



# Building Safety Policy





## 1.0 Introduction


- 1.1 Housing Plus Group ["HPG"] is dedicated to providing safe, well-maintained homes and environments for all residents, employees, contractors, and visitors. In response to the requirements of the Building Safety Act 2022, the Fire Safety (England) Regulations 2022, and aligned with the Health and Safety at Work Act 1974, HPG has developed this Building Safety Policy to define our strategic, operational, and compliance approach to building safety.
- 1.2 This policy supports our commitment to sector-leading standards in compliance and safety, ensuring we maintain safe homes and communities across our portfolio, particularly in high-rise residential buildings that fall within the statutory definition of Higher-Risk Buildings ["HRB's"].
- 1.3 This document serves as a reference for all HPG employees, partners, contractors, stakeholders, and residents, clearly outlining responsibilities, procedures, and governance mechanisms that ensure legal, regulatory, and moral obligations are met.

## 2.0 Policy Statement

- 2.1 HPG recognises and embraces its responsibilities as a social landlord, asset owner, and employer under prevailing building safety legislation and regulations. We are committed to preventing and mitigating risks of fire and structural failure in our buildings and ensuring compliance with all relevant laws and best practice guidance.
- 2.2 We will meet our duties under the Building Safety Act 2022, ensuring that all HRBs are registered with the Building Safety Regulator ["BSR"], that all safety cases are developed and maintained, and that resident engagement strategies are implemented effectively.
- 2.3 HPG will maintain a proactive and accountable safety culture, operate effective information management through a compliant "Golden Thread" framework, and provide visible assurance to regulators and residents that safety is our priority.

## 3.0 Policy Scope


- 3.1 This policy applies to all buildings owned or managed by HPG that fall within the scope of the Building Safety Act 2022, specifically Higher-Risk Buildings defined as:
  - 3.1.1 Residential buildings that are 18 metres or more in height; or
  - 3.1.2 Residential buildings of at least seven storeys; and
  - 3.1.3 Containing two or more residential units.
- 3.2 This policy also applies to employees, contractors, residents, leaseholders, service providers, and any persons who work in or are affected by activities in



our HRBs. Additionally, this policy informs the management of non-residential communal areas and any associated external structures where safety responsibilities are applicable.


## 4.0 Definitions

- 4.1 **Building Safety Act 2022:** UK legislation introduced to reform the building safety system, with particular focus on higher-risk residential buildings.
- 4.2 **Higher-Risk Building [“HRB”]:** Any residential building that is at least 18 metres in height or has at least seven storeys and contains two or more residential units.
- 4.3 **Principal Accountable Person [“PAP”]:** The individual or organisation with legal responsibility for ensuring that fire and structural risks in HRBs are effectively managed.
- 4.4 **Accountable Person:** Any party responsible for the repair or maintenance of common parts of an HRB who must cooperate with the PAP.
- 4.5 **Building Safety Regulator [“BSR”]:** The regulatory authority established under the Building Safety Act to oversee building safety in England. The BSR operates within the Health and Safety Executive [“HSE”].
- 4.6 **Safety Case:** A documented body of evidence that demonstrates the effective identification, mitigation, and ongoing management of fire and structural risks in HRBs.
- 4.7 **Safety Case Report:** A summary of the safety case provided to the BSR as part of the certification process.
- 4.8 **Golden Thread:** A live and secure digital record of building safety information maintained throughout the lifecycle of the building.
- 4.9 **Mandatory Occurrence Reporting:** A legal requirement for PAPs and dutyholders to report specified safety incidents to the BSR within 10 calendar days.
- 4.10 **Fire Risk Assessment [“FRA”]:** A systematic evaluation of fire hazards and risks within a building and recommendations for mitigation.
- 4.11 **Fire Risk Assessment of External Walls [“FRAEW”]:** A specialised assessment focused on the safety and compliance of external wall systems, including cladding and balconies.

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- 4.12 **Resident Engagement Strategy:** A formal plan that outlines how residents will be involved in the building safety management of HRBs.

## 5.0 Roles and Responsibilities

- 5.1 **Board and Audit and Assurance Committee:** Provide strategic oversight and seek assurance on building safety compliance. Approve the policy and monitor compliance via performance reporting.
- 5.2 **Executive Management Team (EMT):** Ensure strategic direction, resources, and leadership are in place for effective building safety delivery. Escalate and resolve significant compliance issues.
- 5.3 **Executive Director of Investment of Growth:** Holds organisational accountability for building safety compliance, reporting into EMT and the Board. Leads cross-functional collaboration with asset, housing, and health and safety teams.
- 5.4 **[Director-Level Role – TBC]:** Responsible for the implementation of the building safety policy and oversight of delivery programmes, risk assessments, and statutory returns.
- 5.5 **[Head of Service – Building Safety or Compliance]:** Provides operational and tactical leadership on building safety. Oversees programme delivery, remedial action programmes, audit schedules, and contractor performance.
- 5.6 **[Building Safety Officers / Compliance Officers]:** Conduct operational building safety tasks including inspections, data validation, contractor management, and monitoring of remedial works.
- 5.7 **[Repairs/Property Services Teams]:** Support the implementation of building safety-related maintenance and remedial actions across HPG's property portfolio.
- 5.8 **All Staff and Contractors:** Have a duty to report building safety concerns or defects, follow building safety procedures, and contribute to a positive building safety culture.
- 5.9 **Residents and Leaseholders:** Expected to comply with relevant building safety instructions, report hazards, and allow access for inspections and works as required.
- 5.10 Where HPG shares responsibility for building safety with other duty holders (e.g. managing agents, freeholders, leaseholders), it will seek to




establish clear lines of responsibility, share relevant building safety information, and coordinate compliance actions in accordance with regulatory duties.

## 6.0 Ownership, Review, and Approval

- 6.1 **Policy Owner:** Director of [placeholder]
- 6.2 **Review Frequency:** Minimum of every three years or more frequently following:
  - 6.2.1 Legal or regulatory change.
  - 6.2.2 Significant incidents or findings.
  - 6.2.3 Organisational restructuring.
- 6.3 **Approval Route:** Executive Management Team followed by sign-off by the Audit and Assurance Committee.

## 7.0 Applicable Legislation and Guidance

- 7.1 Regulatory Reform (Fire Safety) Order 2005
- 7.2 Fire Safety Act 2021
- 7.3 Fire Safety (England) Regulations 2022
- 7.4 Building Safety Act 2022
- 7.5 Housing Act 2004 (Housing Health and Safety Rating System - HHSRS)
- 7.6 The Social Housing (Regulation) Act 2023
- 7.7 Construction (Design and Management) Regulations 2015
- 7.8 The Building Regulations 2010 and associated Approved Documents (A to S)
- 7.9 The Control of Substances Hazardous to Health Regulations (COSHH) 2002
- 7.10 The Management of Health and Safety at Work Regulations 1999
- 7.11 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- 7.12 Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023
- 7.13 Higher-Risk Buildings (Key Building Information etc.) (England) Regulations 2023
- 7.14 Construction Products (Amendment) Regulations 2022
- 7.15 BS 9997:2019 – Fire Risk Management Systems
- 7.16 BS 9991:2015 – Fire Safety in Residential Buildings
- 7.17 BS EN 13501 – Fire Classification of Construction Products
- 7.18 ISO 45001:2018 – Occupational Health and Safety Management Systems
- 7.19 PAS 9980:2022 – Fire Risk Appraisal of External Wall Construction
- 7.20 PAS 8671:2022 – Competence Requirements for Principal Designers
- 7.21 PAS 8672:2022 – Competence Requirements for Principal Contractors
- 7.22 PAS 8673:2022 – Competence Requirements for the Management of Safety in Residential Buildings
- 7.23 BSI Flex 8670:2021 – Core Criteria for Building Safety Competence

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- 7.24 Building a Safer Future – Independent Review by Dame Judith Hackitt (2018)
  - 7.25 MHCLG Consolidated Advice Notes and Guidance
  - 7.26 National Fire Chiefs Council (NFCC) Guidance and Position Statements
  - 7.27 Grenfell Tower Inquiry: Phase 1 and 2 Reports
  - 7.28 Regulator of Social Housing: Home Standard and Tenant Satisfaction Measures
  - 7.29 HSE's HSG65: Managing for Health and Safety

## 8.0 Policy Delivery Programme

- 8.1 To ensure robust and consistent delivery of the commitments set out in this policy, HPG has developed a structured Building Safety Delivery Programme.
- 8.2 This programme outlines the operational processes, scheduled activities, and cross-functional collaboration required to maintain compliance and ensure safety outcomes are effectively realised across our higher-risk building portfolio.
- 8.3 The delivery programme is comprised of the following key components:

### 8.3.1 Registration and Certification:


- All HRBs will be registered with the BSR in line with legal deadlines.
- We will ensure Building Assessment Certificates are applied for and maintained for each HRB and are clearly displayed.
- New buildings entering scope will be assessed and registered during their development or upon acquisition.

### 8.3.2 Gateway Compliance:

- HPG will comply with the Gateway approval process (Gateway 1: Planning, Gateway 2: Building Control Approval, Gateway 3: Completion) for all new HRBs.
- Internal controls will ensure all building works requiring these approvals are supported by qualified dutyholders and validated plans.
- The Principal Designer and Principal Contractor will be appointed and monitored in accordance with PAS 8671 and 8672.

### 8.3.3 Building Safety Case Management:

- Safety Cases will be developed and maintained for each HRB, supported by Safety Case Reports submitted to the BSR as required.
- Each safety case will include assessments of fire and structural risk, a review of mitigation measures, and documentation of emergency planning.

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- The Golden Thread will be used to store and update safety case data in real-time.

#### 8.3.4 Inspection and Maintenance Regime:

- Regular FRAs, including FRAEWs, will be carried out at defined intervals.
- Fire door inspections, compartmentation surveys, and checks on lifts, emergency lighting, and smoke ventilation will be delivered in line with regulatory frequencies.
- Issues identified will be tracked to resolution and verified through post-inspection audits.

#### 8.3.5 Incident Management and Reporting:

- A Mandatory Occurrence Reporting system will be implemented to capture and escalate fire and structural incidents in HRBs within the 10-day statutory deadline.
- Internal reporting mechanisms will complement this, ensuring rapid communication and incident resolution.
- All incidents will be recorded, reviewed through root cause analysis, and used to inform future prevention strategies.

#### 8.3.6 Remediation and Improvement Works:


- Defective or non-compliant building features identified through inspections, audits, or resident feedback will be programmed for remediation.
- Where temporary mitigation is required (e.g. waking watch, temporary alarms), these will be rapidly deployed and approved by qualified fire engineers.
- The transition back to permanent evacuation strategies (e.g. 'stay put') will be clearly communicated to residents once works are complete.

#### 8.3.7 Resident Engagement:

- Resident Engagement Strategies will be tailored for each HRB, incorporating tenant satisfaction measures and consultation mechanisms.
- Residents will be invited to participate in safety planning, information sharing, and policy reviews.
- Special attention will be given to the needs of vulnerable or non-English-speaking residents to ensure inclusive engagement.

#### 8.3.8 Contractor and Partner Oversight:

- All contractors will be assessed for competence and capability to deliver building safety work.

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- Contracts will include provisions for quality assurance, documentation control, and incident response.
  - Performance will be reviewed regularly against KPIs and compliance measures.

#### 8.3.9 Monitoring and Continuous Improvement:

- Regular audits, safety drills, and desktop reviews will assess the effectiveness of delivery.
- Lessons learned from incidents and inspections will be embedded into future works.
- A feedback loop between operations, compliance, and governance will ensure continuous improvement.

8.4 The Building Safety Delivery Programme ensures that the requirements of this policy are embedded in day-to-day operations, capital programmes, and strategic planning.


8.5 HPG has established a robust delivery framework to ensure building safety responsibilities are fulfilled. This includes:

- Annual and dynamic development of Building Safety Cases
- Registration and certification of all HRBs
- Gateway compliance during design, construction, and occupation
- Mandatory occurrence reporting
- A structured inspection programme including FRAs, FRAEWs, fire doors, compartmentation, and lift safety
- Use of Primary Authority guidance from Staffordshire Fire & Rescue
- An established works programme for fire door replacement, remedial cladding, and structural reviews
- Regular updates to our Golden Thread database
- Cross-team collaboration with health and safety, housing operations, building safety, and asset management functions.
- Third-party quality assurance audits and benchmarking against sector standards.
- Reporting to EMT and Board on delivery performance, including KPIs, trends, and areas requiring escalation or resource allocation.

### 9.0 **Action Management:**


9.1 Housing Plus Group recognises that building safety compliance relies on the effective resolution of a wide range of actions identified through risk assessments, inspections, audits, and incident reviews. These include both physical remedial works and non-physical management actions. The organisation adopts a comprehensive action management approach that includes:



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- 9.1.1 Triaging and prioritising all actions based on level of risk and required statutory timeframes.
  - 9.1.2 Differentiating between remedial works (e.g. fire door repairs, compartmentation upgrades) and management actions (e.g. updates to evacuation strategies, communication with residents).
  - 9.1.3 Assigning responsibility and due dates for each action in the central compliance system, with clear ownership and progress tracking.
  - 9.1.4 Delivering physical works using both competent external contractors and directly employed, in-house teams, ensuring adherence to relevant industry standards.
  - 9.1.5 Ensuring appropriate quality assurance processes, post-inspections, and validation for completed works.
  - 9.1.6 Recording evidence of completion for both physical and management actions and maintaining a complete audit trail.
  - 9.1.7 Escalating actions that are overdue, obstructed, or unachievable within expected timescales in line with the organisation's risk protocols.
  - 9.1.8 Integrating action delivery with wider planned investment and maintenance programmes wherever possible to maximise efficiency.
  - 9.1.9 Supporting access through resident engagement and coordinated communications.
  - 9.1.10 Monitoring themes, trends, and recurring actions to inform continuous improvement, staff development, and strategic planning.
- 9.2 Building safety management will be informed by occupancy profiles, including the presence of residents with mobility, sensory, or cognitive support needs, to ensure appropriate risk mitigation and communication.

## 10.0 Communication and Notification

- 10.1 Effective communication is central to the success of HPG's building safety strategy. The Group is committed to fostering open, transparent, and consistent dialogue with residents, contractors, employees, regulators, and other stakeholders. Our approach is grounded in the principles of clarity, inclusivity, and proactivity, ensuring that everyone affected by or responsible for building safety understands their roles, responsibilities, and the status of safety-related matters.
- 10.1.1 Resident Communications:
- Residents in Higher-Risk Buildings ["HRBs"] will receive regular, easy-to-understand communications about the safety status of their building, including ongoing maintenance, completed inspections, and planned remediation work.

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- Copies of the Building Assessment Certificate and key safety contact details will be displayed in communal areas of all HRBs.
  - Residents will be notified in advance of all intrusive surveys, FRA reviews, fire door inspections, or any planned works affecting their building.
  - Emergency procedures, including evacuation strategies and PEEPs, will be made available in both printed and digital formats.

10.1.2 Resident Engagement Strategy Implementation:

- A building-specific engagement strategy will be developed for each HRB and reviewed annually. This will define how residents are consulted and involved in decision-making.
- Resident engagement forums, such as meetings or online webinars, will be held periodically to provide updates and receive feedback.
- Translation and interpretation services will be made available for residents with language or accessibility needs.

10.1.3 Digital Communication and Accessibility:

- A dedicated section on the HPG website will provide up-to-date information on building safety, including relevant documents, FAQs, safety case summaries, and engagement updates.
- Safety alerts and maintenance notifications will be delivered through multiple channels such as e-mail, text, or letter, according to the resident's preferred communication method.
- Online portals will allow residents to view inspection schedules, raise concerns, and access key documents.

10.1.4 Internal Communication:

- All staff involved in the management, maintenance, and monitoring of HRBs will receive timely updates through internal communications, briefings, and team meetings.
- A structured escalation process is in place to ensure that serious incidents or non-compliance are promptly reported to senior leadership.
- Policy updates and changes in legislation will be communicated through staff bulletins, management updates, and e-learning modules.

10.1.5 Contractor and Partner Communications:

- Contractors and service providers will be briefed on building-specific safety protocols before commencing work.

- Site inductions, risk assessments, and permit-to-work systems will be reinforced through on-site signage and documentation.
- Lessons learned from incidents or audits will be shared with contractors as part of the continuous improvement process.

#### 10.1.6 Regulatory Notification and Liaison:

- HPG will proactively engage with the BSR, local Fire and Rescue Services, and the HSE.
- All mandatory occurrences will be reported to the BSR within statutory timeframes, accompanied by supporting investigation findings and remedial actions.
- Requests for information or inspections by external regulators will be managed transparently, and outcomes shared internally and externally as appropriate.


10.2 Through this multi-layered approach to communication and notification, HPG ensures that building safety remains a visible, collaborative, and accountable part of how we manage our housing stock.

## 11.0 **Data Management and Record Keeping**

11.1 Housing Plus Group uses the organisation's CADRE system as its central repository for all building safety documentation, compliance data, and reporting outputs. CADRE supports integration with other asset and compliance domains, facilitates auditability, and ensures that all records are maintained in a secure, structured, and accessible environment.

11.2 Housing Plus Group recognises the importance of accurate, secure, and accessible data in the effective management of building safety. The organisation is committed to robust data governance and compliance with regulatory expectations in relation to the collection, storage, and use of fire safety records. The approach includes:


- 11.2.1 Maintaining a centralised compliance database to record and track all building safety assets, inspections, assessments, and remedial actions.
- 11.2.2 Storing up-to-date records of FRAs, fire door inspections, maintenance logs, evacuation strategies, and other building safety documentation.
- 11.2.3 Ensuring that records are retained in accordance with statutory timeframes and organisational policy, including for audit and legal defence purposes.
- 11.2.4 Regularly reviewing and validating data to confirm accuracy, completeness, and timeliness.
- 11.2.5 Restricting access to building safety data to authorised personnel only, with audit trails and version control in place.

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- 11.2.6 Supporting transparency by ensuring appropriate information is accessible to residents, contractors, regulators, and internal stakeholders.
  - 11.2.7 Enabling data integration with other compliance domains such as asbestos, electrical safety, and building safety to provide a holistic view of risk.
  - 11.2.8 Providing structured reporting to the Executive Management Team and Board, including performance trends, exceptions, and non-compliance.
  - 11.2.9 Incorporating data insights into strategic decision-making, investment planning, and resident engagement activities.
- 11.3 This approach ensures that Housing Plus Group has full visibility and traceability of its building safety compliance position, and can evidence compliance to both internal and external assurance bodies.

## 12.0 Resident and Stakeholder Engagement

- 12.1 Housing Plus Group is committed to placing residents at the heart of building safety. Engagement with residents and other key stakeholders is critical to ensuring understanding, trust, and cooperation in managing building risks. We will create meaningful opportunities for residents to participate in safety decision-making processes and ensure they feel informed, respected, and supported.
- 12.2 **Principles of Engagement:** Our engagement framework is guided by the following principles:
- 12.2.1 **Transparency:** Provide honest, timely, and accurate information.
  - 12.2.2 **Inclusivity:** Ensure engagement activities are accessible to all residents, including those with disabilities, language barriers, or limited digital access.
  - 12.2.3 **Empowerment:** Equip residents with the knowledge and tools to contribute effectively to building safety decisions.
  - 12.2.4 **Accountability:** Act on feedback received and report back on actions taken.
- 12.3 **Building-Specific Engagement Strategies:**
- 12.3.1 Each HRB will have a tailored resident engagement strategy informed by demographics, risk profile, and community needs.
  - 12.3.2 Strategies will include a communications plan, calendar of engagement activities, key contacts, and mechanisms for collecting and responding to feedback.
  - 12.3.3 Engagement plans will be reviewed annually or following significant incidents or regulatory changes.

12.4 **Consultation and Participation Mechanisms:**

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- 12.4.1 Formal resident panels or advisory groups may be established to guide and inform the delivery of safety programmes.
  - 12.4.2 HPG will consult residents on material safety-related decisions, including major works, changes to evacuation strategies, and introduction of new technologies or systems.
  - 12.4.3 Surveys, online portals, in-person meetings, and written correspondence will be used to gather views.

## **12.5 Vulnerable and Hard-to-Reach Groups:**

- 12.5.1 Engagement strategies will consider the needs of vulnerable residents, including those with cognitive or physical disabilities, older people, children, and those experiencing social isolation.
- 12.5.2 Reasonable adjustments will be made to ensure full participation, including offering alternative formats, home visits, or use of advocates or carers.
- 12.5.3 We will work with local services and voluntary groups to reach residents who may not engage through conventional means.

## **12.6 Leaseholders and Shared Owners:**


- 12.6.1 Engagement will extend to leaseholders and shared owners, ensuring they understand their responsibilities and have input into building safety plans.
- 12.6.2 Specific information will be provided around Section 20 consultations, insurance, and financial contributions related to safety measures.
- 12.6.3 Leaseholder forums may be convened for high-impact developments.

## **12.7 Stakeholder Coordination:**

- 12.7.1 HPG will collaborate with local authorities, fire and rescue services, health agencies, and regulatory bodies to ensure a consistent and joined-up approach to building safety.
- 12.7.2 Where buildings are managed jointly with other landlords or managing agents, shared engagement protocols will be agreed.
- 12.7.3 Contractors and consultants will be briefed on resident sensitivities and required to follow agreed engagement principles.

## **12.8 Feedback and Continuous Improvement:**

- 12.8.1 All feedback from residents will be recorded, analysed, and incorporated into continuous improvement plans.
- 12.8.2 Trends in resident concerns will inform future risk assessments, inspection priorities, and investment programmes.



12.8.3 Resident satisfaction with engagement will be monitored through periodic surveys and built into our performance KPIs.

12.9 This approach to resident and stakeholder engagement reflects HPG's core values and its statutory duty to engage meaningfully under the Building Safety Act 2022.

12.10 We will involve residents in shaping building safety approaches by:

- 12.10.1 Tailoring engagement strategies to the needs of each HRB.
- 12.10.2 Consulting on safety decisions and remediation plans.
- 12.10.3 Incorporating feedback into safety cases and policy reviews.
- 12.10.4 Ensuring inclusivity for vulnerable and hard-to-reach groups.
- 12.10.5 Partnering with external agencies, fire services, and leaseholders for holistic communication.

## 13.0 Competency and Training


13.1 Housing Plus Group (HPG) recognises that the competence of individuals involved in fire and structural safety is fundamental to ensuring compliance, reducing risk, and protecting residents. In line with the Regulatory Reform (Fire Safety) Order 2005, the Fire Safety (England) Regulations 2022, and the Building Safety Act 2022, HPG is committed to ensuring that all persons with safety responsibilities are demonstrably competent and supported through ongoing development.

### 13.2 Core Principles:

- 13.2.1 HPG will ensure that all staff involved in fire and structural safety management, inspections, assessments, or works possess the appropriate knowledge, skills, experience, and behaviours relevant to their role.
- 13.2.2 Competency will be assessed and maintained in accordance with recognised standards, including PAS 79, BSI Flex 8670, and guidance from the National Fire Chiefs Council (NFCC) and Building Safety Regulator (BSR).

### 13.3 Training and Development:

- 13.3.1 All relevant staff will receive fire and structural safety awareness training:
  - At induction
  - When transitioning to a new role or service area
  - Following significant changes in legislation, policy, or building risk.
- 13.3.2 A training matrix will be maintained, detailing mandatory training by role, refresher intervals, and any certification or accreditation requirements.



13.3.3 Role-specific training will be delivered to housing officers, property operatives, compliance staff, customer contact teams, and scheme-based employees.

13.3.4 Regular awareness sessions will be provided to all staff and contractors, reinforcing legal duties, internal procedures, and reporting mechanisms.

**13.4 Contractor and Consultant Competence:**

13.4.1 All contractors and consultants appointed to deliver fire or structural safety services must:

- Demonstrate relevant third-party accreditation (e.g. BAFE, FRACS)
- Hold qualifications aligned with PAS 79, BSI Flex 8670, and professional bodies such as the Institute of Fire Engineers (IFE)

13.4.2 Be assessed for competence as part of the procurement process, which will include appropriate weighting for technical capability, certification, and sector-specific experience.

**13.5 Operational Competence:**

13.5.1 Directly employed operatives undertaking fire or structural safety works (e.g. fire door maintenance, fire stopping, structural inspections) must be trained and assessed as competent in line with current regulations and internal procedures.

13.5.2 HPG will ensure that the identity, qualifications, and accreditation of individuals or organisations conducting Fire Risk Assessments or structural safety assessments are recorded and made available to residents, in accordance with Section 156 of the Building Safety Act 2022.


**13.6 Accountable Person Responsibilities:**

13.6.1 In accordance with the Building Safety Act 2022, HPG acknowledges its role as a Principal Accountable Person (PAP), with legal duties to manage and mitigate both fire and structural safety risks in HRBs.

13.6.2 HPG will ensure that:

- All APs and PAPs are competent and supported to fulfil their statutory duties;
- Structural safety risks are assessed, managed, and recorded in line with the Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023;
- Competency frameworks are in place for those responsible for maintaining the structure and exterior of buildings, including common parts such as stairwells, corridors, and external walls;



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- The Golden Thread of information is maintained, ensuring that safety-critical information is accurate, up to date, and accessible to those who need it.

### 13.7 Assurance and Continuous Improvement:


- 13.7.1 All training will be recorded within the organisation's Learning and Development system, with reporting aligned to internal assurance frameworks.
- 13.7.2 HPG will support Continuing Professional Development ["CPD"] for key personnel with strategic or operational fire and structural safety responsibilities.
- 13.7.3 Competency and training needs will be reviewed following:
  - Safety incidents
  - Internal or external audits
  - Policy or legislative changes

## 14.0 Performance Monitoring

Housing Plus Group is committed to robust performance monitoring to ensure effective oversight of building safety compliance. This enables the organisation to identify emerging risks, assure delivery standards, drive continuous improvement, and fulfil internal and external reporting requirements. The performance monitoring framework includes:

- 14.1 Maintaining a suite of building safety KPIs aligned to statutory obligations, internal targets, and sector benchmarks. These will cover performance across core building safety activities, including but not limited to:
  - 14.1.1 Percentage of HRBs with valid and up-to-date Safety Cases.
  - 14.1.2 Completion rates for Fire Risk Assessments (FRAs), FRAEWs, and remedial actions.
  - 14.1.3 Timeliness and accuracy of Mandatory Occurrence Reporting.
  - 14.1.4 Fire door and compartmentation inspection completion and pass rates.
  - 14.1.5 Number of outstanding high-risk remedial actions by due date.
  - 14.1.6 Resident satisfaction scores related to safety communication and engagement.
  - 14.1.7 Staff and contractor compliance with mandatory training.
  - 14.1.8 Frequency and outcomes of internal and external audits.
- 14.2 Reviewing performance data at operational, tactical, and strategic levels, with oversight provided by the EMT, Audit and Assurance Committee, and Board.
- 14.3 Producing and reviewing monthly and quarterly compliance dashboards to track trends, highlight performance outliers, and inform corrective actions.



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- 14.4 Escalating non-compliance or significant building safety risks through formal governance structures, including the corporate risk register, compliance exception reports, and internal audit reviews.
  - 14.5 Triangulating KPI performance with audit outcomes, resident feedback, incident reports, and lessons learned to gain a holistic view of compliance effectiveness.
  - 14.6 Benchmarking against peer organisations and using insights to strengthen delivery models and policy positions.
  - 14.7 Using CADRE as the central compliance reporting platform to ensure accurate, real-time data capture and auditability across all fire safety domains.
  - 14.8 Ensuring building safety performance data informs investment planning, workforce training, procurement decisions, and wider service improvement programmes.

## 15.0 Quality Assurance


Housing Plus Group (HPG) recognises that robust quality assurance is essential to verifying the effectiveness of its building safety arrangements and maintaining trust with residents, regulators, and the wider public. In accordance with the Building Safety Act 2022, HPG has established a structured quality assurance framework to ensure that all policies, procedures, and works—particularly those relating to fire and structural safety—are delivered to a consistently high standard and in full compliance with statutory duties.

### 15.1 Assurance of Fire and Structural Safety:

- 15.1.1 Independent quality assurance audits will be conducted on Fire Risk Assessments (FRAs), remedial actions, inspection programmes, and structural safety assessments.
- 15.1.2 Pre- and post-inspections of fire-related and structural works (e.g. fire door installations, compartmentation upgrades, structural repairs) will be undertaken to verify workmanship, regulatory compliance, and alignment with approved specifications.
- 15.1.3 Fire safety-specific controls such as hot works permits, approved fire stopping systems, and permit-to-work procedures will be enforced for contractors, with compliance monitored through contract management and audit processes.

### 15.2 Documentation and Contractor Oversight:

- 15.2.1 Fire and structural safety documentation, including contractor outputs, will be reviewed for completeness, accuracy, and alignment with current standards and guidance.
- 15.2.2 Competence records and contractor certifications will be validated to ensure that only qualified individuals carry out safety-critical tasks.

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- 15.2.3 Competent third-party specialists will be engaged periodically to conduct assurance reviews and benchmarking exercises.

### **15.3 Internal Audit and Continuous Improvement:**

- 15.3.1 Internal audit cycles will cover key compliance areas, including fire and structural safety, with findings escalated and tracked through the corporate assurance framework.
- 15.3.2 Learning from incidents, complaints, and regulatory inspections will be captured and used to inform continuous improvement across all safety functions.

### **15.4 Strategic Engagement and Regulatory Alignment:**


- 15.4.1 HPG will maintain strategic engagement with its nominated Primary Authority Fire and Rescue Service to support consistent interpretation of fire safety duties and regulatory alignment.
- 15.4.2 Quality assurance checkpoints will be embedded in the delivery process for capital projects and major works programmes involving fire or structural safety components.

### **15.5 Responsibilities under the Building Safety Act 2022:**

- 15.5.1 As a PAP, HPG acknowledges its legal duty to manage and mitigate both fire and structural safety risks in higher-risk residential buildings
- 15.5.2 Quality assurance processes will support the AP/PAP in:
- 15.5.3 Ensuring the building is registered with the BSR
- 15.5.4 Maintaining the Golden Thread of information, ensuring safety-critical data is accurate, up to date, and accessible
- 15.5.5 Demonstrating organisational capability and individual competence in managing building safety risks
- 15.5.6 Ensuring that safety duties cannot be delegated, and that accountability remains with the AP/PAP


## **16.0 Non-Compliance and Escalation**


- 16.1 Housing Plus Group has established a defined escalation protocol to address any non-compliance with fire safety requirements. This ensures that overdue inspections, unresolved actions, or breaches of statutory duty are promptly addressed and monitored at senior levels.
- 16.2 Any overdue or failed building safety inspections, assessments, or statutory checks will be flagged within the CADRE compliance system.
- 16.3 If a building safety inspection, action, or remedial work is not completed within the required timeframes, this will be recorded and highlighted in



CADRE. Where unresolved after 24 hours, the following escalation process will be triggered:

- 16.3.1 **Step 1:** Escalation to the relevant Head of Service for fire safety or compliance.
  - 16.3.2 **Step 2:** If not resolved, escalation to the Director of [placeholder].
  - 16.3.3 **Step 3:** If still unresolved, escalation to the Executive Director of Investment and Growth.
  - 16.3.4 **Step 4:** Immediate notification to the Executive Management Team where a systemic risk, legal breach, or serious safety concern is identified.
- 16.4 This structured approach ensures that significant compliance risks related to building safety are escalated in a timely manner and addressed by appropriate levels of governance.
- 16.5 Serious breaches, such as failure to complete Fire Risk Assessments for high-risk buildings or unresolved high-priority remedial actions, will be reported to EMT and the Audit and Assurance Committee without delay.
- 16.6 All non-compliance events will be tracked, documented, and reviewed to support learning, accountability, and continuous improvement.



	Policy Control Sheet X Policy Policy reference number - 2025/
Policy Author	
Direct Lead	
Version	
Target audience	
Consultation	HPG customer consultation Employee group / managers - Senior Managers – Executive Management Group – X Committee
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy <state if this is the case and the date that the EIA was completed>.
Date of Data Privacy Impact Assessment	State if one is not required or the date of completion.
Approving Body	
Date of final approval	
Implementation date	
Monitoring arrangements	
Reporting	
Review date	
Expiry date	
Review cycle	
Policy category	
Associated policies and procedures	
Policy location	SharePoint HPG Hub Housing Plus Group website

#### Summary of changes table

Revision history			
Author	Summary changes	of Version	Authorised by & date

