



THE NEW PART Q & WHAT IT MEANS FOR YOU



The new Approved Document Q (Security – Dwellings) was recently published and came into effect in England on 1st October 2015, bringing a minimum level of security into new dwellings.

The following sections outline our interpretation of what the implications are for those who are purchasing doors and windows:

1. Do I need to comply?
2. What is the requirement?
3. The ways to comply
4. What to be aware of
5. The costs & consequences
5. Bereco & Part Q compliance

1. Do I need to comply?

As with the introduction of other Building Regulations, Approved Document Q will be phased in. The regulation applies to all new buildings, unless a full plans application, or the building notice was submitted before 1st October 2015 (in which case, the actual work needs to be started prior to 1st October 2016). This means that a developer submitting plans from 1st October 2015 will need to ensure that the buildings comply with Approved Document Q.

For example, if a developer submitted plans for a dwelling on 13th September 2015, the dwelling would not need to comply with Approved Document Q. However, they would need to start building before 1st October 2016 in order to be exempt.

The following table summarises the various scenarios, showing when a developer would and would not need to comply:

	Either full plans or building notice submitted before 1st October 2015	Neither plans or building notice submitted until after 1st October 2015	Revised plans submitted after 1st October 2015
Building works started before 1st October 2016	Exempt	Must Comply	Possibly exempt if original plans were submitted before 1st October 2015*
Building works started after 1st October 2016	Must Comply	Must Comply	Must Comply
Building completion between 1st October 2015 & 1st October 2016	Exempt	Must Comply	Possibly exempt if original plans were submitted before 1st October 2015*
Building completion after 1st October 2016	Only exempt if work started before 1st October 2016	Must Comply	Possibly exempt if original plans were submitted before 1st October 2015 and work started before 1st October 2016*

* This would need to be confirmed with the Building Control Body and/or Planning Body.

“ Third party certification to PAS24:2012 or an equivalent standard exceeds the requirements of Approved Document Q. It is also the requirement for Secured by Design approval. The use of third party certified doors, windows and rooflights should simplify the process for approval by the Building Control Officer. In addition, under our new National Building Approval scheme, Secured by Design can approve a house type so that it can be built with security exceeding the legislative requirements in all parts of the UK. However, Secured by Design will only approve the house type when the doors, windows and any rooflights are third party certified.”

Mick Reynolds – Secured By Design 26.11.2015

2. What is the requirement?

The absolute requirement of Part Q is defined in one paragraph on page 2 (Requirement Q1) of the approved document with the rest of the document providing guidance as to how it can be met. Requirement Q1 states:

Reasonable provision must be made to prevent unauthorised access to:

- Any dwelling
- Any part of a building from which access can be gained to a flat within the building.

Approved Document Q is designed to ensure the prevention of unauthorised access to dwellings (including flats). As part of this, **doors and windows** which could be accessed will need to resist physical attack by a casual or opportunist burglar. They therefore must be sufficiently robust, fitted with appropriate hardware and most importantly, be **proven** to have security performance.

Windows and doors that are easily accessible can be:

Basement	Ground Floor	Above Access Balcony	Above flat / sloping roof (<30 degree pitch)
✓ Windows	✓ Windows	✓ Windows	✓ Windows
✓ Doors	✓ Doors	✓ Doors	✓ Doors
✓ Combination of windows & doors			

*Basement & ground floor accessible level surface is within 2m vertically to any part of the window/door.

The following image and extract is taken from the Departments for Communities & Local Government document:

**Housing Standards Review
Security in new dwellings.**



What does easily accessible include?



All the windows and doors in the photo are deemed to be easily accessible.

Either:
a window or doorway, any part of which is within 2m vertically of an accessible level surface such as the ground or basement level, or an access balcony, or
a window within 2m vertically of a flat or sloping roof (with a pitch of less than 30°) that is within 3.5m of ground level.

3. The ways to comply

Only **one** of the following must be met for the products to comply with the approved document.

- 1 Test evidence (Windows & Doors)**
 Test reports can be obtained which **exactly** match the specification of the product that the manufacturer is supplying. In most cases the size of the products will vary, so test reports will need to be obtained for each and every size purchased.
- 2 Where the manufacturer is using third party certification (Windows & Doors)**
 The manufacturer can obtain third party certification on the product, with a scope of approval that includes the product that is being supplied.
- 3 Product is designed in accordance with Appendix B (Doors only)**
 The Approved Document includes an Appendix B, which allows the manufacturer to build their doorsets to a pre-determined specification.

Responsibility for reviewing test evidence

The following table sets out who is responsible for reviewing test evidence against the product being supplied.

	Manufacturer	Builder / Developer / Architect	Third Party Certification Body
Option 1 Test Evidence	All variations must be tested and evidence supplied.	Review Required	N/A
Option 2 Third Party Certification	Supply evidence that products are covered by certification.	No Review Required	Responsible for compliance to PAS 24:2012
Option 3 Appendix B	Doors must fully meet Appendix B specification.	Review Required	N/A

Responsibility for compliance

People who are responsible for building work (e.g. agent, designer, builder or installer) must ensure that the work complies with all applicable requirements of the Building Regulations. The building owner may also be responsible for ensuring that work complies with the Building Regulations. If building work does not comply with the Building Regulations, the building owner may be served with an enforcement notice.

4. What to be aware of

1 Where the manufacturer is using test evidence

Given the bespoke nature of windows and doors, it simply would not be economically feasible to have testing carried out to cover every variation of design and size.

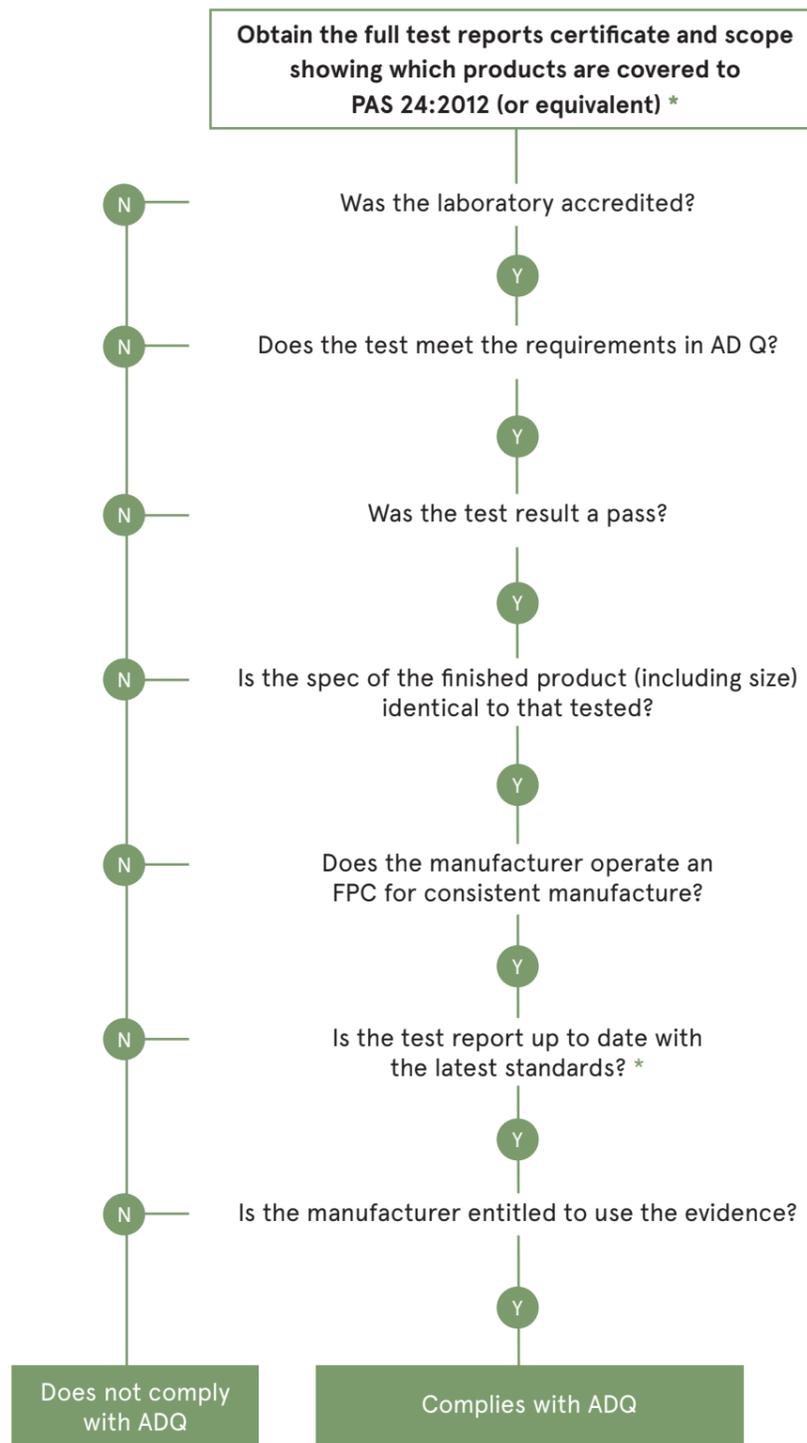
Developers will need to obtain evidence from the manufacturer of their doors and windows to show that the products they are purchasing have been **proven** by test to comply with either PAS 24:2012*, or another standard that has equivalent or better performance (STS 201, LPS 1175, STS 202 and LPS 2081 are listed in the Approved Document).

Note, if using a non accredited UKAS laboratory, the onus would be on the manufacturer (and then the developer) to demonstrate the labs equivalent credibility if the test was called into question at a later date.

* Note 21.12.1: BS 7950:1997 was withdrawn on 31/08/2012 and replaced by PAS 24:2012

PAS 24:2012 has since been replaced with PAS 24:2016 as of the 1/4/2017.

If a manufacturer supplies test evidence to EN1627, they will also need to demonstrate compliance to Annexe A of PAS 24, which is not covered by EN 1627.



2 Where the manufacturer is using third party certification

The second option is for the manufacturer to obtain third party certification on an enhanced security scheme from a recognised UKAS body, with a scope of approval that includes the product that is being supplied. This is acceptable because the certification body is putting their name to the variations from the tested product, which gives it the same credibility as test evidence.



This has the advantage of not only providing increased confidence in the product through factory production control and audit testing requirements that are part of the enhanced security certification, but also ensures products are tested to the latest standards. The products conforming to these schemes will also be listed as part of that certification.

As the guidance suggests UKAS accredited test laboratories should be used. It follows that if using the certification route, the certification body must also be accredited. Secured by Design (SBD) New Homes 2016 design guide has lists of these certification bodies with compliant manufacturers listed on the SBD website.

Most third party certification bodies will also have a search facility on their website which will allow you to identify companies that are certified by them.

3 Where a doorset is designed and manufactured in accordance with Appendix B

If the manufacturer is claiming compliance via Appendix B, the buyer should note that there are a number of security aspects set out in this addition that are extremely onerous, have little flexibility and all of which MUST be adhered to. These cover:

1. Door sizes.
2. The materials they are constructed from.
3. The dimensions of rails, stiles, muntins, rebates & panels.
4. The locks, hinge types & hinge bolts.
5. Use of door limiters.
6. Letterplate sizes and positioning.
7. High security glazing.

It would be the buyers responsibility to ensure ALL these are met to the standards referenced in appendix B. Three of these in particular are: **1. Door Size** **2. Density** **3. Panel Sizes**

1 Max Door Size 1000 x 2000mm

The requirements set out in Appendix B only relate to doors up to and including 1000mm wide x 2000mm high.

2 Timber density of 600kg/m³

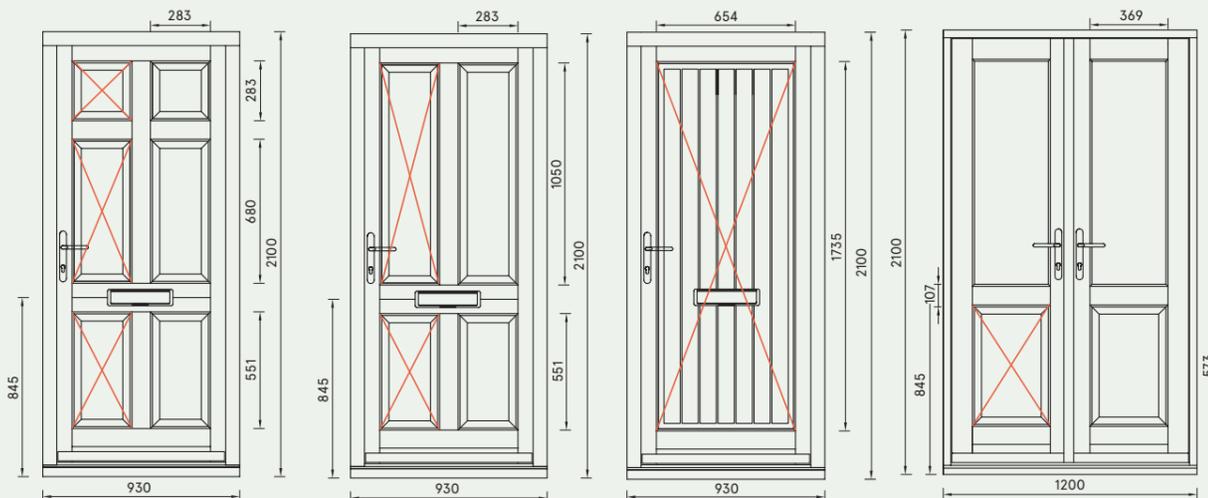
The timber used to construct the doorset must have a minimum density of 600kg/m³. This rules out softwood completely, and only allows certain species of hardwood.

3 Panel Sizes

Common Door Styles That Do Not Comply

If a product is to be supplied in accordance with Appendix B, one dimension of all panels must be 230mm or less therefore these common door styles do not comply.

APPENDIX B ALSO DOESN'T CURRENTLY COVER WINDOWS, ALTHOUGH WE UNDERSTAND THAT THERE ARE PLANS TO INCLUDE THESE IN EITHER A LATER VERSION OF THE APPROVED DOCUMENT OR AS A GUIDANCE FOR SBD.



In the majority of circumstances Entrance & French Doors are wider than those shown above, further exaggerating the issue.

PLEASE REMEMBER THIS ONLY APPLIES TO DOORS WHEN TEST EVIDENCE OR THIRD PARTY CERTIFICATION IS NOT PRESENT.

5. The cost & consequences

The costs associated with compliance

Developers should expect there to be a price difference between a company that has complied and one that has not. It is important to check the detail when comparing suppliers, to make sure that you are comparing similar specifications and that the products comply with the regulations.

The associated costs of complying may not be as you expect. Certification may initially appear to be more onerous for the manufacturer, and you might therefore expect that the cost of a compliant product may be more when the manufacturer has taken this route. For example, a supplier who has no certification or test evidence, would then need to use hardwood, which will significantly increase cost of the product. Without test evidence or certification, the majority of Entrance and French Doors designed with panels couldn't be purchased either, which would compromise the whole building design.

The consequences of getting it wrong

This is potentially the million dollar (or pound) question as a developer is likely to stand to lose a lot of money if caught out on this one.

We believe there are 3 main scenarios as follows:

Scenario 1

Initially, you could have windows installed into your building and then find that the Building Control Body is unwilling to sign them off without proper evidence.

What Happens

This may not happen at the outset, because as with all new regulations, it can take a while for enforcers to get up to speed. However, as the enforcement bodies get to grips with Approved Document Q, they are more likely to spot problems. When this happens, you would be at best looking at a delay while the manufacturer proves that the product actually complies. If all goes well, they will book into a test laboratory, test their window, and it will pass.

Consequences

This would involve lead times of up to 8 weeks to produce the windows or doors (which need to be to the exact specification to that fitted), another 6 weeks for the test slot to be available, followed by a lead time for the report to be written, which often takes a minimum of 6 weeks from the test date. It is likely that multiple products would need to be tested to cover all those supplied.

The question to ask yourself then is what the impact of a minimum 20 week delay would be on the building project?

Scenario 2

The window or door may not actually pass the test.
(Test labs would probably agree that they often don't pass first time).

What Happens

You would then have to wait for the lab to be free again in order to re-test for a pass result. This may take several attempts before a positive result has been achieved. Once presented with the new test, the enforcement body should check that the tested specification is the same as that installed in the building.

Consequences

Because some redesign was required to pass the test, it won't be the same so all of the installed windows and doors would need to be either re-worked or replaced.

Scenario 3:

What happens in the situation where non-compliance with the regulation is not spotted before the building is signed off?

What Happens

There is a possibility that an opportunist burglar(s) subsequently finds that they can easily enter the houses on an estate.

Consequences

If an insurance company finds out that the building is in a possible breach of the Building Regulations they may refuse to pay out to the client. It isn't difficult to remove a window and put it through the test, so it is possible that the insurance company may request this to prove, beyond doubt, that the window or door is in breach of the Building Regulations. Once that has been **proven**, the insurance company will only need to work out who to put their losses on to, with the developer being the first likely port of call.

As well as potentially costing huge sums of money, all of the above scenarios, plus that non compliant product could also be reported to building control, are likely to cause reputational damage to the developer.

What are the likely further developments with Approved Document Q?

We understand that work is in progress to include windows in Appendix B. However, in order to facilitate this without testing and certification, it is likely that the specification required will have similar restrictions to that outlined for doorsets. This is unlikely therefore to be a viable alternative to testing and certification.

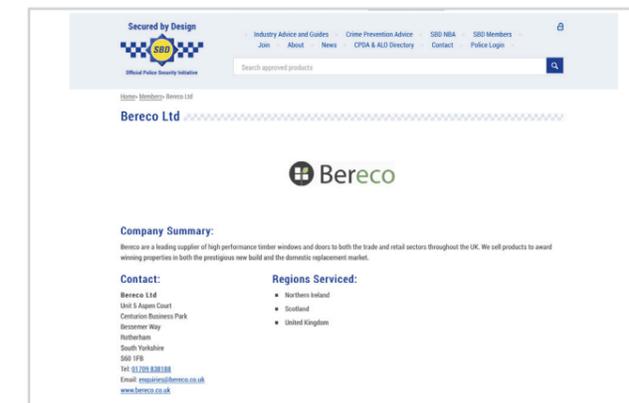
The Approved Document currently only applies to new dwellings. However existing dwellings are equally at risk from attack and it isn't difficult to imagine the regulations rapidly evolving to the point where eventually it covers extensions and replacement windows and doors. There isn't really an option to ignore this regulation, so you might as well deal with it now.

6. Bereco & Part Q compliance

Bereco products are PAS24:2016 tested and certified as members of BlueSky Certification schemes.

Certificates are shown on our website: www.bereco.co.uk/about/certification-warranties

Or on the SBD website with a full list of products that comply: www.securedbydesign.com/members/bereco-limited



Other things to consider:

Letter Plates



Letter plates, where provided, should:

- Have a maximum aperture of 260mm x 40mm, and
- Be located and/or designed to hinder anyone attempting to remove keys with sticks and/or insert their hand, for example by incorporating a flap or other features to restrict access.

Bereco Draftdodger letter plates comply:

- Anti-snap flap opens to 180 degrees with fully spring return.
- Secure through fixing ensures letter plate can only be removed from the inside of the house.
- Conforms to the requirement of BS EN 13724: 2002.
- Tested as part of a complete doorset that successfully achieved PAS 24.
- Flap cycle tested to 30,000 cycles.

Main Doors



The main doors for entering a dwelling (usually the front door) should have a door viewer unless other means exist to see callers, such as clear glass within the door or a window next to the doorset. The same doorset should also have a door chain or door limiter fitted.

Bereco offer a range of door chains and limiters www.bereco.co.uk/products/entrance-doors

Glazing

The glass requirement is not directly stated in ADQ other than Appendix B (option 3), but it refers to it in PAS24: 2012, which in turn refers to the SBD new homes document. This requires all doors and windows that are accessible (if not lockable) to be fitted with P1A Security Glass.

Bereco supply a minimum of P1A Glass which exceeds the minimum requirements.

Further commentary on security glass and the implications for SAP/CE Marking will be documented in our next technical release.

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01709 838188

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