be balanced with the risk and complexity of the project, and will ultimately remain the building control professional's decision.
- brief the client on your safety restrictions early in your engagement to allow them to understand and make necessary arrangement for inspections, etc.

3.2 Gathering site information before inspections

Where site visits are necessary to inspect existing property or construction works, the following steps should be considered.

- Check your employers current risk assessment advice.
- Request the client's **COVID-19 secure certificate** if applicable.
- Ask the person requesting site inspections to confirm that sites and work are planned and organised to avoid crowding and minimise the risk of spread of infection by following PHE and HSE guidance.
- Ask the client for their risk assessment and any site-specific requirements.
- Check what social distancing measures are in place, and if any Personal Protective Equipment (PPE) is mandatory.
- Confirm if there are toilet facilities available for visitors.
- Check to see if site conditions or restrictions have changed since the last visit, if appropriate.
- Any professional planning or organising a visit to the property should confirm to the client that they have no COVID-19 symptoms.
- Confirm if the property is occupied.
- Request that the site or vicinity of your attendance is evacuated for the short time of the inspection, if possible.
- Ask if entry systems that require skin contact (e.g. fingerprint scanners) can be disabled, if possible.
- Request that any door handles and the like are cleaned before and after any physical site inspection, if possible.
- When inspecting residential properties, check first with the occupiers whether anyone has had COVID-19 or has any COVID-19 symptoms, are shielding or clinically vulnerable, or have not yet completed the required period of household self-isolation. If you need to record this information remember that it will be health data and subject to additional data protection requirements. RICS has recently published **Beyond COVID-19: Data protection and reopening the property market** to advise members on how to handle such information lawfully.

4 Site operations

The types of sites to be inspected and their constraints can vary significantly for building control professionals, from single occupancy dwellings with no client safety measures imposed to large construction sites with significant safety measures that must be observed. In all cases the professional should complete a risk assessment (see appendix A) based on the information gathered on the site, and brief clients on any safety requirements before attending, following any risk assessment advice from your employer. CLC have produced **Construction Sector - Site Operating Procedures** that, while aimed at contractors, sets out good practice for live construction sites that can be followed by visitors too.

4.1 Site inspections

Government guidelines give current recommendations around the use of PPE. Wearing a face covering is optional and is not required by law, including in the workplace, but note that some sites may have their own PPE requirements.

In line with recent UK government guidance, professionals and firms must ensure that the risk assessment for the business and premises they are visiting or inspecting addresses the risks around COVID-19. Consider the following:

- Always consider whether a physical site inspection is required or whether alternative evidence may be possible, for example obtaining photographs proving work has been completed in accordance with plans, virtual inspections etc. Document any decisions made.
- Site inspections should ideally take place outside of commuting times to avoid rush hour, particularly in areas where people are taking public transport. Whenever possible, public transport should be avoided.
- Adhere to current PHG relating to health and safety and PPE.
- Maintain a safe 2m distance whenever possible.
- If you are not able to work while maintaining a 2m distance, you should consider whether the activity should continue and, if so, carry out a risk assessment and respond accordingly.
- Where a 2m distance is not possible consistently, plan site inspections, including access and egress, to enable social distancing wherever possible.
- For smaller sites, occupants ideally should not be in the property while you are inspecting, if possible. If not, social distancing and PPE should be observed, as appropriate.
- Avoid peak site times for inspections where possible, and avoid contact with common contact surfaces in reception, office, access control and delivery areas, e.g. scanners, turnstiles, screens, telephone handsets and desks, particularly during peak flow times to larger sites.
- Avoid touching surfaces as far as reasonably possible during the inspection, and avoid touching your face.
- Allow plenty of space between people waiting to enter the site.
- Notify the client and/or site manager in advance of your arrival, and allow plenty of time to access the site where there are phased entry procedures, etc.

- On entering the site, wash hands or use hand sanitiser.
- Allow regular breaks to wash hands or use hand sanitiser where hand washing facilities are unavailable.
- Check the preferred safe routes for vertical movement on site, i.e. stairs or lifts in use. Consider the least congested option with best ventilation for vertical movement risk assessment.

4.2 Site meetings

Assess whether meetings can be held remotely using the appropriate digital technology. If this is not possible, consider the following.

- Where it is necessary to attend a site meeting, only those absolutely necessary to the meeting should attend.
- The meeting arrangements and safety procedures should be communicated to all parties prior to the meeting. If the organiser does not provide this, safety information should be requested including number of attendees, safety measures for the meeting, and why this meeting cannot be held remotely.
- Consider holding face to face meetings in open areas where possible.
- Meeting rooms should be well ventilated or have windows opened to allow fresh air circulation.
- Maintain a safe 2m distance in seating, etc. whenever possible.

5 Post-inspection safety considerations

Good practice during COVID-19 restrictions extends to more than just the site inspection. Normal professional reporting procedures should continue with keeping thorough records of any additional measures, in order to justify your decision-making process and facilitate the development of good 'lessons learned' in the workplace during safety reviews.

5.1 What to do if you feel ill

If you develop a high temperature, a new, continuous cough, or your sense of smell and taste change, you should follow [current NHS guidelines](#) for COVID-19 symptoms. You should:

- cover your mouth and nose with a tissue or your sleeve (not your hands) when you cough or sneeze
- put used tissues in the bin immediately and wash your hands afterwards
- inform your manager and follow any relevant workplace policies in place
- follow [current NHS and government guidelines](#) on self-isolation.

5.2 After site inspections

Once your visit is concluded, consider the following steps:

- Immediately after leaving the site, sanitise your hands with hand sanitiser.
- If you have used a vehicle to travel, clean surfaces in the vehicle using gloves and domestic cleaning products at the end of the day, paying special attention to areas touched by hand.
- Dispose of any disposable PPE used during the inspection in accordance with current PHG.
- Wash and sanitise any equipment or reusable PPE taken on site inspections in accordance with current public health guidance.
- Wash your hands with soap as soon as you get home.
- Wash clothes used during site inspections as soon as practically possible after the inspection (e.g. upon returning home).

5.3 Good practice COVID-19 administration

In order to keep thorough records of any additional measures, consider the following:

- Keep a record of any safety precautions undertaken during the site inspection or meeting, and any people you met during the visit. This information can be used for future contact tracing if necessary.
- Note any limitations that have been required to the service as the works have progressed as a result of social distancing measures and health and safety risks, record in the project file and notify the client as appropriate.

- For smaller projects (for example inspection of dwellings) and where practical to do so, recommend that the client carries out a deep clean in accordance with **government guidelines**.
- Record any situation where you could not follow full safety guidelines, for example instances where 2m distancing could not be followed.
- Record any alternative approaches that were utilised to mitigate risks, including any elements with alternative means of evidence, and why the decision was made to use alternative means.
- Report any hazards encountered during the inspection to the relevant site personnel and your manager as soon as possible, and keep a record of this.
- Communicate any valuable lessons to your manager for further review and to update risk assessments if appropriate.
- Update any risk registers active for the project or provide relevant information to those responsible for updating the register.

6 Professional accountability and responsibility

Building control professionals are expected to behave ethically and professionally, while taking adequate steps to consider health and safety at all times for all parties involved.

The government has set out enforcement measures to ensure compliance to social distancing guidelines. Professionals must adhere to government guidelines at all times.

Please note, in line with current government guidelines, people with symptoms going to work who cannot work from home, can [apply to get a test](#).

Appendix A Risk assessments

If you are employed, your employer has duties to ensure your health, safety and welfare. Your employer should identify any COVID-19 hazards likely for your job, and take action to remove or control the risk. The first step in considering the risk of working during COVID-19 restrictions is to understand what measures your employer has in place and review these regularly. It is important to report any additional risks that you find in practice to your manager. Further information on risk assessment is [available from the HSE](#).

There may be instances where you are required to carry out a risk assessment, for example in deciding on a particular course of action for site inspections for yourself or your team. If your employer has provided a risk assessment template, you should use that. An example template is provided in appendix B.

The following aspects may be considered in a risk assessment:

- Identify the potential hazards, using the general COVID-19 construction industry guidance, the information in this document, and information from your manager/employer.
- Identify who might be harmed. For COVID-19 risks, this could include you, your staff, other people on site and at home, for example.
- Identify any existing control measures in place.
- Estimate the risk probability.
- Estimate the impact of the risk, should it materialise.
- Calculate the resulting risk rating, for example high (red), medium (yellow) or low (green). This can be established using a probability/impact grid.
- Note the suggested risk response, for example accept, reduce, transfer, reject.
- State the proposed risk action.
- List who should carry out any actions, or a risk owner.
- Note when the action is needed by.

Appendix B Example COVID-19 risk assessment form

Cause of risk/ issue	Who could be harmed	Existing control measures	Prob. [1-5]	Impact [1-5]	Risk rating [R/Y/G]	Risk response	Risk action	Risk action by	Action required by	Status
Site visits to inspect foundation stage before covering up. Potential to spread/catch COVID-19	Surveyor, site operatives, surveyor's family	Site safety measures at site entry	4	5	HIGH	Reduce	<ul style="list-style-type: none"> PPE for surveyor. Organise inspection at quiet times. Organise arrival process at site gate and request area to be cleared. Avoid contact on site and maintain 2m spacing. During site inspection clean hands regularly. Post site, clean up and decontaminate. 	Surveyor and site agent	Before site inspection	Open
Site meetings. Potential to spread/catch COVID-19	Surveyor, client, site operatives, surveyor's family	Site safety, measure at site entry. Existing site meetings outside	3	5	HIGH	Remove	<ul style="list-style-type: none"> Conduct meeting via video conferencing. Client notified; architect has instructed all meetings including building control to be via video conference. 	Surveyor and client	30/05/2020	Closed
Travelling to site for inspections. Potential to spread/catch COVID-19	Surveyor, client, site operatives, surveyor's family	Government guidance points to avoiding public transport where possible	4	4	MEDIUM	Reduce	<ul style="list-style-type: none"> Limit inspection to car access. Stipulate that site inspections can only be taken on by those who can drive. 	Surveyor	Before site inspections are organised	Closed

Note: this is an example only and does not constitute risk mitigation advice, which must be conducted by the member or firm's own risk assessment.

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