

# **BUILDING SAFETY STRATEGY 2024/2028**

**HARINGEY COUNCIL HOUSING STOCK**

***FINAL DRAFT***

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## **1. Introduction**

### **1.1 Aims of the Building Safety Strategy**

This document sets out the Council's Building Safety Strategy for its High-Rise Residential Buildings (HRRBs), with detailed targets and outcomes covering the period 2024 to 2028. Due to the introduction of the Building Safety Act in 2022, this is the first Building Safety

Strategy which has been developed to ensure the Council is fully compliant with the requirements of the Building Safety Act (2022), the Fire Safety Act (2021), the Social Housing (Regulation) Act 2023, and other legislative and regulatory changes introduced and proposed following the Grenfell tragedy in 2017.

The strategy details how we will ensure that buildings that are in the scope of the legislation are effectively managed, and our residents kept safe. It will be supported by several related individual policies and procedures, which are already in place, or are being developed and regularly updated. The strategy picks up on and takes forward the work already undertaken as part of the Haringey Managing Building Safety Programme, which, since 2021, has been implementing measures in response to, and in preparation for, the regulatory framework requirements.

## **1.2 Scope of the Building Safety Strategy**

The strategy applies to all Haringey Council employees and is applicable to all Council owned high-rise residential blocks as defined in the Building Safety Act (2022). This currently defines high-rise (also referred to as higher risk) buildings as those of 18m+ in height, or 7+ storeys. This includes both tenanted and leasehold stock.

It is anticipated that in future years the buildings that are within the scope of the Act may change (for example to include buildings over 11m+ in height) and this strategy will be reviewed and updated accordingly to ensure it remains fit for purpose.

Based on the current requirements of the Act, this strategy applies to 44 council owned higher-risk residential blocks. (as of April 2024).

## **1.3 Principles of the Building Safety Strategy**

The key drivers for the delivery of the strategy are:

- To ensure the safety of residents living in the Council's High Rise Residential Buildings (HRRBs).
- To ensure full compliance with existing and emerging building safety legislation and regulation; and
- To ensure residents in HRRBs are involved in the decisions concerning the safety (fire and structural) of their homes.

## **1.4 Key Objectives of the Building Safety Strategy**

To achieve the above, we are committed to:

- Improving the effectiveness of existing building compliance management.
- Ensuring clear and transparent monitoring and reporting of KPIs (key performance indicators) to demonstrate compliance.
- Improving the measuring and reporting of tenant satisfaction with the safety of their home.
- Ensuring there are appropriate systems and information management arrangements in place to support delivery of the strategy, in line with the principles of the 'golden thread.'
- Implementing robust quality control systems to ensure end to end assurance.
- Ensuring there is clarity around respective roles, responsibilities, and accountabilities.

- Ensuring responsible staff have the appropriate experience, professional qualifications.
- Implementing and embedding a safety culture across the Council from the senior leadership team to front line staff, residents, and other stakeholders.

## 1.5 Links to Corporate Plans and Strategies

The Building Safety strategy is a key document in supporting theme 5 of the corporate delivery Plan; “A borough where everyone has a safe, sustainable, stable, and affordable home”. As such it is also aligned with the Asset Management Strategy (2023-28,) and objectives of the Housing Strategy (2023-28). It is also aligned with the financial assumptions as set out in the Mid -Term Financial Strategy (2023-28). (see 1.6)

## 1.6 Funding the Strategy

The Housing Revenue Account (HRA) Business Plan/Mid Term Financial Strategy defines the resources available for the management and maintenance of the Council’s housing stock. General Building Safety capital investment related works are included within the £308m major works budget over the next five years. In recognition of new and emerging requirements relating to fire safety, an additional budget of £35m has also been approved for fire and structural safety specific works and surveys over and above the mainstream major works programme as shown in Table 1.6A below.

**Table 1.6A: 5 - Year HRA Capital Programme 2024-29**

Housing Revenue Account (HRA)	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Investment & Financing	2024-25	2025-26	2026-27	2027-28	2028-29	5 Years
	£'000	£'000	£'000	£'000	£'000	£'000
<b>Capital Investment</b>						
Major Works (Haringey Standard)	36,437	45,676	76,682	83,000	66,635	<b>308,430</b>
Carbon Reduction Works (Affordable Energy)	3,503	6,893	11,500	13,533	6,757	<b>42,186</b>
Fire Safety Works	7,879	8,041	8,366	7,460	5,631	<b>37,377</b>
Broadwater Farm Works	16,213	19,713	17,575	16,975	16,974	<b>87,450</b>
<b>Total Existing Stock Investment</b>	<b>64,032</b>	<b>80,323</b>	<b>114,123</b>	<b>120,968</b>	<b>95,997</b>	<b>475,443</b>
New Homes Build Programme	101,926	115,570	107,819	94,156	78,122	<b>497,592</b>
New Homes Acquisitions	33,540	17,395	22,494	14,734	2,658	<b>90,820</b>
High Road West	2,064	19,053	36,644	36,260	11,082	<b>105,104</b>
Broadwater Farm New Build	21,944	56,486	58,565	25,473	5,505	<b>167,972</b>
TA Acquisitions	14,716	14,863	15,309	15,768	16,241	<b>76,897</b>
<b>Total Capital Investment</b>	<b>238,222</b>	<b>303,689</b>	<b>354,954</b>	<b>307,358</b>	<b>209,606</b>	<b>1,413,829</b>

In addition to above capital elements of known Fire & Building safety expenditure, further work is necessary following changes in the Building Safety and Fire Safety regulations.

These are being progressed and have been, or will as appropriate, be subject to suitable business cases and budgeting requirements. The table below shows the current known requirements, and the continued evolvement of the regulatory framework will require ongoing updates in this regard.

**Table 1.6B: - Additional Fire & Building Safety costings (known & estimated) to date for the period of the strategy.**

Item	Cost year 2023/4	Cost year 2024/5	Cost year 2025/6	Cost year 2026/7	Cost year 2027/8	Total	Notes
Building registration with BSR (Building Safety Regulator) @£251 /bldg	£11,044.00	£1,000.00	£1,000.00	£1,000.00	£1,000.00	£4,000	<a href="https://www.hse.gov.uk/building-safety/regulator-charging-scheme-1-october-2023">Building Safety Regulator charging scheme - 1 October 2023 (hse.gov.uk)</a>
Wayfinding Signage Install	£97,947.95	£0.00	£0.00	£0.00	£0.00	£0	Complete
Compliance system Building Safety Module	£0.00	£5,000.00	£2,500.00	£2,500.00	£2,500.00	£12,500	Estimated
Website Development cost TBC	£0.00	£2,000.00	£500.00	£500.00	£500.00	£3,500	Estimated
Resident Engagement Equipment	£0.00	£44,000.00	£10,000.00	£10,000.00	£10,000.00	£74,000	E.G., Post, texting, electronic notice boards etc estimated.
ASCE Safety Case Assurance system	£68,150.00	£28,080.00	£28,080.00	£28,080.00	£28,080.00	£112,320	Annual license fee = support
Structural Risk Surveys	£90,540.00	£79,460.00	£0.00	£0.00	£0.00	£79,460	Tendered rate
Fire Risk Appraisal of External Walls	£0.00	£455,000.00	£918,000.00	£500,000.00	£0.00	£1,873,000	Tendered rate
Qtrly Communal & Annual FED inspections	£507,000.00	£507,000.00	£507,000.00	£507,000.00	£507,000.00	£2,028,000	Tendered rate
Training		£300,000.00	£10,000.00	£10,000.00	£10,000.00	£330,000	Estimated
		Unquantified capital works from surveys -TBC					
	Paid				Total	£4,516,780.00	

## 2 Building Safety Regulatory Framework

### 2.1 The Building Safety Act (2022)

The Building Safety Act (2022) takes forward the government’s commitment to the fundamental reform of building safety. The Act gives effect to policies set out in the ‘Building a Safer Future’ consultation response, published in April 2020. This detailed how the government intended to deliver the principles and recommendations of Dame Judith Hackitt’s Independent Review of Building Regulations and Fire Safety, published in May 2018.

The Act establishes a new building safety regime in England with the introduction of a new Building Safety Regulator and sets out a new legislative framework for the design and construction of new buildings and those undergoing significant refurbishment.

On the 1st of October 2023 The Building Safety Regulator (BSR) also became the Building Control Authority (BCA) for higher risk buildings with the authority to determine the requirements for those who procure, design, plan, manage and undertake building work. New enforcement powers for building control authorities have also been introduced.

The regulator has introduced guidance on the new building control regime “Building Control: An overview of the new regime Gateways 2 and 3 – application to completion certificate.

It’s intended for all who:

- plan to build a new higher-risk building (HRB);
- create one through change of use or alteration / extension; or
- plan to undertake building work to an existing Higher-risk Building (HRB),

The Client (as defined by the Construction Design & Management regulations) responsibilities as well as what the regulator is looking for is outlined in areas such as: -

- Competence declaration
- Building Regulations Compliance Statement
- Fire and Emergency File
- Construction Control Plan
- Change Control Plan
- Mandatory Occurrence Reporting
- Partial completion strategy, where the applicant proposes occupation of part of the building before completion of the HRB work

The regime also covers the main duties of all duty holders including the Client, Principal Designer (PD), Principal contractors (PC), and applies to ALL building work.

Housing Development and Building Safety & Compliance, will work together to develop and update new and suitable procedures to ensure where and as far as reasonably practicable, Haringey's Employer's Requirements, Standards and Specifications are met and that all appropriate data and records are effectively filed and available for future review and information as and when required, in accordance with the requirements of the Golden Thread of Building Information and in accordance with Building and other applicable regulations.

Where this is not possible or practicable e.g., where properties are procured and acquired 'as-built' consideration by the Housing Development, Building Safety and Compliance, Asset and Repairs Teams will consider the impact on future risk and maintenance liabilities at as early a stage as possible within the development and acquisition process.

In addition, the Act establishes a duty holder regime which includes a statutory requirement for a Principal Accountable Person (PAP) to provide a 'Safety Case Report' which demonstrates how occupied residential buildings' safety risks are being identified, mitigated, and managed on an ongoing basis. The Act's principal intention is that there is a whole building approach to safety and that the accountable person considers fire and structural building safety risks and their mitigation.

Under the terms of the Act, individuals within an organisation cannot be the Principal Accountable Person. The organisation i.e., Haringey Council, is the Principal Accountable Person. There is, however, a requirement for someone within the organisation to be the single point of contact on building safety matters.

The Act also introduces the requirement to maintain the 'golden thread' of information throughout the life cycle of in scope buildings. This must also be provided to the Building Safety Regulator at key gateways.

Critically, the Act requires the creation of a Resident Engagement strategy and places a legal obligation on the Principal Accountable Person to ensure residents are involved in the decisions that concern the safety of their building.

## **2.2 The Social Housing (Regulation) Act 2023**

The Act supports and compliments the Building Safety Act in that it legislates to ensure all social housing residents are safe in their home; know how their landlord is performing in relation to building safety, and that their voice is heard. Haringey will through this, and other strategies ensure it complies with the requirements of the Social Housing Regeneration Act.

## **2.3 The Building a Safer Future Charter (2021)**

In her 'Building a Safer Future' report, Dame Judith Hackitt identified the failure of leadership and culture as a key contributing factor to the Grenfell fire. A direct government response led to the formation of the Industry Early Adopters Group, comprised of councils, contractors and building associations who developed the Building a Safer Future Charter. The Charter aims to action positive cultural and behavioural changes across the industry to achieve a safer building system.

The Charter consists of five commitments demonstrating initiatives to protect life by putting safety above all. Commitments are a vital mechanism that makes up the Charter, covering all aspects of building safety attitudes and culture.

- Collaboration for Culture Change
- Transparency for Building Safety
- Putting Safety above Cost
- Putting Residents at the Heart of the Planning Process
- Set Out and Communicate Clear Responsibilities for the Accountable People

Haringey will consider whether it wishes to formally adopt the Charter during the life of this Strategy.

## **2.4 Fire Safety Act (2021) and Fire Safety Regulations (2022)**

The 2002 regulations came into force on 23rd January 2023 and supplemented the duties contained in the Regulatory Reform (Fire Safety) Order 2005. The Act clarifies that the Responsible Persons for multi-occupied residential buildings must manage and reduce the risk of fire for the structure and external walls of the building, including cladding, balconies and windows and entrance doors to individual flats that open into common parts.

The new regulations introduce additional requirements on Responsible Persons, aimed at identifying and communicating fire risk information regarding evacuation procedures to residents in a format they will understand.

Requirements specifically relating to fire safety and the associated regulations will be catered for within our updated fire safety policy, including our approach to Person Centred Fire Risk Assessments (PCFRAS).

Activities to ensure monitoring of the current and new regulations and compliance with them will be tracked through our compliance or other appropriate systems where possible or through spreadsheets where not.

## **3. Meeting the Regulatory Requirements**

### **3.1 Managing Building Safety Programme**

The Council has already put in place and is also developing several measures to meet the requirements of the Building Safety Act (2022) and Fire Safety Act (2021). These measures are being delivered through the Council's Managing Building Safety Programme as outlined within the following six workstreams.

1. Property Data and Information Management – accurate property data is required to enable the Council to effectively manage its property and tenant's homes; drive inspections; carry out compliance activities to improve assurance and comply with statutory obligations. A single source of data will support the 'golden thread' of information.
2. Compliance Management – the provision of an appropriate system to maintain and report on all compliance activities. Maintaining a healthy and safe environment for our residents, staff, contractors, and visitors, through compliance with statute, and best practice, will be achieved through use of appropriate systems, core data, processes, policies and procedures, and skilled personnel.
3. People and Culture - establishing an effective compliance culture that sets the basis of expected behaviour and accountability across the organisation (both staff and residents) will facilitate reductions in building compliance risks and foster the provision of safer homes for our residents. A key component will be the introduction of a programme of training and development for staff to incorporate the levels of competence necessary for the management of building safety in residential buildings.
4. Resident Engagement & Communication – building specific resident engagement will facilitate adherence of occupants to practices that promote the safety of their block. Ensuring a successful communication strategy (internal and external) as necessary for the occupants of buildings in scope of the Act.
5. Building Safety Management (Safety Case and Safety Reports) – will demonstrate and provide reassurance, backed with evidence, that for each building in scope the safety risks relating to the structure and fire are understood, and that suitable and sufficient arrangements are being followed to either prevent or minimise the risk of harm.
6. The Golden Thread of Information - will provide the Council and the Regulator with confidence that a 'single source of truth' exists for each building in scope and that the key building safety information it contains is being securely maintained throughout each building's lifecycle. This will enable the officers responsible for a building to manage it in a way that ensures the safety of residents and those working in the building and surrounding area and to respond in a timely manner to any request for information from third parties such as contractors, residents and the Building Safety Regulator.

### **3.2 Fire Safety Regulations**

Programmes and projects are already in place to ensure that the additional obligations placed on Responsible Persons in relation to 'high rise buildings,' under the new Fire Safety Regulations, are met. These include:

- having a fire door inspection regime in place.
- a customer evacuation strategy.
- provision of wayfinding signage.
- installation and updating of building information to Premises Information Box (PIB) for reference by the London Fire Brigade (LFB).
- regular inspection of firefighting equipment.



A comprehensive matrix of inspection activities is also being developed that will then be tailored to individual buildings and allow a gap analysis to be completed on a building-by-building basis to determine:

- What needs to have a regular inspection.
- That inspections are being carried out and to the correct frequency.
- That they are being appropriately recorded.
- That there are appropriate procedures in place for tracking any follow up actions.
- Whether they need to be carried out by trained or formally competent or certified persons.
- Whether they are they being carried out by in-house or external resources.
- That there is sufficient funding and budgets in place.
- Where there are gaps that we have got plans and strategies to fill them.

#### **4. Procuring for Building Safety**

Building safety works are included in the major works capital programme wherever possible, delivered through new long-term partnering contracts. However, where building safety works are required ahead of, or out of sequence from, the major works programme, they will be delivered through additional programmes which may require procurement of specific contracts and/or specialist or certified skills such as for the installation of fire doors, on a project-by-project basis where required.

When procuring any works to be carried out to a building, the Council will ensure that consideration of the wider implications for that building are given prominence to avoid potential compromising of safety. The Council will also ensure that suitably competent and certified contractors are appointed to carry out all works, in scope, including building safety.

The Council will incorporate government guidance and adopt industry best practice (e.g., 'The Construction Playbook government guidance on sourcing and contracting public works projects and programmes', September 2022), within its procurement processes and in the development of the planned contract partnering arrangements for delivering major works, including building safety, to council homes. See,

Specifically, the Council will follow the Department for Levelling Up, Housing and Communities (DLUHC) guidance document on [Collaborative Procurement for Design and Construction to support building safety](#). (January 2022). This includes adopting the four specific proposals contained within the guidance for collaborative procurement for all in-scope projects:

- Selection by value that avoids a race to the bottom.
- Early supply chain involvement that improves safety and reduces risks.
- Collaborative relationships that improve commitments and involve residents.
- A golden thread of information that integrates design, construction, and operation.

In addition, the South East Consortium (framework provider) has produced procurement guidance relevant to the Building Safety Act and related legislation/regulations.

#### **5. Delivering our objectives**

##### **5.1 Roles and Responsibilities under the Strategy**

The roles and responsibilities for key stakeholders across the Council is detailed below:

- **The Chief Executive** - is responsible for ensuring adequate resources are made available to enable the Council to comply with the requirements of the legislation. The Chief Executive, on behalf of the Council, is the Responsible Person under the Fire Safety Act 2021.
- **The Director of Placemaking and Housing** chairs the Placemaking and Housing Board and will be the senior officer sign-off for cabinet reports, performance data, project and budget spend proposals with clear escalation channels to the Council Senior Leadership Team and Members.
- **The Operational Director for Housing Services and Building Safety/Assistant Directors of Housing & Building Safety**, oversee the critical areas of compliance and building safety and chairs the Building Safety and Compliance Board and will have dedicated oversight and clear escalation channels to the Placemaking and Housing Board. They are also responsible for the overall implementation of this strategy and the development and delivery of the projects detailed within the action plan. They will monitor and track performance to ensure that Haringey remains compliant with current legislative requirements and that projects are on track to ensure the Council is ready for the implementation of future legislation and guidance.
- **The Head of Residential Building Safety** will work closely with all departments across the Council to deliver the requirements of this strategy and to ensure buildings within the scope of the Building Safety Act remain safe. The Head of Residential Building Safety will work directly with Building Safety Managers to ensure the Council meets these legislative requirements. They will also provide regular progress updates to the Building Safety and Compliance Board. Under the requirements of the Building Safety Act, the Head of Residential Building Safety will be Haringey's single point of contact for the Building Safety Regulator.
- **Building Safety Managers (BSMs)** will be allocated several buildings and will manage the day-to-day activities in accordance with the building safety case and provide information as required to the new Building Safety Regulator. They will also support the delivery of this strategy and work to ensure that residents understand how they can get involved in decision-making about the safety of their homes.

## 5.2 Governance and Performance Management

The key monitoring of the strategy will be undertaken by the Building Safety and Compliance Board, chaired by the Operational Director for Housing Services and Building Safety whose role is one of oversight to ensure the strategy and associated action plan targets are delivered through appropriate funding and resources.

Updates will be provided to the Council's Property Compliance Board, and information will also flow between the Housing IT Improvement Board and the Capital Board. Where necessary, reports and information will escalate to the Placemaking and Housing Board, the Executive Leadership Team, and Council Members. Regular reports are also provided to the Resident Voice Board and Residents Advisory Panel as and when required.

There is a suite of KPIs in place for managing compliance, including fire safety, gas, electrical, asbestos, water and lifts, which will be regularly reviewed and adapted to reflect the changing regulatory framework.

This includes a set of KPIs specifically for in scope buildings under the Building Safety Act.

### **5.3 Staff resources**

As part of the preparation for the new Building Safety regulatory framework, the Council appointed a Head of Residential Building Safety, which brought together all compliance and Mechanical and Electrical works activities under one head of service.

The Residential Building Safety and Compliance team is structured to manage the specialist technical areas through Fire and Asbestos managers, a Mechanical and Electrical Services managers, Building Safety managers and Compliance administration & support staff.

The team ensures delivery of all compliance related and other Mechanical and Electrical programmes (e.g., door entry maintenance), through either our in-house risk assessors, repairs and electrical teams or through external specialist contractors and consultants.

### **5.4 Competencies, training, and development**

A key area of the Building Safety Act is to ensure that anyone undertaking works is competent to work in buildings that are in-scope. There will therefore be learning and development requirements for staff to ensure that the relevant qualifications, skills, and experience can be always demonstrated. Further training and qualifications may be required as new guidance and legislation is released. Staff in specific roles may require additional training and qualifications – for example, those responsible for the inspection of fire doors.

A key component will be the introduction a programme of training and development for relevant staff which will be in accordance with 'PAS 8673:2022: Built environment – Competence requirements for the management of safety in residential buildings – Specification.'

In addition, we are embedding a safety culture throughout the Council, given the wider number of staff involved in interacting with residents and delivering maintenance and improvement programmes to in scope buildings.

### **5.5 Resident Engagement and Communication**

The resident voice and resident engagement are key areas of the Building Safety Act and the Social Housing (Regulation) Bill. The Act requires the creation of a Resident Engagement strategy and places a legal obligation on the Principal Accountable Person to ensure residents are involved in the decisions that concern the safety of their building. They will be required to:

- Produce and implement a resident engagement strategy that promotes residents' engagement and involvement in decision-making about safety issues, and
- Establish a complaints system that ensures residents' safety concerns are heard and dealt with.
- Residents will also have the ability to escalate complaints to the Building Safety Regulator.

In addition, residents will be under an obligation to:

- Not act in a way that creates a significant risk of fire or structural failure.
- Not interfere with a relevant safety item.

- Comply with a request by the Principle Accountable Person for information reasonably required to perform their duties to assess and manage building safety risks.

Successful resident engagement is therefore critical to achieving the outcomes which the strategy is designed to achieve.

In Haringey, resident engagement and consultation around the Building Safety Resident Engagement Strategy is being undertaken at two levels. The Council is working with the new Resident Engagement Framework and Customer Core Group at a strategic level in updating and developing the Council's Community Engagement Strategy 2022. This is in addition to the more local specific engagement that will take place with residents in each of the in-scope blocks. This will ensure a building specific Resident Engagement Strategy is produced for each of our high-rise, high-risk buildings. As such a draft Strategy has been produced as a template and model for the remaining high-rise blocks.

The building specific Resident Engagement Strategies are aligned to and adopt the overarching principles of the current Community Engagement Strategy and will be regularly reviewed and adopted for all buildings that fall within the scope of Building Safety Act now or in the future.

The building specific Resident Engagement Strategies will:

- Include how we will share information about building safety with residents.
- Provide a route to enable residents to raise safety concerns formally.
- Include the ability to capture formal and informal feedback.
- Detail the ways in which we will engage with residents and how we will ensure their diverse needs are considered.
- Acknowledge the role of residents and their responsibilities to support safety.

To ensure that prompt and efficient action is taken to resolve, all building safety complaints will be recorded and acknowledged within 24 hrs and assigned to a Building Safety Manager as the principal investigator. All building safety complaint types will be responded to in accordance with the Council's current complaints process and/or prioritised accordingly.

The Resident Engagement Strategies and the Building Safety Strategy will be accessible to residents via our website, or on request, as part of the information that we will make available to residents as defined in the Building Safety Act.

## **5.6 Data Management and Information Systems**

The scope of the 'golden thread' of information must include as-built plans, operations and maintenance documents, health, and safety documents, change management documents, materials documentation, installation certificates and risk assessments, amongst other documents. The expectation is that these records are maintained digitally, be current, relevant and accessible, allowing proper retention, security, and version control to be maintained.

The body of information that constitutes the 'golden thread' should be sufficient to serve as the basis for the Building Safety Case, which must be submitted to the new Building Safety Regulator before they issue a Building Assessment Certificate allowing the building to be occupied.

Effectively implementing the necessary platforms, processes, and systems to comply with the 'golden thread' duties would provide the following benefits:

- A single source of truth and live data – allowing for more effective risk management processes, with live management reports and automatic alerts.
- A comprehensive and up-to-date overview of compliance of the building against other statutory responsibilities.
- A complete and accurate suite of building data that can be used for more effective investment planning.

In recognition that our existing IT systems may not now be suitable to meet the current and future building safety requirements, considering the additional data requirements of the 'golden thread,' the Council have acquired an appropriate compliance management system and is acquiring a suitable asset management system which will enable us to maintain and report on all compliance activities based on a single source of truth for property assets. A set of minimum requirements were established through a specific workstream within the Managing Building Safety programme as set out within the Compliance Management System Outputs Report against which the new compliance system was procured.

In addition to this, and to ensure that the system uses appropriate and up-to-date property data, a data architecture project is also in place to ensure there is as 'single source of truth' and a suitably controlled, master data set. The master data set will ensure that all property movements and tenancy information is updated and validated through robust control mechanisms and this information, in turn, will provide assurance that all 'down-stream' systems such as our asset management and compliance management systems are reconciled appropriately against the most up to date property information.

## **5.7 Risk Management**

As set out at 2.1, the Principal Accountable Person has a duty to submit a safety case report to the Building Safety Regulator, for all high-rise buildings in scope. The safety case report is supported by the wider safety case, which requires detailed information about the building, assessments of building safety risks and measures in place to manage those risks, all contained within the golden thread of information.

Notwithstanding our attention to our data requirements, the other key risks to the strategy being achieved are:

- Insufficient staff resources and skills to deliver its objectives.
- Availability of funding.
- Adverse impact of any further regulatory/legislative changes.
- Low levels of resident engagement.
- Poor contractor performance.

This is in addition to building specific risks which include fire, structural collapse and Housing Health and Safety Rating System (HHSRS) hazards.

The risks of not delivering this strategy are that the Council will not comply with the requirements of the Building Safety Act (2022) and the Fire Safety Act (2021) and other legislation such as the Regulatory Reform (fire Safety) Order 2005 (RRFSO), relevant codes of practice and good practice guidance. This may result in:

- Risk of death or multiple fatalities.

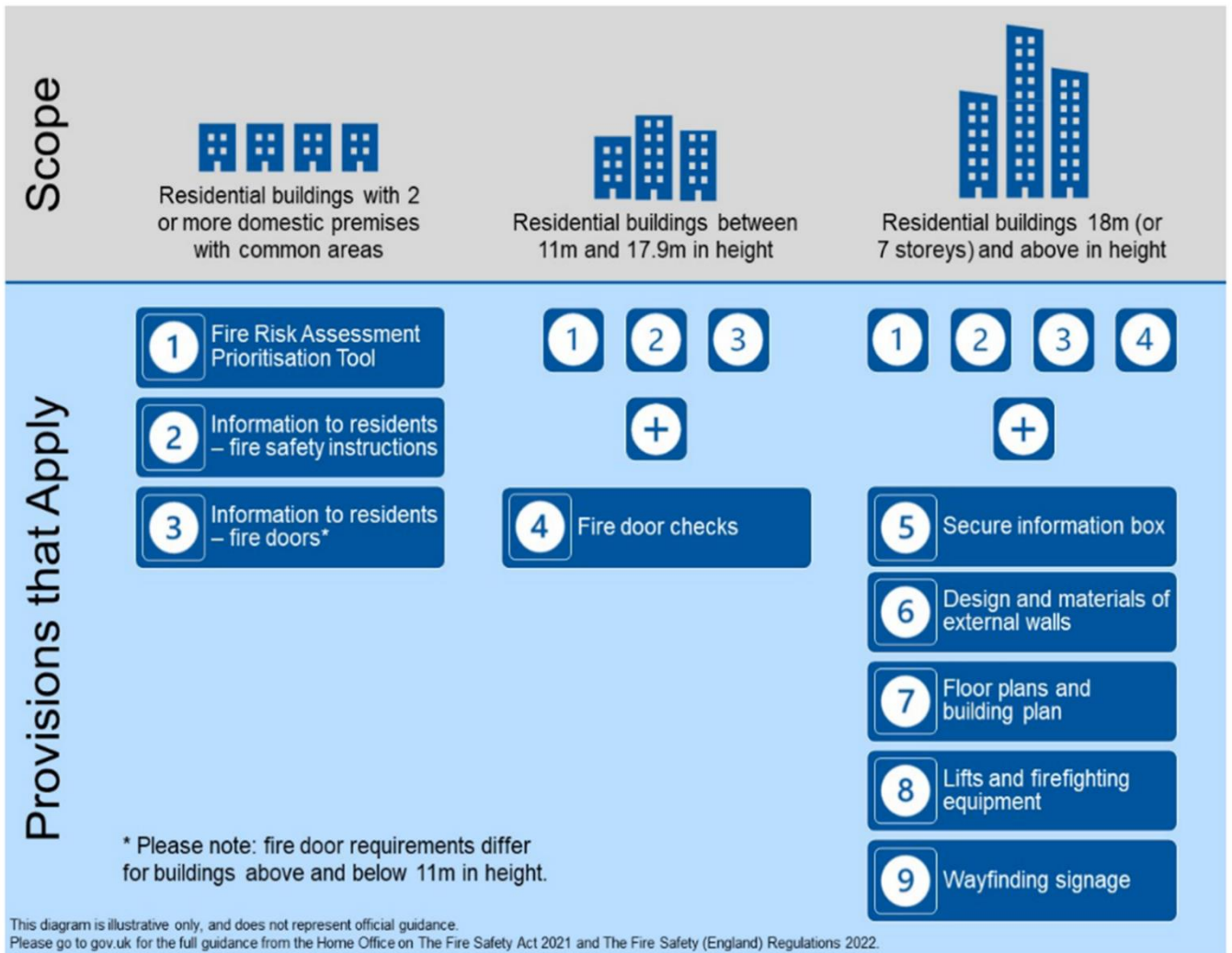
- Prosecution by the Health and Safety Executive under the Health and Safety at Work Act (1974).
- Prosecution by the Fire and Rescue Service under the Building Safety Act (2022), RRFSA and/or Fire Safety Act (2021).
- Prosecution under Corporate Manslaughter and Corporate Homicide Act (2007).
- A judgement of serious detriment by the Regulator of Social Housing.
- Reputational damage.
- Loss of confidence by residents and other stakeholders & partners in the organisation's competence, capacity and credibility to effectively manage residential housing.

## **5.8 Review of the strategy**

The Council will carry out an annual review and update the Building Safety Strategy to make sure that it remains properly aligned to the regulatory requirements. Additional secondary legislation is likely to be forthcoming throughout 2024 and beyond. Therefore, this strategy may need to be amended, as this is released. Residents will be engaged in any review and monitoring of the strategy, through the Customer Core Group who were consulted early-on in developing the strategy.

The updating process will enable us to assess how well we have delivered against the priorities and targets set and identify areas for improvement. It will also enable us to use feedback received from residents and latest best practice developments to ensure our Building Safety Strategy and associated action plan remain fit for purpose.

Appendix 1 National Fire Chiefs Council Summary [Link](#)



## Appendix 2 Glossary

### Glossary of key terms used in this document.

**Access** is defined in Regulation 4(7) of the Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023. It means a doorway, archway, or similar opening. Access which is only used in an emergency or for maintenance is not included. For example, a doorway between two buildings used regularly by residents counts as access, while an emergency exit between two buildings does not. If an exit is used both as an emergency exit and for regular access (for example, a front entrance used for both purposes), it counts as access. Under the Regulations the definition of access is limited to the doorway or opening, it does not include corridors, walkways, or atriums.

An **accountable person** is the duty holder during a higher-risk building's occupation and must meet the statutory duties as set out in Part 4 of the Act. If an occupied higher-risk building has just one accountable person, they will automatically become the principal accountable person for that building. Where there are two or more accountable persons, the one responsible for the repair of the structure and exterior of the building will be the principal accountable person in line with the statutory definition.

**The Building Safety Act 2022** (the Act) was granted Royal Assent on 28 April 2022. It implements the recommendations made in Dame Judith Hackitt's report Building a Safer Future to create a new robust regulatory system for higher-risk buildings. Her recommendations set out clear duties and responsibilities for those who commission, design, construct and refurbish higher-risk buildings, and those who are responsible for making sure that buildings are safely managed when occupied. The Act is available at [Building Safety Act 2022](#).

**The Building Safety Regulator** (the Regulator) is charged with improving the safety and standard of buildings through three critical functions:

- leading the delivery of the new regulatory regime for higher-risk buildings;
- overseeing the safety and standards of all buildings; and
- facilitating improvement in the competence of industry and building inspectors

**Common parts** are defined by section 72(6) of the Building Safety Act 2022. They include the structure and exterior of the building, except so far as included in a demise of a single dwelling or of premises to be occupied for the purposes of a business, or any part of the building provided for the use, benefit and enjoyment of the residents of more than one residential unit.

**The core** is the interior elements of a building which provide access to different parts of the building, such as a stair core or lift shaft.

**Dutyholders** (whether individuals or organisations) fulfil the key roles that are assigned specific responsibilities at particular phases of the building life cycle.

**Higher-risk building** is the technical term for buildings within the scope of the higher-risk regime. This guidance is designed to help users understand whether a building meets the criteria to be considered a higher-risk building.

**Higher-risk building in-occupation** refers to buildings which are in scope of the requirements of Part 4 of the Building Safety Act.



**The Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023** (the Regulations) are Regulations which build on the provisions in the Act to complete the legal definition of higher-risk building. These are available at <https://www.legislation.gov.uk/uksi/2023/275/contents/made>.

**Overall structure** is referred to as wider building in the Regulations. If two or more structures are attached, the overall structure refers to all the attached structures. When a structure is not attached to any other structure, the overall structure means that single structure.

**A plant room** is an area which contains machinery or equipment that provides services to the building.

**A resident** is a person who resides in a residential unit, regardless of tenure.

**A residential unit** is a dwelling or any other unit of living accommodation. Examples are a flat, studio flat, shared accommodation within university halls or a unit within a supported accommodation building.

**Structure** is defined in Regulation 1(3) of the Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023 as a roofed construction with walls.

**Responsible Person** in the context of both the Fire Safety Order and the Fire Safety (England) Regulations.

For all practical purposes, in the case of a block of flats, the Responsible Person will be the person who has control of the premises in connection with carrying on a business. This will, typically, be the freeholder or the managing agents for the block, or, for example, a residents' management company.

The Responsible Person will be an organisation, such as a Council, property company or firm of managing agents (or what, in law, is described as a "legal person").

**Fire Safety Regulations** - The new regulations will improve cooperation and coordination between Responsible Persons (RPs), increase requirements in relation to the recording and sharing of fire safety information, make it easier for enforcement authorities to take action against non-compliance, and ensure residents have access to comprehensive.

**The Housing Revenue Account (HRA)** is intended to record expenditure and income on running a council's own housing stock and closely related services or facilities, which are provided primarily for the benefit of the council's own tenants.

**The safety case report** is a document that summarises a building safety case. It identifies the building's major fire and structural hazards. And it shows how the Council is managing the risks as far as they can.

**A Capital Works Programme** is a list of capital projects (new works, upgrades and renewals) programmed for construction in a given year or years. Capital works are works to the structure and exterior of the flat and building, and to any other premises that the lease grants the right to use - for example, the common areas of the building and estate.

**Building Assessment Certificates** are a crucial tool in executing the new regulatory regime highlighted by the new Building Safety Act. This aims to put into practice new safety measures to increase high-rise buildings' fire safety and reduce the risk of structural failures. After a building is registered, the Building Safety Regulator will ensure that the building's Accountable Persons and Safety Managers are managing the risks relevant to that building and are working to keep all residents safe. The Building Safety Regulator will regularly carry out assessments and, if all standards are met, they will provide a Building Assessment Certificate.