



12 October 2022

Via Email to: BuildingRegulationsConsultation@levellingup.gov.uk

GS1 UK Response to: Implementing the new building control regime for higher risk buildings and wider changes to the building regulations for all buildings

GS1 UK is one of 116 politically neutral, not-for-profit GS1 organisations. Since 1969 our standards have formed the backbone of the global business language that identifies, captures, and shares key data on products around the world seamlessly and without friction – the best known of these standards being the barcode.

Whether in store, online, on the ward or on the construction site our standards have the power to deliver change now and in the future, making a real difference to businesses and wider society.

Whilst we welcome reform in this area and the introduction of a golden thread, we are deeply concerned by the proposal not to mandate the use of any data standards to underpin this. This is entirely contradictory to many of the fundamental principles of a golden thread and indeed many of the other intentions set out in the consultation document.

The proposals rightly place great emphasis on ensuring that language and information in the golden thread is consistent for the building, and that the language should be appropriate for the people who need to use it. But it then fails to set any meaningful data standard to ensure this consistency, instead opting to leave it up to individual interpretations on each individual building.

The Golden Thread must be underpinned by a global standard. Not doing so risks turning the golden thread into a series of snap-shots which do not correlate to each other. Our standards resolve this by ensuring high quality data and consistency.

Additionally, they do not limit innovation, are open, and are entirely interoperable across platforms and systems. To ensure that the golden thread is a success, it is vital that a global standard is mandated as a foundation for safety, security and sustainability

Many products used in construction already carry GS1 data standards, and many people use GS1 standards every day with no prior training. In Sweden all construction industry producers and suppliers use the Global Trade Identification Number (GTIN, a GS1 Standard) to track items, identify products, help digitalise the industry and improve safety. These standards allow for interoperability and traceability during the whole life cycle of a construction product.

We believe implementing these data standards give a consistent detailed picture to the golden thread, that both allows for ease of use, encourages innovation, and underpins the integrity of the golden thread.

This need for clear accurate up-to-date, accessible and unambiguous information also speaks to the Code for Construction Product Information, which was established by the Construction Products Association following the Hackitt review. The code looks to drive higher standards in the presentation of construction product information, with building safety being a priority.

We have gone into more detail on the golden thread in response to a few select questions below. We trust that you find out comments below helpful.

If you have any additional questions or queries, please contact our Head of Policy using the details at the end of this document.

Kind regards,
Sarah Atkins
Chief Marketing Officer
GS1UK

13. Do you agree or disagree with the proposal to not define digital in regulations?

Whilst we understand the desire to not define digital in the regulations, it is imperative that the data stored complies with GS1 standards. Without using GS1 data standards we risk compromising the golden thread, as the same materials can be classified differently across buildings, or even within the same electronic dataset, causing confusion. This may be especially true where one entity operates across multiple buildings.

Requiring data held within the golden thread to meet GS1 Standards would not require a definition of digital to be made within regulations. It would also grant the desired flexibility to avoid stifling innovation, whilst ensuring high quality data is being captured and shared.

GS1 standards are interoperable by design, meaning that they can ensure high quality data is collected then used across multiple platforms and 3rd party applications. This is why GS1 standards are trusted across almost all major retailers

in the UK, 100 million products globally, and used to improve patient safety in the NHS.

15. Do you agree or disagree with the proposed approach for the golden thread operating as a single point of truth and ensuring the information kept within it is one that allows for transfer of information and interoperability as described?

Yes, however this is only possible if the regulations mandate the use of GS1 standards. GS1 standards are fully interoperable across data platforms, systems and software, providing a golden thread from start to finish.

Interoperability must be at the centre of the golden thread, otherwise we risk creating breaks in the thread each time the information is transferred, as this essentially creates a new thread.

16. Do you agree or disagree with proposals around ensuring that information is able to be transferred?

Yes, information must be transferable and interoperable.

19. Do you agree or disagree with the proposed approach to ensuring the language/information in the golden thread is consistent for the building and that the language in the golden thread should be consistent and appropriate for the people who need to use it?

Yes, consistency in the information is key. Allowing individuals to describe materials is open to interpretation, whereas standards and data are not. Regulating to ensure consistent language is used, usually creates a level of complexity only reserved for the legal profession, whereas many people already use GS1 standards in day-to-day life.

Our concern here is that a focus on precise language over precise data will become excessively burdensome and ineffective, as individuals will default to a language style of their choice.

Using data standards avoids this problem, as there is no interpretation nor no default work-around. In addition, regulating for the use of GS1 standards would be a far less complex exercise, and these standards are already used and instinctive by industry and the general public.

20. Do you agree or disagree with the approach not to mandate that the golden thread needs to comply with a particular British standard or International standard or data dictionary?

Whilst we understand the desire to keep the golden thread flexible to support innovation, we do not believe that GS1 standards are mutually exclusive to this. Hundreds of thousands of businesses globally already use GS1 Standards to underpin their own golden threads, working alongside their own IT systems, apps, and databases.

We are non-profit membership organisation and work with our members and industry to tackle industry wide problems and increase supply chain visibility. We have also worked closely with other standards organisations such as BSI, linking our joint expertise to provide a common good for industry.

Building safety is a critically important issue that must be taken seriously. Put simply, we must know what our buildings are made from and be able to access this information quickly. We have seen quick and effective recall of products in other industries powered by GS1 standards, reducing recalling practices that previously took weeks to complete, into a couple of hours. Most notably during the Covid pandemic where a series of ventilators had to be recalled immediately. Identifying these ventilators, including their current use and location, would not have been as easy or quick task without the use of GS1 standards.

Ultimately, however strict the language guidance is, it will not compare to the data quality that can be achieved by using data standards – GS1 or otherwise.

We hope that you have found our comments helpful, and would welcome the opportunity to discuss the work of GS1UK with you, or how data standards can be better used more broadly in this area. If you have any further questions, please do get in touch using the details below.

Dan Bellis

Head of Policy

GS1 UK

M +44 (0) 7970 778 149

E Daniel.Bellis@gs1uk.org

