

15 October 2021

**Written evidence submission to the Building Safety Bill Committee –
Joule Group International Limited
 (“Joule Group” or “the Company”)**

1. Introduction

1.1. Joule Group is a leading specialist UK fire safety engineering company comprising fire safety designers, engineers, consultants, technical specialists, and digital solutions providers.

2. Executive Summary

- Joule Group is highly supportive of the Committee’s advancements in raising fire safety industry standards and significantly enhancing the protection of residents.
- Joule Group welcomes the opportunity to submit evidence to the Building Safety Bill Committee and to contribute to the improvement of fire safety standards and the protection of the public.
- Joule Group draws the Committee’s attention to the capabilities of TFS-Compliance, Joule’s proprietary digital solution to analogue fire safety systems. Joule Group considers the ways in which TFS-Compliance can assist the sector in meeting the revised fire safety standards proposed by the Bill.
- The potential applications of TFS-Compliance include: the establishing of a voluntary occurrence reporting system, the assembling and aggregating of data required by the new Regulator, the documenting of competence qualifications for prescribed persons, and the facilitating of a system that enables real-time data collection and submissions to be made to the Regulator.
- Joule Group suggests a number of drafting amendments to the Bill, including: the updating of regulation for buildings that do not meet the Committee’s ‘high risk’ criteria; clarification on the incoming guidance relating to the maintenance of the golden thread of information, and when this may be made public; and the extension of the requirement to register the competence of legally responsible persons conducting fire risk assessments (FRA) to include a duty to register the competence of the team or individual assisting in FRAs.

- Joule Group is at the Committee’s disposal and would be happy to supply further evidence to the Committee.

3. Background

- 3.1. Joule Group is passionately committed to ensuring fire safety is considered – and systems implemented to support the effective delivery of fire safety – at every stage in the life cycle of the built environment in order to minimise the threat to life, maximise the scope for onboarding technological advances and innovation into revisions to Statute law, and ensure the UK continues to be a global leader in fire safety standards setting and enforcement.
- 3.2. Joule Group believes that, as a team of leading UK industry experts, it is well placed to offer advice to the Committee with a view to informing their thinking and helping to ensure the Bill succeeds in its critically important aim of minimising risk to human life.
- 3.3. Joule Group offers its submission in two parts: firstly, it shares information regarding its innovations which it believes have potentially transformative market benefits; and, secondly, it offers its own analysis of the Bill and a number of drafting amendments that it believes would make the Bill more effective, comprehensive and future-proofed.

4. Information

- 4.1. Joule Group is the developer and owner of TFS-Compliance (“TFS”), a proprietary digital solution to the problems posed by existing fire safety systems.
- 4.2. Founded on decades of fire safety engineering experience and expertise, its underlying purpose is to digitalise the compliance process for all stakeholders in the built environment.
- 4.3. Joule Group’s TFS software delivers a technology platform and holistic fire-safety solution that no one else in the market currently provides.
- 4.4. Users engage with TFS-Compliance software through an app in which they can conduct fire safety checks, record issues photographically, upload and store documents, devise assessment schedules, and create reminders. This information is compiled into a reporting dashboard.
- 4.5. These features facilitate the creation, first, of proactive and systemic risk-management processes and protocols and, secondly, the extraction of tailored insights formed from the collection of inspection data. In this way, they aim to inform understanding of and

collate insights into the effective promotion of continuous improvements in fire safety standards in new build and renovations and promote early adoption.

4.6. Regarding part 2: clauses 2-8

4.6.1. Joule Group welcomes the changes provided for by these clauses. In particular, Joule Group attaches particular importance to clause 8 (1), namely that: ‘the regulator must make arrangements for a person to establish and operate a voluntary occurrence reporting system.’ Joule would like to draw the Committee’s attention to the capability of its TFS system to fulfil these clauses which is the only electronic solution on the market capable of meeting this public policy aim in a single, stream-lined product.

4.6.2. TFS will meet the needs of the proposed safety case report, and assembles and aggregates the data required by the new Regulator, enabling their office to audit and verify the status of fire safety in an efficient and comprehensive way.

4.6.3. TFS has the potential to be developed, through further software upgrades, to provide a seamlessly integrated system for submissions to be made by regulated businesses to the Regulator for approval, enabling improved efficiency and enhanced levels of compliance, without any compromise to safety standards.

4.6.4. Regarding part 3: clause 32

4.6.4.1. Joule Group would like to highlight TFS’s potential to meet the requirements provided for in this clause. TFS is a digital tool uniquely well suited to enable key information "to be stored and used effectively to ensure safer buildings" and "make information easily available to the right people at the right time", as provided for in the seminal 2021 policy paper [*Building Regulations Advisory Committee: golden thread report.*](#)

4.6.5. Regarding part 3: clause 34

4.6.5.1. Regarding the introduction of competence requirements for appointed or prescribed persons, Joule Group intends to develop TFS further to integrate the assemblage and documentation of relevant accreditation and competence qualifications of users of its software. There is scope to apply the software upgrade to those who fall within the proposed regulatory perimeter (*eg* building managers, maintenance individuals and companies, suppliers, and other prescribed persons) and ensure their adherence to agreed statutory controls is efficiently monitored.

4.6.6. Regarding part 3: clause 52

4.6.6.1. Clause 52 provides that the Regulator establish and maintain a central electronic register of information from registered building control approvers. TFS is a tool uniquely configured to facilitate this kind of data collection and storage. Joule is therefore well positioned to enable the intentions behind the Bill and the duties that it provides for, as enacted, to be adopted efficiently and to support enforcement.

4.6.7. Regarding part 4: clause 75

4.6.7.1. Clause 75 provides that applications for building assessment certificates must be accompanied by a building safety report, along with various other prescribed information. TFS will be a valuable tool for facilitating the collation of this critically important information.

4.6.8. Regarding part 4: clause 88

4.6.8.1. This clause provides for the collection and storage of data by those responsible for ensuring building safety. Joule Group agrees that this is a vitally important and timely addition to existing fire safety legislation. As previously indicated, it may be helpful to the Committee to know that a platform already exists that facilitates this kind of data collection and management. That software is TFS-Compliance.

4.6.9. Regarding part 4: clauses 91-94

4.6.9.1. These clauses set out the proposed statutory requirements for the formation of strategies to engage with residents regarding building safety. The Bill also provides for the creation of a system for the investigation of relevant complaints. As a platform, TFS is uniquely well placed to provide tenants with clear and simple fire safety information. The software can be developed further to provide for tenant feedback in a way that seamlessly integrates with existing tenant management systems.

4.6.10. Regarding part 4: clause 134

4.6.10.1. The Bill provides that fire risk assessments must be recorded in full by the persons legally responsible. It may be helpful for the Committee to know that data collected by TFS over a 12-month cycle provides highly relevant comprehensive and real-time information for completing fire risk assessments (FRAs). TFS is a platform ideally suited, and uniquely equipped, to record – and share – fire safety arrangements. Additionally,

upcoming TFS features will include a built-in FRA provision. No other software on the market can do this.

4.6.10.2. The Bill also provides that legally responsible persons must keep residents informed of relevant and detailed fire safety information. TFS already possesses the software capability to meet this prospective statutory requirement, facilitating the intention of this clause, as enacted. Again, no other software currently can fulfil this role.

4.6.10.3. The Bill also provides for co-operation and co-ordination between legally responsible persons and the maintenance of a shared record of information. Joule Group's unique product can facilitate this with ease. Indeed, preserving the golden thread of information is the central purpose of TFS.

4.6.10.4. The Bill provides for co-operation and co-ordination between Responsible Persons and Accountable Persons, and the sharing of data between these parties. TFS-Compliance would be the ideal software to provide this platform.

5. Suggested amendments

5.1. General

5.1.1. Joule Group very much welcomes and supports the Bill's proposed changes to fire safety regulation which it believes will contribute to higher industry standards and significantly enhanced protections for residents. Nonetheless, the narrowness of the Bill's application does give rise to some concerns. Presently, the Bill relates only to 'high risk buildings.' The Bill defines these as buildings with a height of over 18m (or at least 7 storeys). Updating legislation only for a particular, and incomplete, cross-section of buildings may create an imbalance in regulation practices across the sector. There is likely to be confusion for many in the sector, especially for those market participants with mixed portfolios containing both residential and commercial buildings of varying heights. While fire safety standards might improve in 'high risk buildings,' the safety standards of the buildings not considered in this Bill are at risk of declining. In the midst of recruitment drives, restructuring efforts, and investments being made in technology, it is possible that some organisations in the sector might be inclined to favour more consistent regulation, for streamlining purposes. Joule Group

would like to see this potential variance pre-empted and addressed by the Committee, either by the issuing of further guidance or follow-up regulation for other building types, or a widening of the Bill's focus to ensure consistency and raise standards (and, therefore, safety) across the built environment and prevent there being unintended consequences from this laudable new legislation.

5.2. Regarding part 3: clause 32

5.2.1. This clause provides for new powers that allow building regulations to set out procedures and requirements to maintain a golden thread of information. Joule Group recognises the existence of supporting documents in respect of this, such as the BS 8644-1: Digital Management of Fire Safety Information consultation. However, Joule Group calls for further clarification here on what new guidance is being prepared and when this may be expected to be made public, in order that market participants have sufficient lead-in time to prepare for any significant changes in the current regime.

5.3. Regarding part 3: clause 52

5.3.1. This clause mandates that the Regulator establish and maintain a central electronic register of information from registered building control approvers. In relation to this, Joule expects – at a minimum – guidance on the common data structure that external software, like TFS, can utilise to interface with a regulator's management system. This would enable TFS-Compliance to make safety case submissions directly to the Regulator's software, allowing for the Regulator to receive immediate feedback on the status of fire safety seamlessly and efficiently. In Joule Group's view, it would clearly be in the interests of all concerned that this should be the case.

5.4. Regarding part 4: clause 88

5.4.1. This clause relates to the creation of regulation that requires accountable persons to give copies of prescribed information to relevant parties. Joule Group suggests that the wording in this clause does not provide for the sharing of information that is not covered by mandatory occurrence reporting or the safety case if it is in breach of data protection legislation. In the interests of clarity and for avoidance of future doubt, Joule Group recommends that this distinction is explained more explicitly.

5.5. Regarding part 4: clause 134

5.5.1. This clause relates to the competence of fire safety professionals, and the expectation that those assisting legally responsible persons in reviewing or undertaking fire safety assessments should be effectively trained in fire safety. Joule Group recommends that the Bill introduce a duty to register the competence of the team or individual assisting in conducting the fire safety assessment.

6. Conclusion

- 6.1. Joule Group hopes the Committee will have found its thoughts and observations helpful and constructive.
- 6.2. Joule Group believes that the draft legislation is hugely to be welcomed and overdue.
- 6.3. Joule Group are experts in fire safety and standards setting. The company also possesses unique proprietary software that could give immediate and systemic effect to the Bill's intentions and provisions.
- 6.4. Accordingly, Joule Group is at the Committee's disposal and would be happy to supply further evidence to the Committee, including oral evidence, should the Committee find this useful.