

Research summary

Building Safety Regulator: Facilitating culture change in the built environment

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Research conducted by Verian

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Commissioning

This report is a summary of the findings of desk and qualitative research conducted by Verian between November 2023 and April 2024. The research was commissioned by the Insight and Service Design team in the Health and Safety Executive (HSE). The contents of the report, including any opinions and/or conclusions expressed, are the views of the agency alone and do not necessarily represent the views of HSE.

Background and objectives

Business context

Dame Judith Hackitt's Independent Review (2018) following the Grenfell Tower fire exposed industry failings in several key areas. These included: ignorance within the system (e.g., guidance not read or understood; indifference (e.g., a motivation to do things quickly and cheaply); and a lack of clarity around roles and responsibilities (exacerbated by fragmentation with industry).

In addition, Dame Judith's review acknowledged that there was a fundamental need to move away from a 'race to the bottom' culture to thinking about 'buildings as a system' and 'a very clear model of risk ownership'.

As a result of the review, HSE was tasked with setting up the Building Safety Regulator (BSR); and the Building Safety Act (2022) states that BSR must secure the safety of people in or about buildings in relation to risks arising, and improve the standards of buildings.

In response to the criticisms of industry culture made by the Hackitt Review, HSE is now developing a programme of work that seeks to encourage a culture change within the built environment sector in which industry is aware of, and takes responsibility for, driving this sustained and meaningful change.

Research objectives

HSE commissioned research to support this programme of work; exploring what BSR can do to facilitate industry to increase the safety and standards of all buildings and galvanise the cultural change required to do this.

Key research objectives were to:

- Build on existing models to create a draft culture change framework (to provide some structure and common language around the topic)
- Assess awareness levels and the appetite for culture change within industry, and explore the barriers and challenges to driving change
- Explore views of what roles and responsibilities BSR and industry should play in driving culture change
- Obtain feedback on the draft culture change framework from industry and iterate it based on these responses.

Research methodology

Phase one

Phase one involved a literature review and qualitative research with internal and external stakeholders that was conducted between November 2023 and January 2024. The purpose of this scoping phase was to identify existing culture change models, review BSR's strategic objectives, and develop a draft culture change framework for the purposes of BSR and industry.

The draft framework that was initially developed was discussed with internal stakeholders via two 90-minute framework development sessions.

Based on feedback, the framework was iterated, and this iteration was explored with four further internal senior stakeholders. Two more workshops were then conducted, comprising colleagues from the Ministry of Housing, Communities and Local Government¹, the Office for Product Safety and Standards (OPSS) and the Department for Business and Trade (DBT), once more to further develop the framework. The views of the Building Advisory Committee (BAC), the Industry Competence Committee (ICC) and the Construction Leadership Council (CLC) were also sought.

Phase two

In February and March 2024 qualitative research was conducted among organisations operating within the built environment. This involved 14 online group discussions lasting 90 minutes, which took place over two waves of activity and included a total of 42 participants.

The first wave included 11 online group discussions that aimed to represent a spread of those working in industry across different professions/trades, types/sizes of organisation and levels of responsibility and job role. This included:

- Higher-risk building (HRB) developers and non-HRB developers
- Architects
- Engineers
- Tier 1 contractors, trade contractors who were leaders in their organisation and trade contractors who were supervisors
- Building control managers and building control supervisors
- Building owners, Resident Management Company directors and managing agents.

¹ Formerly the Department for Levelling Up, Housing and Communities (DLUHC)

This part of the research explored participants' overall views on industry culture, awareness of the culture change agenda and the extent to which there was an appetite for change, and initial feedback on the draft culture change framework.

Of these participants, eight were selected, based on higher engagement levels during the initial groups, to participate in two reconvened groups within a second wave of research, alongside a group discussion with representatives from industry sector bodies. These sessions were used to validate the previous insight elicited and further iterate the framework.

While this sample is robust for a qualitative research study, it is still relatively limited. As such, these findings need to be treated as indicative of industry views, rather than fully representative.

Main findings

Developing the culture change framework

The starting point for this work was the clarification of the term ‘culture’. In its simplest form this can be defined as how the property of a group thinks, feels and behaves; influenced both by a group’s immediate environment, such as their peers or an organisation, as well as societal influences, such as the economy, the media or the government.

BSR’s overall long-term outcomes and impacts then constituted the foundation for the development of the culture change framework, as the framework needed to support and/or work towards these, particularly in terms of their relationship with industry. These included greater accountability, improved compliance, improved confidence and competence, and greater cooperation and trust.

Additionally, existing culture change frameworks were identified and considered when drafting the framework. These included the McKinsey 7-S framework, the Office of Rail and Road Risk Management Maturity Model (RM3), and the HSE Safety Climate Tool.

The work of the Industry Safety Steering Group (ISSG) and previous work carried out by the Ministry of Housing, Communities and Local Government (MHCLG) were also central to the drafting, due to the relevance of the key ‘pillars’ for change that had been identified through these workstreams. For example, the ISSG focused on ‘leadership and collaboration’, ‘competence and capacity’ and ‘transparency and responsibility’ as fundamental to driving up safety and standards.² The MHCLG model encompassed similar themes across five pillars: ‘leadership’, ‘collaboration’, ‘capacity building’, ‘responsibility’ and ‘transparency’.

BSR’s culture change framework was further developed through several iterations during the research period (both internal and externally via phases one and two) in response to feedback that enabled the research team to tailor the framework to the context of industry and needs of BSR. The current framework (see Fig. 1) features five pillars and is underpinned by the assumption that industry needs to play its part in developing interventions across these areas as a collective, and gradually shift behaviours so that they enable improvement in building standards and the safety of people in and around them. Key features of the framework include:

- The incorporation of an ‘awareness’ pillar (often absent from other models) to signify the need for engagement with and understanding of the framework and the need for culture change across all of industry. This was judged to be particularly important in this context because of the high risk to life associated with building fire and structural safety and standards

² [Building safety: The Industry Safety Steering Group’s third report for the Secretary of State and the Minister for Building Safety - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612123/Building_safety_The_Industry_Safety_Steering_Groups_third_report_for_the_Secretary_of_State_and_the_Minister_for_Building_Safety_-_GOV.UK_(www.gov.uk).pdf)

- An emphasis on the importance of leadership as part of the 'accountability' pillar in relation to both individuals and organisations
- Combining 'competence and conduct' into one pillar, to show that BSR wishes to see competency improved, as well as acted on, across the full range of industry behaviours
- Integrating 'communication' into the 'collaboration' pillar to emphasise the need to share knowledge, learnings and best practice across organisations, project teams, supply chains and professions
- Highlighting the importance of culture change being implemented in a sustainable way, i.e., embedded within working practices in the long-term, for changes in personnel and for future generations, as a key expectation.

Further to this, the research highlighted that there needed to be an underpinning emphasis that driving change is a non-linear, dynamic process that will involve continuous review, learning and improvement for both BSR and industry.

Fig 1. BSR's Culture Change Framework (current iteration)

Mindset and behaviours needed to improve the quality of *all* buildings, the safety of people who live in them and the wellbeing and working conditions of all those who regulate, design, develop and work on them

Everyone has a role to play: all those working in the design, construction, installation, management and regulation of buildings, and residents



Perceptions of industry culture

Participants tended to find the concept of 'industry culture' difficult to discuss overall, perceiving it to be vague and abstract; this was especially the case for more junior and 'on the ground' workers. Where the concept of culture was recognised by participants, they tended to relate it primarily to sectors, professions, organisations or projects.

Participants' perceptions and descriptions of the culture of the built environment were mixed overall. Notably, there was an inherent disconnect between the views of those working in the built environment in more strategic roles versus those focusing on project work. While many working in the largest companies or within a strategic role were proud of industry, viewed their work as pivotal for economic growth, and felt challenged by and satisfied with their work, others frequently experienced the industry negatively. These participants, particularly those who were working in trades, e.g., scaffolders, electricians and roofers, described a highly stressful work environment. For example, time and cost pressures, concerns about safety and building quality, a lack of autonomy and teamwork, long working hours and poor mental health were frequently reported.

When describing industry, participants characterised it as being fragmented on account of its size and the diversity contained within it. Participants recognised that it comprises a range of 'levels': government and regulators, sectors and professions, organisations and individuals – and that there are divisions within these levels. For example, at a government level there are differences in policy between the different devolved nations; and there are significant variations within and between professions and trades, often relating to the type of work they conduct.

Variations were identified as being particularly acute at an organisational level, with participants highlighting a significant cultural divide between larger organisations that conduct commercial and HRB work versus companies and contractors that conduct smaller-scale domestic work. On top of this, participants emphasised variation in terms of organisational size, the type of work conducted, and the focus placed on cost and quality. At an individual level, differences in roles and qualifications, attitudes and conduct were also evident.

In this context, participants did not recognise a 'whole system' industry culture. Responses to the term 'built environment professionals' were explored within the research, as this is a collective term commonly used by BSR to refer to those working in the design, construction, management and maintenance of buildings. However, this phrase was not resonant with participants, as they felt it implies a level of experience, status and/or professionalisation that may exclude certain roles or sectors, particularly building managers and tradespeople.

While most participants agreed there is a need for culture change, many doubted the feasibility of this happening imminently because of the numerous barriers they could identify at each 'level' of industry. For example, at the level of government, legislation and regulation seemed disjointed across departments and disconnected from the way BSR describes its focus on safety; and at an industry, sector and project level there was a

perceived lack of oversight, inspection and enforcement of standards by BSR, industry bodies and local authorities. Barriers to cultural change at an organisational level were listed as including time and cost pressures on organisations, skills shortages, and a lack of awareness, understanding or perceived need or incentive to change.

Participants working on HRBs also expressed a sense of 'change fatigue', as over the last few years their organisations have been directed by the new regime to adapt and align their practices and processes. In this context, they believed that it will be most important to focus culture change activity on small and medium-sized enterprises (SMEs) conducting non-HRB work. Poor culture within this part of industry was a significant focus of concern for many participants. They felt that these organisations were most in need of change but were least well placed to do so, having the least agency and awareness of the need to change, and being less touched by the requirements of the new regime. Having said this, previous HSE research has highlighted that there is a significant diversity of size, capability and culture within SME (sub)-contractor companies.³ Though, despite this level of diversity, participants felt that all SMEs would be likely to require extra support to drive culture change, such as guidance and financial incentives.

Awareness and perceptions of BSR and the culture change agenda

Awareness of BSR and the new regime was mixed and largely affected by participants' level of seniority and focus. Those in roles that were more junior or with less strategic or health and safety focus tended to have low awareness of BSR, whereas those whose roles were more senior, strategic or directly related to the new regulations were much more aware. Having said this, participants generally lacked clarity about what BSR represents, and some expressed negative perceptions of BSR and the new regime, for instance believing BSR to have a narrow focus on HRBs (rather than industry more widely), be communicating inconsistently and not demonstrating the capacity and expertise to support industry confidently.

Awareness of a formal culture change agenda within industry was generally low, although often participants working for medium-sized organisations tended to have some awareness of the drive for change, which they had inferred from the volume of new regulation being operationalised. While these participants did not understand this as a holistic strategy or aim, participants representing larger organisations working on HRBs did, and this group felt they had been engaged in the change agenda for some time. These participants reported that their organisations had introduced policies and approaches to support organisational change and were encouraging good practice within their sector and through supply chains.

Participants supported the intent of the culture change agenda and felt that culture change, despite the challenges facing industry, was possible. Participants often pointed to

³ Small construction businesses, Kantar Public, 2017

the work of HSE in improving workplace health and safety as inspiration for achieving culture change in this context.

Participants perceived all parts of industry as having responsibility for driving change, including organisations, individual practitioners, residents, industry press and the national media. However, participants saw BSR, in collaboration with sector bodies, as needing to play a crucial role.

Participants suggested that BSR would ideally be:

- Setting a vision for culture change and providing clear expectations and guidance for 'what good looks like'
- Collaborating with sector bodies to unify industry
- Having the responsibility to regulate and address poor industry practice.

Participants felt sector bodies should ideally be:

- Raising awareness among members
- Setting minimum sector standards and providing training and assessment programmes
- Monitoring competence and identifying activities to address any issues with this
- Driving continuous improvement within their own part of industry.

Responses to the framework

Participants broadly accepted the framework. The pillars resonated with participants and they welcomed a holistic view that sets out what BSR and industry is aiming to achieve. Participants believed this would help industry to understand the reasons for the requirements being important and the overall objectives. While all the pillars were seen as important and interconnected, participants tended to believe that the 'accountability and leadership' and the 'competence and conduct' pillars were most important for driving change. However, some viewed accountability as the most significant pillar overall. Some participants also felt strongly that the framework needs to include an enforcement or oversight pillar to ensure that organisations are sufficiently motivated to invest in change.

Some participants had concerns about the framework at an overall level, as they perceived it as being too vague and lacking in specificity regarding what it will mean in practice for the different 'levels' of industry, e.g., professions, trades, organisations and individuals. Further issues were raised about: the suitability of all the language used, particularly taking into consideration the range of audiences the framework aims to target; the possible cost and resource that will be required to implement it, especially for SMEs; and the potential burden of evidencing change.

In relation to the usability of the framework, responses were mixed. For those already conducting significant work to meet BSR requirements and align their practices to the regime, the framework felt less relevant. Participants from other organisations, especially medium-sized organisations with a focus on HRBs, reported sometimes having access to relevant resources to implement the framework, although highlighted that they may face constraints on this, such as lack of leadership buy-in or engagement. Smaller organisations with a focus on small-scale domestic work found the framework useful in principle but, without greater tailoring to their sector and BSR support, anticipated difficulties with putting it into practice.



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