

R&M POLICY · HEALTH AND SAFETY

Competency Management Procedure

R&M Property Group Ltd

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Approved by	Thom McKenna, Director
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1. Purpose

R&M Property Group Ltd recognises that competent people are essential to delivering safe, high-quality construction projects. The Building Safety Act 2022 places a statutory duty on all duty holders to ensure that the people they appoint or engage are competent, and that competence is assessed, maintained, and evidenced throughout the lifecycle of a project.

This procedure sets out how R&M manages and records evidence of competency - defined as the combination of Skills, Knowledge, Experience and Behaviours (SKEB) - for our directly employed workforce, agency workers, and key sub-contractor roles. It ensures that every person working on our projects has the right competencies for the tasks they are carrying out, and that those competencies are verified before work begins and maintained throughout their engagement.

2. Scope

This procedure applies to:

- All directly employed R&M staff, including office-based and site-based personnel.
- Agency and temporary workers engaged through labour supply agencies.
- Sub-contractor personnel in key roles - supervisors, operatives carrying out safety-critical work, and anyone appointed to discharge a specific duty under the Building Safety Act, CDM Regulations, or other statutory requirement.
- Consultants and designers appointed by R&M where competence verification is required under CDM 2015 or Building Regulations.

It covers all projects undertaken by R&M, including those procured through public and private sector frameworks.

3. Competency Framework - SKEB

R&M adopts the industry-standard SKEB framework to define and assess competence. This aligns with the competence requirements set out in PAS 8671 (Built environment - Framework for competence of individual Principal Designers), PAS 8672 (Built environment - Framework for competence of individual Principal Contractors), and BSI Flex 8670 (Built environment - Core criteria for building safety in competence frameworks). Each element is defined as follows:

3.1 Skills

The practical abilities required to carry out a task safely and to the required standard. Skills are typically demonstrated through qualifications, trade certifications, card scheme registrations, and observed workplace performance. Examples include bricklaying to specified tolerances, scaffold erection to TG20/NASC standards, fire door installation to manufacturer instructions and third-party certification requirements, and operation of plant and equipment.

3.2 Knowledge

The theoretical understanding needed to perform a role. Knowledge includes awareness of relevant legislation, regulations, codes of practice, British Standards, and manufacturer guidance. It extends to understanding the consequences of non-compliance and the ability to recognise when work is not being carried out correctly. Knowledge is evidenced through qualifications, training records, test results, and professional memberships.

3.3 Experience

The track record of applying skills and knowledge in real-world construction environments. Experience is assessed through employment history, project references, site-specific induction performance, and observed work quality during the early stages of engagement. R&M recognises that experience alone does not equate to competence - it must be combined with current skills and knowledge.

3.4 Behaviours

The attitudes and working practices that support safe and quality-focused delivery. Behaviours include willingness to follow procedures, proactive identification and reporting of hazards and defects, respect for hold points and inspection requirements, acceptance of challenge and correction, commitment to continuous improvement, and positive engagement with the safety observation and near-miss reporting programmes set out in R&M's Behavioural Safety Programme. Behaviours are assessed through workplace observation, safety observation records, toolbox talk attendance, and disciplinary and commendation records.

4. Roles and Responsibilities

4.1 Board of Directors

- Ensure that adequate resources are allocated to competency management across the business.
- Review competency management performance at quarterly management reviews.
- Approve this procedure and any material changes to it.

4.2 Thom McKenna, Director

- Overall accountability for competency management as part of the company's quality and safety management systems.
- Approve annual training plans and budgets.
- Sign off competency requirements for senior appointments.

4.3 Frans Coetzee, Quality Manager

- Maintain the company competency matrix and role profiles.
- Coordinate annual training needs analysis.
- Audit competency records across projects on a quarterly basis.
- Report competency management performance data to the board.

4.4 Phillip Hollingworth, H&S Adviser (Spectra Safety)

- Manage the central training and competency database.
- Track qualification expiry dates and issue renewal reminders.
- Deliver and coordinate statutory and mandatory training programmes.

- Verify competency documentation for directly employed staff and agency workers.

4.5 Site Managers

- Verify that all personnel on site hold valid competency evidence before allowing them to commence work.
- Conduct and record site-specific inductions covering project hazards, procedures, and quality requirements.
- Monitor workforce behaviours through the safety observation programme and report concerns.
- Refuse entry to any person who cannot demonstrate the required competence for their role.

4.6 Louis Howard, Procurement Manager (Enabl)

- Verify sub-contractor competency evidence as part of the pre-qualification and selection process.
- Include competency requirements in all sub-contract enquiries and orders.
- Monitor sub-contractor compliance with competency requirements during the contract period.

4.7 Sub-Contractors

- Provide competency evidence for all personnel they propose to deploy on R&M projects.
- Ensure that their workforce holds valid card scheme registrations and qualifications appropriate to the work.
- Notify R&M immediately if any operative's competency status changes - for example, card expiry, licence suspension, or health condition affecting fitness to work.
- Maintain their own competency management records and make them available for audit.

5. Competency Requirements by Role Category

R&M maintains a competency matrix that defines the minimum SKEB requirements for each role category. The matrix is reviewed annually and updated when roles change, new legislation is introduced, or new work types are undertaken. The key requirements by role category are:

5.1 Site Manager / Project Manager

- SMSTS or equivalent; relevant degree or NVQ Level 6; CSCS Black Manager card; first aid at work; minimum 5 years' experience managing similar projects; fire safety awareness; Building Safety Act awareness.
- Verified by: certificate check, interview, reference check, CPD log review.

5.2 Site Supervisor

- SSSTS or equivalent; NVQ Level 3/4 in relevant discipline; CSCS Gold Supervisor card; first aid at work; temporary works awareness; minimum 3 years' supervisory experience.
- Verified by: certificate check, interview, observed performance.

5.3 Skilled Operative

- NVQ Level 2/3 in relevant trade; CSCS Blue Skilled Worker card or equivalent industry card (JIB, CISRS, CPCS, IPAF); trade-specific training as required; manufacturer training for proprietary systems.

- Verified by: card check, certificate check, practical assessment where required.

5.4 General Operative

- CSCS Green Labourer card (minimum); CITB Health, Safety and Environment test; manual handling training; task-specific training for assigned duties.
- Verified by: card check, induction assessment, supervised work period.

5.5 Plant Operator

- CPCS or NPORS card for specific plant categories; medical fitness certificate; familiarisation on specific machine type; minimum experience requirements per plant category.
- Verified by: card check, medical certificate, familiarisation record, observed competence.

5.6 Temporary Works Coordinator

- CITB TWC training; relevant engineering qualification or equivalent experience; CSCS appropriate card; understanding of BS 5975.
- Verified by: certificate check, interview, CPD log.

5.7 Fire Stopping Installer

- Third-party certification (e.g. FIRAS, IFC); manufacturer-specific product training for each system installed; NVQ Level 2 in passive fire protection; CSCS card.
- Verified by: certification check, manufacturer training certificates, installation audit.

5.8 Designer / Principal Designer

- Relevant professional qualification (RIBA, ICE, IStructE, CIBSE or equivalent); professional body membership; CDM competence; Building Safety Act awareness; PAS 8671 alignment; relevant sector experience.
- Verified by: qualification check, professional registration, project portfolio review, interview.

The full competency matrix includes additional role categories and more granular requirements. It is held by the Compliance Officer and reviewed annually.

6. Competency Verification Process

6.1 Pre-Employment and Pre-Engagement Checks

Before any person commences work for R&M - whether as a direct employee, agency worker, or sub-contractor operative - the following competency checks are completed:

- **Card scheme verification:** Valid CSCS, CPCS, IPAF, JIB, CISRS, or other relevant industry card checked in person on site. Card must be in date, display the correct photograph, and correspond to the role being undertaken. Online verification is used where card schemes provide it.
- **Qualification and certification check:** Original certificates or verified copies of relevant qualifications, training certificates, and professional registrations are reviewed and recorded. For safety-critical roles (fire stopping, structural steelwork, gas installation, electrical work), third-party certification must be current and valid.

- **Experience assessment:** Employment history and project experience are reviewed through CV, references, or pre-qualification questionnaire. For sub-contractors, this forms part of the PQQ process set out in the Sub-Contractor Selection and Monitoring Policy.
- **Behavioural assessment:** For directly employed staff, behavioural competence is assessed through interview, probationary period observation, and line manager review. For sub-contractor operatives, behaviours are monitored from commencement through the safety observation programme.
- **Right to work verification:** Completed in accordance with R&M's Right to Work Verification Policy - confirms legal right to work in the UK before engagement begins.

6.2 Site-Specific Induction

Every person entering an R&M project site receives a site-specific induction before commencing work. The induction covers:

- Project overview, key personnel, and emergency procedures.
- Site-specific hazards and risk assessments relevant to their work area.
- Quality requirements, inspection and test plan hold points, and reporting procedures.
- Environmental controls and waste management requirements.
- Behavioural expectations - including the right to stop work, near-miss reporting, and the safety observation programme.
- Welfare facilities, access routes, and site rules.

Induction attendance is recorded with name, company, trade, card number, card expiry date, date of induction, and signature. Induction records are retained for the duration of the project plus six years.

6.3 Task-Specific Briefings

Before any operative begins a new task or activity, a task-specific briefing is delivered covering the relevant risk assessment, method statement, quality requirements, and any specific competency requirements for that task. The briefing confirms that the operative understands what is required and has the skills and training to carry out the work. Briefings are recorded and signed by both the person delivering the briefing and the operative.

6.4 Ongoing Competency Monitoring

Competency is not a one-off check. R&M monitors competence on an ongoing basis through:

- **Workplace observations:** Site managers and supervisors observe working practices daily. The safety observation programme set out in the Behavioural Safety Programme provides a structured framework for recording both positive and negative observations of competence and behaviour.
- **Inspection results:** Hold point inspection outcomes, non-conformance reports, and snagging records provide objective evidence of whether work is being completed to the required standard. Recurring quality issues attributed to specific operatives or trades trigger competency review.
- **Card expiry monitoring:** The Compliance Officer maintains a tracker of all card and certification expiry dates. Renewal reminders are issued 60 days before expiry. Any person whose card or certification expires is not permitted to continue in the relevant role until renewal is confirmed.
- **Behavioural monitoring:** Patterns of unsafe behaviour, repeated procedural non-compliance, or failure to engage with quality and safety processes are identified and

addressed through the behavioural safety programme, toolbox talks, and where necessary, formal performance management.

7. Sub-Contractor Competency Verification

Sub-contractor competency is verified at three stages:

7.1 Pre-Qualification

The Sub-Contractor Selection and Monitoring Policy sets out the pre-qualification questionnaire (PQQ) that every sub-contractor must complete before being added to the approved sub-contractor list. The competence assessment section of the PQQ requires evidence of:

- Company accreditations and certifications relevant to the work (SSIP, CSCS, trade-specific schemes).
- Training and development policy with evidence of implementation.
- Competency management arrangements for their own workforce.
- Qualification and card scheme records for key personnel (supervisors, safety-critical operatives).
- Track record of similar work - project references, client testimonials, portfolio of completed work.
- Third-party certifications where required - FIRAS for fire stopping, NICEIC/NAPIT for electrical, Gas Safe for gas installation, CISRS for scaffolding.

7.2 Pre-Start Verification

Before a sub-contractor's operatives commence work on any R&M project, the site manager verifies:

- Identity of all operatives matches the notified workforce list.
- Valid card scheme registrations for every operative - checked in person, card number and expiry recorded.
- Trade-specific qualifications and manufacturer training certificates for proprietary systems.
- Nominated supervisor holds appropriate supervisory qualifications (SSSTS minimum).
- Method statements and risk assessments demonstrate understanding of the work and competence to deliver it.

Any operative who cannot demonstrate the required competence at pre-start is refused entry to the site. The sub-contractor is notified and must provide a suitably competent replacement before work begins.

7.3 During the Works

Sub-contractor competency is monitored throughout the contract period through:

- Quality inspections and hold point sign-offs - work quality provides direct evidence of operative competence.
- Safety observations - sub-contractor personnel are included in the safety observation programme.
- Non-conformance tracking - NCR trends are analysed by sub-contractor and trade to identify competency-related issues.
- Workforce change notifications - sub-contractors must notify R&M before deploying any new operative and provide competency evidence before that person starts work.

- Performance scorecard - the quarterly sub-contractor performance review includes a competency and training dimension.

Where competency concerns are identified, R&M implements a graduated response: verbal warning, formal written notice requiring corrective action, enhanced monitoring, and ultimately suspension or removal from the approved sub-contractor list if concerns are not addressed.

8. Fire Safety and Structural Safety - Role Competency Requirements

The Building Safety Act 2022 places particular emphasis on competence in relation to fire safety and structural safety. R&M requires all sub-contractors and directly employed operatives working in fire safety or structural safety roles to hold specific, current qualifications and third-party certifications appropriate to their trade. The following sets out the minimum competency requirements by trade and how sub-contractors must evidence them.

8.1 Fire Safety Roles

Fire Stopping Installer

- Required certification: Third-party certification under an accredited scheme - FIRAS (Warrington Fire), IFC Certification, or equivalent UKAS-accredited scheme.
- Required training: Manufacturer-specific product training for every fire stopping system the operative will install (e.g. Hilti, Sika, Nullifire, Promat). Training must be current and system-specific - generic fire stopping training alone is not sufficient.
- Qualifications: NVQ Level 2 in Passive Fire Protection (or working towards with supervised installation only).
- Card scheme: CSCS card at appropriate level.
- Evidence required from sub-contractor: Copy of FIRAS/IFC certificate (company and individual), manufacturer training certificates for each product system, CSCS card details, and confirmation of which operatives are certified to install which systems.

Fire Door Installer

- Required certification: BM TRADA Q-Mark Fire Door Installation scheme, FIRAS fire door installation, or equivalent third-party certificated scheme.
- Required training: Manufacturer-specific training for each fire door system installed, covering hanging, hardware, glazing, intumescent seals, and signage.
- Qualifications: NVQ Level 2/3 in Wood Occupations or Architectural Joinery, or equivalent.
- Card scheme: CSCS Blue Skilled Worker card or JIB card.
- Evidence required from sub-contractor: Copy of Q-Mark or FIRAS certificate, manufacturer training records, CSCS/JIB card details, and evidence of annual refresher or CPD.

Fire Alarm and Detection Installer

- Required certification: Company must hold BAFE SP203-1 certification (design, installation, commissioning, and maintenance of fire detection and alarm systems).
- Required training: BS 5839-1 (fire detection and alarm systems) training. Operatives must be trained and assessed on the specific system being installed.
- Qualifications: FIA (Fire Industry Association) competency-assessed or equivalent.
- Card scheme: ECS (Electrotechnical Certification Scheme) card or CSCS card at appropriate level.

- Evidence required from sub-contractor: BAFE certificate, individual operative training records, ECS/CSCS card details.

Sprinkler System Installer

- Required certification: Company must hold LPCB (Loss Prevention Certification Board) approval or FIRAS sprinkler installation certification.
- Required training: Trained to BS 9251 (residential sprinkler systems) or BS EN 12845 (commercial/industrial sprinkler systems) as appropriate.
- Qualifications: Relevant plumbing or mechanical services qualification; LPC Rules training for designers.
- Card scheme: CSCS or JIB card at appropriate level.
- Evidence required from sub-contractor: LPCB or FIRAS certificate, operative training records and competence assessments, card details.

External Wall System Installer (Cladding, Rainscreen, ETICS)

- Required certification: Installer must be approved by the system manufacturer. Where available, third-party certification under schemes such as CWCT (Centre for Window and Cladding Technology) or INCA (Insulated Render and Cladding Association) membership.
- Required training: Manufacturer-specific system training covering the full build-up - substrate preparation, insulation, fixings, barriers, and rainscreen. Training must cover fire performance of the complete system, not just individual components.
- Qualifications: NVQ in relevant discipline; for curtain walling, CSCS Curtain Wall Installer card.
- Card scheme: CSCS card at appropriate level.
- Evidence required from sub-contractor: Manufacturer approval letter, system-specific training certificates, evidence of BS 8414/BR 135 awareness training where relevant, CSCS card details.

Compartmentation and Fire Barrier Installer

- Required certification: FIRAS or equivalent third-party certification for cavity barrier and fire barrier installation.
- Required training: Manufacturer-specific training for each barrier system installed. Awareness of BS EN 1366 (fire resistance tests for service installations) and the principles of compartmentation.
- Qualifications: NVQ Level 2 in relevant trade.
- Card scheme: CSCS card at appropriate level.
- Evidence required from sub-contractor: FIRAS certificate, manufacturer training certificates, CSCS card details.

8.2 Structural Safety Roles

Structural Steelwork Erector

- Required certification: Company must hold BCSA (British Constructional Steelwork Association) membership or RQSC (Register of Qualified Steelwork Contractors) registration at the appropriate category. CE/UKCA marking to BS EN 1090 for fabrication.
- Required training: Steel erection safety training (CISRS for scaffolding interfaces where applicable), safe slinging and lifting, torque-controlled bolting, and site welding where specified.
- Qualifications: NVQ Level 2/3 in Structural Steelwork.
- Card scheme: CSCS card at appropriate level; CISRS card for scaffolding-related steelwork.

- Evidence required from sub-contractor: BCSA/RQSC certificate, BS EN 1090 factory production control certificate, welder qualifications (BS EN ISO 9606-1), CSCS card details, lifting plan competencies.

Structural Concrete and Reinforcement Contractor

- Required certification: CARES (Certification Authority for Reinforcing Steels) approval for steel fixing. Company quality management system to BS EN 13670 (execution of concrete structures).
- Required training: Concrete technology training appropriate to the work (e.g. ICT/CONSTRUCT concrete practice courses), steel fixing to specification, post-tensioning where applicable.
- Qualifications: NVQ Level 2 in Formwork or Reinforcing Steelwork.
- Card scheme: CSCS Blue Skilled Worker card.
- Evidence required from sub-contractor: CARES approval certificate, operative NVQ/card details, concrete cube test records and mix design competence for specialist pours.

Structural Timber Frame Erector

- Required certification: STA (Structural Timber Association) membership and STA Assure accreditation (or equivalent quality assurance scheme).
- Required training: Manufacturer-specific training for the frame system, including connections, bracing, and fire protection requirements. Timber frame fire safety awareness.
- Qualifications: NVQ Level 2/3 in Timber Frame Erection or equivalent.
- Card scheme: CSCS card at appropriate level.
- Evidence required from sub-contractor: STA membership certificate, STA Assure accreditation (where applicable), manufacturer training records, CSCS card details, timber frame fire safety training evidence.

Piling and Foundation Contractor

- Required certification: FPS (Federation of Piling Specialists) membership at appropriate category.
- Required training: Piling rig operation (CPCS category), safe working near underground services, concrete technology for cast in-situ piles.
- Qualifications: CPCS Piling Rig Operator card for rig operators; engineering qualifications for designers and supervisors.
- Card scheme: CPCS card for plant operators; CSCS for supervisors and labourers.
- Evidence required from sub-contractor: FPS membership certificate, CPCS cards for all rig operators, supervisor qualifications, recent project references for similar pile types.

Temporary Works Designer and Coordinator

- Required certification: Temporary works to be designed by a chartered engineer (CEng) or equivalent with relevant temporary works experience.
- Required training: CITB Temporary Works Coordinator (TWC) training for coordinators; CITB Temporary Works Supervisor (TWS) training for site supervisors.
- Qualifications: Relevant engineering degree or equivalent for designers; TWC/TWS certificates for site roles.
- Card scheme: CSCS card at appropriate level.
- Evidence required from sub-contractor: TWC/TWS certificates, designer's professional qualifications and registration, evidence of BS 5975 competence, CSCS card details.

8.3 Verification and Record Keeping

For all fire safety and structural safety roles, R&M requires sub-contractors to submit competency evidence as part of the material approval and pre-start process - before any operative begins work. The site manager verifies:

- Third-party scheme certificates are current and cover the specific scope of work (not just the company - the individual operative where individual certification applies).
- Manufacturer training certificates match the specific products and systems being installed on the project.
- Card scheme registrations are valid and at the correct category for the role.
- Any operative who cannot demonstrate the required competence is refused permission to carry out fire safety or structural safety work until evidence is provided.

Competency evidence for fire safety and structural safety roles is retained in the project quality file and forms part of the golden thread of building information. Records are retained for the duration of the project plus six years, or for the life of the building where required under the Building Safety Act for higher-risk buildings.

9. Training and Continuous Professional Development

9.1 Annual Training Needs Analysis

Each year, the Quality Manager and Compliance Officer carry out a training needs analysis (TNA) that identifies competency gaps across the workforce. The TNA considers:

- Changes in legislation, regulation, or industry standards - including Building Safety Act requirements, British Standards updates, and Approved Document revisions.
- New work types, sectors, or project requirements that demand additional skills or knowledge.
- Findings from internal audits, non-conformance trend analysis, and incident investigations.
- Feedback from the workforce, clients, and sub-contractors.
- Card and certification renewal schedules for the coming year.
- Individual development objectives agreed through annual appraisals.

The TNA produces an annual training plan that is approved by the Director and funded through the annual training budget. Progress against the plan is reported at quarterly management reviews.

9.2 Mandatory Training

R&M maintains a schedule of mandatory training that all relevant personnel must complete and keep current. This includes:

- CITB Health, Safety and Environment test - required for all CSCS card applications and renewals.
- SMSTS / SSSTS - required for all site management and supervisory personnel, renewed every five years.
- First aid at work - required at all times on every project, renewed every three years.
- Fire safety awareness - required for all site personnel.
- Manual handling - required for all site personnel.
- Asbestos awareness - required for all site personnel working on refurbishment or demolition projects.
- Building Safety Act awareness - required for all management and supervisory personnel.

- Modern slavery awareness - required for all management and procurement personnel.
- Mental health awareness - required for all management personnel.
- Quality Management Policy (RM-QMP-001) - dedicated training on R&M's quality management arrangements is delivered to all relevant personnel at induction and refreshed annually, covering the complaints procedure, non-conformance management, inspection and test plan requirements, and individual quality responsibilities.

9.3 Accessible Training Formats

R&M is committed to ensuring that all training is accessible to every member of the workforce regardless of learning style, literacy level, or first language. Training is delivered in a mixture of formats including oral briefings and demonstrations, written procedures and handouts, visual and graphic materials (diagrams, photographs, annotated drawings), digital content (e-learning modules, video presentations), and practical on-the-job demonstrations. Where English is not an operative's first language, R&M provides translated key safety and quality documents, uses visual aids and pictorial signage, arranges buddy systems pairing the operative with a bilingual colleague, and confirms understanding through practical demonstration rather than written test alone. Training materials are reviewed periodically to ensure they remain clear, current, and accessible to all.

9.4 Role-Specific and Specialist Training

Beyond mandatory training, R&M provides role-specific and specialist training based on the competency matrix and TNA findings. Examples include:

- Manufacturer product training for proprietary systems - fire stopping, cladding, waterproofing, structural connections.
- Temporary works coordinator and supervisor training.
- Scaffold inspection (CISRS advanced scaffolder or scaffold inspection training scheme).
- Confined spaces, working at height, and excavation competency training.
- Quality management and inspection skills for site supervisors.
- Non-conformance investigation and root cause analysis for site managers.

9.5 Supply Chain Sustainability School

R&M is a registered member of the Supply Chain Sustainability School and encourages all management personnel to complete relevant learning pathways. The School's quality management, health and safety, and people development modules provide structured CPD that supports competency development. R&M promotes School membership to sub-contractors as part of the supply chain development programme.

9.6 Continuous Professional Development

All management and professional staff maintain a CPD log that records learning activities, training attended, qualifications achieved, and self-directed development. CPD logs are reviewed annually as part of the appraisal process. R&M supports CPD through funded training, time allowance for study, and sponsorship of professional body memberships where relevant to the individual's role.

10. Competency Records and Evidence Management

10.1 Central Competency Database

The Compliance Officer maintains a central competency database that records for every directly employed member of staff and regular agency worker:

- Name, role, date of engagement, and reporting line.
- Card scheme registrations - scheme, card number, category, expiry date, and verification date.
- Qualifications - qualification title, awarding body, date achieved, certificate reference.
- Training records - course title, provider, date completed, expiry date where applicable, certificate or attendance record reference.
- Professional memberships - body, membership grade, membership number, renewal date.
- CPD log - annual summary of learning activities and hours.
- Induction records - site name, date of induction, inducting manager.
- Competency assessment outcomes - including any restrictions, conditions, or additional training requirements.

10.2 Project Competency Records

Each project maintains a site-level competency file that contains:

- Site induction register with card details and expiry dates for every person who has worked on the project.
- Copies or verified records of competency evidence for all personnel in safety-critical or quality-critical roles.
- Sub-contractor competency submissions and verification records.
- Task briefing and toolbox talk attendance records.
- Safety observation records relevant to competency and behaviour.
- Any competency-related non-conformances, corrective actions, or personnel changes.

Project competency records form part of the project quality file and are retained for the duration of the project plus six years, in line with limitation periods and Building Safety Act record-keeping requirements.

10.3 Sub-Contractor Competency Records

For each sub-contractor on the approved list, R&M holds:

- PQQ competency section responses and supporting evidence.
- Company accreditation and certification records with expiry dates.
- Competency evidence for key personnel (supervisors, safety-critical operatives) submitted at pre-start.
- Performance scorecard records including the competency and training dimension.
- Any corrective actions or improvement plans related to competency.

10.4 Data Protection

All competency records containing personal data are held in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Records are stored securely, access is limited to authorised personnel, and retention periods follow R&M's data retention schedule. Individuals have the right to access their competency records on request.

11. Addressing Competency Shortfalls

Where a competency gap or shortfall is identified - whether through pre-engagement checks, ongoing monitoring, inspection results, incident investigation, or audit - R&M follows a structured process:

- **Immediate restriction:** The individual is prevented from carrying out the task or role for which they lack demonstrated competence. For safety-critical work, this means immediate removal from that activity until competence is established.
- **Assessment:** The site manager or Compliance Officer assesses the nature and severity of the gap. Is it a missing qualification, expired certification, lack of specific product training, or a behavioural concern? The assessment determines the appropriate remedy.
- **Remedy:** The appropriate action is identified and implemented. This may include additional training, supervised work, practical assessment, mentoring, refresher courses, or reassignment to duties within the individual's demonstrated competence.
- **Verification:** Once the remedy is complete, competence is re-verified before the individual returns to the restricted role or task. Re-verification is recorded in the competency database.
- **Root cause review:** Where the gap suggests a systemic issue - for example, a training programme that is not covering the required content, or a sub-contractor consistently deploying under-qualified operatives - the Quality Manager investigates and implements preventive action to address the underlying cause.

12. Building Safety Act 2022 – Competence Requirements

The Building Safety Act 2022 introduced a statutory duty on all duty holders - including clients, principal designers, principal contractors, designers, and contractors - to ensure that the persons they appoint are competent. R&M's competency management arrangements are designed to demonstrate compliance with these requirements:

- **Duty to appoint competent persons:** R&M verifies competence before appointing any person to a role on a higher-risk building project. This includes internal appointments and sub-contractor engagements.
- **Organisational capability:** R&M maintains sufficient organisational capability - in terms of skills, knowledge, experience, and behaviours - to fulfil its duties as principal contractor or contractor. This is demonstrated through the competency matrix, training records, and the quality and safety management systems.
- **Individual competence:** Every individual carrying out design or building work on a higher-risk building must be competent for the specific work they are undertaking. R&M's pre-engagement checks and ongoing monitoring provide the evidence of individual competence.
- **Competence frameworks:** R&M's SKEB framework aligns with the industry competence frameworks published under BSI Flex 8670, PAS 8671, and PAS 8672. As sector-specific competence frameworks are published and adopted, R&M will update its competency matrix and verification processes accordingly.
- **Record keeping:** The golden thread of building information required by the Building Safety Act includes competency records. R&M's project competency files contribute to the golden thread for each project.

13. Monitoring and Review

Compliance with this procedure is monitored through:

- Quarterly audits of competency records across the project portfolio by the Quality Manager.
- Monthly tracking of card expiry dates and mandatory training completion rates.
- Analysis of competency-related non-conformances and incident trends.
- Sub-contractor performance scorecards reviewed at quarterly supply chain meetings.
- Annual review of competency KPIs against targets at the management review.

This procedure is reviewed annually by the Quality Manager and Compliance Officer, and approved by the Director. Interim reviews are triggered by significant legislative change, a serious competency-related incident, or a material change in the scope or nature of R&M's operations. All changes are communicated to the workforce through toolbox talks, team briefings, and updated induction materials.

14. Related Documents

- Competency Matrix (by role category)
- Site Induction Register and Checklist
- Training Needs Analysis and Annual Training Plan
- Sub-Contractor Pre-Qualification Questionnaire
- Sub-Contractor Selection and Monitoring Policy
- Behavioural Safety Programme
- Right to Work Verification Policy
- Quality Management Policy (RM-QMP-001)
- Risk Management Policy
- Supervision, Instruction and Information Procedure

Document Owner: Thom McKenna, Director

Approved by: R&M Property Group Ltd Board of Directors

Date: June 2026

Next Review: June 2027 - Or before if regulation changes