

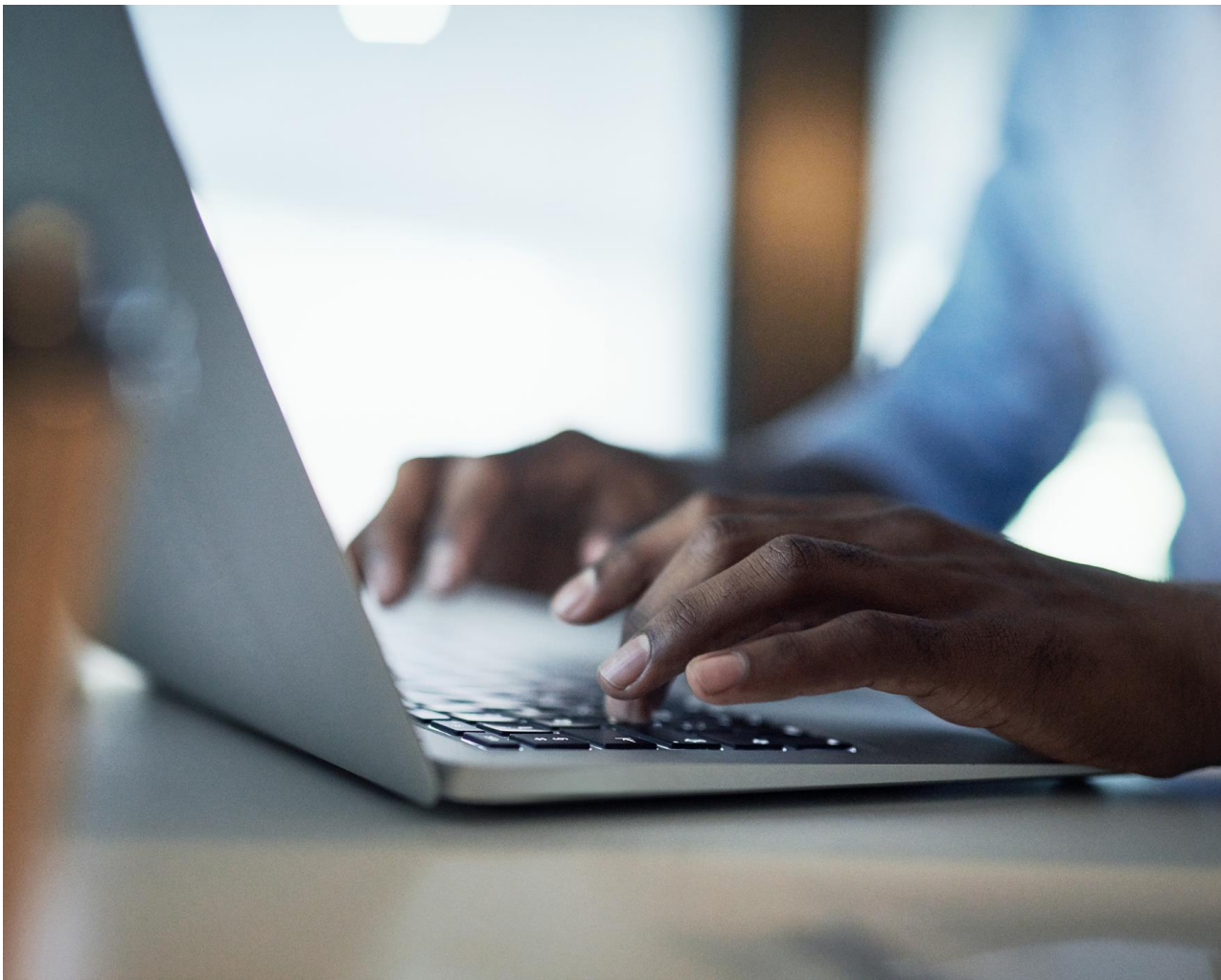
Research summary

Building Safety Regulator Insight: Key Building Information guidance research

Commissioned by Insight and Service Design Team, Health and Safety Executive

Conducted by Kantar Public

October 2023



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Commissioning

This report is a summary of the findings of a qualitative research study conducted by Kantar Public in August 2023. The research was commissioned by the Insight and Service Design in the Health and Safety Executive (HSE). The content of the report, including any opinions and/or conclusions expressed, represent the views of those taking part in research and do not necessarily reflect the views of the HSE.

Background and objectives

Business context

Section 78 of the Building Safety Act sets out that the Principal Accountable Person (PAP) for a high-rise building (HRB) must apply to register the buildings for which they are responsible. The submitted data will establish a point of contact between the Building Safety Regulator (BSR) and PAPs to enable the oversight of building safety matters and enforcement.

In addition to their duty to register their building, PAPs will also need to submit Key Building Information (KBI), which is more detailed than that needed by the registration process and includes information about the building structure and fire / smoke controls.

The registration period for existing buildings opened in April 2023, with the requirement that all PAPs must register all occupied HRBs by October 2023. From October 2023, new buildings must also be registered before they are occupied. KBI must be submitted in the 28 days following registration, although this period was open until the end of October 2023 for any buildings registered during the initial registration period.

BSR has developed guidance to support PAPs in identifying and submitting KBI for their buildings, which was made available via GOV.UK in May 2023¹.

Research objectives

Research was commissioned to understand organisations' progress in submitting KBI, including any barriers or challenges faced, and to collect feedback on the KBI guidance in terms of clarity, language, structure, design and relevance.

¹ <https://www.gov.uk/government/publications/giving-bsr-structure-and-fire-safety-information-key-building-information/building-safety-regulator-giving-us-structure-and-safety-information-key-building-information>

Research methodology

This research consisted of 20 one-hour online interviews with individuals representing PAPs in England.

The research sample was structured around the PAP types developed by BSR based on previous research and included coverage of:

- 4 Commercial Ownership and Development organisations
- 3 Student Sector organisations
- 4 Public Sector organisations
- 3 Managing Agent organisations
- 6 Resident Management Company (RMC) and Right to Manage (RTM) organisations

While this sample was robust for a qualitative research study, it is important to emphasise that findings should be taken as indicative and may not fully represent all views within the profession.

Main findings

Awareness of the need to submit Key Building Information

Most participants in this research were aware of the need to submit KBI and had a good understanding of the requirement, based on communications from the HSE BSR e-bulletin and other industry sources. The level of information required was generally in line with expectations.

The exception to this was amongst some RMCs and RTMs. This group were more likely to express confusion around the need to submit KBI. They included reporting a lack of understanding between the submission of KBI and the submission of a safety case or conflation with the requirement to register with local fire services. There were also related misunderstandings around how KBI submission relates to registration.

Preparedness to submit KBI

Most organisations felt prepared and were in the process of preparing KBI, with a minority having already submitted KBI for their building(s). Information was typically being gathered from a review of existing documentation and building walkarounds, then collated into spreadsheets prior to submission.

A minority of organisations felt less prepared. This included some RMC/RTMs with a limited understanding of or engagement with the need to submit KBI. It also included some Public Sector organisations with large portfolios of buildings, due to the large amount of work required to collect KBI across their portfolio.

KBI information was considered easier to collate if it is available in existing documentation, such as risk assessments, or if it can be acquired from a building walkaround. This included information about fire and smoke controls, fire doors, energy supplies, staircases, building use and connections. It was considered more difficult to collate when it is not available in existing documentation or requires the carrying out of new surveys, in some cases due to changes to a building, such as ongoing cladding replacement. This information typically related to the external walls or building works since the original build.

Barriers to submitting KBI

Some organisations were facing barriers to registering their building(s), which was in turn acting as a barrier to submitting KBI. This was typically due to confusion or dispute over the allocation of the PAP role stemming from different interpretations of the Building Safety

Act. This was observed amongst Commercial Ownership and Development and Student Sector organisations for which buildings had complex ownership structures. It was also observed amongst some RMC/RTM organisations where there was a lack of clarity with managing agents around the allocation of roles.

Organisations also faced a range of barriers to submitting KBI itself. Some of these related to an organisation's portfolio of buildings. For example, some PAPs overseeing many buildings stated that the volume of information required was leading them to feel concerned about collection and submission within the required deadlines. PAPs with responsibility for older buildings also felt that they faced challenges, as it meant that they generally had less up-to-date information to hand. Public Sector organisations were most affected by these issues, but they were also mentioned by some Commercial Ownership and Development and Student Sector organisations.

RMC/RTMs also faced distinct barriers to submission, due to their lower levels of expertise and understanding compared to other organisation types. It is worth noting that this was not uniform across all RMC/RTMs and those with experience of the Building Safety Fund typically had greater confidence in comparison to those without.

Across organisations, some also cited a lack of clarity in the guidance as a barrier to progression. Here confusion around how to respond to questions relating to lift types, connections and external wall calculations in particular were raised as barriers.

Finally, some organisations of different types across the sample mentioned a concern about the repercussions of submitting wrong or incomplete information. They could report feeling unclear about expectations from BSR around the extent to which organisations would be expected to make effort to obtain information.

Responses to the guidance

Participants were generally positive about the guidance in relation to its language, structure and use of examples. It was found to be well-written, making use of simple and straightforward language that avoids being overly technical. It was also considered to have a style that would be engaging for non-expert audiences. The accessible and familiar GOV.UK style was found helpful. The fact that the structure of the guidance follows the same order as the actual KBI submission form was seen to aid its usefulness as a practical document, as was the inclusion of concrete examples (e.g. relating to lift types).

Participants identified some areas in which the guidance could be improved. Some felt that there was a lack of clarity around the exact evidence or documentation needed to demonstrate different elements of KBI. Other participants expressed a desire for further information on why information is being collected and how this will improve building safety, to help provide context to what they are being asked to do. Related to this, some wanted

further information on the consequences of failing to provide information or unintentionally providing inaccurate information.

Communication of the guidance

Participants stated that it would be important for HSE to continue to communicate about KBI and other aspects of BSR duties via the BSR e-bulletin. In addition to this, many PAPs expressed an interest in face-to-face workshops or online webinars. These were considered to be valuable as they allow PAPs to ask questions around specific areas that are unclear, whilst also facilitating interaction with other stakeholders and PAPs. For RMC/RTMs, social media was also seen as an important source of information and was sometimes used as a way to interact with others RMC/RTM representatives (e.g. in Facebook groups).

Further information

For information about health and safety, or to report inconsistencies or inaccuracies in this guidance, visit [the HSE website](#).

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