

### Building Safety Policy (High-Rise / High-Risk Buildings)

#### 1.0 Introduction

- 1.1 The Building Safety Act 2022 (the 'Act') received Royal Assent on 28 April 2022. The Act includes fundamental changes to improve building and fire safety; its ultimate objective is that people will be, and will feel, safer in their homes.
- 1.2 As a landlord and building owner, The Wrekin Housing Group (the 'Group') must act to identify, manage and mitigate risks associated with building and fire safety for buildings that we own and manage to ensure that we protect our residents, buildings and anyone else who may be affected by our business.
- 1.3 The objective of this policy is to ensure that the Group's Board Members, Executive Directors, Senior Managers, employees, partners and residents all understand our legal building safety obligations, and the framework, by which everyone should operate within to meet these obligations.
- 1.4 This policy forms part of our wider organisational commitment to a positive safety culture and should be read in conjunction with our corporate [Health and Safety Policy](#) and [Fire Safety Policy](#).
- 1.5 This policy applies only to buildings within the scope of Part 4 of the Act which are defined as: higher-risk buildings with at least seven storeys or at least 18 metres in height, and either:
- have at least two residential units; or
  - are hospitals or care homes (when they are being designed and constructed).

#### 2.0 Policy Statement

- 2.1 We acknowledge and accept our responsibilities under the 2021 Order and the Building Safety Act 2022 as outlined in **Sections 7 and 8**.
- 2.2 We will meet the requirements of Planning Gateway 1 for relevant buildings within new development schemes, although we currently have no higher-risk buildings in development, nor future plans to develop these.
- 2.3 We will meet all our dutyholder and Accountable Person duties, and we set out what we will do in **Section 9**.
- 2.4 We will comply with the Regulatory Reform (Fire Safety Order) 2005 and ensure that each property requiring a fire risk assessment (FRA) will have one that has been carried out by a competent fire risk assessor (see our [Fire Safety Policy](#) for further details).
- 2.5 We will meet all legal fire safety requirements under the Fire Safety Act 2021 and Fire Safety (England) Regulations 2022 (see our [Fire Safety Policy](#) for further

details). The Fire Safety Policy specifically details the requirements for all multi occupied residential buildings, including the specific additional provisions for high rise buildings covered by this policy, such as:

- provide the local Fire and Rescue Service with up-to-date electronic building floor plans and place a hardcopy of these plans, alongside a single page building plan which identifies key firefighting equipment, in a secure information box on site;
- provide the local Fire and Rescue Service information about the design and materials of the building's external wall system and inform the Service of any material changes to the walls;
- provide information to the Fire and Rescue Service in relation to the level of risk that the design and materials of the external wall structure gives rise to and any mitigating steps taken;
- undertake monthly checks on the operation of lifts intended for use by firefighters, and evacuation lifts and check the functionality of other key pieces of firefighting equipment and make a record of any checks (which is available to residents);
- report any defective lifts or equipment to their local Fire and Rescue Service as soon as possible after detection if the fault cannot be fixed within 24 hours;
- install and maintain a secure information box in their building, containing the required information;
- install signage visible in low light or smoky conditions that identifies flat / floor numbers in the stairwells.

2.6 We will ensure all higher-risk buildings receive all applicable property compliance inspections, surveys and checks (periodic electrical inspections, gas safety checks, fire door checks, emergency lighting tests, and so on).

2.7 We will operate a programme of routine building inspections and checks to help identify and address any day-to-day risks which may arise from resident behaviour, building wear and tear, and other issues.

2.8 When letting properties within higher-risk buildings, we will consider the suitability of the accommodation for the prospective resident in respect of building and fire safety.

2.9 Personal emergency evacuation plans (PEEPs) and person-centred fire risk assessments (PCFRAs) will be carried out by a competent person, reviewed annually, and made available to the Fire and Rescue Service where required.

2.10 We will work with West Midlands Fire Service through our Primary Authority Partnership arrangement to receive advice and training and share relevant information.

2.11 We will operate a robust process to gain access should any resident or leaseholder refuse access for us to carry out our Accountable Person duties. We will issue a contravention notice or apply to the county court for an order for access.

- 2.12 We will operate a robust process to manage resident vulnerability and tenancy management issues (including hoarding) whilst ensuring we safeguard the wellbeing of the resident.
- 2.13 We will operate effective contract management arrangements with the contractors responsible for delivering building and fire safety related works, including ensuring contract agreements are in place, conducting client-led performance meetings, and annually checking that contractors' employee and public liability insurance is in date.
- 2.14 We will comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM), including where the roles of Client, Principal Designer, Designer, Principal Contractor and Contractor have additional duties under the Building Safety Act. A construction phase plan will be in place for all repairs, component replacements and refurbishment work.
- 2.15 We will operate effective arrangements to ensure that routine and planned repairs, maintenance and improvement works to our higher-risk buildings are carried out safely and do not create any risks.
- 2.16 We will require our tenants and leaseholders to request and receive approval for carrying out building work within their properties, including DIY and work which will be undertaken by a contractor or other third party on their behalf. We will consider all such requests and will only grant approval where we are satisfied that the work will be carried out safely; we will then post inspect the work to ensure it complies with the approval we have given.
- 2.17 We will implement and operate effective golden thread of information arrangements to record and evidence all required checks and safety arrangements are in place, and to provide visibility of any non-conformance and early warnings of potential risks.
- 2.18 We will ensure there is a robust process in place to investigate and manage all notifications made to the HSE and the BSR in relation to building and fire safety, required by either Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) or mandatory occurrence reporting under the Building Safety Act. We will act to address any issues identified and lessons we have learned, to prevent a similar incident occurring again.
- 2.19 We will implement and maintain emergency plans for each building, setting out the key risks for each and the actions that we will take in the event of a major incident or emergency to keep the building and residents safe and minimise the risk and impact from it. We will share these plans with all relevant agencies, including the relevant Fire and Rescue Service.
- 2.20 We are committed to ensuring we continually improve our approach to delivering building and fire safety.

### **3.0 Policy Scope**

- 3.1 This policy applies only to buildings within the scope of Part 4 of the Act which are defined as: higher-risk buildings with at least seven storeys or at least 18 metres in height, and either:
- have at least two residential units; or
  - are hospitals or care homes (when they are being designed and constructed).
- 3.2 The Group owns and manages three higher-risk buildings within scope of Part 4 of the Act:

Building	Storeys	Height (m)	Use
Apley Court, Wellington	9	20.8	Residential dwellings
Reynolds House, Ketley	12	27.9 (taken from twinned elevation plans)	Residential dwellings
Richards House, Donnington	8	18.2 (taken from twinned elevation plans)	Residential dwellings

- 3.3 This policy is relevant to all our employees, residents, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.
- 3.4 The policy should be used by all to ensure they understand the obligations placed upon the Group to maintain a safe environment for residents and employees, within the home of each resident, and within all common areas of buildings and other properties we own and manage. Adherence to this policy is mandatory.

## 4.0 Definitions

4.1 This glossary defines key terms used throughout this policy:

4.2 **BS 9997:2019:** Fire risk management systems. Requirements with guidance for use: BS 9997 is a fire risk management system published on 31 August 2019 by the British Standards Institution. The management of fire risk is a key responsibility for anyone in charge of buildings. A fire risk management system should be considered to protect the lives of people within the buildings as well as to ensure legal compliance.

4.3 **Building Assessment Certificate:** Once a building has been registered, the Principal Accountable Person will be required to apply for a building assessment certificate when they receive a direction to do so from the Building Safety Regulator (BSR) within 28 days - failing to do so, without a reasonable excuse, will be an offence.

The BSR will issue a Building Assessment Certificate where they are satisfied that that the Principal Accountable Person is taking reasonable steps to prevent

building safety risks. The certificate is also intended to provide assurance to residents must be displayed in a prominent place in the building. A building assessment certificate application is proposed to include:

- a copy of the latest safety case report for the building
- a copy of the residents' engagement strategy, and
- the mandatory occurrence reporting system.

**4.4 BSI Flex 8670: v3 2021-04:** This code of practice sets out core building safety competence criteria, including fire safety, structural safety and public health, to be included in sector-specific frameworks for individuals working in the built environment.

**4.5 Building Safety Regulator (BSR):** Under the Building Safety Act 2022, the BSR has been created to regulate higher-risk buildings and to oversee the regulatory framework for all residential buildings during the planning, design, construction and occupancy phases and provide a stronger and clearer framework for national oversight of construction products.

**4.6 CIOB Level 6 Diploma in Building Safety Management:** This qualification aims to develop the learner's knowledge and skills to manage the safety of a building in occupation.

**4.7 CDM:** The Construction (Design and Management) Regulations 2015 (CDM) applies to the whole construction process on all construction projects, from concept to completion, and aims to ensure that no-one is harmed during the work. Under the Building Safety Act 2022 existing dutyholders (Client, Principal Designer, Designers, Principal Contractor and Contractors) under CDM will have additional duties.

**4.8 Client:** The client is the person for whom the building work is done. They are required to:

- Appoint the right people with the right competencies (ensuring they have systems in place to comply with regulations).
- Appoint a Principal Designer to be in control of design work and Principal Contractor to be in control of building work, if there are several firms working on the project.
- Provide building information to every designer and contractor to make them aware that the project includes higher-risk building work.

**4.9 Fire statement:** A fire statement will evidence that fire safety matters (e.g., site layout, water supplies for firefighting purposes and access for fire appliances), as they relate to planning, have been incorporated into the planning application.

**4.10 FRA:** A fire risk assessment is an assessment involving the systematic evaluation of the factors that determine the hazard from fire, the likelihood that there will be a fire and the consequences if one were to occur.

**4.11 Gateway 2:** Gateway 2 stage is before building work begins. Applicants must submit a building control approval application to the BSR with plans and prescribed documents for their higher-risk buildings. Building work cannot begin

without BSR approval and it will be an offence to start building work without it as this is a hard stop point. If the application is approved, the BSR will agree a bespoke inspection schedule and will need to be notified as the stages of construction are complete.

4.12 **Gateway 3:** Gateway 3 stage is when building work is complete. Applicants must submit a completion certificate application to the BSR (which reflects as built not as designed work) for approval. The BSR will assess the application and carry out a final inspection of the building work. If satisfied that the building work complies with applicable building regulations, the BSR will issue a completion certificate. This is a hard stop point and the building cannot be occupied without the completion certificate.

4.13 **HSG65 Managing for health and safety:** HSG65 was published by the Health and Safety Executive in 2013. It explains the Plan, Do, Check, Act approach and shows how it can help organisations achieve a balance between the systems and behavioural aspects of management.

4.14 **ISO45001 Occupational Health and Safety Management System:** ISO 45001 is designed to prevent work-related injury and ill-health and to provide safe and healthy workplaces.

4.15 **PAS 8671:2022 & PAS 8672:2022 – Built environment – Framework for competence of individual Principal Designers and Principal Contractors (respectively):** PAS 8671/2 address competence thresholds that individuals are expected to meet when managing the dutyholder functions of Principal Designer and Principal Contractor roles and the additional requirements for working on higher-risk buildings.

4.16 **PAS 8673:2022 Built environment – Competence requirements for the management of safety in residential buildings:** PAS 8673 specifies competence requirements for managing safety in residential buildings and other developments incorporating residential accommodation. It also gives guidance on detailed competencies and the assessment of competence.

4.17 **Planning Gateway 1:** Planning stage is also referred to as Planning Gateway 1 and refers to the planning application stage. Its aim is to ensure fire safety matters are considered and incorporated at the planning stage for higher-risk buildings and requires the developer to submit a fire statement setting out fire safety considerations specific to the development with a relevant application for planning permission.

4.18 **Principal Contractor:** A Principal Contractor is appointed to be in control of the whole project during the construction phase. They are required to:

- Plan, manage and monitor all the building work
- Coordinate building work so it complies with building regulations
- Principal Designer: Principal Designers are appointed to be in control of all design work. They are required to:
- Plan, manage and monitor the design work during the design phase

- Coordinate design work so if built will comply with building regulations

## 5.0 Roles and Responsibilities

5.1 Under the Building Safety Act, the Group is a **dutyholder** if we commission, design and undertake building work on higher-risk buildings to which the Act building regulations apply. We will assume different dutyholder roles depending on which stage the higher-risk building is at.

5.2 During design and construction phases, as the building owner, the Group will always assume the role of **Client** (and Principal Designer where appropriate). The Client is the person for whom the building work is done and controls the contract, the finances, and the time available for the project. The Principal Designer is in control of all the design work during the design and construction phases.

5.3 Under the Act, when the building is occupied the Group is the Accountable Person. **An Accountable Person** is an organisation (or individual) who owns or has responsibility for a higher-risk building. It may also be an organisation who is responsible for maintaining the common parts of a building.

5.4 We have confirmed that there are no other organisations or individuals who have Accountable Person responsibilities for any of the three higher-risk buildings.

5.5 To fulfil the duties under the Act, the Group will delegate responsibilities to the Executive Director of Operations, Head of Property and Resident Safety Manager, who will implement and oversee the arrangements and delivery of building safety (**see Sections 5.8 - 5.11 below**).

5.6 **The Wrekin Housing Group Board** has overall governance responsibility for ensuring this policy is implemented to ensure compliance with legislation and regulatory standards. The Board will approve this policy and review it every two years (or sooner if there is a change in legislation or regulation). The Board will receive regular updates on the implementation of this policy, building safety performance and non-compliance.

5.7 The **Executive Team** will receive monthly performance reports in respect of building safety and ensure compliance is being achieved. They will also be notified of any non-compliance issue.

5.8 The **Executive Director of Operations** has strategic responsibility for the management of building safety, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy, and ensure there are the required resources to be able to implement.

5.9 The **Head of Property** will oversee operational delivery of building safety, monitor day-to-day implementation, and ensure adequate training and development of operational staff to demonstrate organisational competence.

5.10 The **Resident Safety Manager** has overall operational responsibility for the management of building safety and the three higher-risk buildings. They will be the named person required for registering the buildings and submitting mandatory occurrences to the Building Safety Regulator.

5.11 The **Resident Safety Manager** will be supported by the **Fire Category Manager**, **Estate Officers** and **Housing Officers** to deliver day-to-day management of our higher-risk buildings and maintain communication with residents to ensure safety standards are adhered to.

## 6.0 Legislation, guidance and regulatory standards

### 6.1 Primary legislation

- The Building Safety Act 2022 – the main provisions of the Act come into force from April 2023. Full implementation of the Act is in October 2023.

### 6.2 Secondary legislation

- The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 (the 2021 Order) - this introduces Planning Gateway 1 - came into force 1 August 2021.
- Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 – comes into force 6 April 2023.
- Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023 – comes into force 6 April 2023.
- The Building (Appointment of Persons, Industry Competence and Duty holders) (England) Regulations – in draft.
- Higher-Risk Buildings (Prescribed Principles for Management of Building Safety Risks) Regulations – in draft.

6.3 Draft legislation will be monitored for updates which may result in future changes to this policy.

6.4 Regulatory Standards – We must ensure we comply with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Home Standard is the primary one applicable to this policy. The Social Housing (Regulation) Bill will change the way social housing is regulated and may result in future changes to this policy.

6.5 Sanctions – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including:

- Compliance notices, urgent action notices, fines or imprisonment from the Building Safety Regulator.
- Prosecution or fines by the Health and Safety Executive (HSE) or Fire and Rescue Service.
- Prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007, which could result in unlimited fines, remedial orders and publicity orders.
- Compensation claims under the Defective Premises Act 1972 or Section 38 of the Building Act 1984.



- A regulatory notice or other sanction from the Regulator of Social Housing.

## **7.0 Obligations: The 2021 Order**

7.1 The 2021 Order introduced Planning Gateway 1 to ensure fire safety matters are considered and incorporated at the planning stage for schemes involving a relevant building. Relevant buildings contain two or more dwellings or educational accommodation and are at least seven storeys or at least 18 metres in height.

7.2 Under the 2021 Order, a developer is required to:

- Submit a fire statement setting out fire safety considerations specific to the development with a relevant application for planning permission for development which involves one or more relevant buildings.

## **8.0 Obligations: The Building Safety Act 2022**

8.1 The Act introduces Gateway 2 (building control approval) and Gateway 3 (when building work is complete) which are hard stop points throughout planning and construction phases for higher-risk buildings.

- Dutyholders must meet specific requirements (such as submitting a building control approval application) to receive approval from the Building Safety Regulator at each gateway before the next phase of construction or occupation of the building can begin.

8.2 Under the Act, the Client (during the design and construction phase of a higher-risk building) must:

- Ensure that the design and building work can be completed in accordance with building regulations by appointing the right people, with the right competencies (skills, knowledge, experience and behaviours or organisational capability).
- Where there is more than one contractor working on the project, appoint a Principal Designer to be in control of design work and a Principal Contractor to be in control of the whole project during the construction phase.

8.3 Under the Act, the Principal Designer (who in control of all the design work during the design and construction phase of a higher-risk building) must:

- Plan, manage and monitor the design work, ensuring that the design, if built, would comply with building regulations.
- Cooperate, communicate and coordinate our work with the Principal Contractor and other designers.
- Liaise with the Principal Contractor and share information relevant to the building work.

8.4 Under the Act, the Accountable Person for occupied higher-risk buildings must take reasonable steps to:

- Prevent a building safety risk happening, with building safety risk defined as 'spread of fire and/or structural failure'.
- Reduce the seriousness of an incident if one happens.

The Accountable Person must also:

- Register occupied, higher-risk buildings with the Building Safety Regulator (BSR).
- Apply for Building Assessment Certificates when instructed to do so by the BSR.
- Carry out a building safety risk assessment and review it regularly.
- Prepare safety cases and submit safety case reports to the BSR.
- Meet golden thread of information requirements.
- Establish and maintain a mandatory occurrence reporting system.
- Implement a Residents' Engagement Strategy.
- Implement a complaints procedure

## 9.0 Dutyholder & Accountable Person duties

9.1 The duties below are requirements under the Building Safety Act 2022 and apply to all three higher-risk buildings (**see Section 3.1 for definition**).

### 9.2 Gateway 2 & Gateway 3

9.3 Gateway 2 applies to higher-risk buildings in development before building work starts. We will obtain building control approval from the Building Safety Regulator (BSR), to receive a commencement notice, before we start any relevant building work.

9.4 During construction, between Gateway 2 and Gateway 3, we will ensure we meet our dutyholder requirements as Client and Principal Designer.

9.5 Gateway 3 occurs when building work is complete. We will submit a completion certificate application to the BSR to obtain a completion certificate. The completion certificate will evidence that the BSR is satisfied that our building work complies with building regulations and will enable us to register the higher-risk building for occupation.

### 9.6 Registering occupied, higher-risk buildings

- We will register new higher-risk buildings with the BSR before they become occupied and register existing occupied higher-risk buildings between April 2023 and October 2023. We will adhere to the Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023 which outlines the key information required for registration (building address, height, use, emergency plan, and so on).

### 9.7 Applying for Building Assessment Certificates

- After registering a building, we will apply for a Building Assessment Certificate when instructed to do so by the BSR, within 28 days of the instruction. This process will include uploading key documents and information, including the safety case report, details of our mandatory occurrence reporting system and a copy of our Residents' Engagement Strategy.
- Once we receive the Building Assessment Certificate from the BSR, we will display this in each higher-risk building where it can be seen by residents to

demonstrate to residents that the BSR has assessed our building to be meeting statutory duties. The process of applying for a Building Assessment Certificate is expected to begin in April 2024.

## **9.8 Safety cases**

9.9A safety case is all the information we use to manage the risk of fire spread and the structural safety of our buildings.

9.10 We will develop safety cases for our higher-risk buildings to identify and assess building safety risks and we will take reasonable steps to ensure these risks are reduced and controlled on an ongoing basis. The safety case for each building will set out and evidence how we will ensure that the building is safe. Each safety case will include building information, fire and structural safety measures, the emergency plan and relevant building surveys. This information will be documented and kept up to date within the golden thread.

## **9.11 Safety case reports**

9.12 Safety case reports summarise our safety cases and will show the steps we have taken to identify, assess, remove, reduce, and manage any major fire and structural risks in each of our higher-risk buildings. We will review our safety case reports annually (or more frequently if there is a change to legislation or guidance) and store them on the Cadre system.

## **9.13 Building safety risk assessment**

We will undertake a building safety risk assessment, included within our safety case report, which identifies how fire spread and structural safety incidents can happen and the measures in place to prevent them or reduce their severity. This risk assessment will cover worst-case scenario planning and will demonstrate:

- the types of measures we have taken;
- the reasons we have taken these measures; and
- how they work and how we have, or will, deliver them.

## **9.14 Safety Management System (SMS)**

9.15 An SMS is a formal framework that can help to manage building safety risks. We will implement a building SMS in line with BS 9997 that will provide assurance that all the measures we have implemented for managing fire and building safety are working together effectively. Our SMS includes organisational structure, responsibilities, procedures and performance management. An overview of our SMS will be documented in the safety case reports.

## **9.16 Golden thread of information**

9.17 We will ensure we meet the golden thread of information requirements for each building. The golden thread is:

- Information about a building that allows someone to understand the building and the steps needed to keep both the building and people safe, now and in the future.
- Information management that ensures this information is accurate, easily understandable, can be accessed by those who need it and is up to date.
- Information and data that must be updated throughout the design, construction and occupation stages of a building's lifecycle.

9.18 We will formally document our approach to meeting golden thread requirements by 01/10/2023.

### **9.19 Mandatory occurrence reporting system**

9.20 Dutyholders and Accountable Persons are legally required to develop a mandatory occurrence reporting system to capture and report certain fire and structural safety issues, referred to as safety occurrences, to the BSR with 10 calendar days.

9.21 We will introduce a mandatory occurrence reporting system that enables contractors, residents, employees, or any other person in the building to report safety occurrences to the Resident Safety Manager who will then report these to the BSR within 10 calendar days. We will also ensure an internal investigation is conducted.

### **9.22 Residents' Engagement Strategy**

9.23 We will produce a Residents' Engagement Strategy that explains how residents will be involved in making decisions about the management of their building in relation to the risks of fire and structural failure.

9.24 We will take steps to understand the resident profile within our higher-risk buildings to ensure additional measures are put in place if required (for example, if we become aware that a resident would not be able to self-evacuate in a fire emergency).

9.25 We will have regard to the requirements of vulnerable and hard to reach residents. We will share information clearly and transparently and ensure that information is available to residents via regular publications and information on our website.

### **9.26 Complaints procedure**

9.27 We will have a complaints system that ensures residents' safety concerns are heard and dealt with. We will implement a procedure to investigate complaints relating to building safety risks and ensure root cause analysis is undertaken to learn any lessons and reduce the risk of a repeat.

## **10.0 Data and Records**

- 10.1 We will maintain a core asset register of all properties we own or manage held within the Cadre system. Our higher-risk buildings can be identified easily within this system.
- 10.2 We will ensure all applicable property compliance inspection and check dates and records are recorded on Cadre.
- 10.3 We will robustly manage all changes to stock, including property acquisitions and disposals, to ensure that our asset register remains up to date and higher-risk buildings are not omitted from compliance programmes.
- 10.4 We will keep all records and data for higher-risk buildings in line with our document retention policy and will have robust processes and controls in place to maintain appropriate levels of security for all building and fire safety related data.
- 10.5 The above measures will help us to meet the golden thread of information requirements.

## **11.0 Competent persons**

- 11.1 We will adopt the PAS 8673:2022 competence requirements specification to set our standards for employing suitably competent internal staff and upskilling existing staff.
- 11.2 We will adopt the PAS 8671:2022 and PAS 8672:2022 competence framework for Principal Designers and Principal Contractors (respectively) who undertake building and fire safety related work.
- 11.3 The Resident Safety Manager will hold the CIOB Level 6 Diploma in Building Safety Management (or equivalent). If they do not have this already, they will obtain it within 12 months of the approval of this policy.
- 11.4 We will undertake a documented check of contractors and consultants involved in fire and building safety delivery to ensure they hold the relevant qualifications and accreditations upon procurement and then on an annual basis thereafter, in line with BSI Flex 8670:2021 and PAS 8673:2022.

## **12.0 Training**

- 12.1 We will deliver training on this policy and the procedures that support it, including team briefings, building safety awareness training and on the job training for those delivering building safety work, planned maintenance and repair work as part of their daily job. All training undertaken will be formally recorded.

## **13.0 Performance Reporting**

- 13.1 We will report on key performance indicators which will be provided to the Executive Team monthly and to the Board on a quarterly basis. We will report:
- The number of higher-risk buildings being developed as part of new build schemes.

- The number of occupied higher-risk buildings we own and manage.
- Safety occurrences (as part of our mandatory occurrence reporting system).
- Compliance with each of our specific Accountable Person duties.
- Compliance with the 'big six' safety areas (gas, electric, fire, asbestos, water and lifts).
- Details of any compliance or enforcement notices from the Building Safety Regulator, Fire and Rescue Service or other enforcement body; this will include any formal requests for information made as part of any investigation to ascertain whether there has been a potential breach of our obligations.
- RIDDOR notifications to the Health and Safety Executive with regards to fire and building safety, where these do not fall within scope of mandatory occurrence reporting requirements.

13.2 We will also develop a series of building safety management indicators which will be monitored by the Resident Safety Manager and reported monthly to EMG. Indicators will include measuring that key documents remain in date (such as safety case reports and Residents' Engagement Strategies) and checks and inspections are delivered on time. Management indicators will also monitor property fires and block inspections, and that Planning Gateway duties are complied with for buildings which are in design or construction.

#### **14.0 Quality assurance**

14.1 We will ensure there is a programme of internal quality assurance audits of building safety activity including fieldwork inspections and desktop exercises. This will be done using sample percentages or based on the type of work or activity undertaken and associated risk.

14.2 We will carry out an independent internal audit of building safety at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify any non-compliance issues for correction.

#### **15.0 Material non-compliance and escalation**

15.1 Our definition of material non-compliance is: any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures. All material non-compliance issues will be reported and escalated as soon as possible and no later than 24 hours after the incident occurred or becoming aware of it.

15.2 Any building safety non-compliance issue identified at an operational level will be formally reported to the Resident Safety Manager in the first instance, who will agree an appropriate course of corrective action with the Executive Director of Operations and report details of the same to the Executive Team.

15.3 In cases of serious non-compliance, the Executive Team and Board will consider whether it is necessary to disclose the issue to the Building Safety Regulator under the mandatory occurrence reporting framework, Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

## 16.0 Additional legislation and policy direction

16.1 Legislation - This policy also operates within the context of the following legislation:

- Building Act 1984
- Building Regulations 2010
- Building Safety (Leaseholder Protections) (England) Regulations 2022
- Building Safety (Leaseholder Protections) (Information etc.) (England) Regulations 2022
- Construction (Design and Management) Regulations 2015
- Construction Products (Amendment) Regulations 2022
- Defective Premises Act 1972
- Fire Safety Act 2021
- Fire Safety (England) Regulations 2022
- Health and Safety at Work Act 1974
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Housing Act 2004
- Landlord and Tenant Act 1985, as amended by the Homes (Fitness for Human Habitation) Act 2018
- Management of Health and Safety at Work Regulations 1999
- Regulatory Reform (Fire Safety) Order 2005
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

16.2 Policy direction – The following documents set out direction for landlords, and whilst not statutory guidance or approved legislation, contain recommendations or proposals applicable to this policy:

- Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report (May 2018).
- Building a Safer Future - Proposals for reform of the building safety regulatory system: A consultation (June 2019).
- Grenfell Tower Inquiry: phase 1 report. Volume 1 – 4 (October 2019).
- The Regulatory Reform (Fire Safety) Order 2005: Call for Evidence (July 2019), and summary of responses (March 2020).

<b>The Wrekin</b> Housing Group	<b>Policy control sheet</b> <b>Building Safety Policy</b> <b>Policy reference number - 2023/032</b>
<b>Policy Author</b>	David Hall Head of Property
<b>Direct Lead</b>	David Wells Executive Director of Operational Services
<b>Version</b>	V1.0: September 2023
<b>Target audience</b>	The Wrekin Housing Group Board, Executive, Senior Managers, Employees, Partners and Residents
<b>Consultation</b>	Pennington Choices - Consultants Employee Forum Housing Managers (for the three blocks) Head of Housing Head of Retirement Living Executive Management Group Audit and Assurance Committee
<b>Customer Feedback Summary</b>	Consultation with the customers of the three high-rise blocks in regards to the Residents Engagement Strategies
<b>Date of Equality Impact Assessment</b>	No individuals or groups of people are disadvantaged by the adoption of this policy
<b>Date of Data Privacy Impact Assessment</b>	No personal data is processed as a result of the adoption of this policy
<b>Approving Body</b>	The Wrekin Housing Group Board
<b>Date of final approval</b>	September 2023
<b>Implementation date</b>	September 2023
<b>Review date</b>	March 2026 (Interim Review Sept 2025)
<b>Expiry date</b>	September 2026
<b>Review cycle</b>	Three Year Review Cycle
<b>Policy category</b>	Health and Safety
<b>Associated policies and procedures</b>	<ul style="list-style-type: none"> <li>• Corporate Health and Safety Policy</li> <li>• Fire Safety Policy</li> <li>• Residents' Engagement Strategy</li> <li>• Residents' Complaints Procedure</li> <li>• Mandatory Occurrence Reporting System</li> <li>• Golden Thread Management System</li> <li>• Development Procedures</li> <li>• Building Safety Training Matrix</li> <li>• Compliance policies (for gas, electric, asbestos, water, lifts)</li> </ul>
<b>Policy location</b>	SharePoint Wrekin Housing Group website

### Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
David Hall Head of Property	New Policy	V1.0: September 2023	Executive Management Team – 2 <sup>nd</sup> May 2023 Audit and Assurance Committee – May 2023 The Wrekin Housing Group Board – September 2023