

Quantity Surveyor's Duty of Care: Dhamija v Sunningdale Joineries Limited (2010)

A recent court ruling has confirmed the position adopted in *Sutcliffe v Chippendale & Edmondson* (1971) in relation to the scope of a quantity surveyor's duty of care; their duty of care is limited to issues of quantity and not quality. In *Dhamija*, the claimant alleged that the quantity surveyor had a duty to only value works that were "properly executed" and "not obviously defective" and that the quantity surveyor had a positive duty to bring defective work to the attention of the architect. The court disagreed, holding that the quantity surveyor's duty of care did not extend to issues of quality. The court refused to infer a positive obligation on a quantity surveyor not to value work that was obviously defective. The court stated that the architect had the responsibility for the quality of the works and the responsibility for notifying the quantity surveyor of any defects that may affect his valuation of the works.