



BS 99001 and the UK Building Safety Act:

A framework for quality and compliance in the built environment



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Note from the Author



“The Building Safety Act has reshaped the UK built environment, challenging us not just to understand our legal duties, but to embed them in everyday practice. BS 99001:2022 was developed by the sector, for the sector, to translate quality principles into practical action. This whitepaper connects BS 99001 with the Building Safety Act, offering clear guidance on how quality management supports compliance, safety, and competence. My hope is that it gives you confidence to turn intent into action and to play your part in building a safer, higher-quality future.”

Gena Ibraev, CQP MCQI, IDipNEBOSH, IRMCert

BSI Standards Volunteer, Chair of Technical Committee
B/570 Quality Management in the Built Environment Sector



Peer Perspectives

“ This whitepaper demonstrates how the standard can assist in achieving the requirements of the BSA, as the very nature of BS 99001 provides more construction-specific requirements above and beyond ISO 9001. The enhancements brought by BS 99001 lead to more robust arrangements and more rigorous monitoring, in order to meet the complex requirements of the built environment sector.”

Adrian Shah-Cundy – Group Health, Safety, and Quality Director, VolkerWesselsUK.

“ Some people have asked how BS99001 would help organisations comply with the Building Safety Act, this paper helps demonstrate the links between legislation and the quality management standard.”

Steffan Speer – Morgan Sindall Technical Director and Chartered Quality Institute Construction Special Interest Group Network Lead (Chair).

“ Laing O’Rourke is proud to have undertaken a peer review of this important white paper, which demonstrates how BS 99001 bridges the gap between regulatory requirements and practical delivery in the built environment. BS 99001 sets a new benchmark for quality management in the built environment, driving accountability, supporting organisational competence and capability, and ensuring transparency through robust assurance information at every stage of the project lifecycle.

“As the first UK group to achieve certification to BS 99001 across all entities, we have seen first-hand the impact and benefit with our clients, and across our operations”

Leigh Holland – Head of Quality & Building Safety, Laing O’Rourke.

1. Executive summary

The 2017 Grenfell Tower tragedy exposed gaps in accountability and information management across the UK construction sector, highlighting the urgent need to strengthen safety and quality. In response, the Building Safety Act 2022 (BSA) established a new regulatory landscape. It enabled the introduction of statutory dutyholder roles, a Gateway approval process for higher-risk buildings (HRBs), the 'golden thread' of building information for higher-risk buildings, and robust enforcement powers.

However, while legislation defines *what* must be achieved, it does not prescribe how organizations should embed these principles into the reality of complex, multi-tier construction projects. Without a clear, operational framework, organizations risk statutory duties becoming procedural rather than daily proactive practices.

BS 99001:2022 *Quality management systems. The specification for the application of BS EN ISO 9001:2015 in the built environment sector* provides a strong link between legislative intent and operational practice. Developed by UK industry experts under BSI governance, BS 99001 builds on ISO 9001 as the globally recognized international standard for quality management, providing additional requirements tailored to the construction sector.

BS 99001 embeds additional requirements and guidance that directly address the sector's unique risks, project-based nature, and lifecycle responsibilities. By combining governance, competence assurance, information control, and lifecycle quality verification into a single management system, BS 99001 gives organizations a clear framework to demonstrate compliance with the BSA and its associated secondary legislation.

This white paper shows how BS 99001 aligns with the core requirements of the BSA and its associated secondary legislation. It explains how the standard helps translate legal obligations into structured management practices: clarifying leadership roles, embedding competence across the supply chain, controlling information from design through to operation, verifying readiness for HRB Gateways, and maintaining audit-ready evidence for regulators.

This approach benefits all stakeholders: clients can achieve smoother HRB Gateway approvals and reduced lifecycle risk; designers can produce traceable, integrated outputs; principal contractors and designers can better control competence and verification; and suppliers can position themselves as reliable, 'Gateway-ready' partners.

Widespread adoption, backed by a UKAS pilot scheme for accredited certification, client-led procurement, and regulator endorsement, can unify the sector under a common assurance language. This approach bridges the gap between law and practice, ensuring the ambition of the BSA is matched by the operational capability to deliver safe, high-quality buildings.



2. Introduction

The 2017 Grenfell Tower tragedy exposed serious gaps in accountability, information management, and quality oversight across the UK construction sector. Dame Judith Hackitt’s 2018 independent review described a cultural issue across the construction sector, which she termed a ‘race to the bottom,’ caused either through ignorance, indifference, or because the system does not facilitate good practice. The review highlighted profound shortcomings, prompting comprehensive reform to place safety and quality at the centre of industry priorities.

The subsequent enactment of the Building Safety Act (BSA) forms the statutory foundation for this change. However, legislation alone cannot drive the deep-seated governance and cultural transformation required. To bridge this gap, industry-developed standards like BS 99001 are essential components of the overall assurance framework.

BS 99001 was developed in early 2020 by the BSI technical committee for ‘Quality Management in the Built Environment’ (Currently – Technical Committee B570, at the time of development and publication of the BS 99001 standard – a Sub-Committee QS/1/4). The standard harnesses industry expertise, applying lessons learned

and expanding upon the ISO 9001 framework with sector-specific requirements for the built environment. It is not a replacement for ISO 9001, but rather an enhancement; BS 99001 cannot be used independently of ISO 9001. Following extensive consultation, BSI published the standard in mid-2022.

To make implementation easier, BSI also produced PD 99001:2022, a companion Published Document that presents the content of BS EN ISO 9001:2015 alongside the respective additional requirements from BS 99001 in a single, clause-by-clause format.

The overall industry quality assurance framework can be outlined in three tiers:

**Tier 1.
Legal requirements**

The BSA and its secondary legislation, overseen by the Building Safety Regulator.

**Tier 2.
Industry-led assurance**

Standards such as BS 99001, demonstrated via internal audits and voluntary third-party certification by impartial Certification Bodies (CBs), which can be accredited or not accredited by UKAS.

**Tier 3.
Organizational management systems:**

The internal governance and procedures that implement legal and standard-based requirements in daily practice. BS 99001 provides the mechanism for Tier 3 to robustly meet the demands of Tier 1 and be verified through Tier 2.

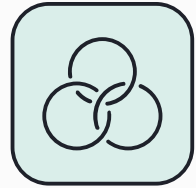
3. The Building Safety Act: Key duties and enforcement mechanisms

The BSA and its secondary legislation enabled a structured regulatory framework built upon clear dutyholder responsibilities, phased oversight, and robust enforcement:



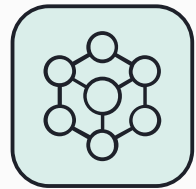
Defined dutyholders under The Building Regulations:

Clearly articulated roles including clients, designers, contractors, principal designers, and principal contractors.



HRB Gateway approval process:

A three-stage* process for higher-risk buildings, overseen by the Building Safety Regulator.



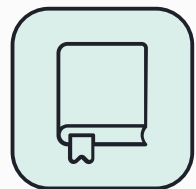
The golden thread of information for HRBs:

A mandated digital record of a building's data throughout its lifecycle.



Competence assurance:

A statutory foundation for competence frameworks, including the **8670 series of standards**.



Robust enforcement:

Comprehensive powers for the Regulator (BSR) to demand information, issue sanctions, and pursue legal action.

The BSA and its secondary legislation establish the statutory baseline for all industry stakeholders and provide mechanisms for regulatory enforcement. However, the BSA and associated secondary legislation do not prescribe how organizations should implement management systems to achieve regulatory compliance. This distinction is critical: the BSA and associated secondary legislation establish the statutory duties (the 'what'), while voluntary frameworks like BS 99001 provide the organizational governance (the 'how') to meet those duties consistently.

The BSA and its secondary legislation do not cover certain areas of organizational governance that shape culture, such as the authority to pause work when a quality concern (which could lead to a compliance issue) arises. Like the 'stop work authority' in health and safety, this concept is implemented voluntarily by organizations through internal commitments and enforcement. This key aspect of voluntary internal organizational governance is addressed through BS 99001.

4. Understanding BS 99001: Enhancements beyond ISO 9001

While ISO 9001:2015 sets out a universally applicable framework for quality management, it is designed to be applied across all scales, economic sectors and diverse conditions. Its value lies in this broad applicability, but this also means it does not directly address the unique challenges of high-risk, project-based environments like construction.

Specifically, the universal ISO 9001 framework does not explicitly cover:

- The project-based nature of construction delivery.
- The technical and supply chain complexity of multi-tier contractual relationships.
- The need for rigorous design and lifecycle assurance from concept through to decommissioning.
- The stronger need for robust information management to meet statutory expectations like the golden thread for HRBs.
- The interplay between project quality governance and statutory dutyholder roles under The Building Regulations.



BS 99001 was created to address these points. It builds upon ISO 9001's core structure but layers in additional, construction-specific requirements and guidance notes that reflect the operational realities and regulatory context of the UK built environment.

Key enhancements in BS 99001 are outlined below. The clause numbering corresponds to ISO 9001, and the full text of all requirements is available via BSI publications.

Note: BS 99001 refers to a wider and more detailed set of PAS frameworks and supporting information, especially in relation to competence. BS 99001 does not replace these frameworks but rather supports them.

4.1 Leadership and governance – Clause 5.3

Additional BS 99001 requirement: Top management shall ensure that a competent person is appointed as the management representative with responsibility and authority for oversight of quality across the organization's construction activities.



Why it matters: This requirement is absent from ISO 9001, which allowed the responsibility for quality to be dispersed. BS 99001 mandates an internal oversight role with clear authority, mirroring The Building Regulations 2010 (as amended) approach to clearly defined dutyholders and ensuring a visible escalation route for quality concerns.

4.2 Project risk and opportunity planning – Clause 6.1.1

Additional BS 99001 requirement: Planning must explicitly address project-specific risks and opportunities, considering asset type, complexity, regulatory requirements, and lifecycle performance expectations.

Why it matters: While ISO 9001 addresses risk at an organizational level, BS 99001 requires that this thinking be applied at the project level, recognizing that in construction, the project is the operational reality. It requires organizations to conduct project-specific quality risk assessments and monitoring, moving beyond generic company-wide KPIs. This approach aligns directly with the risk-based logic of the HRB Gateway process and the obligations of Building Regulations dutyholders.

4.3 Design and lifecycle assurance – Clause 8.3

Additional BS 99001 requirement: The design process must incorporate verification and validation activities to demonstrate compliance with statutory and client requirements across the asset lifecycle.

Why it matters: ISO 9001's design requirements are generic. BS 99001 demands lifecycle thinking, ensuring quality planning extends into operation, maintenance, and eventual decommissioning. This directly supports the principles of the golden thread for HRBs and the need for robust information for higher-risk building oversight.

4.4 Control of complex supply chains – Clause 8.4

Additional BS 99001 requirement: Organizations must evaluate, select, monitor, and re-evaluate suppliers and subcontractors based on their capability to deliver in accordance with statutory, client, and organizational quality requirements, including evidence of competence and regulatory compliance.

Why it matters: While ISO 9001 requires supplier control, BS 99001 explicitly integrates competence and regulatory assurance into the procurement process. In a sector defined by multi-tier subcontracting, this strengthens the client-principal contractor-supplier assurance chain.

4.5 Evaluation of performance against asset outcomes – Clause 9.1.3

Additional BS 99001 requirement: Organizations must assess and evaluate the quality of outputs against defined asset performance and compliance criteria, not just against customer satisfaction metrics.

Why it matters: ISO 9001 often frames performance in terms of process efficiency and customer perception. BS 99001 grounds evaluation in technical performance and compliance outcomes, providing the tangible evidence needed for HRB Gateway approvals and ongoing regulatory oversight. The built asset needs to work as designed, not merely have been built as designed.

Summary: How BS 99001 operationalizes key principles

By embedding these enhancements, BS 99001 transforms the ISO 9001 framework into a sector-specific management system standard that speaks directly to the realities of construction. It operationalizes:

- **Defined accountability:** Mirroring statutory dutyholder models.
- **Project-specific governance:** Managing unique risks, design complexity, and lifecycle outcomes.
- **Regulatory alignment:** Integrating competence, documentation, and verification controls compatible with BSA and secondary legislation requirements.
- **Assurance in the supply chain:** Strengthening oversight beyond contractual compliance to include statutory and competence considerations.

It's important to note that the effectiveness of a BS 99001 Quality Management System and the quality of its specific outputs largely depend on the depth of its implementation by the organization and the rigorousness of third party auditing.

5. Alignment and synergies between the BSA and BS 99001 requirements

This section maps the core operational and governance duties of the Building Safety Act to the corresponding clauses within BS 99001. The standard provides a structured, auditable management system that turns the intent of the BSA into repeatable processes for a construction organization.

Implementing BS 99001 does not automatically ensure legal compliance. But it does give organizations a strong framework to demonstrate and evidence that they are meeting their statutory, regulatory, and other obligations.

5.1 BSA Section 34 – Dutyholders and their duties

BSA requirement (paraphrased): Building regulations may, for the purpose of securing the safety of people in or about buildings, impose duties on relevant persons in connection with the planning or management of the work; and require relevant persons to co-operate with each other.

BS 99001 alignment and supporting analysis:

This statutory duty is supported by a multi-layered approach within BS 99001, primarily through **Clause 5.3 (Organizational Roles, Responsibilities and Authorities)**, **Clause 5.1.1 (Leadership and Commitment)**, and **Clause 8.1 (Operational Planning and Control)**.

BS 99001 operationalizes the dutyholder concept through its structured management system requirements. The leadership clauses (5.1.1) require top management to integrate quality management, including requirements such as BSA and associated secondary legislation duties, into the organization's core business processes. This prevents statutory, regulatory, and other obligations from becoming isolated compliance activities. Instead, they are embedded into project decision-making at the highest level.

The additional requirement in Clause 5.3 for a competent management representative is particularly significant. It turns the statutory concept of a 'dutyholder' into a tangible, operational role with explicit authority within the organization's governance structure.





Furthermore, Clause 8.1 directly underpins the BSA duty related to the ‘planning or management of the work’ by requiring the organization to systematically plan, implement, and control the processes needed for its construction activities. In conclusion, while the BSA and associated secondary legislation sets out who must be accountable, these clauses in BS 99001 set out how this accountability can be structured, maintained, and embedded within a systematic and auditable framework.

5.2 BSA Section 35: Competence

BSA requirement (paraphrased): Building regulations may impose competence requirements on any person in relation to design or building work. These requirements may relate to the skills, knowledge, experience, and behaviours of an individual.

BS 99001 alignment & supporting analysis: The BSA sets the legal expectation for competence; BS 99001, through clauses like 7.2 (Competence) and 8.4.1 (Control of Externally Provided Processes), provides the systematic method to achieve and evidence it.

The standard turns this broad statutory requirement into a structured and auditable process by ensuring that competence is:

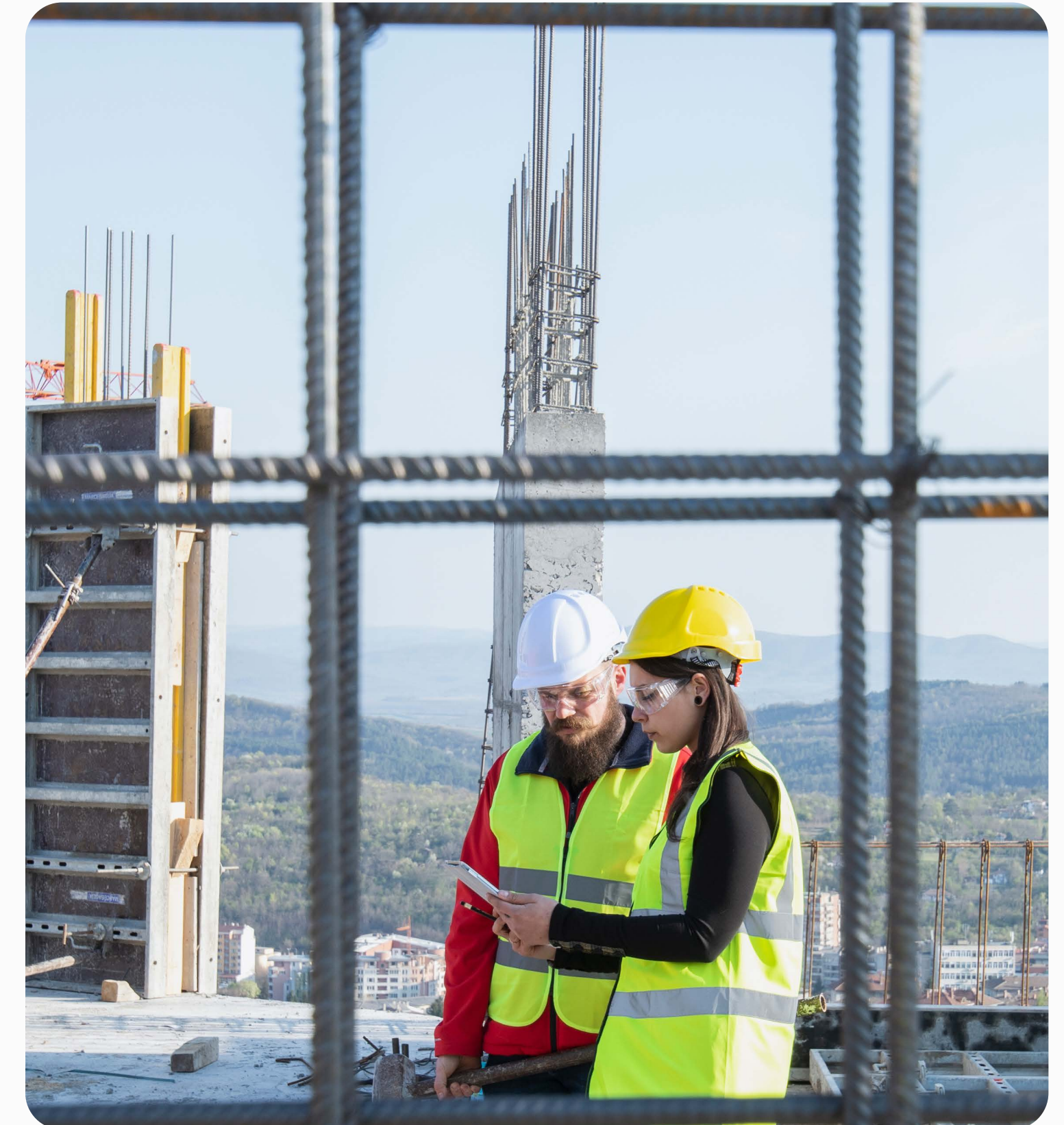
- **Defined:** BS 99001 requires organizations to explicitly determine the necessary competence criteria for all roles affecting building performance and compliance.
- **Assessed holistically:** The definition mirrors the BSA’s scope, covering education, training, skills, experience, and behaviours, ensuring it is not treated as a narrow checklist of qualifications.
- **Evidenced:** The standard mandates that ‘documented information’ be maintained as proof of competence, creating a clear audit trail that can be presented to the Building Safety Regulator.
- **Maintained through the supply chain:** BS 99001 strengthens the BSA and associated secondary legislation’s reach by embedding competence checks into procurement and subcontractor management via Clause 8.4.1, ensuring externally provided services meet the same standards.

5.3 BSA Section 88: Golden thread of information

BSA requirement (paraphrased): A relevant person must keep prescribed information about a higher-risk building, ensuring 'an accurate and up-to-date record of the building, its design, construction and ongoing maintenance' is kept in a prescribed form and manner.

BS 99001 alignment and supporting analysis: BSA Section 88 establishes the 'why' of the golden thread; BS 99001 sets out the 'how' through clauses such as: 7.5 (Documented Information), 8.3 (Design and Development), and 8.6 (Release of Products and Services). It operationalizes this requirement through a layered approach, enabling organizations to:

- **Structure and safeguard information:** Clause 7.5 requires that all documentation needed for proof of conformity is established, maintained, and controlled, ensuring golden thread information is accessible, accurate, and protected.
- **Integrate information from the start:** The enhanced design clause (8.3) requires that design outputs include all necessary information for safe construction and operation, pre-empting common gaps in the golden thread.
- **Verify before transfer:** Clause 8.6 formalizes the verification of information before release at key project milestones, ensuring the accuracy and completeness of the golden thread package.
- **Control supply chain data:** The standard requires control and verification of externally provided information, addressing the risk of inconsistent data from multiple subcontractors.



5.4 Compliance with construction stop/go points (Gateways 2 and 3)

Statutory requirement (Regulation 4, 12, & 42): The Building Safety Act 2022 (BSA) establishes mandatory control points (often referred to as ‘Gateways’ in BSR guidance) that must be passed for Higher-Risk Buildings (HRBs):

- **Before Commencement:** HRB work may not be commenced unless the Building Safety Regulator (BSR) has granted Building Control Approval. (See: The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023, Regulation 4(1) & Regulation 12(1)).
- **Before Occupation:** An HRB may not be occupied unless the BSR has issued a Completion Certificate. (See: The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023, Regulation 42).

BS 99001 Alignment and Supporting Analysis:

The ISO 9001 framework, enhanced by BS 99001, provides the necessary operational and documentary discipline to clear these statutory requirements. Organizations implementing the standard gain a structured assurance pathway by focusing on:

Supporting Gateway 2: (Building Control Approval Application): Clause 8.3 (Design & Development) ensures

that design inputs (including all regulatory and safety requirements) are systematically translated into verified design outputs before works commence. This directly supports the duty to provide the BSR with full, verified design documentation for approval.

Supporting Gateway 3: (Completion Certificate Application): Clause 8.6 (Release of Products and Services) directly supports the final handover by requiring verification that all product and service requirements have been met. This includes verifying that as-built information, O&M manuals, and safety case documentation are complete and accurate. Furthermore, Clause 9.1.3 (Evaluation of Performance Against Asset Outcomes) requires evaluation of the completed asset against defined outcomes, directly supporting the BSR’s final review.

***Note:** BS 99001 does not automatically guarantee that the adopting organization will clear the BSR’s reviews. Rather, it sets out the necessary quality management principles that enable the organization to be best prepared for HRB reviews by embedding discipline and verification throughout the project lifecycle.*

5.5 BSA Section 99: Enforcement powers and compliance obligations

BSA requirement (paraphrased): The regulator may, by notice, require a relevant person to provide such documents or information as the regulator may reasonably require. A person who without reasonable excuse fails to comply with a notice commits an offence.

BS 99001 alignment and supporting analysis: Section 99 empowers the BSR to demand evidence at any stage. BS 99001 equips organizations with the processes necessary to meet these demands efficiently. Clauses such as 9.1 (Monitoring & Measurement), 9.2 (Internal Audit), and 10.2 (Nonconformity and Corrective Action) provide a ready-made enforcement readiness framework.

This is achieved through:

- **Systematic evidence collection:** Clause 9.1 ensures that all relevant performance data (inspection results, compliance checks) is collected systematically, enabling an organization to produce factual evidence for the BSR.
- **An audit trail for confidence:** Clause 9.2 mandates internal audits, which can be scoped to include Building Regulations-specific obligations. These audit records provide a verifiable chain of evidence for regulator inspection.
- **Proactive deficiency management:** Clause 10.2 ensures that any identified nonconformities are formally investigated and corrected, demonstrating a commitment to continual improvement rather than reactive compliance.

Ultimately, BS 99001 embeds enforcement readiness into day-to-day operations rather than treating it as a crisis response.

6. Case insight and hypothetical application scenarios

This section moves from the what of the BSA and BS 99001 to the how and why, first with real-world examples from early adopters and then with practical scenarios to show the standard's impact on key project stakeholders.

6.1 Early adopter case studies

The commitment to a higher standard of quality management is being demonstrated by industry leaders. The certification of major contractors sends a clear signal that BS 99001 is becoming a key benchmark for excellence and regulatory preparedness.

6.1.1 VolkerWessels UK

VolkerWessels UK achieved certification to BS 99001 in 2023, becoming one of the first adopters of this sector-specific quality management standard.

Adrian Shah-Cundy, Group Health, Safety and Quality Director, noted:

“The process of review against BS 99001 to demonstrate compliance with its requirements forms a key element of our quality management strategy; BSI’s assessment has provided deeper insight into our processes relating to our construction activities.”

This certification demonstrates a clear organizational commitment to strengthening governance over design, supply chain quality, and lifecycle assurance, all of which are critical to BSA compliance and provide competitive differentiation.

6.1.2 Morgan Sindall Construction

In August 2025, Morgan Sindall Construction also achieved certification, underscoring its leadership in adopting best practice.

Steffan Speer, Technical Director for Morgan Sindall Construction, commented:

“This recognizes the work our teams do to ensure compliance to standards and implementing building safety management processes that provide a golden thread of information across all our projects.”

Matt Page, Senior Vice President at BSI, noted that the achievement reflects a **“proactive commitment to delivering projects that are of high quality and aligned with the evolving expectations of clients, regulators, and communities.”**

6.1.3 Laing O’Rourke

In September 2025, Laing O’Rourke publicized that they became the first company in the UK to achieve group-wide certification to the sector-specific quality management standard, BS 99001:2022, across all its UK entities. This comprehensive certification demonstrates a commitment to embedding a culture of quality throughout the project lifecycle, from design and procurement through to construction and handover.

Peter Lyons, Managing Director, Europe, noted that this achievement is a:

“Testament to the dedication of our teams to injecting quality into every step of the construction process.”

BSI’s **Matt Page** praised the certification as setting a **“new benchmark for tier one contractors”** by integrating requirements for competence, design control, and traceability, directly supporting the evolving demands for safer buildings and robust regulatory compliance.



6.2 Hypothetical scenarios: From pitfalls to best practice

The following scenarios illustrate how implementing BS 99001 can mitigate common project pitfalls, moving teams from a reactive to a proactive quality culture.

6.2.1 The Client/Developer

- **A common pitfall:** A higher-risk residential project is weeks from practical completion. During the assembly of the HRB Gateway 3 submission pack, the Principal Contractor discovers that as-built records for fire-stopping penetrations from a key subcontractor are incomplete. The subcontractor has since left the project. Occupation is delayed by two months while costly, intrusive surveys are conducted, resulting in significant loss of rental income and reputational damage.
- **The BS 99001 solution:** A client conforming to BS 99001 would have used Clause 8.4 (Control of Externally Provided Processes) to ensure that procurement contracts included specific, non-negotiable requirements for progressive handover of quality assurance records. Their own internal processes, guided by Clause 9.1 (Monitoring and Measurement), would involve scheduled audits to verify that this evidence was being collected in real-time.
- **The tangible outcome:** The HRB Gateway 3 submission pack is assembled smoothly from progressively assured information. The project achieves its completion certificate on schedule, enabling timely occupation and revenue generation. The client possesses a robust, auditable golden thread from day one, reducing their lifecycle risk.

6.2.2 The Designer

- **A common pitfall:** To accelerate the programme, a late-stage design change is issued informally. The updated architectural drawing has not been formally communicated to the structural engineer. The change creates a clash with a reinforced concrete beam, which is only discovered on-site after the concrete has been poured, leading to a significant delay and costly remedial work.
- **The BS 99001 solution:** A design practice conforming to BS 99001 would have a mandatory process for design change management under Clause 8.3 (Design and Development). The process would require all proposed changes to be formally reviewed for impact by all relevant disciplines before being approved and issued. Clause 7.5 (Documented Information) would ensure this change is fully traceable.
- **The tangible outcome:** The risk of interdisciplinary clashes is drastically reduced. Design outputs are more reliable, leading to fewer on-site delays and less costly rework. The designer can provide the client and Principal Contractor with clear evidence of a controlled, compliant design process.

6.2.3 The Principal Contractor

- **A common pitfall:** A specialist facade subcontractor is appointed based primarily on the lowest cost. A site audit halfway through their work reveals that the specific on-site installation teams lack the product-specific training mandated by the facade system's manufacturer. All work is stopped, and a section of the installed facade must be removed for inspection, causing a four-week programme delay.
- **The BS 99001 solution:** A Principal Contractor conforming to BS 99001 would use Clause 7.2 (Competence) and Clause 8.4 (Control of Externally Provided Processes) as a framework for supply chain assurance. Their due diligence would go beyond corporate certificates to verify the competence management system of the subcontractor, including the training records for the specific individuals who will be working on the project.
- **The tangible outcome:** The risk of installation and latent defects is significantly mitigated. The PC has higher confidence in their supply chain's ability to 'get it right first time,' leading to a smoother programme and a stronger evidence base for their own dutyholder responsibilities under the Building Regulations 2010 (as amended).

6.3 Conclusion: A shift in approach

These scenarios illustrate how BS 99001 provides a structured framework for managing risk and embedding a proactive culture of quality. By translating the principles of the BSA and its associated secondary legislation into clear, project-level controls, it helps all stakeholders move away from costly, reactive problem-solving to a more predictable and assured approach of delivering safer, higher-quality built assets.



7. Barriers and enablers to the adoption of BS 99001

The successful adoption of BS 99001 across the UK construction sector is not automatic. Organizations faces practical challenges —such as process integration and resource allocation — as well as cultural hurdles, including ownership of safety outcomes and accountability. However, each challenge also presents an opportunity for the industry to drive meaningful change. Achieving widespread uptake will require strong leadership, a clear understanding of the standard’s value, and a robust, auditable assurance framework.



7.1 Key challenges and opportunities

The primary barriers to adoption can be reframed as the industry's greatest opportunities for improvement.

Opportunity 1

Raising awareness and demonstrating value

 **The challenge:** Awareness of BS 99001 and its direct benefits for BSA and secondary legislation compliance is still developing, particularly within the SME supply chain.

 **The opportunity:** This presents a clear opportunity for clients, principal contractors, and industry bodies to lead. By providing clear guidance, case studies, and training, they can demonstrate that BS 99001 is not an abstract 'extra layer' but a vital tool for risk management and regulatory readiness.

Opportunity 2

Clarifying the value proposition beyond ISO 9001

 **The challenge:** Organizations already certified to ISO 9001 may perceive BS 99001 as duplicative, underestimating its specific enhancements.

 **The opportunity:** To communicate that BS 99001 is a targeted **enhancement**, not a replacement. It builds on the strong foundation of ISO 9001 to address the unique project-based realities of construction—such as design quality, competence management, and lifecycle assurance—that the generic standard does not explicitly cover.

Opportunity 3

Viewing investment as risk mitigation

 **The challenge:** The initial effort and cost required to update management systems and engage certification bodies can be perceived as prohibitive.

 **The opportunity:** To reframe this cost as a strategic investment. The scenarios in Section 6 illustrate how this upfront investment helps mitigate the far greater downstream financial and reputational risks of project delays, rework, regulatory intervention, and latent defects.

Opportunity 4

Realigning commercial incentives with quality outcomes

 **The challenge:** In a price-driven tendering environment, the maturity of a supplier's quality management system is often undervalued compared to cost.

 **The opportunity:** For clients and procurement leaders to evolve their evaluation models to give greater weight to auditable quality assurance. BS 99001 certification can be used as a key indicator of a supplier's capability to deliver a safe, compliant, and high-quality asset, justifying a shift away from a lowest-cost-wins mentality.

7.2 Strategic enablers for widespread adoption

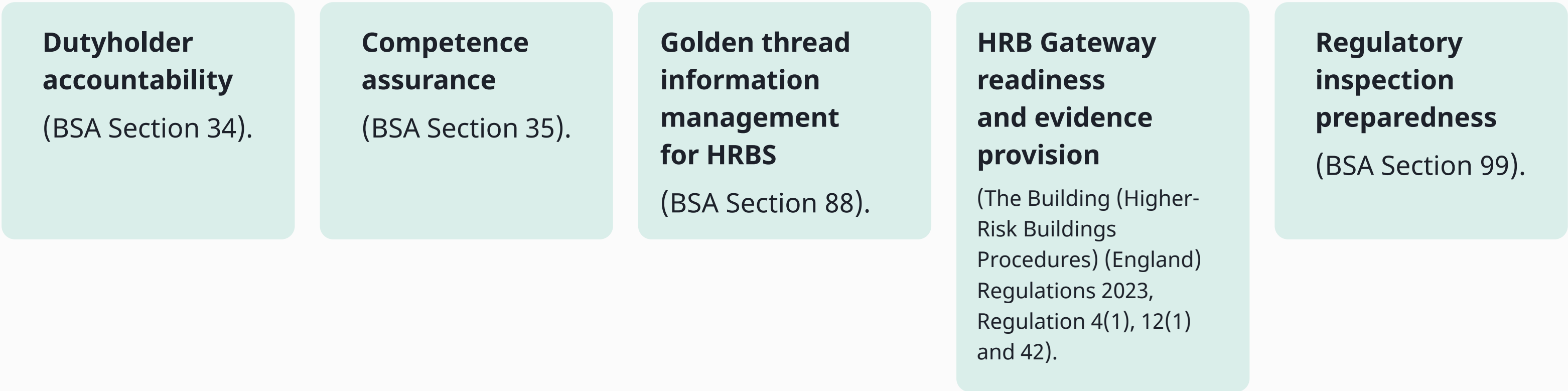
- **Client-led procurement:** This is the most powerful enabler. When major public and private sector clients specify BS 99001 certification or conformance in their pre-qualification and tender evaluations, it creates a cascade effect, driving adoption and uplifting quality throughout the entire supply chain.
- **Clear links to BSA and secondary legislation compliance strategy:** Positioning BS 99001 as a practical toolkit for de-risking projects is a critical enabler. It provides a structured way to generate the evidence needed for HRB Gateway submissions and to demonstrate the effective management of Building Regulations dutyholder responsibilities for competence and the golden thread for HRBs.
- **A robust and trusted certification scheme:** The credibility of third-party certification is paramount. This will be enabled by:
 - **The planned UKAS pilot scheme,** which will provide confidence in the quality and impartiality of accredited certification.
- **Enhanced auditor competence.** The scheme's success will depend on competent auditors with specific knowledge of the built environment sector, who can build trust and provide genuine insight during the audit process.
- **Certification bodies as partners in adoption:** Experienced Certification Bodies are more than just assessors; they are key enablers. They can help overcome the awareness challenge by providing industry-wide training, sharing best practice, and conducting value-adding audits that help organizations improve their processes, not just check boxes.
- **A cultural shift towards accountability:** The Hackitt Review identified a lack of ownership for safety outcomes. BS 99001 directly addresses this by fostering documented governance, defined responsibilities, and auditable processes, providing a mechanism to drive the necessary cultural shift towards demonstrable accountability.



8. Conclusions and strategic recommendations

The Building Safety Act and its associated secondary legislation have established the statutory baseline for quality, safety, and accountability in the UK built environment. Legislation alone, however, provides the ‘what’, not the ‘how’. BS 99001 enables organizations to embed the operational discipline, lifecycle focus, and cultural change needed to deliver on the Act’s ambition. The standard **helps to fill the role** of a unifying, industry-led mechanism that translates legal duties into repeatable, auditable, and demonstrably effective management system practices.

When implemented rigorously, BS 99001 provides a structured route to operationalizing key areas of the BSA and associated secondary legislation, particularly:



However, achieving these outcomes depends on all industry stakeholders playing their part. Success requires commitment from organizations, strong demand from clients, and robust, independent verification by a community of impartial, competent certification bodies with deep knowledge of the built environment.

Looking ahead

The upcoming 2026 revision of ISO 9001 and the likely update to BS 99001 present a critical opportunity for the UK construction sector. By incorporating lessons from early adopters and aligning closely with the evolving regulatory landscape, BS 99001 can strengthen its role as the leading framework for quality management in the built environment.

The Hackitt Review warned of systemic failings and made clear that the industry must take ownership of building safety outcomes. When used as a common standard, BS 99001 provides a practical pathway for organizations to go further than compliance, embedding accountability and improving trust to achieve excellence.

Call to action

Coordinated adoption of BS 99001 will help organizations to bridge the gap between law and practice, ensuring the aims of the BSA are matched by the operational capability to deliver safe, high-quality buildings.

Appendix A:

Comparative table – ISO 9001 vs. BS 99001 additional requirements

ISO 9001 clause	BS 99001 additional requirement / guidance	Relevance to construction
5.3 Organizational roles, responsibilities, and authorities	Additional requirement: Appoint a competent person as the management representative with authority for quality oversight.	Establishes a single point of accountability for quality, mirroring the Building Regulations dutyholder model.
6.1.1 Actions to address risks and opportunities	Additional requirement: Planning must address “project-specific risks and opportunities” and lifecycle performance.	Embeds risk management at the project level, aligning with HRB Gateway assurance.
8.3 Design and development of products and services	Additional requirement: The design process must incorporate verification and validation to demonstrate compliance across the asset lifecycle.	Extends design assurance across the asset lifecycle to support the golden thread for HRBs.
8.4 Control of externally provided processes, products, and services	Additional requirement: Evaluate suppliers based on their capability to deliver in accordance with statutory and quality requirements, including competence.	Integrates competence assurance into supply chain management.
9.1.3 Analysis and evaluation	Additional requirement: Evaluate the quality of outputs against “defined asset performance and compliance criteria.”	Focuses evaluation on tangible asset performance and compliance outcomes for regulators.
7.5 Documented information	Guidance note: Clarifies that documentation must support statutory requirements and lifecycle asset information needs.	Directly supports the creation and control of golden thread information for HRBs.
7.2 Competence	Guidance note: Specifies that competence requirements should reflect statutory definitions (e.g., 8670 series).	Aligns organizational competence frameworks with regulatory expectations.

Appendix B:

Mapping of Building Safety Act 2022 duties to BS 99001 requirements

Duties under the BSA and Supporting Regulations	Core Legal Duty (Summarized)	Relevant BS 99001 clause(s)	How BS 99001 operationalizes the duty
Section 34 – Dutyholder accountability	Impose duties on relevant persons in connection with the planning or management of the work.	5.1.1, 5.3, 8.1	Assigns a formal ‘dutyholder’ role (Management Rep) and embeds statutory duties into leadership and operational planning.
Section 35 – Competence	Impose competence requirements... relating to the skills, knowledge, experience and behaviours of an individual.	7.2, 8.4	Requires the systematic determination, assessment, and documentation of competence for all personnel, including the supply chain.
Section 88 – Golden thread of information	Ensuring an accurate and up-to-date record of the building, its design, construction and ongoing maintenance.	7.5, 8.3, 8.6	Provides a framework to control, verify, and manage documented information throughout the asset lifecycle.
The Building (Higher-Risk Buildings Procedures) (England) Regulations 2023, Regulation 4(1), 12(1) and 42	The regulator must be satisfied that the building work complies with all applicable requirements before it is occupied.	8.3, 8.6, 9.1.3, 9.2	Embeds structured verification points for design (HRB Gateway 2) and as-built completion (HRB Gateway 3) to provide assurance.
Section 99 – Enforcement readiness	The regulator may by notice require a relevant person to provide such documents or information as the regulator may reasonably require.	7.5, 9.1, 9.2, 9.3, 10.2	Creates an ‘enforcement-ready’ state through systematic monitoring, internal audits, and controlled, retrievable records.

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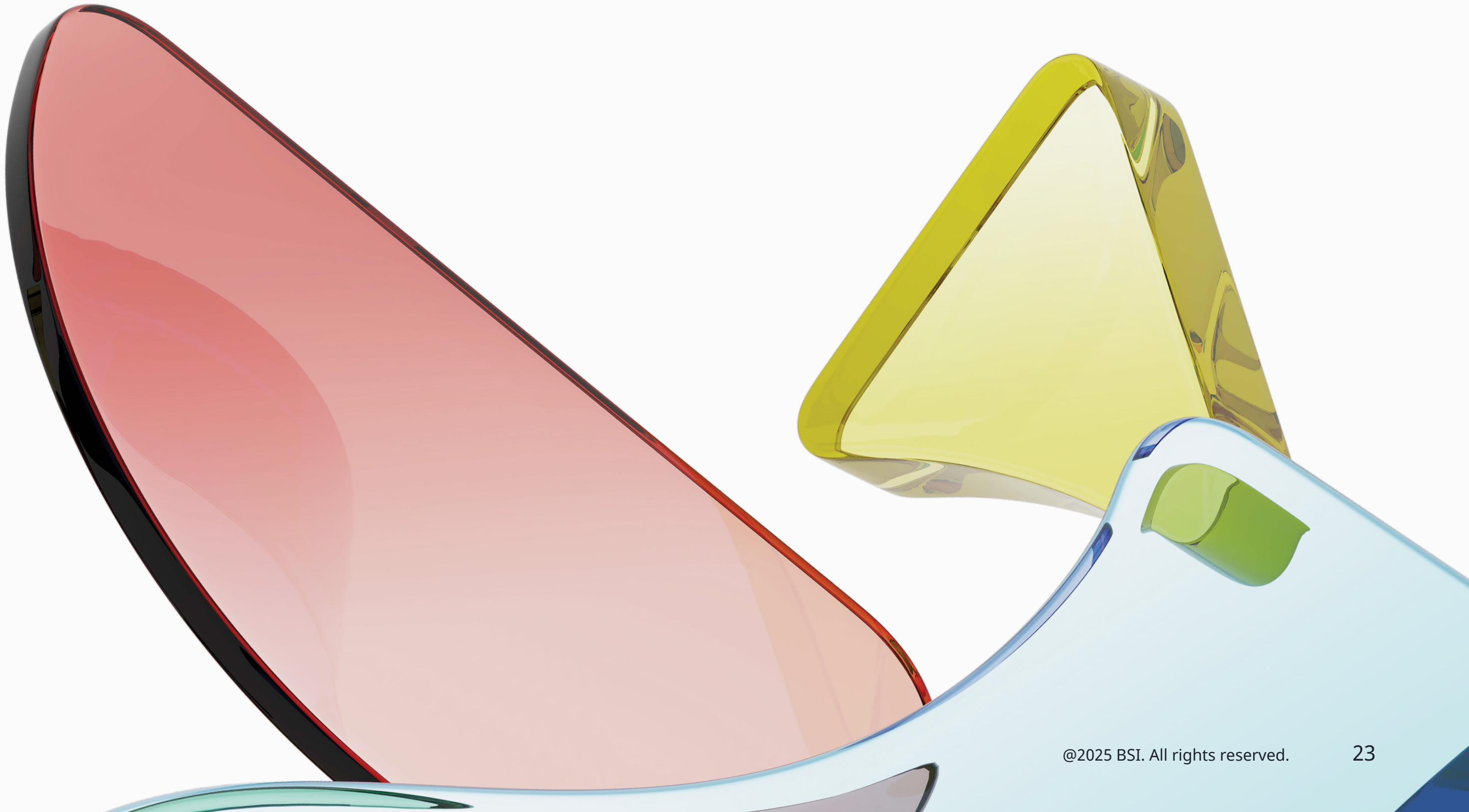
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