



Building Safety Policy





1.0 Introduction

- 1.1 Housing Plus Group (HPG) is a registered provider of housing and care services committed to delivering safe, compliant and well-managed buildings.
- 1.2 This Building Safety Policy defines HPG's overarching framework for fulfilling its legal and regulatory obligations under the Building Safety Act 2022, associated regulations, and the Social Housing (Regulation) Act 2023. It sets out how HPG ensures the effective management of fire and structural safety risks across its property portfolio.
- 1.3 The policy applies to all buildings owned or managed by HPG where the organisation holds duties under housing, fire safety, or health and safety legislation, including Higher-Risk Buildings (HRBs) as defined by the Building Safety Act 2022.
- 1.4 HPG's approach to building safety is founded on the following principles:
 - Maintaining a compliant Golden Thread of building information;
 - Embedding a resident-centred culture that promotes transparency, inclusion, and empowerment;
 - Managing fire and structural risks through proactive, evidence-based assessment and control; and
 - Ensuring clear accountability and competence through defined governance and training.
- 1.5 HPG recognises and applies the lessons from the Grenfell Tower Inquiry and the Building a Safer Future programme, demonstrating commitment to continuous improvement in building safety culture and practice.

2.0 Policy Statement

- 2.1 HPG fully accepts its statutory duties under the following primary legislation and associated regulations:
 - 2.1.1 Building Safety Act 2022
 - 2.1.2 Regulatory Reform (Fire Safety) Order 2005, as amended by the Fire Safety Act 2021
 - 2.1.3 Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023
 - 2.1.4 Social Housing (Regulation) Act 2023
 - 2.1.5 Health and Safety at Work etc. Act 1974 and other relevant statutory instruments
- 2.2 HPG will proactively manage building safety risks, especially those related to fire and structural integrity, in accordance with the Building Safety Regulator's expectations and best practices in the social housing sector.
- 2.3 To achieve and maintain compliance with building safety standards, HPG commits to a comprehensive approach that includes identifying and managing safety risks, ensuring accurate documentation and reporting for Higher-Risk Buildings, establishing clear governance and accountability, providing necessary training for all personnel, engaging residents effectively, collaborating with regulatory bodies, and



continuously enhancing safety performance through ongoing review and learning, as detailed in the subsequent sections of this policy.

- 2.4 The HPG Board and Executive Management Team accept full corporate responsibility for ensuring compliance with building safety legislation. They will provide visible leadership, adequate resources and appropriate governance to support effective implementation of this policy.
- 2.5 HPG will embed a positive safety culture across all levels of the organisation through:
 - 2.5.1 Clear leadership and accountability;
 - 2.5.2 Continuous training, professional development, and competence assurance;
 - 2.5.3 Open communication and reporting without blame; and
 - 2.5.4 Learning from incidents, audits, and resident feedback to drive improvement.
- 2.6 HPG recognises the rights of residents and leaseholders as defined under the Building Safety Act 2022, including the right to:
 - 2.6.1 Access safety information relating to their building;
 - 2.6.2 Be consulted on building safety matters that affect them; and
 - 2.6.3 Escalate unresolved concerns to the Building Safety Regulator (BSR).
- 2.7 HPG will comply with all current and forthcoming statutory requirements set out under Awaab's Law. The organisation will ensure that hazards presenting a risk to health or safety within its homes are identified, investigated, and remedied within the timeframes prescribed by law, and that future phases of Awaab's Law are implemented as they come into force.
- 2.8 By establishing a governance framework, this policy enables the organisation to deliver and demonstrate building safety compliance effectively.

3.0 Policy Scope

- 3.1 This policy applies to all residential buildings owned, managed, or controlled by HPG, including those where HPG has statutory or contractual responsibilities for fire and structural safety, as well as communal areas subject to the Regulatory Reform (Fire Safety) Order 2005 (as amended). It ensures the effective management of fire and structural safety risks across all relevant premises and must be applied consistently across operational activities, contracts, and service delivery arrangements, as outlined in the Building Safety Management Procedures.
- 3.2 The policy covers all residential accommodation types within HPG's portfolio and extends to any part of a building or shared system for which HPG has responsibility under housing, fire safety, or health and safety legislation.
- 3.3 Particular emphasis is placed on Higher-Risk Buildings (HRBs) as defined in Section 3 – Definitions and associated regulations. HPG will ensure full compliance with the duties placed on Accountable Persons and the Principal Accountable Person for such buildings.
- 3.4 This policy is binding upon all HPG employees, agency staff, contractors, consultants, suppliers, and partners engaged in activities affecting building safety. It applies to anyone involved in the management or occupation of HPG buildings, including residents and leaseholders, who are expected to cooperate with HPG to ensure compliance with statutory and policy requirements.

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- 3.5 HPG will fulfil its obligations to cooperate, coordinate, and exchange safety information in accordance with the Building Safety Act 2022.

This policy should be read in conjunction with HPG's suite of compliance and health and safety policies, which together form the Group's framework for managing whole-building safety and risk.

4.0 Definitions

- 4.1 Accountable Person (AP): As defined in Section 72 of the Building Safety Act 2022. The individual or organisation responsible for repairing and maintaining common parts of a Higher-Risk Building (HRB) and for managing building safety risks.
- 4.2 Principal Accountable Person (PAP): The AP with responsibility for the structure and exterior of a HRB. Where there is only one AP, they are automatically designated as the PAP.
- 4.3 Building Safety Regulator (BSR): A statutory body within the Ministry of Housing, Communities and Local Government (MHCLG) responsible for overseeing the safety and performance of higher-risk residential buildings in England. The BSR holds enforcement powers under the Building Safety Act 2022.
- 4.4 Building Safety Case: A structured and evidence-based assessment that identifies and evaluates fire and structural safety risks. It demonstrates how these risks are controlled to prevent or mitigate the spread of fire and the potential for structural failure. The Safety Case outlines the processes used to identify, evaluate, and manage fire and structural risks to prevent or mitigate serious harm.
- 4.5 Building Safety Case Report: A concise document summarising the key findings of the Building Safety Case.
- 4.6 Building Assessment Certificate (BAC): A certificate issued by the Building Safety Regulator (BSR) confirming that an HRB's Safety Case Report has been reviewed and meets regulatory expectations.
- 4.7 Golden Thread of Information: A live, accurate, and secure digital record of building information maintained throughout a building's lifecycle, as defined in BS 8644-1:2022. It includes all safety-critical data relating to design, construction, maintenance, and management.
- 4.8 Competence: A combination of skills, knowledge, experience, and behaviours necessary to perform a role safely and effectively. For building safety roles, competence must meet the criteria set out in BSI Flex 8670 and PAS 8673:2022.
- 4.9 Higher-Risk Building (HRB): A residential building in England that is at least 18 metres in height or has seven or more storeys and contains at least two residential units, as defined under Section 65 of the Building Safety Act 2022.
- 4.10 Common Parts: Areas of a building used by or serving more than one residential unit, including stairwells, corridors, plant rooms, risers, roofs, external walls, and structural elements subject to building safety duties.
- 4.11 Mandatory Occurrence: An incident or event presenting a significant risk to life safety, fire spread, or structural integrity that must be reported to the Building Safety Regulator (BSR) within ten calendar days, in accordance with the Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023.

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- 4.12 Fire Risk Assessment of External Walls (FRAEW): A specialist assessment required under the Fire Safety Act 2021 to determine the combustibility and fire performance of a building's external wall systems.
 - 4.13 Personal Emergency Evacuation Plan (PEEP): An individual evacuation plan designed for a resident or occupant who may require assistance to evacuate safely in an emergency situation.
 - 4.14 Resident Engagement Strategy (RES): A building-specific strategy required under Section 91 of the Building Safety Act 2022, setting out how residents will be informed, consulted, and involved in decisions relating to building safety.
 - 4.15 Safety-Critical System: Any building system, installation, or structural component that, if failed or impaired, could compromise the safety of residents or the structural integrity of the building (e.g. fire doors, alarms, smoke control, lifts, or structural supports).
 - 4.16 Dutyholder: An individual or organisation with a legal responsibility for ensuring building safety under relevant legislation, including the Building Safety Act 2022, Health and Safety at Work etc. Act 1974, and Construction (Design and Management) Regulations 2015.

5.0 Roles and Responsibilities

5.1 Board and Governance

- 5.1.1 The HPG Board holds ultimate corporate accountability for building safety and compliance with the Building Safety Act 2022.
- 5.1.2 The Audit & Risk Committee provides independent oversight and assurance on the adequacy of building safety governance, controls and performance.
- 5.1.3 The Board and Committee will:
 - Approve this policy and major revisions;
 - Set the Group's building safety strategy and risk appetite;
 - Monitor assurance and compliance performance; and
 - Ensure adequate resources and leadership are in place to deliver statutory duties.

5.2 Principal Accountable Person (PAP)

- 5.2.1 Housing Plus Group (HPG), as a corporate entity, is the Principal Accountable Person (PAP) for all Higher-Risk Buildings (HRBs) it owns or manages.
- 5.2.2 The PAP is legally responsible for assessing and controlling fire and structural safety risks, maintaining the Golden Thread of building information, and ensuring that effective governance and resident engagement arrangements are in place.
- 5.2.3 The PAP will demonstrate compliance through Safety Cases, Safety Case Reports, and resident engagement strategies, as required by the Building Safety Act 2022 and PAS 8673.

5.3 Accountable Person (AP) – Chief Executive

- 5.3.1 The Chief Executive acts as the Accountable Person (AP) on behalf of HPG, providing corporate leadership and ensuring that all statutory duties are fulfilled.
- 5.3.2 The Chief Executive will:

- Ensure compliance with all PAP and AP responsibilities;
- Allocate sufficient resources to maintain building safety; and
- Report significant risks or enforcement actions to the Board.

5.4 Executive Management Team (EMT)

5.4.1 The Executive Management Team supports the Chief Executive in delivering building safety compliance across all relevant operations.

5.4.2 The EMT will ensure that:

- Building safety is integrated within strategic and operational planning;
- Departmental delivery aligns with statutory and policy requirements; and
- Escalated risks or non-compliances are reviewed and resolved.

5.5 Executive Director of Investment and Growth

5.5.1 The Executive Director of Investment and Growth is the senior executive lead and Health and Safety Lead under the Social Housing (Regulation) Act 2023.

5.5.2 The Director provides strategic oversight of building safety performance, chairs the Building Safety Governance Forum, and ensures effective liaison with regulators and the Board.

5.6 Director of Building Compliance and Safety

5.6.1 The Director of Building Compliance and Safety holds strategic responsibility for building safety management and assurance.

5.6.2 The Director will:

- Oversee development and delivery of the Building Safety Policy and Safety Cases;
- Manage relationships with the Building Safety Regulator and other enforcement bodies; and
- Provide regular compliance assurance to the EMT and Audit & Risk Committee.

5.7 Senior Management Level

5.7.1 The senior manager is responsible for the operational delivery of the building safety programme and compliance monitoring.

5.7.2 The role ensures that risk assessments, inspection programmes, and resident engagement are effectively managed and that significant risks are escalated through governance channels.

5.8 Compliance Leads and Technical Specialists

5.8.1 Specialist compliance leads (e.g. fire, electrical, gas, water, asbestos, and lifts) are responsible for ensuring statutory testing, maintenance, and record accuracy within their disciplines.

5.8.2 They support Safety Case development, risk reviews, and technical assurance reporting.

5.9 Employees

5.9.1 All employees share responsibility for supporting safe homes by complying with this policy, reporting hazards or concerns promptly, and maintaining competence relevant to their role.

5.10 Contractors, Consultants, and Service Providers

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- 5.10.1 Contractors and consultants engaged in safety-critical work must be demonstrably competent, accredited, and compliant with HPG's safety and quality standards.
 - 5.10.2 They must report incidents or defects immediately and cooperate with audits, Safety Case preparation, and inspections.

5.11 Residents and Leaseholders

- 5.11.1 Residents and leaseholders play an active role in maintaining safe homes by:
 - Allowing reasonable access for inspections and works;
 - Following building safety guidance; and
 - Reporting hazards or safety concerns promptly.
- 5.11.2 HPG will ensure that residents understand their rights under the Building Safety Act 2022, including access to safety information and the right to escalate unresolved concerns to the Building Safety Regulator (BSR).

6.0 Applicable Legislation and Guidance

- 6.1 This policy supports compliance with the Regulatory Framework for Social Housing in England, including the Consumer Standards introduced by the Regulator of Social Housing (RSH) from 1 April 2024.
- 6.2 The principal legislation underpinning this policy includes:
 - 6.2.1 Building Safety Act 2022
 - 6.2.2 Building Regulations 2010 (as amended)
 - 6.2.3 Higher-Risk Buildings (Descriptions and Supplementary Provisions) Regulations 2023
 - 6.2.4 Higher-Risk Buildings (Management of Safety Risks etc.) (England) Regulations 2023
 - 6.2.5 Regulatory Reform (Fire Safety) Order 2005
 - 6.2.6 Fire Safety Act 2021
 - 6.2.7 The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025
 - 6.2.8 Health and Safety at Work etc. Act 1974
 - 6.2.9 Management of Health and Safety at Work Regulations 1999
 - 6.2.10 Defective Premises Act 1972
 - 6.2.11 Landlord and Tenant Act 1985
 - 6.2.12 Housing Act 2004 (Housing Health and Safety Rating System)
 - 6.2.13 Social Housing (Regulation) Act 2023
 - 6.2.14 Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- 6.3 The following Approved Codes of Practice (ACoPs), British Standards, and statutory guidance are relevant to this policy:
 - 6.3.1 BS 8644-1:2022 – Digital management of fire safety information (Golden Thread)
 - 6.3.2 PAS 8671:2022 – Competence requirements for Principal Designers (Building Safety Act)
 - 6.3.3 PAS 8672:2022 – Competence requirements for Principal Contractors (Building Safety Act)
 - 6.3.4 PAS 8673:2022 – Competence framework for the Principal Accountable Person and Accountable Persons

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- 6.3.5 BSI Flex 8670:2021 – Core criteria for building safety competence frameworks
 - 6.3.6 HSE Building Safety Regulator Guidance – Registration, Safety Cases, and Mandatory Occurrence Reporting
 - 6.3.7 Home Office Fire Safety Guidance – Fire Risk Assessments and External Wall Assessment (FRAEW)
 - 6.3.8 Ministry of Housing, Communities and Local Government (MHCLG) / Department for Levelling Up, Housing and Communities (DLUHC) guidance on building safety reforms
 - 6.3.9 National Fire Chiefs Council (NFCC) – Guidance on Fire Safety in Specialised Housing (2021)
 - 6.3.10 British Standard BS 9997:2019 – Fire risk management systems
- 6.4 This policy also aligns with the following sector guidance and best practice frameworks:
- 6.4.1 Building a Safer Future Charter
 - 6.4.2 Grenfell Tower Inquiry Phase 1 and 2 Recommendations
 - 6.4.3 Local Government Association (LGA) – Fire Safety in Purpose-Built Blocks of Flats (2021)
 - 6.4.4 Health and Safety Executive (HSE) – Managing for Health and Safety (HSG65)
 - 6.4.5 Regulator of Social Housing (RSH) – Building Safety Consumer Standard (2024)
- 6.5 HPG will maintain active monitoring of legislative changes and standards to ensure that all building safety activities remain compliant and in line with current regulatory expectations.

7.0 Policy Delivery Programme

- 7.1 HPG will operate a structured, risk-based Building Safety Delivery Programme to ensure that all buildings are safe, compliant and effectively managed.
- 7.2 The programme defines how HPG identifies, assesses, and controls building safety risks, with specific emphasis on Higher-Risk Buildings (HRBs).
- 7.3 Registration and Regulatory Compliance
 - 7.3.1 HPG will ensure that all Higher-Risk Buildings are registered with the Building Safety Regulator (BSR) and maintain continuing compliance with all applicable statutory requirements.
 - 7.3.2 HPG will retain and make available evidence of registration, certification, and compliance on request from the BSR or other regulators.
- 7.4 Safety Cases and Risk Management
 - 7.4.1 HPG will develop, maintain, and review Safety Cases and associated Safety Case Reports for each Higher-Risk Building.
 - 7.4.2 Each Safety Case will demonstrate how fire and structural risks are identified, evaluated, and controlled to prevent or mitigate serious harm.
 - 7.4.3 Safety Cases will be reviewed periodically and whenever there is a significant change to building structure, systems, or occupancy, or as required by the BSR.
- 7.5 Golden Thread of Information

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- 7.5.1 HPG will maintain a Golden Thread of information for every Higher-Risk Building, as defined in Section 3 – Definitions.
 - 7.6 Fire and Structural Safety Management
 - 7.6.1 HPG will manage fire and structural safety risks through proportionate, risk-based inspection, maintenance, and remedial programmes undertaken by competent professionals.
 - 7.6.2 All risk assessment outcomes and resulting actions will be prioritised and monitored through the Group's compliance management framework.
 - 7.7 Building Safety Management Plans
 - 7.7.1 Each Higher-Risk Building will have a documented Building Safety Management Plan setting out how safety risks are controlled, roles are defined, and residents are protected.
 - 7.7.2 Plans will be reviewed periodically to ensure they remain accurate and effective following any material change to the building or its occupancy.
 - 7.8 Mandatory Occurrence Reporting
 - 7.8.1 HPG will comply with Mandatory Occurrence Reporting requirements under the Building Safety (Management of Safety Risks etc.) (England) Regulations 2023 and internally escalated through HPG's governance framework.
 - 7.8.2 Records of all notifications, outcomes, and lessons learned will be maintained to support transparency and regulatory assurance.
 - 7.9 Resident Engagement and Communication
 - 7.9.1 Resident engagement is central to the effective management of building safety.
 - 7.9.2 Each Higher-Risk Building will have a Resident Engagement Strategy that ensures residents are informed, consulted, and able to participate in decisions relating to their building's safety.
 - 7.9.3 HPG will ensure that information is accessible, timely, and provided in appropriate formats to reflect residents' needs and promote understanding of safety arrangements.
 - 7.10 Emergency Preparedness and Response
 - 7.10.1 HPG will maintain robust arrangements for emergency preparedness, including fire and structural emergency response planning, coordination with emergency services, and resident support.
 - 7.10.2 Personal Emergency Evacuation Plans (PEEPs) will be developed and reviewed for residents requiring additional assistance, in line with statutory guidance and good practice
 - 7.11 Assurance and Continuous Improvement
 - 7.11.1 HPG will monitor and review building safety performance through internal assurance reviews, independent audits, and governance reporting.
 - 7.11.2 Outcomes, trends, and lessons learned will inform continuous improvement in building safety management and future policy development.
 - 7.11.3 HPG will ensure that improvement activity is evidence-based and takes account of resident feedback, audit findings, and regulatory learning.



8.0 Action Management

- 8.1 HPG will maintain a consistent and transparent approach to identifying, prioritising, tracking, and completing actions arising from inspections, risk assessments, audits, incidents or resident feedback.
- 8.2 The objective is to ensure that all risks to life safety and structural integrity are managed effectively within defined timeframes and that assurance can be demonstrated to regulators and residents.
- 8.3 Risk Prioritisation and Control
 - 8.3.1 All actions will be risk-assessed and prioritised according to their potential impact on life safety, fire spread, or structural stability.
 - 8.3.2 Resources will be allocated to address the highest-risk issues first, ensuring proportionate control and mitigation in line with HPG's Building Safety Risk Assessment Methodology.
 - 8.3.3 Interim safety measures will be implemented where full remediation cannot immediately be achieved.
- 8.4 Tracking and Verification
 - 8.4.1 All building safety actions will be recorded and monitored through HPG's central compliance management system to maintain an auditable record of progress and completion.
 - 8.4.2 Actions will remain open until verified as completed by a competent person, supported by appropriate evidence and documentation.
- 8.5 Escalation and Oversight
 - 8.5.1 Outstanding or overdue actions will be escalated in accordance with HPG's Compliance Escalation Framework to ensure timely resolution.
 - 8.5.2 High-risk or systemic issues will be reported to the Director of Building Compliance and Safety and the Executive Management Team for review and corrective action.
- 8.6 Reporting and Continuous Improvement
 - 8.6.1 Building safety performance, including action completion rates and emerging risk trends, will be monitored through the Compliance Performance Framework and reported to the Audit & Risk Committee.
 - 8.6.2 Findings will inform future programmes, training needs, and continuous improvement activity.
 - 8.6.3 Lessons learned from incidents, audits, and resident feedback will be incorporated into subsequent reviews of the Building Safety Management Plan and related procedures.

9.0 Competence and Training

- 9.1 Purpose and Commitment
 - 9.1.1 Housing Plus Group (HPG) recognises that competent individuals are fundamental to the effective management of building safety risks.
 - 9.1.2 HPG will ensure that all staff, contractors, and partners involved in the management or delivery of building safety functions are competent, trained, and supported to carry out their duties effectively.

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- 9.1.3 The Group will maintain a demonstrable culture of competence consistent with the principles set out in BSI Flex 8670 and associated PAS 8671–8673 frameworks, as defined in Section 3 – Definitions.

9.2 Governance and Framework

- 9.2.1 HPG will maintain a Building Safety Competence Framework defining role-specific competence requirements for all staff, contractors, and partners engaged in building safety.
- 9.2.2 The framework will be aligned with current legislation, national standards, and regulator guidance and will be reviewed regularly to ensure ongoing compliance and relevance.
- 9.2.3 Competence frameworks, training requirements, and professional development pathways will be defined, implemented, and monitored across the organisation.
- 9.2.4 Competence records will form part of the Golden Thread of Information, providing evidence of compliance to regulators and auditors.

9.3 Staff Competence

- 9.3.1 All employees involved in building safety will possess the qualifications, knowledge, skills, and experience appropriate to their role.
- 9.3.2 Employees will receive induction and ongoing training proportionate to their level of responsibility, ensuring understanding of the Building Safety Act 2022, relevant health and safety legislation, and internal compliance procedures.
- 9.3.3 Competence will be assured through a structured training and verification process, including regular assessment and refresher training when required by regulatory or role changes.
- 9.3.4 Professional development will be supported through continuous learning, accreditation, and participation in recognised industry schemes.
- 9.3.5 Competence will be reviewed periodically as part of HPG's performance and assurance processes.

9.4 Contractor and Partner Competence

- 9.4.1 HPG will only engage contractors, consultants, and service providers who can demonstrate competence for the specific building safety tasks they perform.
- 9.4.2 Competence will be verified through recognised third-party accreditation, qualifications, and evidence of relevant experience.
- 9.4.3 Contractors undertaking work affecting fire or structural safety must hold appropriate certification or accreditation.
- 9.4.4 Contractor performance and competence will be subject to ongoing monitoring, audit, and review, with corrective action taken where standards are not met.

9.5 Dutyholder Competence and Leadership

- 9.5.1 The Principal Accountable Person (PAP), Accountable Persons (APs), and other designated dutyholders will maintain competence appropriate to their statutory and leadership responsibilities.
- 9.5.2 Senior Responsible Persons, Accountable Persons, and Building Safety Managers will maintain competence commensurate with their professional accountability.



9.5.3 Competence expectations for each role will be defined within HPG's Building Safety Competence Framework and will reflect the requirements of PAS 8673:2022.

9.5.4 All dutyholders will maintain an up-to-date record of qualifications, training, and professional development activities as part of the Golden Thread of Information.

9.6 Continuous Professional Development (CPD) and Improvement

9.6.1 HPG will promote a culture of continuous learning and professional development across all areas of building safety management.

9.6.2 Learning will be captured from audits, incident investigations, regulator feedback, and resident feedback to inform training and competence improvement.

9.6.3 Refresher training and targeted upskilling will be provided in response to lessons learned, regulatory updates, or new technical standards.

9.6.4 Evidence of competence and training completion will form part of HPG's annual assurance reporting to the Executive Management Team (EMT) and Audit & Risk Committee.

9.6.5 The Head of Building Safety, supported by HR and Learning & Development, will oversee annual reviews of staff and contractor competence.

9.6.6 Findings from these reviews will be used to refine competence requirements, update training content, and inform continuous improvement activities.

9.6.7 Competence records will be auditable and retained in accordance with HPG's Data Retention Policy.

10.0 Resident Communication, Engagement and Notification

10.1 HPG recognises that effective communication and engagement with residents and stakeholders is fundamental to achieving and sustaining building safety.

10.2 HPG will ensure residents are informed, consulted, and able to participate in decisions affecting the safety of the buildings in which they live.

10.3 Engagement activity will be inclusive, transparent, and accessible to all customers – including leaseholders, shared owners, and residents of specialist housing or care settings – and proportionate to the level of risk associated with each building.

10.4 All communication and engagement will comply with the principles and duties set out in the Building Safety Act 2022, the Building Safety (Management of Safety Risks etc.) (England) Regulations 2023, and the Equality Act 2010.

10.5 Resident Engagement Strategy (RES)

10.5.1 Each Higher-Risk Building (HRB) will have a Resident Engagement Strategy that defines how residents will be informed, consulted, and involved in the ongoing management of building safety.

10.5.2 The Strategy will align with statutory principles, ensuring that information about building safety risks, responsibilities, and control measures is communicated in a clear, proportionate, and accessible manner.

10.5.3 Engagement activities may include meetings, digital updates, surveys, or other communication channels through which residents can raise concerns, receive feedback on safety actions, and contribute to decisions affecting their building.

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- 10.5.4 Evidence of resident consultation and engagement will form part of HPG's assurance framework and be retained within the Golden Thread of Information.

10.6 Information for Residents

- 10.6.1 Residents will be provided with timely and accurate information covering fire and structural safety measures within their building, emergency procedures and Personal Emergency Evacuation Plans (where applicable), planned safety works or inspections, and how to report concerns or request further information.
- 10.6.2 Information will be supplied in accessible formats and languages reflecting residents' communication needs, in accordance with HPG's Equality, Diversity and Inclusion Policy. Residents will be informed about significant safety works, incidents, or management changes that may affect their safety or occupation.
- 10.6.3 HPG will ensure residents understand their own responsibilities under the Building Safety Act 2022, including maintaining safe behaviour and cooperating with reasonable safety requests.

10.7 Resident Feedback, Escalation and Assurance

- 10.7.1 Resident feedback will be actively sought, recorded, and reviewed as part of HPG's continuous improvement process. All feedback or complaints will be logged, assessed, and responded to in accordance with the Action Management and Complaints Frameworks.
- 10.7.2 Issues or concerns will be investigated promptly, with outcomes communicated transparently. Where concerns cannot be resolved internally, residents will be advised of their right to escalate matters to the Building Safety Regulator (BSR) or the Housing Ombudsman.
- 10.7.3 Findings from engagement and feedback will inform Safety Case Reviews, Building Management Plans, and policy development.

10.8 Statutory Resident Notifications

- 10.8.1 HPG will comply with all notification requirements under the Building Safety (Management of Safety Risks etc.) (England) Regulations 2023. Residents will be notified, in clear and accessible language, when a Safety Case Report is submitted to the BSR, when a Mandatory Occurrence Report or serious safety incident is recorded, when the BSR issues enforcement or improvement notices affecting their building, or when significant building safety risks have been identified or resolved.
- 10.8.2 Notices will be issued promptly by appropriate means to ensure residents receive information directly and securely. Records of all statutory notifications will be stored as part of the Golden Thread of Information to evidence compliance.

10.9 Stakeholder and Internal Communication

- 10.9.1 HPG will maintain internal communication arrangements ensuring that relevant building safety information is shared promptly between departments, teams, and senior leaders. Significant safety risks, incidents, or regulatory developments will be reported through the Director of Building Compliance and Safety to the Executive Management Team (EMT) and Audit & Risk Committee.



10.9.2 HPG will comply with all regulatory reporting and notification duties to the Building Safety Regulator, the Fire and Rescue Authority, and the Regulator of Social Housing (RSH). All regulatory communications will be factual, transparent, and issued within prescribed statutory timescales.

10.9.3 Internally, cross-departmental collaboration between housing, asset, compliance, and communications teams will be maintained to ensure a consistent approach.

10.10 Contractor, Partner and External Communication

10.10.1 HPG will ensure that contractors, consultants, managing agents, and partners are informed of any building safety risks, restrictions, or incidents that may affect their work. Contractors will report progress, inspection outcomes, and remedial completions promptly to support assurance and accountability.

10.10.2 All safety-related communications with third parties will be documented and retained as evidence of compliance and due diligence. Engagement with external stakeholders – including residents, regulators, emergency services, and local authorities – will be proactive, transparent, and outcome-focused to support coordinated safety management.

10.11 Media and Public Communication

10.11.1 Public and media communications relating to building safety will be managed by HPG's Communications Team in consultation with the Executive Director of Investment and Growth and the Director of Building Compliance and Safety. All statements will be factual, transparent, and consistent with HPG's regulatory and legal obligations.

10.11.2 Resident privacy and data protection will be maintained at all times, with personal data handled in accordance with the Data Protection Act 2018 and UK GDPR.

10.12 Record Keeping and Continuous Improvement

10.12.1 HPG will maintain accurate records of all statutory, regulatory, and resident communications related to building safety. Evidence of communication, notification, and engagement will be retained to demonstrate compliance with statutory requirements and regulator expectations.

10.12.2 All communication records will be stored within approved compliance information systems forming part of the Golden Thread of Information.

10.12.3 Staff and contractors with resident-facing responsibilities will receive regular training in communication, consultation, and engagement practices.

10.12.4 Residents will be supported to develop understanding and confidence in building safety through accessible information, meetings, and educational initiatives.

10.12.5 Annual reviews of engagement activity – including satisfaction levels, feedback trends, and engagement outcomes – will inform policy, procedural, and communication improvements.

11.0 Data Management and Record Keeping

11.1 HPG will maintain complete, accurate and auditable building safety records to evidence compliance with legal and regulatory obligations.

11.2 Effective record management will support accountability, transparency, and assurance throughout the lifecycle of each building.



11.3 The Golden Thread of information will form the central record system for all Higher-Risk Buildings and relevant assets.

11.4 Data Accuracy and Quality

11.4.1 Information held within the Golden Thread will be verified, accurate, and kept up to date following any material change affecting a building's design, use, or safety systems.

11.4.2 Data will be maintained in secure, access-controlled digital systems that enable traceability, version control, and regulatory access.

11.4.3 Regular quality assurance reviews and audits will be undertaken to confirm that information remains complete, current, and consistent across all platforms.

11.5 Data Retention and Storage

11.5.1 Building safety records will be retained for periods compliant with statutory requirements and HPG's Data Retention Policy.

11.5.2 Records will be stored electronically within secure systems and backed up in line with data security standards.

11.5.3 Access to personal or sensitive data will be restricted to authorised personnel with a legitimate business need.

11.5.4 Data protection and confidentiality will be maintained in accordance with the Data Protection Act 2018, UK GDPR, and HPG's Data Protection and Privacy Policy.

11.6 Access and Information Sharing

11.6.1 HPG will share relevant building safety information with regulators, emergency services, contractors, and residents where required by law or where it supports safety and transparency.

11.6.2 Residents will have access to key safety information relating to their building in accordance with Section 91 and Schedule 8 of the Building Safety Act 2022.

11.6.3 Controlled access to the Golden Thread will be granted to competent and authorised third parties to support safe operations and regulatory compliance.

11.7 Audit and Assurance

11.7.1 HPG will oversee periodic audits of building safety data and records to verify completeness, accuracy, and compliance.

11.7.2 Audit outcomes will inform continuous improvement activity and be reported to the Audit & Risk Committee as part of the annual compliance assurance process.

11.7.3 Findings from data audits and incident reviews will be incorporated into training, system design, and policy development to strengthen governance and accountability.

11.8 Continuous Improvement

11.8.1 HPG will monitor national standards, regulator guidance, and sector best practice to ensure its data management and Golden Thread systems remain effective and compliant.

11.8.2 Lessons learned from audits, incidents, and regulator feedback will be used to enhance information accuracy, staff capability, and technological resilience.

11.8.3 HPG will review its data and record management approach regularly to reflect changes in legislation, digital standards, and business operations.



12.0 Performance Monitoring

- 12.1 HPG will monitor, measure and review building safety performance to ensure compliance with all statutory duties, regulatory expectations, and internal policy standards.
- 12.2 Performance monitoring will provide assurance to the Board, Audit & Risk Committee, and external regulators that HPG's buildings are safe, compliant, and effectively managed in accordance with the Building Safety Act 2022.
- 12.3 Governance and Oversight
 - 12.3.1 In accordance with the duties set out in the roles and responsibilities.
- 12.4 Performance Indicators
 - 12.4.1 HPG will maintain a suite of Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs) aligned with regulatory requirements and internal risk frameworks.
 - 12.4.2 Indicators will measure compliance with key statutory obligations, delivery of assurance programmes, and resident satisfaction with building safety engagement.
 - 12.4.3 KPIs will be reviewed periodically to ensure relevance, accuracy, and alignment with organisational objectives and emerging Building Safety Regulator expectations.
- 12.5 Internal Assurance and Audit
 - 12.5.1 HPG will operate a proportionate internal audit programme to test compliance with this policy and associated procedures.
 - 12.5.2 The programme will focus on high-risk and high-impact areas, including Safety Case management, Golden Thread information, resident communication and contractor competence.
 - 12.5.3 Findings will be reviewed, with corrective actions tracked and verified through the compliance assurance framework.
- 12.6 External Assurance and Benchmarking
 - 12.6.1 HPG will cooperate fully with inspections, audits, and enquiries conducted by statutory bodies, including the Building Safety Regulator (BSR), Fire and Rescue Authority, and Regulator of Social Housing (RSH).
 - 12.6.2 Learning from external audits, peer reviews, and sector benchmarking will be used to inform internal improvement plans and policy development.
 - 12.6.3 HPG will measure its performance against recognised best practice, including the Building a Safer Future Charter and National Housing Federation guidance.
- 12.7 Risk Management and Continuous Improvement
 - 12.7.1 Building safety risks will be managed in accordance with HPG's Corporate Risk Management Framework and included in both strategic and operational risk registers.
 - 12.7.2 Significant risks, including those arising from non-compliance or enforcement activity, will be escalated to the EMT and Audit & Risk Committee for review and oversight.
 - 12.7.3 Lessons learned from incidents, resident feedback, and audit outcomes will inform future policy reviews, training programmes, and safety improvements.

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- 12.7.4 Provide an annual Building Safety Performance Report to the Board summarising trends, key risks, and areas for improvement.

13.0 Non-Compliance and Escalation

- 13.1 HPG will adopt a consistent and transparent approach to identifying, managing, and resolving non-compliance with building safety legislation, policy, or procedures.
- 13.2 The objective is to ensure that any breach or failure is detected promptly, addressed effectively, and reported appropriately through governance and regulatory channels.

13.3 Definition and Scope

- 13.3.1 Non-compliance is defined as any instance where statutory duties, policy standards, or procedural requirements are not met, including failures in inspection, reporting, communication, or record management.
- 13.3.2 Non-compliance may arise from operational error, contractor performance, system failure, or management oversight.
- 13.3.3 All incidents of non-compliance will be assessed according to severity, potential impact on life safety, and regulatory significance.

13.4 Identification and Escalation

- 13.4.1 Non-compliance may be identified through audits, inspections, resident feedback, incident reporting, or correspondence from regulators.
- 13.4.2 All confirmed or suspected non-compliance must be reported immediately to the Head of Building Safety and logged within the compliance management system.
- 13.4.3 Significant or repeated non-compliance will be escalated to the Director of Building Compliance and Safety and reported to the EMT and Audit & Risk Committee.
- 13.4.4 Statutory breaches or high-risk incidents will be escalated without delay to the Chief Executive (Accountable Person), the Principal Accountable Person (PAP), and relevant regulators.

13.5 Corrective and Preventive Action

- 13.5.1 Corrective actions will be prioritised according to risk and implemented through the Action Management Framework.
- 13.5.2 Preventive measures will be developed to mitigate recurrence, including changes to procedures, enhanced training, or performance monitoring.
- 13.5.3 All corrective actions will be verified by a competent person prior to closure and retained as evidence within the Golden Thread of Information.

13.6 Communication and Reporting

- 13.6.1 Ensure all material instances of non-compliance and associated actions are reported to the EMT and Audit & Risk Committee.
- 13.6.2 Statutory notifications will be made to relevant regulators in accordance with legislative requirements, including the Building Safety Regulator (BSR), Fire and Rescue Authority, and Regulator of Social Housing (RSH).
- 13.6.3 Notify the Care Quality Commission (CQC) of any incident or building safety event that compromises the safety or continuity of care within regulated settings, in line with Regulation 18 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

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- 13.6.4 Residents will be informed of any significant safety-related non-compliance affecting their building, together with information on the actions being taken to restore compliance.

13.7 Accountability and Learning

- 13.7.1 Instances of negligence, misconduct, or wilful disregard for policy or legal duties will be managed under HPG's HR Disciplinary Policy.
- 13.7.2 Contractors found to be non-compliant with safety standards may be subject to contract suspension, termination, or removal from approved supplier lists.
- 13.7.3 Lessons learned from non-compliance investigations will be used to strengthen training, procedures, and management systems.
- 13.7.4 Conduct an annual review of non-compliance data to identify trends and systemic risks, reporting findings to the Audit & Risk Committee.

14.0 Equality, Diversity, and Inclusion

- 14.1 HPG is committed to ensuring that building safety management is delivered in an inclusive, fair, and accessible manner for all residents, staff, and stakeholders.

- 14.2 Equality, diversity, and inclusion (EDI) principles will be embedded across all aspects of building safety communication, engagement, and service delivery.

14.3 Legal and Regulatory Framework

- 14.3.1 This policy is underpinned by the Equality Act 2010 and supports compliance with:

- The Public Sector Equality Duty (Section 149 of the Equality Act 2010);
- The Human Rights Act 1998; and
- The Social Housing (Regulation) Act 2023 – Consumer Standards.

- 14.4 HPG will ensure that individuals are not disadvantaged or discriminated against on the basis of any protected characteristic.

14.5 Inclusive Building Safety

- 14.5.1 HPG will ensure that building safety activities, including communication, consultation, emergency planning, and training, are inclusive and accessible to all.
- 14.5.2 Reasonable adjustments will be made for residents and employees with disabilities to enable full participation and understanding in safety processes.
- 14.5.3 EDI considerations will be embedded within procurement, contractor management, and staff development activities to ensure equitable practice across the supply chain.

14.6 Accessible Communication

- 14.6.1 HPG will provide building safety information in accessible formats and languages appropriate to residents' needs.
- 14.6.2 Communication methods will include large print, Easy Read, translation, or digital accessibility tools, where required.
- 14.6.3 Residents' individual communication needs will be recorded and considered within building-level engagement plans.

14.7 Consultation and Representation



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- 14.7.1 Resident engagement activities will be inclusive and representative of the diverse communities HPG serves.
 - 14.7.2 Consultation processes will be designed to remove barriers to participation and ensure all voices are heard in safety-related decision-making.
 - 14.7.3 HPG will proactively engage with underrepresented groups to ensure their perspectives are considered in policy development and delivery.

14.8 Staff and Contractor Responsibilities

- 14.8.1 All staff and contractors involved in building safety activities will complete mandatory equality, diversity, and inclusion training.
- 14.8.2 Contractors and consultants will be required to demonstrate adherence to EDI principles consistent with the Equality Act 2010 and HPG's policies.
- 14.8.3 Ensure that equality standards are embedded within contractor selection, performance monitoring, and governance frameworks.

14.9 Monitoring and Continuous Improvement

- 14.9.1 The Building Safety Team, supported by the Equality, Diversity and Inclusion Group, will monitor equality performance within building safety delivery.
- 14.9.2 Equality impacts will be reviewed annually as part of policy and procedural updates, with findings reported to the EMT and Audit & Risk Committee.
- 14.9.3 An Equality Impact Assessment (EIA) will be undertaken at each policy review to identify and mitigate any disproportionate impacts.
- 14.9.4 Feedback from residents and staff will be used to strengthen inclusivity, accessibility, and fairness in building safety practice.

	Policy Control Sheet Building Safety Policy Policy reference number - 2025/017
Policy Author	David Nicholls – Director of Building Compliance and Safety Nick Pike – Resident Safety Manager
Direct Lead	David Hall Executive Director of Investment and Growth
Version	1.0 – December 2025
Target audience	HPG staff, contractors, residents and partners involved in the management or occupation of HPG buildings
Consultation	Wrekin Voices Customer Partnership Panel Directors Operational Delivery Teams Executive Management Team Audit & Risk Committee
Date of Equality Impact Assessment	An Equality Impact Assessment was completed on the 15 th August 2025
Date of Data Privacy Impact Assessment	Not required
Approving Body	Executive Management Team (Delegated by the Group Board)
Date of final approval	18 th December 2025
Implementation date	1 st April 2026
Monitoring arrangements	KPI's Health & Safety Compliance Teams Executive Management Team
Reporting	Executive Management Team – monthly Audit & Risk Committee – Quarterly HPG Board – Quarterly
Review date	October 2028
Expiry date	April 2029
Review cycle	Three year review cycle
Policy category	Health and Safety
Associated policies and procedures	Building Safety Management Procedures Corporate Health and Safety Policy Damp and Mould Policy Electrical Safety Policy Fire Safety Policy Gas Safety Policy Mandatory Occurrence Reporting Procedure Resident Engagement Strategies Water Hygiene (Legionella) policy
Policy location	SharePoint HPG Hub Housing Plus Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
D.Nicholls & N.Pike	New HPG policy, bringing together the two legacy organisations approaches	1.0 - December 2025	Executive Management Team – 18 th December 2025