

CISRS

CONSTRUCTION
INDUSTRY
SCAFFOLDERS
RECORD SCHEME

GLOBAL REVIEW AND PROPOSED REVISIONS TO THE CISRS OSTTS SCHEME

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Co-Authors: Clive Dickin, Group CEO, CISRS
and Paul Napper, Head of Training and
Education, CISRS

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INTRODUCTION

This paper sets out the current challenges with the Overseas Scaffolder Training Scheme (OSTS), by placing it in context of the realities of the global labour market, relevant regulations in the UK and current guidance issued by the National Access and Scaffolding Confederation (NASC).

The paper also takes into account responses from recent stakeholder consultation and suggests three different proposals for amending the scheme. It concludes by suggesting a three-stage programme of reform over the next three years.

BACKGROUND

The OSTS was launched in 2013 to cater for the training needs of scaffolders outside the UK. It has grown at pace, and now accounts for over 30,000 cardholders¹, more than CISRS² Part 2 card holders. There are now 22 training centres across the Middle East, Caribbean and Africa. The current growth rate³ of the number of OSTS cardholders, as well as the confusion among global employers about the different schemes, led to the recent consultation and to the need for this paper.

¹ According to latest data from NOCN.

² Construction Industry Scaffolders Record Scheme – www.cisrs.org.uk. The CISRS card is the recognised competence card for the UK's scaffolding and access sector, representing over 70,000 card holders across different levels.

³ Approximately 5% per month, according to NOCN data.

EXECUTIVE SUMMARY

This paper expands significantly on the existing OSTS Card Scheme Review and places it within the wider context of a globalised economy, free movement of labour, and the absence of a tightly regulated statutory competence framework for scaffolding and access labour at entry level within the UK.

The global scaffolding and access industry now operates within a mature international labour market. Training is delivered in multiple territories, often to standards that are robust, auditable and commercially recognised. Therefore, legitimately trained overseas operatives, particularly OSTS card holders, are entering the UK labour market. This is occurring in the context of UK legislation that places duties on employers to ensure competence, but does not mandate a specific qualification, training scheme or card requirement for scaffolding and access labour beyond broad legal duties.

This paper argues that the recruitment of basic scaffolding and access labour in the UK is, in practical terms, largely unregulated. It sets out the legislative framework, the role of NASC guidance, and the structural weaknesses created by the adoption of a two-tier system in 2013. It then explores three strategic options for the future and finishes with a proposed three-stage reform programme extending to 2028.

The paper concludes that harmonisation and uplift of standards is both inevitable and necessary, but that this will not be a simple transfer. It also concludes that the adoption of a two-tier system in 2013, driven largely by commercial considerations, has materially contributed to the current position.

1. GLOBAL CONTEXT: FREE TRADE, LABOUR MOBILITY AND SCAFFOLDING

The scaffolding and access sector operates within a global economy characterised by:

- Free trade agreements and international contracting
- Multinational clients operating common standards across jurisdictions
- A mobile workforce, particularly within industrial, petrochemical, energy and infrastructure sectors
- The growth of internationally delivered training and competence schemes

In many territories, scaffolding training is delivered to a high technical standard, often aligned to UK methodologies, TG20/TG30-style compliance and structured progression routes. The OSTS scheme emerged in 2013 to service this market, particularly in non-construction and industrial environments.

As global labour mobility has increased, it is both legitimate and inevitable that OSTS cardholders seek work in the UK. There is anecdotal evidence to show that this is currently occurring, although the latest skills gap report from NASC suggests it is not that common⁴. There is no prohibition in UK law preventing this, nor is there a statutory mechanism that automatically deems overseas scaffolding qualifications invalid.

Claims to promote the UK scheme and pointing out that OSTS-carded operatives require further training to meet UK standards can be hard to defend. The employer in many situations overseas has already employed the individual and trained them. While in the construction industry there are clear expectations within legislation set out below, other industries such as some industrial sectors accept

⁴ NASC Skills Gap Report 2026

lower standards. There is also a further communication challenge when it comes to addressing foreign workers, as well as overseas organisations and governments. Put simply, the CISRS OSTs scheme exists and any activity that suggests it is not up to the UK standard only serves to undermine the broader scheme and the entire CISRS programme.

2. THE UK LEGISLATIVE FRAMEWORK: BROAD DUTIES, NOT PRESCRIPTIVE STANDARDS

The UK operates a goal-setting regulatory regime. Legislation requires outcomes to be achieved but doesn't prescribe how competence must be demonstrated or which qualification framework must be used. This creates scope for schemes such as CISRS to provide industry-recognised assurance of competence.

2.1 The Health and Safety at Work Act 1974

The Health and Safety at Work Act 1974⁵ places a general duty on employers to ensure, so far as is reasonably practicable:

- The health, safety and welfare of employees,
- That non-employees are not exposed to risks.

The Act does not mandate specific training schemes, cards or qualifications. Competence is defined by the employer, and the Health & Safety Executive (HSE) has enforcement powers to prosecute organisations and company directors not defined.

2.2 Work at Height Regulations 2005

The Work at Height Regulations⁶ require that:

- Work at height is properly planned,
- Those involved are competent or, if being trained, supervised.

There is no statutory definition of what constitutes competence for a scaffolding labourer or trainee scaffolder, nor is there any requirement to hold a CISRS, OSTs or equivalent card. The Work At Height Regulations do point to a recognised level of competence and the CISRS OSTs programme is considered to meet this level in several other countries.

2.3 Construction (Design and Management) Regulations 2015 (CDM)

The Construction (Design and Management) Regulations 2015⁷ (CDM) require duty holders to ensure that:

- Workers have the skills, knowledge, training and experience.

CDM deliberately avoids mandating qualifications. The Regulations rely on employer judgement and management systems. This creates flexibility, but also inconsistency. The CISRS card is seen as offering that level of competence. But due to the current two-tier system, greater clarity is needed at a global level.

⁵ www.legislation.gov.uk/ukpga/1974/37/contents

⁶ www.legislation.gov.uk/uksi/2005/735/contents

⁷ www.legislation.gov.uk/uksi/2015/51/contents

2.4 The Building Safety Act⁸ and associated regulations

The Building Safety Act regime focuses on high-risk buildings, accountability and competence of duty holders. While competence is emphasised, particularly at management and professional levels, there remains no statutory entry-level scaffolding qualification requirement. In the UK, the Construction Skills Certification Scheme (CSCS) requires that carded operatives reach a level 2 qualification (Part 2 Scaffolder). This is incompatible with the OSTS programme, as the OSTS doesn't constitute a NVQ while meeting international occupational standards.

2.5 The role of NASC guidance

NASC⁹ guidance, including TG20¹⁰, TG30¹¹ and other publications, represents best practice in the scaffolding and access sector and is widely recognised as such by clients, designers and regulators. However:

- While it is recognised as industry standard and is enforced through UK statute, NASC guidance is not law
- Membership of NASC is voluntary
- Compliance is contractual or reputational, not statutory

NASC guidance also does not regulate labour entry standards. It assumes competence already exists.

3. THE REALITY: AN UNREGULATED ENTRY-LEVEL LABOUR MARKET

In practice, the recruitment of basic scaffolding and access labour in the UK is largely unregulated except within the construction sector: where the Construction Leadership Council (CLC), which is jointly chaired by the Construction Minister, has driven adoption of minimum qualification standards of RFQ / Level 2 qualifications and continuous professional development (CPD). There are no demands on the global workforce or in other sectors or industries within the UK.

- There is no legal requirement for a scaffolding labourer to hold a CISRS card, but the card is recognised as the employers' competency standard to meet the Health and Safety at Work Act and Work At Height Regulations along with other relevant laws
- There is no legal prohibition on employing an overseas-trained operative
- The OSTS card does not assess scaffolding competence.

⁸ www.legislation.gov.uk/ukpga/2022/30/contents

⁹ National Access and Scaffolding Confederation – www.nasc.org.uk

¹⁰ nasc.org.uk/information/tg2021/

¹¹ nasc.org.uk/information/tg30/

Employers can make their own judgements, often under commercial pressure, programme constraints and in situations of labour shortages.

This creates a fragmented market where:

- UK labourers may enter with minimal formal training
- Overseas operatives may enter with higher baseline competence
- Clients often can't distinguish between differing card schemes

Another weakness in the current system is that OSTS scheme providers must have a UK-based headquarters. A decision was taken in 2020 to allow one centre operation to deviate from this rule without proper approval. This was regularised in 2025. While well intentioned to support and ensure quality, this model of needing a UK HQ is outdated, restricts growth and leads to confusion. This paper argues that overseas partners should not need to meet this obligation, if the audit process is properly expanded globally to ensure quality is maintained at the same standard everywhere.

4. THE TWO-TIER SYSTEM INTRODUCED IN 2013

The adoption of a two-tier system in 2013 created a structural divide between UK CISRS labourer/trainee routes and overseas OSTS Level 1 and above routes.

At the time, this approach was largely driven by commercial and market-access considerations rather than long-term workforce strategy. The consequences have included a lower UK entry standard than the OSTS Level 1 standard, market confusion, perverse incentives for employers and a gradual erosion of the perceived integrity of the UK baseline. With hindsight, this system should not have been adopted.

5. STAKEHOLDER CONSULTATION FEEDBACK AND INDUSTRY EVIDENCE

The proposals in this paper are not theoretical. They are grounded in direct feedback gathered through a CISRS consultation undertaken in the fourth quarter of 2025, which included:

- A formal survey issued to all CISRS training centres
- Five structured one-to-one telephone consultations
- Written submissions from centres and stakeholders
- Direct discussion at the CISRS Board in December 2025

Although response rates from the consultation process were modest (11 responses from 39 centres, representing 28%), the feedback was nevertheless consistent across several critical areas. This feedback reinforced the need for structural reform.

5.1 Key Themes from the consultation

The consultation feedback provides clear qualitative and quantitative evidence that the current arrangements are no longer sustainable. While stakeholders differed on pace and mechanism, there was broad consensus on the broad direction of travel.

Consultation timetable

In September 2025, all CISRS training centres, based in the UK and globally were invited to a consultation webinar, detailing the rationale for the changes and the consultation mechanism.

A link to an independent survey was then emailed to all the training centres asking for input on a range of questions. This survey gathered nine survey responses (two of which from international providers).

This was followed by a series of one-to-one meetings in October 2025 with five centres based in the UK, and one based overseas.

Domestic workforce protection

Several consultees stressed that any reform must not undermine UK apprenticeships and other early career routes. One typical comment from a centre director was:

"We can't fix an international problem by weakening domestic standards. The UK apprentice route must remain protected and clearly superior."

This feedback directly supports the following proposal to uplift the UK baseline rather than dilute overseas standards.

Quality and compliance risk

Training providers expressed concern that any misalignment between schemes exposes employers to unmanaged risk. As one survey respondent noted:

"Employers think they are buying competence, but the schemes are no longer clearly differentiated. That is a real compliance issue waiting to happen."

This reinforces the argument that reliance on employer judgement alone is insufficient.

OSTS Level 1 compared to CISRS Labourer Card

There was widespread acknowledgement that the OSTS Level 1 already exceeds the UK Labourer Card in both duration and technical expectation. As one stakeholder stated:

“It is increasingly difficult to explain why an overseas Level 1 operative has done more training than a UK labourer. The logic no longer stacks up.”

This feedback directly underpins Option 3, raising the UK entry standard to OSTS Level 1 equivalence.

Market confusion and card recognition

Throughout the consultation, both centres and employers frequently highlighted confusion at the client level, particularly in industrial and non-construction sectors. One comment explained this issue succinctly:

“Clients simply don’t understand the difference between CISRS, OSTS and CSCS. To them, a card is a card.”

This supports the need for a single, clear baseline standard with improved governance.

Operational caution and phasing

While supportive of some of the suggested reforms, stakeholders consistently warned against sudden change. As one commentator advised:

“Any change needs to be phased and properly signposted. A big bang approach would damage training capacity overnight.”

This type of feedback justifies the proposed three-stage reform programme and transitional arrangements.

Taken together, the consultation evidence strongly supports harmonisation, uplift of entry standards and phased implementation, rather than retention of the status quo.

6. STRATEGIC OPTIONS

Option 1: Retain the current two-tier system

This option would maintain the status quo.

Advantages:

- Simplicity – no change is often the easy route

Limitations:

- Continued recruitment of underqualified or minimally qualified labour
- Increasing reliance on employer judgement
- Ongoing confusion for clients
- No integration of system scaffolding or other forms of scaffolding within the syllabus
- Reputational risk to CISRS and NASC

This option also effectively accepts lower standards at entry level.

Option 2: Global adoption of the UK standard

Under this option, the UK standard would become the global benchmark.

Advantages:

- Clear leadership by the UK
- Strong brand integrity

Limitations:

- Some territories will not adopt the standard
- Lower-cost jurisdictions will continue to operate by reduced standards
- UK employers will still access lower-standard labour via global supply

This option improves alignment but does not eliminate lower standards globally.

Option 3: Uplift the UK labourer standard to OSTs Level 1

This option proposes changing the UK system to reflect a clearer pathway from Labourer to Basic Scaffolder (Equivalent to Part 1) to Trainee Scaffolder (Equivalent to Part 2) to Scaffolder (Equivalent to a Part 3) to Advanced Scaffolder (Equivalent to a Part 4).

Advantages:

- The use of technology to deliver training globally, where it is appropriate
- The creation of a single baseline standard
- A generic core course
- It allows for modular additions for system scaffolding and frame variants
- Alignment with TG30 principles
- The creation of a single, globally recognisable, entry point

Limitations:

- Significant, increased cost on employer for entry level staff operative
- Significant, and in some cases difficult, cultural change is required
- Parallel operation for an initial period
- A gradual, three-phase roll-out means it may take longer

7. SYSTEM SCAFFOLDING AND TG30 ALIGNMENT

A critical weakness in the current framework is the separation of tube and fitting from system scaffolding.

The proposal includes:

- Amending system scaffolding courses to align with TG30 standards
- Creating a single, generic base course for system scaffolding
- Adding system-specific modules

This approach better reflects modern industry practice and reduces duplication. It also allows for improvement of the training framework by recognising different national approaches.

8. PROPOSED THREE-STAGE REFORM PROGRAMME

Stage 1 – 2026

- Amend system scaffolding courses to align with TG30
- Introduce UK-delivered courses into OSTs
- Position the OSTs card explicitly as an Industrial card
- Confirm that CISRS Part 2 and above remain Construction and Industrial cards
- Remove the obligation to operate a UK headquarters to train overseas

Stage 2 – Transition period

- Maintain parallel operation with clear labelling
- Strengthen governance and oversight
- Prepare global delivery infrastructure

Stage 3 – 2028

- Release a combined global programme
- Enable upgrade from UK Labourer to OSTs Level 1 equivalent
- Establish a single global baseline standard.

9. RISK REGISTER

The following risk register identifies key strategic and operational risks associated with both action and inaction.

Risk	Description	Likelihood	Impact	Mitigation
Status quo risk	Continued recruitment of minimally trained labour	High	High	Uplift UK baseline standard
Reputational risk	CISRS brand diluted through misalignment	High	High	Harmonized global framework
Employer compliance risk	Employers unknowingly rely on lower standards	Medium	High	Clear card structure and guidance
Training capacity risk	Insufficient UK or overseas delivery capacity	Medium	Medium	Phased rollout and digital delivery
International adoption risk	Some territories refuse higher standards	High	Medium	Accept modular adoption
Cost escalation	Increased training cost deters entry	Medium	Medium	Modular, technology-enabled delivery
Workforce disruption	Sudden change reduces labour availability	Low	High	Transitional arrangements
Legal challenge	Perceived restriction of labour mobility	Low	Medium	Maintain non-mandatory, competence-based approach

10. CONCLUSION

This is not an easy transfer. Harmonisation of global competence frameworks requires:

- Cultural change
- Commercial adjustment
- Significant governance

However, maintaining the current position is not sustainable.

The two-tier system adopted in 2013, largely for commercial reasons, has contributed directly to the current misalignment. The industry now faces a strategic choice to accept lower standards or lead a global uplift.

This paper concludes that raising the UK entry standard to align with OSTS Level 1, supported by technology and modular training, is the only credible, long-term solution with the uplift of the UK scheme standard to global standards. The phased approach of the proposed programme, along with the OSTS card being rebranded to an industrial card and the UK scheme being made available overseas, along with the suggested phased approach, would mean that the transfer to the new fully global scheme would be complete by 2028. This gradual, but significant shift in the approach to training around the world would result in a clearer, simpler and safer standard of training and ultimately better standards of trained scaffolders everywhere.

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