

Building & Fire Safety Policy Statement

1. To ensure, so far as is reasonably practicable, the safety of employees, residents, and other interested parties, Southern Housing recognises and accepts its legal duties under:
 - [Regulatory Reform \(Fire Safety\) Order 2005](#)
 - [Fire Safety Act 2021](#)
 - [Building Safety Act 2022](#)
 - [Building Regulations 2010](#)
 - [Health & Safety at Work etc. Act, 1974](#)
 - [Construction Design and Management Regulations 2015](#)
 - [Social Housing \(Regulation\) Act 2023](#)
 - [Housing Act 2004](#)
 - Secondary legislation.
2. We will strive to operate a building and fire safety management system in line with the principles of BS9997:2019 Fire Risk Management Systems.
3. We will provide safe premises for residents, employees, contractors, and any others likely to be affected by our buildings. We will achieve this through effective leadership and management.
4. All employees are required to assist in discharging these duties by taking reasonable skill and care for their own safety, and that of others who could be affected by anything they do or fail to do.
5. Southern Housing will provide necessary resources for policy implementation and meeting our specific statutory obligations. Executive Director of Asset Management & Sustainability has been appointed as the Executive Director with overall accountability and responsibility for Building & Fire Safety. Specific responsibilities are cascaded down through the line management as detailed in the key roles and responsibilities section of the Building & Fire Safety Policy.
6. This aims of this Policy are:
 - a) Take all reasonable steps to prevent the creation and/or enhancement of a Building Safety Risk¹
 - b) Assess and evaluate Building Safety Risks that are unavoidable, including identifying the proportionate measures required to address, reduce, mitigate and control the risks
 - c) Combat Building Safety Risks at source to address, reduce, mitigate, and control risks at the earliest opportunity
 - d) Ensure suitable and proportionate systems are in place for the effective inspection, testing, and maintenance of the efficacy of measures taken

¹ a 'Building Safety Risk' means a risk to the safety of people in or about a building arising from the spread of fire or structural failure.

- e) Prioritise collective protective measures over individual protective measures
 - f) Where reasonable to do so, replace the dangerous with the non-dangerous or less dangerous
 - g) Wherever practicable take advantage of technical progress in managing Building Safety Risks
 - h) Consider the impacts on residents, engage with residents and provide resident communication via appropriate channels
 - i) Give appropriate instructions, information, and training to employees and persons undertaking works to our buildings
 - j) Develop an effective and sustainable building information management system²
 - k) Ensure any person responsible for or assisting with compliance with a duty in or under [Part 4 of the Building Safety Act 2022](#), the [Regulatory Reform \(Fire Safety\) Order 2005](#), or associated legislation, has the relevant competence and demonstrable experience.
7. Southern Housing, at the highest level, will promote and demonstrate a progressive building safety culture and continuous improvement. We will ensure building safety is an integral element of managing business operations.
8. We'll make this Policy available for all employees and stakeholders and place a copy of this Policy Statement on the appropriate media forms including the website and intranet.
9. Southern Housing will ensure this Policy is carried out through the approval of strategy, policies, process, procedures, and management plans, and by regular monitoring.
10. We'll review this Policy every two years, or sooner if there have been significant changes in legislation or work practices.

Signed: 

Date: 26 February 2026

Paul Hackett, Chief Executive, Southern Housing

² Demonstration of Golden Thread compliance against the [Higher Risk Buildings \(Keeping and Provision of Information etc.\) \(England\) Regulations 2024](#)



Building & Fire Safety Policy

1.0 Purpose and scope

1.1 This Policy outlines how Southern Housing will meet the regulatory framework for Social Housing.

1.2 We will ensure compliance with relevant building and fire safety legislation by:

- Mitigating hazards and risks that may result in fire spread or structural issues in our buildings
- Protecting occupiers of our properties, visitors, colleagues, contractors, and the public, as far as reasonably practicable.

1.3 This Policy outlines key objectives and corporate responsibilities throughout the development and occupation phases of our buildings.

1.4 To the extent that Southern Housing is the Responsible Person³, an Accountable Person, and/or a Principal Accountable Person⁴, we shall comply with the relevant legislative requirements and policies suitable to each role.

1.5 Key principles guiding this Policy and its implementation include:

- We will ensure a robust approach to cooperation and coordination is in place to achieve a 'whole building' risk management approach to fire and building safety
- We will adopt an agile approach, regularly reassessing and reprioritising activities as new risks emerge, taking all practical and reasonable steps and programme activities accordingly.

1.6 The terms 'we', 'our' and 'us' mean Southern Housing.

2.0 Legislation and enforcement

2.1 Southern Housing recognises its statutory duties under the relevant legislation, including (non-exhaustive):

- [Building Safety Act 2022](#) and associated secondary legislation or regulations made by the Secretary of State

³ As defined by [Article 3 of the Regulatory Reform \(Fire Safety\) Order 2005](#).

⁴ As defined by [section 72 and 73 of the Building Safety Act 2022](#).

- [Regulatory Reform \(Fire Safety\) Order 2005](#) (including [Fire Safety Act 2021](#) and [Fire Safety \(England\) Regulations 2022](#))
- [Building Regulations 2010](#)
- [Construction Design and Management Regulations 2015](#)
- [Health & Safety at Work etc. Act, 1974](#)
- [Social Housing \(Regulation\) Act 2023](#)
- [Housing Act 2004](#).

2.2 We will comply with relevant guidance such as HSE Guidance, British Standards, government guidance, and approved documents, taking all practical and reasonable steps.

2.3 Failure to discharge our statutory responsibilities and obligations properly could lead to formal action (i.e. notices and prosecution) by the relevant enforcing body including:

- Fire and Rescue Services
- Building Safety Regulator
- Local Authorities
- Health and Safety Executive.

2.4 All building and fire notices received from the relevant enforcing bodies must be logged, managed, and issued in line with our Enforcement Notices Procedure.

3.0 Policy objectives

3.1 The aims of this Policy are:

- Take all reasonable steps to prevent the creation and/or enhancement of a Building Safety Risk⁵
- Assess and evaluate Building Safety Risks that are unavoidable, including identifying the proportionate measures required to address, reduce, mitigate, and control the risks
- Control Building Safety Risks at source to address, reduce, mitigate, and protect at the earliest opportunity
- Ensure suitable and proportionate systems are in place for the effective inspection, testing, and maintenance of the efficacy of measures taken
- Prioritise collective protective measures over individual protective measures
- Where reasonable to do so, replace the dangerous with the non-dangerous or less dangerous
- Wherever practicable take advantage of technical progress in managing Building Safety Risks
- Consider the impacts on residents, engage with residents and provide resident communication via appropriate channels

⁵ A 'Building Safety Risk' means a risk to the safety of people in or about a building arising from the spread of fire or structural failure.

- Give appropriate instructions and information to employees and persons undertaking works to our buildings
- Develop an effective and sustainable building information management system⁶
- Ensure key persons responsible for or assisting with compliance with a duty in or under [Part 4 of the Building Safety Act 2022](#), the [Regulatory Reform \(Fire Safety\) Order 2005](#), or associated legislation, has the relevant competence and demonstrable experience.

3.2 Performance measures are outlined in [appendix one](#) and [appendix two](#).

4.0 Key roles & responsibilities

4.1 Governance structure

Please see [appendix three](#) for the Building Safety Governance Structure.

4.2 The Board

The Board will provide leadership and direction, creating a robust culture to meet the obligations under relevant building and fire safety legislation by:

- Demonstrating visible and strong leadership and instilling a positive safety culture
- Monitoring targets, monitoring, and reviewing the effectiveness of the Building and Fire Safety Management System
- Setting direction using a risk-based approach
- Ensuring all decisions reflect the commitments prescribed in the Building and Fire Safety Policy.

4.3 Executive Team

The Executive Team will provide leadership and direction, creating a robust building safety culture by ensuring:

- They are familiar with their legal duties in relation to the building and fire safety legislation governing Southern Housing
- That required Building and Fire Safety activities are adequately resourced
- Building and fire safety are an integral part of all relevant business operations
- All related decisions reflect the commitments prescribed in the Policy.

Executive members have specific roles in this Policy as described below.

⁶ Demonstration of Golden Thread compliance against the [Higher Risk Buildings \(Keeping and Provision of Information etc.\) \(England\) Regulations 2024](#).

4.4 Executive Director of Asset Management & Sustainability

4.4.1 The Executive Director of Asset Management & Sustainability (EDAMS) have overall accountability for ensuring:

- Southern Housing meets its duties under building and fire safety legislation in line with this Policy
- Adequate management plans - which are key to outlining specific processes and tasks by colleagues across the business to implement this Policy - are in place.

4.4.2 Key responsibilities are to:

- Ensure the implementation of building and fire safety policies and procedures within their areas of responsibility, so strategic, operational, and building level risks are identified and controlled
- Ensure all building works comply with the relevant legislation and guidance including but not limited to the applicable building regulations
- Implement an Asset Assurance regime that applies to key stages of a building's lifecycle
- Establish a coherent policy and ensure it is compatible with the context and strategic direction of the organisation
- Ensure the requirements of building & fire safety legislation and obligations are set out in relevant contracts/agreements with supply chain partners
- Ensure operatives' and supply chain partners' competence and processes are aligned with our policies and management plans with the aim of not enhancing building risk
- Ensure and demonstrate the Client⁷, Principal Designer, Principal Contractor and any sub-contractors and consultants that fall within the scope of building and fire safety are suitably competent, and contracts are adequately managed
- Maintain suitable and sufficient records to demonstrate compliance with relevant legislation and Building Regulations
- Ensure implementation of applicable activities outlined in the management plans supporting this Policy
- Take accountability for the effectiveness of the building and fire safety risk management system
- Ensure the Southern Housing Board and Executive Team receive regular reports concerning performance and assurance
- Chair the Building Safety Programme Board, which oversees projects to meet the requirements of building and fire safety legislation
- Ensure adequate resources and systems are in place to meet the requirements of Building and Fire Safety Policy, procedures, and legal requirements
- Act on advice from competent persons such as the:

- Director of Building Safety

⁷ Client duties as per [The Building Regulations etc. \(Amendment\) \(England\) Regulations 2023](#)

- Director of Asset Compliance
 - Director of Capital Investment
 - Director of Delivery
 - Director of Health & Safety
 - Health & Safety Executive
 - Building Safety Regulator
 - Regulator of Social Housing
 - Fire & Rescue Services
 - local authorities
 - consultants.
- Collaborate with the Executive Director of Operations and Executive Director of Development to review, develop, or amend policies and related management plans and processes in line with legislation relevant to their areas of responsibility
 - Ensure the Assets & Sustainability directorate work collaboratively to comply with this Policy and their Client duties⁷ under relevant building regulations
 - Seek advice of the Executive Director of Operations before accepting building and fire safety liabilities on third-party managed or owned buildings.

4.5 Executive Director of Development

Key responsibilities include to:

- Ensure Southern Housing meets its duties under building and fire safety legislation for the design, construction, and handover of new development and regeneration projects
- Ensure the implementation of building and fire safety policies and procedures within their areas of responsibility, so strategic, operational, and building-level risks are identified and controlled.
- Ensure our systems of working comply with the duties of the Responsible Person for Fire Safety and Client⁷ during the design, construction, and handover phase, and act as a source of competent advice on building and fire safety
- Establish and maintain a delivery framework that promotes a positive safety culture, and ensures policies and procedures are adhered to by our contractors, consultants, and advisors
- Set minimum standards for new buildings and ensure all building works comply with the relevant legislation and guidance including, but not limited to, applicable Building Regulations
- Ensure the requirements of building and fire safety legislation and obligations set out in relevant contracts/agreements with our clients, partners, subsidiaries, and other interested parties. Ensure they reflect our obligations and meet them throughout the construction, handover, procurement, and design phases.
- Ensure a suitable delivery assurance framework is adhered to throughout the design, construction, and handover phases

- Ensure Building Safety Risks are fully assessed throughout a building's construction and handover phases
- Collaborate with all Directors (specifically the Director of Building Safety, Director of Asset Compliance, Director of Health & Safety) to develop, review, or amend policies relevant to their areas of responsibility
- Act as the responsible owner of the management plans supporting this Policy
- Ensure and demonstrate the Client⁷, Principal Designer, Principal Contractor, and any sub-contractors and consultants that fall within the scope of building and fire safety, are suitably competent. Ensure we adequately manage contracts in line with the commercial management plan throughout the construction, handover phases.
- Maintain suitable records demonstrating competency of the above duty holders and ensure competency is kept under review
- Advise the Learning & Culture Team on relevant training needs and implement a compulsory training programme
- Maintain suitable and sufficient records to demonstrate compliance with fire safety and building safety, and relevant Building Regulations
- Provide the Executive Director of Asset Management & Sustainability with appropriate information and reports on performance and assurance controls.

4.6 Executive Director of Operations

4.6.1 The Executive Director of Operations (EDO) is responsible for corporate health and safety.

4.6.2 Key responsibilities are to:

- Report building and fire safety matters to the Executive Director of Asset Management & Sustainability
- Ensure the implementation of building and fire safety policies and procedures within their areas of responsibility, so strategic, operational, and building-level risks are identified and controlled
- Oversee housing management activities relating to building and fire safety, and support the delivery of related change projects under the oversight of the Building Safety Programme Board (BSPB)
- Ensure oversight of the performance of third parties (like freeholders and their managing agents) with regards to building and fire safety, and own the related management plans supporting this Policy
- Ensure for complex blocks (where SH is working with third parties like freeholders, external managing agents (EMAs)) liability matrices outlining responsibilities by organisation are in place and provide relevant assurance
- Ensure the requirements of building and fire safety legislation and obligations set out in relevant contracts/agreements with our partners, subsidiaries, and other interested parties (managing agents and principal duty holders) reflect our obligations and are met.

4.7 Director of Building Safety

4.7.1 The Director of Building Safety ensures Southern Housing is meeting its duties under building and fire safety legislation post-handover. They are responsible for Policy implementation and determining adequate resources required to meet the Policy objectives.

4.7.2 They will act as Southern Housing's source of competent advice on building and fire safety and ensure our systems of working comply with the duties of the Responsible Person for Fire Safety and the Accountable Person for Building Safety post-handover. They will also establish and maintain a Building & Fire Safety Management System to promote a positive safety culture and ensure supporting policies and building and fire safety management plans are in place to manage risk.

4.7.3 Key responsibilities include to:

- Ensure the requirements of building and fire safety legislation and obligations set out in relevant contracts/agreements with our clients, partners, subsidiaries, and other interested parties (e.g. residents, managing agents, and principal duty holders) reflect our obligations and are met
- Ensure a suitable building and fire safety assurance framework is in place
- Ensure building and fire risk assessments are suitable and sufficient, and are conducted and reviewed by suitability competent persons so far as reasonably practicable from handover and throughout the occupation phase
- Maintain a central repository that contains suitable and sufficient records to demonstrate compliance at regular intervals
- Act as lead officer for Southern Housing with the Building Safety Regulator and Fire & Rescue Services during business-as-usual activities and during major incidents
- Provide key stakeholders including the Executive Director of Asset Management & Sustainability with appropriate information and reports on performance and assurance controls
- Collaborate with all directors (specifically the Director of Construction, Director of Commercial, Director of Asset Compliance, Director of Health & Safety) to develop, review, or amend policies relevant to their areas of responsibility
- Fulfil the asset owner role for building safety information by implementing a document control and information management framework that meets business needs and demonstrates compliance with the Golden Thread and provision of information requirements
- Procure and manage contracts in line with [Procurement Policy](#) and contract management framework, including the Contractor Health & Safety Vetting Procedure and Contractor Health & Safety Management Procedure
- Ensure principal duty holders, consultants, and specialist contractors that fall within the scope of building and fire safety, are suitably competent before and during design and building works

- Advise the Learning & Culture Team on relevant training needs and implement compulsory training programmes
- Maintaining suitable and sufficient training records to demonstrate compliance and competency
- Ensure appropriate resident engagement strategies and building safety complaints procedures are in place.

4.8 Building Safety Programme Board (BSPB)

The Building Safety Programme Board in line with its terms of reference will:

- Set direction and deliver the vision of the Building & Fire Safety Transformation Programme
- Implement the programme whereby scope of the programme includes all new requirements in relation to the [Building Safety Act 2022](#), [Fire Safety Act 2021](#), and all related secondary legislation arising from both, as well as further legislation expected to arise from the Grenfell Inquiry recommendations
- Ensure alignment with the aims of the Building and Fire Safety Policy and related management plans
- Monitor performance of the Building Safety Programme, its projects, and transitions into business-as-usual activity
- Monitor changes in emerging legislation, assessing the impact on Southern Housing's operating models and long-term financial plan
- Review external drivers and evaluate risk exposure across service areas
- Provide competent resources needed for programme progression and ensure relevant business cases are scrutinised
- Communicate to relevant stakeholders the importance of the programme and where applicable, conforming to the requirements of legislation, guidance, and industry best practice
- Direct and support persons internally and externally to contribute to the effectiveness of the programme
- Promote continual improvement and cultural change relating to building safety
- Review compliance with this Policy and associated management plans at regular intervals in relation to new build developments
- Oversee compulsory training programmes for fire and building safety matters.

4.9 Our supply chain

This is relevant to external parties who deliver building services on behalf of Southern Housing that may influence the safety of people in and around our buildings. This may include (but is not limited to) contractors, consultants, designers, engineers, surveyors, risk assessors, and managing agents.

4.10 Compliance

Organisations and individuals delivering services on our behalf must comply with our [Code of Conduct](#) and all relevant building legislation, building and fire safety legislation, and industry standards. Where deviations are required, these must be proposed in writing, impact-assessed, consulted on, and approved by a competent person specified under this Policy.

4.11 Competency

- 4.11.1 All external parties must ongoingly demonstrate they have the required skills, knowledge, experience, and behaviours to carry out design, construction/delivery, and maintenance works on our buildings.
- 4.11.2 External parties must also declare to the relevant SH director and their contractor manager whether serious sanctions have occurred or are being investigated in relation to their professional work.

4.12 Safety concerns

- 4.12.1 Our supply chain has a duty of care to ensure our buildings are safe, secure, and in good quality condition. Where this standard is not met or there is a cause for concern relevant to building and fire safety, they must report issues in writing to their SH director and contract manager as soon as they become aware.

4.13 Our colleagues

- 4.13.1 All colleagues are responsible for:
 - Fostering an open and transparent safety culture by complying with this Policy
 - Taking reasonable care for the safety of themselves and of other relevant persons who may be affected by their acts or omissions at work
 - Co-operating to enable the company to fulfil its duties under relevant legislation and this Policy
 - Raise any concerns they may have in relation to their own safety or safety of others in an around our buildings.
- 4.13.2 We'll make colleagues aware of this Policy via SharePoint, the intranet, corporate induction, and the website. A compulsory introductory module for fire safety is available through LEARN and must be completed by all colleagues.
- 4.13.3 Colleagues are responsible for ensuring they complete all required learning through LEARN. They are also responsible for highlighting any learning that will ensure they remain competent to undertake their duties in line with legislation and this Policy.

4.13.4 Should colleagues wish to retain anonymity, they should raise it through the reporting process set out under our [Whistleblowing Policy](#).

4.14 Our residents and building occupants

4.14.1 Residents and building occupants also have a vital role to play in ensuring our buildings are safe. We communicate those obligations by email, letter, and through our website.

4.14.2 We remind residents of their obligations through a variety of measures e.g. through the annual fire safety instructions.

4.14.3 We'll take resident preferences into account when communicating and we'll make reasonable adjustments in line with our [Reasonable Adjustments & Vulnerable Needs Policy](#).

4.14.4 We'll manage complaints relating to building and fire safety, irrespective of building height, in accordance with our [Complaints Policy](#).

5.0 Building and fire safety risk management approach

5.1 We adopt key principles of the BS 9997:2019 Fire Risk Management 'Plan, Do, Check, Act' model to ensure continuous improvement of our safety management systems and management plans.

5.2 We undertake various assessments to provide safety assurance and corrective actions required to comply with our statutory duties throughout our building's lifecycles. These are outlined in section 14.

5.3 New-build handovers (higher risk buildings)

5.3.1 Written final approval must be received from the Director of Building Safety and the Director of Delivery before building registration and occupation. It must be stored as part of the Golden Thread of Information.

5.3.2 In case of a stock transfer or disposal of higher-risk buildings, the Director of Building Safety must be consulted early. The latter is responsible for registration and deregistration with the Building Safety Regulator and supports handover to new owner with Golden Thread of Information; timescales for which must inform stock transfer timelines.

5.4 Mandatory occurrence reporting (higher risk buildings)

Where safety occurrences have been identified on higher risk buildings, colleagues will follow the Mandatory Occurrence Reporting Procedure.

6.0 Management plans

6.1 We will implement and maintain management plans that describe how we'll comply with our duties under relevant legislation and this Policy.

6.2 Five management plans will support the implementation of this Policy:

Management Plan	Description
Fire Safety Management Plan	Covers how we'll implement and manage compliance with all duties under the Regulatory Reform (Fire Safety) Order 2005 including the Fire Safety Act 2021 , Fire Safety Regulations 2022 , and Building Regulations 2010 post-handover.
Building Safety Management Plan	Covers how we'll implement and manage compliance with duties under the Building Safety Act 2022 and Building Regulations 2010 post-handover.
Delivery Management Plan (Development)	Covers how we'll implement and manage compliance during the design, construction, and defect liability period in line with duties under the Regulatory Reform (Fire Safety) Order 2005 , Building Safety Act 2022 , and Building Regulations 2010 .
3 rd Party Management plan (Managing Agent Relationship Team)	Provide guidance on oversight and processes we apply to manage third parties and ensure they fulfil their duties in relation to building and fire safety

7.0 Performance reporting

7.1 Pre-occupation measures

The Director of Delivery regularly reports building and fire safety performance based on the following:

- *To be determined by Development.*

7.2 Post-occupation measures

The Director of Building Safety regularly reports building and fire safety performance based on the following:

Building safety scorecard (post-occupation)			
Performance measures (post-occupation)	Target	Stakeholder circulation	Frequency
Fire Risk Assessment (FRA) programme: <ul style="list-style-type: none"> No. of blocks requiring a valid FRA No. of blocks without a valid FRA % of blocks with a valid FRA 	100%		
FRA actions: <ul style="list-style-type: none"> No. of high/non-high-risk actions by status (overdue/not overdue) % of not overdue high/non-high-risk actions. 	0%	Board	Quarterly
Fire safety equipment servicing: <ul style="list-style-type: none"> No. of blocks requiring fire safety equipment servicing & testing No. of blocks with not all fire safety equipment servicing & testing carried out on time % of blocks where all fire safety equipment servicing & testing is carried out on time No. of outstanding corrective actions from fire safety equipment servicing. 	0 0 100% 0	Executive Team PAS Health & Safety Group	Monthly Quarterly
Higher-risk buildings (18m+) monthly active system testing: <ul style="list-style-type: none"> % higher-risk blocks where all required monthly active system fire safety testing & firefighting / evacuation lift PPM is completed. 	100%		

Building & fire safety transformation programme			
Performance measure	Report type	Stakeholder circulation	Frequency
<ul style="list-style-type: none"> Project duration, cost, and quality Approved project business cases Project/Assurance Reviews. 	Building Safety Programme Report	Board	Bi-annual
		Executive Team	
	Building Safety Programme Board	Monthly	
	Key Messages	Health & Safety Group	Quarterly

7.3 Please note, as new legislation emerges, we'll review current performance indicators as building and fire safety projects transition to business-as-usual activity.

8.0 Cost recovery and recharging

8.1 Where latent building defects are identified that pose a to fire spread or the structural integrity of the building, we will exhaust routes to recovery costs through:

- Insurance (e.g., contractors' professional indemnity or building insurance)
- Relevant government grants (e.g. Cladding Safety Scheme, Building Safety Fund)
- Relevant designer, contractor, product, manufacturer, installer warranties if they are commercially viable for Southern Housing, to protect our charitable status and limit the diversion of resource from reinvesting in our buildings.

8.2 Where legislation permits resident charging, we will recover costs in line with our [Homeowners Policy](#) and [Service Charge Policy](#).

9.0 What we've done to ensure this Policy is fair

9.1 We've carried out an Equality Impact Assessment to consider the positive and negative impacts this Policy may have on people with protected characteristics under the [Equality Act 2010](#).

9.2 We recognise some residents, or prospective residents, may need adjustments due to a language barrier, disability, cultural need, or vulnerability. In these circumstances, in line with our [Reasonable Adjustments & Vulnerable Needs Policy](#), we'll work with them to ensure we consider their specific needs, on a case-by-case basis, provided it doesn't compromise health and safety to individuals or homes. This includes working in partnership

with other agencies to ensure we manage and mitigate any known risks of safety and wellbeing.

- 9.3 We aspire to embed diversity and inclusion within the culture of our business activities.

10.0 Review

- 10.1 We will review this Policy and management plans to address legislative, regulatory, best practice, or operational issues every two years as a minimum.

Policy controls

Version 1.0 – effective 2 March 2026

Appendix one: Measuring policy performance post-occupation

Objective	Key Performance Indicator(s)	Method of Measurement	Evidence location
<p>a. avoid the creation and/or enhancement of building and fire safety risks.</p>	<ul style="list-style-type: none"> • Appropriate Building Alterations process agreed, implemented, and monitored. • Reference to the relevant Building Safety Checklist • In date fire risk assessments, building safety risk assessment and registers. • Robust contract management of our supply chain working on and in our buildings. • Resident Engagement Strategy consultations. 	<ul style="list-style-type: none"> • Quarterly Risk register reviews (inc. Strategic and Operational) • Combined Asset Compliance Scorecard • Consultation feedback • Fire safety risk assurance report. • Building Safety Team business plan 	<ul style="list-style-type: none"> • Building Safety Team SharePoint pages
<p>b. assess and evaluate Building Safety Risks that are unavoidable, including identifying the proportionate measures required to address, reduce, mitigate and control the risks.</p>	<ul style="list-style-type: none"> • Delivery of Person-Centred Fire Risk Assessment activities where need identified. • Delivery and monitoring of changes in evacuation strategies. • Electronic audit trail of applied controls, risk evaluations and decisions. 	<ul style="list-style-type: none"> • Fire safety risk assurance report. • Building Risk Assessments and Register Audit • Change in evacuation strategy approved forms. • Team minutes and actions • Building Safety Team business plan 	<ul style="list-style-type: none"> • Building Safety Team SharePoint pages
<p>c. combat Building Safety Risks at source to address, reduce,</p>	<ul style="list-style-type: none"> • Delivery of the Passive Works Programme 	<ul style="list-style-type: none"> • Combined Asset Compliance Scorecard 	<ul style="list-style-type: none"> • Procurement team SharePoint/Network drives

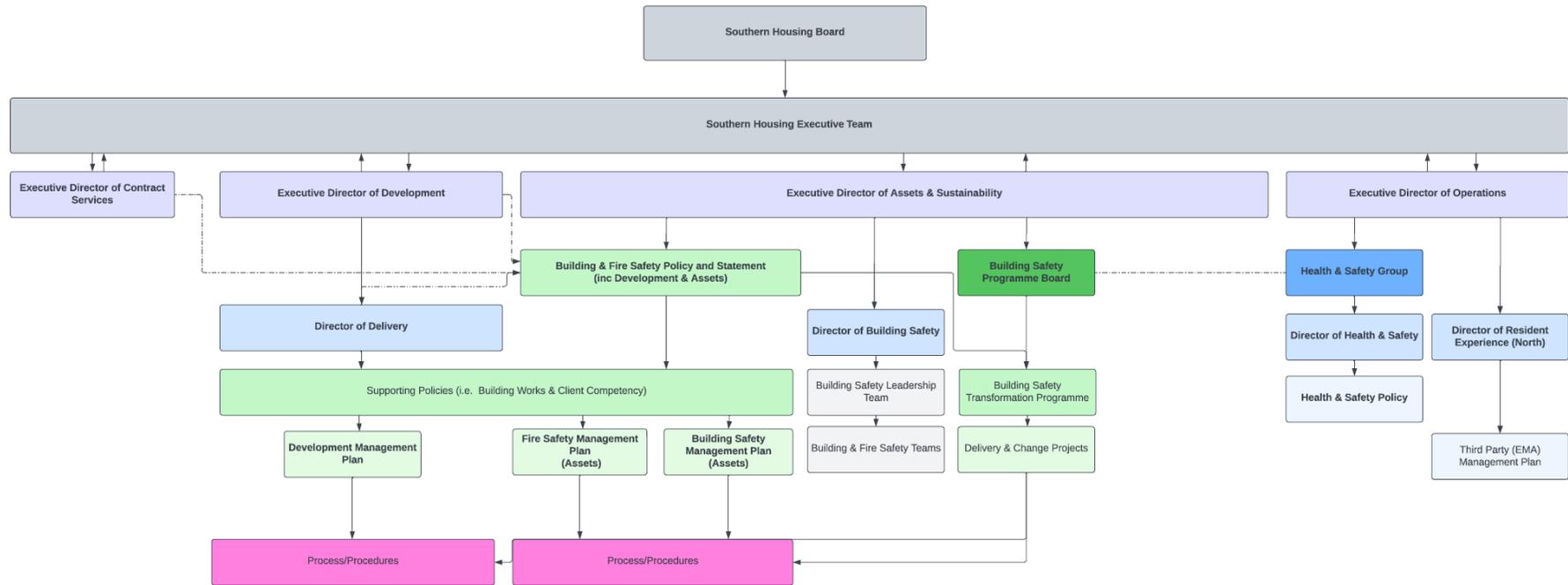
mitigate, and control risks at the earliest opportunity.	<ul style="list-style-type: none"> • Delivery of the Facade Remediation Programme • Implementation of comprehensive competency evaluations of principal duty holders before building work commences. Recording and monitoring competency throughout the construction phase. • Implementation and monitoring of Asset Assurance Go- No Go Reviews 	<ul style="list-style-type: none"> • Building Safety Programme Report • Evidence of competency evaluations • Internal Asset Assurance Reports • Building Safety Team business plan 	<ul style="list-style-type: none"> • Development Team Page • Building Safety Team SharePoint pages
d. Ensure suitable and proportionate systems are in place for the effective inspection, testing and maintenance of the efficacy of measures taken	<ul style="list-style-type: none"> • Building and fire safety management plans available and up to date. • Regular servicing and inspections of fire safety systems. 	<ul style="list-style-type: none"> • Reviews of policy and management plans • Contract Management minutes. • Combined Asset Compliance Scorecard • Building Safety Team business plan 	<ul style="list-style-type: none"> • Building Safety Team SharePoint pages • Apex • PowerBi
e. prioritise collective protective measures over individual protective measures and; f. where reasonable to do so, replace the dangerous with the non-dangerous or less-dangerous.	<ul style="list-style-type: none"> • Delivery of the Passive Works Programme • Delivery of the Facade Remediation Programme 	<ul style="list-style-type: none"> • Combined Scorecard • Contract Management minutes. • Building Safety Programme Report 	<ul style="list-style-type: none"> • RiskHub • Network files
g. wherever practicable take advantage of technical progress in managing building safety risks	<ul style="list-style-type: none"> • Contractor innovation and continuous improvement through our contract management framework • G15 subject matter group meetings • Webinars & Seminars. • Industry and sector consultations 	<ul style="list-style-type: none"> • Contract Management minutes. • Viewpoint • Building safety programme report • G15 subject matter group agenda/minutes • Consultation responses • Staff training requests 	<ul style="list-style-type: none"> • Network files. • Viewpoint – external EDMS
h. consider the impacts on residents and provide	<ul style="list-style-type: none"> • Implementation of Resident engagement strategy 	<ul style="list-style-type: none"> • Consultation feedback 	<ul style="list-style-type: none"> • Network files.

resident communications via appropriate channels.	<ul style="list-style-type: none"> • Submission of reports to the Resident Strategy Group • Façade Remediation Programme onsite engagement 	<ul style="list-style-type: none"> • RSG/RAG Reports • Complaints Policy • Tenant Satisfaction Measures • Resident satisfaction survey 	<ul style="list-style-type: none"> • SharePoint
i. Give appropriate instructions and information to employees and persons undertaking works to our buildings.	<ul style="list-style-type: none"> • Staff training on Building and Fire Safety • Lead officer training – CDM. • Tender packages outlining duty holder responsibilities and employer's requirements. 	<ul style="list-style-type: none"> • Building & Fire Safety Policy and supporting policies and procedures. • Lead officer training and measures. • Employer's requirements updates • Fire safety training and measures. • Alterations project brief reviews 	<ul style="list-style-type: none"> • LEARN (e-learning hub) • SharePoint • Contracts • Competency records
j. Develop an effective and sustainable buildings information management system.	<ul style="list-style-type: none"> • Building Information Management Strategy and management plan available and approved by BSPB and Information Governance Group 	<ul style="list-style-type: none"> • Building Safety Programme Report • Building Safety Checklist report • Building Safety Team business plan 	<ul style="list-style-type: none"> • Network files. • SharePoint
k. ensure any person responsible for or assisting with compliance with building and fire safety has the relevant competence and demonstrable experience.	<ul style="list-style-type: none"> • Staff training on Building and Fire Safety • Tender and contract reviews on competency requirements • External events i.e. webinars • Professional accreditations • Industry and sector consultations 	<ul style="list-style-type: none"> • Building & Fire Safety tender evaluations • Contract management audits by HST. • Fire Safety Risk Assurance Reports • Appraisals and 1-2-1s • Consultation responses • Staff training requests 	<ul style="list-style-type: none"> • LEARN • SharePoint • Network files. • Contracts

Appendix two: Measuring policy performance pre-occupation

To be added by Development

Appendix three: Building safety governance structure





Appendix four: Building & fire safety risk assessments

Assessment Type	Triggers for Assessment Review	Reassessment Frequency
Pre-Occupation Building Risk Assessments		
Design Review <i>RIBA Stage 0-2</i>	<ul style="list-style-type: none"> New Land and New Business / Regeneration schemes prior to bid-clearance meeting through to planning approval 	<ul style="list-style-type: none"> Continuous process
Design Review <i>RIBA Stage 3-5</i>	<ul style="list-style-type: none"> Technical design through to end of construction 	<ul style="list-style-type: none"> Continuous process
Pre-Occupation Fire Risk Assessment <i>RIBA Stage 5-6</i>	<ul style="list-style-type: none"> 12 weeks before handover 	<ul style="list-style-type: none"> Upon completion of the FRA actions
Post-Occupation Risk Assessments		
Fire Risk Assessment (Type 1) <i>RIBA Stage 7</i>	<ul style="list-style-type: none"> Following a fire in the premises Following a change in use or function of the premises Following a change in the structure or fabric of the building. Following a related change in legislation (or associated guidance) Where the assessment is no longer deemed as valid. At regular intervals between Fire Risk Assessments 	<ul style="list-style-type: none"> New assessment required every 1, 2 or 3 years depending on building characteristics and occupancy. where instructed by the Director of Building Safety or as recommended by the Head of Building Safety Risk or Head of Fire Safety Risk. Where recommended by a competent person.
Fire Risk Assessment (Type 4) <i>RIBA Stage 7</i>	<ul style="list-style-type: none"> Recommendation during type 1. Identified cause for concern (i.e. referrals from Capital Investment) 	<ul style="list-style-type: none"> Frequency recommended by the Fire Risk Assessor; and Where significant alterations/change has occurred
Structural Assessment <i>RIBA Stage 7</i>	<ul style="list-style-type: none"> Identified cause for concern (i.e. referrals from Capital Investment) 	<ul style="list-style-type: none"> where instructed by the Director of Building Safety or as

Assessment Type	Triggers for Assessment Review	Reassessment Frequency
	<ul style="list-style-type: none"> To support the development of Building Safety Risk Assessments. 	<p>recommended by the Head of Building Safety Risk or Head of Fire Safety Risk.</p> <ul style="list-style-type: none"> Where recommended by a competent person.
<p>Building Safety Risk Assessment (Higher Risk Buildings)</p> <p><i>RIBA Stage 7</i></p>	<ul style="list-style-type: none"> Following a fire in the premises Following a change in use or function of the premises Following a change in the structure or fabric of the building. Following a related change in legislation (or associated guidance) Submission of mandatory occurrence notification or report Upon request from the Building Safety Regulator. 	<ul style="list-style-type: none"> Every 3-5 years Where significant alterations/change has occurred. where instructed by the Director of Building Safety or as recommended by the Head of Building Safety Risk or Head of Fire Safety Risk.